

From: [Lilly Lawson](#)
To: [RPS](#)
Subject: B+LNZ and DINZ PORPS Further Submission
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[B+LNZ and DINZ Further Submission Otago pRPS - 12 November 2021.pdf](#)

Good Afternoon,

Please see attached a further submission on the Otago pRPS on behalf of Beef + Lamb New Zealand Ltd and Deer Industry New Zealand.

A copy of this further submission will be served on the necessary parties in the next five working days.

Kind Regards,

Lilly

Lilly Lawson | Environment Policy Analyst

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Further Submission

12 November 2021

TO THE

Otago Regional Council

ON THE

**Proposed Otago Regional Policy
Statement 2021**

BY

**Beef + Lamb New Zealand Ltd
and
Deer Industry New Zealand**

FURTHER SUBMISSION ON PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021

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And

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Deer Industry New Zealand and Beef + Lamb New Zealand Limited could not gain an advantage in trade competition through this submission.

Further Submission

A. Introduction

1. Beef + Lamb New Zealand Ltd (B+LNZ) and the Deer Industry New Zealand (DINZ) (collectively referred to forthwith as 'the submitters') welcome the opportunity to make a further submission on the proposed Otago Regional Policy Statement 2021 (pORPS).
2. B+LNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. Its mission is to deliver innovative tools and services to support informed decision making and continuous improvement in market access, product positioning, and farming systems.
3. B+LNZ is actively engaged in environmental issues that affect the pastoral production sector, and in building farmer specific capability and capacity in these areas to ensure that the industry supports an ethos of environmental stewardship, together with a vibrant, resilient, and profitable sector. Maintaining and where degraded enhancing the health of freshwater, aquatic habitats, and biodiversity across the region is important to the people of the Otago region, it is important for our economy, and it is important to farmers.
4. DINZ is a levy funded industry-good body established by the Deer Industry New Zealand Regulations (2004) under the Primary Products Marketing Act 1953. Its vision statement is 'To promote and assist the development of the New Zealand deer industry. A strong, stable, profitable industry for all participants.'
5. DINZ's levy payers are producers and processors of venison and velvet. There are roughly 1,400 deer farmers and 7 venison processing plants with approximately one million animals on farms. Otago is the third biggest deer region in New Zealand in terms of herd numbers.
6. The deer industry is the youngest pastoral-based industry in New Zealand (the first deer farm licence was issued in 1970) but provides complementary land use, diversified markets and additional revenue to other pastoral farming industries. Indeed about 80% of deer farmers also farm other livestock species.
7. The deer industry has particular affinity with the sheep and beef industry as:
 - a. Deer farms tend to be multi-species (i.e. deer are farmed along with sheep and/or beef cattle);
 - b. products derived from deer farms are similar (venison alongside beef and lamb, annual velvet harvesting alongside wool);
 - c. deer farms occupy the same land classes and run similar production systems (breeding, venison finishing/velvet) and have similar levels of inputs.
8. Both DINZ and B+LNZ are actively engaged in environmental management, with a particular emphasis on building farmers' capability and capacity to support an ethos of environmental stewardship, as part of a vibrant, resilient, and profitable sector based around thriving communities. Protecting and enhancing New Zealand's natural

capital and economic opportunities and the ecosystem services they provide is fundamental to the sustainability of the sector and to New Zealand's wellbeing for current and future generations.

B. Form 6

9. B+LNZ and DINZ could not gain an advantage in trade competition through this further submission.
10. B+LNZ and DINZ are making this Further Submission because, as industry good organisations representing New Zealand's sheep and beef and deer farmers, we have an interest in this Plan Change process which is greater than the general public interest.
11. The specific provisions of the proposal that B+LNZ and DINZ further submission relates to and the decisions it seeks from Council are as detailed on the following pages. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.
12. B+LNZ and DINZ wishes to be heard in support of its Further Submission and, is willing to consider presenting a joint case at hearing with other submitters addressing similar issues.
13. We can confirm that we are authorised to make this Further Submission on B+LNZ's and DINZ behalf and, that copies will be served on the persons who made the original submissions to which it relates within 5 working days of today's date.

Lilly Lawson
Environment Policy Analyst
Beef + Lamb New Zealand Limited

Lindsay Fung
Producer Manager
Deer Industry New Zealand

Further submission in support of, or in opposition to, submission on notified proposed Otago Regional Policy Statement 2021						
Submitter Name	Submitter Number	Submitter Point	Section of the Proposed Plan	B+LNZ and DINZ submission is that:		The decision that B+LNZ and DINZ would like Otago Regional Council to make and relief sought:
				SUPPORT /OPPOSE	REASON	
Balance Agri Nutrients	0409	007	LF-VM-O7	Neutral	B+LNZ supports the intent of this relief in recognising integrated solutions and considers this in keeping with the intent of the IM chapter.	That this submission be allowed.
		009 013	LF-VM-P6 LF-FW-P7	Oppose	Principally, B+LNZ opposes the duplication of national policy statement provisions in regional planning documents. The NPSFM requires consultation with tangata whenua and the community in the National objective's framework, it is unnecessary to repeat this in the pRPS.	That this submission be disallowed.
		014	LF-LS-P19	Support	B+LNZ has sought the deletion and redrafting of this subchapter but we support the suggested amendment in principle.	That this submission be allowed.
		015	LF-LS-P20	Oppose	It would be both ineffective and inefficient to require the management of sediment and diffuse discharges through promotion of changes in land use or land management practices without first determining whether the waterbody is degraded and whether these are the contaminants of concern.	That this submission be disallowed.
Director General of Conservation	00137	016	TERP – Definitions (SNA)	Support in part Oppose in part	B+LNZ and DINZ also seek that a definition of SNAs is included in the pRPS but seek it is in line with the NPS-IB (when it is released) for consistency.	That part of this submission be allowed.
		046	IM-P14	Oppose	B+LNZ and DINZ think they understand the intent of DOC's relief but are concerned with how it could be misinterpreted. The wording proposed is unlikely to 'capture' or encourage behavioural change in existing activities, nor does it recognise the benefits an activity, existing or new, may have. For example, food production is an essential activity, to advocate and incentivise activities which eliminate risk of environmental degradation creates a policy framework	That this submission be disallowed.

					whereby the value of such essential services is not recognised and puts increased risk and threat to productive and versatile soils. B+LNZ and DINZ consider that incentives should be available to existing activities to encourage behavioural change where required or to assist with the financial strain of making changes to reduce, mitigate or eliminate risk of environmental degradation.	
		049 050	CE-O1	Oppose	B+LNZ and DINZ oppose this relief, enhancement is only required where there is degradation.	That this submission be disallowed.
		064	LF-VM-O2	Support in part Oppose in part	B+LNZ and DINZ support relief for freshwater visions to provide a consistent and clear structure, recognise the relevant values and issues in every FMU and provide appropriate timeframes. B+LNZ and DINZ do not agree with the relief sought in relation to wetlands: Healthy wetlands do not require restoration. Where degraded, wetlands should be restored.	That part of this submission be allowed.
		065	LF-VM-O3	Support in part Oppose in part	B+LNZ and DINZ support relief for freshwater visions to provide a consistent and clear structure, recognise the relevant values and issues in every FMU and provide appropriate timeframes. Visions should not focus on land management practices.	That part of this submission be allowed.
		071	LF-FW-O9	Oppose	Where wetlands are degraded, they will require restoration, where they are not they should be protected, therefore 'or' is an appropriate conjoining word rather than 'and' as suggested.	That this submission be disallowed.
		100	EIT-EN-P2	Oppose	B+LNZ and DINZ support new and increased capacity of renewable energy but this needs to be within environmental limits (in particular water reliant renewable energy where water has been overallocated or is under pressure) and take into consideration the impact on the agricultural and urban land uses.	That this submission be disallowed.
		147 148	NFL-P2 NFL-P3	Oppose	It is the more than minor adverse effects on the values of the natural feature and landscape that need to be avoided.	That this submission be disallowed.

		157	APP2	Oppose	B+LNZ and DINZ seek that this appendix should be drafted in line with the operative NPS-IB when it is released.	That this submission be disallowed.
Dunedin City Council	00139	002	Gen-General Submission	Support	B+LNZ and DINZ support consistent and realistic timeframes.	That this submission be allowed.
		014 O18	SRMR SRMR-I5	Neutral	B+LNZ and DINZ in principle support the identification of matters which continue to have ongoing legacy effects as it supports the understanding of complex natural and physical resource management issues.	That this submission be allowed.
		019	SRMR-I10	Support	B+LNZ and DINZ support this relief. It is important to not make sweeping general assumptions and dismiss practices which are, and can be, adopted to manage effects.	That this submission be allowed.
		022	IM-O1	Support	B+LNZ and DINZ support the principle of this relief, failure to include human beings and the role they play in the natural environment is unrealistic and unobtainable and is inconsistent with Part 2 of the RMA which seeks to provide for human wellbeing but within environmental limits.	That this submission be allowed.
		026	IM-P1	Neutral	B+LNZ and DINZ support amendments to provide clarity where there are conflicts. The DCC's general comments on policy wording and weighting of policy language are supported.	That this submission be allowed.
		031	IM-P6	Support	B+LNZ and DINZ support this relief. Acting prematurely in the absence of full and complete information may result in sub-optimal resource management responses in the longer term. Short-term benefits from responding rapidly will likely be insignificant to those achieved if patience was exercised to make decisions on complete information sets. As drafted, this policy creates a framework which does not encourage making informed decisions.	That this submission be allowed.
		062	UFD-P7 UFD-P8	Oppose	It is appropriate to include a policy which seeks to recognise and manage the effects of urban expansion on rural land. Urban expansion and lifestyle properties place significant pressure on productive land and cause irreversible loss as is reflected in SRMR-I4. B+LNZ and DINZ consider that as drafted the pRPS is inadequate at recognising, providing for and protecting versatile soils, productive land use and at	That this submission be disallowed.

					avoiding adverse effects on versatile soils and productive land use.	
Federated Farmers of New Zealand	0239		Whole Submission	Support	B+LNZ and DINZ support FFNZ's submission. In particular we support: <ul style="list-style-type: none"> - decisions sought for greater recognition of the importance of the primary sector and food production. - The resolution of inconsistencies that left unresolved will add uncertainty, delay and render the RPS ineffective. - A transitioning chapter to demonstrate to the public that objectives and policies contained within the RPS represent a major change for Otago. 	That this submission be allowed.
Fonterra	0233	005	New definition	Support	B+LNZ and DINZ support the proposed definition of reverse sensitivity. As currently drafted, the pRPS does not protect existing activities from the issues arising from reverse sensitivity, in particular those associated with the encroachment of urban activity onto rural productive land and activities.	That this submission be allowed.
		009	TERP-Definitions (Sensitive activity)	Support	Similar to above, B+LNZ and DINZ support amendments to better manage the effects of reverse sensitivity.	That this submission be allowed.
		021 022	IM-O1	Support	B+LNZ support amendments which recognise that the management of resources has to take into account the need for people to use those resources and consider the social, cultural and economic effects.	That this submission be allowed.
		023	IM-P6	Support	B+LNZ and DINZ support amendments which seek to ensure that the necessary threshold and quality of information exists to make robust decisions.	That this submission be allowed.
		034	LF-WAI-P3	Support	B+LNZ and DINZ support amendments to recognise that people use water and will continue to need to use water for social economic and cultural wellbeing.	That this submission be allowed.
Forest & Bird	0230	014	Rural Area	Neutral	B+LNZ and DINZ recognise the intent of F&B submission on this point in ensuring that land captured in the term rural area is appropriate.	That this submission be allowed.

		075	LF-WAI-P3	Oppose	In regard to (8) B+LNZ and DINZ are concerned about objectives which seek to assess effects against naturalised flow and natural states of waterbodies, B+LNZ and DINZ consider this is unachievable and ignores the unavoidable impact that humans have had, and continue to have, on the natural environment	That this submission be disallowed.
		078	LF-VM-New Provision	Oppose in part. Support in part.	B+LNZ and DINZ consider it more prudent and effective to impose a realistic and achievable timeframe. It is our organisations' experiences that this will likely lead to greater engagement and empowerment of landowners. Conversely unrealistic short timeframes that mean that it is impractical to achieve outcomes are likely to leave landowners overwhelmed, disengaged, and disempowered. B+LNZ support consistency wording and policy direction.	That this submission be allowed in part.
		104	ECO-P5	Oppose	B+LNZ and DINZ do not support the addition of (3) <i>'the activity is not within 10m of a freshwater body or within the coastal environment'</i> . B+LNZ and DINZ consider that (1) and (2) are appropriate for managing the effects of existing (lawfully established) activities, recognising that it is appropriate to provide for such activities and that policy should be effects based. B+LNZ and DINZ do not consider (3) to be effects-based and instead applies a blanket new setback requirement that is inappropriate for existing activities.	That this submission be disallowed.
		113	ECO-M4-Regional Plans	Oppose	B+LNZ and DINZ consider (X) is unnecessary and excessive and extraneous, such a matter does not need to be explicit. As a function of Council, they are aware they can impose conditions and decline consents which do not meet the appropriate thresholds.	That this submission be disallowed.
		145	UFD-P7-Rural Areas		B+LNZ and DINZ oppose 'X'. It is appropriate to include a policy which seeks to recognise and manage the effects of urban expansion on rural land. Urban expansion and lifestyle properties place significant pressure on productive land and cause irreversible loss as is reflected in SRMR-I4. B+LNZ and DINZ consider that as drafted the pRPS is inadequate at recognising, providing for and protecting versatile soils, productive land use and at avoiding adverse effects on versatile soils and productive land use.	That this submission be disallowed.

Greenpeace Aotearoa	0407		Whole Submission	Oppose	B+LNZ do not support the submission made by Greenpeace Aotearoa (and the 1259 identical submissions).	That this submission be disallowed.
Horticulture New Zealand	0236	021	SRMR-General	Support	B+LNZ and DINZ support amendments to the introduction to acknowledge the community's reliance on natural resource from land and soils.	That this submission be allowed.
		022	SRMR-I1	Support	B+LNZ and DINZ support amendments which reflect the regionally significant value of food production.	That this submission be allowed.
		025	SRMR-I4	Support	B+LNZ and DINZ support amendments which gives context for productive land and rural areas. B+LNZ and DINZ supports further recognition of the irreversible loss of productive land to urban expansion than is currently provided for in the pRPS.	That this submission be allowed.
		031	SRMR-I10	Support	B+LNZ and DINZ support the recognition that the fault of the historic planning framework which has failed to protect Otago's natural and physical resources.	That this submission be allowed.
		033	SRMR-IX	Support	B+LNZ and DINZ support a new issues statement for Food Production, Food Supply and Food Security.	That this submission be allowed.
		040	IM-M4	Support	B+LNZ and DINZ supports amendments which highlights the need for climate change responses to be developed in consultation with food producers.	That this submission be allowed.
Kai Tahu Ki Otago	0226	033	TERP-Definitions	Support	B+LNZ and DINZ support amendments which seek to ensure the definition of primary production and its use in the pRPS does not capture inappropriate activities.	That this submission be allowed.
		131	CE-O1	Oppose	B+LNZ and DINZ do not consider that it is necessary or appropriate for the health of coastal waters to be prioritised in 'all' decision making.	That this submission be disallowed.
		132	CE-O2	Oppose	B+LNZ and DINZ consider that maintaining 'or' enhancing is the appropriate wording rather than 'and'. Not all existing access will require enhancement.	That this submission be disallowed.
		135	CE-O5	Oppose	B+LNZ and DINZ consider that the ' <i>functional or operational need</i> ' threshold suggested for activities locating in the coastal environment is too stringent. Not all activities will have more than minor adverse effects, but they may not be of a functional or operational need or meet the necessary	That this submission be disallowed.

					standard to provide for the cultural, social or economic wellbeing of people.	
		161	LF-WAI-P3	Oppose	B+LNZ and DINZ have concern about the suggestion to include 'natural' in (1) and (2) with regard to connections and interaction. Natural is an unrealistic and unachievable state to achieve as it fails to recognise that humans have, and continue to have, an unavoidable impact on natural and physical resources/	That this submission be disallowed.
		010	LF-VM-General	Oppose	<p>B+LNZ and DINZ oppose the suggestion for more restrictive timeframes of practice change within 10 years and visions to be achieved within 20 years. Despite the desire of Kā Rūnaka for FMU visions to be achieved within a generation,</p> <p>B+LNZ and DINZ consider it more prudent and effective to impose a realistic and achievable timeframe. It is our organisations' experiences that this will likely lead to greater engagement and empowerment of landowners. Conversely unrealistic short timeframes that mean that it is impractical to achieve outcomes are likely to leave landowners overwhelmed, disengaged, and disempowered. The sector is undergoing significant and continuing change in response to new policy and regulation, for example s360 stock exclusion regulations, NES-FW and the widespread and continued adoption of Farm Environment Plans.</p>	That this submission be disallowed.
		167	LF-VM-General	Oppose	<p>B+LNZ and DINZ query the appropriateness for the outcomes sought to apply to <i>all</i> FMU's. In particular, the abundance of mahika kai. B+LNZ and DINZ seek that visions for each FMU reflect engagement with tangata whenua and the community and that these are informed by an understanding of the history of, and environmental pressures on, the FMU as required as by the NSPFM2020.</p> <p>As stated above, B+LNZ and DINZ are concerned about objectives which seek to revert waterbodies to natural form and function. B+LNZ and DINZ consider this is unachievable and ignores the unavoidable impact that humans have had, and continue to have, on the natural environment.</p>	That this submission be disallowed.

		168	LF-VM-O2	Oppose	<p>As above, B+LNZ and DINZ do not support visions which seek to restore waterbodies to natural state as this is unachievable.</p> <p>B+LNZ and DINZ support Kāi Tāhu's acknowledgement that innovation in land and water management practices is a tool to achieve visions for freshwater. Innovation and flexibility are a key part of the dry stock sector's ability to respond and adapt to changing markets and environments. However, B+LNZ and DINZ do not support a blanket requirement to reduce discharges of nutrients and other discharges, not all land management practices will need to reduce discharges, and not all properties will need to reduce discharges. Such a focus on land management practices is more appropriate in regional plan framework when environmental outcomes and target attribute states to achieve these outcomes are set.</p>	That this submission be disallowed.
		169 170 171	LF-VM-O3 LF-VM-O4 LF-VM-O5	Oppose	<p>B+LNZ and DINZ do not support a shortened timeframe. B+LNZ and DINZ consider it more prudent and effective to impose a realistic and achievable timeframe. It is our organisations' experiences that this will likely lead to greater engagement and empowerment of landowners, while unrealistic short timeframes are likely to leave landowners overwhelmed, disengaged, and disempowered.</p> <p>It is contradictory to seek no further modification to the shape and behaviour of the water bodies but also seek to restore the natural form and function of waterbodies, as to achieve the latter, you must fail the former. Regardless, B+LNZ and DINZ do not support such an amendment as waterbodies change shape and behaviour naturally. See also, comments on O2 regarding blanket discharge requirements.</p>	That this submission be disallowed.
		191 204	LF-FS-O11 LF-LS-P19	Neutral	B+LNZ and DINZ agree that the term primary production requires clarification and refinement to avoid capturing activities that are unsuitable.	That this submission be allowed.
		208	Lf-LS-M11	Oppose	B+LNZ and DINZ oppose relief to change (2) from 'efficient allocation and use' to 'reduce demand' on freshwater.	That this submission be disallowed.

					Methods to achieve efficiency will reduce demand while supporting food production.	
Minister for the Environment	0136	002	SRMR	Neutral	B+LNZ and DINZ in principle support the identification of matters which continue to have ongoing legacy effects as it supports the understanding of complex natural and physical resource management issues. However, it is necessary to recognise this as a fault of the historic planning framework which has failed to protect Otago's natural and physical resources.	That this submission be allowed.
		003	LF – WAI – P1	Oppose	B+LNZ & DINZ do not agree that the existing wording is unduly limiting and could be interpreted to exclude land use decisions, which does not align with Te Mana o Te Wai or the Objective of NPS-FM. The purpose of the NPSFM is to manage natural and physical resources to achieve objective 2.1 of the NPSFM-2020.	That this submission be disallowed.
		004	LF-VM-O2	Oppose	Visions must set a goal for freshwater, not for land management practices as the Minister is setting here. Allocation is a land management practice.	That this submission be disallowed.
		005	LF-VM-O2	Oppose	B+LNZ and DINZ oppose the position that 2040 is a longer than reasonable timeframe for quality and flows, B+LNZ are also unsure where this date has come from as it is not listed in LF-VM-O2 (8). Realistic timeframes are an important aspect of resource management to ensure communities are empowered to achieve visions, rather than overwhelmed and disengaged.	That this submission be disallowed.
		006	LF-VM-P7	Oppose	B+LNZ has sought that P7 includes a timeframe for the phasing out of over allocation or align it to the long-term visions so that it is clear that overallocation is not addressed immediately, but rather in a structured way.	That this submission be disallowed.
		007	LF-FW-M6	Oppose	Allocation status (over-, fully- or below-allocated) is determined by the FMU's ability to achieve the freshwater value/environmental outcome. Before over allocation can be assessed, attributes, baseline states and target attribute states should be identified. Ideally, limits should also have been set. Without these it is not possible to assess over allocation using all the parts of the definition in the NPS-FM.	That this submission be disallowed.

					The NPSFM requires the setting of environmental flows and levels and the identification of take limits to meet these. It is unnecessary to explicitly clarify that flows and levels can be used to phase out over-allocation together and as part of limits. Particularly when considering (4) which should be amended to achieve environmental outcomes.	
		008	LF-FS	Neutral	B+LNZ has sought the redrafting of this subchapter but we support the suggested amendment in principle.	That this submission be allowed.
Otago Fish and Game Council	00231	018	New definition	Oppose	B+LNZ and DINZ supports a definition of precautionary approach but do not support what is proposed. In particular, B+LNZ and DINZ consider that acting in haste in the absence of complete information, can result in overall reduced benefit compared to waiting for full and complete information to inform appropriate and effective management responses.	That this submission be disallowed.
		019	New definition	Oppose	B+LNZ and DINZ oppose the submission to replace the words maintain, improve or enhance with protect and restore. In the pRPS, it is appropriate that the directives 'improve' or 'enhance' both direct movement in a positive direction but do not suggest how much movement is necessary as it is the role of regional plans to ascertain the extent of change required to meet environmental outcomes and achieve FMU visions. Any definition of restore should be linked to the achievement of environmental outcomes to achieve values for FMU.	That this submission be disallowed.
		041	IM-P15	Oppose	B+LNZ and DINZ do not support the removal of 'but could be significantly adverse'.	That this submission be disallowed.
		047	LF-WAI-P3	Oppose	B+LNZ and DINZ do not support (9) and (10). (9) environmental outcomes and limits are required by the NSPFM 2020 in order to achieve the values of the FMU. They do not need to be set against the naturalised flow and unpolluted state as inferred in the submission. (10) it is both ambiguous and unreasonable to require all activities affecting waterbodies to support the health, wellbeing and resilience of waterbodies and associated	That this submission be disallowed.

					freshwater ecosystems. Regional Plans are the appropriate means to determine how values for freshwater will be achieved including the type and extent of change, and where it is needed.	
		05	LF-VM-O2 to LF-VM-O6	Oppose	<p>B+LNZ and DINZ do not agree that the dates by which the visions are to be achieved are 'unnecessarily distant'. Realistic timeframes are an important aspect of resource management to ensure communities are empowered to achieve visions, rather than overwhelmed and disengaged.</p> <p>B+LNZ and DINZ are not opposed to an overarching vision in principle, however B+LNZ and DINZ are concerned about the appropriateness and achievability of that drafted by F&G. An overarching vision needs to be appropriate and achievable to all rivers, with the vision set at the FMU providing for its nuances and to reflect the desires of the community.</p>	That this submission be disallowed.
		055	LF-FW-P7	Oppose	As above, (1b) is ambiguous and unreasonable.	That this submission be disallowed.
		066	LF-LS-M11	Oppose	B+LNZ and DINZ considers that the suggested amendments to (b) is unnecessarily specific. Effective farm plans are those that are tailored specifically to the farm and farm system. B+LNZ and DINZ consider that the broadness of (b), including 'actively managing critical source areas' captures the key considerations of farm plans while providing the necessary flexibility and adaptability.	That this submission be disallowed.
Otago Water Resource Users Group	0235	Whole Submission		Support	<p>B+LNZ and DINZ support OWRUG's submission. In particular we support:</p> <ul style="list-style-type: none"> - Greater recognition of the food and fibre sector and the importance the sector is within Otago. - A transitioning chapter to demonstrate to the public that objectives and policies contained within the RPS represent a major change for Otago. 	That this submission is allowed.