

From: [Christine Rose](#)
To: [RPS](#)
Subject: Further submissions to pORPS
Date: Friday, 12 November 2021 2:38:59 p.m.
Attachments: [Cover letter pORPS.doc](#)
[further submissions pORPS Greenpeace Aotearoa.docx](#)

Kia ora,
Please find attached, further submission from Greenpeace Aotearoa to submissions on the proposed Otago Regional Policy Statement.
Attached are - cover letter, Form 6 and our further submissions.
Thanks very much,
Kind regards
Christine

Christine Rose
Senior Agriculture Campaigner
Greenpeace Aotearoa
Phone +64-21-0563784
www.greenpeace.org/aotearoa/

When we stand together, we win.



Our mission is to ensure the ability of the earth to nurture life in all its diversity.

Greenpeace uses peaceful protest and creative confrontation to expose global environmental problems and promote solutions that are essential to a green and peaceful future. It comprises 26 independent national/regional offices in over 55 countries, as well as a co-ordinating body, Greenpeace International.

To maintain its independence, Greenpeace does not accept donations from governments or corporations but relies on [contributions from individual people](#) and foundation grants.

Greenpeace Aotearoa
11 Akiraho St
Mt Eden
Auckland

10 November 2021

To whom it may concern,

Please find attached, further submissions to the draft Otago Regional Policy Statement from Greenpeace Aotearoa.

Our particular interests are in declining biodiversity and climate change, especially as caused by intensive agriculture which is polluting freshwater, contaminating drinking water and contributing to climate change.

For the interests of preserving biodiversity and the life supporting capacity of soil, water and the climate, we seek the relief and support or oppose the submissions attached.

Thanks very much,

Yours sincerely,
Christine Rose

Lead agriculture campaigner
Greenpeace Aotearoa

GREENPEACE

Proposed Otago Regional Policy Statement 2021

Further Submissions

Information for Submitters

Further Submissions must be in the prescribed form (Form 6) specified by the Resource Management (Forms, Fees, and Procedure) Regulations 2003 and must be received by Otago Regional Council **by 5pm Friday 12 November 2021**

Privacy: Be aware that **all further 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 6 is provided below. Once completed, please provide to ORC **by 5pm Friday 12 November 2021** by one of the following:

Email: rps@orc.govt.nz Further Submissions in MS Word (eg docx) are preferred.

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

Hand Delivery at

Dunedin: Otago Regional Council Office, Philip Laing House, Level 2, 144 Rattray Street, Dunedin 9016, Att: Otago Regional Council Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: Otago Regional Council Policy Team

A copy of your further submission must also be served on the original submitter within 5 working days after it is served on the local authority.

Submitter Address for Service details are provided in the Summary of Decisions Requested report.

INQUIRIES

Email: rps@orc.govt.nz

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

Note to person making further submission

Please note that your further 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 further 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.

These two pages are for information and are not part of the Form and can be deleted when submitting to ORC and Original Submitters.

Further Submission Form 6 commences on the next page.

Form 6

Further submission in support of, or in opposition to, submission on notified proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 5pm on Friday 12 November 2021, and by original submitters within 5 working days of service on ORC)

To: Otago Regional Council

1. Name of person making further submission

Greenpeace Aotearoa

2. This is a further submission in support of (or in opposition to) a submission on the **Proposed Otago Regional Policy Statement 2021**.

3. I am (tick whichever applies and add grounds if required):

<input checked="" type="checkbox"/>	A person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category; or
<input type="checkbox"/>	a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category; or
Grounds:	Greenpeace Aotearoa represents the public interest in healthy fresh water, drinking water that is free from nitrate and other contamination, and a climate that is stable and safe for people and other life
<input type="checkbox"/>	the local authority for the relevant area.

4. I ~~wish/do not wish~~ (Select one) to be heard in support of my further submission.

5. If others make a similar submission, I ~~will~~/~~will not~~ (Select one) consider presenting a joint case with them at a hearing.

6. Further Submitter Details

a. Signature of person making further submission

(or person authorised to sign on behalf of submitter. A signature is NOT required if you make your submission by electronic means).

Christine Rose

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 Christine Rose

Position Lead agriculture campaigner

Organisation Greenpeace Aotearoa

c. Date

11/11/21

Address for service of person making further submission *(This is where all correspondence will be directed)*

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

Christine Rose, lead agriculture campaigner, Greenpeace Aotearoa

e. Email: *(this is our preferred means of contact)*

crose@greenpeace.org

f. Telephone:

0210563784

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

11 Akiraho Street, Mount Eden, Auckland 1024

7. My further submission is:

Greenpeace Aotearoa – further submissions to the Proposed Otago Regional Policy Statement

Key: Existing policies are in black, submitter's proposed policies are in red if we support them, or red and struck through if we request their deletion. Our additions are in green.

Submitter	Policy	Our position	Details & relief sought
Aotearoa Water Action – Niki Gladding 00502	LF Wai P4 & 5 new policies	Support Adopt recommended additons	LF-WAI-P(4) fourth, the activities in (3) that deliver the best outcomes for the environment and local communities, as determined through consultation with iwi, mana whenua and local communities. LF-WAI-P(5) fifth, the taking and use of water for water export will be a prohibited activity
	LF-WAI-P3(x)	Support Adopt recommended additions	(8) Protects the structural integrity and capacity of aquifers
	LF-WAIAERX	Support Adopt recommended additions	Fresh water is allocated within limits in a way that gives effect to te Mana o te Wai, and supports the cultural, social and economic wellbeing of mana whenua and local communities

	LF-FW-08	Support Adopt recommended additions	(6) the taking and use of the wai supports cultural, social and economic wellbeing and drives better environmental outcomes including reduced GHG emissions in line with regional targets
	LF-FW-P7(6)	Support Adopt recommended additions Agree with the submitter's explanation of the need for a definition of efficiency – 'There is a tendency when assessing applications for the take and use of water to consider only technical efficiency i.e. whether water will be wasted. Rarely do consenting authorities consider opportunity costs or non-monetary value when assessing whether a particular use of water is efficient. But economic efficiency is not the same as financial efficiency. Economic efficiency is concerned with all goods and services valued by the public regardless of whether consumption is accompanied by monetary exchange. Therefore, the ORC must direct its Regional Plan to understand which uses of water can deliver the best overall value to its communities. It would be inefficient to enable activities that do not	Efficiency in relation to the use of water includes economic, technical, and dynamic efficiency, where 'economic efficiency' means maximizing the value (including non- monetary value) to communities from the use of water, including reduced GHG emissions.

		contribute to reducing GHG emissions.'	
	LF-FW-M6	Support, adopt submitter's suggestion We support the submitter's reasoning - the rules should ensure scarce water is allocated to economic activities that deliver the most environmental, social and cultural value	LF-FW-M6(X) include rules to <u>allocate water within limits amongst competing activities to ensure the most efficient use of water (noting that economic efficiency should be clearly defined as maximizing the value</u> (including nonmonetary value) to communities from the use of water
	LF-FW-AERX	Support Submitter's suggestion adds clarity on Te Mana o te Wai	<u>Fresh water is allocated within limits in a way that will give effect to te Mana o te Wai, and that will deliver a balance of good social, cultural and environmental outcomes, including reduced GHG emissions.</u>
Ballance Agri-nutrients 0409	LF-LS p20 (4) – Land use change	Support in part	Add to BAN's proposed new words, reference to synthetic nitrogen fertiliser: Promote changes in land use or land management practices that improve: (1) the sustainability and efficiency of water use, (2) resilience to the impacts of climate change, or (3) the health and quality of soil. (4) the quality of surface/or groundwater through the management of diffuse discharges of sediment, or other contaminants, such as synthetic nitrogen fertiliser.

	LF-LS-P21 – Land use and fresh water	Oppose or amend. Delete ‘where practicable’ as this is meaningless and unenforceable Add ‘synthetic nitrogen fertiliser’ for clarity	(1) reducing direct and indirect discharges of contaminants such as synthetic nitrogen fertiliser to surface and ground water from the use and development of land, where practicable
Beef + Lamb NZ Ltd 0237	SRMR-I6	Oppose	Reject Beef+Lamb NZ Ltd’s request to ‘Delete specific reference to stock access and winter grazing from the Environmental Impact Snapshot.
	LF-VM-O2 (7)(b)(ii) and (iii)	Oppose, reject suggested amendments Water needs to be safe and free from contaminants, not just those that are harmful to human contact.	Amend subsection (ii) as follows: ...discharges of nutrients and other contaminants to waterbodies where necessary to ensure so that they are safe for human contact,... Amend subsection (iii) as follows: ...discharges of nutrients and other contaminants to waterbodies where necessary to ensure so that they are safe for human contact
	LF-VM-O3 (5) Amend section (5)	Oppose – reject suggested amendments. Land use and management can have detrimental effects so are an appropriate area of focus Retain ‘faecal contamination’ and add ‘including nitrate contamination’	to: - focus on a freshwater goal rather than land management practices e.g., ‘more waterbodies are safe for human contact more often’ – focus on main contaminant of concern rather than nutrients, e.g., including nitrate and faecal contamination from animals is avoided ‘faecal contamination of waterbodies is reduced so that

			more waterbodies are suitable for human contact more often' - focus on overall reduction in sources of contamination rather than all land management
Central Otago Environment Society 0202	SRMR-I5	Support proposed rewording	Freshwater demand exceeds ecological capacity in some places In water-short catchments ecological capacity may not allow demand for consumptive uses to be met.
	SRMR-I6	Support and add wording Agricultural contamination of water is a significant issue, including sedimentation and nitrate pollution	7 th paragraph urban development is mentioned as a major generator of sediment into lakes and rivers in Central Otago and yet this source will be minor compared to sediment from intensive agriculture which is not mentioned. Sediment and fertiliser-related contamination such as nitrate from agriculture should therefore be mentioned in this paragraph.
	SRMR-I11	Support Nitrate contamination can take several years to travel through aquifers and other water bodies so a precautionary approach is recommended	A statement should be included that states faced with insufficient knowledge and understanding a precautionary approach should be taken when making decisions or setting policy around natural resource management
	IM-04 - Climate change:	Support Agriculture is the main industry causing climate change emissions in NZ so policies should recognise this.	This objective is an inadequate response to the most significant threat to the region. The objective should be to support the national objectives for climate change by

			reforming the economy including phasing out synthetic nitrogen fertiliser and lowering cow numbers, and the pattern of settlement in Otago so that we are able to reach zero net carbon emissions by 2050.
	IMP-10 - Climate change adaptation and mitigation:	Support	A policy should be included requiring councils to consider ways for reducing carbon emissions and achieving energy efficiency in all their planning documents. These methods should include phasing out synthetic nitrogen fertiliser and lowering cow numbers,
	IM-M1- Regional and district plans:	Support	Regional and district councils should be required to include in their plans policies and methods for reducing climate changing emissions, including phasing out synthetic nitrogen fertiliser and lowering cow numbers,
	LF-WAI-P3 Integrated management:	Support	A clause should be added to the effect; Avoid the adverse effects of certain land uses by preventing or controlling land use changes or activities such as conversion to dairying on unsuitable soils close to vulnerable rivers and streams.
	LF-VM-02-Clutha Mata-au FMU vision: (7)(b)(ii)	Support Add nitrate for clarity and precision	Reword to the effect: The ecological function of all water bodies is protected and restored where degraded supported by innovative

			and sustainable land and water management practices which reduce discharges of nutrients and other contaminants such as nitrate to water bodies so they are safe for human contact,
	LF-VM-04 Taieri FMU vision - (8)	Support	Reword to the effect: “The ecological function of all water bodies is protected and restored where degraded supported by innovative and sustainable land and water management practices which reduce discharges of nutrients such as nitrate and other contaminants to water bodies so they are safe for human contact and consumption.
	LF-VM-P6 Relationship between FMU’s and rohe (2)	Support Self regulation is ineffective as shown by declining fresh and drinking water quality. Regulation to manage synthetic nitrogen fertiliser application and nitrate contamination are essential	Additional environmental outcomes should be set for the Manuherikia rohe. (3) Limits and action plans to achieve environmental outcomes should be established for the Manuherikia rohe. Explanation: The community surrounding the Manuherikia has been dominated by farming interests and consequently a non-regulatory approach will not work on its own. The community need to be supported by a regulatory framework of bottom lines in which to develop environmental outcomes and actions.

	LF-FW-08-Fresh water	Support	The objective is inadequate and needs to include reference to maintaining healthy ecological function and the natural character of all water bodies and not just its “outstanding water bodies”
	LF-LS-P21	Support As the submission states, ‘It is not possible to reduce indirect discharges of contaminants to water for some uses on some soil types such as dairying on alluvial soils adjacent to the Manuherikia. In these cases controls are required on such activities as intensive dairying and winter feeding forage crops.’	Land use and fresh water Include a clause to the effect: Manage land uses that have an adverse effect on water quality that cannot be effectively managed through mitigation measures.
Environmental Justice Ōtepoti 0203		Support in full	
Federated Farmers of NZ 0239	Part 1, p5	Oppose	Reject suggestions from FFNZ in full
	Pg 6	Oppose – submitter is concerned about over-focus on tourism and supports more focus on agriculture. This is unnecessary. Alternative relief is to trim discussion on tourism, or to discuss some of the resource management and environmental problems with agriculture as well (water use, nitrate contamination, climate change, sediment loss and soil damage)	Submitter wants more discussion on agriculture
	IM-M5 – Other methods	Oppose Addressing the causes of climate change are the first priority. And for this pRPS, Te Mana o Te Wai is the	Enable appropriate water storage solutions to mitigate the effects of climate change

		essential consideration, putting the health of water bodies first. That means not giving free licence to water storage through policy, where that might facilitate further land and water use that leads to more climate change, such as industrial agriculture does.	
	LF-WAI-O1 – Te Mana o te Wai	Oppose Submitter suggests changes which subvert the Te Mana o te Wai heirarchy. Retain the existing wording	The mauri of Otago's significant and highly valued natural resources are identified and protected, or enhanced where water bodies and their health and well-being is protected, and restored where it is degraded , and the management of land and water recognises and reflects that restores the balance between water, the wider environment, and the community, by recognising that:
	LF-FW-P10 – Stock exclusion	Oppose There are good environmental reasons for excluding all stock from wetlands. Retain the existing wording	the exclusion of stock as per the Resource Management (Stock Exclusion) Regulations 2020.
Forest and Bird Protection Society 0230	SRMR-I2 – Climate change	Accept Proposed words are a more accurate reflection of impact of climate change	Climate change is likely to will impact our economy and environment
	SRMR-I6 –Water Quality	Support – accurately reflects environmental conditions	Declining water quality
	SRMR-I7 - biodiversity	Support – accurately reflects environmental conditions	Rich and varied biodiversity

			Inland Otago has degraded native fish communities, due to degraded water quality from pollution from land use change and discharges, over abstracted water bodies, the presence of the Clutha dams and their effects on eel populations and trout predation on native galaxiids.
	IM-P4 – Strategic management	Support Precautionary principle is prudent given long time for some effects to be manifest	Setting a strategic approach to ecosystem management, and (5) measures cumulative effects on the environment and requires their proactive management, including by taking a precautionary approach when considering effects of activities."
	LF-WAI-P3 – Integrated management/ki uta ki tai	Support Recognises environmental effects of activities related to current conditions, and Te Mana o te Wai	8. Considers effects against the naturalised flow and natural state of a waterbody when making decisions on flow, allocation, standards for water quality, and activities which may affect the health, wellbeing, and resilience of water bodies and freshwater ecosystems.
	LF-VM-O1 – Otago wide vision	Support – appropriately reflects Te Mana o te Wai	By no later than 2040, in all Otago catchments: (1) water bodies are protected at, or restored to a state of good health, wellbeing and resilience, (2) activities relating to water support the health, well-being and resilience of affected water bodies, (3) the natural form

			<p>and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour, (4) ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored, (5) wetland, estuary and lagoon extent has been restored as much as practical where it has been lost, and their quality is protected and restored, (6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments, (7) food is available to be harvested from water bodies in abundance and is safe to consume, (8) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies, (9) there are no direct discharges of waste water to water bodies, and (10) fresh water is managed in accordance with the LF-WAI objectives and policies.</p> <p>Make the required consequential amendments to specific FMU visions in LFVM-O2 to LF-VM-O6 to ensure the overarching vision above applies</p>
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			to all of them while retaining FMU specific provisions and timeframes where appropriate to be stronger than provided for in LF-VM-O1.
	LF-FW-O10 - Wetlands	Support – recognises and provides for endangered ecosystem preservation	Wetlands definition
Otago Fish and Game Council 0231	Define minimise	Support for clarity	Minimise means to reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.
	Define precautionary approach	Support for clarity	Precautionary approach means an approach that: (a) avoids not acting due to uncertainty about the quality of quantity of the information available, and (b) interprets uncertain information in a way that best supports the health, wellbeing and resilience of the natural environment
	SRMR-12	Support – Note that responses to climate change may have adverse effects that should be considered, balanced, and avoided, remedied or mitigated	Human adaptation to climate change, such as building or expanding dams or flood protection schemes, may impose adverse impacts upon ecosystems in addition to those imposed by climate change itself.
	SRMR-17	Support, with additions as noted	anthropogenic alteration of waterways, such as damming, abstraction, bed manipulation, draining wetlands and the discharge of contaminants, such as

			agricultural runoff including sediment, nutrients and nitrate from intensive dairying
	IM-P2	Support for clarity	(1) firstly, secure the long-term health, well-being, resilience and mauri of the natural environment,
	IM-P4	Support for guidance applying the Plan and applying Te Mana o te Wai	(5) measures cumulative effects on the environment and requires their proactive management, and (6) Identifies and implements environmental limits in at least the following matters: (a) air, (b) coastal waters, (c) estuaries, (d) freshwater, (e) wetlands, and (f) soil.
	LF-WAI-P3	Support – these values can be compromised by contamination from land use practices such as intensive dairying and too many cows, including synthetic nitrogen fertiliser	(9) preferentially considers effects against the naturalised flow and unpolluted state of a water body when making flow and quality decisions about the health, wellbeing and resilience of water bodies and freshwater ecosystems, including when setting limits or environmental outcomes, and (10) requiring all activities affecting water bodies to support the health, well-being and resilience of relevant water bodies and associated freshwater ecosystems. (11) Recognise and sustain the amenity and recreation values that people and communities derive from water bodies and their sources, including

			recreation in and around water and harvest food from water.
	LF-VM-O2 to LF-VM-O6 – All of Otago catchment vision	Support to add rigour and direction to the Plan These values can all be impacted by intensive dairying and its inputs, as above	By no later than 2040, in all Otago catchments: (1) water bodies are protected at, or returned to a state of good health, wellbeing and resilience, (2) activities relating to water support the health, well-being and resilience of affected water bodies, (3) the natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour, (4) ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored, (5) wetland, estuary and lagoon extent has been restored as much as practical where it has been lost, and their quality is protected and restored, (6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments, (7) the habitat of trout and salmon is protected and restored, and trout and salmon are able to migrate easily within and between catchments, insofar as each goal is consistent with that of indigenous species, (8) food is

			available to be harvested from water bodies in abundance and is safe to consume, (9) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies, (10) there are no direct discharges of waste water to water bodies, and (11) fresh water is managed in accordance with the LF-WAI objectives and policies.
	LF-FW-P7	Support for clarity and consistency with Te Mana o te Wai	(1b) all activities related to freshwater support the health, well-being and resilience of water bodies,
	LF-LS-P20	Support. These values can be adversely effected by land use practices such as intensive dairy and its inputs such as synthetic nitrogen fertiliser	(4) habitat, back country areas and indigenous vegetation, or (5) amenity and recreation values and the ability of the public to freely access the coastal marine area, lakes and rivers.
	LF-LS-M11	Support – this is a valid resource management issue because of its effects on the life supporting capacity of soil, and impacts on freshwater	(b) the adoption of practices that reduce the risk of sediment and nutrient loss to water, including by minimising the area and duration of exposed soil, using buffers, avoiding land uses which result in any pugging in critical source areas, limiting high risk activities on steep slopes and actively managing critical source areas
Frank Griffin	Entire submission	Support	

		Recognise that practices building and storing soil carbon are good for the soil biology and the climate	
John Highton	SRMR 16 - Declining water quality	Support Note that declining water quality is a significant issue – and specify causes, including impacts of synthetic nitrogen fertiliser leading to intensive dairying which contaminates fresh water, drinking water, and the climate	Declining water quality
	LVFM-02, 7	Support	Note the impacts of land use and management such as intensive dairying and winter grazing lead to nutrient loss to water, and methane and nitrous oxide emissions to air plus other adverse effects.
Otago Water Resources Group 0235	SRMR 12 - Climate change	Support These are statements of fact	Climate change is likely to will impact our economy and environment Food and fibre production systems will need to change in response and to maintain food supply and important fibre sources for the community The region has an important role to play to reduce emissions including through land use production system adaptation and change.
	LF-WAI-P3 – Integrated management/ki uta ki tai	Support – this is a statement of fact	6(a) has regard to the need to reduce emissions that contribute to climate change including enabling

			changes to activities that will contribute to emission reductions
Ravensdown Ltd 0121	IM-P2 – Decision priorities	Oppose Retain proposed wording to reflect Te Mana o te Wai	Delete Policy IM-P2 in its entirety. Unless expressly stated otherwise, all decision making under this RPS shall: (1) firstly, secure the long-term life supporting capacity and mauri of the natural environment, (2) secondly, promote the health needs of people, and (3) thirdly, safeguard the ability of people and communities to provide for their social, economic, and cultural wellbeing
	LF-WAI-P4 – Giving effect to Te Mana o te Wai	Oppose, retain for clarity	All persons exercising functions and powers under this RPS and all persons who use, develop or protect resources to which this RPS applies must recognise that LF-WAI-O1, LF-WAI-P1, LFWAI-P2 and LF-WAI-P3 are fundamental to upholding Te Mana o te Wai, and must be given effect to when making decisions affecting fresh water, including when interpreting and applying the provisions of the LF chapter.
	Policy LF-FW-P7 – Fresh water	Oppose – this is an appropriate and transparent process for identifying the targets in question, whereas the targets proposed by Ravensdown are arbitrary and less visible to the community	(3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 980% of rivers and 98% of lakes, and (b) by 2040, 990% of rivers and 100% of lakes, and...

	Policy ECO-P6 – Maintaining indigenous biodiversity	Oppose, relief sought by the submitter diminishes the environmental outcomes sought by the policy, Te Mana o te Wai and the Resource Management Act	(1) avoid adverse effects where practicable as the first priority, (2) where adverse effects demonstrably cannot be completely avoided, they are minimised where practicable remedied, (3) where adverse effects demonstrably cannot be minimised completely avoided or remedied, they are remedied where practicable mitigated, (4) where there are more than minor residual adverse effects that cannot be avoided, minimised, or remedied, after avoidance, remediation, and mitigation, then the residual adverse effects are offset, where possible, in accordance with APP3, and (5) if biodiversity offsetting of more than minor residual adverse effects is not possible, then:...
	Method HAZ– NH-M2 – Local authorities	Oppose – retain wording as notified to ensure effects of climate change are anticipated and addressed even where there is uncertainty	... taking a precautionary approach when assessing and managing the effects of climate change where there is scientific uncertainty and potentially significant or irreversible effects,
Matthew Sole 00508	LF-VM-O1 – Otago wide vision	Support in full for clarity and specificity with addition of 'nutrients' as shown	Add a new overarching vision to apply to all FMUs in Otago as follows: "LF-VM-O1 – All of Otago catchment vision By no later than 2040, in all Otago catchments: (1) water bodies are protected at, or

			<p>restored to a state of good health, wellbeing and resilience, (2) activities relating to water support the health, well-being and resilience of affected water bodies, (3) the natural form and function of water bodies, including with respect to water quality, sedimentation, nutrients and flows, mimics that of their natural behaviour, (4) ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored, (5) wetland, estuary and lagoon extent has been restored as much as practical where it has been lost, and their quality is protected and restored, (6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments, (7) food is available to be harvested from water bodies in abundance and is safe to consume, (8) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies, (9) there are no direct discharges of waste water to water bodies, and (10) fresh water is managed in accordance with the LF-WAI objectives and</p>
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			policies.” Make the required consequential amendments to specific FMU visions in LFVM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where appropriate to be stronger than provided for in LF-VM-O1.
Lynne Stewart 00030	SRMR-I6-	Support The impacts of agriculture, especially intensive dairy and inputs such as synthetic nitrogen fertiliser are valid resource management issues	Declining water quality has adverse effects on the environment, our communities, and the economy Sediment and nutrients from agriculture should therefore be mentioned in this paragraph
	SRMR-I11- Cumulative impacts and resilience	Support, look to the future and anticipate uncertainty of current knowledge	Environmental: A statement should be included that states faced with insufficient knowledge and understanding a precautionary approach should be taken when making decisions or setting policy around natural resource management.
	IM-04- Climate change	support	The objective should be to support the national objectives for climate change by reforming the economy and the pattern of settlement in Otago so that we are able to reach zero net carbon emissions by 2050.
	IM-P10- Climate change adaptation and mitigation:	Support - including controls on intensive dairying which contributes 48% of greenhouse gas emissions	A policy should be included requiring councils to consider ways for reducing carbon emissions and

			achieving energy efficiency in all their planning documents.
	IM-M1- Regional and district plans:	Support – including controls on intensive dairying which contributes 48% of greenhouse gas emissions	Regional and district councils should be required to include in their plans policies and methods for reducing climate changing emissions.
	LF-WAI-P3 - Integrated management:	Support – acknowledge the effects of intensive dairying and its inputs such as synthetic nitrogen fertiliser on water bodies as a matter of resource management concern	A clause should be added ; Avoid the adverse effects of certain land uses by preventing or controlling land use changes or activities such as conversion to dairying on unsuitable soils close to vulnerable rivers and streams.
	LF-VM-02- Clutha Mata-au FMU vision:	Support – note the impacts of nutrient discharges (in particular from intensive dairying and its inputs)	(7)(b)(ii) Reword to the effect: The ecological function of all water bodies is protected and restored where degraded supported by innovative and sustainable land and water management practices which reduce discharges of nutrients and other contaminants to water bodies so they are safe for human contact and consumption,
	(8)	Support outcomes to occur in a timeframe that restores freshwater, consistent with timeframes of Te Mana o te Wai	Oppose the timeframe for outcomes to be achieved by 2050 for the Manuhērikia to be replaced with 2033. Explanation: The proposed timeframe gives ten years for farmers to make adjustments to their farming systems to adapt to new minimum flows and abstraction limits which is a realistic period for this to happen and avoids risks of

			exceeding an ecological threshold from which the river will not recover.
	LF-VM-04	Support – including intensive dairying inputs and effects	Taieri FMU vision; (8) Reword to the effect: “The ecological function of all water bodies is protected and restored where degraded supported by innovative and sustainable land and water management practices which reduce discharges of nutrients and other contaminants to water bodies so they are safe for human contact and consumption.
	LF-LS- P21	Support the explanation for the submitter’s relief – ‘Explanation: It is not possible to reduce indirect discharges of contaminants to water for some uses on some soil types such as dairying on alluvial soils adjacent to the Manuherikia. In these cases controls are required on such activities as intensive dairying and winter feeding forage crops’	Land use and fresh water Include a clause to the effect: Manage land uses that have an adverse effect on water quality that cannot be effectively managed through mitigation measures.
	LF_LS-M12-	Support Acknowledge contribution of intensive dairy to contamination of freshwater	District plans Add clause (C) controlling land use change to intensive dairy within areas identified by the ORC as sensitive to uncontrolled discharge of nutrients and sediment.
Shaping our Future 0113	Key submission point 2.3	Support Intensive dairying and its inputs contaminate fresh water, drinking water and lead to climate change.	Include outcomes such as Reduced contamination from urban and rural activities

		This contamination must be addressed if we are to achieve sustainable management of natural and physical resources	
Wise Response 00509		Support to reflect urgency and importance of climate change throughout the pORPS	Support submission in full
Pro forma submissions from: Misty Bean, Ben Abraham, Gypsy Jazz Adams, Frances Anderson, Lesley Anderson, Ra Baillie, Alistair Baird, Matthew Baird, Kelsey Baker, Martin Bauld, Clara Ballantyne, Jay Berriman, Roby Besley, Sharon Frew, Bill Gardner, Stasha Gillis, Ian Frazer, Thomas Beberidge, Jane Black, Kayla Boland, sue Bradley, Linda Buxton, Susan Camp, Demelza Campbell, Alistair Campbell, Ian Carpenter, Debbie Casey-Douglas, Lady Deborah Chambers, Jon Chapman, Zoe Charnin, Cadence Chung, Fiona Clements, Michael Coonrod, Phillipa Crawford, Adam Currie, Mike Currie, Maggie Cuthers, Marianna Davi, Laurie Davies, Hana Dawood, Nick Dawson, Ana Dennison, John Dickson, Holly Dove, Lila Dowsett, Barbara Ducrot, Jay Elliott, Kylie Ellis, Meg Evans, Anthony Field, Elaine Fischer, Katherine Flanagan, Irene Fluit, Tracey Flux, Bernard Fouke, , Sarita	Full submissions	Accept in full. These submissions reflect the broad concern among New Zealanders and Greenpeace supporters in particular, for better stewardship of our waters, and management of the inputs such as agricultural effects and synthetic nitrogen fertiliser, which currently degrade fresh and drinking water.	

<p> Gregor, Nicky Gregory, David Grimmett, Jane Hartstone, David Hawkins, Marie-Claire Henderson, Tania Hendry, Suzanne Hodges, Gary Hogg, Alison HornPatricia Hannah, Rosie Horn, Marion Horwell, Linda Hoskin, Peta Hudson, Siobhan Hughes, Wendy Hunter, Brenda Ives, Helen James, Neil James, Philippa Jamieson, Linda Jarvis, Stephen Jarvis, Fiona Johannessen, Abtim Karimi, Dylan Kaufman, Mike Kier, Christine Keller, Georgia Kirby, Don Kern, Camille Kouri, Alistair Knott, Hanneke Kroon, Emma Lakin, Toria Lamb, Jeff Lambert, Louise Lawrence, Karla Lawrie, Harry Lentell, Maxim Leusink, Elizabeth Liddell, Eva Lopez, Michael Lowe, Krystyna Marcjoniak, Marj Marks, Marion Marquand, Jonathan Marshall, Lis Marshall, Maire Matheson, Sue McCafferty, Lorraine McClintok, Michael McCutcheon, Mark McDonald, Tania McDonald, Phill McEntee, Kitt McGregor, Samantha McMillan, Janet Melbourne, Sophia Meldrum, Florence Micoud, Zena Miller, Brian Monckton, Melissa Moore, Andrea Morgan, Malcolm Gollan, Kate Goodman, Paul O'Connor, Jared Oliver, Jen Olsen, Shaun O'Neill, Liz </p>			
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<p>Palmer, Estee Paul, Janet Pereira, Colleen Pilcher, Raphael Ponce, Thomas Prebble, Frances Price, Victoria Quartly, Saleema Reeves, Christine Reitze, melany Remy, Steffan Rolfe, David Ronald, Christine Rose, Julie Rose, Raewyn Rowe, Birgit Rubensdoerffer, Rod Rust, Sergio Salis, Saskia Schenke, Martin Schlup, Ilona Scott, Jan Scown, Lisa Scurrah, Patrick Shannon, Yael Shimshon, Wif Simmons, Many Sinclair, Evelyn Skinner, Paul Smith, Brenda Stebbings, Hayley Stent, Judy Stevenson, Patrick Stokes, Jillian Sullivan, Donna Suszko, Andrwe Sutherland, Karen Swainson, Merren Taite, Rebecca Tanner, Storm Taylor, Frida Tengvar, Charlie Thomson, Jeanette Thorne, Brian Turner, Adair Valentine-Robertson, Sarah Van Eyndhoven, Melle van Heugten, Katrine Waite, Miem Wapstra, aaron Warrington, Mary Waymouth, Dirk Welschof, Jane Wickham, John willimas, Deborah Wolken</p> <p>And other submitters, including those whose addresses were not provided, as part of the Greenpeace Aotearoa pro forma submissions.</p>			
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