

EMSFEP-003 – FEP Audit Follow Up

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1 Introduction

Farm Environment Plan audits are an essential component of the farm planning process to ensure actions identified to mitigate risks in the Farm Environment Plan are being implemented and to support farmers with continuous improvement in their farm systems.

All Farm Environment Plan (FEP) Audits will be completed by a suitably qualified professional in accordance with [EMSFEP-002](#) and all MHV shareholders need to be achieving or working towards an “A” audit grade.

This procedure details the processes in place to identify MHV shareholders who are not achieving or working towards an “A” audit grade and the steps that will be taken to get them back on track.

2 Purpose

The purpose of this document is to identify those at risk of not achieving good management practice, work with them to drive continuous improvement on-farm and to satisfy conditions of resource consent CRC185857, which state:

Condition 13

The EMS shall provide for or require:

...

- c) *Properties provided for in Conditions 4(a) and (b) shall:*
- i. *have their annual nutrient losses assessed in accordance with the Matrix Method identified in Schedule CRC185857B;*
 - ii. *be subject to an audit procedure in accordance with Condition 19 and 20 (with the EMS being required to specify the steps that will be taken (including consequences to ensure future compliance) for Properties where condition 12(b)(iii) applies and is not being met).*

3 FEP Audit Grade

Farm Environment Plans Audit grades are assessed by an ECan accredited, Farm Environment Plan Auditor, in accordance with EMSFEP-002 and the [Canterbury Certified Farm Environment Plan Auditor Manual May 2020](#). The FEP Audits assess properties against the objectives and targets specified in schedule CRC185857C of resource consent CRC185857, as well as those who have implement (or in the process of implementing) Advanced Mitigation and assess farm systems against their Authorised Land Use (ALU) or Permitted Land Use (PLU) as may apply. A summary of the grades and what they mean are detailed in Table 1.

Table 1: FEP Audit Grades Summary

Audit Grade	Description	Compliance Status
AM	All objectives and targets met to Advanced Mitigation standards	Consistent with Condition 13(c)(ii)
A	All objectives and targets met to Good Management Practice standards	Consistent with Condition 13(c)(ii)
B	On track to meet Good Management Practice	At risk of not being consistent with Condition 13(c)(ii)

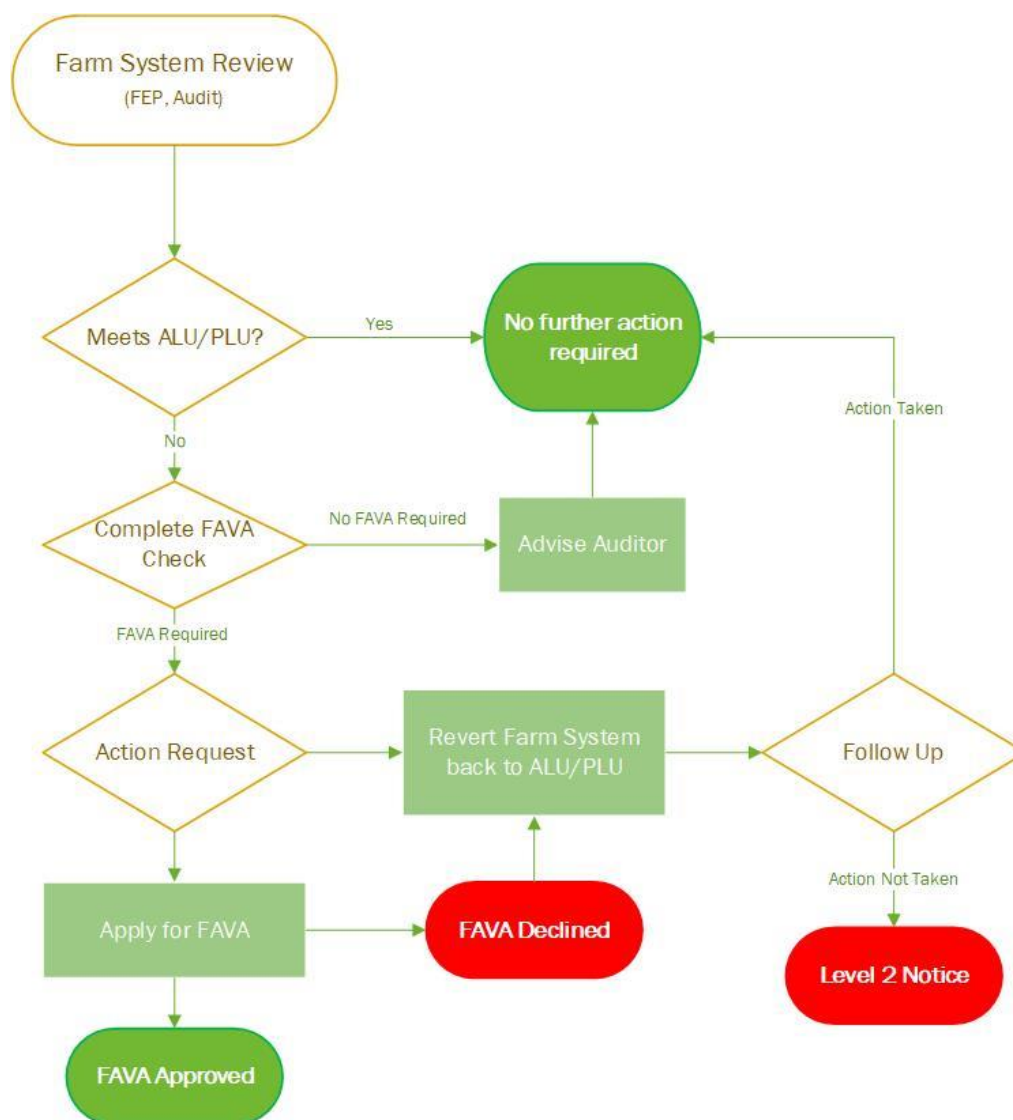
Audit Grade	Description	Compliance Status
C	Not on track to meet Good Management Practice	Not consistent with Condition 13(c)(ii)
D		Not consistent with Condition 13(c)(ii)
EMS Requirements Met	Farm meets MHV Water EMS requirements	Complies with water agreement
EMS Requirements not Met	Farm does not meet MHV Water EMS requirements	Does not comply with water agreement

4 EMS Requirements Not Met Follow Up

4.1 Nutrient Management

Properties which operate outside their Authorised Land Use (ALU) or Permitted Land Use (PLU) as identified in their audit are in breach of their water user agreement and may be subject to the processes detailed in Non-Complying Shareholder Policy.

Prior to enacting the Water Agreement, the steps detailed below will be taken.



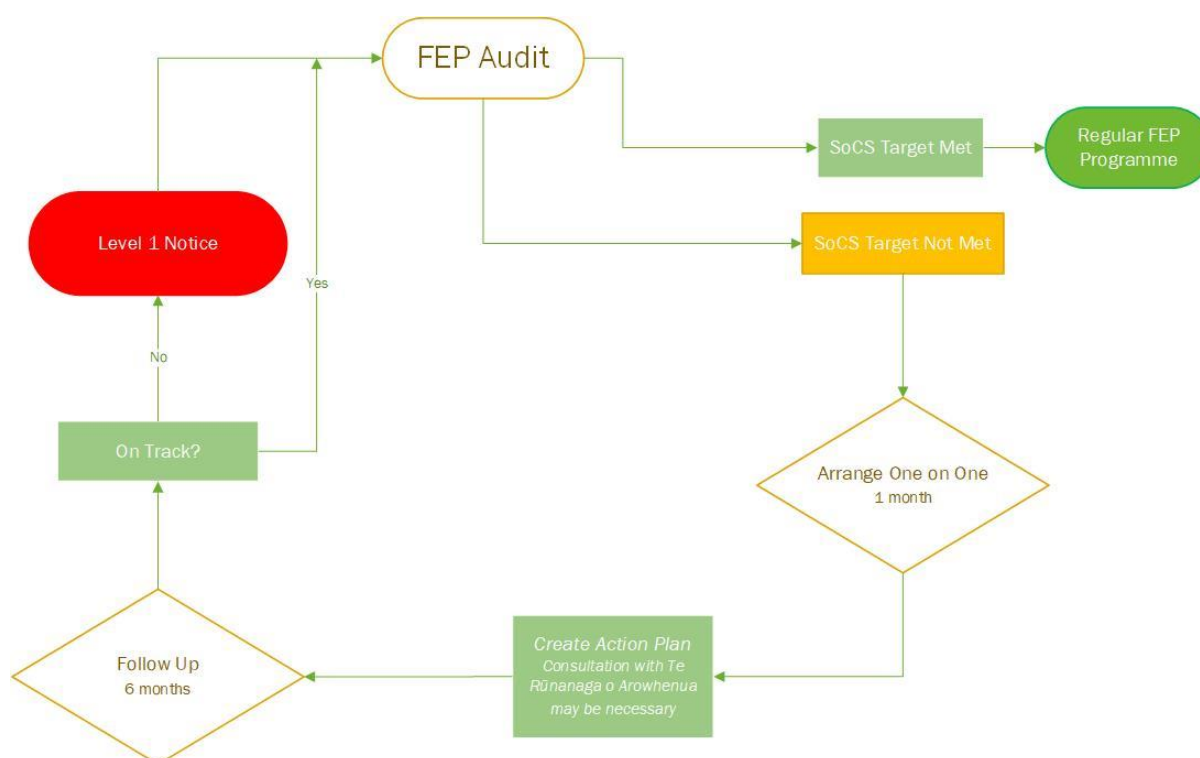
Timeframes to take action need to be reasonable and achievable, so may vary on a case-by-case basis at the discretion of the MHV Water Chief Executive.

4.2 Farm Activity Variation Application

As part of the FEP Audit, the Auditor will assess if the conditions of the Farm Activity Variation Application (FAVA) are met. The condition related to the PLU is addressed above (4.1). Where other conditions of the FAVA are not met, the MHV Water Environmental Team will follow up with the shareholders as if it was issued a “B” grade (condition not essential for approval) or a “D” grade (condition was essential for approval) as described in section 5 below.

4.3 Sites of Cultural Significance

Where actions were not implemented to avoid, remedy, or mitigate effects on Sites of Cultural Significance, the following steps will be taken.



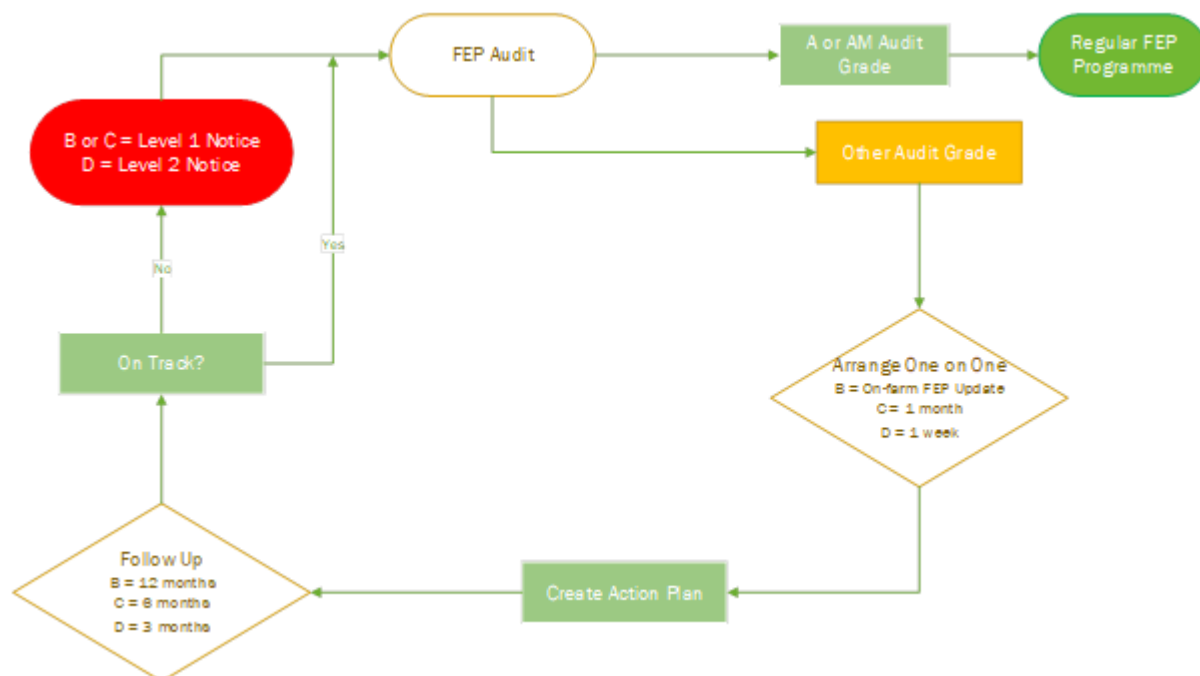
5 FEP Audit Follow Up Process

Shareholders may receive recommendations for improvements when given an “A” or Advanced Mitigation grade, however it is expected the Shareholders will be pro-active in implementing these recommendations and will not be actively follow up until their regular FEP update or next audit, whichever is sooner.

Shareholders who received “B”, “C” or “D” grades are not on track to meet the requirements of their FEP and need to be supported to improve their grade during their next audit cycle through the process described below.

Repeated “B”, “C” or “D” grades will escalate through the sanction process detailed in the Non-Complying Shareholder policy. However, MHV Water may use their discretion should exceptional circumstances apply.

If there has been a grade dispute, the FEP Audit follow up process will not commence until the grade dispute is settled.



6 Relevant Documents

Document
Resource Consent CRC185857
MHV Water Environmental Management Strategy
Canterbury Certified Farm Environment Plan Auditor Manual May 2020
MHVOP – Non-Complying Shareholders Policy
EMSNM – 001 Authorised Land Use Policy
EMSFEF – 002 FEP Audits

7 Document Management Control

Version	Date Reviewed	Purpose / Amendments	Section Reviewed	Reviewer	Status
1.0	May 2022	Development of EMSFEF - 003	All	Eva Harris	FINAL DRAFT
1.0	May 2022		All	Mel Brooks	Approved