

Canterbury Certified Farm Environment Plan

Auditor Manual

MAY 2020



Acknowledgements

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For more information please contact FEP.Audit@ecan.govt.nz

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1. Introduction

1.1 Canterbury Certified Farm Environment Plan (FEP) Auditor Manual Purpose

The Canterbury Certified FEP Auditor Manual (the Manual) has been prepared to:

- Describe processes and standard operating procedures that Certified FEP Auditors must follow
- Provide guidance for Certified FEP Auditors.

It is also recognised that the Manual may also be viewed by wider parties who are seeking assurance about the approach to and management of Canterbury FEP audit activities.

The following documents should also be referred to when viewing and applying this Manual:

- Canterbury Land and Water Regional Plan (LWRP);
- Canterbury Land and Water Sub-Region Sections of the Plan (Sub-Region Sections);
- Hurunui Waiau River Regional Plan (HWRRP);
- Industry-agreed GMP relating to water quality;
- Sector specific GMP (where available e.g. Beef & Lamb, DairyNZ, and NZPork etc);
- Specific FEP Auditor Guidance published by Environment Canterbury;
- AS/NZS International Standards Organisation (ISO) 19011 (Guidelines for quality and/or environmental management systems auditing);
- Environment Canterbury FEP Audit Disputes and Complaints Programme; Environment Canterbury FEP Auditor Certification Programme.

1.2 Farm Environment Plans and Auditing Overview

The Canterbury FEP Audit Programme focuses on establishing confidence that on-farm environmental risks are suitably identified and appropriately managed to meet farming practice standards and nutrient limits.

An FEP is a tool for farmers to:

- Recognise key on-farm environmental risks that relate to water quality and can have an effect on cultural values (mahinga kai) and biodiversity; and
- Set out a programme to manage those risks through the implementation of GMP.

FEPs are unique to a property and reflect the local climate and soils, the type and complexity of the farming operation, individual farm resource consent or Environmental Management Strategy (EMS) requirements and the goals and aspirations of the land user.

An FEP audit is an independent assessment of the implementation of:

- The programme to manage the identified environmental and mahinga kai risks associated with rural farming activities; and
- GMPs that would contribute towards the management of environmental and mahinga kai risks to minimise the impact on water and soil quality and thereby protect mahinga kai that can be affected by that water quality.

Note: EMS requirements are applicable for farms within Irrigation Schemes, Principal Water Suppliers or HWRRP Collectives where the individual farm does not hold a resource consent with FEP audit requirements.

1.3 Definitions

Terms with specific meaning in the context of the Canterbury FEP Audit Programme and this Manual are included in Appendix 6 (Definitions).

2. Auditing Purpose, Objectives and Scope

2.1 FEP Audit Programme Purpose

The purpose of the Canterbury FEP audit programme is to establish confidence that on-farm environmental and mahinga kai risks are being suitably identified and appropriately managed through the implementation of GMPs, resource consent and scheme/collective conditions.

Conducting consistent and robust FEP audits throughout the Canterbury region has been identified as critical in achieving this.

2.2 FEP Audit Programme Objectives

The Canterbury FEP audit programme objectives are:

- To evaluate progress being made towards meeting the LWRP Schedule 7 objectives and targets and associated practices included in FEPs based on a Level Of Confidence (LOC) approach;
- To encourage continuous improvement in the development and application of GMP;
- All farms to be operating at GMP or better;
- To ensure consistency in approach and audit assessments across Certified FEP Auditors and properties; and
- To provide a robust audit process that generates credible findings by professional Certified FEP Auditors.

2.3 FEP Audit Programme Scope

The scope of the Canterbury FEP Audit Programme is influenced by:

- The relationship between FEP audit activities and Environment Canterbury Consenting and Compliance activities and Irrigation Scheme, Principal Water Supplier holding a resource consent with an NLL and HWRRP Collectives EMS; and
- Individual FEP audit requirements, as described below.

2.3.1 Conditions that Trigger a FEP Audit

In Canterbury any farmer or consent holder is required to have an FEP and their FEP to be audited if they:

- Hold a resource consent to farm with a nutrient limit; or
- Hold an effluent discharge or water consent with FEP requirements; or
- Form part of a farming enterprise (a group of farmers managing nutrients as a collective) with a resource consent with a nutrient limit; or
- Receive water from an Irrigation Scheme holding a resource consent with a nutrient load; or
- Form part of a Collective within the Hurunui Waiau River Regional Plan (HWRRP).

Assessment of the FEP document against the Appendix attached to a resource consent or in an EMS containing criteria for the content of an FEP shall occur as part of the FEP audit. Consent Planners will not usually check the content of an FEP, except to ensure that it meets the requirements of a plan, to establish with confidence that on-farm environmental risks are suitably identified and appropriately managed. The key reasons for this are that:

- FEPs are living documents and may therefore be revised following:
 - The granting of the resource consent; or
 - Review of the resource consent; or
 - Changes in the EMS they are linked to; or

- Changes in on-farm practices or systems.
- Assessment of the suitability of FEPs and performance of farming activities to achieve environmental outcomes should be interdependent.

Note: there are water consents and effluent discharge resource consents with FEP and FEMP audit requirements in addition to Farming Land Use resource consents. In the situation where the farmer has multiple resource consents with FEP audit requirements it is the Farming Land Use resource consent FEP audit conditions that dictate the audit.

2.3.2 Relationship with Environment Canterbury Compliance Activities

The mandate and catalyst for the Canterbury FEP Audit Programme is the granting of resource consents or in an EMS that include specific conditions requiring an FEP and FEP audit.

Although these resource consents may include conditions covering matters other than the need for an FEP and FEP Audit, Certified FEP Auditors are not required to determine compliance with any of these other conditions. However, the commitment to comply with non-FEP resource consent requirements and regional and sub-regional rules will influence the Level of Confidence (LOC) awarded to relevant objectives and targets. The minimum standard is that consent holders must be meeting their environmental regulatory requirements in relation to the achievement of objectives and target(s) within the management areas under consideration.

This is because the Certified FEP Auditor's role focuses on assessing progress being made by farmers toward the practices listed in their FEP to manage the identified environmental risks by:

- Assessing the FEP content relative to the Appendix attached to a resource consent containing criteria for the content of an FEP; or
- Assessing the FEP content relative to the EMS; and
- Assessing whether on-farm actions are what is described in the FEP and if these meet GMPs, objectives and targets.

Should two subsequent FEP Audit assessments (or three for Irrigation Schemes, HWRRP Collectives and Principal Water Suppliers farms) find that the farm is a C or a D (as described in Table 4) then:

- For consented individual properties and farming enterprises (single and multi-management) – Environment Canterbury's Compliance Team will determine subsequent action; or
- For farms belonging to an Irrigation Scheme, HWRRP Collectives and Principal Water Suppliers - poor performance or lack of progress to meet GMP objectives or to get on-track to meet GMP objectives, will be notified to the Environmental Manager of the scheme, who will take action appropriate to the requirements set out in the scheme's EMS and liaise with Environment Canterbury.

Certified FEP Auditors are bound to notify Environment Canterbury of any relevant illegal activity they see being carried out that contravene the regional and sub-regional rules:

- For consented individual properties and farming enterprises (single and multi-management) – Environment Canterbury's Compliance Team; or
- For farms belonging to an Irrigation Scheme, HWRRP Collectives and Principal Water Suppliers – The Environmental Manager of the Irrigation Scheme, Principal Water Suppliers and HWRRP Collectives. ***At the earliest opportunity, the Environmental Manager will notify Environment Canterbury of the incident and course of action.***

(Please note that Environment Canterbury still retains the statutory power to carry out a site visit to assess the incident and undertake enforcement if it is deemed necessary).

Certified FEP Auditors shall also inform farmers when they observe an activity that contravenes farming-related rules. Please refer to section 4.5.18 (Observed Non-Compliance with Rules and Gross Pollution Incidents) and for more details on what to do when an illegal activity is sighted.

It is important for Certified FEP Auditors to understand that:

- Any auditing requirements included in resource consent conditions shall override any practice or procedure included in this Manual; and
- Environment Canterbury can perform its statutory functions to determine compliance with resource consent conditions.

It is expected that farms not meeting LWRP rules would be awarded a low level of confidence for the relevant management area and therefore a 'D' grade e.g. stock in waterways, direct discharge to a waterway, illegal offal pit etc.

Note: Incidents involving contaminants in waterways and unauthorised discharges to land or air should be notified to Environment Canterbury immediately by calling 0800 765 588 (24 hours). To help Environment Canterbury respond, please ensure you can provide an accurate location, the times and dates the incident was witnessed, and a full description of the activity, including photos or video if available.

2.3.3 Provision of advice

The role of a Certified FEP Auditor is not to act as a farm advisor.

The Certified FEP Auditor shall identify areas where it is necessary for better progress to be made toward the achievement of environmental outcomes and management of environmental risks to minimise and avoid an impact on water quality, which may also affect cultural values. The Certified FEP Auditor shall not, however, require specific solutions to be put in place nor prescribe changes to documents or farming practices.

However, if requested, the Certified FEP Auditor may suggest approaches that could be taken to address issues identified, and where advice and support can be obtained to create an action plan and implement the required actions.

As part of continuous improvement, the Certified FEP Auditor shall:

- Provide required action/s that are related to the 'reasons against' included in the FEP audit report;
- Provide required action/s related to achieving GMP, objectives and targets, e.g. investigate options and implement practices to minimise runoff of sediment into stream from stock track in paddock X;
- Provide required action/s to assist in the reduction of nutrient losses to meet GMP nutrient loss rates, e.g. investigate other options to decrease nitrogen losses and develop a time and timeframes; and
- Provide options of where advice and support can be obtained to implement required actions provided at the time of the audit and in the final audit report.

Note: The Certified FEP Auditor shall not use the audit process as an opportunity to promote the products/services of their employers as this is a Conflict of Interest.

2.3.4 Conflict of interest

To be able to audit an FEP (including the assessment of nutrient budget robustness), a certified FEP auditor is required to have:

- No financial interest (this can be in terms of major shareholdings, financial arrangements, agreements for supply of goods and services and so on) in;
- No family connection;
- No involvement in works or services including:
 - Consultancy or internal audits carried out in the previous 24-month period;
 - Development or review of current FEP and/or related nutrient budget; and
- Adherence to a Code of Conduct.

COI risk can arise during:

- Self-review: Certified FEP auditors audit FEPs they have prepared
- Advising: Certified FEP auditors provide advice to the audited farm
- Self-interest: Certified FEP auditors have only one client or one client represents a significant proportion of their business. The independence is at risk as they may be less likely to provide an audit grade or actions that may cause an issue for the client and/or lose their client
- Multiple referrals: Certified FEP auditors receive referral from a client. This can also be categorised as a self-interest risk
- Family member, friends, ex-staff and partners: Certified FEP auditors are a family member, ex-staff member, friend or partner of the audited farm or audit a FEP prepared by a family member or partner
- Two-partner practices

Certified FEP Auditors are required to confirm the adherence to a COI declaration included in the standardised audit template. Certified FEP Auditors are to ensure that Environment Canterbury has provided with the latest copy of the COI Policy of their employer at all times.

Failure to apply the above criteria may result in revocation of Certified FEP Auditor status.

2.3.5 FEP Audit requirements

FEP audit requirements are derived from the Appendix attached to a resource consent containing criteria for the content of an FEP or EMS.

In the case where there are consented properties with leased blocked then the following shall be applied:

- If there are **two resource consents**, i.e. one for the owned area and one for the leased area, the entire property can have one FEP and one FEP audit, **however**, the Certified FEP Auditor shall:
 1. Assess whether the FEP describes which portion of the land is owned and leased;
 2. Assess the relevant N losses against the relevant limit described in each resource consent; and
 3. For reporting purposes, report the audit findings per consent.
- If **one portion of land is a consented activity and the other a permitted activity**, the entire property can have one FEP and one FEP audit, **however**, the Certified FEP Auditor shall,
 1. Assess whether the FEP describes which portion of the land is consented and permitted;
 2. Assess only the consented activity N loss against the limit described in the consent; and

3. For reporting purposes, report the audit findings for consented portion of the land.

2.3.6 FEP Auditor Rotation

To prevent auditor familiarisation with a property there is an auditor rotation policy. A Certified FEP Auditor can conduct a maximum of three consecutive audits or a total of six consecutive years (whichever is the longest duration). This policy does not apply to accredited ISO programmes who follow their own rotation policy.

3. FEP Audit Process

3.1 FEP Audit Programme Management and Activities

An overview of the process flow for management of the Canterbury FEP Audit Programme is shown in Figure 1 and FEP audit activities in Figure 2.

This approach is broadly based on International Standard AS/NZ ISO19011, Guidelines for quality and/or environmental management systems auditing and applies the Plan-Do-Check-Act methodology.

Key responsibilities for each FEP Audit Programme component are also shown in Figure 1. This Manual focuses on implementation of the FEP audit programme, primarily carrying out audit activities.

The FEP audit activities shall focus on evaluation of the farm's overall performance.

For each management area identified in resource consent requirements and the EMS, the Certified FEP Auditor shall:

- Assess objective evidence presented;
- Justify their reasons for any positive and/or negative assessments; and
- Use this information to assign an overall level of confidence grade.

3.2 Requirements for Irrigation Schemes and Principal Water Suppliers holding a resource consent with an NLL, HWRRP Collectives

There are some differences in the FEP audit process for those properties or farming enterprises which are part of an Irrigation Scheme, Principal Water Supplier or HWRRP Collective, and those properties or farming enterprises for which an individual resource consent has been granted that is not part of such a Collective Group.

The Certified FEP Auditor shall obtain a copy of the EMS of the Irrigation Schemes, Principal Water Suppliers or HWRRP Collectives to familiarise with their governance, overarching targets and objectives and follow any specific processes and procedures, such as performance reporting.

Specific audit programme activities for properties or farming enterprises that are part of an Irrigation Scheme, Principal Water Supplier or HWRRP Collective or linked to an approved ISO accredited audit programme, and those that are not, are shown in Figure 3 (Canterbury Audit Process Overview) as follows:

Figure 3.1: Consented Properties and Farming Enterprises (single and multiple management);
Figure 3.2: Irrigation Schemes and Principal Water Suppliers holding a resource consent with an NLL, HWRRP Collectives; and

3.3 Requirements for farms linked to an approved ISO accredited audit programme and individual resource consent holders

There are some differences in the FEP audit process for farms linked to an approved ISO accredited audit programme, and those properties or farming enterprises for which an individual resource consent has been granted.

The Certified FEP Auditor shall obtain a copy of resource consent and ensure this is covered by the audit as well as conducting the audit to the ISO Programme requirements.

Specific audit programme activities for properties linked to an approved ISO accredited audit programme, and those that are not, are shown in Figure 3 (Canterbury Audit Process Overview) as follows:

Figure 3.3: Consented Properties and Farming Enterprises (single and multiple management) linked to an approved ISO accredited audit programmes.

Figure 1 - Canterbury Farm Environment Plans Audit Programme Process

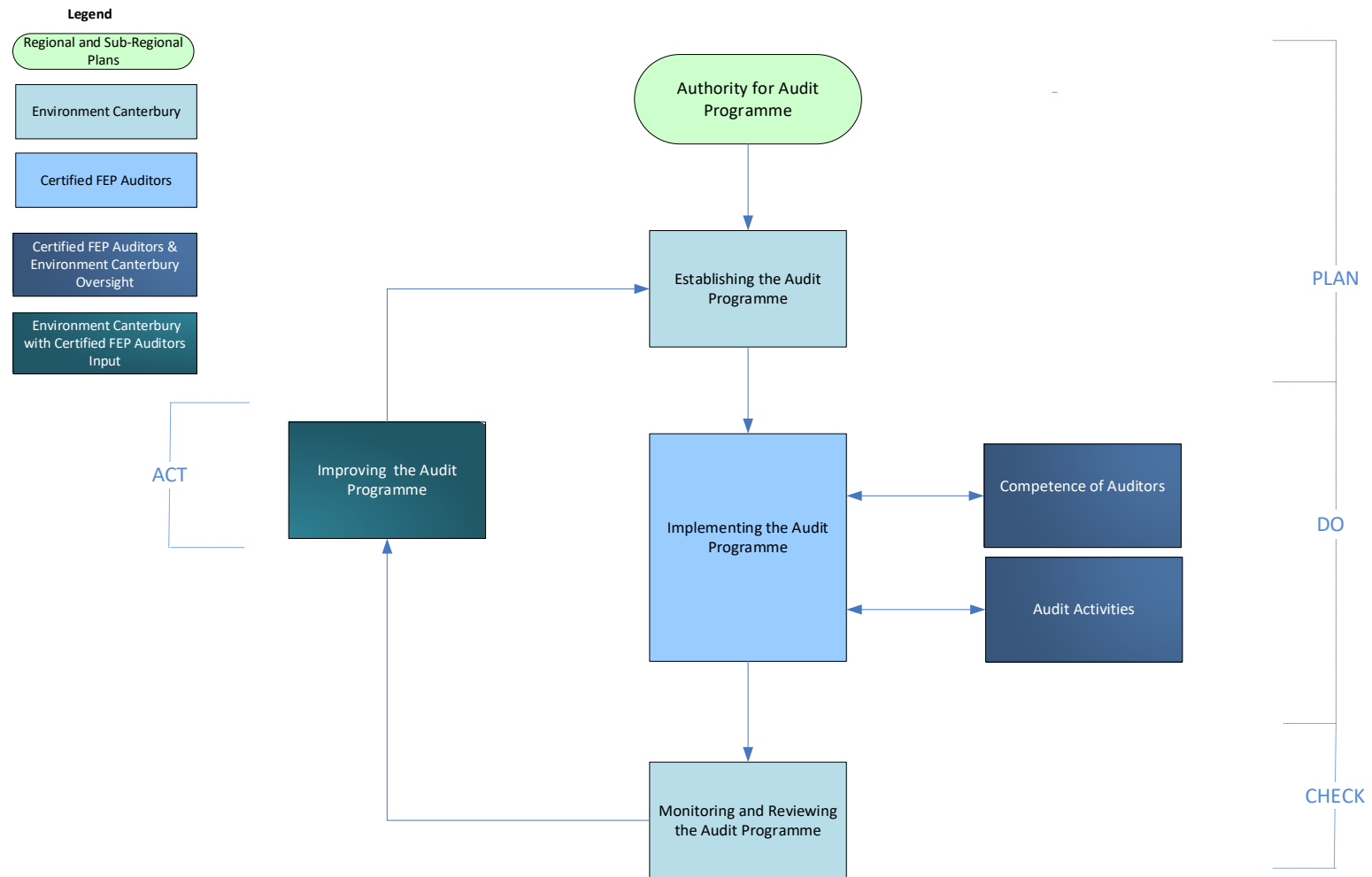


Figure 2 – Canterbury Farm Environment Plans Audit Activities Outline

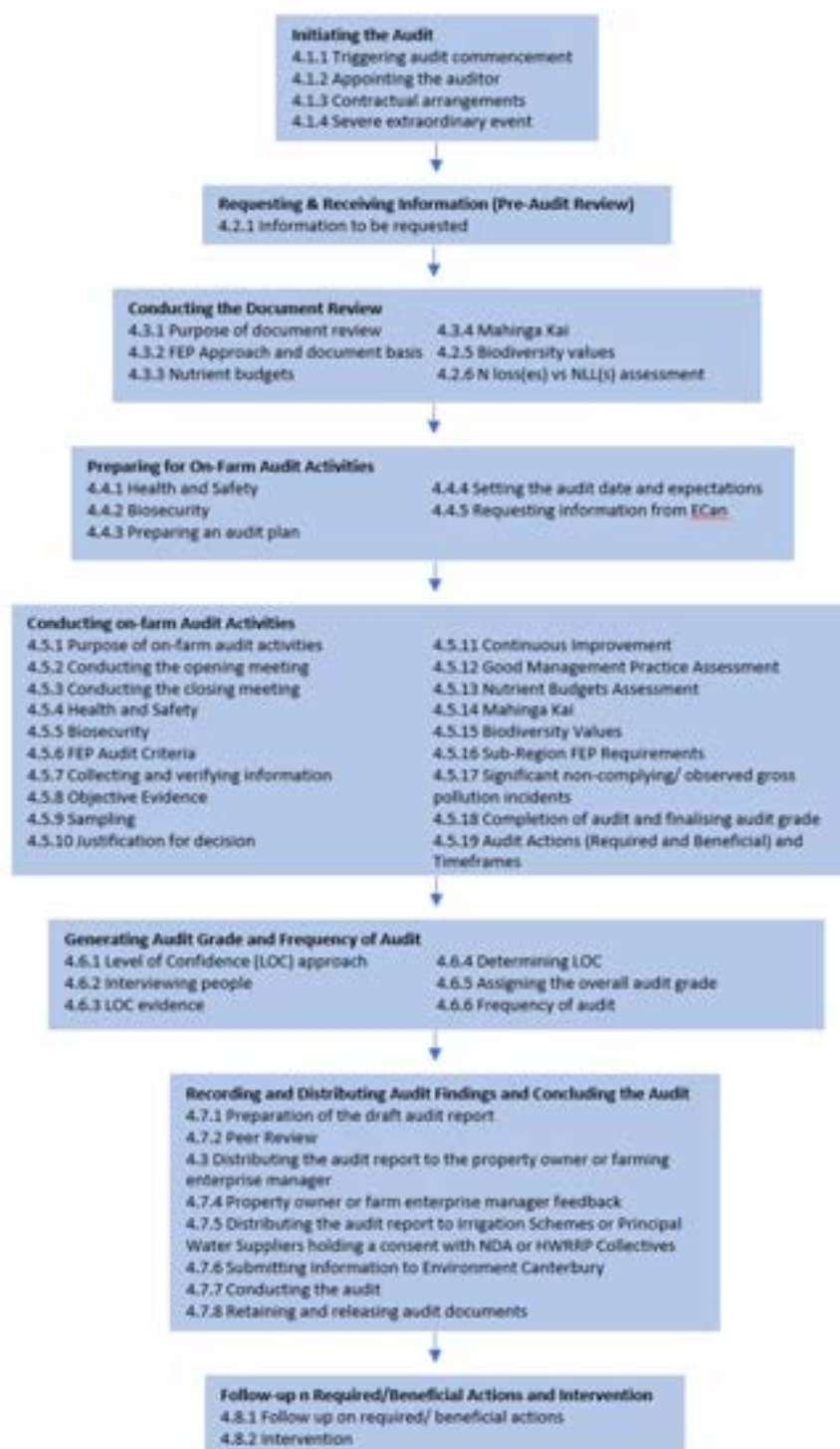


Figure 3: Canterbury Audit Process Overview

Figure 3.1: Consented Properties and Farming Enterprises (single and multiple management)

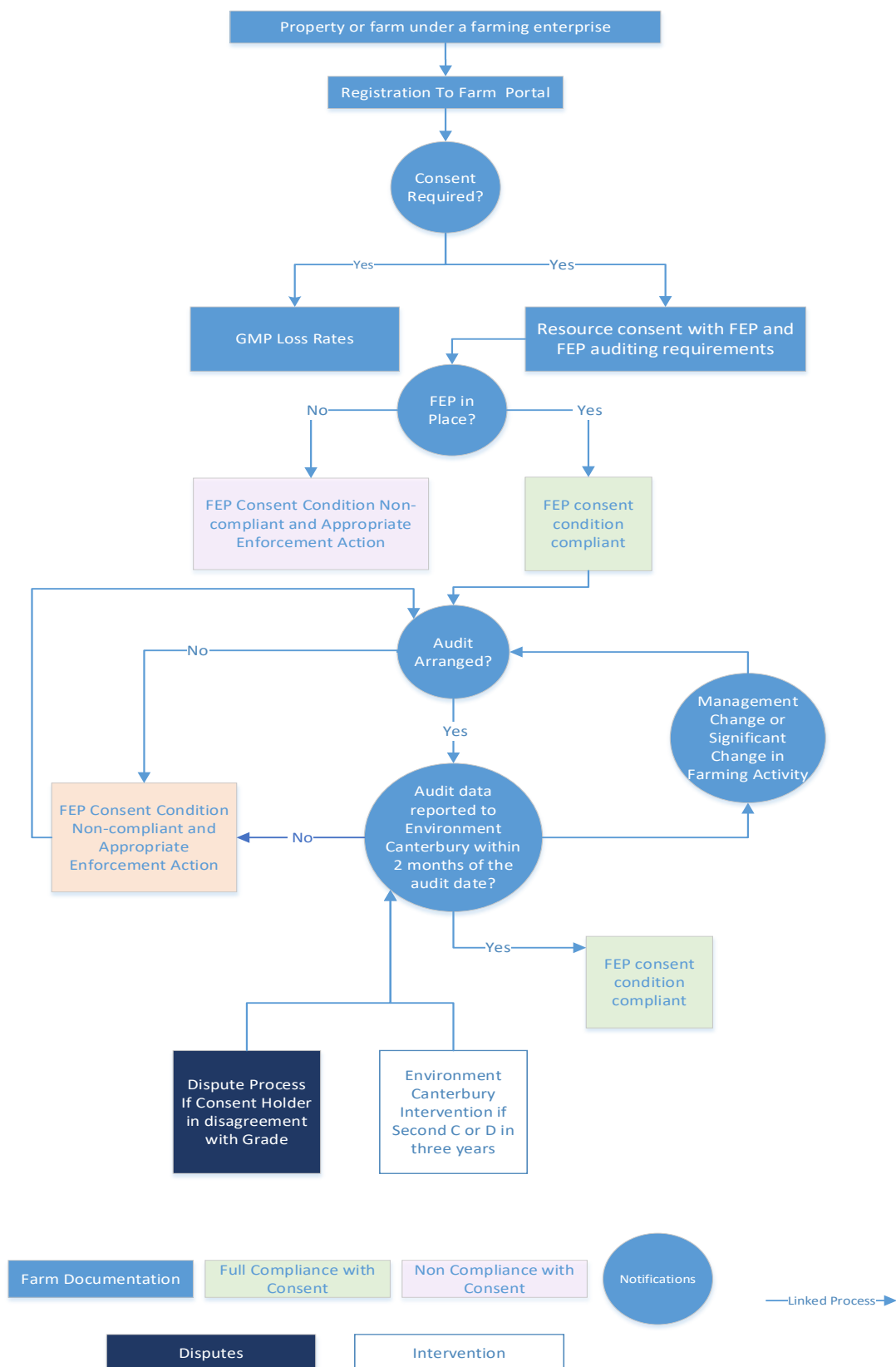


Figure 3.2: Irrigation Schemes and Principal Water Suppliers holding a resource consent with an NDA and HWRRP Collective

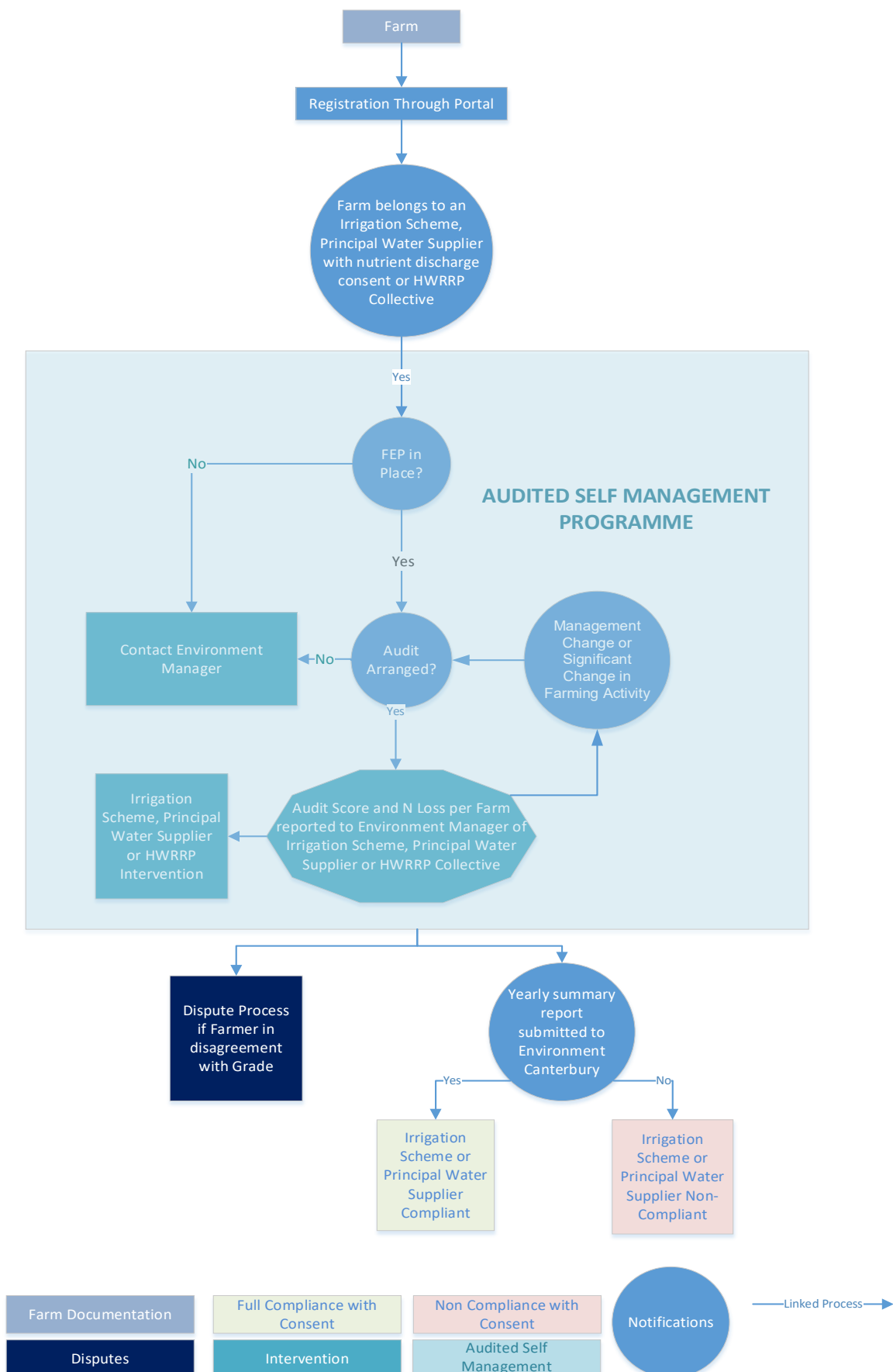
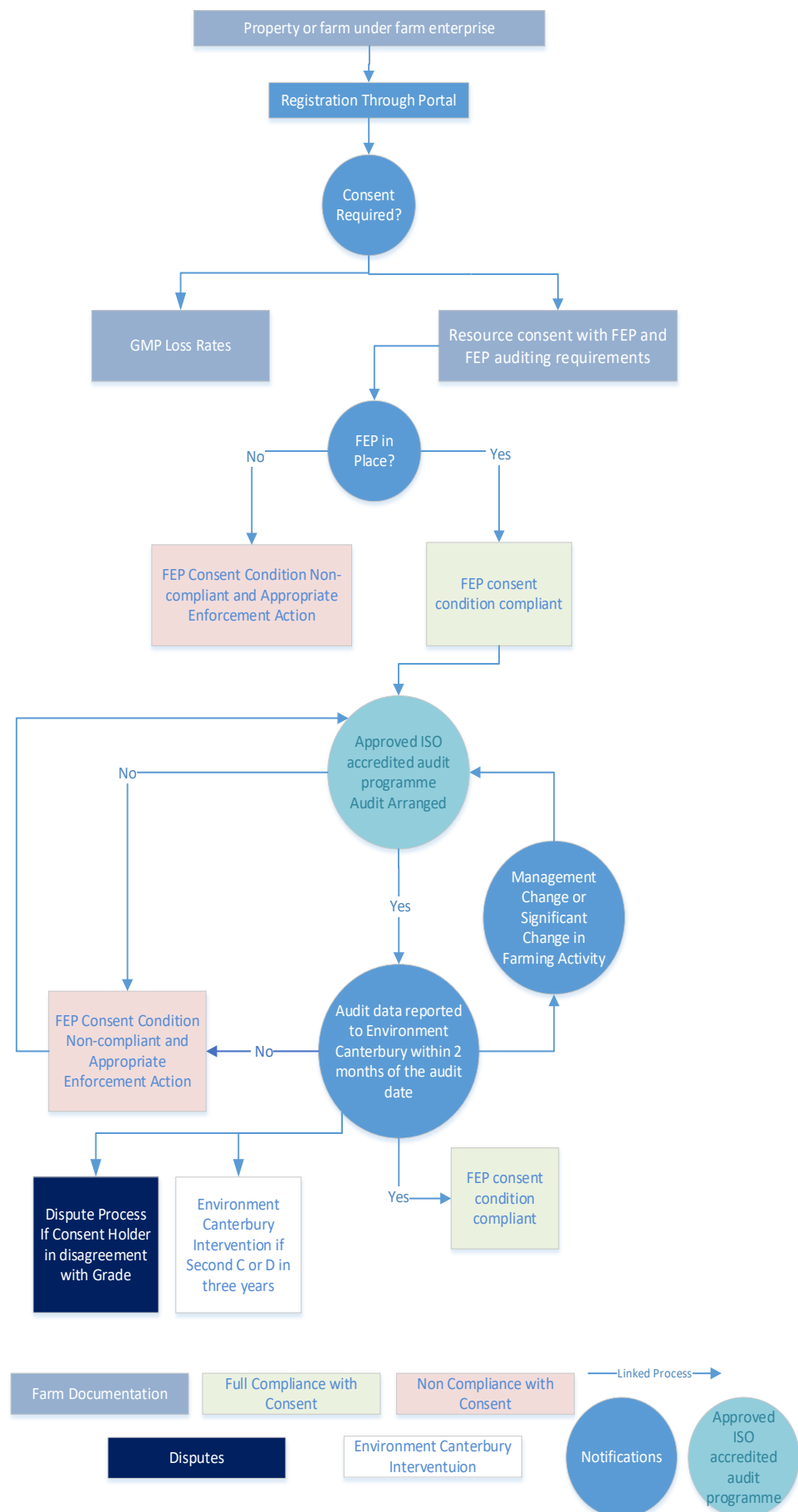


Figure 3.3: Consented Properties and Farming Enterprises (single and multiple management) linked to an Approved Industry Delivery Programme



4. FEP Audit Activities

4.1 Initiating the Audit

4.1.1 Triggering audit commencement

First FEP Audit

Consented properties and farming enterprises (single and multiple management)

An overview of the process for initiating audit activities for consented properties and farming enterprises is shown in Figure 4.

Resource consents that include a condition requiring development and implementation of an FEP shall stipulate the time when the first FEP audit is due (usually within 12 months)

Before the first FEP audit due date, Environment Canterbury will send a notification to the resource consent holder which:

- Indicates the audit due date;
- Includes a reminder that, in line with resource consent conditions, an FEP audit is due to be completed i.e. audit grade submitted to Environment Canterbury by the auditor before the due date;
- A checklist to help the resource consent holder prepare for audit;
- Requests the resource consent holder to:
 - Identify and contact an independent Certified FEP Auditor as defined in this Manual; and
 - Agree a date for the audit with the Certified FEP Auditor.
- Reminds the resource consent holder that:
 - their FEP needs to be up to date to reflect the resource consent conditions; and
 - help is available (industry body, farming consultant etc).

Irrigation Schemes and Principal Water Suppliers holding a resource consent with an NLL and HWRRP Collectives

Farmers belonging to Irrigation Schemes, Principal Water Suppliers or HWRRP Collectives will not receive a notification from Environment Canterbury that the first audit is due.

Instead, the management body shall ensure that the first audit for the farms is undertaken within the timeframes and conditions stipulated in their resource consent and/or EMS. An approved ISO programme may be recognised by the management body at their discretion.

Consented properties and farming enterprises (single and multiple management) linked to an approved ISO accredited audit programme

The approved ISO accredited audit programme management body shall notify all consented properties and farming enterprises that are part of their approved ISO accredited audit programme separate FEP audit is required for any farm that will have an audit carried out as part of an approved ISO accredited audit programme unless the farm is within the HWRRP area.

The approved ISO accredited audit programme Manager shall ensure that their audit score is converted into one of the Canterbury FEP scores listed in Table 4 and notify the farmer of the FEP audit grade.

Subsequent FEP Audits

Consented properties and farming enterprise (single and multiple management)

Environment Canterbury will also trigger notification to the consented farm owner or farming enterprise manager of the need to initiate subsequent FEP audits based on their audit grade.

Change in Management or Significant Changes in Farming Systems

If change in management or significant changes to farming systems have occurred, it is the consent holder's responsibility to inform Environment Canterbury as soon as possible regardless of previous audit grade. An FEP audit must be carried out within 12 months of the change of management or sooner for D graded farms.

Other

Environment Canterbury may request a re-audit or partial re-audit or spot-check when there has been a significant compliance issue identified or an issue identified as part of routine auditor monitoring.

Irrigation Schemes and Principal Water Suppliers holding a resource consent with an NLL and HWRRP Collectives

Irrigation Schemes, Principal Water Suppliers and HWRRP Collectives are responsible for ensuring that subsequent audits for farms belonging to their Irrigation Scheme, Principal Water Supplier or HWRRP Collective are undertaken within the timeframes shown in Table 4. These timeframes are determined by the grade awarded during the immediately previous audit or a change in management or significant changes in farm systems.

Consented properties and farming enterprises (single and multiple management linked to an approved ISO accredited audit programme)

Approved ISO accredited audit programmes shall also be responsible for ensuring that subsequent audits for farms belonging to their Programme are undertaken within the timeframes shown in Table 4.

4.1.2 Appointing the Certified FEP Auditor

Environment Canterbury maintain a list of Certified FEP Auditors. All FEP audits (other than approved ISO accredited audit programmes) will be conducted by a Certified FEP Auditor.

A Certified FEP Auditor shall be contracted by the resource consent holder or Scheme/Collective to carry out the FEP audit.

Irrigation Schemes, Principal Water Suppliers and HWRRP Collectives may use their Environment Manager if it can be confirmed that there is no Conflict of Interest to undertake their FEP audits if they are a Certified FEP Auditor. If not, the scheme will engage a Certified FEP Auditor directly.

4.1.3 Contractual arrangements

Parties to the contract for an FEP Audit

Environment Canterbury shall not enter into any contractual arrangements for performance of individual property or farming enterprise FEP audits. All contractual arrangements shall be made directly between the party requesting the audit and the Certified FEP Auditor.

The Certified FEP Auditor shall not enter into any contractual arrangements if they have been involved in the preparation of the FEP or nutrient budget for the property requiring the FEP audit.

Agreeing audit objectives, scope, criteria, peer reviews and costs

The Certified FEP Auditor is responsible for ensuring that any FEP audit contract they enter includes:

- Audit objectives, scope and criteria that can be completed in accordance with this Manual
- Any intentions for a peer review of the audit activities and/or report
- An estimate of audit fees and costs together with means by which any change to these will be agreed and met.

The Certified FEP Auditor shall request that the person responsible for the implementation of the FEP will be present on the day of the audit.

The audit should not take place if the person responsible for FEP implementation is not available. The auditor may request to speak to farm staff, nutrient budget advisor or any other parties that will assist in obtaining objective evidence. If permission to do so was withheld, this may constitute a reason for lowering the level of confidence given for the target under consideration.

Providing for liability and insurance

Certified FEP Auditors shall ensure that their contract includes appropriate liability provisions and that they are responsible for arranging appropriate insurance pertaining to any service performed throughout the FEP audit.

4.1.4 Severe extraordinary events

Severe extraordinary events are events such as storms, droughts, floods, snow storms, volcanic eruptions, earthquakes and biosecurity incursions including disease outbreaks.

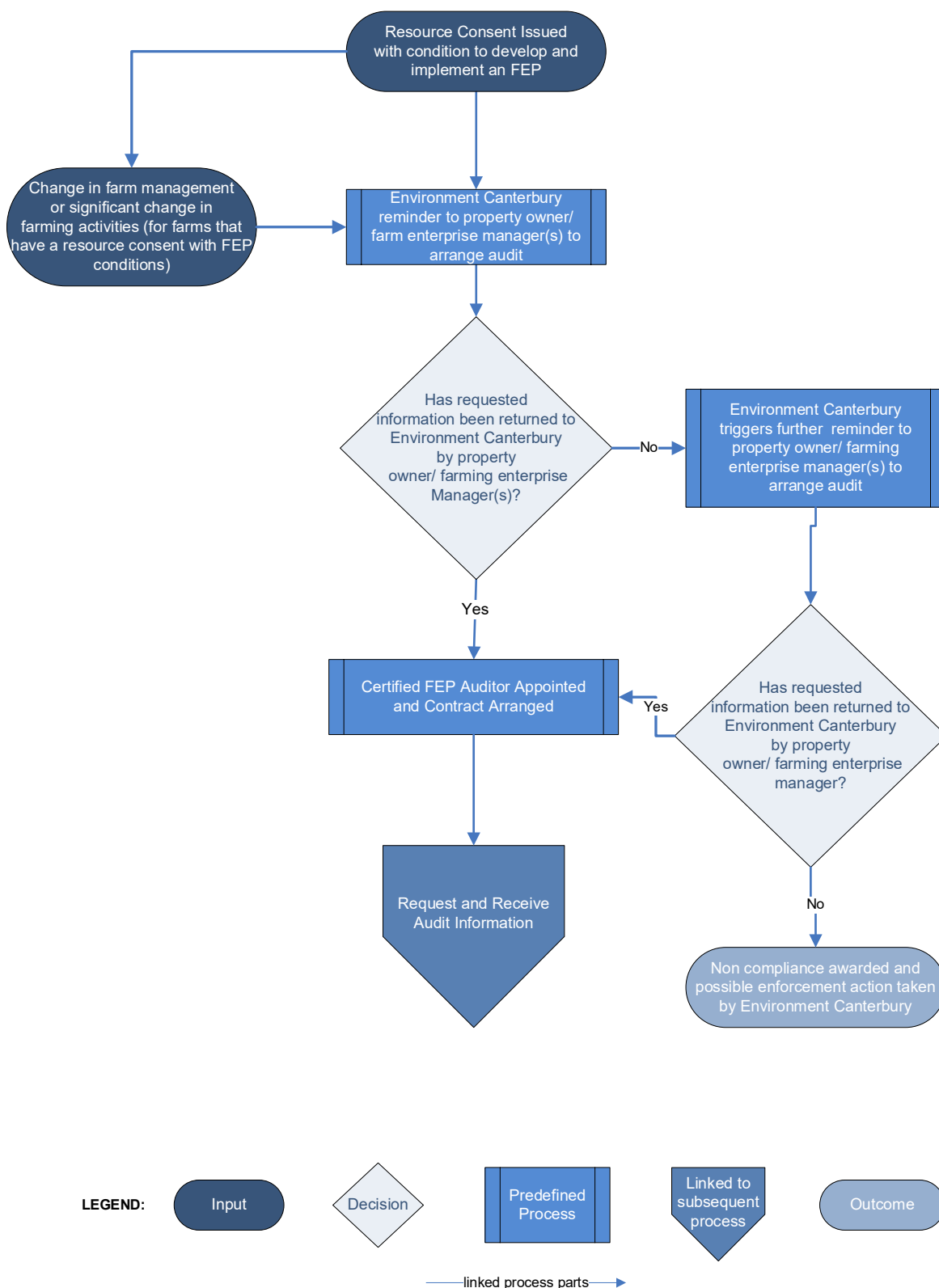
MPI classifies the impacts and scale of adverse events as either large, medium or localised. Based on the scale, MPI advises:

- Options available for farmers to prepare for the event;
- Magnitude of the event; and
- Capacity of the community to cope.

In the event of notified severe extraordinary events, Certified FEP Auditors are required to follow the advised National/sector/regional biosecurity sanitation procedures and the Environment Canterbury's recommended severe extraordinary events FEP Auditing procedures. Environment Canterbury will communicate with Certified FEP Auditors in such events.

Audit extensions can be requested by the consent holder for reasons including compassionate grounds and adverse events. All extension requests are to be sent via email to FEP.Audit@ecan.govt.nz prior to the audit due date.

**Figure 4: Initiating the Audit Activities
for consented properties and farm enterprises Overview**



4.2 Requesting and Receiving Audit Information (Pre-audit Review)

An overview of the process for Requesting and Receiving Audit Information (Pre-audit Review) shown in Figure 5.

4.2.1 Information to be requested

Upon entry into an FEP Audit contract, the Certified FEP Auditor shall request the information listed in Table 1 prior to the audit commencement and agree the date of submission.

Table 1: Information to be requested by the Certified FEP Auditor (Pre-Audit Review)

Information to be Requested		Caveat
Farm Identification		
<u>All consented properties and farming enterprises (single and multiple management)</u>		
Resource Consent Number(s) the audit is related to		<p><u>This is usually the land use resource consent.</u></p> <p>If no land use consent is in place, the audit may refer to the water use and/or effluent resource consent.</p>
<u>Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective</u>		
Reference number		For their farms, please follow the reference number for the farm included in the EMS or, in its absence, contact their Environment Managers to retrieve their own naming conventions.
FEP Information		
<u>All farms</u>		
Latest FEP		Must include a copy of property maps.
<u>Consented properties</u>		
Copy of the resource consent appendix containing FEP requirements		Certified FEP Auditors shall assess whether the FEP content matches the resource consent appendix requirements.

Information to be Requested	Caveat
<p align="center"><u>Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective</u></p>	
<p>A copy of the relevant Irrigation Scheme, Principal Water Supplier or HWRRP Collective EMS</p>	<p>This information is required only for farms connected to Irrigation Schemes, Principal Water Suppliers or HWRRP Collectives.</p> <p>The EMS will help Certified FEP Auditors to familiarise themselves with the relevant Irrigation Scheme, Principal Water Supplier or HWRRP Collective governance regime, overarching targets and objectives and to follow any specific processes and procedures, such as performance reporting that may be required.</p> <p>If the individual farmer does not have a copy of the EMS, the Certified FEP Auditor should contact the Irrigation Scheme, Principal Water Suppliers or HWRRP Collectives to request a copy of their EMS.</p>
<p align="center"><u>All farms</u></p>	
<p>Previous audit report and any action plans</p>	<p>At least the latest report should be retained by the resource consent holder and made available to the appointed Certified FEP Auditor.</p>
<p align="center">Nutrient Losses information</p>	
<p align="center"><u>All farms</u></p>	
<ul style="list-style-type: none"> Nutrient Budget(s) electronic analysis or paper copy of the budget Name of the person that prepared the nutrient budget Date of when the budget was prepared OVERSEER® Version (or equivalent model approved by the Chief Executive of Environment Canterbury) <p><i>Arable and horticulture farms and Selwyn Te Waihora catchment properties with N losses less than 15kg N/ha/yr only: NCheck – Farm Portal Nutrient Loss Report showing answers related to the farming system.</i></p>	<p>Please refer to the resource consent conditions to ascertain whether the farm falls under more than one nutrient management zone. If so, please ensure that the nutrient budgets supplied reflect the resource consent before proceeding to audit.</p> <p>In cases where it is specified on the resource consent NCheck can be used to generate:</p> <ul style="list-style-type: none"> i. A nitrogen baseline or nitrogen loss calculation; and ii. An updated nitrogen baseline or nitrogen loss calculation for a Farm Environment Plan audit when the nitrogen baseline or nitrogen loss calculation used in the Farm Environment Plan was generated using 'NCheck'

Information to be Requested	Caveat
<p style="text-align: center;"><u>Consented properties</u></p> <ul style="list-style-type: none"> • Current Year N Loss (latest version of OVERSEER® (or equivalent model approved by the Chief Executive of Environment Canterbury)) • Consented NLL: <ul style="list-style-type: none"> ○ Baseline* (latest version of OVERSEER® (or equivalent model approved by the Chief Executive of Environment Canterbury)) ○ Farm Portal Nutrient Loss Report containing: <ul style="list-style-type: none"> ▪ GMP Loss Rate as determined by Farm Portal (based nutrient budget estimated using latest version of OVERSEER®) ▪ Baseline GMP as determined by Farm Portal (based nutrient budget estimated using latest version of OVERSEER®) 	
<p style="text-align: center;"><u>Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective</u></p> <p>If applicable, current Year N Loss (latest version of OVERSEER® or equivalent model approved by the Chief Executive of Environment Canterbury)</p> <p>If applicable, GMP Loss Rate as determined by the Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective (Please see section 4.3.7.3 for reasoning)</p>	
	<p>To determine whether farm meets Target 1 of Objective 1 and 2 of the Nutrient Management Area. The GMP Loss Rate and Baseline GMP shall relate to the latest version of OVERSEER® (or equivalent model approved by the Chief Executive of Environment Canterbury)).</p> <p>The GMP Loss Rate shall relate to the latest version of OVERSEER® (or equivalent model approved by the Chief Executive of Environment Canterbury))</p>

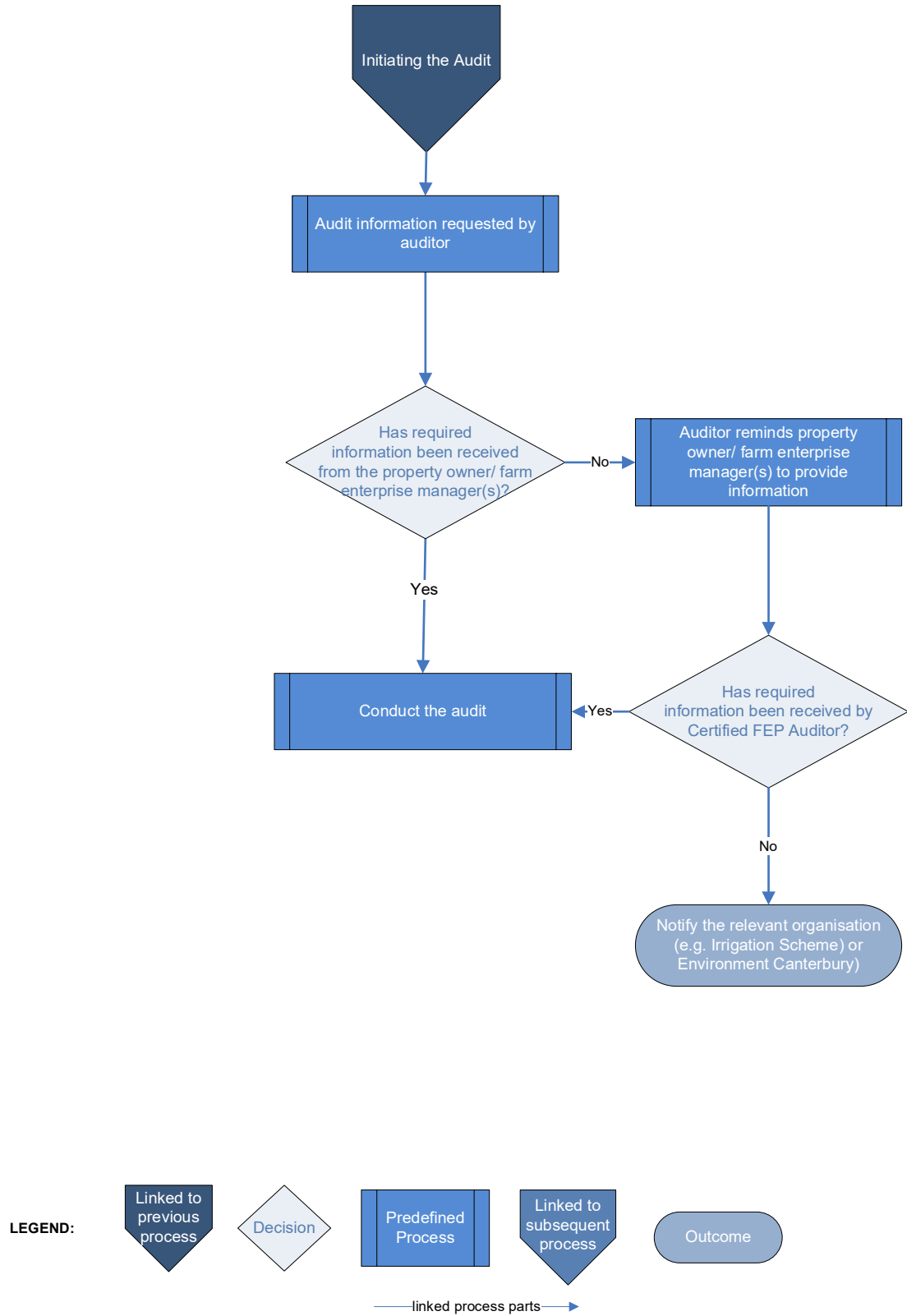
Information to be Requested	Caveat
Health and Safety - Biosecurity Information	
<u>All farms</u>	
Health and Safety procedures	Certified FEP Auditors shall follow all Health and Safety procedures stipulated by the farmer and the Certified FEP Auditor's own organisation.
<u>All farms</u>	
Biosecurity procedures	Certified FEP Auditors shall follow all biosecurity procedures stipulated by the farmer and the Certified FEP Auditor's own organisation.
Severe extraordinary events	In the event of notified severe extraordinary events, Certified FEP Auditors are required to follow the advised National/sector/regional biosecurity sanitation procedures and the Environment Canterbury's recommended severe extraordinary events FEP Auditing procedures.

If the requested information is not received within the agreed timeframe, the Certified FEP Auditor shall remind the resource consent holder that they are required to submit the information within one week of the confirmed audit date.

At a minimum, for the audit to be able to be carried out, a copy of the FEP, nutrient budget and previous audit report (if applicable) must be submitted to the Certified FEP Auditor. If this information is not provided, then the Certified FEP Auditor cannot properly prepare for the audit and is not following the procedures set out in this manual.

If the minimum information has not been submitted to the Certified FEP Auditor by the audit due date, the Certified FEP Auditor shall advise the Irrigation Scheme or Principal Water Supplier or HWRRP Collective Environment Manager OR Environment Canterbury that the audit has been postponed or cancelled due to requested information not provided.

Figure 5: Requesting and Receiving Audit Information (Pre-audit Review) Activities
Overview



4.3 Conducting the Document Review

4.3.1 Purpose of the document review

A review of the FEP document shall be completed by the Certified FEP Auditor. The purpose of the document review is to:

- Conduct a risk assessment to determine which activities and areas of the property will be viewed;
- Consented properties - Check whether the FEP document meets the requirements defined in the appendix attached to the resource consent;
- Ensure that an FEP developed as part of an Irrigation Scheme, Principal Water Supplier or HWRRP Collective programme meets objectives and targets described in their EMS and familiarise themselves with any specific processes and procedures that should be followed during the audit;
- Assess the robustness of the nutrient budget as described in separate FEP Auditor Guidance;
- Aid preparation for on-farm audit activities to understand the farm risks and the areas of special focus during the audit.

The FEP, nutrient budget and other supporting documentation is to be reviewed before commencing on-farm audit activities.

4.3.2 FEP review approach and document basis

A Certified FEP Auditor shall assess whether the FEP addresses requirements defined in either:

- The relevant appendix of a resource consent requiring an FEP; or
- The EMS of an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective's.

If during the audit, the Certified FEP Auditor finds that:

- Any relevant management area (including objective and targets) as indicated by the resource consent or EMS has not been considered as part of the FEP,
 - A "D" grade should be awarded to the farm; and
 - Follow up actions should indicate the inclusion of those management areas in line with either:
 - the appendix of their resource consent; or
 - the EMS the farm is connected to.
- Any other information is missing, such as list of resource consents or farm maps, the Certified FEP Auditor shall:
 - Consider the lack of information as part of the LOC assessment; and
 - As a follow up action, indicate to include the missing information in the FEP.

4.3.3 Nutrient Budgets

The Certified FEP Auditor shall assess whether the current nutrient budget(s) is/are robust in line with the FEP Auditor Guidance on Nutrient Budgets and Loss Rate Assessment.

The absence of nutrient budget for the current year related to the property shall decrease the level of confidence for the nutrient management area to a 'low' LOC and therefore a D grade awarded. The absence of the nutrient budget would prevent the Certified FEP Auditor to:

- Undertake the robustness of the nutrient budget assessment, this being an integral part of the audit programme; and
- Assess whether appropriate nutrient management practices are implemented within the hotspots identified in the budget.

If there are multiple nutrient budgets, the auditor shall assess the current nutrient budgets that refer to different farm systems. For example, if one farm had three dairy sheds, and three nutrient budgets prepared each season (one for each shed), then each of the three nutrient budgets would need to be assessed.

Note: The audit shall not commence if there is not a current nutrient budget available unless approval has been granted from Environment Canterbury.

4.3.4 Previous audits

Copies of previous audit findings, including recommended improvements and supporting documents should preferably be obtained from the resource consent holder or may alternatively be obtained from the previous Certified FEP Auditor.

The Certified FEP Auditor should follow-up and look for objective evidence any required actions identified during previous audits and consider the effectiveness of actions in addressing these. Improvements in practices that are included in the FEP and/or the application of farming practices between audits should also be identified by the Certified FEP Auditor.

If a 'required action' hasn't been completed within the prescribed timeframe this would lower the LOC awarded for any related objective and targets by the current Certified FEP Auditor. The farm may receive a lower overall audit grade due to actions not completed.

4.3.5 Mahinga Kai

The Certified FEP Auditor shall:

- Take note of all mahinga kai areas (any waterbodies, wetlands, mahinga kai species and habitats); and
- Determine if the FEP (or accompanying mahinga kai guide) contains:
 - The appropriate management area objective and targets that impact mahinga kai values; and
 - Assessment of risks to mahinga kai values;
 - Maps indicating the location of mahinga kai areas; and
 - Additional objective and targets for Selwyn Te Waihora, Waimakariri, Orari Temuka Opihi Paeora (OTOP) and Waitaki properties (if applicable); and
 - GMPs to protect and enhance mahinga kai based on the assessment of risks.

4.3.6 Biodiversity Values (Waitaki and OTOP properties only)

The Certified FEP Auditor shall:

- Note all biodiversity values have been identified on the FEP Map; and
- Determine if the FEP contains:
 - The appropriate targets and/or objectives; and
 - GMPs to protect and enhance biodiversity values.

4.3.7 N loss(es) vs NLL(s) assessment

Where applicable, this assessment relates to Target 1 of Objective 2 of the Nutrients Management Area. If the resource consent does not include any requirement for the assessment of current N loss(es) against the NLL(s) then the relevant target or objective shall be graded as Non-Applicable.

Note: This does not remove the requirement for the Certified FEP Auditor to assess the robustness of the current nutrient budget presented.

The auditor shall ensure that the N loss(es) and NLL(s) have been calculated and assessed for the nutrient management zones described in the resource consent conditions. Please refer to the FEP Auditor Guidance on Nutrient Budgets and Loss Rate Assessment

4.4 Preparing for On-Farm Audit Activities

4.4.1 Health and Safety

The Certified FEP Auditor shall:

- Understand all health and safety procedures and information provided by the farm manager and abide by these; and
- Take into consideration any additional requirements due to work undertaken by contractors e.g. harvesting, construction, maintenance and repairs etc.
- Raise any health and safety concerns directly with the host immediately; and
- Cease the audit at any stage where safety has been compromised or is at risk; and
- Ensure that all necessary Personal Protective Equipment (PPE) required to be taken onto farm by the Certified FEP Auditor is clean (biosecurity), fit for purpose and in good working condition.

4.4.2 Biosecurity

The Certified FEP Auditor shall:

- Understand all biosecurity procedures provided by the farm manager for visitors and abide by these;
- Ensure that all necessary equipment is clean and in good condition.

If the farm is experiencing an outbreak of contagious disease, such as M. bovis, Salmonella or Yersinia, the Certified FEP Auditor shall postpone the audit until the farm has been declared as clear. Environment Canterbury should be advised of this postponement and the reason for it.

Biosecurity for pig farms

Pig farmers seek to maintain a high health status of their pigs to ensure healthier pigs, limit deaths and maintain productivity. They do this by eliminating some diseases and parasites from their farm, buy in stock from high health herds, breeding their own replacement stock, having a quarantine and acclimatisation procedure in place for new stock arriving on farm. To maintain their health status, they limit possible disease vectors, one of these being visitors to the farm, including vehicles and equipment.

If you want to visit a pig farm you will be required to adhere to biosecurity protocols. These may include but are not limited to:

- To have a 'stand down period' (no contact with any pigs) from other farms, sale yards, backyards for up to 72 hours or longer;
- Change into farm clothing and footwear provided by the farm;
- Visiting vehicles to remain outside boundary of farm;
- Sterilisation of any equipment taken into piggery;
- Shower in and out of the farm; and
- Sign a document stating that you have not had contact with pigs.

Before visiting the farm, check with the farm what the farm biosecurity requirements for visitors are.

4.4.3 Preparing an audit plan

The Certified FEP Auditor shall prepare an audit plan to facilitate scheduling and coordination of on-farm audit activities and agreement of these with the property owner or farming enterprise manager. The audit plan should be sufficiently flexible to allow for changes that may become necessary as the audit progresses.

As part of the audit plan, the Certified FEP Auditor shall ensure that they have reviewed, and prepared work documents referred to in section 4.2.1 (Information to be requested) of this Manual. A copy of the audit plan and nutrient robustness checks should be kept on file.

Environment Canterbury will provide a specific Certified FEP Auditor view at Canterbury Maps and the relevant mapping layers should be viewed as part of the audit planning.

Matters covered in the audit plan should include the following:

- The date, time and place where the on-farm audit activities will be conducted;
- Issues identified (including farming activity risks by management area) in the pre-audit check that should be considered during the on-farm audit assessment;
- Expectations of the property owner during the audit (e.g. guiding around the farm, availability to answer questions, demonstration of specific practices);
- An outline of audit activities expected to take place, including opening and closing meetings, consideration of specific issues highlighted during the document review or otherwise identified;
- Logistical arrangements (e.g. ensuring access to the property, specific facilities or equipment);
- Health and Safety procedures to be followed at the time of the audit;
- Biosecurity procedure to be followed at the time of the audit; and
- Confidentiality reassurance.

A Pre-Audit Checklist/ Audit Plan template can be found in appendix 1. Use of the Pre-Audit Checklist/ Audit Plan template provided in Appendix 1 is not mandatory and a Certified FEP Auditor may develop and use their own Pre-Audit Check and Audit Plan documents. No matter the format of the plan the Certified FEP Auditor should be able to show that they have covered off points listed above. However, irrespective of the document used to record pre-audit checks and prepare audit plans, the Certified FEP Auditor should retain copies as these could be considered during the Auditor Certification re-registration assessment, during a disputes and complaints process, or enforcement process.

4.4.4 Setting the audit date and expectations

The Certified FEP Auditor shall agree a date for the on-farm audit assessment with the consent holder and inform them of:

- Farm data/records that need to be available at the time of the on-farm audit assessment;
- Farm practices or activities to be observed; and
- Farm locations to be viewed.

It is also essential that the person responsible for FEP implementation or farming enterprise manager is present at the time of the audit because:

- Conversations with them can contribute the accuracy of audit findings, including assessment levels of confidence and identification of follow up actions; and
- Access to records, ability to observe farm practices or activities and ability to access farm locations or equipment may be enabled or enhanced.

Note: if a farm has separate managers for different aspects of their operation (e.g. Irrigation Manager) then there may need to be multiple farm personnel available at the audit to ensure all management areas are covered. If the appropriate personnel are not present for the audit this may lead to a lower LOC for the management area under consideration.

4.4.5 Requesting information from Environment Canterbury

When preparing for the audit the Certified FEP Auditor can request that the consent holder completes an approval form to allow Environment Canterbury to release information to the Certified FEP Auditor. This information includes:

- Compliance history;
- Environmental incidents/complaints;
- Abatement notices;
- Audit reports; and
- Consented baseline/nitrogen discharge allowance Overseer files.

Requests must be received on the form provided by Environment Canterbury and within the stated timeframe.

4.5 Conducting On-Farm Audit Activities

Certified FEP Auditors shall document the audit including evidence sighted at the on-farm visit using the correct FEP Audit Reporting Template:

1. Consented individual properties, single and multi-management enterprises:
 - i. The Environment Canterbury FEP Audit Template to record findings for audits related to consented individual properties, single and multi-management enterprises.
2. Irrigation Schemes, HWRRP Collectives and Principal Water Suppliers holding a discharge resource consent with a N load or limit:
 - i. The Irrigation Schemes, HWRRP Collectives and Principal Water Suppliers own templates as long as they include the objectives and targets forming part of their resource consent or within their EMS.
3. ISO Programmes:
 - i. The Environment Canterbury FEP Audit Template to record findings for audits related to consented individual properties, single and multi-management enterprises.
 - ii. The ISO Programme is to use the template agreed with the Irrigation Schemes, HWRRP Collectives and Principal Water Suppliers in the case when the ISO programme audit is to count as a scheme or collective audit.

An overview of the process for Conducting On-Farm Audit Activities is shown in Figure 6.

Please note that sufficient records of evidence sighted must be kept by the Certified FEP Auditor and provided during a future spot-check, or dispute investigation, if requested.

4.5.1 Purpose of on-farm audit activities

The purpose of the on-farm audit activities is to assess:

- The extent to which FEP document content has been met; and
- Progress being made toward the achievement of objectives, targets and GMPs that would contribute towards the management of the identified risks in the FEP to minimise the environmental impacts of farming activities and thereby protect cultural values that can be affected by these impacts.

4.5.2 Conducting the opening meeting

The Certified FEP Auditor shall commence the on-farm audit assessment with an opening meeting involving the person responsible for FEP implementation or farming enterprise manager to:

- Make an appointment/set time to meet with personnel that are on tight schedules.
- Introduce yourself and tell them why you are auditing them.
- Tell them how long you expect the interview to take and the types of information you will be looking at. Explain how the on-farm audit assessment activities will be carried out;
- Confirm the audit timetable and other relevant arrangements;
- Confirm matters relating to confidentiality;
- Discuss any concerns raised during the pre-audit review;
- Re-affirm that the audit findings will be provided at the completion of the on-farm assessment;
- Confirm matters related to Health and Safety; and

- Confirm matters related to Biosecurity.

The audit should not take place if the person responsible for FEP implementation is not available.

4.5.3 Conducting the closing meeting

The Certified FEP Auditor shall close the on-farm audit assessment with a closing meeting involving the person responsible for FEP implementation or farming enterprise manager to:

All farms:

- Thank them for their cooperation
- Compliment them for areas that are performing well
- Summarise the main areas that require attention and do not meet the required standards
- Give an indicative grade. If you are still unsure on the exact grade, then explain that to the farmer
- Explain that the audit findings including the required actions and the timeframe to achieve them will be provided to them in an audit report
- Explain that they will receive a draft copy of the report and will be given 10 working days to provide feedback on the report
- A copy of the final report will be sent to them and a copy submitted to Environment Canterbury via the online tool (Where applicable)
- There is a formal disputes (grades) and complaints (professionalism) process available to consent holders at www.canterburyfarm.water or contacting ECan Customer Services, however, the farmer is encouraged to communicate with their auditor.
- Invite any comments from the farmer and ask them if they understand the next steps.

Additional information depending on what grade is achieved:

A grade:

- Explain that their next audit will be in 3 years (or 4 years for Irrigation Schemes/Collective/Water User Groups)
- Explain that this is a compliant grade and they will receive a letter from ECan confirming this (or from their irrigation scheme/Collective/Water User Group, if applicable)
- Explain that they are required to maintain their current practices
- Explain that you encourage A grade farms to go beyond the standards and you have made a number of recommendations on opportunities for improvement in the audit report.

B grade:

- Explain that their next audit will be in 2 years
- Explain that there are a number of actions that need to be addressed prior to the next audit
- Explain that this is a compliant grade based on them having an action plan to address the issues and they will receive a letter from ECan confirming this (or from their irrigation scheme/Collective/Water User Group, if applicable)
- Explain that if the required actions are not adequately addressed by the next audit then this may result in the next audit grade reducing to a non-compliant grade.

C grade:

- Explain that their next audit will be in 1 year
- Explain that there are a number of actions that need to be addressed prior to the next audit
- Explain that this is a non-compliant grade they will receive a letter from ECan confirming this (or from their irrigation scheme/Collective/Water User Group, if applicable)
- Explain that the expectation is that they will achieve a compliant grade at the next audit

- Explain that an Environment Canterbury Land Management Advisor will make contact with them. (or a representative from their Irrigation scheme/Collective/Water User Group, if applicable)

D grade:

- Explain that their next audit will be in 6 months
- Explain that there are a number of actions that need to be addressed prior to the next audit
- Explain that this is a non-compliant grade they will receive a letter from ECan confirming this (or from their Irrigation scheme/Collective/Water User Group, if applicable)
- Explain that the expectation is that they will achieve a compliant grade at the next audit
- Explain that an Environment Canterbury Land Management Advisor will make contact with them. (or a representative from their Irrigation scheme/Collective/Water User Group, if applicable)

4.5.4 Health and Safety

To understand health and safety risks and potential hazards on the farm, the Certified FEP Auditor shall ensure that:

- A safety briefing is undertaken to re-affirm any hazards present on the farm on the day of the audit.
- Follow all the Health and Safety procedures as required by the property owner, principal contractor or farming enterprise manager, including those provided prior to the on-farm audit assessment.
- Follow all the Health and Safety procedures provided by the Certified FEP Auditor's own organisation.

4.5.5 Biosecurity and diseases

To eliminate, isolate or minimise potential spread of disease and pests, the Certified FEP Auditor shall ensure that:

- A biosecurity briefing is undertaken to re-affirm any biosecurity matters;
- All National, Regional and Industry biosecurity guidelines are followed;
- Biosecurity criteria for Pig Farms listed in section 4.4.2 (Biosecurity) are followed;
- Appropriate PPE is worn while on farm; and
- No area of the farm shall be accessed unless accompanied or given permission by the farm manager.
- In the event of notified biosecurity and/or disease outbreaks, follow the Environment Canterbury's recommended biosecurity and disease outbreak FEP Auditing procedures.

4.5.6 FEP audit criteria

The farming activity occurring on the property must be audited against the following minimum criteria:

- An assessment of performance against the objectives, targets, good practices and timeframes in the FEP;
- An assessment of the robustness of the nutrient budget/s;
- An assessment of the N loss limits (where required); and
- An assessment of any additional farming land use resource consent conditions.

Note: The expectation is that the minimum environmental regulatory requirements relating to the management areas being assessed are met. If consent holder cannot meet those requirements (e.g. stock in waterways, offal pit distances etc) then this would result in a downgrading of the LOC.

4.5.7 Collecting and verifying information

To carry out their assessment against the minimum criteria, the Certified FEP Auditor should:

- Review farm data/records;
- Visit locations on the property or parts of the farming enterprise where areas of interest/issues can be observed in order to assess the application of practices to meet targets and objectives;
- Observe practices occurring that relate to areas of interest/issues can be observed to assess the application of practices to meet targets and objectives; and
- Carry out interviews using open questions, engaging with and listening to the property owner or farming enterprise manager.

4.5.8 Objective evidence

All decisions must be made on the sighting of objective evidence. This may include:

- Information provided at the time of audit (actual data, photographs, records; reports, invoices, contract for planned work/upgrade);
- Stated practice, provided it can be reasonably justified with other information or evidence;
- Observation of actual GMPs;
- Nutrient budgets; and
- Field observation.

Examples of objective evidence against targets for each management area are included within FEP Auditor Guidance that has been published on a specific topic.

Note: The Certified FEP Auditor shall keep detailed notes of evidence sighted during the audit. This may include photos, or the name/date of any documents sighted. In the case of 'farm systems discussions' notes on the discussions held and with whom is recommended. In the case of a formal dispute/complaint the auditor may be asked to provide a recollection of events over and above the audit report. Records should be kept for a minimum of 7 year.

4.5.9 Sampling

It is not always practical for the Certified FEP Auditor to examine all available information during an audit or visit every feature (e.g. all waterbodies on a station). The objective of audit sampling is to provide information for the auditor to have confidence that the audit objectives can and will be achieved. The Certified FEP Auditor may use judgment-based sampling or statistical based sampling as guided by AS/NZS ISO19011.

4.5.10 Justification for decisions

All audit findings, being LOC assessments (see 4.6 Generating Audit Grade and Frequency of Audit), must be supported by information which justifies the decision, including some of or all:

- 'Reasons for the assessment' (based on GMP);
- Objective evidence; and
- 'Reasons against the assessment'.

Justification for decisions (both for and against) could include reference to GMPs, including those which can and cannot be supported by quantitative means.

4.5.11 Continuous Improvement

Audit findings should promote continuous improvement in farm practices.

During the assessment the Certified FEP Auditor should therefore recognise innovation and provide flexibility for the implementation of GMP and GMP changes over time. The auditor should consider effort made by the consent holder to implement new practices and have regard for the timeframe that implementation of new practices may require (even if longer than is defined in the FEP).

4.5.12 Good Management Practice assessment

The Certified FEP Auditor shall assess whether the activities carried out on the farm meet GMP and determine the LOC with which the FEP target and objectives are met. When GMP is met, the Certified FEP Auditor shall have a higher LOC than the target and objectives included in the FEP are being met.

When assessing GMPs, the Certified FEP Auditor should:

- Assess the application of GMPs that are related to the current farm system;
- Assess the resource consent or scheme/collective FEP requirements;
- Take into consideration the period over which the implementation programme is planned to occur and assess progress relative to that programme; and
- Recognise not only when industry and sector specific GMP have been applied, but also when practices beyond this have been implemented at the farm and recognise their implementation.

4.5.13 Nutrient budgets robustness assessment

The FEP Auditor Guidance on Nutrient Budgets and N Loss Assessment contains guidance on how to determine the robustness of nutrient budgets, nutrient loss assessment including Farm Portal reports.

4.5.14 Mahinga kai

Where applicable, mahinga kai protection and enhancement through the implementation of GMP is now a target (target 4) within the Waterbody Management Area (wetlands, riparian areas, drains, rivers, lakes) of the regional FEP framework. Some Sub-Regions have additional requirements which need to be included in the FEP.

The Certified Auditor shall assess:

1. Whether the FEP contains mahinga kai objectives and targets:
 - iii. Mahinga kai risks are adequately identified in the FEP; and
 - iv. GMPs applied to manage those risks.

Note: If mahinga kai has been omitted from the FEP then this is treated like any omission of a management area objective and target and a low LOC is to be awarded for the omitted objective or target.

The FEP Auditor shall ascertain whether a property waterbody(s) and what part of the property waterbody(s) fall(s) within an Environment Canterbury rating district by referring to Canterbury Maps – Flood Protection and Drainage Bylaw layer on Canterbury Maps. (The Certified FEP Auditor shall not refer to the general maps shown on Environment Canterbury - Flood protection and drainage schemes webpage as those maps show the general rating district rather than the actual section of the waterway managed by the rating district).

For properties that are within a rating district, the Certified FEP Auditor shall:

1. Audit activities related to mahinga kai targets and objectives;
2. Not audit drain cleaning activities if the drains are cleaned by Environment Canterbury or other Local Authorities.

4.5.15 Biodiversity values

Biodiversity values protection and enhancement through the implementation of Sub-Regional requirements, e.g. Waitaki.

The Certified FEP Auditor shall assess, where applicable:

1. Biodiversity values have been adequately identified in the FEP; and
2. GMPs to address their protection and enhancement.

4.5.16 Sub-Region FEP requirements

Certified FEP Auditors shall assess the progress made towards meeting Sub-Region FEP requirements included in the appendix of resource consents or the EMS of an Irrigation Scheme or Principal Water Supplier (holding a resource consent with an NLL(s)) or HWRRP Collective, as they would influence the LOC of meeting the objective and targets included in the FEP.

The Certified FEP Auditor shall record in the audit report:

- The progress made towards meeting the Sub-Region FEP requirements in line with the Level of Confidence approach; and
- The necessary required actions and timeframes to ensure conformity with Sub-Region FEP requirements and to meeting the FEP objectives and targets.

The progress made towards meeting Sub-Region targets and objectives will influence the overall audit grade.

4.5.17 Significant Non-compliance/Observed Gross Pollution Incidents

Certified FEP Auditors shall ensure that the steps shown below are followed when they observed any gross pollution incidents (which are likely to be non-compliant with Regional and Sub-Regional rules) before finalising the audit grade and concluding the audit:

When a Certified FEP Auditor observes a gross pollution incident the process to follow is:

- For consented individual properties and farming enterprises (single and multi-management):
 - a. Request farmer addresses any observed non-compliance before finalising the audit grade.
 - b. If the non-compliance is not rectified within the timeframes required to finalise the audit, the Certified FEP Auditor shall conclude the audit and finalise the audit grade (C/D grade).

- c. The Certified FEP Auditor shall have a Low or Medium LOC that the targets and objectives are being met where the systems and processes have not been changed to the extent to prevent a future gross pollution event
 - d. The Certified FEP Auditors shall also report any gross pollution to Environment Canterbury within 24 hours of the farm visit ending
- For farms belonging to an Irrigation Scheme, HWRRP Collectives and Principal Water Suppliers:
 - a. Notify the Manager of the Irrigation Scheme, Principal Water Suppliers and HWRRP Collectives and if possible, obtain and submit photographic evidence.
 - b. The Manager will then notify Environment Canterbury of the incident and course of action within 24 hours of being notified.

Examples of gross pollution are:

- Stock in waterways;
- Discharge of contaminants into waterways (e.g. effluent; agrichemicals, leachate from silage pits; milk etc.);
- Burning of toxic waste (e.g. tyres);
- Vegetation clearance against a Region or Sub-Region rule or unconsented activity; and
- Illegal works in waterways (e.g. building bridges and or culverts).

If in doubt, the Certified FEP Auditor should discuss the incident with Environment Canterbury.

Note: Incidents involving contaminants in waterways and unauthorised discharges to land or air should be notified to Environment Canterbury immediately by calling 0800 765 588 (24 hours). To help Environment Canterbury respond, please ensure you can provide an accurate location, the times and dates the incident was witnessed, and a full description of the activity, including photos or video if available.

4.5.18 Completion of the audit and finalising the audit grade

The Certified FEP Auditor shall conclude the audit when they are satisfied that no further assessment is required.

Once the audit is concluded and before leaving the property they shall summarise the audit activities, provide an overview of audit findings and inform the consent holder and any other key management contacts:

- Of the indicative result of the audit (targets LOCs, overall grading and required actions with timeframes);
- If relevant, where to seek advice and support to create an action plan to implement the required actions; and
- That a draft of the audit report will be sent to them for consultation before finalising the audit report.

4.5.19 Audit Actions (Required and Beneficial) and Timeframe

Audit findings may include identification of:

- Required Actions; or
- Beneficial Actions (A grades or High LOC Objectives and Targets only).

The registered FEP Auditor shall provide **SMART** required or beneficial actions.

Specific
Measurable
Agreed-upon
Realistic
Time-related

Required Actions

These are action(s) to improve farm performance in order that FEP objectives and/or targets to be meet. All required actions will be related to a 'reason against assessment'. If there are no reasons against the assessment, then there can be a recommended action. The timeframes to close a required action are :

- The next audit due date which is determined by the audit grade or; The deadline which is stated in the FEP when the action is included in an FEP (plans in place, on-track to meet GMP)'.

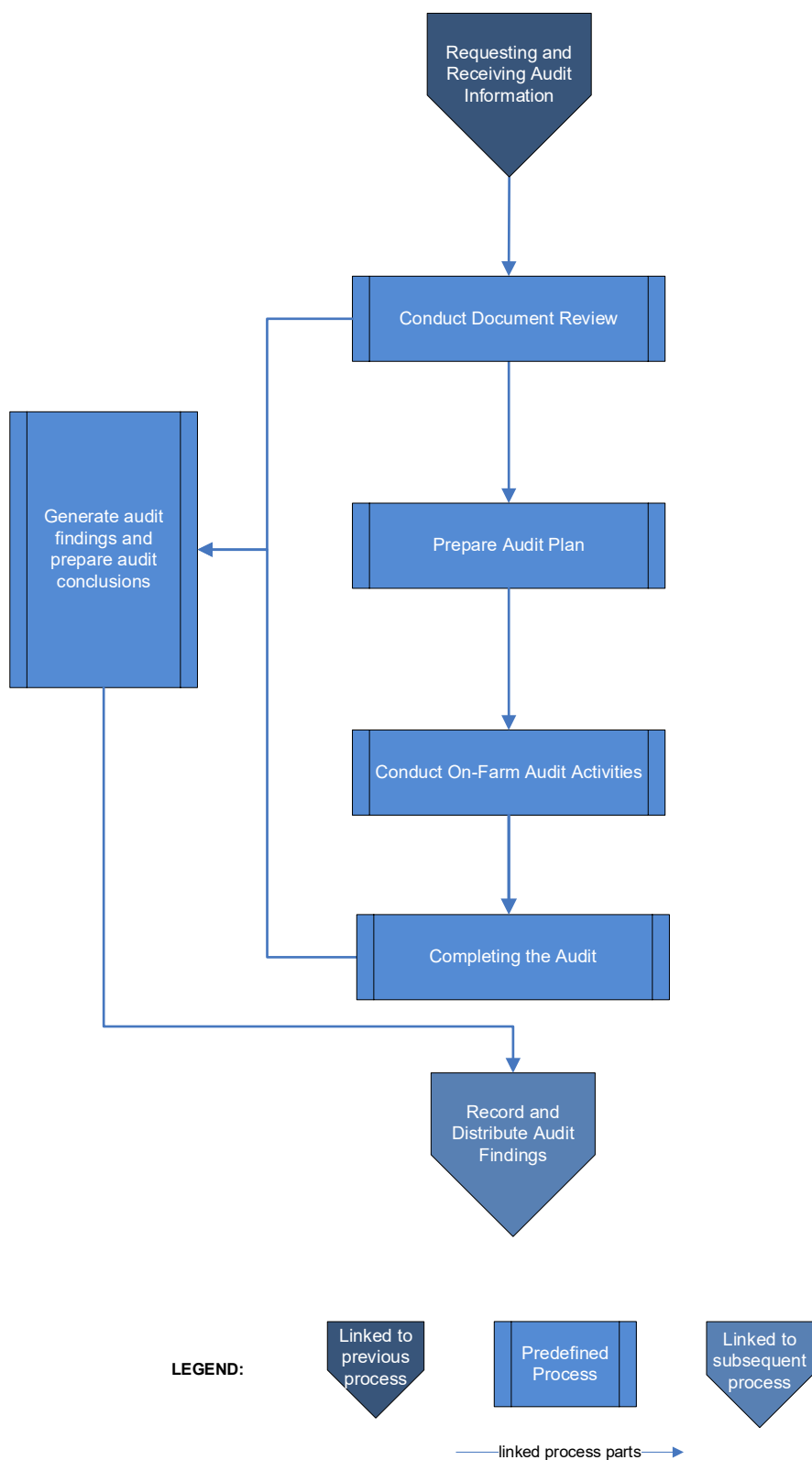
Beneficial Actions – A grades or High LOC Objectives and Targets only

Any audit required or beneficial action(s) identified should be discussed with the resource consent holder during the on-farm audit closing meeting. At that time the Certified FEP Auditor should also explain to the resource consent holder that it is necessary to prepare an Action Plan or update the FEP to include the Action Plan for addressing the audit required actions and implement that plan (beneficial actions implementation is voluntary).

While audit required actions identify the need for improvements to be made for objectives and/or targets to be achieved, the resource consent holder must make decisions about how targets and objectives will be met, including what GMPs are appropriate and implement these.

The Certified FEP Auditor may provide options for solutions and where advice and support can be obtained, such as Environment Canterbury (Land Manager Advisors, Biodiversity Officers or Monitoring and Compliance Officers), Industry Organisations (such as Dairy NZ, Irrigation New Zealand and Dairy Companies) or consultancies, to create an action plan and implement the required or beneficial actions.

Figure 6: Conducting On-Farm Audit Activities Overview



4.6 Generating Audit Grade and Frequency of Audit

4.6.1 Level of confidence (LOC) approach

The LOC approach shall be applied when generating audit findings.

The LOC approach involves assessing the likelihood that each objective and associated targets will be met. The LOC assessment shall:

- Be based on how well the objective and targets for each Management Area have been met;
- Consider whether systems and processes:
 - Are in place to effectively manage the risks associated with achieving objectives and targets for each Management Area;
 - Meet GMP; and
 - Meet the appendix of Resource Consents or the EMS of the Irrigation Schemes or Principal Water Suppliers (holding a resource consent with an NLL(s)) or HWRRP Collectives.
- Include reviewing current practices, together with proposed additional actions and their appropriateness, in terms of achievement of objectives and targets plus proposed timeframes for implementation.

LOC assessments for each objective must be justified by:

- Targets Reasons for the Assessment (based on GMPs);
- Targets Objective Evidence; and
- Targets Reasons Against the Assessment.

Justification for decisions (both for and against) could include reference to GMPs, including those which can and cannot be modelled.

4.6.2 Interviewing people

Interviewing people is an important skill for auditing and the LOC approach. It is important that you can extract the information you need from personnel that you interview during the audit. It is important to keep in mind that some people may feel nervous about being interviewed or may feel that you are 'interrupting' their busy work schedule. To get the best result it is recommended that you:

- Ask 'open' questions if you are requiring an explanation.
- If there is a problem or likely 'reasons against assessment' then explain this clearly before you end the interview as well as raising the closing meeting.
- Always thank them for their time (regardless of how cooperative they were)

Interview questions that are 'open' ended as opposed to closed generally contain some of the following statements:

- Can you explain to me how you
- Can you show me how you do

Environment Canterbury will provide each new auditor with more information on auditing skills during induction.

4.6.3 LOC evidence

Assessment of the LOC should be based on a combination of:

- Information provided at the time of audit (actual data, photographs, records; reports, contract for planned work/upgrade);
- Stated practice, provided it can be reasonably justified with other information or evidence;
- Observation of actual GMPs;
- Stated GMPs supported by evidence;
- Nutrient budgets; and
- Field observation.

GMPs will be dependent on farming type, soil and climate. When assessing the LOC associated with meeting an objective or target, observed on-farm practices should be compared to the GMPs. The Certified FEP Auditor is therefore required to be familiar with the relevant Industry-agreed GMPs for the farming activity being audited (e.g. sheep, beef, horticulture, dairy, outdoor piggeries). Further GMP interpretation or guidelines may be developed over time. This guidance will be formally recognised as guidance by Environment Canterbury.

The following approach can help Certified FEP Auditors determine objective evidence:

1. Establish the basics

- Gain an understanding of the farm (management, procedures/controls, training approach, responsibilities etc)
- Is the auditor in the right place talking to the right people?
- Can I view all of the management area processes?

2. Identify the processes for each management area

- How is it managed
- Inputs/outputs/controls/resources
- Steps in process
- What happens at each step?

Note: Don't look for evidence until you understand the process, can use an example to gain understanding e.g. ask for an explanation on how the effluent system works including emergency situations.

3. Search for objective evidence

- Find evidence – observable, can be verified
- Three ways:
 1. Records/physical samples
 2. Interview staff
 3. Watch process (can tie into interview)

Note: Concentrate on key points and select an appropriate sample size if you are checking records.

4. Check Back

- Check interfaces between processes (e.g. effluent application and soil moisture records)
- Follow up on previous findings
- Ensure all planned audit points covered
- A continuous process

4.6.4 Determining the LOC and audit grade

The process for determining overall FEP audit grading and timing between audits differs for properties and farming enterprises that are part of an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective and those that are not. This is illustrated in Appendix 4 which comprises three parts:

- Appendix 4.1: Process for Determining Overall FEP Audit Grade – property or farming enterprise (single and multiple management) is part of an Irrigation Scheme, Principal Water Supplier holding a resource consent with an NLL(s) or HWRRP Collective;
- Appendix 4.2: Process for Determining Overall FEP Audit Grade – consented property or farming enterprise (single and multiple management) part of an approved ISO accredited audit programme; and
- Appendix 4.3: Process for Determining Overall FEP Audit Grade – Consented property or farming enterprise (single and multiple management) is not part of an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL(s) or HWRRP Collective or approved ISO accredited audit programme.

The following four steps shall be followed to determine the LOC and the audit grade:

1. Identify reasons for and against:
 - For targets LOC rating and required actions;
 - If practices recorded as “reason for” meeting GMP, a higher LOC of meeting targets and objectives will be triggered; and
 - With objective evidence.
2. Establish the objective and targets LOC rating for each management area;
3. Assign the overall audit grade and frequency of re audit.

Specific requirements relating to nutrient and mahinga kai targets are shown in section 4.6.4.1.1 and 4.6.4.1.2.

Note: The Environmental Canterbury online audit reporting template will generate an overall audit grade based on the LOC assigned to each objective and associated target(s).

4.6.4.1 Establish the objective and targets LOC

When determining the LOC associated with meeting each target, the Certified FEP Auditor shall:

- Determine whether GMP is met as it would provide a higher LOC that targets are met;
- Make judgements based on objective evidence and identify reasons for and against their judgement, including factors that indicate achievement or not of each target.

The Environment Canterbury FEP Audit Template will include example ‘reasons for’ together with objective evidence and reasons against, which have been based on Industry-agreed GMPs.

The Certified FEP Auditor shall take into consideration the likelihood of each target being met before awarding a LOC rating for each objective.

There are three possible LOC ratings:

- High LOC

- Has appropriate evidence to demonstrate ‘target’ is being achieved AND can explain or show what/how this “practice has been undertaken AND, where applicable, what mahinga kai values are and how risks on them have been mitigated.
- Medium LOC:
 - Has appropriate evidence to demonstrate ‘target’ is being achieved BUT cannot explain or show what/how this “practice has been undertaken AND, where applicable, what mahinga kai values are and how risks on them have been mitigated;
OR
 - Does not have appropriate evidence to demonstrate ‘target’ is being achieved BUT can explain or show what/how this “practice has been undertaken AND, where applicable, what mahinga kai values are and how risks on them have been mitigated;
OR
 - The observed infrastructure is not fit for purpose AND the risk on mahinga kai is not managed but there is a plan in place for its upgrade.
- Low LOC:
 - Does not have appropriate evidence to demonstrate ‘target’ is being achieved AND cannot explain or show what/how this “practice has been undertaken AND, where applicable, what mahinga kai values are and how risks on them have been mitigated;
OR
 - The evidence and any explanation provided demonstrate the farm is not meeting the ‘target’ required and therefore the objective required by Environment Canterbury.

4.6.4.1.1 Nutrient Losses Targets

Specific requirements relating to the assessment of LOC for Nutrient management Objective 2 are shown in Tables 2 and 3 below.

Table 2: Single N loss and the NLL LOC matrix

This table is applicable where there is a single NLL for the property as described in the resource consent.

LOC	NLL Met	Target 1		Objective 2
		GMP in place or beyond where required	Limitation of model used to estimate N loss	LOC
High	Y	Y	N/A	High at best <i>dependent on other targets LOC</i>
Medium	N	Y	Y	Medium at best <i>dependent on other targets LOC</i>
Low	N	Y	N	Low
Low	N	N	Y	Low
Low	N	N	N	Low

Note: Guidance on what constitutes ‘limitations of the model used to estimate N loss’ is provided as part of Environment Canterbury’s FEP Auditor Guidance. (Need to check wording)

Table 3: Multiple N loss(es) and the NLL(s) LOC matrix

This table is applicable where there are multiple NLLs for the property as described in the resource consent.

The FEP Auditor shall determine the LOC for the target against each N loss v NLL analysis and then determine the overall grade as shown below.

Target 1		Objective 2
Overall LOC	LOC for each N Loss v NLL analysis	LOC
High	All High	High at best <i>dependent on other targets LOC</i>
Medium	1 or more Medium	Medium at best <i>dependent on other targets LOC</i>
Low	1 or more Low	Low

4.6.4.1.2 Mahinga Kai Objective LOC

Where sub-regional plan provisions include a specific mahinga kai objective the following shall apply.

- High LOC
 - High LOC objectives for each management considered;
- OR
- Medium LOC
 - Mixture of High and Medium LOC objectives for each management area considered
- OR
- Low LOC
 - Any Low LOC objective.

Note: If it can be demonstrated that one or more of the management areas (e.g. no waterbodies, no animal effluent etc) do not impact on mahinga kai values, those management areas shall not be included in the above LOC provision

Table 4 show the relationship between audit grade and objectives LOCs.

4.6.4.2 LOC in relation to Objectives

The LOC assessment for each objective shall take into consideration:

- The likelihood for the objective being met; and
- The LOC for each target included in the FEP that relate to the farmer being able to achieve the objective.

There are three LOC for Management Areas objectives:

- High (H) = The objective has probably been achieved
- Medium (M) = The objective has possibly been achieved
- Low (L) = It is unlikely that the objective has been achieved

The likelihood of meeting the objective is based on the collative targets LOC and the weight of each target related to the farm as shown below:

- All targets assessed as highs – High LOC
- Targets mostly assessed as highs, with 1 or more mediums –Medium LOC

- Targets mostly assessed as highs, with 1 or more lows – either Medium or Low LOC
- Targets mostly assessed as mediums – Medium LOC

4.6.5 Assign the overall audit grade

The overall audit grade is determined by the LOC associated with achievement of each objective.

Table 4 below shows:

- How to translate the level of confidence into an overall audit grade
- The related frequency of audit.

Table 4 – Determining Overall Audit Grading and Frequency of Audit

Objectives Level of Confidence	Overall Grade	Frequency of Audit (unless defined by a resource consent)			
		Individual consents (Consented individual properties and farming enterprises and nutrient management groups)	Farms part of an Approved ISO Accredited Audit Programme	Irrigation Scheme and Principal Water Supplier holding a resource consent with an NLL, HWRRP Collective	Change in Management or significant change in farm systems
All H	A	3yr	In line with the timeframes of the Approved ISO accredited audit programme	4yr	1yr
One or more M + Nil L + on track of meeting objective ^(*)	B	2yr		2yr	1yr
One or more M + Nil L + off track of meeting objective ^(*)	C	1yr	1yr	1yr	Within 1yr
Any L	D	6 months	6 months	6 months	Within 6 months

() It shall be noted that when not all the targets (other than the nutrient loss target of objective 1 and 2) related to an objective are met or on-track to be met, the Certified FEP Auditor shall determine whether the practices on farm can give:*

- (i) A high LOC that all objectives are “on-track” to be met to award a B grade for the audit; or*
- (ii) A medium or a low LOC that the objectives are “on-track” to be met to award a C or grade and consider the objective to be “off-track” to be met.*

When a C or D grade is awarded, the Certified FEP Auditor should include in the required actions and timeframes the provision that calculation of the farm nitrogen loss shall be prepared using annual input and not the 4-year average until a B or A grade is awarded.

The difference between a B and C grade:

- B grade: the farm is aware of the issue and has a credible documented action plan in place to address it and all objectives are on track to be met.
- C grade: the farm may or may not be aware of the issue and has no plan or inadequate plans in place to address it.

Please note: The FEP Audit Reporting Tool distinguishes “on-track” and “off-track” by the following two options when assigning the final LOC for each management area.

Further actions are required in order to meet the objective. Plans are in place to complete.

Further actions are required in order to meet the objective. Actions not yet started.

4.6.6 Frequency of audits

As shown in Table 4, timing between audits ranges as follows, unless otherwise defined by a resource consent:

- 6 months - 4 years for properties or farming enterprises that are part of an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL(s) or HWRRP Collective or Approved ISO accredited audit programme
- 6 months - 3 years for properties or farming enterprises that are not part of an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL(s) or HWRRP Collective or Approved ISO accredited audit programme.

Environment Canterbury reserves the right to conduct farm visits before the next audit for compliance purposes.

In addition to Irrigation Scheme and Principal Water Supplier holding a resource consent with an NLL(s), HWRRP Collective or approved ISO accredited audit programme status, frequency of audits is also determined by the overall audit grade.

The longer audits return time for a property or farming enterprise that receives an overall audit A grade and is part of an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL(s), HWRRP Collective or approved ISO accredited audit programme, recognises the additional support systems that Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL(s), HWRRP Collective or approved ISO accredited audit programme has in place.

Note: the date of the audit is the date that the audit was conducted. The next audit due date is calculated from the date of the audit.

Note: 'split' audits can occur in the case whereby the auditor deems it necessary to view activities that occur in different seasons e.g. irrigation and winter grazing practices. The final audit must be completed by the audit due date.

4.7 Recording, Distributing Audit Findings and Concluding the Audit

An Overview of the Recording and Distributing Audit Findings Activities is shown in Figure 7.

Within two months of completion of the Audit, the Certified FEP Auditor shall submit the audit data listed in section 4.7.6 to Environment Canterbury.

4.7.1 Preparation of audit report

On completion of the audit, the Certified FEP Auditor shall prepare a report of their findings using the Environment Canterbury FEP Audit Reporting Tool template for individual consent holders, approved ISO programmes and farming enterprises Note: where there are multiple farms such as single and multi-managed farm enterprises then there is a separate audit reporting template to use.

Irrigation Schemes, HWRRP Collectives, Principal Water Suppliers and ISO programmes can use their own audit report templates.

4.7.2 Peer review

The Certified FEP Auditor may decide to have their report peer reviewed by another Certified FEP Auditor or colleague before sending the draft audit report to the landowner. The peer review should be undertaken within a week of the audit. If the cost of this is to be charged to the farmer, it shall be included as part of the audit contract.

4.7.3 Distributing the audit report to the property owner or farming enterprise manager(s)

The Certified FEP Auditor shall provide a copy of the audit report to the consent holder within two weeks (10 working days) of the on-farm audit completion.

4.7.4 Property owner or farm enterprise manager(s) feedback

The consent holder shall be provided with an opportunity to provide feedback within two weeks (10 working days) and should be specifically asked to:

- Raise any obvious mistakes and/or misunderstandings;
- Provide any additional information that was not available at the time of the audit which may alter the audit grade; and
- Provide his/her feedback and information within two weeks (10 working days) of the date that the correspondence was sent by the auditor.

The auditor shall consider any feedback and additional information that may be provided by the property owner or farm enterprise manager(s) and if relevant revise the audit report.

In making judgements about inclusion, or not, of feedback and comments received, it is important that the auditor refers back to objective information gathered and is able to define reasons for their decisions.

4.7.5 Distributing the audit report to Irrigation Schemes or Principal Water Suppliers holding a resource consent with an NLL or HWRRP Collectives

When relevant the auditor shall provide a copy of the audit report to the Irrigation Schemes, Principal Water Suppliers or HWRRP Collectives in line with their requirements.

4.7.6 Submitting information to Environment Canterbury

No sign-off of any audit report by Environment Canterbury is required.

Consented properties and farming enterprise under single management

Within two months of completion of the audit, the Certified FEP Auditor shall submit the following information to Environment Canterbury, using the FEP Audit Reporting Tool supplied to them:

- Resource Consent Number(s) covered by the Audit containing FEP audit requirements;
- Date of Audit;
- Name of the Certified FEP Auditor
- Farm Type (Primary, Secondary and ISO Programme if applicable);
- Overall Grade (if the property falls within multiple nutrient management zones (zone), the grade will be reported against the predominant zone);
- Version of OVERSEER® or equivalent model approved by the Chief Executive of Environment Canterbury;
Nitrogen (N) loss(es) as described in the appendix of the resource consent – please note that:
 - Current year N loss(es) if less or equal to the consented NLL; or
 - Average of latest 4 years N loss(es) if current N Loss is greater than the consented NLL(s) – Losses under the same version of OVERSEER® or equivalent model approved by the Chief Executive of Environment Canterbury.

If the current year N loss(es) is/are greater than the consented NLL and the farmer does not have records of the latest 4 years N losses, the Certified FEP Auditor shall:

- Report the current year N loss(es); and
- NLL(s) as defined in the appendix of the resource consent – *please note that the NLL(s) shall be updated prior to the audit in line with the new version of OVERSEER®*;
- LOC for each target and objective (if the property falls within multiple nutrient management zones (zone), the grade will be reported against the predominant zone (based on hectares).

All FEP auditing information collected by Environment Canterbury will be considered commercially sensitive information and may be released/reported externally at an aggregated level as per the Environment Canterbury Privacy Policy.

Please note that Environment Canterbury may at any point obtain a copy of the audit report to undertake its statutory functions to determine compliance with resource consent conditions and carry out enforcement if it is deemed necessary. Any audit report(s) and supporting documents could also be selected during the Auditor's Certification re-registration assessment.

Farming Enterprises under multiple management (including Nutrient Management Groups)

- Resource Consent Number covered by the Audit containing FEP audit requirements
- For each farm:
 - Name of Certified FEP Auditor(s);
 - Date of Audit;
 - Farm Name;
 - Farm Type (primary, secondary and ISO Programme if applicable);
 - Audit grade (if the property falls within multiple nutrient management zones (zone), the grade will be reported against the predominant zone);
 - Nitrogen loss(es) as described in the appendix of the resource consent;
 - NLL(s) as described in the appendix of the resource consent - *please note that the NLL(s) shall be updated prior to the audit in line with the new version of OVERSEER®*;and

- The LOC for each target and objective (if the property falls within multiple nutrient management zones (zone), the grade will be reported against the predominant zone (based on hectares).

Irrigation Schemes and Principal Water Suppliers holding a resource consent with an NLL and HWRRP Collectives

The Certified FEP Auditor shall not submit any information to Environment Canterbury. A copy of the audit report shall be provided to the Manager of the Irrigation Scheme, Principal Water Suppliers and HWRRP Collectives.

Irrigation Schemes or Principal Water Suppliers or HWRRP Collectives shall submit a summary report to Environment Canterbury, using the FEP Audit Data Reporting Form supplied to them, containing the following information:

Note: those Irrigation Schemes and Principal Water Suppliers holding a resource consent with an NLL and HWRRP Collectives with reporting conditions that differ from the requirements shown below, Environment Canterbury may request the submission of the following data suite to facilitate the development of extension work-programmes, assess and report GMP implementation progress and effectiveness.

- A summary report:
 - Irrigation Scheme Resource Consent Number (with a nutrient load/limit)
 - Period related to the audits, i.e. Year-Year;
 - N loss(es) as described in the resource consent;
 - NLL(s) as described in the resource consent - *please note that the NLL(s) shall be updated prior to the audit in line with the new version of OVERSEER®*;
 - Numbers of farms graded A, B, C and D per primary farm (land use) type;
 - LOC per target and objective per farm type;
 - Number of farms that are repeated C/D per farm type in the past five years;
 - List of the main reasons why farms have been graded C or D;
 - Programme to improve performance of repeat C and D farms;
 - Progress report on previous identified issues; and
 - Identified illegal discharges and actions taken.

This information is to be provided annually by the end of October.

This information will be considered commercially sensitive information and may be released/reported externally at an aggregated level.

Note: Environment Canterbury may at any point request a copy of the audit reports to undertake its statutory functions to determine compliance with the Irrigation Schemes and Principal Water Suppliers and HWRRP resource consent conditions and/or Environment Management Strategy and carry out enforcement if it is deemed necessary. Any audit report and supporting documents could also be selected during the Auditor's Certification re-registration assessment.

4.7.7 Concluding the audit

The audit is completed when all activities included in the FEP Audit contract between the Certified FEP Auditor and consent holder have been undertaken (see Figure 8).

The Certified FEP Auditor shall be aware that they may be subject to disputes and complaints.

4.7.7.1 Disputes

4.7.7.1.1 Payments

Any disputes over payments for Certified FEP Auditor services shall be dealt with as part of normal business procedures by the Certified FEP Auditor and other parties to the contract (see Figure 8).

4.7.7.1.2 Audit grades and assigned required/beneficial actions

Disputes about audit findings or grading shall be addressed following a formal process.

The dispute process is cost recoverable and includes the submission of a FEP Audit Dispute Submission supported by a fee which will be paid by:

- a. The disputer paying if the dispute is unsubstantiated; and
- b. The Certified FEP Auditor if dispute is substantiated. An invoice will be sent to the Certified FEP Auditor at the end of the process.

Environment Canterbury may ask the disputer and the Certified FEP Auditor to attend an interview. The certified FEP Auditor may need to submit copies of the FEP Audit Report together with all material and evidence used to determine the audit grade and/or assigned required/beneficial actions. If the dispute is substantiated, Environment Canterbury may revoke the FEP Auditor Certification.

4.7.7.2 Complaints

Any complaints related to the conduct of a Certified FEP Auditor will be investigated by Environment Canterbury. If the complaint is substantiated, then the Chief Executive can revoke FEP Auditor Certification and inform the professional institute the Certified FEP Auditor is a member of that decision.

4.7.8 Retaining and releasing audit documents

The Certified FEP Auditor is required to keep an electronic copy of the audit report and all supporting documents for at least seven years. In the event that the Certified FEP Auditor is unable to meet this requirement then Environment Canterbury will be notified.

Unless required by law, the Certified FEP Auditor shall not disclose the contents of any audit documents, or other information obtained during the performance of audit activities, to any other party without the explicit approval of the consent holder with whom the audit contract has been entered, with the following exceptions:

- The Certified FEP Auditor contracted to carry out the follow up audit;
- Environment Canterbury for carrying out any intervention or compliance functions that may be required following the awarding of consecutive C and/or D grades; and
- Reference during the Audit Programme Review or during the FEP Auditor's Certification re-registration assessment; and
- Environment Canterbury for the purpose of carrying out quality checks on Certified FEP Auditors.

Consent holders should also retain their copy of the audit report at least seven years and pass these on to new owners and/ or managers.

Figure 7: Recording and Distributing Audit Findings Activities Overview

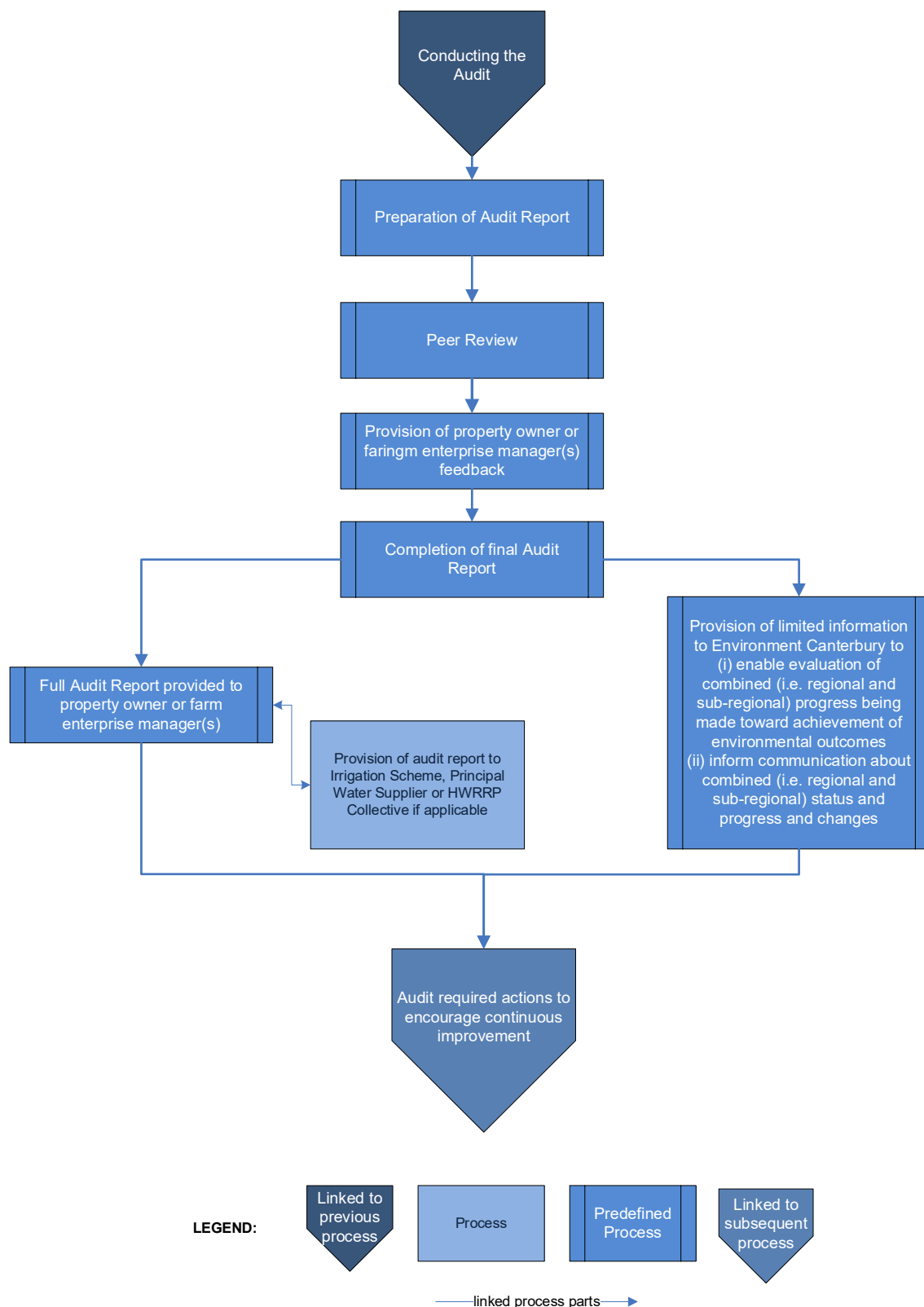
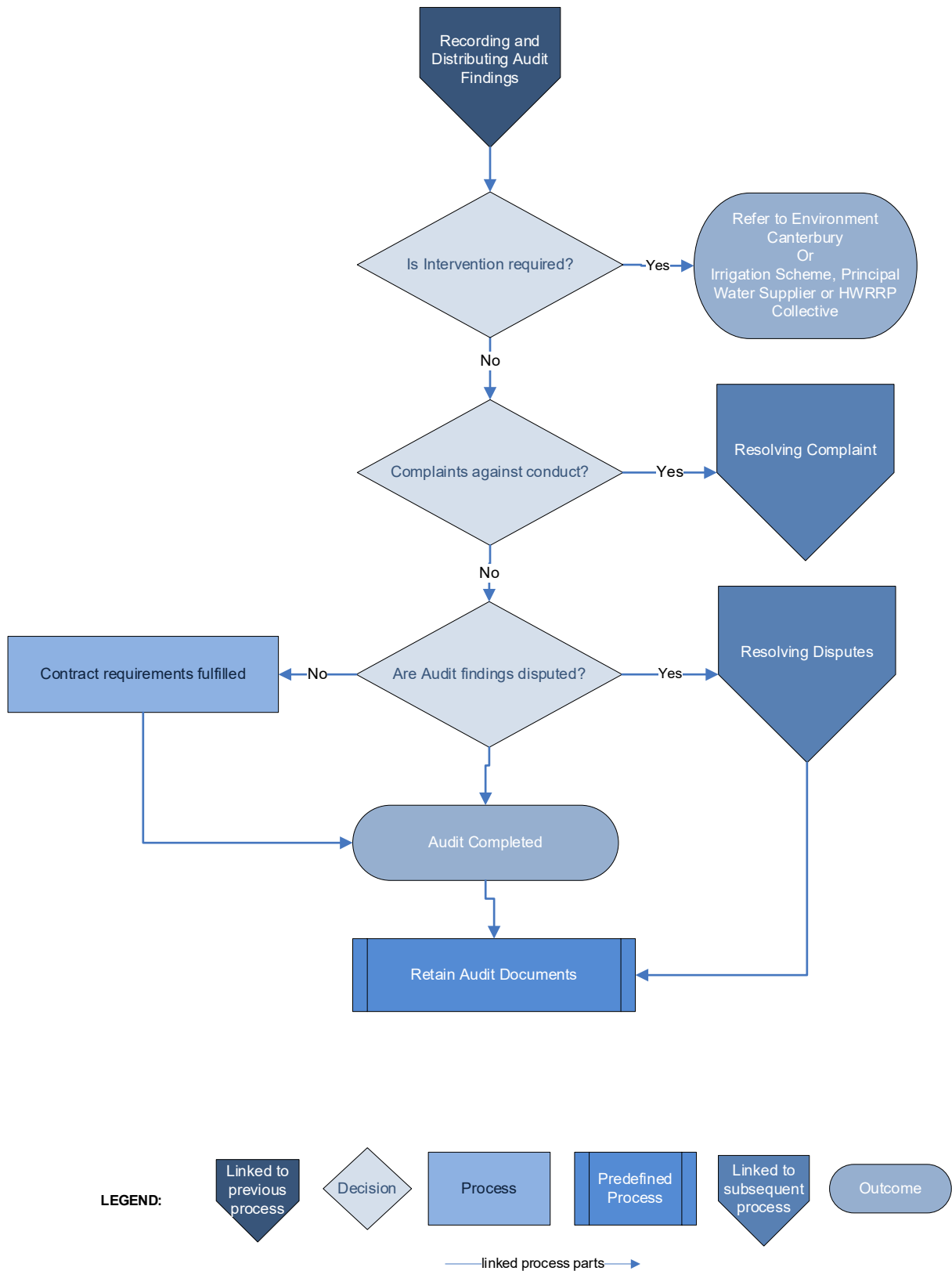


Figure 8: Concluding the Audit, Disputes, Complaints and Intervention Activities Overview



4.8 Follow-Up on Required/Beneficial Actions and Intervention

4.8.1 Follow up on required/beneficial actions

The completion and effectiveness of any audit required actions issued at the previous audit should be verified by the Certified FEP Auditor as part of follow up audit activities.

Should a B, C or D audit grading be received, the property owner or farm enterprise manager will be given a timeframe for required action(s) completion. This is decided by the auditor in line with the audit grade.

4.8.2 Intervention

Certified FEP Auditors do not have responsibility for carrying out any intervention or compliance functions, as shown in Figure 8.

Should any intervention be required following the awarding of consecutive C and/or D grades, this shall be undertaken as shown in appendix 4.1 for Individual Consents and appendix 4.2 for Irrigation Scheme and Principal Water Supplier holding a resource consent with an NLL, HWRRP Collective or approved ISO accredited audit programme. In circumstances that a site visit is required, and that visit is related to cultural matters, an opportunity for a Papatipu Rūnanga representative to attend will be provided for.

It is anticipated that within an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective, intervention will be handled by the Irrigation Scheme, Principal Water Supplier or HWRRP Collective as included in their EMS (see Figure 3 and 7).

If properties or farming enterprises are not part of an Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective but subject to a resource consent, intervention activities will be directly handled by Environment Canterbury.

Irrespective of the circumstances, Environment Canterbury retains the right to exercise enforcement powers included in the Resource Management Act 1991 (as amended).

Appendices

Appendix 1 – Pre-Audit Check and Audit Plan

Pre-audit Check Form and Plan				
Farm Details				
Farm Name Farm ID - Resource consent relevant to the audit; or - Farm Reference Number given by the Irrigation Scheme, Principal Water Supplier or HWRRP Collective.		Audit date Main Contact Telephone Number Position E-mail address Audit start time Audit meeting place		
Irrigation Scheme/Collective Name				
Resource Consent FEP Audit Requirements - Note any additional audit requirements or anomalies to the PC5, Schedule 7 requirements.		Known areas of risks - Note any areas identified in the FEP, auditor knowledge of the area, ECAN Maps e.g. community drinking water recharge zone, spring heads, wetlands, wāhi tapu, wāhi taonga etc		
Waitaki (mahinga kai and biodiversity) Selwyn (mahinga kai) Upper Waitaki FEMP				
Nutrients Assessment				
Consented Nutrient Loss Limit (NLL)				
Nutrient Discharge Allowance	Baseline	Baseline GMP Loss Rate	GMP Loss Rate	
N Loss			OVERSEER®	
Current Yr. (e.g.2015)	Consented properties - if Current Yr. N Loss is greater than consented NLL			Version/Equivalent Model used
	Previous (e.g.2014)	Previous 2 (e.g.2013)	Previous 3 (e.g.2012)	
Is Current Year N Loss greater				
GMP Loss Rate?	NLL?	Is Budget Robust?		
Y N	Y N	Y N		
Nutrient Budget Robustness: - note if Low, Medium or High Issues with Nutrient Budget: - note issues with nutrient budgets and inputs/assumptions to check at farm visit				
Previous Audit				
Date of Previous Audit: Previous Audit Grade: Required Actions to follow-up at Audit: Other issues flagged by previous auditor:				

Farm Environment Plans			
Template/Schedule 7 compliant?	FEP relates to consented farm area? FEP covers any additional FEP consent requirements? All maps included?		
Geographical Analysis			
Erosion Area to be visited			
Wind		Water	
Waterways to be visited			
Stock Exclusion	Riparian	Crossing	Mahinga kai
Point source contamination site to be visited			
Silage Pits	Offal Pits	Waste Pits	Compost Heaps
Other areas of interest to be visited			
Activities requested by farmer to view			
Expectations of property owner			
Health and Safety and Biosecurity Requirements			

Appendix 2 – Environment Canterbury FEP Audit Template

Please note that the electronic version of the audit report template is available to all Certified FEP Auditors.

The Certified FEP Auditor shall be aware that the template contains standardised:

- Reason for and against the assessment based on the Industry-agreed Good Management Practices (GMPs) relating to water quality (18 September 2015). As this list is not exhaustive, Certified FEP Auditors can add their own comments to provide more detail.

The above standardised components of the template have not been included in this Manual as they may change in line with changes in Good Management Practices and avoid continuous update of this Manual and the electronic version of the template. The electronic version of the template will be update online with changes in Good Management Practices which may affect the standardised components of the template. A copy of the current Industry-agreed Good Management practices related to water quality is available online at <https://ecan.govt.nz/your-region/farmers-hub> or hardcopies are available upon request from Environment Canterbury.

Appendix 3 – Audit Data Reporting Forms

Please note that the electronic version of the audit report data form is available to all the following parties and must be used to report FEP Audit data:

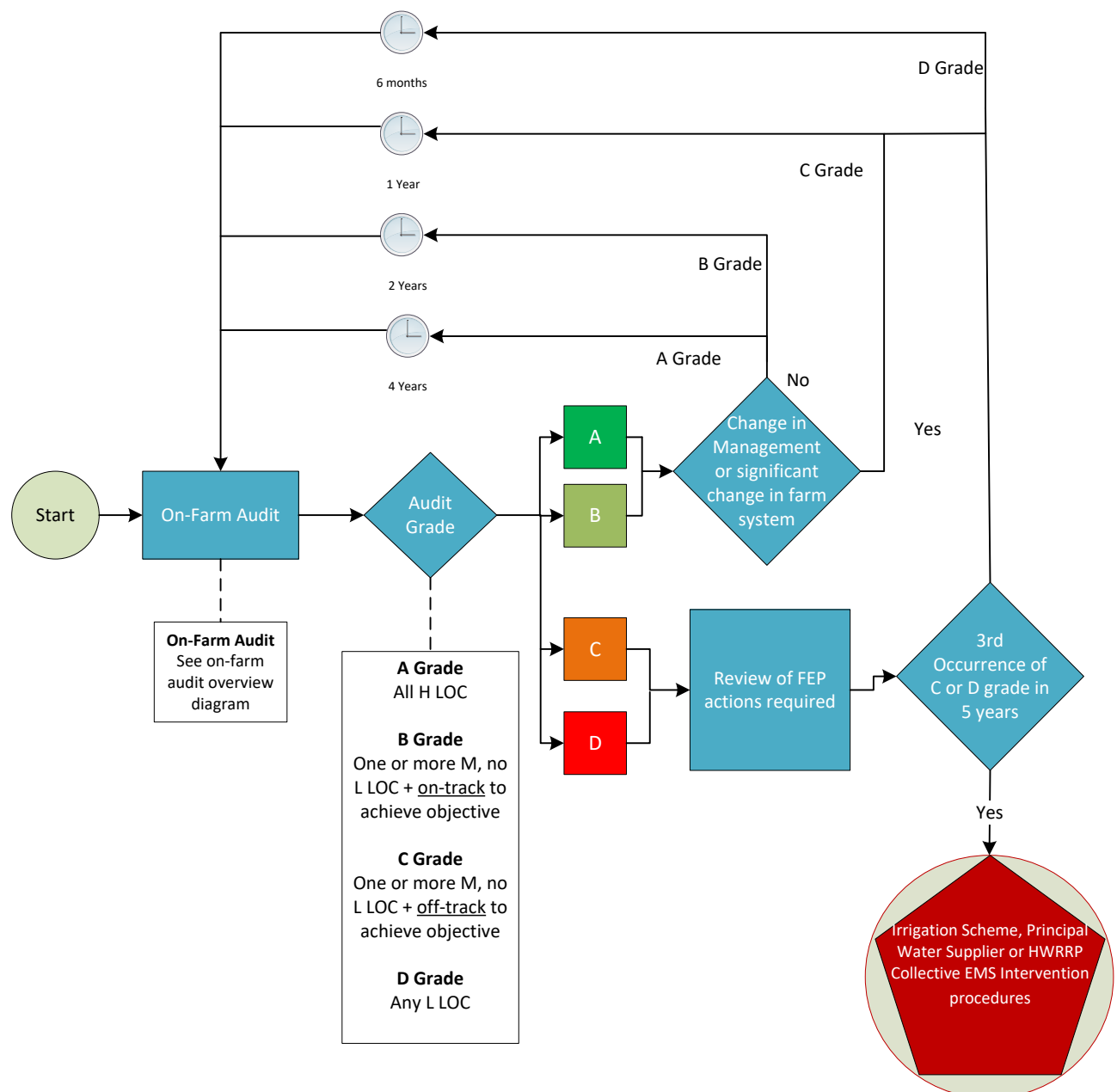
1. Certified FEP Auditors;
2. Irrigation Schemes and Principal Water Suppliers holding a resource consent with a NLL;
3. HWRRP Collectives; and
4. Farming enterprises multi management.

Note: it is expected that FEP audits for individual consent holders including ISO Programmes is completed using the online tool provided.

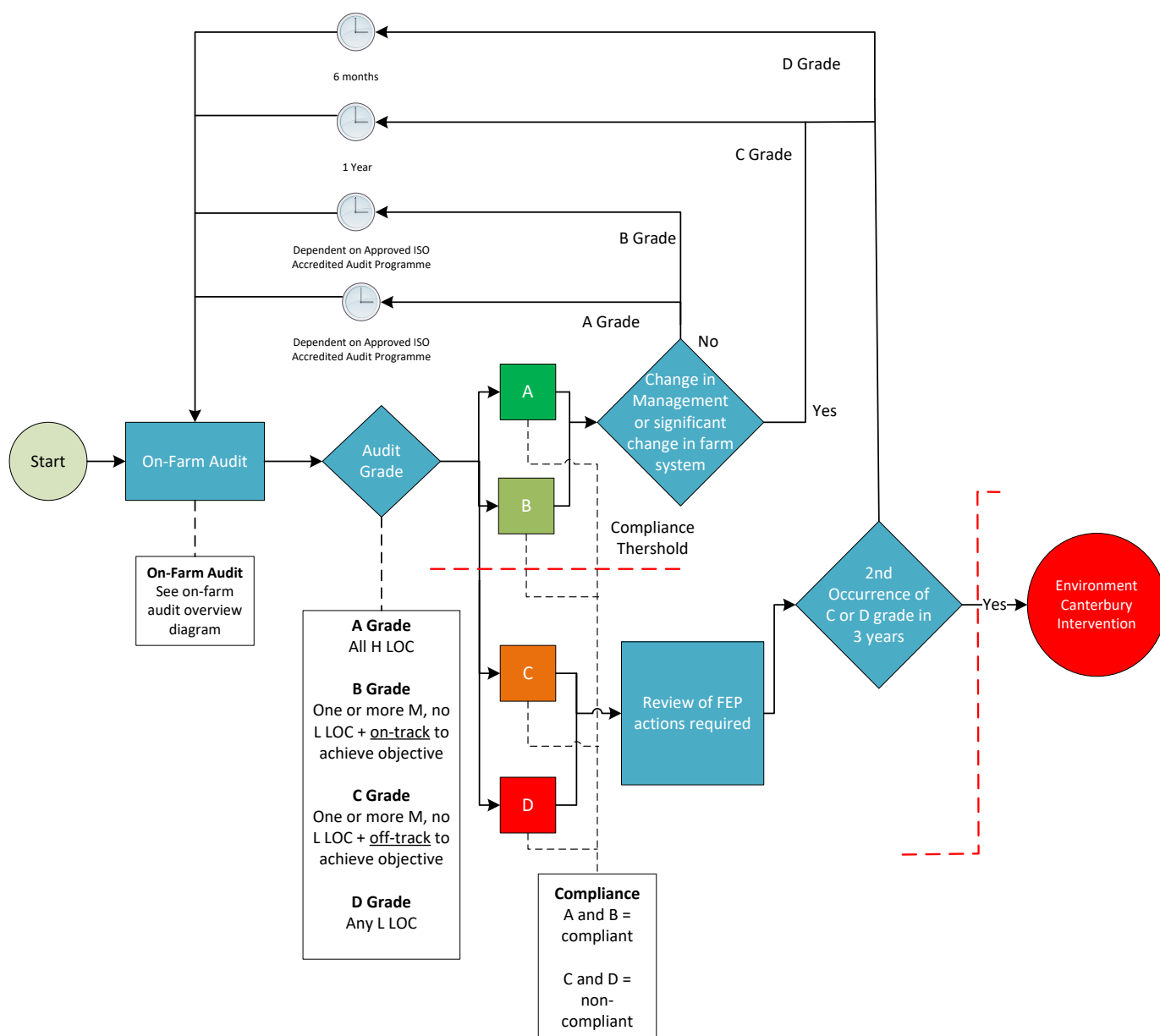
Environment Canterbury can request at any time that the Certified FEP Auditor submit a copy of the FEP and/or the nutrient analyses reference that has been audited.

Appendix 4 – Process for Determining Overall FEP Audit Grade and Timing

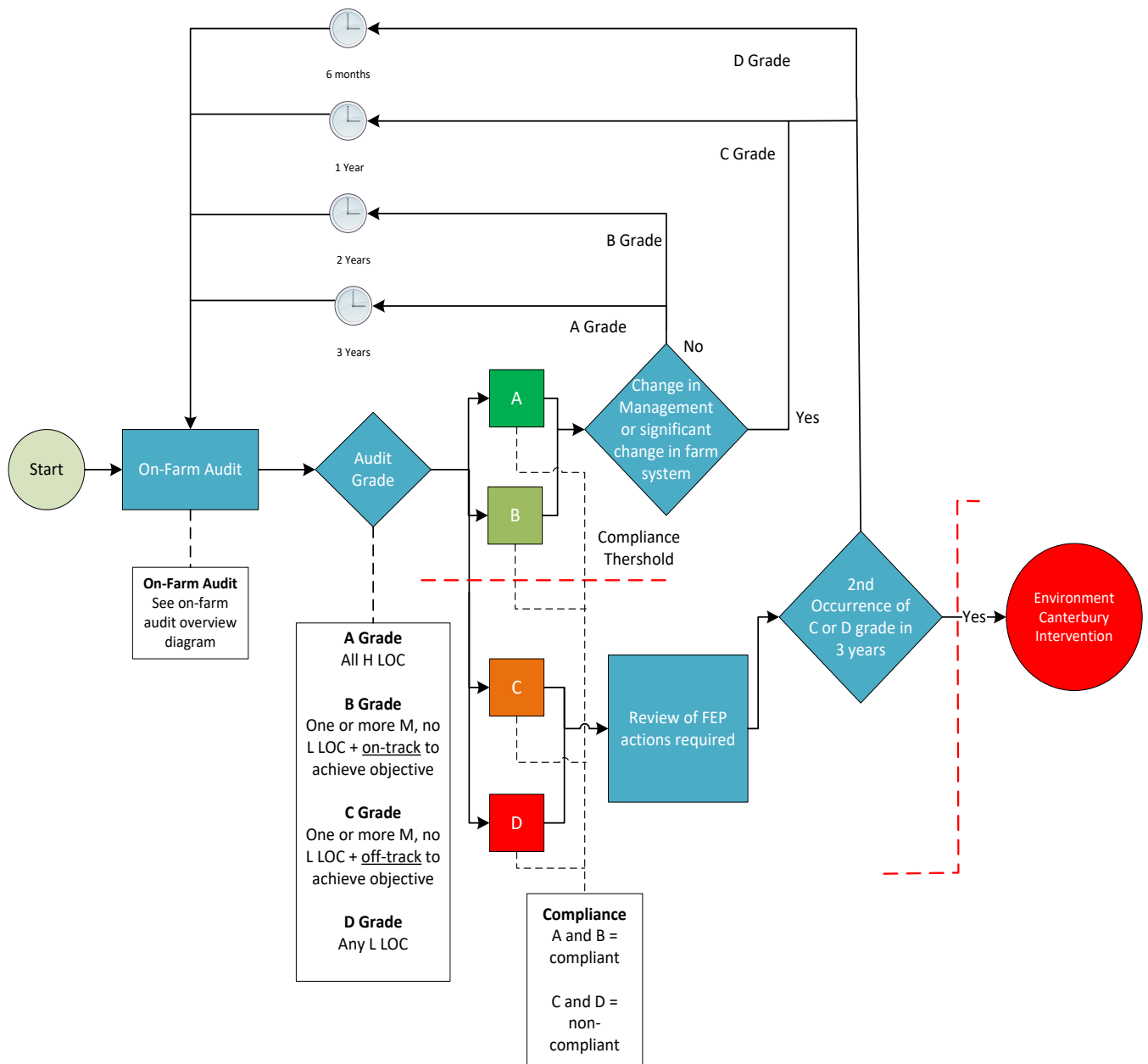
Appendix 4.1: FEP Grading and Timing – Irrigation Scheme and Principal Water Supplier holding a resource consent with an NLL, and HWRRP Collective process



Appendix 4.2: FEP Grading and Timing – Consented Properties and Farming Enterprises (single and multiple management) linked to an approved ISO accredited audit programme process



Appendix 4.3: FEP Grading and Timing – Consented Properties and Farming Enterprises (single and multiple management)



Appendix 5 – Useful Contacts

The contacts shown below may be used by the Certified FEP Auditor to seek advice and support.

Environment Canterbury Regional Council	Calling from Christchurch: (03) 353 9007 Calling from any other area: 0800 324 636 (0800 EC INFO)
Environment Canterbury Pollution Hotline	Calling from Christchurch: (03) 366 4663 Calling from any other area: 0800 76 55 88
Beef and Lamb	(03) 357 0693
DairyNZ	(03) 321 9016
Deer Industry New Zealand	(04) 473 4500
Department of Conservation	Aoraki/Mt Cook Office: (03) 435 1819 Arthur's Pass Office: (03) 318 9211 Christchurch Office: (03) 371 3700 Geraldine Office: (03) 693 1010 Kaikoura Office: (03) 319 5641 Rangiora Office: (03) 313 0820 Twizel Office: (03) 435 0802
Federated Farmers	(03) 307 8145
Fish and Game	North Canterbury: (03) 313 5728 or 0800-FISHANDGAME (0800 347 426) Central South Island: (03) 615 8400
Fonterra	(09) 374 9000
Forest and Birds	(03) 940 5523
Foundation for Arable Research	(03) 345 5783
Horticulture New Zealand	(04) 472 3795
Irrigation New Zealand	(03) 341 2225
New Zealand Institute of Primary Industry Management	(04) 939 9134
Ministry for the Environment	(04) 439 7400
Ministry of Primary Industry	General enquiries: 0800 00 83 33 Report exotic pests/diseases: 0800 80 99 66
Oceania Dairy	(03) 686 6403
NZPork	(03) 357 1407
Synlait Milk	(03) 373 3000
Te Rūnanga O Ngāi Tahu	0800 KAI TAHU (0800 524 8248)
Westland Milk Products	(03) 371 1600

Appendix 6 – Definitions

Please note that the definitions listed in this appendix are relevant for this means of this Manual only

Action plan – means a list of tasks to address the issues raised the audit. This plan shall be prepared by the Manager of the property, farming enterprise or Environment Manager of Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL or HWRRP Collective

Adjusted Nitrogen Baseline – means the discharge of nitrogen below the root zone as modelled with the current version of Overseer as represented by the Adjusted Overseer Inputs provided with the application.

Adjusted Overseer Inputs – means the Nitrogen Baseline inputs amended to represent the good management practices for Hinds/Hekeao Plains Area or Selwyn Te Waihora and were modelled in accordance with the Overseer Best Practice Data Input Standards. They can be updated to reflect the current Overseer Best Practice Data Input Standards but must still describe the same activity.

Advice – means technical guidance given to a landowner regarding the practices that could be implemented to meet the objectives and targets of the FEP.

Alternative model – means model used to calculate Equivalent Baseline GMP or GMP Loss Rates by applying:

- a. Modelling proxies equivalent to those in Schedule 28 of the LWRP to that part of the farming activity where that is practicable and appropriate; and
- b. Alternative methods and modelling proxies that are representative of good management practice to the balance of the farming activity.

Approved International Standards Organisation (ISO) accredited audit programme – means an ISO accredited audit programme has been approved by the Chief Executive of Environment Canterbury as an equivalent programme to the Canterbury FEP Audit Programme. These are typically nationally or internationally certified farming assurance programme led by industry to assist the implementation of good management practices or better at farm level to reduce the risk of health, safety and environmental issues

Audit – means an assessment of the performance of a farming activity against the objectives and targets of a Farm Environment Plan, and includes identifying any remedial actions to be carried out to achieve the objectives and targets of the Farm Environment Plan, and an overall grading based on the assessment of the farming activity.

Baseline GMP Loss Rate – means the average nitrogen loss rate below the root zone, as estimated by the Environment Canterbury Online Farm Portal, for the farming activity represented by the Nitrogen Baseline OVERSEER® input files provided with the application if operated at Good Management Practice. If the Baseline GMP Loss Rate cannot be generated by the Environment Canterbury Online Farm Portal, it means the Nitrogen Baseline

Beneficial action – means an action(s) to improve farm performance in order that FEP objectives and/or targets can be met or to promote continuous improvement

Canterbury Farm Environment Plan (FEP) Audit Programme – means a process and procedures to satisfy the requirements of Schedule 7 of the Land and Water Regional Plan

Certified Farm Environment Plan (FEP) Auditor – means a person that, either

- a. Is approved by the Chief Executive of Environment Canterbury as meeting the following criteria and is registered on the Environment Canterbury website as a Certified Farm Environment Plan Auditor or
- b. Is a member of an International Standards Organisation accredited audit programme, that has been approved by the Chief Executive of Environment Canterbury, as including audit criteria equivalent to that set out in Part C of Schedule 7:
- c. Has at least 5 years' professional experience in the management of pastoral, horticulture or arable farm systems; and
 - i. holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand Agriculture from Massey University; or
 - ii. holds a tertiary qualification in agricultural science or demonstrates an equivalent level of knowledge and experience; and
2. Is a current member of a Professional Institute that requires members to subscribe to a Code of Ethics and has a procedure in place for dealing with complaints made against members; and
3. Demonstrates to Environment Canterbury, proficiency in the auditing of Farm Environment Plans against the matters set out in Part C of Schedule 7.

Certified Nutrient Management Advisor – means a person certified as meeting the Nutrient Management Advisor Certification Programme

Change in management – means a change in the ownership or the management structure and/or person in charge of the day-to-day operations of the farm

Continuous improvement – means an ongoing effort to improve processes and practices based on an incremental improvement over time or innovation all at once. The implementation of processes and practices are evaluated and based on their efficiency, effectiveness and flexibility

Crop Available Water (CAW) – means the rainfall equivalent depth of total available water by a specified crop

Equivalent Baseline Good Management Practice (GMP) Loss Rate – means a nitrogen loss rate, expressed in kg per hectare per annum, for a 48-month consecutive period within the period 01 January 2009 to 31 December 2013, and that has been calculated by applying:

- a. Modelling proxies equivalent to those in Schedule 28 of the LWRP to that part of the farming activity where that is practicable and appropriate; and
- b. Alternative methods and modelling proxies that are representative of good management practice to the balance of the farming activity.

For the purposes of clarity, in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed in the period 01 January 2009 to 31 December 2013, the calculation will be on the basis that the dairy farming activity is operational.

Equivalent Good Management Practice (GMP) Loss Rate – means the average nitrogen loss rate below the root zone, expressed in kg per hectare per annum, for the most recent four-year period and that has been calculated by applying:

- a. Modelling proxies equivalent to those in Schedule 28 of the LWRP to that part of the farming activity where that is practicable and appropriate; and
- b. Alternative methods and modelling proxies that are representative of good management practice to the balance of the farming activity.

Environment Management Strategy (EMS) – means a document that outlines the Irrigation Scheme or Principal Water Supplier holding a resource consent with an NLL and HWRRP Collective’s programme to implement and administer on-farm (through the FEPs)

Farm Environment Plan (FEP) – means a tool to recognise on-farm environmental risk and set out a programme to manage those risks. An FEP must meet the criteria set in Schedule 7 of the LWRP Part B – Farm Environment Plan Default Content or be an Industry prepared FEP that has been approved by the Chief Executive of Environment Canterbury.

Farming enterprise single management – means an agglomeration of parcels of land held in single management/ownership that constitutes a single operating unit for the purpose of nutrient management

Farming enterprise multi management – means an agglomeration of parcels of land held in multiple management/ownership that constitutes a single operating unit for the purpose of nutrient management

Farm Portal – means the nutrient management database accessed at www.farmportal.ecan.govt.nz and that is used to derive a Baseline GMP Loss Rate and Good Management Practice Loss Rate in accordance with Schedule 28 of the LWRP.

Farm Portal Nutrient Loss Report – means the summary of nutrient losses based on OVERSEER® or equivalent model been approved by the Chief Executive of Environment Canterbury and GMP loss rates

Good Management Practices (GMP) – means the practices described in the document entitled “Industry-agreed Good Management Practices relating to water quality” - dated 18 September 2015.

Good Management Practice (GMP) Loss Rate – means the average nitrogen loss rate below the root-zone, as estimated by the Farm Portal, for the farming activity carried out over the most recent four-year period, if operated at good management practice.

For the purposes of clarity, in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed in the period 01 January 2009 to 31 December 2013, the calculation will be on the basis that the dairy farming activity is operational.

Hurunui Waiau River Regional Plan (HWRRP) Collective – means a formal group of farmers and/or farming enterprises working together to decrease and manage the environmental effects of farming activities (i.e. land use) on water quality (i.e. reduce Nitrogen and Phosphorus leaching). Collectives are required to register with Environment Canterbury an Environment Management Strategy (EMS) on or before the 01 January 2017

Irrigation Scheme – means a trust, company, incorporated society or other legal entity that holds a resource consent to take and supply water to more than one property

Ineffective Farm Environment Plan (FEP) practices – means:

- a. Practices that do not meet GMP or sector specific GMP; and/or
- b. No plan in place to meet one or more targets.

Level Of Confidence (LOC) – means a rating (represented as High, Medium or Low) determined by Certified FEP Auditor reflecting the level of confidence that the objectives and targets in FEP are being met or that progress towards meeting them is being made

Management area – means the areas of farm management practice as set out below:

- a. Nutrients
- b. Irrigation and water use
- c. Cultivation and Soil Structure
- d. Animal effluent and Solid Animal Waste
- e. Waterbodies (riparian areas, drains, rivers, lakes, wetlands)
- f. Point sources (offal pits, farm rubbish pits, silage pits)

Management objective (objective) – means the overarching outcome sought in relation to each Management Area

NCheck – means the system approved by the Chief Executive of Environment Canterbury approved the use of NCheck for the use of land for:

1. For horticulture or arable farming until 2020 and for Selwyn Te Waihora Catchment until 2022; and
2. Selwyn Te Waihora catchment properties with nitrogen losses less than 15Kg N/ha/yr to generate:
 - A nitrogen baseline or nitrogen loss calculation; and
 - An updated nitrogen baseline or nitrogen loss calculation for a FEP audit when the nitrogen baseline or nitrogen loss calculation used in the Farm Environment Plan was generated using 'NCheck'.

For the purposes of the approval described in bullet point 1 above;

- a. The use of land for a farming activity for horticulture is a farm with intensive vegetable rotations greater than 80% of the time; and
- b. The use of land for a farming activity for arable farming is a farm with a cropping rotation on more than 50% of the property and does not include properties that contain a milking platform for cows.

Nitrogen Baseline – means:

- a. The discharge of nitrogen below the root zone, as modelled with OVERSEER, (where the data is inputted into the model in accordance with OVERSEER Best Practice Data Input Standards), or an equivalent model approved by the Chief Executive of Environment Canterbury, averaged over a 48 month consecutive period within the period 1 January 2009 to 31 December 2013, and expressed in kg per hectare per annum, except in relation to [Rules 5.46, 5.56, 5.58A](#) and [5.62](#), where it is expressed as a total kg per annum from the identified area of land; and
- b. In the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed in the period 01 January 2009 to 31 December 2013, the calculation under (a) will be on the basis that the dairy farming activity is operational; and
- c. If OVERSEER is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data for the same period as used in (a) above.

New irrigation infrastructure – means either brand new installed infrastructure or infrastructure installed within the current irrigation season.

Nitrogen loss calculation – means the discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER®)

Best Practice Input Standards), or an equivalent model approved by the Chief Executive of Environment Canterbury. If OVERSEER® is updated, the most recent version is to be used

Nutrient Discharge Allowance – means the discharge of nitrogen below the root zone as modelled with the current version of OVERSEER® (or an equivalent model approved by the Chief Executive of Environment Canterbury) as represented by the original OVERSEER® input files provided with the application.

Nutrient Loss Limit (NLL) – means either:

- Nutrient Discharge Allowance;
- Nitrogen Baseline²
 - Refer to an OVERSEER® budget for Selwyn Te Waihora, Hinds and South Coastal Streams catchments;
 - To be found in the Farm Portal Nutrient Loss Report elsewhere in region; and
 - Properties who have used NCheck (Region wide arable and horticulture properties or Selwyn Te Waihora catchment properties with N losses less than 15kg N/ha/yr) please ensure a Farm Portal Nutrient Loss Report has been re-run for the baseline 2009-13 period.
- Baseline GMP or GMP Loss Rate (found in the Farm Portal Nutrient Loss Report) whichever is the lesser; or
 - Equivalent Baseline GMP or Equivalent GMP Loss Rate (calculated using the alternative model to the Farm Portal); and/or
 - Relevant reductions.

Nitrogen Baseline OVERSEER® input files – reflect clause A or B of the Nitrogen Baseline definition in the resource consent appendix, as defined below, and were inputted into the model in accordance with the OVERSEER® Best Practice Data Input Standards. They can be updated to reflect the current Overseer Best Practice Data Input Standards but must still describe the same activity.

Clause A: “the discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER® Best Practice Data Input Standards), or an equivalent model approved by the Chief Executive of Environment Canterbury, averaged over a 48 month consecutive period in the years of the period of 2009 – 2013 inclusive, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62 where it is expressed as a total kg per annum from the identified area of land”

OR

Clause B: “in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed in the period 01 January 2009 – 31 December 2013, the calculation under (a) will be on the basis that the dairy farming activity is operational”

Nutrient Management Groups: means a farming enterprise with more than one FEP

Practice – means an action or bundle of actions that contribute to achievement of the target

Principal Water Supplier – means a publicly or privately-owned supplier of water which is conveyed and distributed to constituent irrigation schemes, community and/or stock-water schemes, hydro-electricity generators and/or other users of the water.

Profile Available Water (PAW) – is the difference between field capacity and wilting point and represents the total water available to a depth of 1 m expressed as millimetres of water.

Property – means any contiguous area of land, including land separated by a road or river, held in one or more than one ownership, that is utilised as a single operating unit, and may include one or more certificates of title

Relevant reductions – means N Loss reductions as indicated in a land use resource consents.

Required action – means an action(s) to improve farm performance in order that FEP objectives and/or targets can be met or to promote continuous improvement

Sensitive Areas – means areas of mahinga kai and biodiversity values.

Significant change in farm systems – means whole farm operation conversions, including but not limited to, converting between dairy support, dairy platform, sheep & beef and cropping; and also, any introduction of a new stock type to the farm, e.g. deer or wintering dairy cows. Changes such as, varying the type of crop grown or varying the relative proportions of stock types do not constitute a farm system change

Targets – means a measurable, auditable statement that contributes to achievement of the management objective as outlined in

Water Holding Capacity (WHC) – means the volumetric ratio of all water contained in a layer or depth of soil at field capacity, including that held too tightly for plants to access

Winter grazing – means the grazing of cattle within the period of 1 May to 30 September, where the cattle are contained for break-feeding in-situ brassica and root vegetable forage crops or for consuming supplementary feed that has been brought onto the property

Environment Canterbury offices

Christchurch

200 Tuam Street
PO Box 345
Christchurch 8140

P 0800 324 636

Timaru

75 Church Street
PO Box 550
Timaru 7940

Kaikōura

96 West End
PO Box 59
Kaikōura 7340

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