

From: [Eleanor Linscott](#)
To: [RPS](#)
Cc: [Hilary Walker](#)
Subject: PORPS Further Submission
Date: Friday, 12 November 2021 4:21:44 p.m.
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[FFNZ Further submission proposed ORC RPS form 6.pdf](#)

Hi

Please find attached Federated Farmers further submission on the proposed Otago Regional Policy Statement.

Kind regards

Eleanor

ELEANOR LINSCOTT

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FURTHER SUBMISSION



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Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: **Otago Regional Council**
E – rps@orc.govt.nz

From: **Federated Farmers of New Zealand**

On the: **Proposed Otago Regional Policy Statement**

Date: **12 November 2021**

Contact: **Eleanor Linscott**
Senior Policy Advisor

Federated Farmers of New Zealand
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Name of person making further submission:
Federated Farmers of New Zealand

This is a further submission in support of and opposition to submissions on the following proposed plan,

**Proposed Otago Regional Policy
Statement**

Where Federated Farmers submitted on the same point as any other submitter it stands by its original submission. This Further Submission seeks only to provide Federated Farmers views on points raised by other submitters that are not already covered in our original submission.

I am

- *a person representing a relevant aspect of the public interest;*
- *a person who has an interest in the proposal that is greater than the interest the general public has.*

Grounds for further submission:

Federated Farmers of New Zealand is a representative body for farmers, so both represents a relevant aspect of the public interest and has an interest in the proposal that is greater than the interest that the general public has

I support and oppose the submission of:

Submitters stated in the schedule attached to this further submission.

The particular parts of the submissions I support and oppose are:

Variously stated with respect to respective submitters in the schedule attached to this further submission.

The reasons for my support and opposition are:

Variously stated with respect to respective submitters in the schedule attached to this further submission.

I seek that the whole or part of the submission be accepted or rejected:

As variously stated with respect to respective submitters in the schedule attached to this further submission.

I wish to be heard in support of my further submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

I acknowledge that by taking part in this public submission process the submission (including names and addresses) will be made public.



Eleanor Linscott

Eleanor Linscott on behalf of Federated Farmers of New Zealand
(person authorised to sign on behalf of person making further submission)

Date: 12 November 2021

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Contact person: Eleanor Linscott - Senior Policy Advisor

Schedule:

The particular parts of the submission I support (or oppose) are:

Submitter	Original submission point number	Support OR Oppose	The reasons for my support/opposition are:	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
HortNZ	00236.096	support	The amendments and new provisions sought: Aligns with intentions of FFNZ submission - Allowing for new rural chapter is reflective of an integrated management approach	allow
NZ Pork Industry Board	00240.033	support	The amendments and new provisions sought: Aligns with intentions of FFNZ submission Allowing for new rural chapter is reflective of an integrated management approach	allow
Queenstown Airport Corporation	00313.042	support	A potential solutions approach that allows for a planning process for those parts of the proposed RPS that do not genuinely relate to freshwater, in accordance with s80A(3) should be explored as an option	allow
Oceana Gold	00115.033	support	The cost of implementing proposed provisions is a serious consideration for the primary sector.	allow
Waitaki district council	00140.007	support	A revised s32 analysis would help provide clarity	Allow

			around how the mana whenua chapter is interpreted in the context of the wider document	
Royal Forest and Bird Protection Society of New Zealand Incorporated	Full submission	oppose	The amendments and new provisions sought: - Are not the most efficient and effective way to achieve the objectives or purpose of the Act - Are inconsistent with integrated management	Disallow, other than where the decision sought aligns with decisions sought in FFNZ's original submission or where FFNZ has supported specific Forest & Bird submission points as set out in this further submission
OWRUG	00235.006	support	Aligns with FFNZ general submission. Aligns with integrated management vision	Allow
Director-General of Conservation	00137.004	support	More detail and clarity would be beneficial in terms of understanding and interpretation	Allow
Horticulture New Zealand	00236.007	support	Food production is a critical part of our rural communities	Allow
New Zealand Pork Industry Board	00240.001	support	Our rural communities grow our food, fibre, and feed. It is a critical part of our wellbeing and should be prioritised	Allow
Wise Response Society	00509.008	oppose	The amendments and new provisions sought are not the most efficient and effective way to achieve the objectives or purpose of the Act	disallow
Horticulture New Zealand	00236.008	support	Recognising the importance of the region in growing our food, fibre and feed.	support
New Zealand Pork Industry Board	00240.002	support	Recognising the importance of the region in growing our food, fibre and feed	support

Horticulture NZ	00236.009	support	Support the avoidance of duplication and providing clarity for landowners	allow
Horticulture New Zealand	00236.010	support	A rural advisory panel would help provide clarity and understanding with landowners	Allow
OWRUG	00235.007	support	A rural advisory panel would help provide clarity and understanding with landowners	Allow
Te Ao Marama	00223.013	oppose	Oppose amendment sought. To widen to include all activities is too broad and will only make interpretation more confusing	Disallow
New Zealand Infrastructure Commission	00321.106	support	Support that there should be inclusion of specific reference of economic infrastructure without which the economies of Otago cannot function – especially in terms of rural sector	allow
OWRUG	00235.020	support	A glossary of te reo terms would be helpful	Allow
Beef & LambNZ and DeerIndustry NZ	00237.006	support	A new definition of agricultural intensification would provide clarity	Allow
Horticulture New Zealand	00236.012	support	Provides clarity	allow
Queenstown Lakes District Council	00138.028	support	Provides clarity	allow
Dunedin City Council	00139.127	support	Provides clarity	allow
Queenstown Lakes District Council	00138.027	neutral	Is there a more generalised definition of 'ecological district'	neutral
OWRUG	00235.125	support	Adds clarity	allow
Queenstown Lakes District Council	00138.029	neutral	Submission requests added definition of 'environmental compensation'. FFNZ would like to see further	neutral

			clarification of definition	
Horticulture New Zealand	00236.013	support	Highly productive land needs recognition for its importance to growing our food, feed, and fibre.	allow
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.017	oppose	Oppose amendment sought.	Disallow
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.016	Neutral	FFNZ would like to understand more how this impacts interpretation. Also further understand where the definition has come from.	netural
Fonterra Co – operative Group Limited	00213.006	support	Provides clarity	allow
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.019	neutral	“Restore” as a term needs further clarity. Dictionary definition means to bring something back to its former condition – which can be interpreted broadly.	neutral
Fonterra Co – operative Group Limited	00213.005	support	Provides clarity	allow
Fonterra Co – operative Group Limited	00213.007	support	Provides clarity	allow
Aurora Energy Limited	00315.013	support	Important to recognise the importance of communities that are isolated or that do not have alternative supply	allow
Waitaki Irrigators Collective Limited	00213.015	support	Provides clarity	allow
Beef & Lamb NZ and Deer Industry NZ	00237.008	support	Provides clarity	allow
Director- General of Conservation	00137.009	support	Need consistency in terminology	allow
Beef & Lamb NZ and Deer Industry NZ	00237.010	support	Support amendment.	allow
Director General of Conservation	00137.016	neutral	FFNZ have an interest in the definition of SNA	neutral

Queenstown Lakes District Council	00138.026	Neutral	Proposed definition is much broader. Ensure definition is consistent	neutral
Business South Inc	00408.007	neutral	FFNZ have an interest in how this would impact lake Onslow	neutral
Trojan Holdings	00206.010	support	Agree that there needs to be a definition of Natural Capital	allow
Ballance Agri-Nutrients	00409.012	support	Amend definition of natural wetland to align with MfE final version	allow
Te Ao Marama	00223.021	support	Support the need for clarity on definition of "over allocation"	allow
Beef & LambNZ and DeerIndustry NZ	00237.004	neutral	FFNZ have an interest in the definition of primary production	neutral
Fulton Hogan Limited	00322.002	support	Support amendment. Standard definitions provide clarity	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.014	neutral	FFNZ have an interest in this submission point.	neutral
Trojan Holdings Limited (Trojan)	00206.014	oppose	Rural production is the focus of rural areas, so should have its own term.	oppose
Silver FernFarms	00221.001	support	Support new definition of rural industry from national planning standards	allow
Beef & LambNZ and DeerIndustry NZ	00237.007	support	Support alignment of definition of significant Natural Area which is in line with the NPS for Indigenous Biodiversity	allow
Beef & LambNZ and DeerIndustry NZ	00237.005	support	Provide clarity on definition of waste	allow
Kāi Tahu kiOtago / Aukaha	00226.329	support	Map of native reserves would help provide clarity	allow
Kāi Tahu kiOtago / Aukaha	00226.033	oppose	The definition of primary production is the same as the National Planning Standards 2019 – and using standard	disallow

			definitions provides clarity.	
Kāi Tahu kiOtago / Aukaha	00226.040, 00226.044	Oppose	The obligation under the RMA is to take into account the principles of the Te Tiriti o Waitangi and it's not clear what additional relief or different outcome the submitter is seeking to achieve by referring to the articles of the Te Tiriti of Waitangi.	Oppose
OWRUG	00235.015	support	Aligns with FFNZ submission	allow
OWRUG	00235.016	support	Aligns with FFNZ submission	allow
Fonterra Co – operative Group Limited	00213.014	support	Provides clarity	allow
Kāi Tahu kiOtago / Aukaha	00226.049	neutral	Engagement with landowners critical to any process	neutral
Kāi Tahu kiOtago / Aukaha	00226.052	neutral	Clarity on what is meant by title change to “rakatirataka” – in terms of interpretation.	neutral
OWRUG	00235.017	support	Aligns with FFNZ submission	Allow
OWRUG	00235.018	support	Aligns with FFNZ submission	Allow
OWRUG	00235.019	support	Aligns with FFNZ submission	Allow
Minister for the Environment	00136.002	neutral	FFNZ have an interest in any discussion on 'over allocation'	neutral
OWRUG	00235.002	support	Aligns with FFNZ submission	Allow
OWRUG	00235.022		Aligns with FFNZ submission	Allow
Trojan Holdings Limited(Trojan)	00206.078	Oppose	Unclear about what is meant by “ensuring people can access and use the rural and natural environment”	disallow
Fonterra Co – operativeGroup Limited	00213.018	support	Importance of regionally significant industry to rural communities social and economic	Allow

			wellbeing – and the protection from reverse sensitivity	
Horticulture New Zealand	00236.029	support	Food production, security, and supply are all critical for rural communities.	allow
Horticulture New Zealand	00236.033	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	Allow
OWRUG	00235.058	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
Wayfare Group Ltd	00411.097	oppose	Unclear about what is meant by “ensuring people can access and use the rural and natural environment”	disallow
Horticulture New Zealand	00236.021	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
OWRUG	00235.021	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
OWRUG	00235.023	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	Allow
Raynoir Matarki Forests	00020.003	Neutral	FFNZ have an interest in primary production activities	neutral
Toitū Te Whenua, Land Information New Zealand	00101.004	Neutral	FFNZ have an interest in Otago’s high country – and its values	neutral
Director-General of Conservation	00137.033	support	Adds clarity to the context of what a natural hazard is.	allow
Dunedin City Council	00139.016	support	Adds clarity	allow
Horticulture New Zealand	00236.022	support	Food, fibre, and feed production are all key rural sector activities for the	allow

			region. Aligns with FFNZ submission	
Lauder Creek Farming	00406.001	support	Amend to include fire	Allow
OWRUG	00235.024	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
OWRUG	00235.025	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
OWRUG	00235.026	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
OWRUG	00235.027	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
Horticulture New Zealand	00236.023	support	Aligns with FFNZ submission	Allow
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.024	Oppose	Oppose proposed amendment	disallow
OWRUG	00235.028	support	Food and fibre production systems will need to be flexible to adapt to climate change. It is important to allow that capability for flexibility	Allow
OWRUG	00235.029	support	Food and fibre production systems will need to be flexible to adapt to climate change.	Allow
OWRUG	00235.030	Support	Supporting farm system diversification opportunities that could reduce emissions. Important allow the opportunity for these systems.	Allow

OWRUG	00235.031	Support	Aligns with FFNZ submission	Allow
Toitū Te Whenua, Land Information New Zealand	00101.009	support	Potential of increased climate induced urban drift – that will impact our food & fibre productive land	Allow
Waitaki District Council	00140.011	support	Support reference to carbon forestry as a resource management issue in Waitaki.	Allow
Beef & Lamb NZ and Deer Industry NZ	00237.009	support	Support reference to recognise and support work already being implemented by private landowners	Allow
Horticulture New Zealand	00236.024	Support	Aligns with FFNZ submission	Allow
New Zealand Pork Industry Board	00240.007	support	Aligns with FFNZ submission	Allow
OWRUG	00235.032	Support	Support inclusion of reference to Wallabies throughout SRMR-I3. They are an increasing risk for Otago.	Allow
OWRUG	00235.033	Support	Support inclusion of reference to Wallabies throughout SRMR-I3. They are an increasing risk for Otago.	support
OWRUG	00235.034	Support	Support proposed amendment	support
OWRUG	00235.036	Support	Aligns with FFNZ submission	Allow
Te Ao Marama	00223.042	Support	Support. Feral goats are an increasing issue in Central Otago	Allow
Toitū Te Whenua, Land Information New Zealand	00101.011	support	Adds clarity	Allow
Beef & Lamb NZ and Deer Industry NZ	00237.010	support	Aligns with FFNZ submission	Allow
Fonterra Co – operative Group Limited	00213.015	support	Aligns with FFNZ submission	Allow
Fonterra Co – operative Group Limited	00213.016	Support	Aligns with FFNZ submission	Allow
Fulton Hogan Limited	00322.005	support	Support. Provide clarity for use of term	Allow

			"primary production" or "rural production activities"	
Fulton Hogan Limited	00322.006	support	Retain reference to the direct and indirect (through reverse sensitivity effects) impact on land used for Primary Production within the economic 'Impact snapshot'	Allow
Horticulture NZ	00236.025	support	Support suggested amendments to context, and impact statement(s) environmental, sand social	Allow
OWRUG	00235.037	support	Support amendment to Impact Snapshot – economic, and the loss of productive land through reverse sensitivity, and the economic impact on food production, security, and food resilience.	Allow
Rural Contractors NZ	00410.002	support	Support. Highlights the flow on effect of reverse sensitivity on food and fibre production. Impact of reverse sensitivity on the economy of the wider rural sector.	Allow
Fire and Emergency New Zealand – Te Kei Region Otago Southland	00219.014	Support	Support proposed amendment	Allow
AWA	00502.001	oppose	Proposed amendment does not add clarity	oppose
Beef & Lamb NZ and Deer Industry NZ	00237.011	Support	Support proposed amendment	Allow
Central Otago Environmental Society	00202.003	Oppose	Amendment does not add clarity	disallow
Fonterra Co – operative Group Limited	00213.017	support	Support amendment to include rural industry	Allow
Horticulture New Zealand	00236.026	support	Aligns with FFNZ submission	Allow
Lauder Creek Farming	00406.002	support	Further clarity on flow regimes would help clarity	allow

New Zealand Pork Industry Board	00240.008	support	Amendments add clarity and perspectives on the importance of food production for the region	allow
OWRUG	00235.039	support	Aligns with FFNZ submission	Allow
OWRUG	00235.040	support	Food, fibre, and feed production are all key rural sector activities for the region. Aligns with FFNZ submission	allow
OWRUG	00235.041	support	Food, fibre, and feed production are all key rural sector activities for the region – and rural communities are reliant on the sector for their wellbeing. Aligns with FFNZ submission	allow
OWRUG	00235.042	support	Amendment adds clarity	allow
Waitaki District Council	00140.013	support	Definition of what a 'water-short catchment' is would provide clarity.	allow
Waitaki Irrigators Collective Limited	00213.003	support	Amendment provides future considerations perspective	allow
Wayfare Group Ltd	00411.106	oppose	It is not clear what 'non-exclusive' means. The wellbeing of 'economic, social, cultural, and environmental' are all critical to include	disallow
Beef & Lamb NZ and Deer Industry NZ	00237.012	support	Aligns with FFNZ submission	allow
Central Otago Environmental Society	00202.004, 00202.005	Oppose	Oppose proposed amendment	disallow
Central Otago Environmental Society	00202.006	oppose	Landowner feedback from the Manuherekia area have data to show that efficient farm systems and operations are improving water quality	disallow

Central Otago Environmental Society	00202.007	oppose	Poorly managed land-use and population growth impact water quality	disallow
Horticulture New Zealand	00236.027	Support	Aligns with FFNZ submission.	allow
OWRUG	00235.043	support	Support inclusion of aquatic pest species	allow
OWRUG	00235.044	support	Aligns with FFNZ submission.	allow
OWRUG	00235.045	support	Aligns with FFNZ submission	allow
OWRUG	00235.047	support	Thriving rural communities are supported by the use of good quality water for food and fibre production	allow
Toitū Te Whenua, Land Information New Zealand	00101.017	oppose	Unclear what specific agricultural activities are meant	disallow
Toitū Te Whenua, Land Information New Zealand	00101.018	Neutral	Unclear what is meant by “the value which water polluting activities contribute to the Otago economy”. Is this value in terms of GDP to economy?	neutral
Horticulture New Zealand	00236.028	support	The impact of pests and predators on food (supply, security, and production) is an important consideration.	allow
OWRUG	00235.048	support	Some land management practices are enabling indigenous species. So any changes do need to be carefully thought through.	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.026	oppose	The amendment does not add clarity	disallow
Wayfare Group Ltd	00411.115	neutral	Other parties have used different terminology. Clarity would be useful.	neutral
Toitū Te Whenua, Land Information New Zealand	00101.019	neutral	Clarity on the wider context surrounding biodiversity loss, and/or the need to	neutral

			enhance/restore biodiversity.	
Beef & Lamb NZ and Deer Industry NZ	00237.014	support	Retain as notified	allow
Beef & Lamb NZ and Deer Industry NZ	00237.015	support	Retain as notified	allow
Central Otago Environmental Society	00202.008	oppose	Water abstraction also includes urban usage not just irrigation – so should be left broad.	disallow
Beef & Lamb NZ and Deer Industry NZ	00237.016	support	Support amendments sought	allow
OWRUG	00235.056	support	Provides clarity	allow
OWRUG	00235.057	support	Provides clarity	allow
Fonterra Co – operative Group Limited	00213.022	support	Support amendments sought	allow
Fulton Hogan Limited	00322.008	support	Support activities that allow rural communities to recover from adverse effects of natural hazards and climate change	allow
Wise Response Society Inc	00509.032	Oppose	Amendment does not provide clarity	disallow
Wise Response Society Inc	00509.046	Oppose	Oppose new amendment	disallow
OWRUG	00235.061	support	Retain as notified	allow
OWRUG	00235.062	support	Support amendments sought	allow
Horticulture New Zealand	00236.035	support	Support amendments sought	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.032	oppose	Oppose amendment sought. Does not add clarity	disallow
Horticulture New Zealand	00236.036	support	Support amendments sought	allow
Otago Fish & Game Council and the Central South Island	00231.034	oppose	Oppose amendments sought.	disallow
OWRUG	00235.065	Support	Amendment adds clarity	allow

University of Otago	00127.002	support	Support amendment sought	allow
Kāi Tahu ki Otago / Aukaha	00226.095	support	Retain as notified	allow
Beef & Lamb NZ and Deer Industry NZ	00237.021	support	Support amendment sought	allow
OWRUG	00235.067	Support	Support amendment sought. Helps provide rural communities with short, medium and long term measures.	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.035	neutral	Unclear what is meant by ecological migration	neutral
OWRUG	00235.068	Support	Amendment is supported	allow
Horticulture New Zealand	00236.038	support	Support amendments sought	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.036	Oppose	Oppose amendment sought	disallow
WAI Wanaka	00222.019	support	Support amendment sought. "Collaborate" is a more integrated management approach than "consultation" - that would work better with communities.	allow
New Zealand Infrastructure Commission	00321.020	support	Retain as notified	allow
Horticulture New Zealand	00236.041	support	Support amendments sought.	allow
Horticulture New Zealand	00236.047	support	Support amendments sought.	allow
Fonterra Co – operative Group Limited	00213.024	Support	Retain as notified	allow
Horticulture New Zealand	00236.042	Support	Support amendments sought	allow
Horticulture New Zealand	00236.045	support	Support amendments sought	allow
Horticulture New Zealand	00236.048	support	Support amendments sought	allow
Horticulture New Zealand	00236.052	support	Support amendments sought	allow

Horticulture New Zealand	00236.055	support	Support amendments sought	allow
Beef & Lamb NZ and Deer Industry NZ	00237.024	support	Support amendments sought	allow
OWRUG	00235.003	support	Support amendments sought. A framework for setting timeframes would help add clarity.	allow
Skinner, Evelyn	00317.002, 00317.003, 00317.004, 00317.005, 00317.006	oppose	Oppose the relief sought	disallow
Greenpeace Aotearoa	00407.001, 00407.002, 00407.005, 00407.006, 00407.007	oppose	Oppose the relief sought	disallow
OWRUG	00235.086	Support	Support amendments sought	support
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.047, 00231.05, 00231.056, 00231.057, 00231.058, 00231.059, 00231.06, 00231.07, 00231.075, 00231.079, 00231.074, 00231.076, 00231.077, 00231.08, 00231.093	Oppose	Oppose the amendment sought. Introduced species (trout and salmon) that predate on native freshwater species should not be given the same protection as native species.	disallow
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.065	oppose	Oppose the amendment requested. Using the term "avoid" to "encourage landowners" does not add clarity.	disallow
OWRUG	00235.082	Support	Support amendments sought. Aligns with FFNZ submission	allow
OWRUG	00235.083	support	Support amendments sought. Aligns with FFNZ submission	allow
OWRUG	00235.084	support	Support amendments sought. Aligns with FFNZ submission	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.078	oppose	Oppose amendment sought. There is a process to achieve these sorts of goals under the NPSFM. Community	disallow

			engagement is critical.	
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.05	oppose	Oppose amendment sought. There is a process to achieve these sorts of goals under the NPSFM. Community engagement is critical.	disallow
Sole Matthew	00508.008	oppose	Oppose amendment sought. There is a process to achieve these sorts of goals under the NPSFM. Community engagement is critical.	disallow
Manuherekia Catchment Group	00116.003	support	Support amendments sought	allow
Moutere Station	00026.004, 00026.005	support	Support amendments sought	allow
OWRUG	00235.087	Support	Support amendments sought. Water storage is fundamental to the food and fibre sector	allow
Skinner, Evelyn	00317.001	oppose	Oppose amendments sought. The later date of 2050 is more appropriate.	disallow
Kāi Tahu ki Otago / Aukaha	00226.170	Oppose in part	We would suggest redrafting of (Y) so only artificial modifications are captured.	Disallow in part
Beef & Lamb NZ and Deer Industry NZ	00237.028	support	Support amendments sought. Clarity would be helpful	allow
Beef & Lamb NZ and Deer Industry NZ	00237.030	support	Support amendments sought.	allow
OWRUG	00235.089	support	Support amendments sought. Catchment groups in Otago are a key part of achieving these goals.	allow
Greenpeace Aotearoa	00407.034	oppose	Oppose amendments sought. Needs to align more with the requirements of the NPSFM	disallow
Director-General of Conservation	00137.081	support	Support amendment sought. Monitoring	allow

			and collection of robust data that is published as reports would be useful.	
OWRUG	00235.097	Support	Support amendments sought	allow
Trojan Holdings Limited (Trojan)	00206.032	Oppose	Oppose amendment sought. Access to natural wetlands on private land would need engagement with landowners	disallow
Wayfare Group Ltd	00411.044	oppose	Oppose amendment sought. Access to natural wetlands on private land would need engagement with landowners	disallow
OWRUG	00235.093	support	Support amendments sought	allow
Horticulture New Zealand	00236.063	Support	Support amendments proposed. Aligns with FFNZ submission	allow
Beef & Lamb NZ and Deer Industry NZ	00237.034	support	Support amendments proposed	allow
Beef & Lamb NZ and Deer Industry NZ	00237.035	Support	Support amendments proposed	allow
Highton, John	00014.055, 00014.056,	support	Support amendments proposed	allow
Beef & Lamb NZ and Deer Industry NZ	00237.040	support	Support amendments proposed	allow
Ravensdown Limited	00121.058	support	Support amendments proposed	allow
Fonterra Co operative Group Limited	00213.036	support	Support amendments proposed	allow
Beef & Lamb NZ and Deer Industry NZ	00237.042	support	Support amendments proposed	allow
Beef & Lamb NZ and Deer Industry NZ	00237.043	support	Support amendments proposed	allow
Beef & Lamb NZ and Deer Industry NZ	00237.044	support	Support amendments proposed	allow
Beef & Lamb NZ and Deer Industry NZ	00237.045	Support in part	Support proposal to align subchapter with NPS-HPL	allow
Otago Fish & Game Council and the Central	00231.064, 00231.065	oppose	Oppose proposed amendments	disallow

South Island Fish & Game Council				
Beef & Lamb NZ and Deer Industry NZ	00237.047	support	Support proposed amendments. Aligns with FFNZ submission. Inclusion of animal welfare considerations is important.	allow
OWRUG	00235.110	support	Support proposed amendments.	allow
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.066	oppose	Oppose proposed amendments	disallow
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.067	oppose	Oppose proposed amendments	disallow
Greenpeace Aotearoa	00407.051	oppose	Oppose proposed amendments	disallow
OWRUG	00235.112	support	Support proposed amendments	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.103	oppose	Oppose proposed amendment. FFNZ had requested deletion of ECO-P6	disallow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.104	oppose	Oppose proposed amendment	disallow
Wayfare Group Ltd	00411.137	Support	For reasons outlined by the submitter	Allowed
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.095	Oppose	The relief sought has potential to capture more sites than anticipated by the proposed criteria. We wish to remain involved as this matter progresses.	Disallowed
Heritage New Zealand Pouhere Taonga	00123.003	Oppose	It is unclear what the relief sought achieves above and beyond the notified provisions. We are concerned it may capture more places or areas than anticipated by the proposed criteria and wish to remain	Disallowed

			involved as this matter progresses.	
Waitaki Whitestone Geopark Trust	00117.007	Oppose	The relief sought has potential to capture more sites than anticipated by the proposed criteria. We wish to remain involved as this matter progresses.	Disallowed
Waitaki Whitestone Geopark Trust	00117.008	Oppose	The relief sought has potential to capture more sites than anticipated by the proposed criteria. We wish to remain involved as this matter progresses.	Disallowed
Horticulture New Zealand	00236.104	Support	For reasons outlined by the submitter	Allowed
Horticulture New Zealand	00236.103	Support	For reasons outlined by the submitter	Allowed
Contact Energy Ltd	318.024	Oppose	Renewable electricity generation should be recognised and provided for – not 'protected.'	disallow
Trustpower Ltd	311.031	Oppose	Renewable electricity generation should be recognised and provided for – not 'protected.'	disallow
Contact Energy Ltd	318.025	Oppose	Renewable electricity generation should be recognised and provided for – not 'protected.'	disallow
Trustpower Ltd	311.033	Oppose	Renewable electricity generation should be recognised and provided for – not 'protected.'	disallow
Contact Energy Ltd	318.026	Oppose	Renewable electricity generation should be recognised and provided for – not 'protected.' There needs to also be recognition of other users of water.	disallow
Trustpower Ltd	311.038	Oppose	Changing the policy from 'minimising' to 'avoid' does not	disallow

			provide for recognition of other users of water.	
Trustpower Ltd	311.040	Oppose	Oppose proposed submission. Needs to be some recognition of the need of other activities.	disallow
Trustpower Ltd	311.041	Oppose	Oppose	disallow
Aurora Energy Ltd	315.012	Oppose	The submitter seeks to replace all instances of the term 'electricity transmission network' with 'distribution network'. The two networks are very different and the implications of changing the terms unilaterally could be significant. Clarity is required.	Disallow
PowerNet Ltd	511.033	Oppose	The submitter seeks that the distribution network is 'protected' from other activities. Protection is a very high threshold which doesn't even apply to the National Grid in the NPSET.	Disallow
Transpower NZ Ltd	314.038	Oppose in part	The list of matters in 5 should include 'highly productive land' as a matter of consideration to avoid adverse effects.	If the submission is accepted include highly productive land in clause 5).
Transpower NZ Ltd	314.035	Support	Rewording of the objective to focus specifically on the National Grid is clearer and gives effect to the NPSET.	Accept submission
Aurora Energy Ltd	315.046	Support	The addition of 'functional and operational' needs provides greater clarity in the policy.	allow
Aurora Energy Ltd	315.053	Oppose	FFNZ does not support significant electricity distribution infrastructure being classed as regionally	disallow

			significant infrastructure.	
Infrastructure Commission	321.059	Oppose	A policy of 'avoid' or 'seek to avoid' does not recognise that other activities need to also be provided for.	disallow
Queenstown Airport Corp	313.022	Oppose	The submitter seeks a policy to protect nationally and regionally significant infrastructure from the establishment of other activities. Such a policy would prioritise such infrastructure over all other activities which is not the intent of the RMA. The Operative RPS seeks that infrastructure is managed and developed in a sustainable way and nationally and regionally significant infrastructure is recognised and provided for.	disallow
Transpower NZ Ltd	314.036	Oppose	A policy of 'avoid' does not recognise that other activities need to also be provided for. This is inconsistent with the wording sought for EIT-INF-O6 by the submitter which sought that adverse effects on the National Grid are managed.	disallow
Aurora Energy Ltd	315.054	Support in part	The proposed policy is confusing as to what it applies to. Both the distribution operators and Transpower seek that the policy is reworded to clarify its purpose.	Accept the submission to clarify the intent of the policy.
Transpower NZ Ltd	314.037	Support in part	The proposed policy is confusing as to what it applies to.	Accept the submission to

			Both the distribution operators and Transpower seek that the policy is reworded to clarify its purpose. If a separate policy is to be included for the National Grid the wording sought by the submitter is appropriate.	clarify the intent of the policy.
Aurora Energy Ltd	315.058	Oppose in part	Policy 4.4.5 of the Operative RPS requires that effects of potentially incompatible activities on significant electricity distribution infrastructure are managed through methods such as corridors. The submitter seeks that such activities shall generally not be allowed in the corridor, which is inconsistent with 4.4.5 and a policy of 'managing'.	If the submission is accepted ensure that the wording is consistent with Policy 4.4.5 of the Operative RPS.
Network Waitaki Ltd	320.026	Oppose in part	Policy 4.4.5 of the Operative RPS requires that effects of potentially incompatible activities on significant electricity distribution infrastructure are managed through methods such as corridors. The submitter seeks that such activities shall generally not be allowed in the corridor, which is inconsistent with 4.4.5 and a policy of 'managing'.	If the submission is accepted ensure that the wording is consistent with Policy 4.4.5 of the Operative RPS.
PowerNet Ltd	511.026	Oppose in part	Policy 4.4.5 of the Operative RPS requires that effects of potentially incompatible activities on significant electricity	If the submission is accepted ensure that the wording is consistent with Policy 4.4.5 of

			distribution infrastructure are managed through methods such as corridors. The submitter seeks that such activities shall generally not be allowed in the corridor, which is inconsistent with 4.4.5 and a policy of 'managing'.	the Operative RPS.
Transpower NZ Ltd	314.040	Oppose in part	This is inconsistent with Policy 10 of the NPSET which seeks that activities be managed to the extent reasonably possible to avoid reverse sensitivity effects.	Oppose in part
Transpower NZ Ltd	314.042	Oppose	FFNZ has sought rewording of AER7	disallow
Central Otago District Council (CODC)	00201.031	support	Support an integrated network for the region that connects rural communities and is resilient in terms of natural hazard risks	allow
Fire and Emergency New Zealand – Te Kei Region Otago Southland	00219.009	support	Support proposed amendments.	allow
Beef & Lamb NZ and Deer Industry NZ	00237.056	Support	Support proposed amendments. Aligns with FFNZ submission	allow
Horticulture New Zealand	00236.087	support	Support proposed amendments. Aligns with FFNZ submission	allow
OWRUG	00235.129, 00235.130	support	Support proposed amendments.	allow
Ravensdown Limited	00121.086	support	Support proposed amendments.	allow
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.140	Oppose	Oppose proposed amendment. Wording differences between definition and NPSFM does not provide clarity.	disallow
Kāi Tahu ki Otago / Aukaha	00226.022, 00226.075, 00226.079, 00226.077	neutral	FFNZ have an interest in this. Once sites and values are identified, helping	neutral

			landowners understand what is on their property (and significance) would provide clarity.	
Te Ao Marama	00223.006, 00223.121, 00223.120	neutral	FFNZ have an interest in this. Further clarification with the pORPS provisions regarding the terms cultural landscapes and wahi tupuna would provide clarity for landowners. Once sites and values are identified, helping landowners understand what is on their property (and significance) would provide clarity.	neutral
OWRUG	00235.148	Support	The relief sought is consistent with FFNZ submission	Allowed
OWRUG	00235.149	Support	For reasons outlined by the submitter	Allowed

