



Proposed Otago Regional Policy Statement 2021

Information for Submitters

Submissions must be in the prescribed form (Form 5) specified by the Resource Management Act and must be received by Otago Regional Council **by 3 pm Friday 3 September 2021**

Privacy: Be aware that **all submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 5 is provided below. Once completed, please forward to ORC by one of the following:

Email: rps@orc.govt.nz Submissions in MS Word or other editable format are preferred, if possible

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: ORC Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, 70 Stafford St, Dunedin, Att: ORC Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: ORC Policy Team

Alexandra: William Fraser Building, Dunorling Street, Alexandra. Att: ORC Policy Team

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

NOTES TO PERSON MAKING A SUBMISSION

If you are a person who could gain an advantage in **trade competition** through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be **struck out** if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Go to Written Submission Form on next page

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)*

Southern Inshore Fisheries Management Company Limited

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: Carol Scott

Position: Chief Executive

Organisation- Southern Inshore Fisheries Mgt Co Ltd

c. Date

2 September 2021

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

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

Carol Scott

e. Email:

cscott@southerninshore.co.nz

f. Telephone:

0274536602

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

PO Box 175, Nelson, 7040

8. My submission is:

Column 1	Column 2	Column 3	Column 4
<p>The specific provisions of the proposal that my submission relates to are:</p> <p>(Please enter the relevant objective, policy, method, or 'other' provision reference)</p>	<p>I support or oppose the specific provisions or wish to have them amended.</p> <p>(Please indicate "support" or</p>	<p>The reasons for my views are:</p> <p>INCLUDING BUT NOT LIMITED TO IN ALL RESPONSES:</p>	<p>I seek the following decision from the local authority:</p> <p>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</p>

where possible. For example, 'AIR-O1'.)	"oppose" or "amend")"		
Part 2- SRMR- 10 Inclusion of "fishing" alongside agriculture and minerals extraction as changing landscapes and habitats.	Oppose	Combining fishing with the impact of land-based activities is not correct. It needs to be treated independently and with separate evidence of impact.	"Fishing" is removed from the sentence.
RMIA-CE-12 "disposal of waste from both land development and <i>marine vessels</i> ..."	Oppose	The specific concerns of "lengths of rope from boats and moorings", "discarded and lost fishing gear" is a small contributor in the list of concerns. The paragraph above references "both land developments <i>and marine vessels</i> is culturally offensive..."	Change "both land development and marine vessels" to "activities that occur on land and in the marine environment".
IM-P2 Decision priorities	Oppose	These stretch the stated purpose of the RMA 1991 well beyond what is required in the RPS	Remove "firstly", "secondly" and "thirdly"
IM-P6 Acting on best available information	Oppose	"local knowledge" is not specific enough.	Add "stakeholder input"
		"reliable partial data"	Remove
IM-P8 Climate change impacts	Oppose		Include consultation requirement for identifying impacts
IM-P15 Precautionary approach	Oppose		

IM-M2 (2) Relationships	Oppose	“work together and with other agencies ...”	Include “(including stakeholders)”.
IM-E1 Explanation	Oppose	Applying NZCPS to management of resources throughout Otago is flawed.	Adjust sections where this has occurred and reframe where necessary.
IM-AER2 Anticipated environmental results	Oppose	Stating IM-AER2 this way stretches the purpose of the RMA and therefore imposes a higher threshold than what is required in the RPS.	Change to “Sustainable social, cultural, and economic well-being is resulting in environmental well-being and resilience.”
CE-01 Safeguarding the coastal environment		<p>Much of this is reworked NZCPS, however, substituting words and moving them around has the effect of higher thresholds than are required by the CPS. Whether this is an unintended drafting outcome or a purposeful strengthening of “environment precedence” it goes beyond the CPS and should be removed or adjusted.</p> <p>Commercial fishing has also not been referenced specifically. While it could be considered under “existing uses or activities”, excluding commercial fishing leaves room for uncertainty. Given an earlier acknowledgment of the important role in local economics the industry ought be referenced for clarity.</p> <p>Commercial fishing most likely was not included in the CPS originally as when it was drafted appropriate consideration was given to the management of the marine environment by the Fisheries legislation. “Coastal environment” had not been stretched into the marine space.</p>	<p>Add a section at CE-P10/11</p> <p>“- Commercial fishing</p> <p>Recognise and provide for the role of commercial fishing activity in the region in contributing to the social, cultural and economic well-being of individual and communities by:</p> <ol style="list-style-type: none"> (1) Involving commercial fishing stakeholders in decision making and management processes in respect of fishing in the coastal marine environment. (2) Involving Fisheries New Zealand alongside the Department of Conservation in management and implementation. (3) Provide for the development and operation of commercial fishing activities, taking into account: <ol style="list-style-type: none"> a. The need for high water quality required for healthy fish stocks for commercial fishing. b. The need for land-based facilities and infrastructure

		As commercial fishing activities are not directly referenced we propose the following, not dissimilar to the Aquaculture provisions.	required to support the operation of commercial fishing activities; and c. The potential social, economic and cultural benefits associated with the operation and development of commercial fishing.
(1)	Oppose	“restored where is has degraded” is a higher threshold than the CPS “enhanced where deteriorated”	Change to “enhanced where is has deteriorated” or delete if you are just rewording the CPS, do not add to it.
(2) coastal water quality	Oppose	“existing activities”	Change to “existing activities including commercial fishing and food production”.
CE-02 Maintaining or enhancing highly valued...”	Oppose	“Highly valued” is not in the CPS. “maintained or enhanced” is reworded from the CPS.	Remove “highly valued” to then be in line with Objective 2 CPS. Change “maintained or enhanced” to “preserve and protected” to be in line with Objective 2 CPS
CE-03 Natural character, features and landscapes	Oppose	“Inappropriate activities”	Remove or elaborate.
CE-05 Activities in the coastal environment	Oppose	Is more restrictive than what is in the CPS. ECO-P7 (Coastal indigenous biodiversity) relies on CE-05 for management and implementation to achieve ECO-01. CE-05 does not give adequate effect to ECO-01.	
CE-P2 Identification (2)	Oppose	Water quality should be appropriate for protecting the safe use of the coastal marine area for food production.	Add “such as, aquaculture, commercial fishing, shellfish gathering...”

CE-P3 Coastal water quality	Oppose	"CE-P1(2)" should be CE-P2(2)	Change
(3) "existing uses"	Oppose	"existing uses" does not specify commercial fishing activity.	Add "existing uses (including commercial fishing) of coastal water..."
CE-P4 Natural character	Oppose		Remove "high and outstanding".
CE-P6 Natural features, landscapes and seascapes	Oppose	"seascapes" in the CPS is only added in the body, not title.	Remove "seascapes" from the title
(4)	Oppose	"promoting restoration or enhancement..." stretches the CPS threshold of "restoration or rehabilitation"	Change "restoration or enhancement" to "restoration or rehabilitation".
CE-P10 Activities within the coastal marine area	Oppose	Goes above and beyond the purpose of the CPS in slitting activities into "land" in CE-P9 and "coastal marine area" in CE-P10.	(1) Change to "enable multiple uses of the coastal marine area recognising potential contributions to the social, economic and cultural wellbeing of people from use and development pf the coastal marine area."
CE-M Methods	Oppose	The role of other government agencies in identifying and implementing is not stated. The fundamental application of higher legislation that addresses areas of key importance in the coastal environment (such as the Fisheries Act) need to be considered and accounted for.	
CE-PR1 Principal reasons	Oppose	"local authorities may also choose to adopt additional non-regulatory methods to support the achievement of the objectives".	Remove or specify.

CE-AER1	Oppose	“inappropriate uses”	Remove or specify
CE-AER2	Oppose	“identified areas of high and outstanding natural character...”	Remove “high and outstanding”.
CE-AER3	Oppose	“Areas where natural character has been reduced or lost are restored.” Restored is beyond the purpose of the RMA and CPS.	Remove “restored”.
CE-AER5	Oppose	Does not include commercial fishing and food production.	Change to “and provides for contact recreation, commercial fisheries and food production as well as customary uses.”
Note: Additional rows for each separate provision or submission point should be added as required.			

RPS

From: Carol Scott <cscott@southerninshore.co.nz>
Sent: Thursday, 2 September 2021 12:24 p.m.
To: RPS
Subject: Otago RPS Submission 2021 Southern Inshore Fisheries Mgt Co Ltd.docx
Attachments: Otago RPS Submission 2021 Southern Inshore Fisheries Mgt Co Ltd.docx

Categories: Submission - Sector stakeholder

Please find attached a submission on the Proposed Otago Regional Policy Statement 2021 from Southern Inshore Fisheries Management Company Limited.

Can you please receipt delivery of this submission by return email

Kind regards
Carol Scott

Carol Scott
Chief Executive
Southern Inshore Fisheries Management Co. Ltd
PO Box 175, Nelson, 7040
(side office suite, 98 Vickerman Street)
Email: cscott@southerninshore.co.nz
Mobile: 0274 536602
www.southerninshore.co.nz