Submission on the Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement 2021

To: **Otago Regional Council**

Name of submitter: **Contact Energy Limited**

1. This is a submission on the Freshwater Panning Instrument Parts of the Proposed Otago Regional Policy Statement 2021 (**Freshwater pORPS**).

2. Contact Energy Limited (**Contact**) could not gain an advantage in trade competition through this submission.

3. The specific provisions of the Freshwater pORPS that Contact's submission relates to are identified in the table attached as **Attachment A**.

4. Contact's submission is set out in full in Attachment A, which identifies the provisions that Contact supports or opposes, explains the reasons for that support or opposition, and sets out the relief sought. However, in summary:

    - Contact is the second-largest electricity generator/retailer in Aotearoa New Zealand with a flexible and largely renewable portfolio of electricity generation assets. Contact owns and operates 11 generating stations across the country, and generally produces 80-85 percent of its electricity from renewable hydro and geothermal resources.

    - In the Otago region, Contact operates the Clutha Hydro Scheme (**CHS**), which is nationally significant infrastructure and contributes approximately 10 percent of Aotearoa New Zealand's overall electricity supply and on average 12 percent of Aotearoa New Zealand's renewable electricity generation.

    - The NPSFM directs regional councils to have regard to the importance of the CHS to meeting New Zealand's greenhouse gas emission targets; and maintaining the security of New Zealand's electricity supply; and the importance of its generation capacity, storage, and operational flexibility.

    - Contact seeks provisions in the Freshwater pORPS that appropriately recognise this national direction, as well as national direction for renewable electricity generation more generally as provided for under the NPSREG.

5. Contact seeks that the Otago Regional Council amend the Freshwater pORPS to incorporate the relief sought by Contact in Attachment A and such other further or consequential amendments as may be necessary to respond to Contact's submission.

6. Contact wishes to be heard in support of its submission.

7. We confirm that we are authorised to provide this submission on behalf of Contact.

David Allen

On behalf of Contact Energy Limited

Date: 29 November 2022

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ATTACHMENT A

Contact's submissions on the Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement 2021

	Provision	Page number	Notified version[1] Background document version[2]	Contact's comments	Changes requested[3]
	Interpretation				
1.	**Drinking water**	22	has the same meaning as in Standard 14 of the National Planning Standards 2019 (as set out in the box below) 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	Contact **supports** this definition as it is consistent with the National Planning Standards.	No changes requested.
		6	No change.		
2.	**Natural hazard works** -	30	has the same meaning as in regulation 51(1) of the National Environmental Standard for Freshwater 2020 (as set out in the box below) 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	Contact **supports** this definition as it is consistent with the National Environmental Standard.	No changes requested.
		6 185	No change.		
3.	**Other infrastructure**	31	has the same meaning as in regulation 3 of the National Environmental Standard for Freshwater 2020 (as set out in the box below) means infrastructure, other than specified infrastructure, that was lawfully established before, and in place at, the close of 2 September 2020	Contact **supports** this definition as it is consistent with the National Environmental Standard.	No changes requested.
		6 185	Same as above.		

[1] Proposed Otago Regional Policy Statement – Parts considered to be a Freshwater Planning Instrument under section 80A of the Resource Management Act 1991, notified 15 September 2022
[2] This version shows the changes supported by Council officers in the *Background document – Freshwater Planning Instrument (prepared for information purposes only)*, dated 30 September 2022, including changes in the previous section 42A report (shown in black) and draft supplementary evidence (shown in red).
[3] NB green is used either in ~~strikethrough~~ or underlining to represent amendments to the background document version sought by Contact.

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4.	**Over-allocation**	31	has the same meaning as in clause 1.4 of the National Policy Statement for Freshwater Management 2020 (as set out in the box below) 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	Contact **supports** this definition as it is consistent with the National Policy Statement.	No changes requested.
		6-7	Same as above.		
5.	**Specified infrastructure**	36	has the same meaning as in clause 3.21 of the National Policy Statement for Freshwater Management 2020 (as set out in the box below) means any of the following: (a) infrastructure that delivers a service operated by a lifeline utility (as defined in the Civil Defence Emergency Management Act 2002), (b) regionally significant infrastructure identified as such in a regional policy statement or regional plan, (c) any public flood control, flood protection, or drainage works carried out: (i) by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1951, or (ii) for the purpose of drainage by drainage districts under the Land Drainage Act 1908	Contact **supports** this definition as it is consistent with the National Policy Statement.	No changes requested.
		6 187	Same as above.		
6.	**Specified rivers and lakes**	37	has the same meaning as in Appendix 3 of the National Policy Statement for Freshwater Management 2020 (as set out in the box below) 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	Contact **supports** this definition as it is consistent with the National Policy Statement.	No changes requested.
		6	Same as above.		

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7.	**Wetland utility structure**	42	has the same meaning as in regulation 3 of the National Environmental Standard for Freshwater 2020 (as set out in the box below) (a) means a structure placed in or adjacent to a wetland whose purpose, in relation to the wetland, is recreation, education, conservation, restoration, or monitoring, and (b) for example, includes the following structures that are placed in or adjacent to a wetland for a purpose described in paragraph (a): (i) jetties (ii) boardwalks and bridges connecting them, (i) walking tracks and bridges connecting them, (ii) signs, (iii) bird-watching hides, (iv) monitoring devices, (v) maimai	Contact **supports** this definition as it is consistent with the National Environmental Standard.	No changes requested.
		6	Same as above.		
	SRMR				
8.	**SRMR-I5**	75	**SRMR–I5 – Freshwater demand exceeds capacity in some places** **Statement** In water-short catchments, freshwater availability may not be able to meet competing demands from the health and well-being needs of the environment, the health and well-being needs of people, and the ability of people and communities to provide for their social, economic and cultural well-being. Many of these catchments are also experiencing urban growth, changes in rural land uses, and increased demand for hydro-electric generation. Individually and cumulatively these can alter demand including further increases in demand on freshwater supply. Some catchments are complex, making it challenging to identify or mitigate these effects. **Context** Freshwater, including rivers and streams, lakes, groundwater systems, and wetlands, is a finite resource, critical to the environment, society and the economy. In Otago, access to, allocation, and use of freshwater reflects current demands and historical development associated with "deemed permits" (water permits under the RMA 1991) and a permissive	**Support with amendments**. Contact generally agrees with the originally notified version of SRMR-I5 but seeks amendments to appropriately recognise the critical importance of freshwater in supporting hydroelectric (renewable) power schemes, which form a core part of climate change mitigation, and are therefore an essential part of protecting the environment as well as providing for the economic and social wellbeing of people and communities. This change is also required to give effect to the NPSREG. In addition, Contact does not agree with some of the amendments to the context section set out in the background version because they appear to inappropriately pre-empt or redefine the approach to Te Mana o Te Wai provided for in the National Policy Statement.	Contact seeks that the issue statement is amended to appropriately recognise the critical importance of renewable electricity generation to achieving New Zealand's emission reduction targets; and to more appropriately recognise the directions within the NPSFM and NPSREG. Suggested amendments to the background document version are set out below, by way of example: **SRMR–I5 – Freshwater demand exceeds capacity in some places** **Statement** ... **Context** Freshwater, including rivers and streams, lakes, groundwater systems, and wetlands, is a finite resource, critical to the environment, society and the economy. In Otago, access to, allocation, and use of freshwater reflects current demands and historical development associated with "deemed permits" (water permits under the RMA 1991) and a permissive water resource management regime. The deemed permits originated from mining licences issued

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			water resource management regime. The deemed permits originated from mining licences issued under historic mining legislation and which enable water to continue to be used for a range of uses until October 2021. Population growth and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social and cultural needs. On 3 September 2020, new National Environmental Standards for Freshwater (NESF) and a new National Policy Statement for Freshwater Management (NPSFM) came into force. They have a goal of improving freshwater quality within five years, reversing past damage and bringing New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation. The NPS-FM also clarified the need to provide first for the health and well-being of water bodies and freshwater ecosystems; then health and needs of people (such as drinking water); and finally the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. **Impact snapshot** Environmental Freshwater abstraction can reduce water level or flow and connections between different water bodies. This can negatively impact ecosystems by affecting freshwater habitat size and the shape and condition of the water body, including bed, banks, margin, riparian vegetation, connections to groundwater, water chemistry (for example by increasing concentrations of pollutants), and interaction between species and their habitat. How much an ecosystem is affected by taking freshwater is determined by departure from natural flow regimes, taking into account magnitude, frequency, timing, duration and rate of change, and ecosystem capacity to recover. **Economic**		under historic mining legislation and which enable water to continue to be used for a range of uses until October 2021. Population growth and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to ~~achieve a balance of~~ ~~prioritise protection of the mauri of water bodies, meet the health needs of people, and provide for~~ ~~economic, environmental, social and cultural needs~~ ~~well-being~~ recognise Te Mana o te Wai, including protecting the health and mauri of freshwater; and restoring the balance between the water, the wider environment and the community. On 3 September 2020, new National Environmental Standards for Freshwater (NESF) and a new National Policy Statement for Freshwater Management (NPSFM) came into force. They have a goal of improving freshwater quality within five years, reversing past ~~damage~~ degradation and bringing New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation. The NPS-FM also clarified the need to provide first for the health and well-being of water bodies and freshwater ecosystems; then health and needs of people (such as drinking water); and finally the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. ... **Impact snapshot** ... **Economic** ... **Social** ... **Climate change and renewable electricity generation**

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			Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture (including irrigation), hydro-electric power supply, and mineral extraction. Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. At the same time other industries, such as tourism that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities. **Social** Ensuring appropriate freshwater supply for human use is available as part of planned urban growth is essential. It is possible this may require consideration of additional freshwater storage in the future. The region's freshwater assets also support a range of recreation uses, for example camping, fishing, water sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values.		Protecting and maximising the generation capacity, storage, and operational flexibility of the Clutha Hydro Scheme is essential to climate change mitigation, which in turn is an essential part of protecting the environment as well as providing for the economic and social wellbeing of people and communities. Providing for the development, operation, maintenance, and upgrading of new and existing hydro-electricity generation is also required to give effect to the NPSREG.
		17 19	**SRMR–I5 – Freshwater demand exceeds capacity in some places** **Statement** In water-short catchments, freshwater availability may not be able to meet competing demands from the health and well-being needs of the environment, the health and well-being needs of people, and the ability of people and communities to provide for their social, economic and cultural well-being. Many of these catchments are also experiencing urban growth, changes in rural land uses, and increased demand for hydro-electric generation. Individually and cumulatively these can alter demand including further increases in demand on freshwater supply. Some catchments are complex, making it challenging to identify or mitigate these effects.		

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			Context Freshwater, including rivers and streams, lakes, groundwater systems, and wetlands, is a finite resource, critical to the environment, society and the economy. In Otago, access to, allocation, and use of freshwater reflects current demands and historical development associated with "deemed permits" (water permits under the RMA 1991) and a permissive water resource management regime. The deemed permits originated from mining licences issued under historic mining legislation and which enable water to continue to be used for a range of uses until October 2021. Population growth and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to ~~achieve a balance of~~ prioritise protection of the mauri of water bodies, meet the health needs of people, and provide for economic, environmental, social and cultural ~~needs~~ well-being. On 3 September 2020, new National Environmental Standards for Freshwater (NESF) and a new National Policy Statement for Freshwater Management (NPSFM) came into force. They have a goal of improving freshwater quality within five years, reversing past ~~damage~~ degradation and bringing New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation. The NPS-FM also clarified the need to provide first for the health and well-being of water bodies and freshwater ecosystems; then health and needs of people (such as drinking water); and finally the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. **Impact snapshot** Environmental Freshwater abstraction can reduce water level or flow and connections between different water bodies. This can negatively impact ecosystems by affecting freshwater habitat size and the shape and condition of the water body, including bed,		

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			banks, margin, riparian vegetation, connections to groundwater, water chemistry (for example by increasing concentrations of pollutants), and interaction between species and their habitat. How much an ecosystem is affected by taking freshwater is determined by departure from natural flow regimes, taking into account magnitude, frequency, timing, duration and rate of change, and ecosystem capacity to recover. **Economic** Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture industry (including irrigation), hydro-electric power supply, and mineral extraction. Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. At the same time other industries, such as tourism that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities. **Social** Ensuring appropriate freshwater supply for human use is ~~available~~ essential, including as part of planned urban growth ~~is essential~~. It is possible this may require consideration of additional freshwater storage in the future. The region's freshwater assets also support ~~a range of recreation uses, for example camping, fishing, water sports, and swimming. These values are strongly linked to~~ environmental, human health and well-being, landscape and aesthetic values, ~~and as such, r~~. Reduced environmental flows have a corresponding negative impact on social and cultural values~~:~~ and people's wellbeing.		
9.	**SRMR-I6**	76	**SRMR–I6 – Declining water quality has adverse effects on the environment, our communities, and the economy** **Statement**	Contact **supports** the proposed issue statement, including as amended in the background document version.	No changes requested.

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			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 from land use intensification (both rural and urban) and land management practices. Erosion, run-off and soil loss can lead to sediment and nutrients being deposited into freshwater bodies resulting in declining water quality. **Context** The health of water is vital for the health of the environment, people and the economy. It is at the heart of culture and identity. Nationally, and in parts of Otago, freshwater is facing significant pressure. Population growth and land-use intensification in urban and rural environments has impacted the quality of water, increasing contamination from nutrients and sediment. Water quality affects a wide range of environmental health factors, human survival needs, and cultural, social, recreational, and economic uses. Some of the biggest impacts on water quality in Otago are considered to come from agriculture and urbanisation, through diffuse discharges and point source discharges. On 3 September 2020, new National Environmental Standards (NESF) and a new National Policy Statement (NPSFM) came into force to improve water quality within five years; and reverse past damage and bring New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation. **Impact snapshot** **Environmental** Despite the region's lakes and rivers being highly valued by Otago communities, reports indicate there are reasons for concern about water quality and its trends with consequent potential impact on ecosystems and people. Water quality across Otago is variable. River water quality is best at river and stream reaches located at high or mountainous elevations under predominantly native vegetation cover, and mostly good in the upper areas of large river catchment and outlets from large lakes. Water quality is generally poorer in		

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			smaller low-elevation streams and coastal shallow lakes where they receive water from upstream pastoral areas or urban catchments. For example, catchments such as the Waiareka Creek, Kaikorai Stream, and the lower Clutha catchment, have some of the worst water quality in the region; Otago's central lakes are impacted by increased population, urban development and tourism demand; other areas, such as urban streams in Dunedin, intensified catchments in North Otago and some tributaries, also have poor water quality. Between 2006 and 2017, trends in a number of water quality parameters were worsening. For E. coli, for example, 30% of sites had a probable or significant worsening trend compared to 7% of sites that had either stable or improving trends. In urban streams in Dunedin, intensified catchments in North Otago and some tributaries of the Pomahaka, E. coli was the worst performing variable. In many cases, the specific source of contamination is unknown. There are many different types and sizes of lakes in Otago. ORC monitors water quality in lakes, of which eight have generally shown good water quality. There have been concerns within the community about the quality of water in Lakes Wānaka, Wakatipu and Hayes. Groundwater quality also varies across the region, with some areas having elevated E. coli and nitrate concentrations above the NZ Drinking Water Standards. The main areas with elevated nitrate concentrations are North Otago and the Lower Clutha. Some bores across the region have exceeded the drinking water standards for E. coli; highlighting localized problems, likely due to inadequate bore head security. In addition to human sources of poorer groundwater quality, low groundwater quality from natural or geologic sources may also affect the potability of bore water throughout Otago (e.g. naturally occurring arsenic or boron concentrations found in bores associated with particularly geologies). Stock entering water bodies can lead to pugging and destruction of riparian soils and beds that play an important role in filtering contaminants, as well as excreting directly in waterways. The growing practice of wintering cattle in Otago can exacerbate leaching		

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			effects, which may not connect to surface water until spring, creating spikes in nutrient loads. Sediment is a key issue for freshwater quality throughout Otago, including coastal estuaries where it can significantly impact the life supporting capacity of waterways. Urban development is a key generator of sediment input to lakes and rivers in Central Otago, from building platforms and from stormwater contamination. Activities such as agricultural intensification, mining, and forestry also contribute. Agricultural intensification also contributes to nutrients (nitrogen and phosphorus) leaching into underlying groundwater or running off into surface water bodies, and can also increase the risk of E.coli contamination from animal waste. Urban environmental contaminants include hydrocarbons, and metals from roads and structures. They often wash into urban stormwater systems and pass unfiltered into water bodies, or the coastal marine area. Stormwater effects, particularly in urban areas, are poorly understood. Wastewater and stormwater systems may not be adequate in some places due to aging infrastructure, rapid growth pressure, or insufficient investment in replacement or upgrades. Overflows of wastewater (sewage and waste products) create significant risks for water quality. These can enter the environment either directly or through stormwater systems, particularly in flood events. **Economic** Water pollution (from nutrients, chemicals, pathogens and sediment) can have far-reaching effects potentially impacting tourism, property values, commercial fishing, recreational businesses, and many other sectors that depend on clean water. These impacts can be direct (varying the quality of primary production outputs such as fish); increasing costs of production through mitigation or remediation costs (drinking water treatment cost, riparian restoration); loss of enjoyment and benefit from tourism uses, and indirect such as cost to human health and associated medical costs, or reduction in brand value (e.g. Brand New Zealand). **Social**		

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			For the wider community, water is a source of kai and of recreation, including swimming, fishing and water sports. Otago's rivers, lakes, estuaries and bays are important destinations for recreational use including swimming, fishing and water sports. Eighty-two per cent of Otago's rivers and lakes are swimmable. Where water quality cannot support these activities, the lifestyle of those living in Otago is impacted. Degraded water quality reduces the mauri of the water and the habitats and species it supports, therefore also negatively affecting mahika kai and taoka species and places. This constitutes a loss of Kāi Tahu culture, affecting the intergenerational transfer of knowledge handed down from tūpuna over hundreds of years; and it culminates in a loss of rakatirataka and mana.		
		34 36	**SRMR–I6 – Declining water quality has adverse effects on the environment, our communities, and the economy** **Statement** While the pristine areas of Otago generally maintain very good water quality, some areas of Otago demonstrate poorer quality and declining trends in water quality which can be attributed to discharges from land use intensification (both rural and urban) and land management practices. Erosion, run-off and soil loss can lead to sediment and nutrients being deposited into freshwater bodies resulting in declining water quality. **Context** The health of water is vital for the health of the environment, people and the economy. It is at the heart of culture and identity. Nationally, and in parts of Otago, freshwater is facing significant pressure. Population growth and land-use intensification in urban and rural environments has impacted the quality of water, increasing contamination from nutrients and sediment. Water quality affects a wide range of environmental health factors, human health and survival needs, and cultural, social, recreational, and economic uses. Some of the biggest adverse impacts on water quality in Otago are considered to come from agriculture and urbanisation, through diffuse discharges and point source discharges.		

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			On 3 September 2020, a new ~~N~~national ~~E~~environmental ~~S~~standard~~s~~ (NESF) and a new ~~N~~national ~~P~~policy ~~S~~statement (NPSFM) came into force to improve water quality within five years; and reverse past ~~damage~~ degradation and bring New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation. **Impact snapshot** **Environmental** Despite the region's lakes and rivers being highly valued by Otago communities, reports indicate that in some areas there are reasons for concern about water quality and its trends with consequent potential impact on ecosystems and people. Water quality across Otago is variable. River water quality is best at river and stream reaches located at high or mountainous elevations under predominantly native vegetation cover, and mostly good in the upper areas of large river catchment and outlets from large lakes. Water quality is generally poorer in smaller low-elevation streams and coastal shallow lakes where they receive water from upstream pastoral areas or urban catchments. For example, catchments such as the Waiareka Creek, Kaikorai Stream, and the lower Clutha catchment, have some of the worst water quality in the region; Otago's central lakes are impacted by increased population, urban development and tourism demand; other areas, such as urban streams in Dunedin, intensified catchments in North Otago and some tributaries, also have poor water quality. Between 2006 and 2017, trends in a number of water quality parameters were worsening. For E. coli, for example, 30% of sites had a probable or significant worsening trend compared to 7% of sites that had either stable or improving trends. In urban streams in Dunedin, intensified catchments in North Otago and some tributaries of the Pomahaka, E. coli was the worst performing variable. In many cases, the specific source of contamination is unknown. There are many different types and sizes of lakes in Otago. ORC monitors water quality in lakes, of which eight have generally shown good water quality. There have been concerns within the community about the quality of water in Lakes Wānaka, Wakatipu and Hayes.		

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			Groundwater quality also varies across the region, with some areas having elevated E. coli and nitrate concentrations above the NZ Drinking Water Standards. The main areas with elevated nitrate concentrations are North Otago and the Lower Clutha. Some bores across the region have exceeded the drinking water standards for E. coli; highlighting localized problems, likely due to inadequate bore head security. In addition to human sources of poorer groundwater quality, low groundwater quality from natural or geologic sources may also affect the potability of bore water throughout Otago (e.g. naturally occurring arsenic or boron concentrations found in bores associated with particularly geologies). Stock entering water bodies can lead to pugging and destruction of riparian soils and beds that play an important role in filtering contaminants, as well as excreting directly in waterways. The growing practice of wintering cattle in Otago can exacerbate leaching effects, which may not connect to surface water until spring, creating spikes in nutrient loads. Sediment is a key issue for freshwater quality throughout Otago, including coastal estuaries where it can significantly impact the life supporting capacity of waterways. Urban development is a key generator of sediment input to lakes and rivers in Central Otago, from building platforms and from stormwater contamination. Activities such as agricultural land use ~~intensification~~, mining, and forestry also contribute. Agricultural land use ~~intensification~~ also contributes to nutrients (nitrogen and phosphorus) leaching into underlying groundwater or running off into surface water bodies, and agriculture intensification can also increase the risk of E.coli contamination from animal waste. Urban environmental contaminants include hydrocarbons, and metals from roads and structures. They often wash into urban stormwater systems and pass unfiltered into water bodies, or the coastal marine area. Stormwater effects, particularly in urban areas, are poorly understood. Wastewater and stormwater systems may not be adequate in some places due to aging infrastructure, rapid growth pressure, or insufficient investment in replacement or upgrades. Overflows of wastewater (sewage and waste products) create significant risks for water quality. These can enter the environment either		

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			directly or through stormwater systems, particularly in flood events. **Economic** Water pollution (from nutrients, chemicals, pathogens and sediment) can have far-reaching effects potentially impacting tourism, property values, commercial fishing, recreational businesses, and many other sectors that depend on clean water. These impacts can be direct (varying the quality of primary production outputs such as fish); increasing costs of production through mitigation or remediation costs (drinking water treatment cost, riparian restoration); loss of enjoyment and benefit from tourism uses, and indirect such as cost to human health and associated medical costs, or reduction in brand value (e.g. Brand New Zealand). **Social** ~~For the wider community, water is a source of kai and of recreation, including swimming, fishing and water sports.~~ Otago's rivers, lakes, estuaries and bays are important destinations for recreational use including swimming, fishing and water sports. Eighty-two per cent of Otago's rivers and lakes are swimmable. Water is also a source of kai. Where water quality cannot support these activities, the health and wellbeing ~~lifestyle~~ of those living in Otago and their interaction with water is impacted. Degraded water quality reduces the mauri of the water and the habitats and species it supports, therefore also negatively affecting mahika kai and taoka species and places. This constitutes a loss of Kāi Tahu culture, affecting the intergenerational transfer of knowledge handed down from tūpuna over hundreds of years; and it culminates in a ~~loss~~ diminishing of ~~rakatirataka and~~ mana.		
10.	**SRMR-I9**	82	**SRMR–I9 – Otago lakes are subject to pressures from tourism and population growth** **Statement** The beauty, recreational opportunities and regional climate of Lakes Wanaka, Wakatipu, Hāwea and Dunstan and their environs attract visitors and residents from around the region, the country and the world. This influx brings economic opportunity, but the activities and services created to take advantage	**Support with amendment** Contact generally supports this issue statement insofar as it recognises that the Otago lakes area provides significant renewable energy for use in Otago and beyond, and that access to such water is necessary for these purposes. Contact is, however, concerned that there are broad statements such as "natural features and landscape values are also adversely impacted by…energy	Contact seeks amendments to address its concerns. Suggested amendments are set out below by way of example: **SRMR-I9 – Otago lakes are subject to pressures from tourism and population growth** **Statement** The beauty, recreational opportunities and regional climate of Lakes Wanaka, Wakatipu, Hāwea and

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			of it can degrade the environment and undermine the experience that underpins their attractiveness. **Context** Healthy lakes are one of Otago's most valued natural resources and for the most part water quality is good. The values assigned to lakes include the natural features and landscapes, the quality and quantity of water accessible to the Otago communities, the accessibility of these resources for recreation, the health of native flora and fauna associated with Otago's rivers and lakes, and renewable energy production. Urban growth is adversely affecting the natural features and landscapes around the lakes. The amount of growth is demonstrated in the Queenstown Lakes District, including Queenstown and Wanaka, where the population tripled in the last 20 years from 16,750 in 1999 to 47,400 in 2020. Continued growth is projected over the 30 years from 2020 to 2050 (by 63%). This desire of New Zealanders and international visitors to enjoy the outstanding natural environments of the Otago lakes has placed significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. At the same time the economy of the Otago lakes area is heavily dependent on tourism. For example in 2020, tourism employment accounted for an estimated 56% (or 17,758) of the jobs in the Queenstown-Lakes district; tourism GDP accounted for 43.7% (or NZ $1.7 billion) of the district's GDP and international tourism contributed 64% (or NZ $1.89 billion). The Otago-Lakes area also supplies significant renewable energy for use in Otago and beyond. **Impact snapshot** **Environmental** Population pressures arising from urban development, and tourism population pressures are impacting on the environment. Lake Wanaka, Lake Hāwea, and Lake Wakatipu, as well as the Kawarau River and upper reaches of the Clutha Mata-au and Taieri Rivers all have good water quality which equates to the "A" band (being top/best level) for the National Objectives Framework.	production" and "[energy production]…puts at risk the environment highly prized by residents and visitors". There is no acknowledgement within this issue statement for instance, that Te Wairere / Lake Dunstan was artificially created for energy production purposes and that this has been influential in the development of the surrounding area as result. There is also no acknowledgement within the statement that from an environmental perspective, hydro development and other renewable energy resources have enormous positive effects on the environment (e.g. providing low cost, secure and renewable energy; decarbonisation), and can become visitor attractions themselves. Finally, there is no acknowledgement that the Clutha Hydro Scheme, linked to all these lakes, generates around 12% of Aotearoa New Zealand's total renewable electricity generation, is nationally significant and is critical to ensuring our climate change emission reduction commitments are delivered and our economy is decarbonised (and in the process enabling sustainable tourism and industry in the region). Contact seeks amendments to recognise that many of these lakes are created by and play a critical role in the Clutha Hydro Scheme, which is recognised (including by the National Policy Statement for Freshwater Management) as nationally significant infrastructure, which contributes to meeting New Zealand's greenhouse gas emission targets and maintaining the security of New Zealand's electricity supply. Contact also requests that references to "renewable energy production" are replaced with "renewable electricity generation (activities)", which is more accurate. Contact also requests that Lakes Hāwea and Wānaka are macronised; and references to Lake Dunstan are replaced with "Te Wairere / Lake Dunstan" throughout the pORPS.	Dunstan and their environs attract visitors and residents from around the region, the country and the world. This influx brings economic opportunity, but the activities and services created to take advantage of it can degrade the environment and undermine the experience that underpins their attractiveness. Lake Hāwea, Te Wairere / Lake Dunstan and Lake Roxburgh play a critical role in the Clutha Hydro Scheme, which is recognised by the National Policy Statement for Freshwater Management as making an important contribution to meeting New Zealand's greenhouse gas emission targets; and maintaining the security of New Zealand's electricity supply. It is therefore important that the contribution of these lakes to the Clutha Hydro Scheme is safeguarded. **Context** Healthy lakes are one of Otago's most valued natural resources and for the most part water quality is good. The values assigned to lakes include the natural features and landscapes, the quality and quantity of water accessible to the Otago communities, the accessibility of these resources for recreation and transport, the health of native flora and fauna associated with Otago's rivers and lakes, and the nationally significant contribution of these lakes to renewable ~~energy production~~ electricity generation activities and the decarbonisation of the region (including its businesses and tourism), and nation's, economy. It is also recognised that Te Wairere / Like Dunstan and Lake Roxburgh were created by the dams associated with the Clutha Hydro Scheme, and Lake Hāwea is a modified and significant hydro-storage lake, and the Scheme is a key contributing factor to the characters of these lakes. Urban growth is adversely affecting the natural features and landscapes around the lakes. The amount of growth is demonstrated in the Queenstown Lakes District, including Queenstown and Wanaka, where the population tripled in the last 20 years from 16,750 in 1999 to 47,400 in 2020. Continued growth is projected over the 30 years from 2020 to 2050 (by 63%). This desire of New Zealanders and international visitors to enjoy the outstanding natural

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			However, water quality is being adversely impacted by increased population, urban development and tourism demand which is straining existing waste management infrastructure. In addition, localised degradation of some areas is occurring due to overuse and unregulated use (e.g. freedom camping). The amenity of these areas is being compromised in some places by over-crowding. Recreation use impacts on the environment can be a risk, for example the distribution of pest species can be accelerated as has occurred for lake snow and Lagarosiphon weeds being spread by recreation boating movements. Natural features and landscape values are also adversely impacted by tourism and urban growth, and energy production. **Economic** The economic benefits of urban development, tourism, agriculture, energy production and water supply can be positive for the Otago-Lakes' communities and visitors. It also impacts on the region's natural assets with a growing cost to the region that puts at risk the environment highly prized by residents and visitors. There are also impacts between industry sectors. For example, the clean green image of New Zealand, of which the Otago Lakes area is symbolic, is at risk of being compromised because of over-crowding in peak tourism seasons. This has the potential to adversely affect the existing regional economy and future economic development; and the tourism industry's social licence to operate. At the same time tourism can negatively impact on how agriculture can operate, potentially limiting its contribution to the regional economy. Urban development brings economic development and improved opportunities and standards of living to the Otago lakes area but can adversely impact on both the environment and how agriculture can operate. **Social** Over-crowding impacts adversely affect recreation experiences of both tourists and residents, such as fishing and water sports, and urban amenity. Infrastructure capacity limits can, for example, result in an increased number of wastewater overflows to the environment when demand on the network		environments of the Otago lakes has placed significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. At the same time the economy of the Otago lakes area is heavily dependent on tourism. For example in 2020, tourism employment accounted for an estimated 56% (or 17,758) of the jobs in the Queenstown-Lakes district; tourism GDP accounted for 43.7% (or NZ $1.7 billion) of the district's GDP and international tourism contributed 64% (or NZ $1.89 billion). The Otago-Lakes area also supplies significant renewable ~~energy~~ electricity generation for use in Otago and beyond. **Impact snapshot** **Environmental** Population pressures arising from urban development, and tourism population pressures are impacting on the environment. Lake Wanaka, Lake Hāwea, and Lake Wakatipu, as well as the Kawarau River and upper reaches of the Clutha Mata-au and Taieri Rivers all have good water quality which equates to the "A" band (being top/best level) for the National Objectives Framework. However, water quality is being adversely impacted by increased population, urban development and tourism demand which is straining existing waste management infrastructure. In addition, localised degradation of some areas is occurring due to overuse and unregulated use (e.g. freedom camping). The amenity of these areas is being compromised in some places by over-crowding. Recreation use impacts on the environment can be a risk, for example the distribution of pest species can be accelerated as has occurred for lake snow and Lagarosiphon weeds being spread by recreation boating movements. Natural features and landscape values ~~are also~~ can be adversely impacted by tourism and urban growth, and energy production. **Economic** The economic benefits of urban development, tourism, ~~agriculture~~ primary production, ~~energy production~~ renewable electricity generation and water supply can be positive for the Otago-Lakes' communities and visitors. It also impacts on the region's natural assets with a growing cost to the region that puts at risk the environment highly prized

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			exceeds capacity. These can have significant adverse impacts on human health as well as recreational amenity.		by residents and visitors. There are also impacts between industry sectors. Renewable electricity generation provides a significant opportunity for local and regional business to compete sustainably on national and global markets and to attract, and maintain, tourism. ... **Social** ...
		40	**SRMR-I9 – Otago lakes are subject to pressures from tourism and population growth** **Statement** The beauty, recreational opportunities and regional climate of Lakes Wanaka, Wakatipu, Hāwea and Dunstan and their environs attract visitors and residents from around the region, the country and the world. This influx brings economic opportunity, but the activities and services created to take advantage of it can degrade the environment and undermine the experience that underpins their attractiveness. **Context** Healthy lakes are one of Otago's most valued natural resources and for the most part water quality is good. The values assigned to lakes include the natural features and landscapes, the quality and quantity of water accessible to the Otago communities, the accessibility of these resources for recreation and transport, the health of native flora and fauna associated with Otago's rivers and lakes, and renewable energy production. Urban growth is adversely affecting the natural features and landscapes around the lakes. The amount of growth is demonstrated in the Queenstown Lakes District, including Queenstown and Wanaka, where the population tripled in the last 20 years from 16,750 in 1999 to 47,400 in 2020. Continued growth is projected over the 30 years from 2020 to 2050 (by 63%). This desire of New Zealanders and international visitors to enjoy the outstanding natural environments of the Otago lakes has placed significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. At the same time the economy of the Otago lakes area is heavily dependent on tourism. For example in 2020, tourism employment accounted for an estimated 56% (or 17,758) of the jobs in the Queenstown-Lakes district; tourism GDP accounted for 43.7% (or NZ $1.7 billion) of the district's GDP and international tourism contributed 64% (or NZ $1.89		

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			billion). The Otago-Lakes area also supplies significant renewable energy for use in Otago and beyond. **Impact snapshot** **Environmental** Population pressures arising from urban development, and tourism population pressures are impacting on the environment. Lake Wanaka, Lake Hāwea, and Lake Wakatipu, as well as the Kawarau River and upper reaches of the Clutha Mata-au and Taieri Rivers all have good water quality which equates to the "A" band (being top/best level) for the National Objectives Framework. However, water quality is being adversely impacted by increased population, urban development and tourism demand which is straining existing waste management infrastructure. In addition, localised degradation of some areas is occurring due to overuse and unregulated use (e.g. freedom camping). The amenity of these areas is being compromised in some places by over-crowding. Recreation use impacts on the environment can be a risk, for example the distribution of pest species can be accelerated as has occurred for lake snow and Lagarosiphon weeds being spread by recreation boating movements. Natural features and landscape values are also adversely impacted by tourism and urban growth, and energy production. **Economic** The economic benefits of urban development, tourism, ~~agriculture~~ primary production, energy production and water supply can be positive for the Otago-Lakes' communities and visitors. It also impacts on the region's natural assets with a growing cost to the region that puts at risk the environment highly prized by residents and visitors. There are also impacts between industry sectors. For example, the clean green image of New Zealand, of which the Otago Lakes area is symbolic, is at risk of being compromised if the quality of lakes becomes degraded or visitor numbers exceed the servicing capacity of the district~~because of over-crowding in peak tourism seasons~~. This has the potential to adversely affect the existing regional economy and future economic development; and the tourism industry's social licence to operate. At the same time		

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			tourism can negatively impact on how ~~agriculture~~ primary production can operate, potentially limiting its contribution to the regional economy. Urban development brings economic development and improved opportunities and standards of living to the Otago lakes area but can adversely impact on both the environment and how agriculture can operate. **Social** Poorly managed activities and o~~O~~ver-crowding impacts can adversely affect recreation experiences of both tourists and residents, such as fishing and water sports, and urban amenity. Infrastructure capacity limits can, for example, result in an increased number of wastewater overflows to the environment when demand on the network exceeds capacity. These can have significant adverse impacts on human health as well as recreational amenity.		
	RMIA-WAI				
11.	**RMIA-WAI-I1** **RMIA-WAI-I3**	87 41 88 42	**RMIA–WAI–I1 – The loss and degradation of water resources through drainage, abstraction, pollution, and damming has resulted in material and cultural deprivation for Kāi Tahu ki Otago** The drainage of wetlands, water abstraction, degraded water quality, barriers to fish passage and changes to flow regimes as a result of damming have had significant negative impacts on Kāi Tahu. These activities degrade the mauri of the water and the habitats and species it supports, therefore also degrading mahika kai and taoka species and places. These changes to the environment have meant that Kāi Tahu have had to adapt and change their use of the environment. As traditional mahika kai places and species have declined, mahika kai must now be carried out in artificial habitats such as reservoirs, and whānau have had to switch to exotic species such as trout and salmon. The mātauraka associated with traditional mahika kai species and places cannot be passed on, and the intergenerational transfer of knowledge that has occurred for over 800 years is broken. Place names that carry tribal history are no longer reflective of their places – for example no one would now claim that the Waiareka is 'sweet water' to drink.	Contact accepts these issue statements as statements of the relevant issues for Kāi Tahu ki Otago; and **supports** them.	No changes sought.

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			(No change) **RMIA–WAI–I3 – The effects of land and water use activities on freshwater habitats have resulted in adverse effects on the diversity and abundance of mahika kai resources and harvesting activity** Mahika kai is the gathering of foods and other resources, the places where they are gathered, and the practices used in doing so. Mahika kai is an intrinsic part of Kāi Tahu identity and economic well-being. Kāi Tahu fishing rights were explicitly protected by the Treaty of Waitangi. Not only was the right to engage in mahika kai activity confirmed, so too was the expectation that such activity will continue to be successful as measured by reference to past practice. However, as described in evidence provided to the Waitangi Tribunal in the Ngāi Tahu claim, there has been a dramatic loss of mahika kai resources and places of procurement since the Treaty was signed. This loss is greater than the loss of kai. It is a loss of Kāi Tahu culture, as it affects the intergenerational transfer of mātauraka handed down from tūpuna over hundreds of years. It represents a loss of rakatirataka and of mana. Mahika kai continues to be degraded through the effects of land and water use activities on freshwater habitats. Activities such as the construction of barriers to fish passage, drainage, altered flow regimes, reduced water quality and removal of riparian vegetation all impact on access to and use of resources.		
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			was signed. This loss is greater than the loss of kai. It is a loss of Kāi Tahu culture, as it affects the intergenerational transfer of mātauraka handed down from tūpuna over hundreds of years. It represents a significant loss ~~of rakatirataka and~~ for mana whenua and a diminishing of mana. Mahika kai continues to be degraded through the effects of land and water use activities on freshwater habitats. Activities such as the construction of barriers to fish passage, drainage, altered flow regimes, reduced water quality and removal of riparian vegetation all impact on access to and use of resources.		
	LF – WAI				
12.	**LF-WAI-O1**	122 48	**LF–WAI–O1 – Te Mana o te Wai** 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: (1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future, (3) each water body has a unique whakapapa and characteristics, (4) water and land have a connectedness that supports and perpetuates life, and (5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports. **LF–WAI–O1 – Te Mana o te Wai** The mauri of Otago's water bodies and their health and well-being is protected, and restored ~~improved~~ where it is degraded, and the management of land and water recognises and reflects that: (1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future, (3) each water body has a unique whakapapa and characteristics,	**Support with amendments** Contact supports the intent of this provision but seeks amendments to ensure that it gives effect to the National Policy Statement for Freshwater Management. In particular, the proposed objective does not capture the concept of balance within paragraph (1) of section 1.3 of the NPSFM *"restoring and preserving the balance between the water, the wider environment, and the community"* Further, the wording of the provision appears to go beyond an objective and include matters more relevant for policies.	Contact seeks amendments to ensure that the objective gives effect to the NPSFM; and to ensure that it is more appropriately drafted as an objective, rather than a list of policies. By way of an example, Contact proposes the following amendments (using the background document version as the base text): **LF–WAI–O1 – Te Mana o te Wai** The mauri of Otago's water bodies and their health and well-being is protected, and the balance between the water, the wider environment, and the community is restored and preserved.~~, improved where it is degraded, and the management of land and water recognises and reflects that:~~ ~~(1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa,~~ ~~(2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future,~~ ~~(3) each water body has a unique whakapapa and characteristics,~~ ~~(4) fresh water, and land and coastal water have a connectedness that supports and perpetuates life, and~~ ~~(4A) protecting the health and well-being of water protects the wider environment and the mauri of water,~~ ~~(5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports and~~

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			(4) fresh water~~.~~ ~~and~~ land and coastal water have a connectedness that supports and perpetuates life, ~~and~~ (4A) protecting the health and well-being of water protects the wider environment and the mauri of water, (5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports and (6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.		~~(6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.~~
13.	**LF-WAI-P1**	122	**LF–WAI–P1 – Prioritisation** In all management of fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these, (2) second, the health and well-being needs of people, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested resources) and immersive activities (such as harvesting resources and bathing), and (3) third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future. **LF–WAI–P1 – Prioritisation** In all ~~management of~~ decision-making affecting fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies, freshwater ecosystems, and te hauora o te wai, ~~and~~ the connections with te hauora o te taiao, ~~and~~ as well as the exercise of mana whenua to uphold these ~~and provide for te hauora o te taiao~~, (2) second, the health and well-being needs of people~~.~~ (te hauora o te takata ~~tangata)~~,; interacting ~~and their interactions~~ with water through ingestion (such as drinking water and consuming ~~harvested~~ resources harvested from the water body) and immersive activities	**Support with amendment** Climate change will significantly affect the health and wellbeing of freshwater bodies and freshwater ecosystems within Aotearoa New Zealand and the region. Renewable electricity generation is a core component of climate change mitigation. Renewable energy generation, and in the case of the region hydro-electric generation in particular, is also essential to human health and wellbeing. It is vital in delivering basic human needs including life sustaining support and heating of our homes. Renewable electricity generation is also critical to the region's and nation's economy.	Contact seeks that the policy is amended to address Contact's concerns. By way of example only, Contact proposes the following amendments (using the background document version as the base text): **LF–WAI–P1 – Prioritisation** In all ~~management of~~ decision-making affecting fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies, freshwater ecosystems, including their protection from (through emission reduction), and resilience to climate change, and te hauora o te wai, ~~and~~ the connections with te hauora o te taiao, ~~and~~ as well as the exercise of mana whenua to uphold these ~~and provide for te hauora o te taiao~~, (2) second, the health and well-being needs of people~~.~~ (te hauora o te takata), including through ~~tangata,~~;interacting ~~and their interactions~~ with water through ingestion (such as drinking water and consuming ~~harvested~~ resources harvested from the water body), ~~and~~ immersive activities (such as harvesting resources and ~~bathing~~ primary contact) and providing for renewable electricity generation, and (3) third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future.

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			(such as harvesting resources and ~~bathing~~ primary contact), and (3) third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future.		
14.	**LF-WAI-PR1**	124 64	**LF–WAI–PR1 – Principal reasons** 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. ... **LF–WAI–PR1 – Principal reasons** 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 that 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~~ mana whenua in freshwater planning and management. ...	**Support with amendment** Contact supports the general wording of these reasons but seeks amendment to align with the approach to LF-WAI-P1 as referred to above.	By way of example only, Contact proposes the following amendment (using the background document version as the base text): **LF–WAI–PR1 – Principal reasons** 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 that 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 and the health of the people is sustained that water can be used for economic purposes. Giving effect to Te Mana o te Wai requires actively involving ~~takata~~ mana whenua in freshwater planning and management.
15.	**LF-WAI-AER2**	125 66	**LF–WAI–AER2** The mauri of Otago's water bodies and their health and well-being is protected. **LF–WAI–AER2** ~~The mauri of Otago's water bodies and their health and well-being is protected.~~ The mauri and the health and well-being of the environment and people is	**Support with amendment** Contact supports the general wording of this anticipated environmental result but seeks amendment to align with the approach to LF-WAI-P1 as referred to above.	Contact seeks amendments to reflect the approach to LF-WAI-P1 referred to above.

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			protected because the health and wellbeing of Otago's water bodies and their ecosystems are protected and, where degraded, restored.		
	LF – VM				
16.	**LF-VM-O2**	125 85 88	**LF–VM–O2 – Clutha Mata-au FMU vision** In the Clutha Mata-au FMU: (1) management of the FMU recognises that: (a) the Clutha Mata-au is a single connected system ki uta ki tai, and (b) the source of the wai is pure, coming directly from Tawhirimatea to the top of the mauka and into the awa, (2) fresh water is managed in accordance with the LF–WAI objectives and policies, (3) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained, (4) water bodies support thriving mahika kai and Kāi Tahu whānui have access to mahika kai, (5) indigenous species migrate easily and as naturally as possible along and within the river system, (6) the national significance of the Clutha hydro-electricity generation scheme is recognised, (7) in addition to (1) to (6) above: (a) in the Upper Lakes rohe, the high quality waters of the lakes and their tributaries are protected, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community, (b) in the Dunstan, Manuherekia and Roxburgh rohe: (i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and (ii) innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and (iii) sustainable abstraction occurs from main stems or groundwater in preference to tributaries, (c) in the Lower Clutha rohe:	**Support with amendments** Contact operates the Clutha Hydro Scheme within the Clutha Mata-au FMU. The scheme is nationally significant infrastructure, which forms an essential component of New Zealand's electricity generation, and a core component of climate change mitigation. Contact Energy supports the recognition of the Clutha Hydro Scheme within this objective, as well as nearly all the environmental goals outlined in the vision, and in particular, water quality and the relationship of Kāi Tahu with the awa. The Clutha Hydro Scheme (as recognised in the NPSFM) contributes significantly to economic and social wellbeing of all New Zealanders by providing a significant amount of carbon-free, renewable electricity generation. On a more local and regional basis the scheme has provided employment and contributed to the growth and development of the area (e.g. the townships that have developed around the lake edges of Cromwell). It is critical to the decarbonisation of the region and the provision of sustainable tourism. The scheme's hydro lakes also provide/facilitate tourism and recreational activities in the area (e.g. the new cycle track along Lake Dunstan, and boating on the hydro lakes that have been created). Contact Energy is therefore concerned that there appears to be one or two unrealistic requirements within this provision and others of the PORPS to restore 'natural' or 'original' processes which is at odds with the impact the Clutha Hydro Scheme has had. Clause 5 seeks that indigenous species migrate easily and as naturally as possible along and within the river system. Clause 7 seeks that water flows in the Dunstan Rohe, sustain and wherever possible restore the natural form and function of main stem and tributaries to support Kai Tahu values and practices, and these outcomes are to occur by 2045 within the Dunstan Rohe. Not only does such an approach fail to give effect to the NPSREG, it also fails to reflect the reality that	Contact seeks amendments to address its concerns. By way of example only, Contact propose the following amendments (using the background document version as base text): In the Clutha Mata-au FMU: (1) management of the FMU recognises that: (a) the Clutha Mata-au is a single connected system ki uta ki tai, and (b) the source of the wai is pure, coming directly from ~~Tawhirimatea~~ Tāwhiritmātea to the top of the mauka and into the awa, (2) fresh water is managed in accordance with the LF–WAI objectives and policies, (3) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained and connections with wāhi tupuna are re-established where these have been degraded or lost~~, restored~~, (4) water bodies support thriving ~~mahika kai~~ *mahika kai* that are safe for consumption and Kāi Tahu whānui have access to ~~mahika kai~~ *mahika kai*, (5) indigenous species migrate easily and as naturally as ~~possible~~ practicable along and within the river system, (5A) the ecosystem connections between freshwater, wetlands, and the coastal environment are preserved and, wherever ~~possible~~ practicable, restored (5B) environmental flows and levels in water bodies sustain, and wherever ~~possible~~ practicable, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, (5C) food production in the area is supported by innovative and sustainable land and water management practices that reduce discharges of nutrients and other contaminants to water bodies where required to ensure that they are safe for human contact,

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			(i) there is no further modification of the shape and behaviour of the water bodies and opportunities to restore the natural form and function of water bodies are promoted wherever possible, (ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored, (iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and (iv) there are no direct discharges of wastewater to water bodies, and (8) the outcomes sought in (7) are to be achieved within the following timeframes: (a) by 2030 in the Upper Lakes rohe, (b) by 2045 in the Dunstan, Roxburgh and Lower Clutha rohe, and (c) by 2050 in the Manuherekia rohe.	while the dams were put in place to operate efficiently over a very long intergenerational timeframe this 'run of river' scheme has significantly altered the natural form and function of parts of the awa, including interfering with the natural migration of native fish species. Contact facilitates the passage of tuna and kanakana both up and down the Clutha Mata-Au, but its trap and transfer activities for these species could not be considered 'natural'. While restoration of natural processes and form is a laudable goal, Contact Energy submits that in all cases, particularly with respect to the large-scale hydro dams in Otago, this may not be feasible or a necessary requirement and may result in significant and unforeseen adverse effects on a local, regional and national scale.	(5D) there are no direct discharges of wastewater containing sewage to water bodies, (6) the national significance of the ongoing operation, maintenance and upgrading of the Clutha hydro-electricity generation scheme, including its generation capacity, storage, and operational flexibility and its contribution to climate change mitigation is recognised, provided for, and protected, (7) in addition to (1) to (6) above: (a) in the Upper Lakes rohe, the high quality waters of the lakes and their tributaries are protected, and if degraded are improved, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community, (b) in the Dunstan, Manuherekia and Roxburgh rohe: ~~(i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and~~ ~~(ii) innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and~~ ~~(iii) sustainable abstraction occurs from main stems or groundwater in preference to tributaries,~~ (c) in the Upper Lakes and Lower Clutha rohe: (i) ~~there is no further~~ minimise modification of the shape and behaviour of the water bodies and promote opportunities to restore the natural form and function of water bodies ~~are promoted~~ wherever ~~possible~~ practicable, and ~~(ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored,~~ ~~(iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and~~
			LF–VM–O2 – Clutha Mata-au FMU vision In the Clutha Mata-au FMU: (1) management of the FMU recognises that: (c) the Clutha Mata-au is a single connected system ki uta ki tai, and (d) the source of the wai is pure, coming directly from ~~Tawhirimatea~~ Tāwhiritmātea to the top of the mauka and into the awa, (2) fresh water is managed in accordance with the LF–WAI objectives and policies, (3) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained and connections with wāhi tupuna are re-established where these have been degraded or lost~~, restored~~, (4) water bodies support thriving ~~mahika kai~~ *mahika kai* that are safe for consumption and Kāi Tahu whānui have access to ~~mahika kai~~ *mahika kai*, (5) indigenous species migrate easily and as naturally as possible along and within the river system, (5A) the ecosystem connections between freshwater, wetlands, and the coastal environment are preserved and, wherever possible, restored		

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			(5B) environmental flows and levels in water bodies sustain, and wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, (5C) food production in the area is supported by innovative and sustainable land and water management practices that reduce discharges of nutrients and other contaminants to water bodies where required to ensure that they are safe for human contact, (5D) there are no direct discharges of wastewater containing sewage to water bodies, (6) the national significance of the Clutha hydro-electricity generation scheme is recognised, (7) in addition to (1) to (6) above: (d) in the Upper Lakes rohe, the high quality waters of the lakes and their tributaries are protected, and if degraded are improved, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community, (e) in the Dunstan, Manuherekia and Roxburgh rohe: ~~(iv) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and~~ ~~(v) innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and~~ ~~(vi) sustainable abstraction occurs from main stems or groundwater in preference to tributaries,~~ (f) in the Upper Lakes and Lower Clutha rohe: (v) ~~there is no further~~ minimise modification of the shape and behaviour of the water bodies and promote opportunities to restore the natural form and function of water bodies ~~are promoted~~ wherever possible, and ~~(vi) the ecosystem connections between freshwater, wetlands and the coastal~~		~~(iv) there are no direct discharges of wastewater to water bodies, and~~ (8) the outcomes sought in (7) are to be achieved within the following timeframes: (a) by 2030 in the Upper Lakes rohe, (b) by 2045 in the Dunstan, Manuherekia, Roxburgh and Lower Clutha rohe, ~~and~~ (c) ~~by 2050 in the Manuherekia rohe.~~

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Background document version[2]</th><th>Contact's comments</th><th>Changes requested[3]</th></tr>
<tr><td></td><td></td><td></td><td>~~environment are preserved and, wherever possible, restored,~~
~~(vii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and~~
~~(viii) there are no direct discharges of wastewater to water bodies, and~~
(8) the outcomes sought in (7) are to be achieved within the following timeframes:
(d) by 2030 in the Upper Lakes rohe,
(e) by 2045 in the Dunstan, Manuherekia, Roxburgh and Lower Clutha rohe, ~~and~~
~~(f) by 2050 in the Manuherekia rohe.~~</td><td></td><td></td></tr>
<tr><td>17.</td><td>LF-VM-P5</td><td>128</td><td>LF–VM–P5 – Freshwater Management Units (FMUs) and rohe
Otago's fresh water resources are managed through the following freshwater management units or rohe which are shown on MAP1:
Table 3 – Freshwater Management Units and rohe<table><tr><td>Freshwater Management Unit</td><td>Rohe</td></tr><tr><td>Clutha Mata-au</td><td>Upper Lakes
Dunstan
Manuherekia
Roxburgh
Lower Clutha</td></tr><tr><td>Taieri</td><td>n/a</td></tr><tr><td>North Otago</td><td>n/a</td></tr><tr><td>Dunedin & Coast</td><td>n/a</td></tr><tr><td>Catlins</td><td>n/a</td></tr></table>LF–VM–P5 – Freshwater Management Units (FMUs) and rohe
Otago's fresh water resources are managed through the following freshwater management units or rohe which are shown on MAP1:
Table 3 – Freshwater Management Units and rohe</td><td>Contact supports the proposed freshwater management units and rohe as set out in this policy and MAP1</td><td>No changes requested.</td></tr>
</table>

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<tr><th></th><th>Provision</th><th>Page number</th><th>Notified version[1]
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Manuherekia
Roxburgh
Lower Clutha</td></tr>
<tr><td>~~Taieri~~ Taiari</td><td>n/a</td></tr>
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<tr><td>Catlins</td><td>n/a</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>18.</td><td>LF-VM-P6</td><td>128
146</td><td>LF–VM–P6 – Relationship between FMUs and rohe
Where rohe have been defined within FMUs:
(1) environmental outcomes must be developed for the FMU within which the rohe is located,
(2) if additional environmental outcomes are included for rohe, those environmental outcomes:
(a) set target attribute states that are no less stringent than the parent FMU environmental outcomes if the same attributes are adopted in both the rohe and the FMU, and
(b) may include additional attributes and target attribute states provided that any additional environmental outcomes give effect to the environmental outcomes for the FMU,
(3) limits and action plans to achieve environmental outcomes may be developed for the FMU or the rohe or a combination of both,
(4) any limit or action plan developed to apply within a rohe:
(a) prevails over any limit or action plan developed for the FMU for the same attribute, unless explicitly stated to the contrary, and
(b) must be no less stringent than any limit set for the parent FMU for the same attribute, and</td><td>Contact supports in part this provision as it provides a framework for the development of environmental outcomes; and target attribute states for the various rohe within FMUs. However, Contact seeks recognition of section 3.31 of the NPSFM which allows specific attribute states to be set in respect of the CHS and other nationally significant hydroelectric generation schemes.</td><td>Contact seeks amendments to the policy to recognise section 3.31 of the NPSFM.</td></tr>
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			(c) must not conflict with any limit set for the underlying FMU for attributes that are not the same, and (5) the term "no less stringent" in this policy applies to attribute states (numeric and narrative) and any other metrics and timeframes (if applicable).		
			LF–VM–P6 – Relationship between FMUs and rohe Where rohe have been defined within FMUs: (1) environmental outcomes must be developed for the FMU within which the rohe is located, (2) ~~if~~ any additional rohe-specific environmental outcomes ~~are included for rohe, those environmental outcomes~~: (a) must set target attribute states that are no less stringent than the parent FMU environmental outcomes if the same attributes are adopted in both the rohe and the FMU, and (b) may include additional attributes and target attribute states provided that any additional environmental outcomes give effect to the environmental outcomes for the FMU, (3) limits and action plans to achieve environmental outcomes including by achieving target attribute states, may be developed for the FMU or the rohe or a combination of both, (4) any limit or action plan developed to apply within a rohe: (a) prevails over any limit or action plan developed for the FMU for the same attribute, unless explicitly stated to the contrary, and (b) must be no less stringent than any limit or action plan set for the parent FMU for the same attribute, and (c) must not conflict with any limit set or action plan developed for the ~~underlying~~ parent FMU for attributes that are not the same, and the term "no less stringent" in this policy applies to attribute states (numeric and narrative) and any other metrics and timeframes (if applicable).		

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19.	**LF-VM-E2**	129 148	**LF–VM–E2 – Explanation** Implementing the NPSFM requires Council to identify Freshwater Management Units (FMUs) that include all freshwater bodies within the region. Policy LF–VM–P5 identifies Otago's five FMUs: Clutha Mata-au FMU, Taieri FMU, North Otago FMU, Dunedin & Coast FMU and Catlins FMU. The Clutha Mata-au FMU is divided into five sub-FMUs known as 'rohe'. Policy LF–VM–P6 sets out the relationship between FMUs and rohe which, broadly, requires rohe provisions to be no less stringent than the parent FMU provisions. This is to avoid any potential for rohe to set lower standards than others which would affect the ability of the FMU to achieve its stated outcomes. Same as above.	Contact **supports in part** this as an appropriate explanation of Policies LF-VM-P5 and P6, however, seeks amendment to reflect the specific provision of clause 3.31 of the NPSFM as noted above in respect of the relevant policies.	Contact seeks amendments to the explanation to reflect clause 3.31 of the NPSFM.
	LF – FW				
20.	**LF-FW-O8**	130 157	**LF–FW–O8 – Fresh water** In Otago's water bodies and their catchments: (1) the health of the wai supports the health of the people and thriving mahika kai, (2) water flow is continuous throughout the whole system, (3) the interconnection of fresh water (including groundwater) and coastal waters is recognised, (4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and (5) the significant and outstanding values of Otago's outstanding water bodies are identified and protected. **LF–FW–O8 – Fresh water** In Otago's water bodies and their catchments: (7) the health of the wai supports the health of the people, their connections with water bodies, and thriving ~~mahika kai~~ *mahika kai,* (8) ~~water flow is continuous throughout the whole system~~, within catchments (ki uta ki tai), artificial interruption of water flow is minimised to the smallest degree reasonably practicable, (9) the interconnection of fresh water (including groundwater) and coastal waters is recognised,	Contact **opposes in part** this objective. Similar to the points made above in respect of LF-VM-O2, Contact supports nearly all of the environmental goals outlined in the vision, and in particular, water quality and thriving mahika kai. However, it is concerned that this provision seeks to achieve outcomes which cannot be practicably achieved within the Clutha Mata-au FMU. For example, clause 4 of this objective seeks that native fish can migrate "as easily and as naturally as possible". "As possible" is a very high threshold and arguably achieving natural migration is possible in all circumstances by avoiding, or at its extreme removing an existing fish migration impediment such as a dam structure. Contact works hard to facilitate the effective passage of tuna and kanakana both up and down the Clutha Mata-Au, but its trap and transfer activities for these species could not be considered 'natural'. This requirement also goes further than the NPSFM which does not require natural migration of indigenous fish species and instead seeks to ensure the passage of fish is maintained, or is improved, by instream structures. Contact is also concerned about the proposed amendment to LF-FW-O8(2) in the background document version for similar reasons. In respect of subclause (5), Contact reserves its position on this provision subject to the outcome of the Schedule 1 process which will determine the	Contact requests that this objective to address the concerns noted. By way of example only, Contact proposes the following amendments to the objective (using the background document version as base text): **LF–FW–O8 – Fresh water** In Otago's water bodies and their catchments: (1) the health of the wai supports the health of the people, their connections with water bodies, and thriving ~~mahika kai~~ *mahika kai,* (2) ~~water flow is continuous throughout the whole system~~, within catchments (ki uta ki tai), artificial interruption of water flow is minimised to the ~~smallest degree~~ extent reasonably practicable, (3) the interconnection of fresh water (including groundwater) and coastal waters is recognised, (4) ~~native~~ fish can migrate easily and as naturally as ~~possible~~ practicable and taoka species and their habitats are protected and sustained to the extent reasonably practicable, ~~and~~ (5) the significant and outstanding values of Otago's outstanding water bodies are identified and protected, and (6) the contribution of fresh water to hydroelectric generation, and the nationally significant Clutha Hydro Scheme is

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			(10) ~~native~~ fish can migrate easily and as naturally as possible and taoka species and their habitats are protected and sustained, and (11) the significant and outstanding values of Otago's outstanding water bodies are identified and protected.	policies for identification of outstanding water bodies and their values. As a general point, Contact also seeks specific recognition of the essential contribution fresh water makes to hydroelectric generation in general, and the CHS in particular. As noted above, the CHS contributes approximately 12% of New Zealand's renewable electricity generation, is a lifeline utility, and is specifically recognised as nationally significant infrastructure under the NPSFM. Further, in order to give effect to the NPSREG, the essential contribution of fresh water to hydroelectric generation should be recognised.	recognised, provided for and protected, including consideration of generation capacity, storage and operational flexibility
21.	**LF-FW-O9**	130 167	**LF–FW–O9 – Natural wetlands** 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, (2) there is no decrease in the range and diversity of indigenous ecosystem types and habitats in natural wetlands, (3) there is no reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if degraded they are improved, and (4) their flood attenuation capacity is maintained.	Contact **opposes in part** the objective, which fails to reflect the recognised policy exception for specified infrastructure in clause 3.22 of the NPSFM.	Contact seeks an amendment to the objective that appropriately reflects the exception for specified infrastructure in clause 3.22 of the NPSFM. By way of example, the objective could be amended to include a specific subclause (5) which reflects the process for specified infrastructure set out in the NPSFM,
			LF–FW–O9 – Natural wetlands Otago's natural wetlands are protected or restored so that: (1) ~~mahika kai~~ *mahika kai* and other mana whenua values are sustained and enhanced now and for future generations, (2) there is ~~no~~ minimal decrease in the ~~range~~ extent and diversity of indigenous ecosystem types and habitats in natural wetlands, (3) there is ~~no~~ minimal reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if these have been degraded they are improved, and (4) their flood attenuation and water storage capacity is maintained.		

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22.	**LF-FW-P7**	130 177	**LF–FW–P7 – Fresh water** 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, (2) the habitats of indigenous species associated with water bodies are protected, including by providing for fish passage, (3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 90% of rivers and 98% of lakes, and (b) by 2040, 95% of rivers and 100% of lakes, and (4) mahika kai and drinking water are safe for human consumption, (5) existing over-allocation is phased out and future over-allocation is avoided, and (6) fresh water is allocated within environmental limits and used efficiently. **LF–FW–P7 – Fresh water** Environmental outcomes, attribute states (including target attribute states), environmental flows and levels, and limits ensure that: (1) the health and well-being of water bodies is maintained or, if degraded, improved, (2) the habitats of indigenous freshwater species ~~associated with water bodies~~ are protected and sustained, including by providing for fish passage, (2A) the habitats of trout and salmon are protected, including by providing for fish passage, insofar as protection is consistent with (2), (3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 90% of rivers and 98% of lakes, and (b) by 2040, 95% of rivers and 100% of lakes, and (4) ~~mahika kai~~ *mahika kai* and drinking water are safe for human consumption, (5) existing over-allocation is phased out and future over-allocation is avoided, ~~and~~	Contact **supports in part** this policy, with the amendments proposed in the background document version, however, seeks further amendment to recognise the critical importance of hydroelectric generation schemes to maintaining and increasing New Zealand's renewable electricity generation and meeting its emissions reduction goals, and the particular importance of the CHS in achieving that as nationally significant infrastructure specifically recognised by the NPSFM. Similar to the points made above, Contact also seeks that the policy is amended to reflect that the ability to which habitats can be protected, or fish passage provided for, may be limited in respect of the CHS.	Contact seeks amendment to LF-FW-P7 to appropriately recognise, provide for and protect the contribution of freshwater to renewable electricity generation and therefore climate change mitigation; and to recognise that there are practical limitations in respect of the CHS. By way of example only, Contact proposes the following amendments: **LF–FW–P7 – Fresh water** Environmental outcomes, attribute states (including target attribute states), environmental flows and levels, and limits ensure that: (1) the health and well-being of water bodies is maintained or, if degraded, improved, (2) the habitats of indigenous freshwater species ~~associated with water bodies~~ are protected and sustained, including by providing for fish passage to the extent reasonably practicable, (2A) the habitats of trout and salmon are protected to the extent reasonably practicable, including by providing for fish passage, insofar as protection is consistent with (2), (3) specified rivers and lakes are suitable for primary contact within the following timeframes: (4) by 2030, 90% of rivers and 98% of lakes, and (5) by 2040, 95% of rivers and 100% of lakes, and (6) ~~mahika kai~~ *mahika kai* and drinking water are safe for human consumption, (7) existing over-allocation is phased out and future over-allocation is avoided, ~~and~~ (8) allocation of fresh water is ~~allocated~~ within ~~environmental~~ limits on resource use and used efficiently~~.~~ and (9) the role of freshwater management as part of New Zealand's integrated response to climate change is recognised, provided for and protected, including by protecting the generation capacity, storage and operational flexibility of the nationally significant Clutha Hydro Scheme.

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			(6) allocation of fresh water is ~~allocated~~ within ~~environmental~~ limits on resource use and used efficiently.~~-~~ and (7) the role of freshwater management as part of New Zealand's integrated response to climate change is recognised.		
23.	**LF-FW-P9**	131 188	**LF–FW–P9 – Protecting natural wetlands** Protect natural wetlands by: (1) avoiding a reduction in their values or extent unless: (a) the loss of values or extent arises from: (i) the customary harvest of food or resources undertaken in accordance with tikaka Māori, (ii) restoration activities, (iii) scientific research, (iv) the sustainable harvest of sphagnum moss, (v) the construction or maintenance of wetland utility structures, (vi) the maintenance of operation of specific infrastructure, or other infrastructure, (vii) natural hazard works, or (b) the Regional Council is satisfied that: (i) the activity is necessary for the construction or upgrade of specified infrastructure, (ii) the specified infrastructure will provide significant national or regional benefits, (iii) there is a functional need for the specified infrastructure in that location, (iv) the effects of the activity on indigenous biodiversity are managed by applying either ECO–P3 or ECO–P6 (whichever is applicable), and (v) the other effects of the activity (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and (2) not granting resource consents for activities under (1)(b) unless the Regional Council is satisfied that: (a) the application demonstrates how each step of the effects management hierarchies in (1)(b)(iv) and (1)(b)(v) will be	Contact **opposes** this policy. Contact considers this policy does not accurately reflect the requirements of the NPSFM and fails to provide a consenting pathway for specified infrastructure as anticipated by the NPSFM and in order to give effect to the NPSREG. Contact's position on this policy is also dependent on the outcome of other provisions cross-referred to within the policy that are to be considered as part of the Schedule 1 process (including EC0-P3 and ECO-P6). In addition, Contact considers that subclause (2) is inappropriate as it appears to be more restrictive than the effects management hierarchy set out in the NPSFM.	Contact seeks changes to ensure that the policy accurately reflects the requirements of the NPSFM, the NPSREG and the need to protect existing and provide for new renewable electricity generation as a core part of climate change mitigation. Given the linkages with the other policies to be considered in the Schedule 1 process, we have not sought specific changes at this stage.

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			applied to the loss of values or extent of the natural wetland, and (b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b)(iv) and (1)(b)(v).		
			LF–FW–P9 – Protecting natural wetlands Protect natural wetlands by: (1) avoiding a reduction in their values or extent unless: (a) the loss of values or extent arises from: (i) the customary harvest of food or resources undertaken in accordance with tikaka Māori, (ii) restoration activities, (iii) scientific research, (iv) the sustainable harvest of sphagnum moss, (v) the construction or maintenance of wetland utility structures, (vi) the maintenance ~~of~~ or operation of ~~specific~~ specified infrastructure, or other infrastructure, (vii) natural hazard works, or (b) the Regional Council is satisfied that: (i) the activity is necessary for the construction or upgrade of specified infrastructure, (ii) the specified infrastructure will provide significant national or regional benefits, (iii) there is a functional need for the specified infrastructure in that location, (iv) the effects of the activity on indigenous biodiversity are managed by applying either ECO–P3 or the effects management hierarchy (in relation to indigenous biodiversity in ECO–P6 (whichever is applicable), and (v) the other effects of the activity (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy (in relation to natural wetlands and rivers) in LF-FW-P13A, and (2) not granting resource consents for activities under (1)(b) unless the Regional Council is satisfied that:		

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			(a) the application demonstrates how each step of the effects management ~~hierarchies~~ hierarchy (in relation to indigenous biodiversity) in (1)(b)(iv) and the effects management hierarchy (in relation to natural wetlands and rivers) in (1)(b)(v) will be applied to the loss of values or extent of the natural wetland, and (b) any consent is granted subject to conditions that apply the effects management ~~hierarchies~~ in (1)(b)(iv) and ~~hierarchies~~ hierarchy (in relation to indigenous biodiversity) in (1)(b)(iv) and the effects management hierarchy (in relation to natural wetlands and rivers) in (1)(b)(v) in respect of any loss of values or extent of the natural wetland.		
24.	**LF-FW-P10**	132 193	**LF–FW–P10 – Restoring natural wetlands** 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 pest species and vegetation clearance, and (4) the exclusion of stock. Same as above.	Contact **opposes in part** this policy, which fails to appropriately recognise the exception for specified infrastructure as set out in clause 3.22 of the NPSFM and fails to give effect to the NPSREG.	Contact seeks amendments to the policy that appropriately recognise the specific exception for specified infrastructure as provided in clause 3.22 of the NSPFM and to give effect to the NPSREG.
25.	**LF-FW-P15**	133 203 208	**LF–FW–P15 – Stormwater and wastewater discharges** Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by: (1) except as required by LF–VM–O2 and LF–VM–O4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and (2) requiring: (a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, (b) all stormwater to be discharged into a reticulated system, where one is available,	Contact **supports in part** LF-FW-P15 as set out in the background document version. While the provision appears appropriate for urban stormwater, it may not be appropriate for all situations, including, for example, construction stormwater in rural environments. Contact is **neutral** on LF-FW-P15A as set out in the background document version.	Contact seeks amendments to LF-FW-P15 to make clear that the policy applies to urban stormwater only.

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			(c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring for reticulated stormwater and wastewater systems, (d) on-site wastewater systems to be designed and operated in accordance with best practice standards, (e) stormwater and wastewater discharges to meet any applicable water quality standards set for FMUs and/or rohe, and (f) the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and (3) promoting the reticulation of stormwater and wastewater in urban areas.		
			LF–FW–P15 – Stormwater and ~~wastewater~~ industrial and trade waste discharges Minimise the adverse effects of direct and indirect discharges of stormwater and industrial and trade waste~~wastewater~~ to fresh water by: (1) except as required by LF–VM–O2 and LF–VM–O4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and (2) requiring: (a) ~~all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available~~, (b) all stormwater and industrial and trade waste to be discharged into a reticulated system, where one is made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved environmental outcomes, (c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring ~~for~~ into reticulated stormwater ~~and wastewater~~ systems,		

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			~~(d) on-site wastewater systems to be designed and operated in accordance with best practice standards,~~ (e) ~~stormwater and wastewater~~ that discharges ~~to~~ meet any applicable water quality standards set for FMUs and/or rohe, and (f) the use of water sensitive ~~urban~~ design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and (3) promoting the reticulation of stormwater ~~and wastewater~~ in urban areas~~.~~ and (4) promoting source control as a method for reducing contaminants in discharges of stormwater and industrial and trade waste.		
			LF-FW-P15 – Stormwater ~~and~~ ~~wastewater~~ ~~industrial and trade waste~~ discharges Minimise the adverse effects of direct and indirect discharges of stormwater ~~and industrial and trade waste~~ ~~wastewater~~ to fresh water by: ~~(1) except as required by LF-VM-O2 and LF-VM-O4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and~~ (2) requiring: ~~(a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available~~, (b) all stormwater ~~and industrial and trade waste~~ to be discharged into a reticulated system, where one is made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved environmental outcomes, (c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring ~~for~~ into reticulated stormwater ~~and wastewater~~ systems, ~~(d) on-site wastewater systems to be designed and operated in accordance with best practice standards,~~		

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			(e) ~~stormwater and wastewater~~ that any discharges do not prevent water bodies from ~~to~~ meeting any applicable water quality standards set for FMUs and/or rohe, and (f) the use of water sensitive ~~urban~~ design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, ~~and~~ (3) promoting the reticulation of stormwater ~~and wastewater~~ in urban areas, and (4) promoting source control as a method for reducing contaminants in discharges of stormwater ~~and industrial and trade waste~~. **LF-FW-P15A – Discharges containing animal effluent, sewage and other human wastes, and industrial and trade waste** ...		
26.	**LF-FW-M6**	134 225 228	**LF–FW–M6 – Regional plans** 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: (1) identify the compulsory and, if relevant, other values for each Freshwater Management Unit, (2) state environmental outcomes as objectives in accordance with clause 3.9 of the NPSFM, (3) identify water bodies that are over-allocated in terms of either their water quality or quantity, (4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai and provide for: (a) the behaviours of the water body including a base flow or level that provides for variability, (b) healthy and resilient mahika kai, (c) the needs of indigenous fauna, including taoka species, and aquatic species associated with the water body, (d) the hydrological connection with other water bodies, estuaries and coastal margins,	Contact **supports in part** this method. Contact seeks amendments to the method to reflect the other amendments sought to the LF-FW Chapter. Contact also seeks that the method make specific reference to the specific provisions for the Clutha Hydro Scheme and other nationally significant schemes in clause 3.31 of the NPSFM so that this can be addressed at the regional plan stage. This is necessary to give effect to the NPSFM, but also the NPSREG.	Contact requests that this method is amended to reflect the other amendments requested to the LF-FW Chapter set out above, and include specific reference to clause 3.31 of the NPSFM.

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			(e) the traditional and contemporary relationship of Kāi Tahu to the water body, and (f) community drinking water supplies, and (5) include limits on resource use that: (a) differentiate between types of uses, including drinking water, and social, cultural and economic uses, in order to provide long-term certainty in relation to those uses of available water, (b) for water bodies that have been identified as over-allocated, provide methods and timeframes for phasing out that over-allocation, (c) control the effects of existing and potential future development on the ability of the water body to meet, or continue to meet, environmental outcomes, (d) manage the adverse effects on water bodies that can arise from the use and development of land, and (6) provide for the off-stream storage of surface water where storage will: (a) support Te Mana o te Wai, (b) give effect to the objectives and policies of the LF chapter of this RPS, and (c) not prevent a surface water body from achieving identified environmental outcomes and remaining within any limits on resource use, and (7) identify and manage natural wetlands in accordance with LF–FW–P7, LF–FW–P8 and LF–FW–P9 while recognising that some activities in and around natural wetlands are managed under the NESF, and (8) manage the adverse effects of stormwater and wastewater in accordance with LF–FW–P15.		
			LF–FW–M6 – Regional plans 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: (1) identify the compulsory and, if relevant, other values for each Freshwater Management Unit,		

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			(2) state environmental outcomes for each identified value as objectives in accordance with clause 3.9 of the NPSFM, (2A) identify attributes for each value and set baseline states for those attributes, (2b) set target attribute states and other criteria to support the achievement of environmental outcomes, (2C) identify any interim milestones (including any relevant interim target attribute states) for achieving the long-term visions for freshwater set out in LF-VM-O2 to LF-VM-O6, ~~(3) identify water bodies that are over-allocated in terms of either their water quality or quantity,~~ (4) include environmental flow and level regimes for water bodies (including groundwater) that support the achievement of environmental outcomes and the freshwater visions in LF-VM give effect to Te Mana o te Wai and provide for: (a) the behaviours of the water body including a base flow or level that provides for variability, (b) healthy and resilient ~~mahika kai~~ *mahika kai*, (c) the needs of indigenous fauna, including taoka species, and aquatic species associated with the water body, (d) the hydrological connection with other water bodies, estuaries and coastal margins, (e) the traditional and contemporary relationship of Kāi Tahu to the water body, and (f) community drinking water supplies, and (5) include limits on resource use that support the achievement of environmental outcomes and the freshwater visions in LF-VM, give effect to Te Mana o te Wai and: (a) differentiate between types of uses, including drinking water, and social, cultural and economic uses, in order to provide long-term certainty ~~in relation to~~ about the availability of water for those uses ~~of available water~~, ~~(b) for water bodies that have been identified as over-allocated, provide methods and~~		

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			~~timeframes for phasing out that over-allocation,~~ (c) control the effects of existing and potential future development on the ability of the water body to meet, or continue to meet, environmental outcomes, (d) manage the adverse effects on water bodies that can arise from the use and development of land, and (5A) identify water bodies that are over-allocated and the methods and timeframes for phasing out that over-allocation (including through environmental flow and level regimes and limits on resource use) within the timeframes required to achieve the relevant freshwater vision set out in LFVM (6) provide for the off-stream storage of surface water where storage will: (a) support Te Mana o te Wai, (b) give effect to the objectives and policies of the LF chapter of this RPS, and (c) not prevent a surface water body from achieving identified environmental outcomes and remaining within any limits on resource use, and (7) identify and manage natural wetlands in accordance with ~~LF–FW–P7~~, LF–FW–P8 ~~and~~ LF–FW–P9 and LF-FW-P10 while recognising that some activities in and around natural wetlands are managed under the NESF, ~~and~~ (7a) recognise and respond to Kāi Tahu cultural and spiritual concerns about mixing of water between different catchments. (8) manage the adverse effects of discharges of stormwater and industrial and trade waste ~~and wastewater~~ in accordance with LF–FW–P15 and discharges containing sewage and other human wastes in accordance with LF-FW-P15A, and (9) promote source control as a method for reducing contaminants in discharges of stormwater or industrial and trade waste and discharges containing sewage or other human wastes.		

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27.	**LF-FW-M7**	135 235	**LF–FW–M7 – District plans** Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to: (1) map outstanding water bodies and identify their outstanding and significant values using the information gathered by Otago Regional Council in LF–FW–M5, and (2) include provisions to avoid the adverse effects of activities on the significant and outstanding values of outstanding water bodies, (3) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the subdivision, use or development of land, and (4) reduce the adverse effects of stormwater discharges by managing the subdivision, use and development of land to: (a) minimise the peak volume of stormwater needing off-site disposal and the load of contaminants carried by it, (b) minimise adverse effects on fresh water and coastal water as the ultimate receiving environments, and the capacity of the stormwater network, (c) encourage on-site storage of rainfall to detain peak stormwater flows, and (d) promote the use of permeable surfaces.	Contact **supports in part** the method, subject to the points made below. Contact seeks amendments to clause (2) – the requirement to avoid adverse effects on the significant and outstanding values of outstanding water bodies is effectively a bar on any development. However, the NPSFM does not require that. While Policy 8 of the NPSFM requires protection, that can be achieved by "avoiding or minimising" effects on the values of outstanding water bodies. Similar to above, Contact reserves its position on this provision pending the outcome of the Schedule 1 process on provisions relevant to outstanding water bodies. In respect of clause (2A), Contact seeks amendments to reflect that there are practical limits to the ability to which natural character can be "preserved" in respect of the Clutha Hydro Scheme.	Contact seeks amendments to clauses (2) and (2A). By way of example only, Contact seeks that clause (2) is amended to require that adverse effects on values are "avoided or minimised", and in the context of any outstanding water bodies within the Clutha Hydro Scheme, only to the extent reasonably practicable given the NPSFM direction to provide for the generation capacity, storage and operational flexibility of the scheme. In respect of clause (2A), Contact seeks amendments to make clear that natural character in respect of the lakes and rivers associated with the Clutha Hydro Scheme can only be preserved to the extent reasonably practicable.
			LF–FW–M7 – District plans Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to: (1) map outstanding water bodies and identify their outstanding and significant values using the information gathered ~~by Otago Regional Council in~~ through implementation of LF–FW–M5, and (2) include provisions to avoid the adverse effects of activities on the significant and outstanding values of outstanding water bodies, (2A) include provisions to preserve the natural character of lakes and rivers and their margins from the adverse effects of activities on the surface of water and land use and development on their margins,		

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			(3) require, wherever practicable, the adoption of water sensitive ~~urban~~ design techniques when managing the subdivision, use or development of land, and (4) reduce the adverse effects of stormwater discharges by managing the subdivision, use and development of land to: (a) minimise the peak volume of stormwater needing off-site disposal and the load of contaminants carried by it, (b) minimise adverse effects on fresh water and coastal water as the ultimate receiving environments, and the capacity of the stormwater network, (c) encourage on-site storage of rainfall to detain peak stormwater flows <u>where appropriate</u>, and (d) promote the use of permeable surfaces.		
28.	**LF-FW-M8**	135 237	**LF–FW–M8 – Action plans** 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.	Contact **supports in part** this method as an appropriate method to implement clause 3.15 of the NPSFM. However, Contact seeks amendments to reflect clause 3.31 of the NPSFM.	Contact seeks amendments to the method to record that consideration of clause 3.31 of the NPSFM should be part of developing the action plan.
29.	**LF-FW-E3**	136 239	**LF–FW–E3 – Explanation (paragraphs 2 and 5)** ... The outcomes sought for natural wetlands are implemented by requiring identification, protection and restoration. The first two policies reflect the requirements of the NPSFM for identification and protection but apply that direction to all natural wetlands, rather than only inland natural wetlands (those outside the coastal marine area) as the NPSFM directs. This reflects the views of takata whenua and the community that fresh and coastal water, including wetlands, should be managed holistically and in a consistent way. While the NPSFM requires promotion of the restoration of natural inland wetlands, the policies in this section take a stronger stance, requiring improvement where natural wetlands have been degraded or lost. This is because	Contact **supports in part** this amendment but seeks amendments to reflect the specific treatment of specified infrastructure as referred to elsewhere in this submission.	Contact seeks amendments to reflect the specific treatment of specified infrastructure within the NPSFM.

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			of the importance of restoration to Kāi Tahu and in recognition of the historic loss of wetlands in Otago. ... 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.		
			LF–FW–E3 – Explanation ... The outcomes sought for natural wetlands are implemented by requiring identification, protection and restoration. The first two policies reflect the requirements of the NPSFM for identification and protection but apply that direction to all natural wetlands, rather than only inland natural wetlands (those outside the coastal marine area) as the NPSFM directs. This reflects the views of ~~takata whenua~~ *mana whenua* and the community that fresh and coastal water, including wetlands, should be managed holistically and in a consistent way. While the NPSFM requires promotion of the restoration of natural inland wetlands, the policies in this section take a stronger stance, requiring improvement where natural wetlands have been degraded or lost. This is because of the importance of restoration to Kāi Tahu, to recognise ~~and in recognition of~~ the historic loss of wetlands in Otago, and the indigenous biodiversity values and hydrological values of wetland systems. ... 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.		
30.	**LF-FW-PR3**	137 243	**LF–FW–PR3 – Principal reasons** Otago's water bodies are significant features of the region and play an important role in Kāi Tahu beliefs and traditions. A growing population combined with increased land use intensification has heightened	Contact **supports in part** these principal reasons, but seeks amendments to reflect the need to protect the generation capacity, storage and operational flexibility of the Clutha Hydro Scheme as nationally significant infrastructure recognised under the NPSFM; and the need to provide for the operation,	Contact seeks amendments to the reasons to reflect the importance of the Clutha Hydro Scheme, and renewable electricity generation as explained. For example, the principal reasons could be amended to include the following statement:

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			demand for water, and increasing nutrient and sediment contamination impacts water quality. The legacy of Otago's historical mining privileges, coupled with contemporary land uses, contribute to ongoing water quality and quantity issues in some water bodies, with significant cultural effects. This section of the LF chapter contains more specific direction on managing fresh water to give effect to Te Mana o te Wai and contributes to achieving the long-term freshwater visions for each FMU and rohe. It also reflects key direction in the NPSFM for managing the health and well-being of fresh water, including wetlands and rivers in particular, and matters of national importance under section 6 of the RMA 1991. The provisions in this section will underpin the development of the Council's regional plans and provide a foundation for implementing the requirements of the NPSFM, including the development of environmental outcomes, attribute states, target attribute states and limits. (Some amendments are shown in the background document version)	maintenance and development of renewable electricity generation generally in accordance with the NPSREG.	Otago's water bodies make a significant and important contribution to New Zealand's renewable electricity generation, including through the nationally significant Clutha Hydro Scheme. In order to protect this contribution, it is essential that the provisions recognise, provide for and protect this essential infrastructure, which forms a core part of climate change mitigation.
	LF – LS				
31.	**LF-LS-P18**	138 249	**LF–LS–P18 – Soil erosion** Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by: (1) implementing effective management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to water bodies, including by controlling the timing, duration, scale and location of soil exposure, (2) maintaining vegetative cover on erosion-prone land, and (3) promoting activities that enhance soil retention. **LF–LS–P18 – Soil erosion** Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by: (1) implementing <u>appropriate and</u> effective management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to water bodies, including by	Contact **supports** the policy as appropriate guidance for land use. However, seeks to include "where practicable" within clauses (1) and (2) to recognise that in some instances (for example, the development of a wind farm) the ability to retain topsoil in situ or to maintain vegetative cover may be limited by practical considerations.	Contact seeks amendments to the policy to reflect that there may sometimes be practical limitations in respect of clauses (1) and (2).

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			controlling the timing, duration, scale and location of soil exposure, (2) maintaining vegetative cover on erosion-prone land, to the extent practicable, and (3) promoting activities that enhance soil retention.		
32.	**LF-LS-P21**	139 255	**LF–LS–P21 – Land use and fresh water** 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.	Contact **supports in part** the policy as amended in the background document version. Consistent with the comments made elsewhere in this submission, Contact seeks recognition that the extent to which the riparian margins of the waterbodies associated with the Clutha Hydro Scheme can be maintained or enhanced may be limited by practical considerations necessary to protect the generation capacity, storage and operational flexibility of the Scheme, consistent with NPSFM direction and the NPSREG.	Contact seeks amendments to LF-LS-P21(3) to recognise that there are practical limitations to the extent to which the margins of the waterbodies associated with the Clutha Hydro Scheme can be maintained or enhanced.
			LF–LS–P21 – Land use and fresh water ~~Achieve the improvement or maintenance of fresh water quantity or quality~~ The health and well-being of water bodies is maintained or, if degraded, improved to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) reducing or otherwise managing the adverse effects of direct and indirect discharges of contaminants to water from the use and development of land to meet environmental outcomes, ~~and~~ (2) managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater and. (3) maintaining or, where degraded, enhancing the habitat and biodiversity values of riparian margins in order to reduce sedimentation of water bodies and support improved functioning of catchment processes.		
	Maps				
33.	**MAP 1**	220	MAP1 - Freshwater Management Units	Contact **supports** the maps and the proposed FMUs and rohe as shown within it.	No changes requested.