

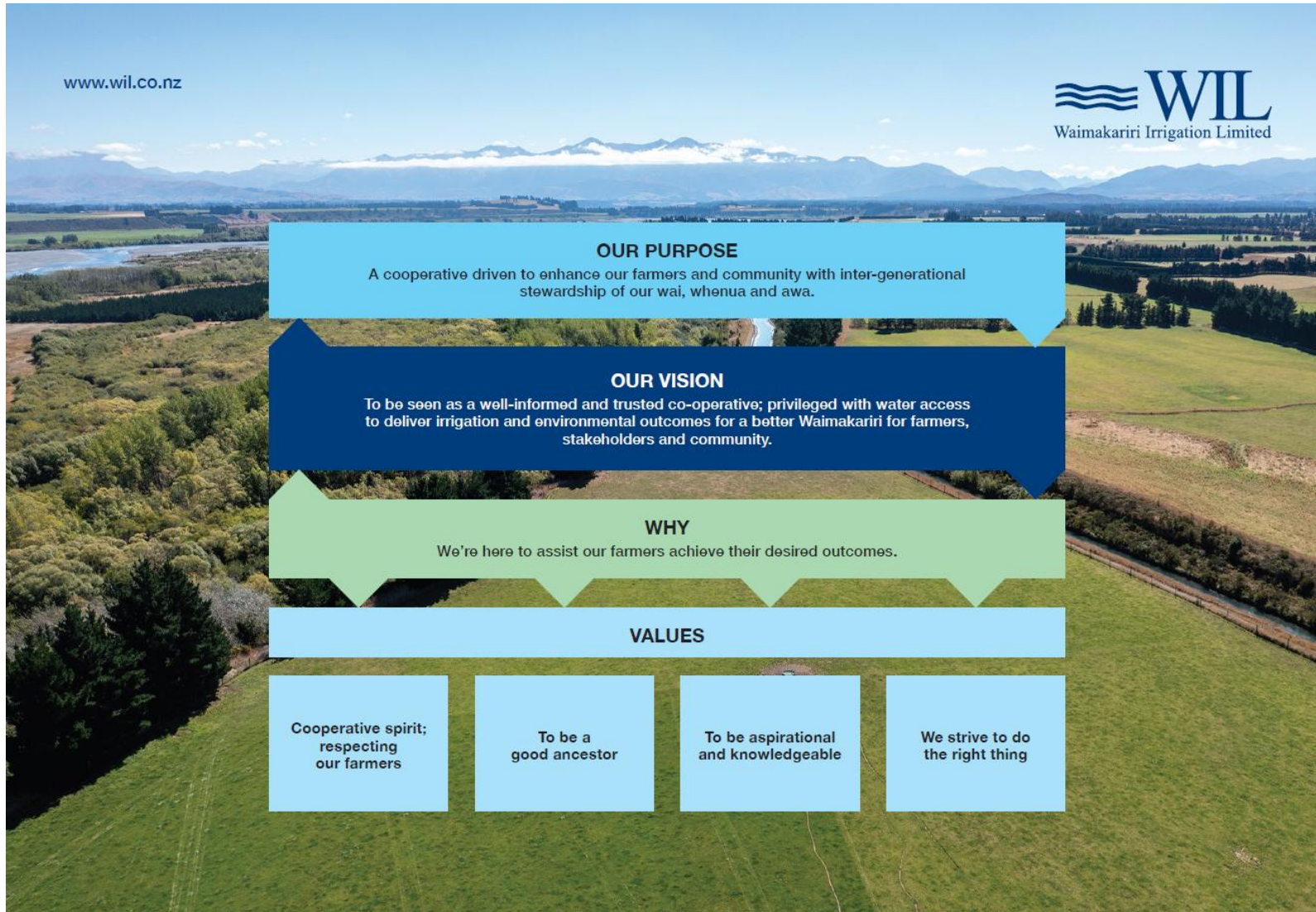


Environmental Management Strategy
(EMS)

CRC252218

February 2026
V3.1

WIL Mission Statement



www.wil.co.nz

WIL
Waimakariri Irrigation Limited

OUR PURPOSE
A cooperative driven to enhance our farmers and community with inter-generational stewardship of our wai, whenua and awa.

OUR VISION
To be seen as a well-informed and trusted co-operative; privileged with water access to deliver irrigation and environmental outcomes for a better Waimakariri for farmers, stakeholders and community.

WHY
We're here to assist our farmers achieve their desired outcomes.

VALUES

- Cooperative spirit; respecting our farmers
- To be a good ancestor
- To be aspirational and knowledgeable
- We strive to do the right thing

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1 Introduction

1.1 WIL Scheme Overview

The Waimakariri Irrigation Ltd (WIL) scheme (referred to as “the scheme” throughout this document) was officially opened on 30th October 1999. The scheme is run-of-river with resource consent to take 11.041 cubic metres of water per second from the Waimakariri River at an intake located at Browns Rock. Extraction of water is dependent on flows of the Waimakariri River, with restrictions imposed when the river drops below levels set by Environment Canterbury (ECan)¹. These restrictions have been developed to protect the rivers diverse ecosystems and freshwater habitats.

Water is delivered via nearly 1,100 kilometres of irrigation and stockwater open races to around 161 shareholders comprised of a mix of lifestyle, smaller land holdings, and larger commercial farming entities. The properties which the scheme supplies water for irrigation are located entirely between the Waimakariri and Ashley/Rakahuri Rivers. It is important to note WIL water is often mixed with other on-farm sources, such as shareholders’ individual groundwater takes, so it is difficult to determine exactly how much area is irrigated by WIL water alone. However, within the schemes collective nutrient discharge consent (CRC252218) command area of around 32,000 hectares, there is a total of around 25,000 hectares irrigated.

Farms that receive scheme water and associated properties have their nutrient discharge to groundwater covered by the schemes nutrient discharge consent, CRC252218 or any replacement of. The discharge consent is broken into three farm categories:

- Schedule ‘A’ (~29,764 hectares²): Shareholder farms (or associated blocks) that trigger the need for a Farming Land Use consent (as per the LWRP chapter 8 triggers) that rely on the WIL nutrient discharge consent to authorise the discharge of nutrients from farming.
- Schedule ‘B’ (~1,061 hectares¹): Shareholder farms that would be considered a Permitted Activity (PA) under the LWRP chapter 8 triggers.
- Schedule ‘C’ (~647 hectares¹): Shareholder farms that hold a farming land use consent that do not rely on the WIL nutrient discharge to authorise the discharge of nutrients from their farming activity.

The shareholders farms are dominated by dairy and dairy support (~80.57% of the scheme), with sheep & beef, arable, lifestyle, and deer making up the remainder of the land. Water storage for security in dry seasons is becoming a priority within the region, with a number of on-farm storage ponds existing and the scheme working toward implementing scheme wide storage under the Burnt Hill Storage Limited entity.

The scheme is working closely with shareholders and other stakeholders to ensure the environmental sustainability of the Waimakariri region is protected and enhanced. The scheme is continually looking to improve outcomes for the region by investing in infrastructure, supporting shareholders to achieve Good Management Practices (GMP) and beyond, and undertaking biodiversity improvement/enhancement projects.

¹ Environment Canterbury (ECan) means the Canterbury Regional Council

² On 15 February 2026

1.2 Application of the EMS

This Environmental Management Strategy (EMS) applies to all blocks that are covered by Schedule 'A' and 'B' of the WIL nutrient discharge consent CRC252218 (refer to the Nutrient Management Policy). Those parties covered by the WIL nutrient discharge consent agree that, in order for the scheme to administer and implement the EMS;

- they shall supply to WIL, or enable access to WIL, all information required to ensure compliance with CRC252218 (including without limitation OverseerFM account admin access);
- WIL may provide that information to any third parties for compliance reporting purposes.
- Inform WIL of any changes that have occurred beyond the authorised land use documents (appendix 6).

1.3 Non-WIL Shareholders

Non-WIL Shareholders have the ability to join the WIL nutrient discharge consent provided they can adhere to the conditions stipulated within the WIL nutrient discharge consent and scheme requirements. Non-WIL shareholders would have to apply to WIL management and the Board of Directors for approval to join the schemes nutrient discharge consent. If non-WIL shareholders join the WIL nutrient discharge consent, they would be bound by the requirements of this EMS and would agree to fall into the WIL compliance monitoring programme and the related penalties.

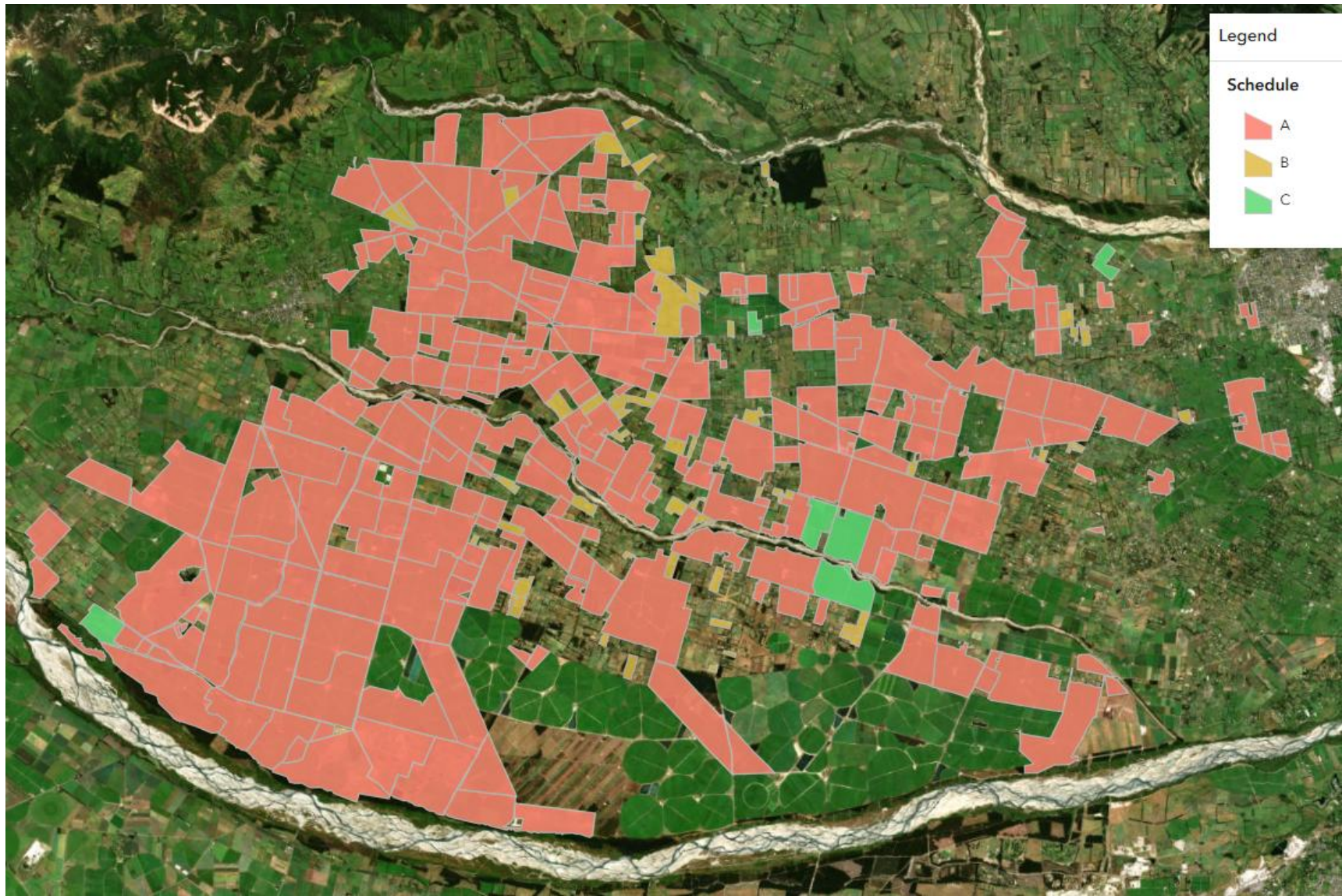


Figure 1 WIL Associated Properties and Consent Schedule (February 2026)

2 Resource Consent Overview

WIL holds a range of resource consents authorising the establishment, operation, and maintenance of the irrigation scheme, which are summarised in Table 1 below. This EMS has been prepared specifically to satisfy the requirements of consents CRC252218 (nutrient discharge consent conditions 13-16) and CRC166677 (surface water take consent condition 8) and any replacements of.

Table 1a WIL Resource Consents

Waimakariri Irrigation Limited Consents					
CONSENT NUMBER	STATUS	ACTIVITIES	DESCRIPTION	Date Issued	Expiry Date
CRC252218	Issued - Active	Discharge Contaminant into Land to Water, Discharge Contaminant onto Land to Water	Discharge Consent	10-Dec-25	01-Jul-37
CRC952566.1	Issued - Active	Works in Bed to Divert Water	Browns Rock Tunnel interface with irrigation scheme	8-Oct-99	18-Nov-31
CRC952567.1	Issued - Active	Divert Surface Water, Use Surface Water	Intake, divert flow into twin intakes	8-Oct-99	18-Nov-31
CRC952568.1	Issued - Active	Install Structure in Bed	Intake, to construct	8-Oct-99	18-Nov-31
CRC952573.1	Issued - Active	Install Structure in Bed	Construct and use discharge structure Cust Main Drain	8-Oct-99	18-Nov-31
CRC952578.1	Issued - Active	Install Structure in Bed	Siphon Eyre River	8-Oct-99	18-Nov-31
CRC166677	Issued - Active	Take Surface Water, Use Surface Water	Take and Use consent 11,041lps	8-Apr-16	18-Nov-31
CRC952575.1	Issued - Active	Install Structure in Bed	Construct and use discharge structure Ashley River	8-Oct-99	18-Nov-31
CRC952577.1	Issued - Active	Install Structure in Bed	Siphon Cust River	8-Oct-99	18-Nov-31
CRC952571.1	Issued - Active	Discharge Water into Water	Discharge water into bed of Eyre River up to 3,000lps	8-Oct-99	18-Nov-31
CRC952572.1	Issued - Active	Install Structure in Bed	Construct and use discharge structure Cust River	8-Oct-99	18-Nov-31
CRC040300	Issued - Active	Dam Surface Water	Buffer Pond	19-Nov-03	19-Nov-38
CRC182685	Issued - Active	Install Structure in Bed	Intake, to excavate, disturb and use intake and buffer pond	27-Nov-17	31-Mar-41

CRC084773	Issued - Active	Install Structure in Bed, Works in Bed to Maintain	Siphons Cust & Eyre Rivers	26-Feb-09	24-Feb-44
CRC120610	Issued - Inactive	Dam Surface Water	Wrights Road Storage (WRS) 8.3Mm3	28-Aug-20	28-Aug-55
CRC122897	Issued - Inactive	Deposit Substance, Earthworks	WRS Excavation	28-Aug-20	28-Aug-55
CRC122898	Issued - Inactive	Use Land	WRS Store Diesel	28-Aug-20	28-Aug-55
CRC122900	Issued - Inactive	Discharge Contaminant into Land to Water	WRS Stormwater Discharge	28-Aug-20	28-Aug-55
Lapse date extensions for CRC120610, CRC122897, CRC122898, CRC122900 have been granted until 30 th September 2027.					
CRC240322	Issued - Inactive	Deposit Substance	Settling Pond (SP) Disturb water way	30-Oct-25	30-Oct-31
CRC240323	Issued - Inactive	Discharge Water into Water	SP Deposit silt	30-Oct-25	30-Oct-31
CRC240324	Issued - Inactive	Divert Surface Water, Use Surface Water	SP Divert water	30-Oct-25	30-Oct-31
CRC253588	Issued - Inactive	Discharge fugitive dust and combustion products to air	WRS Dust Discharge (lapse date of 30 Sept 2030)	03-Jul-25	03-Jul-40

Table 2b Burnt Hill Storage Resource Consents

Burnt Hill Storage Limited Consents						
CONSENT NUMBER	STATUS	ACTIVITIES	DESCRIPTION	Original Consent Date Issued	Issue Date of this consent	Expiry Date
CRC263186	Issued - Active	Dam Surface Water	Wrights Road Storage (WRS) 8.3Mm3	28-Aug-20	13-Jan-2026	28-Aug-55
CRC263195	Issued - Active	Deposit Substance, Earthworks	WRS Excavation	28-Aug-20	13-Jan-2026	28-Aug-55
CRC263197	Issued - Active	Use Land	WRS Store Diesel	28-Aug-20	13-Jan-2026	28-Aug-55
CRC263199	Issued - Active	Discharge Contaminant into Land to Water	WRS Stormwater Discharge	28-Aug-20	13-Jan-2026	28-Aug-55
CRC263201	Issued - Active	Discharge fugitive dust and combustion products to air	WRS Dust Discharge (lapse date of 30 Sept 2030)	03-Jul-25	13-Jan-2026	03-Jul-40
Lapse date extensions for CRC263186, CRC263195, CRC263197, CRC263199 have been granted until 30 th September 2027.						

3 Audited Self-Management Programme Overview

The WIL Environmental Programme encompasses all scheme policies and procedures needed to ensure all resource consents are complied with and overall scheme objectives are met. The WIL Audited Self-Management (ASM) programme governs how the scheme will ensure its shareholders are working toward achieving future nitrogen reduction limits and how the Farm Environment Plan (FEP) audit programme works. The EMS sets out the policies and procedures to be implemented to ensure compliance with resource consents CRC252218 (previously CRC184861) and CRC166677. All other consenting requirements, internal procedures and other initiatives are approved by the WIL Board and given effect through the shareholder water supply agreements.

4 Environmental Management Strategy (EMS) Overview

The WIL EMS provides a high-level overview of how WIL manages the environmental requirements of the scheme and the relevant resource consents. The EMS encompasses several scheme documents to ensure all resource consents are complied with, operational procedures are adhered to, and catchment initiatives are encouraged. This EMS sets out the policies and procedures to be implemented to ensure compliance with resource consents CRC252218 and CRC166677 (and any replacements of). All supporting documents are required to be approved by the WIL Board of Directors and Environment Canterbury before becoming WIL policy.

Table 3 EMS Supporting Documents

Environmental Management Strategy (EMS) Supporting Documents	
Audited Self-Management Programme (February 2026)	Shareholder Non-Compliance Policy (February 2026)
Nutrient Management Policy (February 2026)	Land Use Change Procedure (August 2025)
OverseerFM Nutrient Budget Policy (February 2026)	Environmental Monitoring Programme
Community Drinking Water Supply Assessment	Sensitive Receptor Process and Assessment

4.1 Environmental Management Strategy (EMS) Purpose and Scope

The purpose of the EMS is to fulfil the requirements stipulated in the nutrient discharge (CRC252218 and any replacement of) and surface water take (CRC166677 and any replacement of) consents. The key requirements of this EMS are to ensure:

- Resource consent CRC252218 is complied with
- WIL achieves the required nitrogen reduction targets by 2030 and future consenting requirements
- Farms hold a FEP (or, when required, a Freshwater Farm Plan (FWFP)), are achieving a minimum of a ‘B’ grade FEP audit, and are working toward achieving an ‘A’ grade

A summary of how all key consent conditions are managed through the EMS are detailed below (Table 4):

Table 4 EMS Conditions of Resource Consent CRC252218

Condition	Requirement	EMS Section / Supporting Document
13.	From the Commencement Date, the consent shall comply with the Audited Self-Management Programme, including the Environmental Management Strategy that was developed in accordance with permit CRC184861 and operative immediately prior to that date. In complying with this Condition (13), the consent holder shall consult with the Canterbury Regional Council, Attention: Compliance Manager (via ecinfo@ecan.govt.nz) to determine how compliance and the transitional regime for any replacement Audited Self-Management Programme or Environmental Management Strategy as required by Condition (14) are to be implemented (and which shall form part of the conditions of this consent).	<ul style="list-style-type: none"> • Section 4 & 5
14.	Within 3 months of the Commencement Date, the consent holder shall prepare and comply thereafter with an Audited Self-Management Programme including an Environmental Management Strategy that has been prepared in accordance with Condition (15).	<ul style="list-style-type: none"> • Section 4
15a.	Identify the roles and responsibilities of the persons and entities involved in the management of the Waimakariri Irrigation Limited Environmental Programme and the implementation of this resource consent;	<ul style="list-style-type: none"> • Section 5
15b.	Set and implement environmental objectives, targets and methods to ensure: <ul style="list-style-type: none"> i. this resource consent CRC252218 is complied with; and 	<ul style="list-style-type: none"> • Entire document • Section 7

	<p>ii. each Aggregated Sub-Area Loss and the Aggregated Outside NPA Loss are assessed in accordance with the methodology required by this consent and complied with; and</p> <p>iii. the consent holder has strategies and processes in place to meet the following reduction targets that are likely to apply from 1 January 2040 (being inclusive of any reduction required by Condition 7 that apply to Schedule CRC252218A land within the Nitrate Priority Area:</p> <p>a. or Dairy Land, by 30 percent; and</p> <p>b. for Other Land, by 10 percent</p> <p>provided that for:</p> <p>c. Dairy Land, if the reductions required by Condition (15)(b)(iii)(A) for a Property (or parts of a Property) are less than 8.5 kilograms of nitrogen per hectare per year then the reductions required by Conditions (15)(b)(iii)(A) shall not apply; or</p> <p>d. Other Land, if the reductions required by Condition (15)(b)(iii)(B) for a Property (or parts of a Property) are less than 2.2 kilograms of nitrogen per hectare per year then the reductions required by Conditions (15)(b)(iii)(B) shall not apply.</p>	<ul style="list-style-type: none"> • Section 8 • Section 8 • Section 8
15c.	Require the management of nutrient losses on each Property be managed through a Farm Management Plan, Farm Environment Plan, or Certified Freshwater Farm Plan (as might apply) as required by Conditions (17) to (23), and if applicable an audit process in accordance with this resource consent;	<ul style="list-style-type: none"> • Section 8 & 9
15d.	Require, for Schedule CRC252218A Properties that are required to hold a Farm Environment Plan, that such Properties: <ul style="list-style-type: none"> i. are achieving an 'A' or 'B' audit; or ii. where only achieving a 'C' or a 'D' audit, have active measures in place to ensure an 'A' or 'B' audit is achieved at the next audit; 	<ul style="list-style-type: none"> • Section 9 & 10
15e.	Ensure the consent holder has robust audit and reporting procedures in place for Schedule CRC252218A Properties, that meet the Canterbury Certified Farm Environment Plan Auditor Manual requirements, to ensure a high level of compliance with Farm Environment Plans;	<ul style="list-style-type: none"> • Section 9, 10, & 15
15f.	Include procedures to ensure the identification of effects on sensitive receptors are appropriately avoided, remedied or mitigated, including: <ul style="list-style-type: none"> i. requiring that stock are excluded from waterbodies in accordance with Regional Council rules, any granted resource consent(s) and the Resource Management (Stock Exclusion) Regulations 2020; and 	<ul style="list-style-type: none"> • Section 9 & 10

	ii. requiring the establishment of vegetated riparian strips to minimise nutrient, sediment and microbial pathogen loss to waterbodies.	
15g.	Be consistent with the requirements in relation to CDWSZ provided for in Condition (24);	• Section 14
15h.	Be consistent with the Environmental Monitoring Plan and associated requirements provided for in Conditions (25) to (33);	• Section 11
15i.	Provide reproducible methodology, including procedures on good data management, on how each Aggregated Sub-Area Loss and the Aggregated Outside NPA Loss have been calculated and including detail on any methodology required under Conditions (4) to (12);	• Section 8 & 9
15j.	Include detail on how the management of Properties joining or leaving the scheme is to occur (including information on the loss that is to be allocated to each such Property); and	• Section 8
15k.	Include the total number of Farm Environment Plans/Certified Freshwater Farm Plans managed by the consent holder.	• Section 9
15l.	Provide a process for the review of the Environmental Management Strategy.	• Section 15 & 16
16.	When preparing the Environmental Management Strategy or seeking amendments to any of the matters listed in Condition (15), the consent holder shall submit the Environmental Management Strategy and any changes to the Canterbury Regional Council, Attention: Compliance Manager (via ecinfo@ecan.govt.nz) for certification that the Environmental Management Strategy or changes (as might apply) meet the requirements of Condition (15). The Canterbury Regional Council shall confirm the certification decision within 20 working days. The Environmental Management Strategy and any changes shall only be implemented following certification by the Canterbury Regional Council, Attention: Compliance Manager (via ecinfo@ecan.govt.nz).	• Section 17

The efficacy of the EMS and supporting documentation will be reported on in the Monthly Board Report.

5 Roles and Responsibilities (condition 15a.)

The EMS and supporting documents will be administered by WIL management. The EMS will be reviewed and updated by WIL as required. If changes to the EMS are made, the EMS shall be submitted to ECan for re-certification. The supporting documents to the EMS, will be updated as required by WIL management and approved by the WIL Board of directors before becoming operation.

Table 5 WIL Roles & Responsibilities

Role	Entity	Responsibilities
WIL Board of Directors	WIL	Oversee all Strategy and Policy changes
Chief Executive	WIL	Oversight and delivery of the EMS and supporting documentation
Environmental Team	WIL	Develop and implement the EMS to comply with resource consent requirements, work with farmers to ensure EMS practices are implemented on farm, management of environmental staff and external contractors.
Aggregated nitrogen loss (referred to in this document as the WIL Baseload ³) Calculation	WIL or external contractor(s)	Update Overseer nutrient budgets as required and recalculate the nitrogen load.
Farm Environment Plan (FEP) or Freshwater Farm Plan (FWFP) Auditor	External Contractor(s)	Undertake audits and report to the Environmental Team.
EMS Reviews	External Contractor(s)	Peer review of the EMS

6 Objectives and Targets (consent condition 15b.)

Condition 15(b) of CRC252218 requires WIL to set objectives and targets to ensure:

- Resource consent CRC252218 is complied with,
- All farms work toward achieving their 2030 nitrogen limits and future consenting requirements,
- Properties required to hold a FEP or FWFP maintain compliant grades and work toward achieving 'A' grades

6.1 Objectives & Targets

To achieve the outcomes of CRC252218, WIL will ensure the following environmental objectives are achieved through the implementation of this EMS:

- Improve water quality trends within the WIL monitored ground and surface water sites by making nitrogen loss reductions on farm and implementing biodiversity enhancements along waterways.
- WIL shareholders are actively managed to achieve continuous improvements and 'A' grade audits.

³ WIL baseload being the Aggregated Sub-Area Loss and Aggregated Outside NPA Loss as defined in CRC252218

- Shareholders are supported to ensure farming activities are actively managed to avoid, remedy, or mitigate adverse impacts on sensitive environments and receptors (community drinking water supplies).

6.2 Targets

Table 6 WIL EMS Targets

Objective	Target	Reporting KPI
Improve water quality trends within the WIL area by making nitrogen loss reductions on farm and implementing biodiversity enhancements along waterways.	<ul style="list-style-type: none"> • Improve understanding of ground and surface water systems in the catchment. • Farms work toward achieving their 2030 nitrogen limits and future consenting requirements. 	<ul style="list-style-type: none"> • Annual compliance reports. • Annual Overseer summary in November.
WIL shareholders are actively managed to achieve continuous improvements and 'A' grade audits.	<ul style="list-style-type: none"> • Farms achieve 'A' grade FEP audits. • Farms understand their environmental footprint and work to improve outcomes. 	<ul style="list-style-type: none"> • Monthly board reports and annual report. • Annual benchmarking farm reports.
Shareholders are supported to ensure farming activities are actively managed to avoid, remedy, or mitigate adverse impacts on sensitive environments and receptors.	<ul style="list-style-type: none"> • Shareholders are aware of sensitive receptors on their property and the actions required to avoid, remedy, or mitigate impacts from their farming activities. 	<ul style="list-style-type: none"> • Monthly board report & annual reports.

7 Aggregated Nitrate Priority Area Loss (Nitrogen Baseload) Nutrient Accounting Methodology (condition 15i.)

The WIL baseload has been calculated in accordance with conditions 5 - 8 of CRC252218.

7.1 Baseload Description

WIL first gained a nutrient discharge consent in 2016. The consent at that time used lookup tables to calculate the nitrogen baseline load, during re-consenting in 2024/2025, those lookup tables were out of date and needed updating. Within Chapter 8 of the Land and Water Regional Plan (colloquially referred to as Plan Change 7), policy 8.4.29 allows for the irrigation scheme to set a baseload for properties up to 20 July 2019 to allow for any lawful intensification. As such the baseload has been defined as the Overseer Year Ending 2019 (YE 2019) at GMP (if the model is pastoral)/Environment Canterbury Equivalent Pathway Tool (ECEP) (if any crop is present). The scheme holds accurate information for all Schedule 'A' properties for the 2019 period. The WIL Nutrient Management Policy covers this in more detail.

7.2 WIL Farm Categories

Shareholder properties have been identified as belonging to one of three categories:

- 1.) WIL Schedule 'A' Properties, these properties make up the WIL scheme nitrate priority area nitrogen baseloads
- 2.) WIL LWRP Chapter 8 PA Equivalent Farm (Schedule 'B')
- 3.) WIL Farming Land Use (FLU) consented properties (Schedule 'C')

7.2.1 WIL Schedule 'A' Properties

These properties and any blocks associated with the shareholder/property have an irrigation area larger than 50 hectares and/or have greater than 5 hectares of winter grazing and do not hold a FLU consent with ECan. These properties account for the WIL nitrogen Baseload that has been calculated for each nitrate priority area (NPA). WIL will maintain an active register on GIS of all Schedule 'A' farms. These farms are all audited as per condition 18 of CRC252218.

7.2.2 WIL PA Equivalent Farms (Schedule 'B')

A WIL PA Equivalent Farm is a property that receives WIL water, has 50 hectares or less of irrigation (including any other associated blocks), has no more than 10 hectares above what was irrigated at 20 July 2019, and has 5 hectares or less of winter grazing (appendix 2). These properties are required to submit farm system information to WIL annually as per Appendix 2 of the Nutrient Management Policy and are allocated a nominal nitrogen load of "-". WIL will maintain an active register on GIS of all Schedule 'B' farms. These farms hold Farm Management Plan (FMP) and will be visited by the WIL Environmental Team a minimum of once every four years.

7.2.3 WIL Supplied Farming Land Use Consented Properties (Schedule 'C')

These properties hold an active Farming Land Use (FLU) consent with ECan and are responsible for demonstrating compliance with their consent to ECan and WIL. WIL will maintain an active register on GIS of all Schedule 'C' farms. These farms do not make up the WIL aggregated nitrogen loss.

7.3 WIL Board Approved Land Use Change

If WIL shareholders wish to change aspects of their farm system, they may trigger the need to get WIL approval and WIL Board of Director signoff if thresholds are exceeded. Thresholds include:

- Increases/Reductions in WIL shares allocated to a block
- Any change in land area
- Change in irrigated area >10 hectares from 10 December 2025 (granting of CRC252218)
- Change in irrigation application rate/volume affecting an area >10 hectares from 10 December 2025 (granting of CRC252218)
- Application for effluent discharge consent (dairy)
- Long-term stock number changes from 2019 of >10% (provided numbers are within farm specific consent limits)
- Increase in cropping area >10% from 10 December 2025 (granting of CRC252218)
- Changes to stockholding infrastructure or milking schedule (eg. winter milking)

WIL will only provide sign-off if a shareholder can clearly demonstrate the farm system is not going to increase the risk for WIL to comply with CRC252218. One aspect reviewed by WIL is scenario Overseer modelling, this scenario modelling must show compliance with the farms 2030 nitrogen limit as soon as the farm system change is operational. The approved Overseer scenario model will then over-ride the 2019 baseload for the farm.

7.4 Aggregated Nitrogen Loss (Baseload) Calculation Methodology

The WIL aggregated nitrogen loss is calculated for Schedule 'A' properties and is based on GMP (if pastoral) or ECEP (if crop is present) losses for the YE 2019 or a WIL Board approved land use change (LUC) scenario Overseer model). The aggregated loss is then calculated for each NPA sub-area as well as the area "outside" any NPA zone.

Methodology

- (1) All properties receiving WIL water are assessed to identify their status as per Appendix 5 (WIL Nutrient Discharge Consent Compliance Regime). If a shareholder is identified as belonging to Schedule 'A', Overseer modelling for YE 2019 for all blocks is required. Overseer modelling is required to follow the WIL nutrient budget consistency protocol. The Overseer model is then run through wither the GMP or ECEP portal. If the property has been through a LUC proposal approved by the WIL Board, this then forms their nitrogen load limit.
- (2) For properties that can operate within the permitted activity thresholds as defined in the LWRP (appendix 2) a '- ' is allocated to the nitrogen load to reflect the status.
- (3) Overseer models are analysed to determine if there is any crop present on farm in 2019 or the WIL approved scenario, if there is, the Overseer model is then run through the ECEP tool to assess the GMP loss rate. If there is no crop on the property, the Overseer model is run through the Farm Portal.
- (4) The total area of each block within each NPA sub-area and the area not within the NPA is then calculated.
- (5) The nitrogen loss per hectare as identified through the Farm Portal or ECEP tool which is then multiplied by the total area in each NPA sub-area to calculate total nitrogen loss for each zone.

Example:

- 200 hectare dairy farm (150 hectare platform with 50 hectares of dairy support land).
 - 150 hectares in NPA 'A' (dairy) and 50 hectares in NPA 'B' (dairy support)
 - Average nitrogen loss per hectare is 60kg (12,000 kg N total)
 - NPA 'A' nitrogen baseload: 60 kg N x 150 hectares = 9,000 kg N
 - NPA 'B' nitrogen baseload: 60 kg N x 50 hectares = 3,000 kg N

7.5 Farms Leaving or Joining the Scheme

WIL manages when farms join or leave the scheme and the associated nitrogen allocation.

7.5.1 Joining the Scheme

Properties wanting to join the scheme are required to submit to WIL a number of documents;

- Overseer YE 2019 modelling → WIL then converts this to the corresponding GMP or ECEP loss.
- Current farm system Overseer modelling.
- Proposed farm system Overseer modelling, including detail on how the farm will demonstrate compliance with the 2030 nitrogen limit and how it will achieve future consenting requirements.
- Previous compliance history.
- Biodiversity enhancement plan.

WIL management will make an assessment on the above criteria and provide a recommendation to the WIL Board of Directors for approval. The farm will then join either WIL schedule 'A' or 'B' and ECan will be notified as per CRC252218.

7.5.2 Leaving the Scheme

Where land leaves the scheme, the calculated nitrogen loss on Schedule CRC252218 'A' or 'B' shall be removed from the scheme load. Where a shareholder sells part of a property, which is then no longer part of the scheme, the nitrogen loss calculations shall be updated in Schedule CRC252218 'A' or 'B' to reflect the area remaining in the scheme, or on such other basis to ensure that there is no overall increase in nitrogen loss.

When any property or land leaves the WIL ASM programme, the WIL Environmental Team will notify ECan within 20 working days as per CRC252218.

8 Nitrogen Reduction Limits (condition 15b.)

Nitrogen reductions are calculated as per conditions 7 and 8 of CRC252218.

All five NPA sub areas fall within within the WIL scheme nutrient discharge command area as well as area not covered by any NPA. NPAs all specify a 20% nitrogen reduction for dairy by 1 January 2030 and 5% nitrogen reduction for all other land use types by 1 January 2030. If a property has more than one land use, the pro-rated nitrogen reduction is calculated. As per conditions 7 of CRC252218, WIL shareholders only have to make reductions on farmed land (not ineffective/unproductive areas). Nitrogen reductions for WIL shareholders that have farmed land that falls outside any NPA will be voluntary. WIL will report to Environment Canterbury at a scheme level as well as the NPA level, however, reporting to the WIL Board of Directors will be more granular with each property being monitored against their reduction limits. Nitrogen reduction requirements are based on the current land use and not the land use during the baseload period. The WIL Nutrient Management Policy covers this in more detail.

Example:

- 200 hectare dairy farm (150 hectare platform with 50 hectares of dairy support land).
 - 150 hectares in NPA 'A' (dairy) and 50 hectares in NPA 'B' (dairy support)
 - Average nitrogen loss per hectare is 60kg (12,000 kg N total)
 - NPA 'A' (dairy) nitrogen baseload: 60 kg N x 150 hectares = 9,000 kg N
- NPA 'B' (dairy support) nitrogen baseload: 60 kg N x 50 hectares = 3,000 kg N
 - Total Base N Load = 12,000 kg N
 - NPA 'A' (dairy) 2030 limit: 9,000 kg - 20% reduction = 7,200 kg N
 - NPA 'B' (dairy support) 2030 limit: 3,000 kg - 5% reduction = 2,850 kg N
 - **Total 2030 N Load = 10,050 kg N (16.25% weighted average reduction)**

9 Continuous Improvement (condition 15d.)

To achieve the schemes environmental objectives, continuous improvement is strived for by the cooperative. WIL is committed to enhancing the Waimakariri region biodiversity values and improving water quality outcomes. Continuous improvement will be administered through the FEP / FWFP

programme and will be our way to ensure our shareholders are aligned in achieving the combined vision. The core principles of continuous improvement are Plan – Do – Check – Act.

Plan: WIL will work with shareholders to develop FEP / FWFP plans that support their environmental aspirations and align the plans to the co-operative vision. Plans will identify areas of efficiency gains and improvements as actions.

Do: Implementation of the FEP / FWFP plans will be monitored by WIL with annual check ins with all shareholders the aim. When required, WIL will work with the shareholders to guide them toward achieving the actions.

Check: Checks on how the plans are being implemented and complied with will be completed by external auditors and reported back to WIL.

Act: Where areas for improvement are identified WIL will ensure issues are remedied or mitigated, during this process the FEP / FWFP will be updated ensuring it remains a 'living document'.

10 Farm Environment Plans and Implementation of Industry Agreed Good Management Practice (condition 15c.)

Farm Environment Plans (FEPs) are the principal tool for the delivery of the good management practice (GMP) outcomes, combined with an auditing process that encourages implementation of GMP measures. FEP's / FWFP's will be implemented as per the WIL ASM Programme. All Schedule 'A' properties must have a FEP / FWFP and are required to demonstrate how they achieve GMP and beyond while maintaining an 'A' or 'B' grade audit. WIL PA equivalent farms not requiring a FEP will be required to hold an up-to-date Farm Management Plan (FMP) as per schedule CRC252218E, this will be reviewed by WIL management, and each FMP will include actions on how to achieve GMP. Properties holding a FMP will be visited a minimum of once every four years.

The WIL Environmental Manager or representative will work with all shareholders to support them in achieving GMP and practices that are considered beyond GMP. FEP audit grades will be the tool to monitor the progress of shareholders against GMP and beyond.

11 Water Quality Monitoring (condition 15h.)

Comprehensive water quality and ecological monitoring will be completed throughout the year by WIL. The monitoring program will be reviewed annually by WIL or representative, and any identified recommendations will be implemented following approval from the Regional Leader - Monitoring and Compliance, ECan.

11.1 Groundwater Monitoring

WIL has an established groundwater monitoring programme including water level and water quality monitoring.

11.1.2 Groundwater Level Monitoring

Groundwater level changes will likely be caused by scheme activities such as irrigation usage and groundwater recharge trials. When groundwater recharge trials are occurring, WIL will monitor the take from the Waimakariri River at the Browns Rock intake and the flow used for recharge trials.

Monthly groundwater level monitoring will continue using the same bores that have been used since the implementation of monitoring to ensure trends are built. These bores all have historical groundwater level monitoring data available allowing for changes to be monitored. Changes to bores monitored for water level may need to be made for several reasons and WIL will endeavour to ensure that any replacement bore selected has the same characteristics as original bores. Water level monitoring data will be included in the annual WIL report presented to ECan.

Table 7 Water Level Monitoring Bores

Bore	Sampling Frequency	Depth (m)
L35/0051	Monthly	75.9
M34/0306	Monthly	10.3
M35/0008	Monthly	14.6
M35/0017	Monthly	12.9
M35/0026	Monthly	16.8
M35/0058	Monthly	11.0
M35/0143	Monthly	29.0
M35/0174	Monthly	45.7
M35/0222	Monthly	13.7
M35/0312	Monthly	9.1
M35/0637	Monthly	10.7
M35/4757	Monthly	21.7

11.1.3 Groundwater Quality Monitoring

The main groundwater quality parameters of concern related to irrigation development arise from increased concentrations of nitrate-nitrogen and E. coli concentrations. In addition, there is a contrast in chloride concentrations between existing groundwater quality and Waimakariri River water. Chloride is particularly mobile in the subsurface environment and therefore may prove to be a useful indicator of any effect arising from the application of irrigation water from the scheme.

Where feasible, the bores that are monitored are those which tie in with ECan’s existing monitoring programme for this area. At present, one of the regularly sampled bores (M35/0132) is sampled by ECan. In order to determine water quality impacts monthly sampling is carried out on three bores (including M35/0132) and quarterly sampling on 11 bores. Figure 2 identifies the location of each of these bores in the catchment.

The groundwater quality sampling is undertaken for nitrate-nitrogen, E. coli, chloride, ammoniacal N, pH and electrical conductivity.

Table 8 Groundwater Quality Monitoring Bores

Bore	Sampling Frequency	Depth (m)	Sampled By
L35/0349	Monthly	20.0	WIL
M35/0132	Monthly	20.4	ECan/WIL
M35/10179	Monthly	23.5	WIL
M34/0731	Quarterly	21.5	WIL
M35/0008	Quarterly	14.6	WIL
M35/2711	Quarterly	21.7	WIL
M35/4757	Quarterly	21.7	WIL
M35/4795	Quarterly	13.8	WIL

M35/5440	Quarterly	20.9	WIL
M35/5869	Quarterly	20.5	WIL
M35/6385	Quarterly	40.2	WIL
M35/6639	Quarterly	15.5	WIL
M34/5661	Quarterly	21.68	WIL
M35/5174	Quarterly	13.7	WIL

11.2 Surface Water Monitoring

WIL is committed to monitoring surface water quality and ecology throughout the catchment. An improved monitoring program has been developed and has identified key surface water areas within the scheme to monitor (Figure 3). Water quality monitoring will be carried out for dissolved inorganic nitrogen, dissolved reactive phosphorus, nitrate-nitrogen, ammoniacal nitrogen, E.coli, periphyton cover, periphyton biomass, and macroinvertebrates.

An annual report will be completed with a summary provided in the WIL annual report submitted to ECan by 1 December. The summary report will set out the results of all sampling undertaken over the previous 12-month period, including a discussion on the nature of any changes over time.

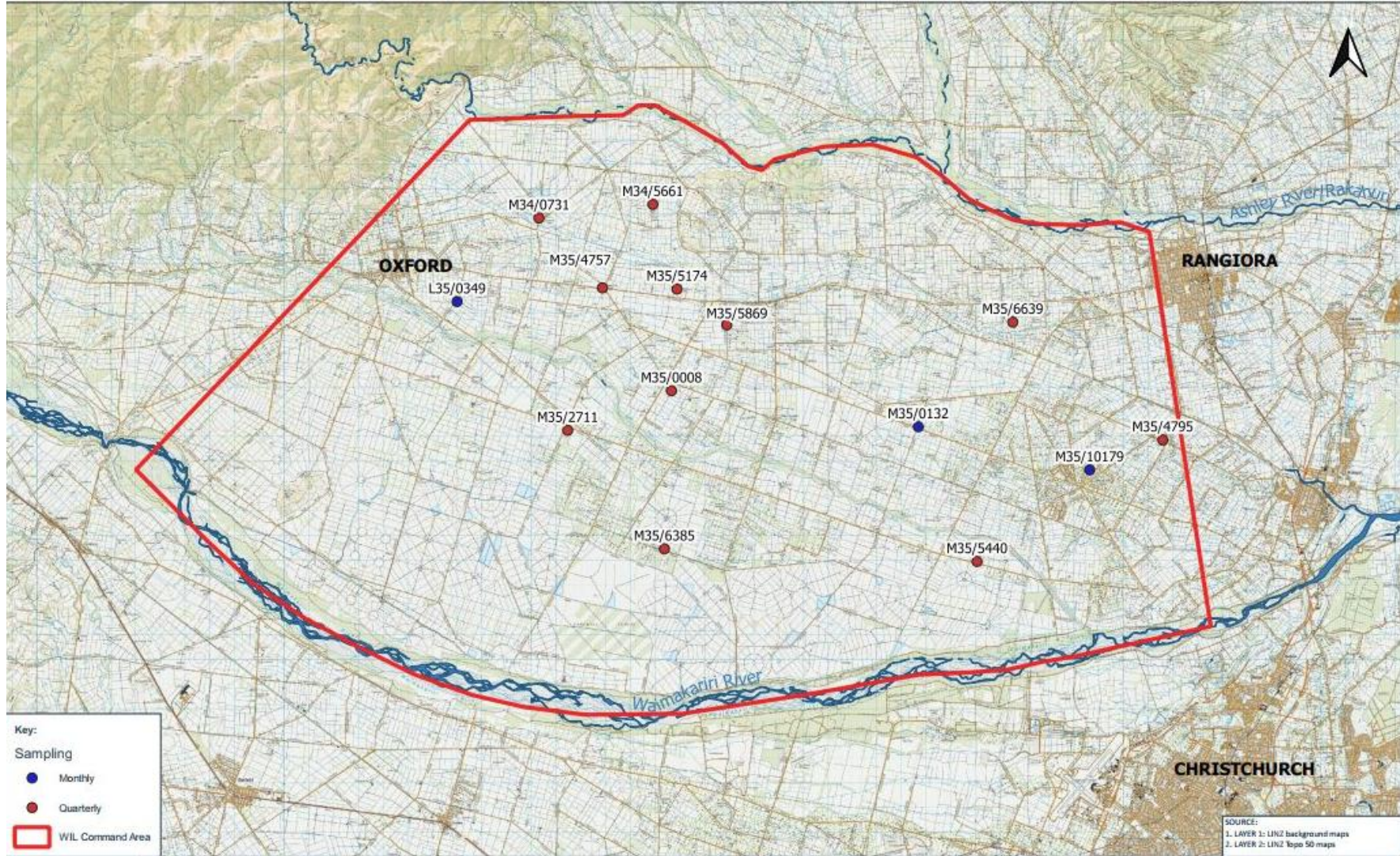


Figure 2 WIL Groundwater Quality Monitoring Sites

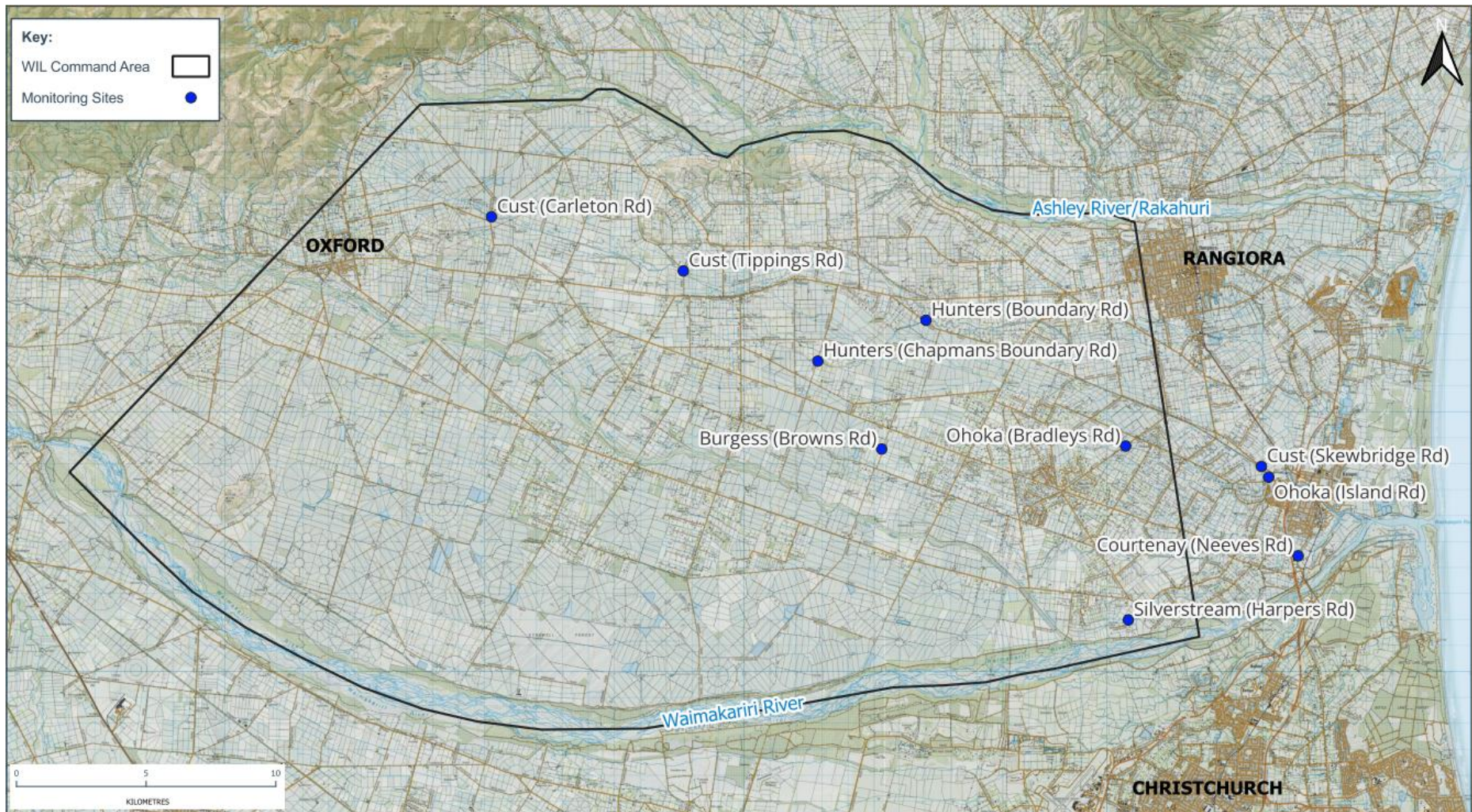


Figure 3 WIL Surface Water Quality and Ecology Monitoring Sites

12 Water Usage Monitoring and Efficient Use (condition 15h.)

WIL has undergone a large water meter installation programme, with a total of 205 flow meters installed across the scheme, monitoring a total of 98% of WIL water that is used for irrigation (excludes stockwater from the calculation). The 2% of unmonitored water is from small users such as lifestyle properties. These flow meters are linked to the Waterforce SCADA system which replaced the previous Regen system that was initially used within the scheme. The SCADA system utilises on farm soil moisture monitoring equipment and weather stations throughout the schemes command area to forecast upcoming weather events, soil moisture levels, and possible drainage events. At a farm level, alerts are set up for key personnel on farm to ensure drainage events are minimised. Waterforce administer this equipment and provide monthly updates to WIL management which provide clarity and ensure the integrated system is working well. The SCADA system is constantly being updated, with new initiatives continually being developed that ensure WIL shareholders are operating efficiently and have all the data at their fingertips to make good irrigation scheduling decisions.

In addition to this, WIL have been developing dashboards that allow for the take from the Waimakariri River to be analysed against irrigation demand, irrigation delivered, irrigation used on farm, and stockwater delivered. These dashboards are used by WIL daily to identify scheme losses and make efficiency gains.

The SCADA farm data is assessed and analysed by the independent FEP auditors to give confidence to the irrigation targets in the audit.

13 Sensitive Receptors (condition 15f.)

Some farming activities on WIL shareholder properties can impact sensitive receptors and additional actions may be needed to avoid, remedy, or mitigate these effects.

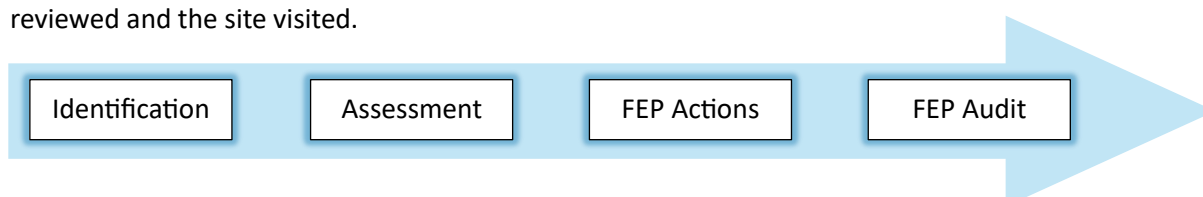
Sensitive receptors are defined in resource consent CRC252218 as:

Areas of wetland, surface water bodies and riparian areas, sites of cultural significance and, in the case of any land located within a Community Drinking Water Protection Zone, the Community Drinking Water Supply.

This section of the EMS details the steps WIL will undertake to identify sensitive receptors within or adjoining shareholder properties and ensure effects from new and existing farming activities are avoided, remedied, or mitigated. Note community drinking water supplies are dealt with separately in section 15.

13.1 Approach

WIL has identified at a desktop level all sensitive receptors within the scheme area and which farms these are located on. As part of the FEP update process and shareholder check-ups, each of these sites are assessed and a risk assessment completed. Actions are then added to the shareholder FEP to ensure protection and enhancement of these sites. During the FEP audit process these actions are reviewed and the site visited.



14 Community Drinking Water Protection Zones (CDWPZ's) (condition 15g.)

Community Drinking Water Protection Zones (CDWPZ's) are areas of land surrounding a human drinking water supply that may potentially have an influence on the quality of the water supply. These areas are deemed sensitive receptors within the scheme and have specific requirements. CDWPZ's have been identified on the ECan planning maps (Appendix 4). All details of the CDWPZ's are recorded in the farms FEP (as per schedule CRC252218D). Additional requirements for land within a CDWPZ include:

- Complete a CDWPZ risk assessment which will be included in the FEP. The risk assessment will include what farming activities occur within the zone, likelihood of pathogen transfer, current CDWPZ well head protection, and mitigation measures implemented within the zone.
- No intensification within the area from the baseload including stocking rate, fertiliser use, and winter crop.
- Shareholders with land inside the CDWPZ will have a condition in their FEP to notify WIL management if there is an event that occurs that may lead to an adverse effect on the water quality of the associated bore.

14.1 CDWPZ Risk Assessment

The risk assessment completed as part of the FEP will assign a low, medium, and high-risk category to each area within the protection zone.

- Low Risk:** there shall be no further management actions required in relation to the farming activities able to occur on the CDWPZ Impacted Land (subject to compliance with this resource consent and PA rules related to the CDWPZ);
- Medium Risk:** the farming activities able to occur on the CDWPZ Impacted Land shall be managed to (in addition to compliance with this resource consent and permitted activity rules related to Community Drinking Water Protection Zones):
 - avoid the discharge of solid or liquid effluent (including animal based manures) within 20 metres of the Community Drinking Water Protection Zone;
 - ensure all irrigation on the CDWPZ Impacted Land in the Community Drinking Water Protection Zone is undertaken using good management practice to minimise drainage to groundwater; and
 - implement any other site-specific recommendations that are consistent with managing Medium Risk activities and that are identified in the Community Drinking Water Protection Zone Risk Assessment.
- High Risk:** the farming activities able to occur on the CDWPZ Impacted Land shall be managed to (in addition to compliance with this resource consent and PA rules):
 - avoid the discharge of solid or liquid effluent (including animal-based manures) within 20 metres of the CDWPZ;
 - avoid any winter grazing (as defined in the Canterbury Land and Water Regional Plan at the Commencement Date) within the CDWPZ Impacted Land;
 - ensure all irrigation on the CDWPZ Impacted Land in the Community Drinking Water Protection Zone is undertaken using good management practice to minimise drainage to groundwater;
 - ensure there is no increase in stocking rate or fertiliser application on the CDWPZ Impacted Land in the Community Drinking Water Protection Zone; and

- e. implement any other specific recommendations that are consistent with managing Medium and/or High Risk activities and that are identified in the Community Drinking Water Protection Zone Risk Assessment.

15 Reporting

15.1 Board Reporting

The WIL Board of Directors meets the first Thursday of every month. Currently as part of this monthly meeting an environmental report is completed that includes;

- FEP audit progress and results
- Action taken for properties not receiving compliant audit grades
- WIL consenting updates
- Summary reports for any farm change applications
- Summary of environmental projects completed

15.2 Annual Compliance Report

WIL will continue to complete an annual report in accordance with consent CRC252218, the report will be presented to the WIL Board of directors, ECan and any other specified interested parties. Annually in November, the WIL Board of Directors will be provided a report of how each farm is tracking against baseload nitrogen loads, 2030 nitrogen limits, and future consenting requirements.

16 Document Management Control & Review

16.1 Changes that Constitute Re-Certification of the EMS

Any change made to the EMS that is likely to impact resource consent compliance will be identified with a version stamp beside the change (e.g. **v1**). Any such changes will be signed off at WIL Board level and presented to ECan for certification.

16.2 Internal Review of the EMS

The EMS and any supporting documentation may be reviewed in response to the following:

- Changes to resource consent conditions
- Implementation of National Environmental Standards for Freshwater (2020) and National Policy Statement for Freshwater (2020)
- Deteriorating trends in water quality within the Waimakariri Region
- If nitrogen load reductions are not on track to being achieved
- In response to internal or external reviews of policies and procedures

16.3 External Review of the EMS

In accordance with CRC252218, the EMS and nitrogen baseload will be reviewed as required by a suitably qualified and independent expert. Review details are to be recorded in Table 5.

The aim of the EMS review is to identify and discuss improvements in the documentation and implementation of the EMS to ensure the following:

- Resource consent CRC252218 is complied with.
- Nitrogen reduction targets are achieved.

- Properties with a FEP / FWFP are achieving or working towards an “A” audit grade.
- OverseerFM modelling is in accordance with modelling protocols.

Except for the years where a full review is required, only 1/3rd of the EMS shall be reviewed, to be rotated annually to ensure the whole EMS is reviewed over a period of 3 years.

16.4 Overseer Review

Annually, WIL will review all Overseer models to ensure farms are operating within the limits prescribed by WIL and progress is being made to achieve the 2030 nitrogen loss limits and future consenting requirements. In addition to the internal Overseer review, a random sample of Overseer models will be reviewed at the time this EMS is externally reviewed to ensure robust Overseer modelling is being completed. If Overseer models are found to not be robust, consultants will be informed and changes will be required, if repeated offences occur, WIL can request the modelling be completed by a different consultant.

Table 9 EMS & Nitrogen Baseload Reviews

Date	EMS Review	Who	Overseer Review
16 July 2024	EMS Drafted v1	Ben Howden	Annual review
08 Oct 2024	EMS Draft v2	Ben Howden	
19 Feb 2026	EMS Draft v3 & Overseer version change	Ben Howden	

16.5 Consultation

Any time there are changes to the EMS that are likely to impact resource consent compliance, WIL will consult with all interested parties to discuss the proposed changes before any change is approved by the WIL Board of Directors.

16.6 Certification of EMS

The WIL nutrient discharge consent requires the EMS, and any material amendments related to consent conditions to be certified by ECan prior to implementation.

Where there is a material change to a single EMS supporting document, only the amended supporting document will need to be re-certified.

Prior to the application of any certification or re-certification of the EMS by ECan, the EMS or amendments, shall first be approved by the WIL Board of Directors and provided to other interested parties for consultation.

16.7 Distribution List

As required by nutrient discharge consent CRC252218 the EMS will be distributed internally and to all interested parties.

Table 10 EMS Distribution List

Organisation	Personnel	Documents	Date
WIL	CEO, Board of Directors, Shareholders, WIL Website	EMS EMS Reviews Annual Reports	
PDP	Technical Director Leader – Water Resources	EMS Annual Report	
Anderson Lloyd	Partner	EMS	
ECan	Regional Leader – Monitoring and Compliance	EMS EMS Reviews Annual Report	

17 Amendment Register

Table 11 Amendment Register

Version	Amendment Date	Amendment Made	Section Reviewed	Reviewer	Status
1	15 June 2024	Development of EMS	All	Ben Howden	Draft
2	08 Oct 2024	Development of EMS	All	Ben Howden	Draft
3	18 Nov 2024	General changes made as requested from the WIL Board of Directors	All	Ben Howden	Draft
4	19 Feb 2026	Updates to reflect the granting of CRC252218	All	Ben Howden	Draft
5	20 Mar 2026	Updates post WIL Board feedback	All	Ben Howden	Draft for ECan Certification

18 Appendices

Appendix 1 EMS Supporting Documents

Environmental Management Strategy (EMS) Supporting Documents	
Audited Self-Management Programme (February 2026)	Shareholder Non-Compliance Policy (February 2026)
Nutrient Management Policy (February 2026)	Land Use Change Procedure (August 2025)
OverseerFM Nutrient Budget Policy (February 2026)	Environmental Monitoring Programme
Community Drinking Water Supply Assessment	Sensitive Receptor Process and Assessment

Appendix 2 Definitions

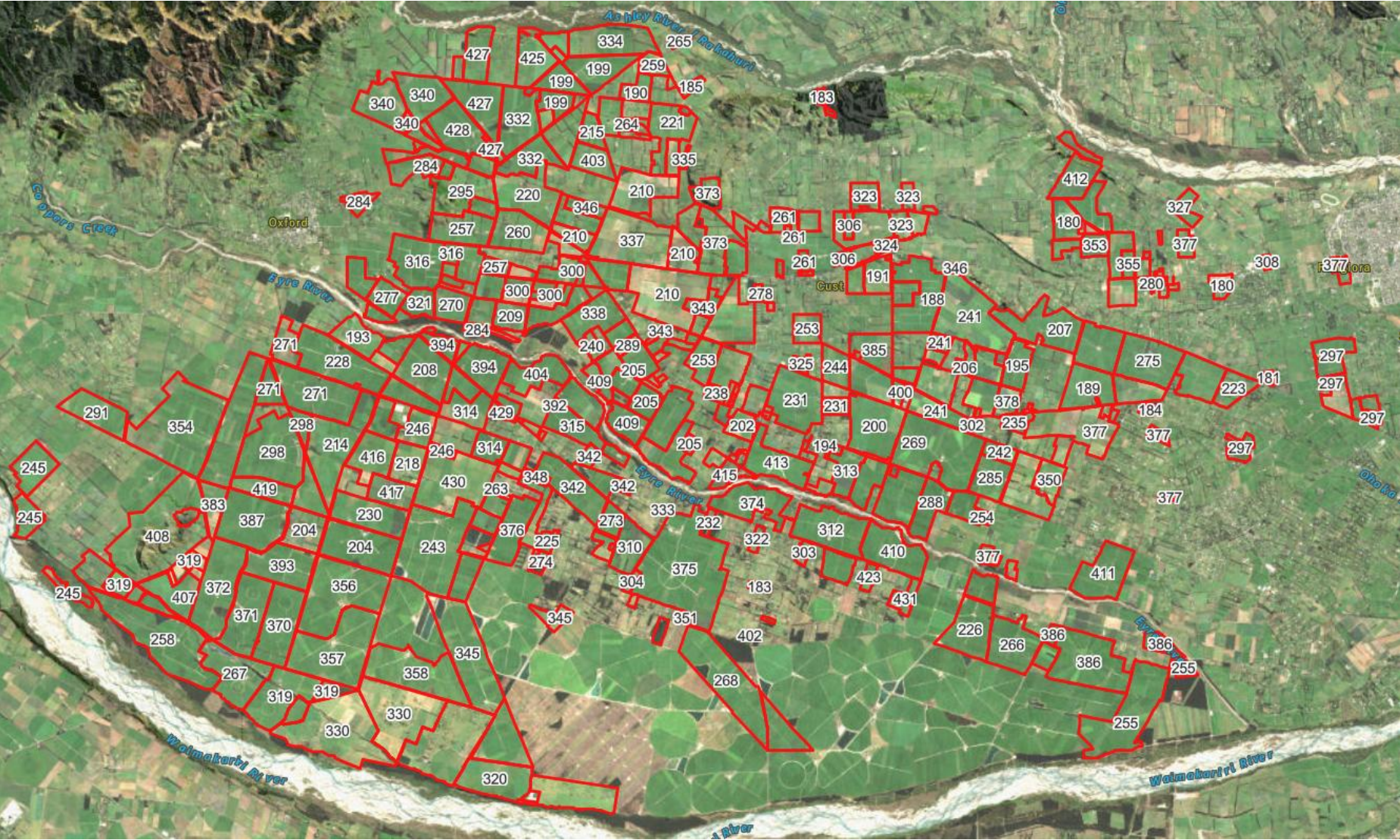
Aggregated Outside NPA Load	means the aggregated total loss of all Individual Property Losses for all Properties (or parts of Properties) that are located outside of the Nitrate Priority Area and as further defined in Condition (4)(a)(v)(B).
Aggregated Sub-Area Load	means the aggregated total loss of all Individual Property Losses for all Properties (or parts of Properties) that are located within a Sub-Area and as further defined in Condition (4)(a)(v)(A).
Alternative Methodology	means the alternative methodology that may be implemented by the consent holder for the purposes of assessing the WIL GMP Loss and as detailed in Condition (6).
Canterbury Certified Farm Environment Plan Auditor Manual	means the Canterbury Certified Farm Environment Plan Auditor Manual (dated November 2022), prepared to provide guidance and procedures for undertaking Farm Environment Plan Audits
CDWPZ	means a Community Drinking Water Protection Zone as identified in Schedule 1 of the Canterbury Land and Water Regional Plan.
CDWPZ Impacted Land	<p>Land that is included in a CDWPZ, plus any other land within the same paddock where it not possible to treat such further land on a different management basis for the purposes of Condition (24).</p> <p>Advice Note: <i>For example:</i></p> <ul style="list-style-type: none"> • <i>it will typically not be possible to provide differential stock grazing within the same paddock; and</i> • <i>it may be possible to provide differential management for a cropping or horticultural operation in the same paddock.</i>
Certified Freshwater Farm Plan	means a freshwater farm plan certified under section 217G of the Resource Management Act 1991 (as amended from time to time in accordance with section 217E(2) or (3)), or as provided for by the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 or any future national policy statement.
Commencement Date	means the date that this consent commenced for the purposes of section 116 of the Resource Management Act 1991.
Dairy Land	<p>means land used for the grazing of dairy cattle for producing milk, but excluding Dairy Support Land.</p> <p>Advice Note: <i>Dairy Land is intended to capture Farming Type "Dairy" in Table 8j of the Canterbury Land and Water Regional Plan.</i></p>

Dairy Support Land	<p>means land used for grazing dairy support cattle, being cattle that are:</p> <ul style="list-style-type: none"> • farmed for producing milk but are not being milked (for example, because they are heifers or have been dried off); and • are being grazed on land that is not Dairy Land <p>Advice Note: Dairy Support Land forms part of "Other Land" for the purposes of this consent.</p>
Farming Enterprise	<p>means an aggregation of parcels of land held in single or multiple ownership (whether or not held in common ownership) that constitute a single operating unit for the purpose of nutrient management.</p>
Farm Environment Plan	<p>means a Farm Environment Plan for properties listed in Schedule CRC252218A, in the form set out in Schedule CRC252218D:</p> <ul style="list-style-type: none"> • as may be amended following mutual agreement with the Canterbury Regional Council, Attention: Compliance Manager (via ecinfo@ecan.govt.nz); or • should the use of a Certified Freshwater Farm Plan be required or available on the basis it is certified and available for use then the consent holder may, as may be mutually agreed with the Canterbury Regional Council, Attention: Compliance Manager (via ecinfo@ecan.govt.nz) elect to use such a plan (and which will then take the place of Schedule CRC252218D).
Farm Management Plan	<p>means a Farm Management Plan for properties listed in Schedule CRC252218B in the form set out in Schedule CRC252218E:</p> <ul style="list-style-type: none"> • as may be amended following mutual agreement with the Canterbury Regional Council, Attention: Compliance Manager (via ecinfo@ecan.govt.nz); or • should the use of a Certified Freshwater Farm Plan be required or available on the basis it is certified and available for use then the consent holder may, as may be mutually agreed with the Canterbury Regional Council, Attention: Compliance Manager (via ecinfo@ecan.govt.nz) elect to use such a plan (and which will then take the place of Schedule CRC252218E).
Good Management Practice	<p>means the practices described in the document entitled "Industry-agreed Good Management Practices relating to water quality" - dated 18 September 2015.</p>

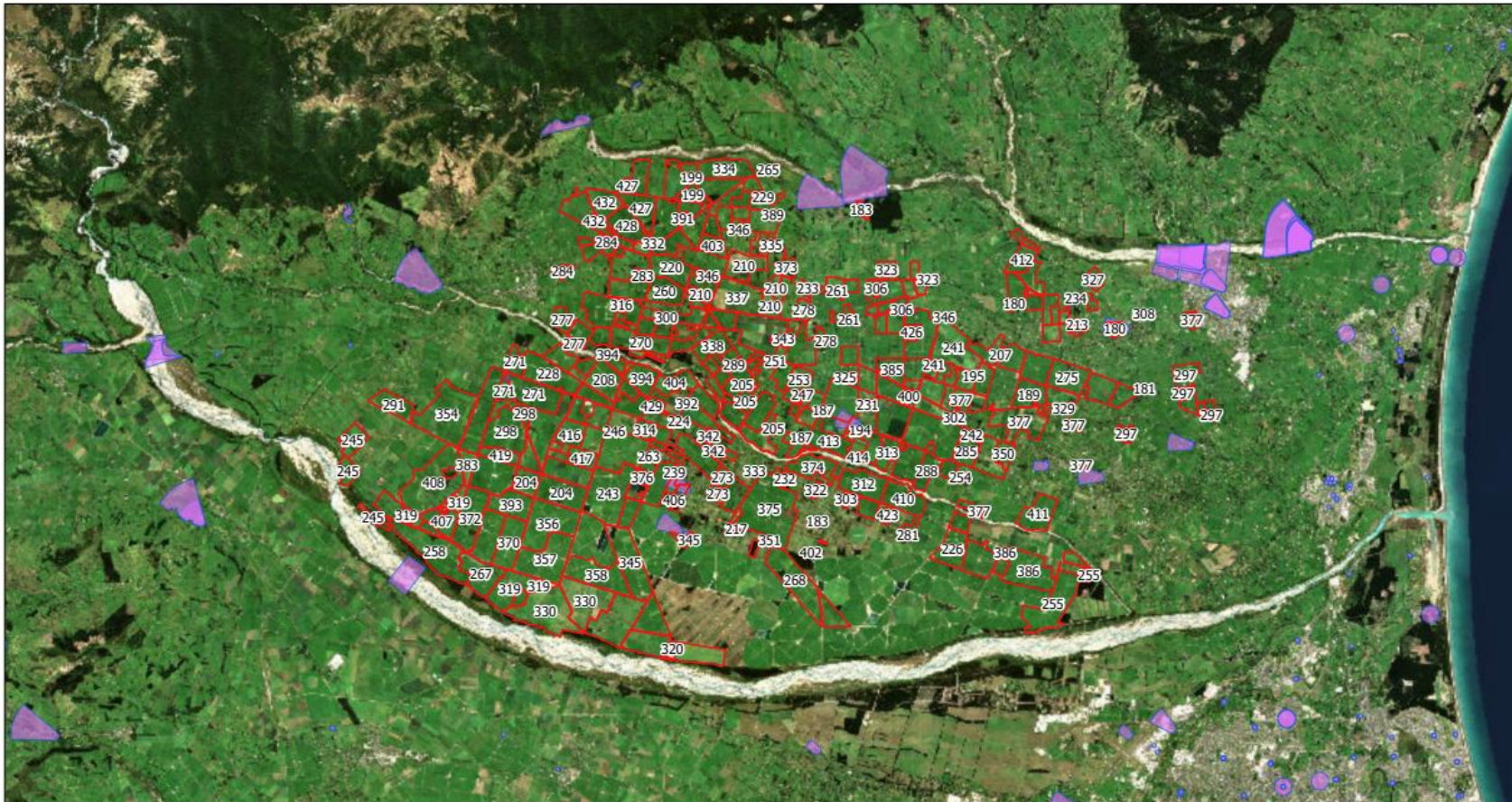
Individual Property Loss	means the nitrogen loss calculated for each individual Property in accordance with Conditions (5) to (8)
Nitrate Priority Area	means the Nitrate Priority Area as shown on Plan CRC252218A
Other Land	means land that is not Dairy Land that is used for any agricultural and horticultural purpose and including Dairy Support Land but does not include non-farmed/ineffective areas. Advice Note: <i>Other Land is intended to capture Farming Type "All other" in Table 8j of the Canterbury Land and Water Regional Plan.</i>
Permitted Activity Criteria	means any property where: <ul style="list-style-type: none"> • the total area irrigated is 50 hectares or less and no more than 10 hectares above what was irrigated at 20 July 2019; and • the total area used for Winter Grazing is 5 hectares or less.
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.
Sensitive receptor	Areas of wetland, surface water bodies and riparian areas, sites of cultural significance and, in the case of any land located within a Community Drinking Water Protection Zone, the Community Drinking Water Supply.
Sub-Area	means a Sub-Area as shown on Plan CRC252218A
WIL PA Equivalent Farm	any property that meets the Permitted Activity Criteria where the consent holder has chosen to manage the property as a WIL PA Equivalent Farm.
WIL GMP Loss	means the nitrogen loss below the root zone, as: <ul style="list-style-type: none"> • modelled using the most recent version of OVERSEER® for a Property or Farming Enterprise (as might apply) based on the farming activity carried out for the 2019 year (provided that any intensification included in the assessment must have occurred no later than 20 July 2019), that has been run through either the Environment Canterbury Farm Portal or the Environment Canterbury Equivalent Pathway tool; or • as assessed using the Alternative Methodology Advice Note: <i>Use of the WIL GMP Loss is intended to be consistent with the requirements of Policy 8.4.29 of the Canterbury Land and</i>

	<i>Water Regional Plan as at the Commencement Date (but with the use of 2019 input data, as is consistent with the data available to the consent holder).</i>
WIL Irrigation Scheme	means the irrigation scheme operated by the consent holder that takes water from the Waimakariri River for the purposes of supplying water to land between the Waimakariri and Ashley Rivers.
Winter Grazing	means the grazing of cattle within the period 1 May to 30 September, where the cattle are contained for break-feeding of in-situ brassica and root vegetable forage crops or for consuming supplementary feed that has been brought to the property.

Appendix 3 WIL Scheme Properties



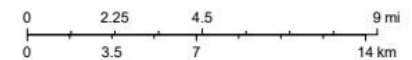
WIL Scheme Community Drinking Water Protection Zones




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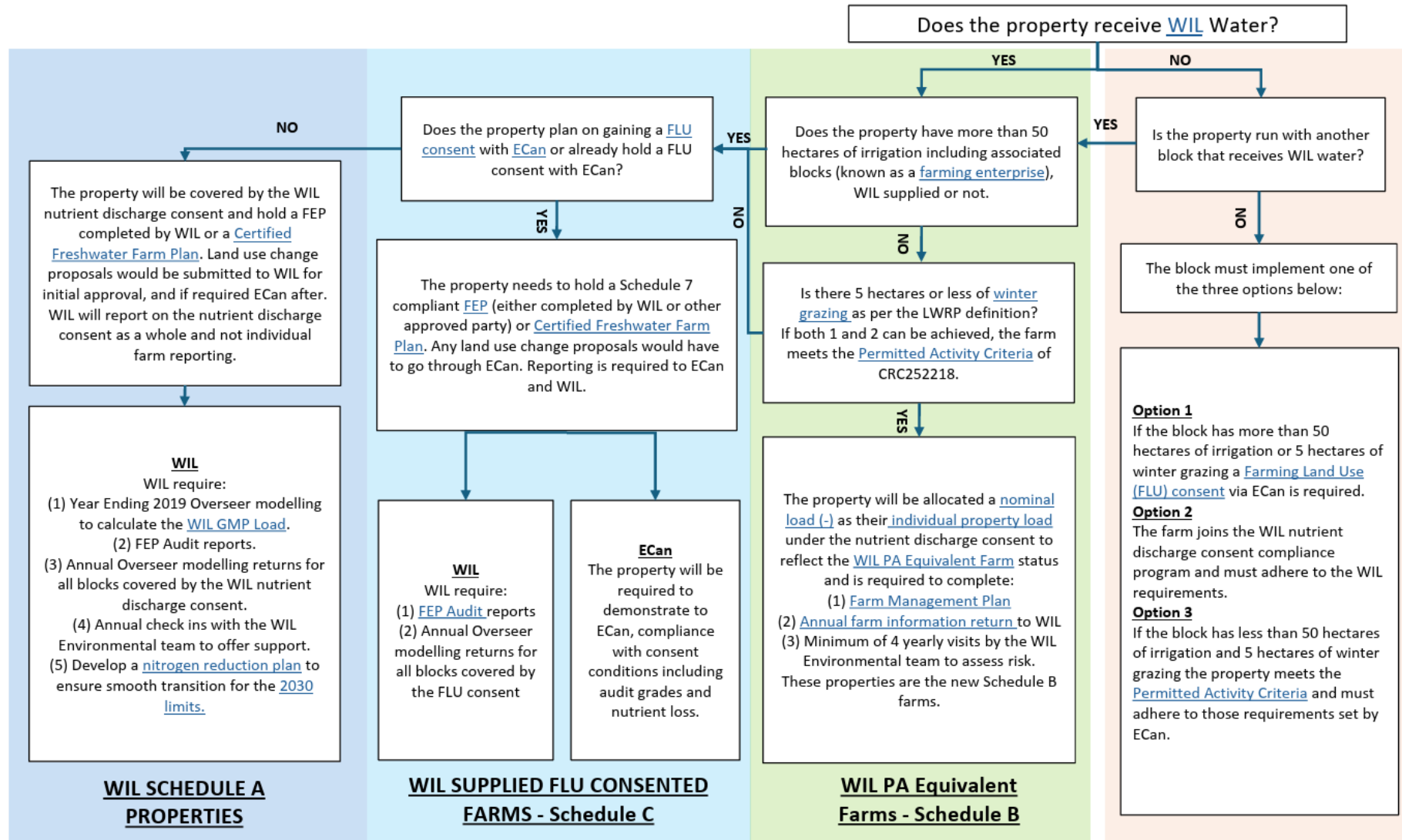
- Farm Boundary
- Community Drinking Water Protection Zones

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 Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

WIL NUTRIENT DISCHARGE CONSENT (CRC252218) REGIME



Key Definitions

Farming Enterprise means an aggregation of parcels of land held in single or multiple ownership (whether or not held in common ownership) that constitute a single operating unit for the purpose of nutrient management.

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

Permitted Activity Criteria means any property where:

- the total area irrigated is 50 hectares or less and no more than 10 hectares above what was irrigated at 20 July 2019; and
- the total area used for Winter Grazing is 5 hectares or less.

WIL PA Equivalent Farms means any property that meets the Permitted Activity Criteria where the consent holder has chosen to manage the property as a WIL PA Equivalent Farm.

FEP Audit means an audit completed in accordance with the Canterbury Certified Farm Environment Plan Auditor Manual (November 2022) by a Certified Auditor.

Farming Land Use (FLU) consent means a Farming Land Use consent authorising the farming operation on the identified parcel or parcels of land.

'-' Nominal Load is allocated to a property that can operate within the Permitted Activity restrictions as defined in the LWRP Waimakariri Chapter. This allocation reflects this status. These farms will be covered by the WIL nutrient discharge consent and are still required to submit certain information to WIL.

Individual Property Load means the nitrogen load calculated for each individual Property in accordance with conditions 5 to 8 of CRC252218.

Annual farm information return relates to WIL PA Equivalent Farms. The annual farm information return will include information on fertiliser use, irrigation information, winter crop information, stock information, farm infrastructure information, and supplement information.

Farm Management Plan means a shortened version of a Farm Environment Plan in the form set out in Schedule CRC252218 E, detailing landholding, key infrastructure, land use, and risk.

ECan means the Canterbury Regional Council known as Environment Canterbury.

WIL means Waimakariri Irrigation Limited (the Scheme).

FEP means a Farm Environment Plan that has been prepared in accordance with CRC252218 D

Certified Freshwater Farm Plan means a freshwater farm plan certified under section 217G of the Resource Management Act 1991

Nitrogen reduction plan means a plan that has been developed by the shareholder or representative that gives clarity on how a farming operation will achieve the nitrogen reduction limits by 1 January 2030.

2030 limits means the reduction targets as set out in Table 8j of the LWRP. The reduction for each land use type only applies to the area of that land use. For some properties a weighted average will be calculated.

WIL GMP Load means the discharge of nitrogen below the root zone from the Year Ending July 2019 at the ECan GMP equivalent (either the Farm Portal or Environment Canterbury Equivalent Pathway tool).

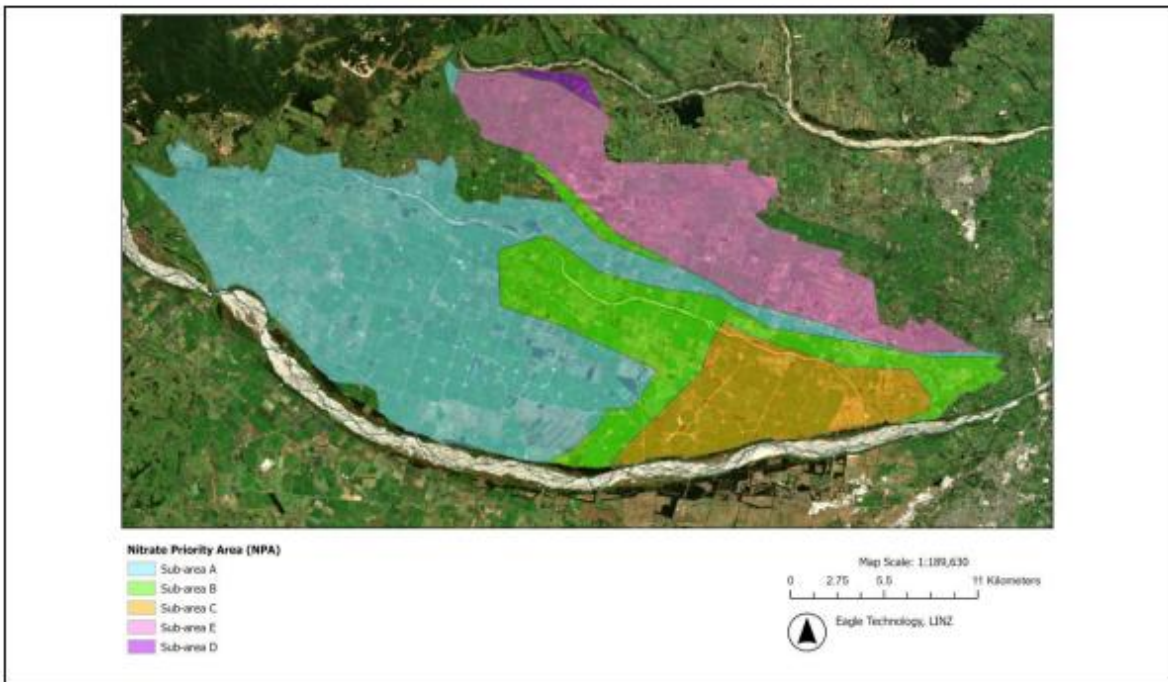
WIL Nutrient Discharge Consent Overview and WIL Approved Farm System	 Waimakariri Irrigation Limited
Date: Prepared by: Overseer Version:	

DISCHARGE CONSENT OVERVIEW


WIL holds a global nutrient discharge consent for shareholders; this consent negates the requirement for shareholders to gain a Farming Land Use consent. Properties not operating under an umbrella type consent require their own individual Farming Land Use consents.

Since 2016, WIL has operated under CRC184861, this consent has now been replaced by CRC252218. The new consent has different conditions that reflect the requirements of the Land & Water Regional Plan Waimakariri rules. The WIL command area is no longer split into red, orange and green zones, instead it is split into 6 nitrate management areas including an area not within a zone. The new consent requires the baseload to be calculated at GMP equivalent through the ECan Farm Portal, this is a requirement for any property since 2020. The WIL nutrient discharge consent uses 2019 as the base year rather than the typical baseline of 2009-2013. Analysis showed the 2019 period gave a larger scheme nitrogen load. Properties are required to make reductions from the 2019 baseload (at GMP) by 2030 (20% dairy and 5% all other farm types) and 2040 (additional 10% for dairy and 5% for all other farm types).

The nutrient discharge consent allows WIL to develop an alternative to the ECan GMP Farm Portal, this will be developed and implemented once approval can be gained from ECan. Baseloads and 2030 targets will be adjusted and circulated accordingly.



- KEY REQUIREMENTS OF THE NEW CONSENT FOR WIL:**
- Calculate nitrogen loads for each of the nitrogen priority areas (NPA)
 - Operate within the nitrogen base load for each NPA
 - Achieve the 2030 nitrogen reduction limits
 - Maintain a scheme map of all shareholders covered by the nutrient discharge consent
 - Maintain and up to date FEP (or FWFP) and compliant audit grades
 - Continue the water quality monitoring programme

WIL Nutrient Discharge Consent Overview and WIL Approved Farm System
<div style="text-align: right; font-size: small; font-weight: bold;">  </div> <p style="text-align: center; margin-top: 10px;">WIL APPROVED FARM SYSTEM</p> <p>To ensure WIL can maintain compliance with the nutrient discharge consent, it is important shareholders farm within some prescribed thresholds. If you are planning on making a change on farm, it is important you contact the WIL Environmental team to discuss the change as WIL has to have confidence the change can be made within the farm's thresholds. Some changes require WIL board approval before being implemented.</p> <p>If you have any questions on these thresholds, do contact WIL to discuss. If there is good evidence to show these thresholds are incorrect, they can be adjusted. The nitrogen loss and load figures have all been based on Overseer (6.5.12), as Overseer updates the nitrogen figures will change accordingly.</p>

GMP BASE FARM SYSTEM INFORMATION	
Enter Farm Name	Farm Details
Total Farm Area (ha)	
Effective Farm Area (ha)	

Irrigation Type	<i>Pivot</i>	<i>Traveller</i>	<i>Sprinklers</i>	<i>Fixed Grid</i>	Total (ha)
Irrigation Area (ha)					
Land Use	<i>Dairy</i>	<i>Dairy Support</i>	<i>Sheep & Beef</i>	<i>Arable</i>	<i>Deer</i>
Land Use Area (ha)					
Stock Type					
Peak Stock Numbers					
Time on Farm					
Stocking Rate (RSU)					
Effluent Area (ha)	** if applicable				
Winter Crop Type					
Winter Crop Area (ha)					

BLOCK	TOTAL AREA (ha)	EFFECTIVE AREA (ha)	N LOSS (kg N/ha)	TOTAL N LOSS (kg N)
1				
2				
3				
4				
5				
ENTERPRISE TOTAL	0	0	#DIV/0!	0

Declaration

I, _____, declare that the information provided in this form (and any attachments) is complete, accurate, and not misleading to the best of my knowledge and belief.

I acknowledge that Waimakariri Irrigation Limited (WIL) may rely on this information to meet scheme administration requirements and to support compliance and reporting obligations.

If I become aware that any information provided is incorrect or changes materially, I will notify WIL as soon as practicable and provide updated information.

Signed: _____ Date: _____

Name: _____

Shareholding Entity: _____

Position: Director Owner Director Manager Agent

Farm Map

Insert farm map here