

From: [Anna Sing](#)
To: [RPS](#)
Cc: [Carina Ross](#)
Subject: DairyNZ further submission proposed Otago Regional Policy Statement 2021
Date: Thursday, 11 November 2021 4:26:36 p.m.
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[form-6-written-further-submissions-form-on-proposed-otago-rps-2021 DairyNZ.docx](#)

Kia ora,

Please find attached our further submission on the proposed Otago Regional Policy Statement 2021.

Ngā mihi,

Anna Sing

Senior Regional Policy Advisor - Environment | Responsible Dairy
027 1800 2707

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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

DairyNZ Limited

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):

	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
<i>X</i>	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:	DairyNZ is making this Further Submission because, as the industry good organisation representing New Zealand's dairy farmers, it has an interest in the proposed plan which is greater than the general public's interest.
	the local authority for the relevant area.

4. I wish to be heard in support of my further submission.

5. If others make a similar submission, **I will** 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).

Justine Young

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: Justine Young

Position: Lead Regional Policy Advisor

Organisation: DairyNZ Limited

c. Date

10/11/2021

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

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

Carina Ross

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

Carina.ross@dairynz.co.nz

f. Telephone:

027-306 3134

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

24 Millpond Lane, Lincoln 7608

7. My further submission is:

I support/oppose the submission of:

[Obtain name and address of original submitter and submission number from Summary of Decisions Requested document].

NOTE: Please use a new further submission form for each different original submission you support/oppose

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

Submitter Name	Address for service	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):
Fonterra Co – operative Group Limited	c/o Chapman Tripp PO Box 2510, Christchurch 8140 M +64 27 469 7132 Ben.Williams@chapman tripp.com/ Rachel.Robilliard@chap mantripp.com	00213.021*	Support	DairyNZ agrees with the submitter that the social and economic wellbeing should be considered as part of managing natural and physical resources.	Allow Either: (a) Retain IM – O1 , but include the words “economic, social and cultural” before the word “well-being”, and/or (b) Include an additional objective that recognises that the management of resources has to take into account the need for people to use those resources and hence social, cultural and economic consideration needs to be integrated into policy and regulatory decision – making.
		00213.023*	Support	The addition to the policy would provide guidance on what ‘best information available’ is and make it clearer that decisions should be based on reliable data as far as possible. This is consistent with the NPS-FM 2020.	Allow Add the following words: Except that councils should: (a) use complete scientifically robust and/or professionally researched data where available; (b) Where the data described in (a) above is not available or is incomplete, prefer sources of information that provide the greatest degree of certainty; and (c) take all practical steps to reduce uncertainty.
Otago Water Resource	c/- Landpro P O Box 302	00235.003	Support	The potential implications on primary sector to give effect to Te Mana o Te Wai is not known. Until the development of the new Land and	Allow

Users Group (OWRUG)	Cromwell 9342 Andrea Richardson (03) 445 9905 andrea@landpro.co.nz kate@landpro.co.nz c/- Gallaway Cook Allan PO Box 143 Dunedin 9016 Bridget Irving (03) 477 7312 bridget.irving@gallawaycookallan.co.nz phil.page@gallawaycookallan.co.nz rebecca.crawford@gallawaycookallan.co.nz			Water plan has progressed further it is not possible to fully assess the time needed for primary sector to make changes and adjust to meet the long-term visions.	Amend chapter to set out a framework for setting timeframes to achieve long-term visions over a transition period, for the Regional Council to use when developing regional plan provisions to achieve long-term visions for freshwater across the Otago region. This framework should allow the food and fibre sector time to adjust at a rate that accounts for the potentially significant impacts on their social, economic, and cultural well-being.
		00235.005	Support	DairyNZ agrees with the submitter that amendments are needed throughout the RPS to give greater recognition of the importance of primary production.	Allow Seeks that the pRPS provisions, and in particular the Land and Freshwater chapter, are amended to provide stronger recognition of the importance of primary production land and the economic uses of soil.
Royal Forest and Bird Protection Society NZ (Forest & Bird)	Rick Zwaan r.zwaan@forestandbird.org.nz 021 845 587 PO Box 6230, Dunedin North, Dunedin 9059	00230.078	Oppose	A long-term vision is included in IM- integrated management chapter. It is confusing to add another overarching vision, potentially duplicating some of the objectives and policies. Further, it is not appropriate to set a more stringent timeframe without knowing the extent of reductions needed to achieve the objectives.	Disallow - 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 restored to a state of good health, well-being 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,

					<p>(6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments,</p> <p>(7) food is available to be harvested from water bodies in abundance and is safe to consume,</p> <p>(8) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies,</p> <p>(9) there are no direct discharges of waste water to water bodies, and</p> <p>(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 LF – VM – 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.</p>
Ravensdown Limited	<p>Planz Consultants Limited (Planz) PO Box 1845 CHRISTCHURCH 8140 Carmen Taylor Consultant Planner (Associate) 021 312 781 carmen@planzconsultants.co.n</p>	00121.057	Support	The proposed amendments align with the NPS-FM 2020.	<p>Allow</p> <p>Amend as follows: Environmental outcomes, attribute states (including target attribute states) and limits ensure that: ... (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</p>
Kāi Tahu ki Otago / Aukaha	<p>Sandra McIntyre Aukaha (1997) Ltd PO Box 446, Dunedin 9054 sandra@aukaha.co.nz 021 246 4138</p>	00226.010	Oppose	DairyNZ supports the need to make changes to achieve the visions. However, we don't support setting a general timeframe without knowing the level of reductions needed and the requirements for farmers. We consider that this should also be informed by an assessment of social and economic impact on the community.	<p>Disallow</p> <p>Timeframes for action in visions should require practices to change within 10 years and visions to be achieved within 20 years.</p>

Minister for the Environment	Macaela Flanagan Macaela.flanagan@mf e.govt.nz 022 023 4470 23 Kate Sheppard Place Wellington	00136.005	Oppose in part	Any timeframes should be informed by the assessment of water quality and quantity carried out for the development of the new Land and Water plan.	Disallow the part that refers to a shorter timeframe than 2040. Amend as follows: Amend LF – VM – O2 – Clutha Mata – au FMU vision (timeframes) to include interim steps in a manner similar to the consultation version of the pRPS, although 2040 for quality and flows may still be longer than reasonable.
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*Please be aware that these submission points probably have the wrong submitter ID. The submission points were included in the submission from Fonterra with submitter ID 00233.