

From: [Moutere Station](#)
To: [RPS](#)
Subject: Submission
Date: Friday, 3 September 2021 2:54:16 p.m.
Attachments: [pRPS submission_Moutere Station.pdf](#)

Pease see attached our submission for the pRPS

Moutere Station Ltd

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Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. Name of submitter (full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)

Moutere Station

2. This is a submission on the Proposed Otago Regional Policy Statement 2021.
3. I could/could not (Select one) gain an advantage in trade competition through this submission. (See notes to person making submission)
4. I am/am not (Select one) directly affected by an effect of the subject matter of the submission that
 - a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition (See notes to person making submission)
5. I wish/do not wish (Select one) to be heard in support of my submission
6. If others make a similar submission, I will/will not (Select one) consider presenting a joint case with them at a hearing
7. Submitter Details

- a. Signature of submitter (or person authorised to sign on behalf of submitter)

- b. Signatory name, position, and organisation (if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)

Name: Hamish Jopp

Position: Director/Owner

Organisation: Moutere Station

- c. Date

3/9/2021

Address for service of submitter (This is where all correspondence will be directed)

d. Contact person (name and designation, if applicable)

Hamish Jopp & Andrew Jopp

e. Email:

office@mouterestation.co.nz

f. Telephone:

03 447 3726

g. Postal address (or alternative method of service under [section 352 of the Act](#)):

Moutere Station, RD3, Alexandra 9393

8. My submission is:

Background

Moutere Station is an 8,000ha extensive Merino Sheep & Beef property located along the Dunstan Range in the Manuhereka Valley, Central Otago. It has been under the ownership and management of the Jopp family for 130 years and this has led to a vast family knowledge and understanding of the land and its environment. We take pride in our property and want to see its values and biodiversity protected for generations to come.

Moutere Station is home to a population of indigenous Central Otago Roundhead Galaxias. This species is listed as nationally endangered and recent records indicate that the species has declined significantly. The Moutere Station population was discovered by an expert carrying out an ecological assessment on Moutere's waterways. It is noted in the expert's report that the population is most likely benefiting from the absence of brown trout and that it is important that this exclusion continues. This exclusion has occurred because of the deemed permit water right that has been in place for over 100 years and in essence has been the reason this population of endangered indigenous fish has been retained. We have now entered into a management program with a native fish expert to maintain and hopefully grow this rare population. An overly restrictive and one size fits all legislation will put this population and its habitat at risk

Submission

Moutere Station Limited submits that the proposed Regional Policy Statement (pRPS) does not sufficiently take into consideration the positive impact of agriculture in Central Otago nor mitigate the negative impact that the adoption of the pRPS will have on agriculture in Central Otago.

The description in the PRPS accurately identifies that Otago's economy centres around agriculture. Central Otago was founded on agriculture and it contributes significantly to the local and international economy. Yet, there is not adequate consideration for the positive economic outcomes in any of the Domains or Topics. It is mentioned in the background but not adopted as a principle for consideration.

The PRPS does not adequately take into consideration the complexity of agricultural businesses. The regulatory environment that farms operate in has become increasingly complex. The natural and anthropogenic systems that impact us include: climate variability, climate change, ecological, hydrological, social, cultural, and political. We are also impacted by financial and commodity markets. We need to be able to adapt to these pressures and to maintain the ability to find intuitive and innovative solutions.

We submit a principles-based approach for farming regulation should be adopted as this will lead to better environmental outcomes. Farm environmental plans should be utilised as a permitted activity standard and as the primary means of adopting a principles-based approach to the management of farm systems. This will require a high trust model but it has the potential to significantly improve environmental outcomes, with much less regulatory cost and delay. The plans could require the adoption of Good Management Practices as applicable to the particular farming system in place on the land, with additional Targeted Management Practices being applied in catchments where there are particular aspects of concern that warrant additional rigour.

<i>The specific provisions of the proposal that my submission relates to are:</i>	<i>I support or oppose the specific provisions or wish to have them amended.</i>	<i>The reasons for my views are:</i>	<i>I seek the following decision from the local authority:</i>
<i>(Please enter the relevant objective, policy, method, or other provision reference where possible. For example, 'AIR-01'.)</i>	<i>(Please indicate "support" or "oppose" or "amend")</i>		<i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i>
PRPS	Amend	The land use provisions noted throughout the document would likewise restrict the rights of landowners.	

		<p>Not all indigenous species need to migrate and movement of other non-indigenous species could have a detrimental effect on those indigenous species we are seeking to protect like the population of Central Otago roundhead Galaxias on Moutere Station</p>	<p><u>where required to complete their lifecycle</u> indigenous species migrate easily and as naturally as possible along and within the river system</p>
LF-VM-O2 (5)	Amend	<p>Moutere Station produces sheep meat and beef but also produces some of the best wool fibre in the world. We believe that the production of fibre should be recognised as important alongside that of food production</p>	<p>Innovative and sustainable land and water management practices support food and fibre production in the area and...</p>
LF-VM-O2 7 (b) (ii)	Amend	<p>Sustainable abstraction can continue from tributaries</p>	<p>Sustainable abstraction occurs from main stems or groundwater in preference to tributaries where practicable</p>
LF-VM-O2 7 (b) (iii)	Amend	<p>Continuous water flow could provide for the movement of non-native fish at the detriment of non-migratory indigenous species</p>	<p><u>where appropriate</u> water flow is continuous throughout the whole system</p>
LF-FW-O8 (2)	Amend	<p>Not all native fish need to migrate and this objective could provide for the movement of non-native fish at the detriment of non-migratory indigenous species</p>	<p><u>Where appropriate</u> native fish can migrate easily and as naturally as possible....</p>
LF-FW-O8 (4)	Amend		

LF-FW-P7	Amend	<p>Providing for fish passage could cause non-native fish movement which could be at the detriment of some indigenous fish species</p> <p>This could result in an outcome that is the opposite of what is intended. By way of example, the indigenous Central Otago Roundhead Galaxias population at Moutere Station would be put at risk.</p>	<p>the habitats of indigenous species associated with water bodies are protected, including by providing for fish passage</p>
LF-FW-P13 (4)	Oppose	<p>The risk with adopting a rules-based approach to restrict activities may lead to perverse outcomes and contradict the values set out in the policy statement.</p>	
LF-FW-P13 (8)	Oppose	<p>Many waterways throughout Otago have been extensively modified for many generations, returning them to a natural state may not be practical or to the benefit of the environment</p>	<p>..., promote actions where <u>appropriate</u> that:</p>
LF-FW-P14	Amend		
LF-LS-P18 (1)	Oppose	<p>This is a large topic which needs more science behind it to understand the full effects</p>	
LF-LS-P20	Oppose	<p>People should be able to manage their land and land use as they see fit providing, they meet all regulations</p>	

LF-LS-P21 (2)	Oppose	People should be able to manage their land and land use as they see fit providing, they meet all regulations	
LF-LS-M11 (1) (b)	Oppose	This is a large topic which needs more science behind it to understand the full effects	
ECO	Support in part	Moutere Station supports the objectives of the ORC to have healthy and thriving indigenous biodiversity however landowners need to be recognised for the work they do in managing their own land and biodiversity	
ECO-M6 (3)	Support	Moutere Station supports the direct consultation with landowners and occupiers whose properties potentially contain significant natural areas	