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Submission on the proposed Otago Regional Policy Statement 2021

This submission is provided on behalf of the Otago Fish and Game Council and the Central South Island Fish and Game Council. For additional information please contact Nigel Paragreen and Jay Graybill using the details below.

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Statutory managers of freshwater sports fish, game birds and their habitat

Otago Fish and Game Council & Central South Island Fish and Game Council

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Abbreviations used

National Planning Framework 2019	19
National Environmental Standard for Freshwater 2020	NES-FW
Proposed Otago Regional Policy Statement 2021	PORPS 2021
Otago Regional Council	ORC
Otago Fish and Game Council and the Central South Island Fish and Game Council	Fish and Game
Resource Management Act 1991	RMA
National Policy Statement	NPS
Te Mana o te Wai	TMOTW
Fish index of biotic integrity	F-IBI
Freshwater Management Unit	FMU
Freshwater Planning Instrument	FPI

The Fish and Game Councils

1. The Otago Fish and Game Council and the Central South Island Fish and Game Councils (collectively referred to in this submission as **Fish and Game**) are the statutory manager of sports Fish and Game bird resources within the Otago and Central South Island Fish and Game regions respectively. They hold functions and responsibilities set out in the Conservation Act 1987. The organisations' functions include, but are not limited to, managing, maintaining and enhancing sports Fish and Game resources in the recreational interests of anglers and hunters; representing the interests and aspirations of anglers and hunters in the statutory planning process; and advocating the interests of the Councils, including their interests in habitats. This submission has been developed in line with these functions.
2. Due to the popularity of angling in New Zealand, the demographic Fish and Game represents when carrying out its statutory functions is significant; however, this is not always obvious. The 2013/2014 Active NZ Survey conducted by Sport and Recreation New Zealand reported that 19.5% of respondents had been fishing (including both marine and freshwater angling) in the past 12 months¹. The survey found fishing had a higher rate of participation than rugby, tramping, football, cricket and basketball for men; and that fishing had a higher participation rate than netball, tennis, snow sports and tramping for women. Within Otago, license sales have exceeded 10,000 licences in the past two decades and in the last decade has increased to over 20,000 licences across all categories. Participation rates estimated from the National Angling Survey² between 1994 and 2015 show that total freshwater fishing effort in the Otago Fish and Game Region ranged from 180,860 to 215,430 angler-days over the fishing season.

Key issues and reasons for submission

A paradigm shift using lessons from the NPS-FM 2020

3. The PORPS 2021 is required to give effect to a range of NPSs and have regard to or consider other guidance. The NPS for Freshwater Management 2020 stands out as it contains a paradigm shift which may be usefully applied to the entire PORPS 2021. It does this through the concept of TMOTW, which challenges all New Zealanders to think differently about water bodies, not as a resource to be used but as an entity to be respected, protected, and restored where degraded. It is a water-centric concept, adding value and guiding human use such that the health and well-being of water is at the heart of all related activities.
4. Fish and Game submits that it will be beneficial for this concept to be adapted to the natural environment as a whole so that it is respected, protected and restored where degraded. Fully adopting and embodying this paradigm shift for the natural environment is the most effective way to achieve the purpose of the RMA, and to transition the Otago Region towards meaningful sustainable management.

¹ Sport and Recreation New Zealand, Sport and Active Recreation in the Lives of New Zealand Adults: 2013/14 Active New Zealand Survey Results, (Wellington, Sport New Zealand, 2015).

² Unwin, M. J., Angler Usage of New Zealand Lake and River Fisheries, (Christchurch, National Institute of Water and Atmospheric Research, 2016).

5. The fundamental concept of TMOTW prioritises a hierarchy of obligations. With a directive hierarchy as the single objective, the direction is clear to all who use the policy statement. This improves the consistency of outcomes and reduces conflict regarding implementation within regions.
6. The NPS-FM 2020 puts into effect the consideration of water, water bodies and ecosystems as holistic entities. The first tier of the hierarchy of obligations prioritises:

“... first, the health and well-being of water bodies and freshwater ecosystems”³

7. This imbues both water bodies and freshwater ecosystems with the characteristics of being healthy and well or, conversely, unhealthy and un-well. Section 1.3 of the NPS-FM 2020 states the mauri of the wai should be protected and that all New Zealanders bear a responsibility to care for freshwater.⁴ From a European cultural perspective,⁵ anthropomorphising components of the environment can sometimes seem unnatural; however, it has benefits for natural resource management. Decision making under the RMA is often compartmentalised, such that adverse effects on components of the environment (i.e., ecology, amenity, economic) are typically discussed individually with the assumption that protecting the sum of all parts will protect the whole. However, this protection has clearly not happened, as evidenced by environmental degradation that has occurred while the RMA has been in force.⁶
8. A priority placed on the health and well-being of a water body creates an additional check that helps combat unaddressed cumulative effects. This same guidance can be applied to the natural environment in general and will aid in achieving the purpose of the PORPS 2021, in achieving “... long term environmental sustainability...”⁷
9. The implications of what can be achieved by adopting this approach is perfectly expressed in *Aratiatia Livestock Limited vs Southland Regional Council* [2019] NZEnvC 208:

“This plan redirects the usual RMA focus on the scale and significance of effects of resource use onto the mauri or life force of water and the enquiry becomes how do users of resources protect the water's mauri and health. ... this plan requires all people to work on the causes of degradation.”⁸

³ NPS-FM 2020 section 2.1(1)(a)

⁴ NPS-FM 2020 section 1.3(1) & (4)(f)

⁵ Other cultural perspectives might instead see this approach as simply a more accurate representation of their world view, such as this Māori perspective, where the author outlines her genealogical relationship with water. <https://thespinoff.co.nz/atea/06-11-2018/wai-maori-a-maori-perspective-on-the-freshwater-debate/>

⁶ For example, ORC water quality monitoring in 2012 found that over half of the sites monitored around the region showed “meaningful declining water quality”. <https://www.odt.co.nz/news/dunedin/water-quality-declining-orc-report>

⁷ PORPS, pg 5

⁸ *Aratiatia Livestock Limited vs Southland Regional Council* [2019] NZEnvC 208

10. This approach, or something similar, will be required for the PORPS 2021 in matters relating to water. Fish and Game submits that the PORPS 2021 will be improved if it adopts concepts of TMOTW for the whole environment. Specifically, by:
- a. creating a clear and directive hierarchy, with the natural environment as the priority;
 - b. imbuing the anthropogenic concepts of health, well-being and resilience⁹ upon the natural environment; and
 - c. ensuring all actions support the health, well-being and resilience of the natural environment.
11. Fish and Game notes that the PORPS 2021 authors have gone quite some way to embodying these principles and this is supported by Fish and Game. At times, Fish and Game seeks further improvements over and above the notified wording.

The protection of trout and salmon habitat

12. Sports fish and game birds are highly valued by a large segment of the New Zealand population as well as international tourists, as highlighted above.
13. Sports fish are also valued by some Māori as part of an expression of evolving culture. In the text below, Mr Whaanga describes how he interacts with some introduced species:

Today, we still have that connection to the interior lands and waters of Te Mata au, which is why we return there. However, it is different now as the traditional foods are not there. There would have once been birds to gather, before travelling back down by mōkihi. There are examples of inland tuna weirs, which would have been places for longer stops.

In the modern context, this is comparable to the seasonal migrations of some holidaymakers to their favourite camping spots. Our people still travel inland to connect with their whakapapa and visit their favourite places to fish and hunt. As traditional mahinga kai resources have dwindled or disappeared, like weka, we will still go up there and fish for trout, hunt rabbits, pigs and deer.”¹⁰

14. Fish and Game acknowledge that the introduction of sports fish in the 1800s has had, and is continuing to have, an impact on aquatic species. Whilst angling provides a highly valued recreational opportunity and a source of food, in recent years sports fish have been blamed for the decline of New Zealand aquatic species. In a report appropriately titled *Salmonids and Native Fish in New Zealand: Are trout to blame for the decline in native fish?*, Atkinson and Joy find that:

⁹ Fish and Game recommends adding ‘resilience’ to the list of anthropogenic concepts in the hierarchy of obligations and notes that this is already a key theme within the notified PORPS 2020 wording.

¹⁰ Evidence in Chief of Mr Dean Whaanga on Plan Change 7, paragraphs 14 & 15. <https://environmentcourt.govt.nz/assets/Documents/Publications/05.02.21-FINAL-Otago-PC7-Dean-Whaanga-Culture-34616627-v-4.PDF>

“The declines in freshwater ecosystem health are clearly linked to the intensification and expansion of pastoral agriculture and to a lesser extent industry and urbanisation. In the last 20 years the number of dairy cows in the country, and the amount of water taken for irrigation has almost doubled. Between 1990 and 2005 the use of nitrogen fertiliser in New Zealand increased by more than 800 per cent (the highest percentage increase of 29 OECD countries) and phosphate fertiliser use increased by more than 100 per cent (the second highest increase in the OECD).

Native fish are declining rapidly with now more than sixty percent of New Zealand’s native freshwater fish as well as the only freshwater crayfish and mussel species listed as threatened or in-decline.

Introduced salmonids are widespread throughout New Zealand waterways and have significant impacts on some but not all native fish species. Non-migratory galaxiids are particularly vulnerable due to their small geographical range as well as being very similar to salmonids in terms of feeding behaviour, food and habitat preferences. Other species of native fish, such as bullies and smelt seem more able to co-exist with salmonids despite also being subject to predation.

The recent claims from Federated Farmers that trout are more to blame than intensive farming for the demise of both water quality and native fish population is totally unfounded. Trout can have an impact on native fish but it is not in the same magnitude as the effects of sedimentation, eutrophication, and water abstraction from intensive farming. Trout can potentially increase the amount of periphyton in streams by altering food web dynamics but they cannot add nutrients to a system like intensive farming does. Thus, the magnitude of the effects of trout on stream ecosystems compared to agriculture is not on the same scale.”¹¹

15. Similarly, the background paper¹² outlining the F-IBI attribute¹³ in the NPS-FM 2020 indicates that intensive land use upstream of sampling sites was associated with poor F-IBI scores. The presence of non-indigenous species is considered as a negative, detracting from the F-IBI score. However, it did not have as significant an impact as land use.
16. The protection of trout and salmon habitat is a matter to be had particular regard to in the RMA,¹⁴ and Policies 9 and 10 of the NPS-FM requires the habitat of trout and salmon to be protected, insofar as it is consistent with protection of habitat for indigenous species. The PORPS 2021 fails to give effect to these directions as there is no guidance on how or when to protect the habitat of trout and salmon nor is there clear direction on how species interactions will be managed.
17. Fish and Game infers that the absence of direction to protect the habitat of trout and salmon in the PORPS 2021 means that in *no instance* is the protection of trout and salmon habitat in Otago is consistent with the protection of the habitat of indigenous species. Fish and Game considers that there are cases where the protection of indigenous species and trout and salmon is consistent; this can be demonstrated conceptually, as the

¹¹ Atkinson, N., & Joy, M. (2012). *Salmonids and native fish in New Zealand: Are trout to blame for the decline in native fish?* Wellington: Fish and Game New Zealand.

¹² Joy, M., & Death, R. (2004). *Application of the index of biotic integrity methodology to New Zealand freshwater fish communities*. Environmental Management, 415 - 428.

¹³ A measure of biotic integrity for fish populations, which a low score indicates worse integrity.

¹⁴ RMA section 7(h)

protection of the flows and water quality within a pool that is habitat to both a trout and eel improves the quality and quantity of habitat for both species.

18. The above leads Fish and Game to seek relief for the PORPS 2021 that achieves two key points:
 - a. protects water bodies and freshwater ecosystems, including the habitat of trout and salmon, from the impacts of land use and restores them where they are degraded; and
 - b. develops a framework for considering when protecting the habitat of trout and salmon is consistent with protecting the habitat of indigenous species and assists in managing species interactions where they are of concern.

Recognition of human interaction with waterbodies

19. The health and well-being of people and communities is an important component in how resources are managed. In turn, when the environment is healthy and well, with ample access opportunities, people are able to contribute to their health and well-being needs by connecting with the environment. Conversely, when the environment is unhealthy, these opportunities diminish and the activities once undertaken become a distant memory. Many waterbodies across the region now fail to provide for the opportunities that New Zealanders so greatly value.
20. Engagement with the environment is different for different people. Some connect recreationally, others to harvest food, some spiritually or culturally.
21. Fish and Game licence holders engage in outdoor activities both for recreation and to gather food for themselves, their families or communities. This long-time tradition is highly valued and often passed on from generation to generation. Māori engage with the environment in a similar way for mahinga kai and cultural traditions and have done so for centuries. The fundamental concept of enabling people to use, enjoy and connect meaningfully with waterbodies to further their amenity, health and well-being, including through recreation and harvesting food, should be recognised and provided for within Otago planning framework.
22. The ability for people to interact with waterbodies in a meaningful way is important to recognise in the PORPS 2021, yet is distinctly missing. People should be able to engage in recreational opportunities, harvest food and mahinga kai in a healthy environment. These experiences help define who we are as a people and as a country. People from around the world come to New Zealand to seek out these same experiences. Access to outdoor experiences, recreational opportunities and the gathering of food is more important than ever and ensuring that these opportunities are available to future generations is vital.

A necessity for clear wording – removing ambiguity for the benefit of all

23. There is a necessity for directive wording in the PORPS 2021 if it is to overcome centuries of environmental degradation in Otago at the hands of humans. Change in this context will require all New Zealanders to play a part and it may not always be easy. For this reason, Fish and Game has a preference to embed directive wording in the PORPS 2021, so that all New Zealanders are clear about the path forward and what is required.
24. This is particularly important when considering the need of the PORPS 2021 to give effect to National Policy Statements. The PORPS 2021 must directing how to reconcile competing policy tensions in the higher order documents. It needs to be directive enough so that, when complete, there will not be a need to revisit a National Policy Statement or Part 2 of the RMA.

A need for clear language

25. The PORPS 2021 states, “*The [P]ORPS has been drafted using direct language and clarity of outcomes sought*”.¹⁵ However, it falls short of this claim at multiple points. Fish and Game considers this statement as critical to achieving outcomes and seeks relief that will reduce uncertainty as to the conclusions to be drawn from provisions.
26. The PORPS 2021 uses wording which creates uncertainty as to the direction it is providing. Phrases like ‘sustain’, ‘encourage’, ‘promote’, ‘practicable’ or ‘wherever possible’ does not provide clear direction to the decision-maker and undermines the effectiveness of the provision.
27. Similarly, other phrases used in the PORPS 2021, such as ‘improve’, ‘maintain’ or ‘enhance’ provide a general sense of direction but not specific detail on what is intended. The directives ‘improve’ or ‘enhance’ are particularly problematic, as they direct that movement be in a positive direction but do not suggest how much movement is necessary. Identifying the scale of improvement required is then difficult and often politically fraught. The phrase ‘maintain’, in the context of ecological integrity, faces the opposite problem. The phrase is often associated with preserving the status quo and directs the factors within the ecological integrity concept to be preserved at status quo levels.
28. In these cases where ‘maintain’, ‘improve’ or ‘enhance’ is used, Fish and Game has generally opted to seek the wording ‘protect and restore’, with a definition provided for restoration to aid in clarity. ‘Protect’ has a similar meaning to ‘maintain’ in that the quality or extent of the attribute is not to be meaningfully reduced, but has fewer connotations to retaining the status quo. In the context of a degraded ecosystem, such as a heavily abstracted river where a decision maker is considering activities against a naturalised flow, the protection of habitat might require that habitat be improved from the status quo.
29. This is intermixed then with the term ‘restore’, but using such a term in addition is useful to add guidance. Fish and Game has a preference for using ‘restore’ in addition to ‘protect’, as it can be defined to require a target state, so that decision makers face less ambiguity as to how much improvement

¹⁵ PORPS 2021, pg 11

is required in a given circumstance. The definition proposed by Fish and Game is such that restoration need not occur when the target state is already achieved; therefore, the provision direction can be to protect *and* restore.

30. Multiple points within the PORPS 2021 use wording that is akin to limits, such as 'environmental limits', 'bottom lines' or 'environmental constraints'. Fish and Game submits that 'environmental limits' is most suitable as it aligns with commonly used terminology, including that in the NPS-FM 2020. Language should be clear and consistent and direct that environmental limits be determined for the region to an adequate standard, or to achieve specific aims, and that resource use and all activities must be within those limits.

Ecosystems and indigenous biodiversity

31. The PORPS 2021 intends, via its Long Term Vision (IM-O1), to manage all forms of plants and animals (whether native to New Zealand or introduced) and in doing so, achieve healthy, resilient and safeguarded natural systems. It is not defined what a 'natural system' is, but reference to 'natural and physical resources' in IM-O1 strongly suggests that introduced species are included within the concept and are acceptable where the whole natural system is healthy, resilient and safeguarded. This is consistent with the approach of the RMA, where the purpose refers to 'natural and physical resources', and explicitly references both indigenous species¹⁶ and the habitat of trout and salmon,¹⁷ in addition to discussing ecosystems and outstanding natural features, categories of water bodies and the environment in a manner that is inclusive of both indigenous and introduced species, in Part 2.
32. Within the PORPS 2021 wording used to discuss the protection, enhancement or restoration of ecosystems and habitat can be focused on those which are exclusively indigenous or native. Fish and Game's interpretation is that references to indigenous habitats and native ecosystems in the PORPS 2021 direct that habitats and ecosystems that are not wholly native or indigenous are not to be considered at all.
33. This runs the risk creating an unintentionally narrow focus as habitats and ecosystems that host only indigenous species are rare in Otago, so a focus on just those habitats and ecosystems effectively weakens protection of water bodies and terrestrial ecosystems generally. Introduced flora, such as gorse and introduced trees, provide habitat for indigenous species and are widely interspersed within Otago ecosystems. Furthermore, the concept of ecosystems includes fauna, so the abundance of introduced insects, animals and fish (most of which are not considered pests) means that Otago ecosystems are not entirely indigenous or native.
34. The end result is that using terminology like indigenous or native to describe broad ecological terms like habitat and ecosystems makes protection, enhancement, and restoration more, not less, difficult. Fish and Game supports the protection of ecosystems and indigenous biodiversity and recommends that these concepts are included in the ORPS 2021 to achieve the outcomes.

¹⁶ RMA section 6(c)

¹⁷ RMA section 7(h)

35. Fish and Game seeks relief that will:

- a. provide protection for Otago's ecosystems, indigenous biodiversity and habitats; and
- b. define the term natural environment so it is meaningful in the Otago Region.

The Freshwater Planning Instrument

1. Fish and Game's understanding is that the Freshwater Commission is to consider this FPI in accordance with the Freshwater planning process set out in sub-part 4 of the RMA. Section 80A requires that all FPIs go through that process, and that in this instance, the RPS (or parts of it) are a FPI the purpose of which is to give effect to the National Policy Statement for Freshwater Management in accordance with section 80A. Fish and Game notes however that the Otago Regional Council elected to exclude a suite of provisions directly relevant to giving effect to the NPSFM, including fundamental provisions implementing the NPSFM directives in respect of TMOTW, and outstanding water bodies for example. Fish and Game has however taken an integrated approach to this submission, and where relevant still address those fundamental aspects derived from the NPSFM.
2. Fish and Game notes its concern that the following provisions from ORC's section 42A Report version 31 October 2022 have not been included in the FPI, but instead are being considered in the "non-freshwater" part of the RPS, even though in Fish and Game's understanding they are directly relevant to only freshwater, and are relevant to implementing/giving effect to the National Policy Statement on Freshwater Management:
 - a. Definitions of Degraded (in relation to freshwater), Effects management hierarchy (in relation to natural wetlands and rivers), Freshwater or fresh water, Freshwater management unit or FMU, Lake, Natural wetland, Outstanding water body, River, Te Mana o te Wai, Water body, Wetland,
 - b. LF-WAI-P4 – Giving effect to Te Mana o te Wai
 - c. LF-FW-O8 – natural character (of wetlands), LF-FW-P8 – Identifying natural wetlands
 - d. LF-FW-P11 – Identifying outstanding water bodies, LF-FW-P12 – Protecting outstanding water bodies, LF-FW-M5 – Outstanding water bodies, APP1 Criteria for identifying outstanding water bodies
 - e. LF-FW-P13 – Preserving natural character, LF-FW-P14 – Restoring natural character
 - f. LF-FW-P13A – Effects management hierarchy (in relation to natural wetlands and rivers)

Reasons for submission

Statutory context

3. In its Section 32 Report, the ORC has outlined the documents and legislation that is relevant to the PORPS 2021. Fish and Game agrees with and adopts this list, with the exception of noting that the Central South Island Sports Fish and Game Management Plan 2012 - 2022 will also need to be considered.
4. Fish and Game has prepared its submission with the above documents and legislation in mind.

General relief sought

5. Fish and Game generally seek the following outcomes:
 - c. protects water bodies and freshwater ecosystems, including the habitat of trout and salmon, from the impacts of land use and restores them where they are degraded;
 - d. develops a framework for considering when protecting the habitat of trout and salmon is consistent with protecting the habitat of indigenous species and assists in managing species interactions where they are of concern;
 - e. require the RPS to take a hierarchical approach, with a priority on the natural environment;
 - f. remove ambiguous and unclear wording and replace with consistent, directive terms;
 - g. give effect to higher order documents, including by reconciling competing tensions;
 - h. recognise and provide for the way in which people connect with the environment, including recreation in and around water and harvesting food from water bodies;
 - i. define the term natural environment, which is used at critical points in the PORPS 2021, so it can be meaningful in a modern Otago context;
 - j. provide protection for the wide range of Otago ecosystems and habitats by removing the words 'indigenous' and 'native' where it is not logical;
 - k. remove references to 'environmental bottom lines' and 'environmental constraints' and instead use the term 'environmental limits' consistently;
 - l. explicitly acknowledge that water bodies that support recreation and amenity values are highly valued features;
 - m. significant reduction in length of Parts 1 and 2.

6. Specific changes to the provisions are set out below. In the alternative, Fish and Game seek additional and consequential changes that give effect to the general relief and outcome sought in the submission above, or that otherwise address the issues highlighted in the reasons for the submission.
7. In the alternative, Fish and Game seek deletion of the PORPS 2021.

Relief sought on specific provisions

8. In addition, Fish and Game seeks the below relief or alternative wording to the same effect.

Provision	Position	Reasoning	Relief Sought
Foreword or mihi	Support in part	The foreword reads too narrowly, as though the PORPS 2021 applies primarily to water bodies. The PORPS 2021 covers the totality of the natural and built environment in Otago, in an integrated fashion.	Reword and correct the focus of the Foreword
Definitions chapter	Support in part	Fish and Game support the provisions within chapter that are identified as FPI components and seek to retain the provision wording, subject to the comments below.	Retain, subject to relief below
Definition: natural environment	Seek insertion	<p>The term natural environment is used at critical points in the PORPS 2021, such as in IM-P2, but is never defined. Fish and Game’s experience is that any term including the word ‘natural’ (or variants of) is difficult to use in practice as it means different things to different people. This term could be usefully clarified. Fish and Game has drawn on and modified wording from the Natural and Built Environment Act Exposure Draft, which uses similar wording to that of natural and physical resources under the RMA. It is acknowledged that there is no legal basis for using this wording—it is simply that it is most useful.</p> <p>Because this term is related to, but broader than, that of natural and physical resources, consequential changes may be required to insert references to the natural environment in addition to or</p>	<p><u>Natural environment means:</u></p> <p><u>(a) land, water, air, soil, minerals, energy, and all forms of plants, animals and other living organisms, whether native to New Zealand or introduced, and their habitats,</u></p> <p><u>(b) ecosystems, their constituent parts and the natural processes that sustain these,</u></p> <p><u>(c) the natural landscape and landforms that are formed by the interactions between (a) and (b), and</u></p> <p><u>(d) excludes pests and domestic and farmed animals.</u></p> <p>Plus, consequential changes as referenced in the reasoning section.</p>

		in place of natural and physical resources, in provisions throughout the PORPS 2021, as needs be.	
Definition: minimise	Seek insertion	The term minimise is used in the PORPS 2021 but is not defined and the directive nature of the document could be improved if this were undertaken.	<u>Minimise means to reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</u>
Definition: precautionary approach	Seek insertion	<p>This term is used in numerous provisions of the PORPS 2021 and is commonly referenced in Otago planning processes already. Fish and Game’s experience is that a lack of clear definition has hindered the concept’s effective use in the past. This issue will be resolved by defining it within the PORPS 2021. To do so, Fish and Game has drawn on the NPS-FM 2020 section 1.6.</p> <p>Fish and Game acknowledges there will be reluctance to place a priority on the natural environment in (b), within the context of natural hazards decisions. However, this approach is consistent with the integrated management chapter provisions, particularly P2, which natural hazard precautionary approach provisions (such as HAZ-NH-P5) are not explicitly excluded from.</p>	<p><u>Precautionary approach means an approach that:</u></p> <p><u>(a) avoids not acting due to uncertainty about the quality of quantity of the information available, and</u></p> <p><u>(b) interprets uncertain information in a way that best supports the health, well-being and resilience of the natural environment</u></p>
Definition: restore	Seek insertion	<p>A direction to restore is used often in the PORPS 2021 and this intent is supported by Fish and Game. Fish and Game has long sought restoration of degraded¹⁸ environments and ecosystems. In Fish and Game’s experience, the concept has been difficult to implement because it is often unclear to what standard restoration should aim for. It is appropriate to resolve this issue within the PORPS 2021, and Fish and Game seeks relief that will provide guidance on what the term requires people to achieve.</p> <p>This proposed wording has been developed so that restoration is self-evidently not required when the object of restoration is</p>	<u>Restore means to return to a state of good health, well-being and resilience.</u>

¹⁸ The word is used in the general sense, as Fish and Game has sought restoration since long before the term ‘degraded’ came to be defined within national policy statements.

		<p>already in a state of good health, well-being and resilience, meaning that directive language can be used in provisions. This allows for consequential changes elsewhere in the PORPS 2021, so that language that adds additional uncertainty can be replaced with certain, positive directions. Fish and Game seeks such consequential changes be made.</p>	
SRMR Chapter	Support in part	<p>The National Planning Standards Regional Policy Statement ‘rehousing’ template refers to the issues section as being the engine room of the RPS, where issues are to be discussed, with priorities raised alongside potential solutions. At present, the PORPS 2021 does not achieve this.</p> <p>Aside from this point, Fish and Game support this chapter that have been identified as FPI components, subject to the comments below.</p>	<p>That all the relief sought by Fish and Game is generally reflected as solutions within the SRMR chapter, to be redrafted in its entirety.</p>
SRMR – Interacting with water bodies	Seek insertion	<p>The SRMR chapter does not discuss the way in which people in Otago interact with the environment for recreation, or otherwise value its amenity values, and gain wellbeing from it. While it is a positive, not negative issue, it is an issue of significance to the people of Otago (and others who visit the region) and should be represented within the SRMR chapter as a matter of priority.</p> <p>To be clear, this issue is not intended to detract from the need to protect and restore natural resources such that their life-supporting capacity is safeguarded. As discussed above with respect to TMOTW, Fish and Game seeks that all activities support the health and well-being of water bodies. In other relief, outside the FPI components, this has been applied to the concept of the natural environment.</p>	<p>Insert an additional issue to the SRMR chapter, as follows.</p> <p><u>SRMR-I12 – Social, cultural and economic wellbeing of Otago’s communities depends on use and development of natural and physical resources</u></p> <p><u>Statement</u></p> <p><u>The social, cultural and economic health and wellbeing of Otago’s people and communities relies on the ability of people being able to access, use and develop the region’s natural and physical resources.</u></p> <p><u>Context</u></p> <p><u>The social, cultural and economic wellbeing of Otago’s communities depends on use and development of natural and physical resources. Loss or degradation of resources</u></p>

		<p>I note also the relationships – positive and negative – between tourism and the environment and the community discussed in SRMR-19. In an example of this, many years, Fish and Game has implemented regulated fisheries in Central Otago to retain their remote or backcountry characteristics and protect them from over-use.</p>	<p><u>can diminish their intrinsic values and constrains opportunities for use and development now and into the future. Some of Otago’s resources are nationally or regionally important for their natural values and economic potential and so warrant careful management.</u></p> <p><u>Sustainable management under the RMA includes enabling social, economic and cultural wellbeing for present and future generations. Resource management decisions need to recognise that individual and community wellbeing depends on use, development and protection of natural and physical resources.</u></p> <p><u>Impact snapshot</u></p> <p><u>Environmental</u></p> <p><u>Subdivision, use and development of natural resources can result in appropriate environmental effects including net environmental benefits, particularly where that subdivision, use or development results in enhancement and restoration of degraded parts of the natural environment.</u></p> <p><u>Human use (associative) benefits of from human use of accessing and using natural resources contributes to the significant values of highly valued natural features and natural landscapes, and outstanding waterbodies.</u></p> <p><u>Enabling people to access and use natural resources results in significantly positive human health and well-being benefits.</u></p> <p><u>Social and economic</u></p> <p><u>Enabling people to access and use natural resources is required to support a prosperous regional economy.</u></p>
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			<p><u>Limiting people’s ability to access and use resources use can limit productive economic opportunities and adversely impact the health and well-being of Otago’s people and communities.</u></p> <p>And</p> <p>Amend</p> <p>SRMR-15: “... These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values <u>(including people’s wellbeing).</u>”</p> <p><u>And</u></p> <p><u>Amend</u></p> <p>SRMR-19: “The beauty, recreational opportunities and regional climate of Lakes Wanaka, Wakatipu, Hāwea and Dunstan and their environs <u>provides significant recreational benefits to people and</u> attract visitors and residents from around the region, the country and the world. This <u>supports human health and well-being and influx</u> brings economic benefit through ...”</p> <p>...</p> <p>“... significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. <u>Individual and community benefits associated with using the lakes are significant, including</u></p>
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			<p><u>from recreation which supports human health and wellbeing.”</u></p> <p>Alternatively, insert a narrower section related only to the benefits of human health and well-being benefits associated with accessing (i.e. transport to and within) and recreating in (i.e. using) natural resources/natural environment.</p> <p>Alternatively, Fish and Game seek that the wording in SRMR 15 and 16 are altered to recognise and provide for the links between health, well-being and recreation – including angling and hunting. In addition, links between the use and values of the water body should be made clear. If this alternative is used, amend as below:</p> <p>SRMR-15: ... 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.</p> <p><u><INSERT LINE TO CREATE NEW PARAGRAPH></u></p> <p>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, <u>health, landscape and aesthetic</u> values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values. <u>The way in which people interact with water is one aspect of why a waterbody may be considered a highly valued natural feature.</u></p>
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			<p>SRMR-16: ... For the wider community, water is a source of kai and of recreation, including swimming, fishing and water sports. <u>There are multiple dimensions to the way water quality impacts on peoples’ interaction with water bodies, including environmental, health, landscape, and aesthetic factors.</u> Otago’s rivers, lakes, estuaries and bays are important destinations for recreational use including swimming, fishing and water sports. <u>The way in which people interact with water is one aspect of why a waterbody may be considered a highly valued natural feature.</u> Eighty-two per cent of Otago’s rivers and lakes are swimmable. Where water quality cannot support <u>these recreation</u> activities, the lifestyle of those living in Otago is impacted.</p>
SRMR-15	Support in part	<p>The environmental section should include reference to the health and well-being of water bodies being affected by water demand, in addition to the ecosystems within water bodies. Doing so will make the passage consistent with the Te Mana o te Wai priority on “the health and well-being of water bodies <i>and</i> freshwater ecosystems.”¹⁹</p> <p>In addition, the well-being of people should be included for the reasons discussed above.</p>	<p>Add sentence to the Environmental section: “... between species and their habitat. <u>The sum of these impacts affects the overall health, well-being and resilience of the water body.</u> How much an ecosystem ...”</p>
RMIA-WAI-I1, RMIA-WAI-I3	Support	<p>Fish and Game notes that RMIA-WAI-I1 refers to mahiki kai being carried out in artificial habitats and switching to exotic species such as trout and salmon, which is generally supported by Fish and Game.</p>	<p>Retain</p>

¹⁹ NPS-FM 2020 2.1(1)(a)

LF-WAI Chapter	Support in part	Fish and Game support the provisions within chapter that have been identified as FPI components and seek to retain the provision wording, subject to the comments below.	Retain, subject to relief below
LF-WAI-O1	Support in part	As discussed above, Fish and Game seek that the way people connect with water bodies be recognised and provided for within the PORPS 2021.	... (4) water and land have a connectedness that supports and perpetuates life, <u>and</u> (5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports, <u>(6) people are enabled to use, enjoy and connect meaningfully with water bodies to further their amenity and well being, including through recreation and harvesting food, and</u> <u>(7) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.</u>
LF-WAI-P1	Support in part	The word 'bathing' in (2) for immersive activities in rivers is rarely used in a modern English language context and would be better replaced with 'recreation'.	... (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 <u>bathing recreation</u>), and ...
LF-VM Chapter	Support in part	Fish and Game support the provisions within chapter that are identified as FPI components and seek to retain the provision wording, subject to the comments below.	Retain, subject to relief below

<p>LF-VM-O2 to LF-VM-O6</p>		<p>Fish and Game notes that for a vision be clear as to the outcomes sought, it must set aspirational goals that are difficult to achieve but not impossible.²⁰ A vision is also most effective also provide a narrative for people to aspire towards. This is currently missing, and the vision objectives don't paint a holistic vision for outcomes in the catchments, they are more disparate parts that do not add up to a whole.</p> <p>Even more worryingly, some vision objectives cite basic aspects of river management within them, such as restoring the gravel bed, or restoring natural form and function, while these are absent in others. The implication of this is that where such basic goals are not discussed, they need not be achieved.</p> <p>Fish and Game seeks that the visions provide a holistic picture of how all rivers will be managed in future to provide for their health, well-being and resilience. This could be achieved via the following options:</p> <ul style="list-style-type: none"> - Inserting an overarching vision that can apply to every river, with specific additions set out in. LF-VM-O2 to LF-VM-O6 should stand in addition to provide vision goals only where they are specific to that FMU or Rohe. - Merging an overarching vision statement as above with the objective framework in the PORPS. Again, LF-VM-O2 to LF-VM-O6 would stand in addition. - Ensuring that LF-FM-O2 to LF-VM-O6 all encapsulate each point from an overarching vision. This approach will result in significant duplication of text. <p>Fish and Game is open to these options and others, to achieve its relief. It is understood that this is an issue for other parties</p>	<p>Amend such that the visions holistic picture of how all rivers will be managed in future to provide for their health, well-being and resilience.</p> <p>For example:</p> <p>LF-VM-OA2 – All of Otago catchment vision</p> <p><u>By no later than 2040, in all Otago catchments:</u></p> <p><u>(1) water bodies are protected at, or returned to a state of good health, well-being and resilience,</u></p> <p><u>(2) activities relating to water support the health, well-being and resilience of affected water bodies,</u></p> <p><u>(3) the natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour,</u></p> <p><u>(4) ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored,</u></p> <p><u>(5) wetland, estuary and lagoon extent has been restored as much as practical where it has been lost, and their quality is protected and restored,</u></p> <p><u>(6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments,</u></p> <p><u>(7) the habitat of trout and salmon is protected and restored, and trout and salmon are able to migrate easily within and between catchments, insofar as each goal is consistent with that of indigenous species,</u></p>
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²⁰ NPS-FM 2020 section 3.3(2)

		<p>and it may be useful to hear their perspective on this point before taking a position.</p> <p>Fish and Game has provided potential wording for such an over-arching vision objective and notes that the wording proposed may need to be expanded to be inclusive of vision wording for other parties which Fish and Game cannot speak for. This wording can be adapted to any of the options listed above.</p> <p>Whatever the result, Fish and Game also seeks relief to resolve drafting issues within the vision objectives. Many vision limbs aren't formatted logically. For example, LF-VM-O2(7)(b)(ii) requires that land use be innovative in addition to sustainable. In Fish and Game's experience, sustainable land use may arise from 'traditional' and decidedly not innovative practices low stocking rate high country grazing enterprises. A land use practice doesn't have to be cutting edge to be sustainable.</p> <p>Finally, the dates by which the visions are to be achieved is unnecessarily distant. For some limbs within the visions, such as LF-VM-O2 (4) and (5) are not time bound at all, despite having clear goals that could be set to a timeframe. Particularly in Central Otago catchments affected by excessive abstraction, where deemed permit holders have already been given 30 years to move towards more sustainable practices, movement should be quicker. Fish and Game seeks that all relevant goals within the vision objectives be achieved by at most 2040. For some catchments, achievement of the visions may still need to occur sooner.</p>	<p><u>(8) food is available to be harvested from water bodies in abundance and is safe to consume,</u></p> <p><u>(9) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies,</u></p> <p><u>(10) there are no direct discharges of waste water to water bodies, and</u></p> <p><u>(11) fresh water is managed in accordance with the LF-WAI objectives and policies.</u></p> <p>Consequential relief to remove parts of LF-VM-O2 to LF-VM-O6 that duplicate direction in LF-VM-AO2.</p> <p>Specific drafting of this consequential relief and relief required to remove drafting issues sought by Fish and Game has not been provided by Fish and Game as the potential consequential amendments required will be comprehensive and has the capacity to make and specific drafting changes redundant.</p>
LF-FW Chapter	Support in part	Fish and Game support the provisions within chapter that have been identified as FPI components and seek to retain the provision wording, subject to the comments below.	Retain, subject to relief below

LF-FW-O8	Support in part	Fish and game supports the intent of this provision and seeks that the habitat of indigenous species and trout and salmon is protected and restored, and that the health, well-being and resilience of water bodies is prioritised, all for the reasons given above.	<p>In Otago’s water bodies and their catchments:</p> <p>...</p> <p><u>(1a) the health, well-being and resilience of water bodies is prioritised,</u></p> <p>...</p> <p>(4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected <u>and restored, and</u></p> <p><u>(4a) the habitat of trout and salmon, including fish passage, is protected and restored as part of the health, well-being and resilience of water bodies, and</u></p> <p>(5) the significant and outstanding values of Otago’s outstanding water bodies are identified and protected.</p>
FL-FW-O9, LF-FW-P9 and LF-FW-P10	Support in part	A large percentage of wetland extent has been lost in Otago. Only 24% of the original wetland area remains. ²¹ What remains is intrinsically valuable. For this reason, Fish and Game is generally supportive of the direction to protect and restore natural wetlands.	Relief that will protect and restore, or provide for the promotion of restoration, of wetlands that are not considered ‘natural’.

²¹ Sourced from the Forest and Bird analysis of MfE wetland data. The entry for Otago specific information is below:

“Otago

- Before human occupation the Otago region had 110,804 hectares of wetland ecosystem.
- Only 27,050 hectares remain, or 24% of the original wetland area.
- The Waipori-Waihola wetland covers 2000 ha, and is one of the largest and most significant remaining freshwater wetlands in New Zealand.

Lake Waihola is currently classified as the worst water quality “very poor” or supertrophic particularly because of sewage, stormwater, dairy shed and farm runoff. Drainage schemes have drained the majority of the original wetlands although the Sinclair Wetlands between the two lakes has survived and is protected under a QE II covenant.”

<https://www.forestandbird.org.nz/resources/world-wetlands-day-forest-bird-release-maps-showing-extent-wetlands-crisis>

	<p>However, this approach is problematic in that it only relates to wetlands identified as ‘natural’ in the NPS-FM. This leaves a segment of wetlands, as defined using the RMA interpretation, which will receive no specific protection and no specific restoration direction.</p> <p>It is likely that there is a great deal of overlap between wetlands which are no considered ‘natural’ and those which need restoration. Wetlands which fall through the natural wetland definition due to introduced species cover, do so because they are already highly modified.</p> <p>Fish and Game notes that there is no current information on the proportion of wetlands in Otago that are considered natural or not. As such, it is unclear what the outcome will be when <i>only</i> protecting and restoring natural wetlands, and whether this will be sufficient to satisfy the requirements of the RMA, including its purpose.</p> <p>Fish and Game seeks that the wetland provisions be amended so that they protect and restore, or provide for the promotion of restoration, of wetlands that are not considered ‘natural’.</p> <p>In addition to this, Fish and Game has identified a matter of clarity for LF-FW-09. Above, Fish and Game has discussed how the word ‘indigenous’ can be problematic when referring to ecosystems and habitats. It is seeking changes to clarify this issue throughout the document. Fish and Game is not seeking changes to the phrase ‘indigenous ecosystem types’, as the term is more encompassing and can include an intermixing of introduced and native species, which is likely to be found in natural wetlands.</p>	<p>And</p> <p>Amend</p> <p>LF-FW-09</p> <p>...</p> <p>(2) there is no decrease in the range and diversity of <u>habitats and</u> indigenous ecosystem types <u>and habitats in</u> natural wetlands,</p> <p>...</p>
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		<p>With that said, it is ambiguous as to whether (2) refers to 'indigenous habitats' or just 'habitats'. Fish Game prefers that the latter is used and seeks relief to resolve this drafting issue.</p> <p>Fish and Game notes its concern that LF-FW-O10 regarding natural character of wetlands, and LF-FW-P8 regarding identifying wetlands, have been omitted by ORC from the FPI, and is concerned that those omissions may result in issues with respect to ensuring an integrated set of provisions.</p>	
LF-FW-P7	Support in part	<p>Fish and Game seeks relief in line with elsewhere in this submission to insert wording to:</p> <ul style="list-style-type: none"> - Require the health, well-being and resilience of water bodies is protected and restored; - Ensure that the direction for habitats of indigenous species includes restoration; - That all activities related to freshwater support the health, well-being and resilience of water bodies; and - That the habitat of trout and salmon is protected in a manner consistent with Policies 9 and 10 of the NPS-FM - Wild harvested food is added alongside the items in (4), as it is important that people do not get sick when eating any food from water bodies. <p>In addition, Fish and Game has identified a gap in the provision, in that freshwater is allocated within environmental limits but discharges to freshwater are not considered within a similar framework. Relief is sought to address this point.</p> <p>These amendments are intended to better give effect to higher order documents.</p>	<p>(1) the health, and well-being and <u>resilience</u> of water bodies is <u>maintained or, if degraded, improved protected and restored</u>,</p> <p>(1a) all activities related to freshwater support the health, well-being and resilience of water bodies,</p> <p>(2) the habitats of indigenous species associated with water bodies are protected <u>and restored</u>, including by providing for fish passage</p> <p>(2a) the habitat of trout and salmon, including fish passage, is protected and restored insofar as it is consistent with (2),</p> <p>...</p> <p>(4) mahika kai, <u>wild harvested food</u> and drinking water are safe for human consumption,</p> <p>(5) existing over-allocation is phased out and future over-allocation is avoided, and</p> <p>(6) fresh water is allocated within environmental limits and used efficiently, and</p> <p><u>(7) discharges to freshwater are allocated within environmental limits.</u></p>

LF-FW-M6	Support in part	<p>For reasons given above, Fish and Game seeks relief to:</p> <ul style="list-style-type: none"> - specifically protect and enhance access to and recreational use of water bodies, recognising that it is a part of human amenity and well-being - require that activities should operate within limits that support the health, well-being and resilience of water bodies. <p>These changes reflect and help to give effect to the relief that Fish and Game have sought elsewhere.</p>	<p><u>(4)(g) human amenity and well-being through protecting and enhancing access to, and recreational use, of water bodies, and</u></p> <p>...</p> <p><u>(5)(d) manage the adverse effects on water bodies that can arise from the use and development of land, and</u></p> <p><u>(5)(e) will enable activities to support the health, well-being and resilience of water bodies when operating within limits, and</u></p> <p>...</p>
LF-FW-M7	Support in part	<p>Stormwater systems, both existing and new, continue to have adverse effects on water bodies in Otago. For new systems, adoption of best practice management tools and designs can reduce that adverse effect greatly. Resolving legacy issues associated with existing stormwater systems will require time and significant staged investment. Fish and Game seeks relief that will recognise these points and direct district plans to require action.</p>	<p><u>(1) ...</u></p> <p><u>(2) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the existing subdivision, use or development of land in urban areas,</u></p> <p><u>(3) (3a) require the adoption of water sensitive urban design techniques when managing new subdivision, use or development or land in urban areas, and</u></p> <p><u>(4) ...</u></p>
LF-FW-Mx	Add new method	<p>The addition of proposed LF-FW-Mx gives a clear pathway for how the management of species interactions and populations is undertaken to implement the policies and achieve the objectives of the chapter. Without this process, it is difficult to coordinate integrated management, as a number of parties that have statutory functions. Current legislation such as the Conservation</p>	<p>LF-FW-Mx – Identifying and managing species interactions between trout and salmon and indigenous species</p> <p>(1) Local authorities:</p> <p>(a) when making decisions involving the interactions between trout and salmon and indigenous species, will have particular regard to the recommendations of the Department of</p>

		<p>Act 1987 provides additional support for this to be achieved should it be considered appropriate.</p>	<p>Conservation, the Fish and Game Council relevant to the area, Kāi Tahu, and the matters set out in LF-FW-Mx(2)(a) to (c), and</p> <p>(2) Otago Regional Council will work with the Department of Conservation, the relevant Fish and Game Council and Kāi Tahu, to:</p> <p>(a) identify areas where the protection and restoration of the habitat of trout and salmon, including fish passage, will be consistent with the protection and restoration of the habitat of indigenous species, and</p> <p>(b) identify areas where the protection and restoration of the habitat of trout and salmon will not be consistent with the protection and restoration of habitat of indigenous species, and</p> <p>(c) for areas identified in (b), develop provisions for any relevant action plans(s) prepared under the NPSFM, including for fish passage, that will at minimum:</p> <p>(i) determine information needs to manage the species, and</p> <p>(ii) determine short, medium and long term objectives, and</p> <p>(iii) determine appropriate management actions that will achieve objectives determined in (ii) and account for habitat needs, and</p> <p>(iv) use tools available within the Conservation Act 1987, where appropriate.</p>
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LF-LS Chapter	Support in part	Fish and Game support the provisions within chapter that have been identified as FPI components and seek to retain the provision wording, subject to the comments below.	5) Retain, subject to relief below
LF-LS-M11	Support in part	<p>The development and use of farm plans to assist in achieving the outcomes of this chapter is considered a useful tool and should be relied on to help landowners effectively manage farming practices.</p> <p>Appropriately managing CSAs and limiting high-risk activities on steep slopes should be included as methods to achieve the environmental outcomes for soil and water quality. The importance of managing these areas for water quality and soil health is well-documented and researched and this should be reflected in the management of land in the region.</p>	<p>...</p> <p>(a) the development and implementation of certified freshwater farm plans <u>as required by the RMA and any regulations;</u></p> <p>(b) the adoption of practices that reduce the risk of sediment and nutrient loss to water, including by minimising the area and duration of exposed soil, using buffers, <u>avoiding land uses which result in any pugging in critical source areas, limiting high risk activities on steep slopes</u> and actively managing critical source areas,</p> <p>...</p>
MAP1	Support	<p>It appears that MAP1 is the only place where the FMUs and Rohe are defined. In this sense it is useful. It would be helpful to add accompanying descriptive text defining the spatial extent of the FMUs and Rohe. For example, by listing the catchments, or categories of catchments, that are included. Categories might need to be used for FMUs which contain many smaller catchments, such as North Otago, Dunedin & Coast, and Catlins.</p> <p>Specific wording has not been provided.</p>	Provide an accompanying descriptive text defining the spatial extent of the FMUs and Rohe.

9. In addition, Fish and Game seeks relief, including wording and actions that will have the same effect, to improve the usability of the document. The following points are general but can be applied to the relevant FPI components.

Provision	Position	Reasoning	Relief Sought
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Statutory managers of freshwater sports fish, game birds and their habitat

Otago Fish and Game Council & Central South Island Fish and Game Council

www.fishandgame.org.nz

Part 1 and Part 2	Support in part	Text within the opening parts of the document is very lengthy, making the document arduous to read. Fish and Game acknowledge that the layout of the PORPS 2021 will be dictated by direction of the NPF 2019 however, within this framework improvements can be made.	Make text within these parts succinct to aid in readability. Suggested changes have not been made by Fish and Game, as they will likely be substantial and best proffered by the ORC.
Navigation	Support in part	Provision codes in the pdf version of the PORPS 2021 don't easily work with search functions in common internet browsers and pdf viewers. The document would be much more navigable if the provision codes were quickly searchable. It may be that en or em dashes are used when there are few well-known keyboard shortcuts to type these quickly.	Format the provision codes so they can be navigated to via search functions on common internet browsers and pdf viewers.
Interpretation	Support in part	<p>Most definitions in the PORPS 2021 are simple references to definitions in other documents. The current format where the full definition is re-written for the PORPS 2021 makes the interpretation difficult to navigate. When adopting a definition from another document, it is common for policy documents and legislation to instead simply reference the definition, for example, in the NES-FW 2020:</p> <p><i>"Natural wetland has the meaning given by the National Policy Statement for Freshwater Management"</i>²²</p> <p>Fish and Game suggests that this format be used in the PORPS 2021, as users can easily look up the definition in the referenced document. It is acknowledged that this is more difficult for readers using paper copies. To account for this, a separate glossary document listing the full meanings could be provided by the ORC. Hyperlinks sending computer users to this separate glossary might also prove to be useful for users of electronic copies.</p>	<p>The definitions section be refined so that it is smaller and easier to use, within the bounds of what is possible under the NPF 2019 and national planning standard.</p> <p>A marked up copy of relief is not provided as the action requested to be taken is self-evident.</p>
Explanation, principle reasons and	Oppose	Fish and Game understands that these sections are required by the national planning standard template, but considers the are currently drafted as being too long, and not clear.	Delete and redraft these sections

²² NES-FW 2020, section 3

anticipated environmental results sections			
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