



# Submission

*29 November 2022*

TO THE

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**OTAGO REGIONAL COUNCIL**

ON THE

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**PROPOSED OTAGO REGIONAL POLICY  
STATEMENT**

**FRESHWATER PLANNING INSTRUMENT**

BY

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

**SUBMISSION ON PROPOSED OTAGO REGIONAL POLICY STATEMENT  
PROPOSED FRESHWATER PLANNING INSTRUMENT PARTS**

*Clause 6 of First Schedule, Resource Management Act 1991*

To: Otago Regional Council

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

The specific provisions of the Proposed Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement (**PFPI**) that this submission relates to, and the decisions sought from Council, are as detailed on the following pages. The outcomes sought and the wording used are suggestions 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 or restructuring of the PFPI, or parts thereof, to give effect to the relief sought.

Beef + Lamb New Zealand Ltd and Deer Industry New Zealand wish to be heard in support of their submission; and will consider presenting a joint case at hearing with others presenting similar submissions.

## Section A: Introduction

1. Beef + Lamb New Zealand Ltd (B+LNZ) and Deer Industry New Zealand (DINZ) welcomes the opportunity to make a submission on the Proposed Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement (**PFPI**). B+LNZ and DINZ made a submission on 3 September 2021 on the Proposed Otago Regional Policy Statement (**PRPS**), including submission points on proposed provisions that are considered to be part of the PFPI. B+LNZ and DINZ also made a further submission on 12 November 2021. This submission on the PFPI should be read together with the 2021 submission and further submission on the PRPS. In the attached table of submission points, the references to 2021 Submission Points are references to the submission points and relief requested in the original submission dated 3 September 2021. The referenced submission points on the PRPS should be read as submission points on the identified parts of the PFPI.
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. 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.'
4. The deer industry has particular affinity with the sheep and beef industry as:
  - (i) Deer farms tend to be multi-species (i.e. deer are farmed along with sheep and/or beef cattle);
  - (ii) products derived from deer farms are similar (venison alongside beef and lamb, annual velvet harvesting alongside wool);
  - (iii) deer farms occupy the same land classes and run similar production systems (breeding, venison finishing/velvet) and have similar levels of inputs.
5. Both B+LNZ and DINZ 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 and biodiversity and the quality of the environment across the Otago region is important to the people and communities of the region. It is important for our economy, important for our future and it is important to farmers. B+LNZ and DINZ is actively building our work programme throughout the region to support the integrated and sustainable management of land and water resources.

6. B+LNZ and DINZ set out in the 2021 submission the reasons for its interest in the PRPS. Those reasons remain valid. In addition, is particularly interested in the PFPI as it is one of the first freshwater planning instruments publicly notified under the National Policy Statement for Freshwater Management 2020 (*NPS-FM*). B+LNZ and DINZ interest in the PFPI can be summarised as follows:
- (a) The sustainability of land and freshwater resources that are utilised for the sustainable production of food and fibre by drystock farming undertaken over such a large land area in the region is a significant resource management issue for B+LNZ and DINZ.
  - (b) To achieve integrated management of the region's land and freshwater resources, the policies and methods in the PFPI need to direct that land and freshwater plans address the sustainability of land and freshwater resources to produce food and fibre for the health needs of people and to allow people and communities to provide for their social, economic, and cultural well-being, now and in the future.
  - (c) The policies and methods in the PFPI need to support sustainable farming practices and innovation in food and fibre production systems to enable the sector to continue the significant contribution it makes as a physical, economic and social resource within the region.
  - (d) The policies and methods in the PFPI need to direct that there are comprehensive co-regulatory and voluntary process provisions in land and freshwater plans that provide for the active engagement of farmers with the regional council, mana whenua and community groups in the development of positive environmental outcomes, limits and targets, visions, action plans, monitoring programmes, reviews, and integrated adaptive risk-management approaches at FMU and sub FMU, and catchment and sub-catchment levels.
  - (e) The PFPI resource management response needs to recognise the role and commitment of drystock farmers to exercise their ethical obligations to existing and future generations when acting as stewards of the significant land area used by them. It must also recognise the existing integrated and sustainable farming management systems utilised by drystock farmers.
  - (f) Policies and methods in the PFPI need to apply an integrated land and freshwater management approach to implement the provisions of the NPS-FM to enable the protection, use, and development of land and freshwater resources to sustain food and fibre production in the region.
  - (g) The PFPI policies and methods also need to focus on restoring and preserving the balance between the water, the wider environment, and the community, to give effect to the fundamental concept of Te Mana o te Wai. The scope of the environment is as defined in the Resource Management Act 1991 (RMA). When determining that balance, the policies and methods in the PFPI addressing integrated decision-making, need to facilitate the application of the values and principles set out in the NPS-FM.



- (h) When considering the provisions in the PFPI pursuant to section 61 of the RMA, the Panel's decision on integrated management should ensure that there is a contextual and practicable convergence, alignment, and integration, with all other provisions of the PRPS.
7. The specific provisions of the PFPI that this submission relates to and the decisions it seeks are detailed in the attached table of submission points.
  8. The outcomes sought and the wording used are suggestions 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 PC1 including objectives, policies, or other provisions, or restructuring of PC1, or parts thereof, to give effect to the relief sought.
  9. Anticipating that there will be a short time period for consideration of further submissions, it would assist greatly if the Council could publish on its website as soon as practicable all submissions received – rather than waiting to publish those with the Schedule 1 summary of submission points.

We welcome the opportunity to further discuss any of the points above with your team, should you require more information. For any inquiries relating to this feedback please contact Lilly Lawson (Senior Environment Policy Analyst B+LNZ via the phone or email detailed on page 2 of this submission).

Yours faithfully,

Lilly Lawson  
Senior Environment Policy Analyst  
Beef + Lamb New Zealand  
29 November 2022

## Section B: Table of Submission Points and Requested Relief:

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
<b>PART 1</b>				
<b>Introduction &amp; General Provisions</b>				
<b>Definitions:</b>				
<b>Certified freshwater farm plan</b>	means a freshwater farm plan certified under section 217G, as amended from time to time in accordance with section 217E(2) or (3)	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects s. 217B of the RMA.	Retain the definition unchanged.
<b>Drinking water</b>	means water intended to be used for human consumption; and includes water intended to be used for food preparation, utensil washing, and oral or other personal hygiene.	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the National Planning Standards definition.	Retain the definition unchanged.
<b>National Objectives Framework</b>	means the framework for managing freshwater as described in subpart 2 of Part 3.	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the NPS-FM.	Retain the definition unchanged.
<b>Natural Hazard works</b>	means works for the purpose of removing material, such as trees, debris, and sediment, that— (a) is deposited as the result of a natural hazard, and (b) is causing, or is likely to cause, an immediate hazard to people or property.	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the NES-Freshwater 2020.	Retain the definition unchanged.

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
<b>Other infrastructure</b>	means infrastructure, other than specified infrastructure, that was lawfully established before, and in place at, the close of 2 September 2020.	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the NES-Freshwater 2020.	Retain the definition unchanged.
<b>Over-allocation</b>	in relation to both the quantity and quality of freshwater, is the situation where: (a) resource use exceeds a limit; or (b) if limits have not been set, an FMU or part of an FMU is degraded or degrading.	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the NPS-FM.	Retain the definition unchanged.
<b>Specified infrastructure</b>	has the same meaning as in clause 3.21 of the National Policy Statement for Freshwater Management 2020.	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the NPS-FM.	Retain the definition unchanged.
<b>Specified rivers and lakes</b>	means: (a) rivers that are fourth order or greater, using the methods outlined in the River Environment Classification System, National Institute of Water and Atmospheric Research, Version 1, and (b) lakes with a perimeter of 1.5km or more.	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the NPS-FM.	Retain the definition unchanged.
<b>Wetland utility structure</b>	has the same meaning as in regulation 3 of the National Environmental Standard for	2021 Submission Point 2: supported all submissions with the exception of 'Primary Production'.	The definition reflects the NES-Freshwater.	Retain the definition unchanged.

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
	Freshwater 2020 (as set out in the box below): ...			
<b>PART 2 Resource Management Overview</b>				
<b>SRMR Significant Resource Management Issues for the Region</b>				
<b>SRMR-15</b>	Freshwater demand exceeds capacity in some places	2021 Submission Point 11. Support in principle and in part, with amendments.	As set out in 2021 Submission Point 11.	Remove reference to goal of improving freshwater quality within 5 years.
<b>SRMR-16</b>	Declining water quality has adverse effects on the environment, our communities, and the economy.	2021 Submission Point 12. Oppose in part.	As set out in 2021 Submission Point 12. Also, the opening statement could be read as attributing declining water quality to rural land management practices, rural erosion and soil loss and rural nutrient discharges. It would benefit from acknowledging the contributions of contaminants from rural and urban sources.  B+LNZ and DINZ does not agree that the NPS-FM's intention is to improve water quality within five years as stated in the	As set out in 2021 Submission Point 12: Delete specific reference to stock access and winter grazing from the Environmental Impact Snapshot. If not deleted in its entirety, specifically recognise that these are regulated under the Resource Management Stock Exclusion Regulations 2020 and National Environment Standard for Freshwater as part of the wider Essential Freshwater Package 2020. If not deleted in its entirety, describe, and distinguish effects of urban development to the same extent as agricultural land uses.  In addition to the relief requested in Submission Point 12 of the 2021 submission, amend the opening statement of SRMR-16 as follows:



PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
			<p>Context section. The underlying purpose of the NPS-FM is more accurately described in Part 1.3 of the NPS-FM and is broader than just reversing past damage to water quality.</p>	<p><i>While the pristine areas of Otago generally maintain good water quality, some areas of Otago demonstrate poorer quality and declining trends in water quality which can be attributed to discharges <b><u>of contaminants including nutrients</u></b> from land use intensification (both rural and urban) and land management practices. Erosion, run-off and soil loss <b><u>from rural and urban activities</u></b> can lead to sediment and nutrients being deposited into freshwater bodies resulting in declining water quality.</i></p> <p>Amend the text of the Context section of SRMR-16 as follows:</p> <p><i>On 3 September 2020, new National Environmental Standards (NESF), <b><u>came into force, including restrictions on some agricultural practices and stock access to waterbodies, that apply in addition to regional plan rules. The and a new National Policy Statement for Freshwater Management 2020 (NPSFM)</u></b><sup>27</sup> <b><u>introduced a hierarchy of obligations to recognise the fundamental importance of water and restore and preserve the balance between the water, the wider environment and the community. came into force to improve water quality, within five years; and reverse</u></b></i></p>

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
				<b><i>past damage and bring New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation.</i></b>
SRMR-I9	Otago lakes are subject to pressures from tourism and population growth.	2021 Submission Point 14: Support.		Retain as publicly notified.
<b>PART 3</b>				
<b>Domains and Topics</b>				
<b>LF Land and Freshwater</b>				
<b>LF Land and Freshwater (entire Chapter)</b>		2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission. Undertake the necessary research, analysis, and evaluation to understand Otago's soil and water resources before redrafting the LF chapter. B+LNZ and DINZ are involved in the Otago Economic Work Programme to assist in the understanding of the economic and environmental impact of proposed policy on the dry stock sector. Better align the LF chapter with the NPS-FM and National Policy Statement for Highly Productive Land (NPS-HPL).
<b>LF-WAI-O1</b> <b>Te Mana o te Wai</b>	The mauri of Otago's 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: ....	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	As set out in 2021 Submission Point 24.

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
<b>LF-WAI-P1</b> <b>Prioritisation</b>	In all management of fresh water in Otago, prioritise: ....	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	As set out in 2021 Submission Point 24.
<b>LF-WAI-R1</b> <b>Principal Reasons</b>	In accordance with the NPSFM, councils are required to implement a framework for managing freshwater that gives effect to Te Mana o te Wai. This places the mauri (life-force) of the water at the forefront of decision making, recognising te hauora o te wai (the health of the water) is the first priority, and supports te hauora o te taiao (the health of the environment) and te hauora o te takata (the health of the people). It is only after the health of the water is sustained that water can be used for economic purposes. Giving effect to Te Mana o te Wai requires actively involving takata whenua in freshwater planning and management.	Support in part	The fundamental concept of Te Mana o te Wai is more accurately described in Part 1.3 of the NPS-FM. The NPS-FM does not direct that <i>'it is only after the health of the water is sustained that water can be used for economic purposes'</i> . It would be more useful to refer to the fundamental concept of Te Mana o te Wai, using the wording of Part 1.3 of the NPS-FM and the six principles set out in Part 1.3 (4). In particular, the concept of restoring and preserving the balance between the water, the wider environment, and the community.	Amend the wording of Principal Reasons LF-WAI-R1 to accurately reflect the wording of Part 1.3 (1), (2), (3) and (4) of the NPS-FM and include discussion of integrated management of freshwater resources (ki uta ki tai).
<b>LF-WAI-AER2</b>	The mauri of Otago's water bodies and their health and well-being is protected.	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	As set out in 2021 Submission Point 24.

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
<b>LF-VM FMU Visions</b>				
<b>LF-VM-O2 Clutha Mata-au</b>	In the Clutha Mata-au FMU: (1) management of the FMU recognises that: ...	2021 Submission Point 26: Oppose.  2021 Submission Point 27: Oppose 7 (b) (ii) and (iii).	As set out in 2021 Submission Point 26.	Amend the provision to provide clarification of the timeframe for (1)-(6). Further, the timeframe should be amended to 2050 to align with timeframe in (8) for Manuherekia.  Amend subsection (ii) as follows: ...discharges of nutrients and other contaminants to waterbodies <b>where necessary to ensure so</b> that they are safe for human contact,... Amend subsection (iii) as follows: ...discharges of nutrients and other contaminants to waterbodies <b>where necessary to ensure so</b> that they are safe for human contact,...
<b>LF-VM-O3 North Otago</b>	By 2050 in the North Otago FMU: (1) fresh water is managed in accordance with the LF-WAI objectives and policies, while recognising that the Waitaki River is influenced in part by catchment areas within the Canterbury region, ...	2021 Submission Point 28: Oppose.	As set out in 2021 Submission Point 28.	Amend section (5) to: - focus on a freshwater goal rather than land management practices e.g., ' <b>more waterbodies are safe for human contact more often</b> ' - focus on main contaminant of concern rather than nutrients, e.g., ' <b>faecal contamination of waterbodies is reduced so that more waterbodies are suitable for human contact more often</b> '. - focus on overall reduction in sources of contamination rather than all land management practices.
<b>LF-VM-O4 Taieri</b>	By 2050 in the Taieri FMU:	2021 Submission Point 29: Oppose.	As set out in 2021 Submission Point 29.	Amend to provide clarification on what level of restoration is required. If the

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
	(1) fresh water is managed in accordance with the LF-WAI objectives and policies, ...			drafting intended to capture healthy wetlands rather than degraded wetlands, provide an explanation as to why ORC considers that healthy wetlands need restoration rather than sustainment.
<b>LF-VM-O5 Dunedin &amp; Coast</b>	By 2040 in the Dunedin & Coast FMU: (1) fresh water is managed in accordance with the LF-WAI objectives and policies, ...	Support in part:	B+LNZ and DINZ supports clauses (1), (2), (3) and (5). Clause (4) takes an absolute approach ('no further modification' of any kind in all waterbodies). There is no section 32 justification for the absolute avoidance approach proposed by Clause (4). Modification of the 'shape' of water bodies could result from natural processes in any event. The vision statement should focus on maintaining the natural character of waterbodies.	<b>Amend Clause (4) as follows or similar to achieve a similar outcome:</b>  (4) <del>there is no further modification of the shape and behaviour the natural character (including natural form and function) of the water bodies is maintained,</del> and opportunities to restore the natural form and function of water bodies are promoted wherever possible, and...
<b>LF-VM-O6 Catlins</b>	By 2030 in the Catlins FMU: (1) fresh water is managed in accordance with the LF-WAI objectives and policies, ...	2021 Submission Point 30: Oppose in part.	As set out in 2021 Submission Point 30.	Redraft provision to support enhancement of access where appropriate, e.g., ' <u>access of Kāi Tahu whānui to mahika kai is maintained and its improvement is promoted where appropriate</u> '.
<b>LF-VM-P5 FMUs and Rohe</b>	Otago's fresh water resources are managed through the following freshwater	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	As set out in 2021 Submission Point 24.



PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
	management units or rohe which are shown on MAP1:...  (Table 3 detailing FMUs and rohe).			
<b>LF-VM-P6 Relationship Between FMUs and Rohe</b>	Where rohe have been defined within FMUs: ...	2021 Submission Point 31: Oppose.	As set out in 2021 Submission Point 31.	Amend policy so that it properly reflects the requirements of the NPSFM.
<b>LF-VM-E2 Explanation</b>	Implementing the NPSFM requires Council to identify Freshwater Management Units (FMUs) that include all freshwater bodies within the region. ...	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	As set out in 2021 Submission Point 24.
<b>LF-FW-O8 Fresh Water</b>	In Otago's water bodies and their catchments: (1) the health of the wai supports the health of the people and thriving mahika kai, ...	2021 Submission Point 33: Oppose.	As set out in 2021 Submission Point 33.	Suggest deleting entire policy or retaining sections (3) and (5) only. If section (5) is retained, amend (5) as follows: the significant and outstanding values of Otago's outstanding water bodies are identified and <b>protected sustained</b> .
<b>LF-FW-O9 Natural Wetlands</b>	Otago's natural wetlands are protected or restored so that: (1) mahika kai and other mana whenua values are sustained and enhanced now and for future generations, ...	2021 Submission Point 34: Oppose.	As set out in 2021 Submission Point 34.	Amend section (1) to provide better clarity on what needs to be enhanced, to what level, what the endpoint of enhancement is. Amend section (2) to provide clarity on what 'the range' means. Amend section (3) to identify an end state for improvement. Also amend (3) to delete the reference to amenity values: 'hydrological

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
				functioning, <del>amenity values</del> , extent or water quality...'
<b>LF-FW-P7 Fresh Water</b>	Environmental outcomes, attribute states (including target attribute states) and limits ensure that: (1) the health and well-being of water bodies is maintained or, if degraded, improved, ...	2021 Submission Point 36: Oppose.	As set out in 2021 Submission Point 36.	Remedy sought is that ORC undertake the relevant and necessary analysis to inform this sort of regulatory instrument. Once this has been done, replace provision with one based on analysis of current state and costs of achievement, and in line with the NPS-FM.  Section (5) should also refer to freshwater being allocated efficiently (both quality and quantity) to reflect Policy 11. It would be useful to state a timeframe for the phasing out of over allocation, or align it to the long-term visions, so it is clear that overallocation is not addressed immediately, rather in a structured way. The wording in (6) should be 'limits' in line with the NPS-FM wording. This incorporates limits for quality and take limits for quantity.
<b>LF-FW-P9 Protecting Natural Wetlands</b>	Protect natural wetlands by: (1) avoiding a reduction in their values or extent unless: ...	Oppose.	The wording of Policy LF-FW-P9 is similar to, but not identical to, the wording of the compulsory policy for natural inland wetlands set out in Part 3.22 of the NPS-FM. It is not clear whether Policy LF-FW-P9 applies also to coastal natural wetlands.	Clarify whether Policy LF-FW-P9 is intended to apply to coastal natural wetlands and amend the wording of LF-FW-P9 to reflect the wording of the NPS-FM (Part 3.22).

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
<b>LF-FW-P10 Restoring Natural Wetlands</b>	Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible: (1) an increase in the extent and quality of habitat for indigenous species, (2) the restoration of hydrological processes, (3) control of pests and vegetation clearance, and (4) the exclusion of stock.	2021 Submission Point 37: Oppose.	As set out in 2021 Submission Point 37.	Amend the provision to delete 'requiring' and replace it with 'encourage' or 'support'. Qualify sections (1) and (2) to clarify how much increase and restoration is required. Specifically exempt sheep in section (4) or delete the provision. Amend section (4) to reflect the exclusion of stock where that is necessary to enhance values, not as a blanket provision.
<b>LF-FW-M6 Regional Plans</b>	Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and, after it is made operative, maintain that regional plan to: ...	2021 Submission Point 43: Oppose.	As set out in 2021 Submission Point 43.	Delete the provision and replace it with a policy which links back to achieving Te Mana o te Wai and to achieving the long-term visions for each FMU.
<b>LF-FW-M7 District Plans</b>	Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to: ...	2021 Submission Point 44: Oppose.	As set out in 2021 Submission Point 44.	Amend the method to include provisions that address all adverse effects of urban development, including providing for drinking water, wastewater treatment, and effects of earthworks on waterbodies. Amend (2) so it is more consistent with Policy 8 NPS-FM and to address only those effects necessary, similar to the submission on LF-FW-M5 above. Amend (3) ensure stormwater can be managed in a way that is consistent

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
				with achieving the long-term vision in all cases.
<b>LF-FW-M8 Action Plans</b>	Otago Regional Council: (1) must prepare an action plan for achieving any target attribute states for attributes described in Appendix 2B of the NPSFM, (2) may prepare an action plan for achieving any target attribute states for attributes described in Appendix 2A of the NPSFM, and (3) must prepare any action plan in accordance with clause 3.15 of the NPSFM.	2021 Submission Point 45: Oppose.	As set out in 2021 Submission Point 45.	Please provide more certainty about the process and how ORC will consult with community, about options and costs for example.
<b>LF-FW-E3 Explanation (para. 2)</b>	The outcomes sought for natural wetlands are implemented by requiring identification, protection and restoration. ...	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.
<b>LF-FW-E3 (para. 5)</b>	The impact of discharges of stormwater and wastewater on freshwater bodies is a significant issue for mana whenua and has contributed to water quality issues in some water bodies. The policies set out a range of actions to be implemented in order to improve the quality of these discharges and reduce their adverse effects on receiving environments.	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
<b>LF-FW-PR3</b> <b>Principal Reasons</b>	Otago's water bodies are significant features of the region and play an important role in Kāi Tahu beliefs and traditions. ...	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.
<b>LF-FW-AER 4</b>	Fresh water is allocated within limits that contribute to achieving specified environmental outcomes for water bodies within timeframes set out in regional plans that are no less stringent than the timeframes in the LF-VM section of this chapter.	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.
<b>LF-FW-AER 5</b>	Specified rivers and lakes are suitable for primary contact within the timeframes set out in LF-FW-P7.	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.
<b>LF-FW-AER 6</b>	Degraded water quality is improved so that it meets specified environmental outcomes within timeframes set out in regional plans that are no less stringent than the timeframes in the LF-VM section of this chapter.	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.
<b>LF-FW-AER 7</b>	Water in Otago's aquifers is suitable for human consumption,	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.



PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
	unless that water is naturally unsuitable for consumption.			
<b>LF-FW-AER 8</b>	Where water is not degraded, there is no reduction in water quality.	2021 Submission Point 24. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 24.	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24.
<b>LF-LS</b>	Whole chapter	2021 Submission Point 46: Oppose.	As set out in 2021 Submission Point 46.	2021 Submission Point 46 requested that the whole LF-LS Chapter be redrafted once the NPS-HPL is available to focus on soil as a valuable resource in its own right and recognise farmed land within all LUC classes as important to food and fibre production. Now that the NPS-HPL has come into effect, B+LNZ and DINZ anticipates that ORC will want to revisit the wording of Chapter LF-LS and refine the wording of some provisions in light of the requirements of the NPS-HPL. B+LNZ and DINZ wishes to record that that, if ORC intends to make substantive changes to the LF-LS Chapter to accommodate the new requirements of the NPS-HPL, it would welcome an opportunity to contribute to refinement of the wording prior to finalisation of any recommended wording changes through a s. 42A report.
<b>LF-LS-P18 Soil Erosion</b>	Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by: ...	2021 Submission Point 46. Oppose the entire LF Chapter.	As set out in 2021 Submission Point 46.	Amend as necessary to address 2021 Submission Point 46.

PFPI Reference:	Provision:	B+LNZ, DINZ Submission Point:	Reasons:	Requested Relief:
<b>LF-LS-P21</b> <b>Land Use and Fresh Water</b>	Achieve the improvement or maintenance of fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) reducing direct and indirect discharges of contaminants to water from the use and development of land, and (2) managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater.	2021 Submission Point 47: Oppose.	This provision is in the wrong subchapter, it should be under LF-FW.	Delete this provision or move it to LF-FW.
<b>LF-LS-M11</b> <b>Regional Plans</b>	Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and then, when it is made operative, maintain that regional plan to: ...	2021 Submission Point 49: Oppose.	This provision is in the wrong subchapter, it should be under LF-FW.	Delete this provision or move it to LF-FW.