From:	Rick Zwaan
To:	RPS
Subject:	Forest & Bird further submissions on pORPS
Date:	Friday, 12 November 2021 2:46:41 p.m.
Attachments:	pORPS21 Forest & Bird Further Submissions.docx pORPS21 Forest & Bird Further Submissions.pdf

Kia ora,

Please see attached Forest & Bird's further submissions on the proposed Otago Regional Policy Statement.

Ngā mihi,

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You can join Forest & Bird at www.forestandbird.org.nz **or check us out at Facebook | Forest and Bird**

12 November 2021

TO: Otago Regional Council

Private Bag 1954, Dunedin 9054.

Attn: Otago Regional Council Policy Team

rps@orc.govt.nz

FROM: Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird)

Attn: Rick Zwaan

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021 845 587

Further submission on proposed Otago Regional Policy Statement 2021

1. Forest & Bird represents a relevant aspect of the public interest and has an interest greater than the public generally. Forest & Bird is a New Zealand non-governmental conservation organisation representing its members and supporters, and made a submission on the proposed Otago Regional Policy Statement 2021. Forest & Bird's constitutional purpose is:

   > *To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand*.

2. Forest & Bird wishes to be heard in support of this submission, and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.

Introduction

3. Forest & Bird is concerned that some of the decisions sought would result in loss of indigenous biodiversity and are inconsistent with the direction provided by the RMA, NZCPS, NES-F, and NPS-FM (2020). We oppose the amendments sought by these submissions.
4. Forest & Bird also supports a number of submissions which seek to amend the pORPS to protect, maintain, improve and indigenous biodiversity and other matters we raised in our primary submission
5. Our further submissions are set out in the Tables below

Support/opposition to overall submissions				
Submitter Number (and name)	**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].***
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	Overall submission	Support	Generally support Fish & Game's submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Fish & Game's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
00226 Kāi Tahu ki Otago / Aukaha	Overall submission	Support	Generally support Kāi Tahu ki Otago / Aukaha submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Kāi Tahu ki Otago / Aukaha submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
00223 Te Ao Marama	Overall submission	Support	Generally support 00223 Te Ao Marama submission as the relief sought will help to protect and restore water quality, significant water bodies,	Seek that the whole of Te Ao Marama submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief

			landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	
00120 Yellow-eyed Penguin Trust	Overall submission	Support	Generally support Yellow-eyed Penguin Trust submission as the relief sought will help restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Yellow-eyed Penguin Trust submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
00202 Central Otago Environmental Society	Overall submission	Support	Generally support Central Otago Environmental Society as the relief sought will help restore to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole Central Otago Environmental Society and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
00407 Greenpeace Aotearoa	Overall submission	Support	Generally support Greenpeace's submission in so far will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and	Seek that the whole of Greenpeace's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief

			help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	
0137 Director General Of Conservation	Overall submission	Support	Generally support Director General Of Conservation's submission in so far will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Director General Of Conservation's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
00136 Minister for the Environment	Overall submission	Support	Generally support Minister for the Environment 's submission in so far will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Minister for the Environment's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
00125 Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated	Overall submission	Oppose	Generally oppose Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated submission as some of the relief sought would limit the ability to protect and restore coastal and marine environments and in consistent with the NZCPS and other higher order documents.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief

00239 Federated Farmers of New Zealand	Overall submission	Oppose in Part	Forest & Bird generally opposes the relief sought by Federated Farmers submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with the NPSFM, and other higher order documents. Supports specific relief where specified to improve provisions to increase controls on pests in Otago.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
00322 Fulton Hogan Limited	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Fulton Hogan's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 of the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
00115 Oceana Gold (New Zealand) Ltd	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Oceana Gold's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 of the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief

00235 OWRUG	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by OWRUG's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 of the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
00301 Port of Otago Ltd.	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Port Otago's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NZCPS, s6 of the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
00412 Ernslaw One	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Ernslaw One's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 of the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
00321 New Zealand	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Infrastructure	Seek that the whole submission and all relief sought be disallowed unless

Infrastructure Commission			Commission's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and definitions in the RMA.	otherwise stated or where doing so would conflict with Forest & Bird's specific relief
00306 Meridian Energy Limited	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Meridian Energy Limited's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
00233 Fonterra Co – operative Group Limited	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Infrastructure Commission's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief

			NPSFM, s6 and other provisions in the RMA.	
00211 LAC Properties Trustees Limited	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by LAC Properties Trustees Limited submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
In addition, Forest & Bird seeks specific support/opposition to submission points by chapter detailed below:				
Interpretation				
Submitter Number (and name)	**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].**

00321 New Zealand Infrastructure Commission	00321.106	Oppose in Part	Agree that nationally consistent guidance on regionally significant infrastructure would be useful. Disagree to expanding the definition of Regionally Significant Infrastructure to include things like ski fields as doing so is outside the scope of the definition of 'infrastructure' in the RMA. It would not give effect to the NZPSFM and would be inconsistent with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act.	Seek that this submission point is disallowed
00315 Aurora Energy Limited	00315.014	Oppose	It's not always appropriate to allow for offsetting and compensation of effects in the effects management hierarchy and doing so can result in cumulative effects that negatively impact on indigenous biodiversity and degrade waterways.	Seek that this submission point is disallowed
00236 Horticulture New Zealand	00236.011	Oppose	It's unclear how this is intended to be used and may invariantly expand the indented meaning of 'human health' in the NPSFM	Seek that this submission point is disallowed
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.018	Support	This is an appropriate definition of the precautionary approach for this RPS and will help aid in achieving it's objectives and that of higher order instruments.	Seek that this submission point is allowed

00304 New Zealand Defence Force	00304.003	Oppose	There isn't a need to expand the definition of infrastructure and doing so may be detrimental to higher order instruments	Seek that this submission point is disallowed
00301 Port of Otago Ltd.	00301.004	Oppose	There isn't a need to expand the definition of infrastructure and doing so may be detrimental to higher order instruments especially in this case the NZCPS.	Seek that this submission point is disallowed
00301 Port of Otago Ltd	00301.005	Oppose	All commercial port activity isn't a lifeline utility and there isn't a need to expand the definition. Doing so would be inconsistent with the NZCPS and other higher order instruments.	Seek that this submission point is disallowed
00408 Business South Inc	00408.007	Oppose	It's unclear which new or expanded infrastructure Business South is seeking to include. Disagree that Lake Onslow is renewable generation as it would use more electricity than it generates.	Seek that this submission point is disallowed
00321 New Zealand Infrastructure Commission	00321.005	Oppose	Corrections and defence infrastructure are outside the scope of the definition of 'infrastructure' in the RMA and inconsistent with the definition of 'nationally significant infrastructure' in the NPSUD. It would not give effect to the NZPSFM and would be inconsistent with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act.	Seek that this submission point is disallowed

00301 Port of Otago Ltd.	00301.006	Oppose	Port facilities are already appropriately captured but 'commercial port activity' is incredibly and is outside the scope of the definition of 'infrastructure' in the RMA and inconsistent with the definition of 'nationally significant infrastructure' in the NPSUD. It would not give effect to the NZPSFM and would be inconsistent with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act. It's unclear why, for example, a small fishing vessel supplying a local Dunedin fish & chip shop should be considered nationally significant infrastructure.	Seek that this submission point is disallowed
00102 Ara Poutama Aotearoa the Department of Corrections	00102.001	Oppose	Corrections infrastructure is outside the scope of the definition of 'infrastructure' in the RMA. It would not give effect to the NZPSFM and would be inconsistent with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act.	Seek that this submission point is disallowed

00307 Christchurch International Airport Limited (CIAL)	00307.001	Oppose	Widening the definition to include 'ancillary infrastructure' introduces ambiguity beyond the intended definition of airport in the RMA and is outside the scope of the definition of 'infrastructure' in the RMA. It would not give effect to the NZPSFM and would be inconsistent with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act.	Seek that this submission point is disallowed
00239 Federated Farmers of New Zealand	00239.008	Oppose	This change would be inconsistent with and hamper the implementation of the NPSFM.	Seek that this submission point is disallowed
00233 Fonterra Co – operative Group Limited	00213.008	Oppose	This, and the associated suggested introduction of a definition of 'regionally significant industry' introduces significant ambiguity into the definition and would be outside the scope of the definition of 'infrastructure' in the RMA. It would not give effect to the NZPSFM and would be inconsistent with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act.	Seek that this submission point is disallowed
00138 Queenstown Lakes District Council	00138.106	Oppose	Landfills are outside the scope of the definition of 'infrastructure' in the RMA. It would not give effect to the NZPSFM and would be inconsistent	Seek that this submission point is disallowed

			with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act.	
00411 Wayfare Group Ltd	00411.020	Oppose	Ski Area infrastructure doesn't need to be defined as it shouldn't be recognised as regionally significant infrastructure.	Seek that this submission point is disallowed
00206 Trojan Holdings Limited (Trojan)	00206.013	Oppose	Ski Area infrastructure doesn't need to be defined as it shouldn't be recognised as regionally significant infrastructure.	Seek that this submission point is disallowed
00411 Wayfare Group Ltd	00411.022	Oppose	It's inappropriate to classify ski field infrastructure as regionally significant infrastructure as doing so would result in fewer controls on the adverse effects ski field operations create. It is also outside the scope of the definition of 'infrastructure' in the RMA. It would not give effect to the NZPSFM and would be inconsistent with councils' responsibilities under s6 of the RMA and inconsistent with the purpose of the Act.	Seek that this submission point is disallowed
SRMR – Significant resource management issues for the region				
Submitter Number (and name)	**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].***

00322 Fulton Hogan Limited	00322.004	Oppose	This addition is unnecessary and fails to recognise that aggregates can also be obtained from other sources such as recovery from building and construction. Including it would be inconsistent with the NPSFM and s6 of the RMA.	Seek that this submission point is disallowed
00115 Oceana Gold (New Zealand) Ltd	00115.006	Oppose	This addition is unnecessary and would elevate mining interests inappropriately.	Seek that this submission point is disallowed
00239 Federated Farmers of New Zealand	00239.022	Support	This is a useful addition to recognise the impact pests have on the region.	Seek that this submission point is allowed
00140 Waitaki District Council	00140.012	Support	Carbon forestry with exotics negatively impacts on indigenous biodiversity, water yield, and poses fire risks.	Seek that this submission point is allowed
00239 Federated Farmers of New Zealand	00239.021	Support	This is a useful addition to recognise the impacts climate change has on the region.	Seek that this submission point is allowed
RMIA – Resource management issues of significance to iwi authorities in the region				
Submitter Number (and name)	**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].***
00239 Federated Farmers of New Zealand	00239.029	Oppose	It's appropriate to include RMIA-WAI-I1 as it provides helpful context on issues important to Kāi Tahu	Seek that this submission point is disallowed

00115 Oceana Gold (New Zealand) Ltd	00115.009	Oppose	Mining has significant negative impacts on surface and groundwater and it's appropriate to include these in WAI-I5	Seek that this submission point is disallowed
IM – Integrated management				
Submitter Number (and name)	**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].***
00233 Fonterra Co – operative Group Limited	00213.022	Oppose	This is unnecessary and inaccurate. The region's well-being is enhanced by a range of factors and not simply infrastructure and industry. In particular, a healthy environment makes a significant contribution to well-being.	Seek that this submission point is disallowed
00322 Fulton Hogan Limited	00322.008	Oppose	Fails to recognise the need to provide for the resilience of natural systems too.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.018	Oppose	This new objective and associated policy (submission point 00306.022) fails to caveet that the NES-REG provisions explicitly do not apply to allocation decisions.	Seek that this submission point is disallowed
00022 Graymont (NZ) Limited	00022.005	Oppose	It's unclear what 'sustainable needs' are and fails to recognise that some	Seek that this submission point is disallowed

			existing activities will need to change and adapt in the face of climate change impacts	
00014 Mt Cardrona Station	00014.009	Oppose	Growth and development must be within the limits imposed by climate change impacts.	Seek that this submission point is disallowed
00014 Mt Cardrona Station	00014.010	Oppose	Growth and development must be within the limits imposed by climate change impacts.	Seek that this submission point is disallowed
00014 Mt Cardrona Station	00014.011	Oppose	Growth and development must be within the limits imposed by climate change impacts.	Seek that this submission point is disallowed
00115 Oceana Gold (New Zealand) Ltd	00115.012	Oppose	Retaining this policy is important to achieve the objectives and other policies of this RPS.	Seek that this submission point is disallowed
00239 Federated Farmers of New Zealand	00239.045	Oppose	It is essential that a precautionary approach is used to achieve the objectives and policies of the RPS	Seek that this submission point is disallowed
00139 Dunedin City Council	00139.042	Oppose	Timeframes are needed otherwise the methods become ineffective in achieving the objectives and policies.	Seek that this submission point is disallowed
00411 Wayfare Group Ltd	00411.034	Oppose in part	The list in (4) is useful to help establish how cumulative effects occur	Seek that this submission point is disallowed such that the list in (4) is retained
CE – Coastal environment				

Submitter Number (and name)	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].*
00239 Federated Farmers of New Zealand	00239.060	Oppose	This would unnecessarily narrow the policy to the extent that it wouldn't achieve the objectives, and would be inconsistent with the NZCPS. This would reduce the protection and restoration of indigenous biodiversity and threatened species.	Seek that this submission point is disallowed
00226 Kāi Tahu ki Otago / Aukaha	00226.146	Support	The changes sought would help to protect water quality and biodiversity.	Seek that this submission point is allowed
00226 Kāi Tahu ki Otago / Aukaha	00226.147	Support	These changes would help to avoid the negative impacts reclamation has	Seek that this submission point is allowed
00020 Raynoir Matarki Forests	00020.008	Oppose	Sediment controls on land are needed to reduce discharges of sediment including from harvesting plantation forestry in order to give effect to the NPSFM and NZCPS.	Seek that this submission point is disallowed
LF – Land and freshwater				
Submitter Number (and name)	**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].***
00306 Meridian Energy Limited	00306.031	Oppose in part	Renewable electricity generation should be a third priority to be consistent with the NPSFM.	Seek that this submission point is disallowed

00306 Meridian Energy Limited	00306.091	Oppose	There are a large number of factors that contribute to the health needs of people and it is inappropriate to elevate renewable electricity generation to this.	Seek that this submission point is disallowed
00239 Federated Farmers of New Zealand	00239.072	Oppose	Elevating primary production is inconsistent with Te Mana o te Wai and there is a need to apply a precautionary approach to avoid further degradation of waterways.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.032	Oppose	This inappropriately elevates the commercial use of freshwater which would be inconsistent with the hierarchy in Te Mana o te Wai	Seek that this submission point is disallowed
00136 Minister for the Environment	00136.004	Support	Overallocation is a large issue for Otago and needs to be addressed in order to achieve the other objectives.	Seek that this submission point is allowed
00137 Director-General of Conservation	00137.064	Support	Restoration of wetlands is essential to improve the health of indigenous biodiversity.	Seek that this submission point is allowed
00138 Queenstown Lakes District Council	00138.081	Oppose	Inappropriate to use 'balance' terminology as allocations need to be made consistent with the hierarchy in Te Mana o te Wai.	Seek that this submission point is disallowed
00137 Director-General of Conservation	00137.070	Support	These amendments would help protect and restore indigenous aquatic life.	Seek that this submission point is allowed
00306 Meridian Energy Limited	00306.034	Oppose	This addition introduces a degree of judgement and uncertainty into the policy and would be inconsistent with the NPSFM	Seek that this submission point is disallowed

00311 Trustpower Limited	00311.015	Oppose	This relief goes well beyond what's required in the NES-REG and would be inconsistent with it. The NES-REG only refers to '*recognising and providing for the benefits of renewable electricity generation'* and doesn't go as far as '*recognise, maintain and protect'* the output. Output is also intrinsically linked to allocation which is specifically not covered by the NES-REG. Allowing this relief would be inconsistent with the NPSFM.	Seek that this submission point is disallowed
00411 Wayfare Group Ltd	00411.043	Oppose	Construction of new infrastructure within wetlands should be avoided in order to retain the few that are left and be consistent with the NPSFM and NES-F.	Seek that this submission point is disallowed
00239 Federated Farmers of New Zealand	00239.087	Oppose	Water bodies are often an intrinsic part of ONFs and should be included.	Seek that this submission point is disallowed
00235 OWRUG	00235.095	Oppose	It's appropriate to avoid effects on outstanding water bodies, including those from infrastructure.	Seek that this submission point is disallowed
00411 Wayfare Group Ltd	00411.045	Oppose	It's appropriate to avoid effects on outstanding water bodies	Seek that this submission point is disallowed
00115 Oceana Gold (New Zealand) Ltd	00115.014	Oppose	In order to protect and restore indigenous biodiversity, the appropriate management of effects is needed.	Seek that this submission point is disallowed

00101 Toitū Te Whenua, Land Information New Zealand	00101.039	Support	A higher test is appropriate in order to protect water bodies in Otago. Adopt rationale of submitter.	Seek that this submission point is allowed
00237 Beef & Lamb NZ and Deer Industry NZ	00237.041	Oppose	This change would make it consistent with the policy it is meant to implement.	Seek that this submission point is disallowed
00020 Raynoir Matarki Forests	00020.012	Oppose	It's appropriate that the Otago RPS goes further than the minimums required in the NES-PF especially to restore the degraded states of streams, rivers wetlands, and lakes	Seek that this submission point is disallowed
00020 Raynoir Matarki Forests	00020.013	Oppose	It's appropriate that the Otago RPS goes further than the minimums required in the NES-PF especially to restore the degraded states of streams, rivers wetlands, and lakes	Seek that this submission point is disallowed
00226 Kāi Tahu ki Otago / Aukaha	00226.191	Support	This will help to give effect to the NPSFM	Seek that this submission point is allowed
00311 Trustpower Limited	00311.019	Oppose	These provisions inappropriately elevate hydroelectricity generation and would be inconsistent with the NPSFM.	Seek that this submission point is disallowed
00206 Trojan Holdings Limited (Trojan)	00206.039	Oppose	It's appropriate to avoid effects on significant values of outstanding waterbodies and inappropriate to allow for remedy and mitigation (which may not be possible).	Seek that this submission point is disallowed
00411 Wayfare Group Ltd	00411.051	Oppose	It's appropriate to avoid effects on significant values of outstanding waterbodies and inappropriate to	Seek that this submission point is disallowed

			allow for remedy and mitigation (which may not be possible).	
00115 Oceana Gold (New Zealand) Ltd	00115.002	Oppose	This would inappropriately elevate the importance of mining activities which has significant negative impacts on indigenous biodiversity, water quality, and air quality.	Seek that this submission point is disallowed
00115 Oceana Gold (New Zealand) Ltd	00115.016	Oppose	This would inappropriately elevate the importance of mining activities which has significant negative impacts on indigenous biodiversity, water quality, and air quality.	Seek that this submission point is disallowed
00226 Kāi Tahu ki Otago / Aukaha	00226.199	Support	This is a useful addition to add clarity to the intent of this objective	Seek that this submission point is allowed
00115 Oceana Gold (New Zealand) Ltd	00115.017	Oppose	This would inappropriately elevate the importance of mining activities which has significant negative impacts on indigenous biodiversity, water quality, and air quality.	Seek that this submission point is disallowed
ECO – Ecosystems and indigenous biodiversity				
Submitter Number (and name)	**Original submission point number**	**Support OR Oppose**	**There reasons for my support/opposition are:**	***I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].***
00321 New Zealand Infrastructure Commission	00321.023	Oppose	The exemptions for infrastructure need to be kept narrow in order to protect indigenous biodiversity and be consistent with s6 considerations.	Seek that this submission point is disallowed
00321 New Zealand	00321.103	Oppose	Compensation may not be appropriate where protection is a fair	Seek that this submission point is disallowed

Infrastructure Commission			and reasonable restriction of the bundle of rights and responsibilities that comes with landholdings.	
00306 Meridian Energy Limited	00306.048	Oppose	The existing objectives policies and methods in this chapter should equally apply to renewable electricity generation activities which can have adverse effects on indigenous biodiversity. This is needed in order to give effect to s6 considerations.	Seek that this submission point is disallowed
00138 Queenstown Lakes District Council	00138.039	Support	This is a useful addition to improve indigenous biodiversity and reduce the negative impact of exotic carbon forestry.	Seek that this submission point is allowed
00306 Meridian Energy Limited	00306.042	Oppose	The specificity of quality, quantity, and diversity is needed to ensure loss of indigenous biodiversity is halted.	Seek that this submission point is disallowed
00322 Fulton Hogan Limited	00322.027	Oppose	Identification of significant natural areas is needed to give effect to s6(c) of the RMA.	Seek that this submission point is disallowed
00115 Oceana Gold (New Zealand) Ltd	00115.020	Oppose in part	Inappropriate to amend this policy to give specific provision for minerals and aggregate industry which have adverse effects on significant natural areas.	Seek that this submission point is disallowed
00307 Christchurch International Airport Limited (CIAL)	00307.014	Oppose	It's appropriate to avoid the activity at this stage of the effects management hierarchy.	Seek that this submission point is disallowed

00306 Meridian Energy Limited	00306.045	Oppose	This amendment would weaken this provision as it introduces a number of qualifiers that would result in ongoing loss of indigenous biodiversity. The demonstrable test is important to put the onus on the applicant to demonstrate why they cannot completely avoid effects (i.e. puts the preference strongly on avoidance) rather than going straight to remedy or mitigate.	Seek that this submission point is disallowed
00115 Oceana Gold (New Zealand) Ltd	00115.022	Oppose	There shouldn't be a carve out for minerals extraction activities as these often has significant adverse effects on indigenous biodiversity.	Seek that this submission point is disallowed
00239 Federated Farmers of New Zealand	00239.105	Oppose	An ecological assessment is appropriate in order to protect indigenous biodiversity	Seek that this submission point is disallowed
00239 Federated Farmers of New Zealand	00239.113	Oppose	This would make it inconsistent with the related objectives and policies	Seek that this submission point is disallowed
EIT – Energy, infrastructure and transport				
Submitter Number (and name)	**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].***
00021 Matakanui Gold Limited	00021.010	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed

00021 Matakanui Gold Limited	00021.011	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed
00021 Matakanui Gold Limited	00021.012	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed
00021 Matakanui Gold Limited	00021.013	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed
00021 Matakanui Gold Limited	00021.014	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed
00021 Matakanui Gold Limited	00021.015	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed
00021 Matakanui Gold Limited	00021.016	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed
00021 Matakanui Gold Limited	00021.017	Oppose	This inappropriately elevates mining above other objectives and would be	Seek that this submission point is disallowed

			inconsistent with the protection of indigenous biodiversity and s6 of the Act.	
00021 Matakanui Gold Limited	00021.018	Oppose	This inappropriately elevates mining above other objectives and would be inconsistent with the protection of indigenous biodiversity and s6 of the Act.	Seek that this submission point is disallowed
00311 Trustpower Limited	00311.029	Oppose	This 'note' would carve out renewable electricity generation from a vast number of relevant provisions of the RPS making it inconsistent with the NPSFM, NZCPS, s6 of the Act, etc. Electricity generation activities can have significant adverse effects which need to be assessed and appropriately managed under the relevant other provisions.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.059	Oppose	This would carve out renewable electricity generation from a vast number of relevant provisions of the RPS making it inconsistent with the NPSFM, NZCPS, s6 of the Act, etc. Electricity generation activities can have significant adverse effects which need to be assessed and appropriately managed under the relevant other provisions.	Seek that this submission point is disallowed

00306 Meridian Energy Limited	00306.060	Oppose	This would carve out renewable electricity generation from a vast number of relevant provisions of the RPS making it inconsistent with the NPSFM, NZCPS, s6 of the Act, etc. Electricity generation activities can have significant adverse effects which need to be assessed and appropriately managed under the relevant other provisions.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.060	Oppose	Subclause (b) of this proposed amendment is not necessarily true. Renewable generation in itself doesn't reduce emissions. Emissions are only reduced when corresponding fossil fuel generation or energy use decreases.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.094	Oppose	This would carve out renewable electricity generation from a vast number of relevant provisions of the RPS making it inconsistent with the NPSFM, NZCPS, s6 of the Act, etc. Electricity generation activities can have significant adverse effects which need to be assessed and appropriately managed under the relevant other provisions.	Seek that this submission point is disallowed
00311 Trustpower Limited	00311.039	Oppose	This would carve out renewable electricity generation from a vast number of relevant provisions of the	Seek that this submission point is disallowed

			RPS making it inconsistent with the NPSFM, NZCPS, s6 of the Act, etc. Electricity generation activities can have significant adverse effects which need to be assessed and appropriately managed under the relevant other provisions.	
00306 Meridian Energy Limited	00306.051	Oppose	EIT-EN-O1 needs to be retained (with amendments as per Forest & Bird's primary submission). Clause 2 of this proposed amendment is not necessarily true. Renewable generation in itself doesn't reduce emissions. Emissions are only reduced when corresponding fossil fuel generation or energy use decreases.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.054	Oppose	The proposed directive wording inappropriately elevates renewable electricity generation above other considerations which would make it inconsistent with the hierarchy of considerations in Te Mana o Te Wai and other NPSFM provisions.	Seek that this submission point is disallowed
00311 Trustpower Limited	00311.034	Oppose	The proposed directive wording inappropriately elevates renewable electricity generation above other considerations which would make it inconsistent with the hierarchy of	Seek that this submission point is disallowed

			considerations in Te Mana o Te Wai and other NPSFM provisions.	
00311 Trustpower Limited	00311.036	Oppose	This would limit the considerations inappropriately and be inconsistent with other objectives in the RPS and higher order documents.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.057	Oppose	Consideration of other sites is appropriate in terms of attempting to avoid adverse effects.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.061	Oppose	The proposed directive wording inappropriately elevates renewable electricity generation above other considerations which would make it inconsistent with the hierarchy of considerations in Te Mana o Te Wai and other higher order documents.	Seek that this submission point is disallowed
00314 Transpower New Zealand Limited	00314.038	Oppose	This additional effects management policy adds unnecessary complexity to the RPS. Allowing for offsetting and compensation in the coastal area is inconsistent with the NZCPS	Seek that this submission point is disallowed
00321 New Zealand Infrastructure Commission	00321.051	Oppose	A constraint on the provision of infrastructure such as reference to limits is appropriate. Inaccurate to suggest the framework in the draft NBA provides for meeting limits via compensation.	Seek that this submission point is disallowed
00316 Dunedin International Airport Limited	00316.004	Oppose	‘recognise and provide for’ is in appropriate wording here and would be inconsistent with s6 and s7 of the RMA.	Seek that this submission point is disallowed

00411 Wayfare Group Ltd	00411.063	Oppose	Appropriate to prioritise site selection that avoids adverse effects.	Seek that this submission point is disallowed
00301 Port Otago Ltd.	00301.044	Oppose	The relief sought is inconsistent with the NZCPS. Any relief sought should be consistent with the outcome of the referenced Court of Appeal case, not the original relief sought by Port Otago's appeal.	Seek that this submission point is disallowed
HAZ – Hazards and risks				
Submitter Number (and name)	**Original submission point number**	**Support OR Oppose**	**The reasons for my support/opposition are:**	**Seek that the submission is allowed/disallowed**
00115 Oceana Gold (New Zealand) Ltd	00115.028	Oppose	It's entirely appropriate to avoid creating new contaminated land so the policy should be retained.	Seek that this submission point is disallowed
NFL – Natural features and landscapes				
Submitter Number (and name)	**Original submission point number**	**Support OR Oppose**	**The reasons for my support/opposition are:**	**Seek that the submission is allowed/disallowed**
00139 Dunedin City Council	00139.245	Oppose	Avoidance is appropriate where included in the policies and creates a helpful clarity in policy guidance.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.074	Oppose	It's in appropriate to exclude renewable electricity generation from these provisions and doing so would be inconsistent with s6 of the RMA	Seek that this submission point is disallowed

00226 Kāi Tahu ki Otago / Aukaha	00226.298	Support	The addition of seascapes is useful and consistent with NZCPS.	Seek that this submission point is allowed
00306 Meridian Energy Limited	00306.069	Oppose	Retaining 'highly valued' is important to ensure these are offered a degree of protection.	Seek that this submission point is disallowed
00306 Meridian Energy Limited	00306.070	Oppose	Appropriate to retain this policy	Seek that this submission point is disallowed
00115 Oceana Gold (New Zealand) Ltd	00115.030	Oppose	Appropriate to provide greater guidance and avoid significant effects. 'appropriate integration' lacks clarity.	Seek that this submission point is disallowed
00140 Waitaki District Council	00140.031	Support	Appropriate to include carbon forestry given the impact this activity has on landscapes	Seek that this submission point is allowed
APPENDICES AND MAPS				
Submitter Number (and name)	**Original submission point number**	**Support OR Oppose**	**The reasons for my support/opposition are:**	**Seek that the submission is allowed/disallowed**
00322 Fulton Hogan Limited	00322.044	Oppose	APP2 needs to be retained in order to assess the significance of natural areas and provide guidance to the rest of the RPS	Seek that this submission point is disallowed

Addresses for service:

Unique Submitter ID	Full Submitter Name	Primary Address for Service	Contact Person
00114	Mt Cardrona Station	laura.mclaughlan@al.nz	Laura McLaughlan
00020	Rayonier Matarki Forests	kelsey.tills@rayonier.com	Kelsey Tills
00021	Matakanui Gold Limited	craig@townplanning.co.nz	Craig Barr
00022	Graymont (NZ) Limited	bmurray@graymont.com	Benjamin Murray
00101	Toitū Te Whenua, Land Information New Zealand	IGunn@LINZ.govt.nz	Dr. Ini-Isabée Gunn
00102	Ara Poutama Aotearoa the Department of Corrections	maurice.dale@boffamiskell.co.nz	Maurice Dale
00115	Oceana Gold (New Zealand) Ltd	alison.paul@oceanagold.com	Alison Paul
00120	Yellow-eyed Penguin Trust	science-advisor@yeptrust.org.nz	Dr. Trudi Webster
00125	Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated	katekhesson@gmail.com	Kate Hesson
00136	Minister for the Environment	Macaela.flanagan@mfe.govt.nz	Macaela Flanagan
00137	Director-General of Conservation	mbrass@doc.govt.nz	Murray Brass
00138	Queenstown Lakes District Council	Erin.auchterlonie@qldc.govt.nz	Erin Auchterlonie
00139	Dunedin City Council	Anna.Johnson@dcc.govt.nz	Anna Johnson
00140	Waitaki District Council	vvanderspek@waitaki.govt.nz	Victoria van der Spek
00202	Central Otago Environmental Society	philh.murray@xtra.co.nz	Phil Murray
00206	Trojan Holdings	ben@cuee.nz	Ben Farrell
00211	LAC Properties Trustees Limited	laura.mclaughlan@al.nz	Laura McLaughlan
00223	Waihōpai Rūnaka, Te Rūnanga Ōraka Aparima, Te Rūnanga o Awarua	maria.bartlett@tami.maori.nz	Maria Bartlett
00226	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga	sandra@aukaha.co.nz	Sandra McIntyre
00231	Otago Fish and Game Council	nparagreen@fishandgame.org.nz	Nigel Paragreen

Unique Submitter ID	Full Submitter Name	Primary Address for Service	Contact Person
00233	Fonterra Co-operative Group Limited	Ben.Williams@chapmantripp.com	Brigid Buckley
00235	Otago Water Resource Users Group	bridget.irving@gallawaycookallan.co.nz	Bridget Irving
00236	Horticulture New Zealand	rachel.mcclung@hortnz.co.nz	Rachel McClung
00237	Beef + Lamb New Zealand Ltd	Lilly.Lawson@beeflambnz.com	Lilly Lawson
00239	Federated Farmers of New Zealand	elinscott@fedfarm.org.nz	Eleanor Linscott
00301	Port Otago Ltd	rmcgrouther@portotago.co.nz	Rebecca McGrouther
00304	New Zealand Defence Force	sbevin@tonkintaylor.co.nz	Sarah Bevin
00306	Meridian Energy Limited	andrew.feierabend@meridianenergy.co.nz	Andrew Feierabend
00307	Christchurch International Airport Limited (CIAL)	amy.hill@chapmantripp.com	Amy Hill
00311	Trustpower Limited	nicola.foran@trustpower.co.nz	Nicola Foran
00314	Transpower New Zealand Limited	ainsley@amconsulting.co.nz	Ainsley McLeod
00315	Aurora Energy Limited	joanne.dowd@auroraenergy.nz	Joanne Dowd
00316	Dunedin International Airport Limited	Phil.page@gallawaycookallan.co.nz	Phil Page
00321	New Zealand Infrastructure Commission, Te Waihanga	Robert.addison@tewaihanga.govt.nz	Robert Addison
00322	Fulton Hogan Limited	tensor@tonkintaylor.co.nz	Tim Ensor
00407	Greenpeace Aotearoa and 1259 supporters / direct submitters	crose@greenpeace.org	Christine Rose
00408	Business South Inc	mike.collins@business-south.org.nz	Mike Collins
00411	Wayfare Group Limited	ben@cuee.nz	Ben Farrell
00412	Ernslaw One Ltd	Peter.Weir@Ernslaw.co.nz	Peter Weir
00509	Wise Response Society Inc	secretary@wiseresponse.org.nz	Professor Elizabeth Slooten