



<b>SUBMISSION ON PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021 – Freshwater Planning Instrument provisions</b>	
<b>TO:</b>	Otago Regional Council
<b>DATE:</b>	29 November 2022
<b>NAME OF SUBMITTER:</b>	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively <b>Kāi Tahu ki Otago</b> or <b>Kā Rūnaka</b> )
<p>This is a submission on the Freshwater Planning Instrument provisions of the <b>Proposed Otago Regional Policy Statement 2021 (the PORPS)</b>.</p> <p><b>Kāi Tahu ki Otago could not</b> gain an advantage in trade competition through this submission.</p> <p><b>Kāi Tahu ki Otago support</b> the overall direction of the PORPS but seek some amendments, as described below.</p> <p><b>Kāi Tahu ki Otago do</b> wish to be heard in support of this submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.</p>	
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## 1. Introduction

### *Mana whenua in respect of the Otago region*

- 1.1 Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga are mana whenua within the Otago region.
- 1.2 The takiwā of Te Rūnanga o Moeraki is based at Moeraki and extends from the Waitaki River to the Waihemo (Shag) River. The takiwā of Kāti Huirapa Rūnaka ki Puketeraki centres on Karitāne and extends from the Waihemo River (Shag River) to Purehurehu Point (north of Heyward Point). The takiwā of Te Rūnanga o Ōtākou centres on Ōtākou and extends from Purehurehu Point to Te Matau (the Clutha River). The takiwā of Hokonui Rūnanga centres on the Hokonui region and includes a shared interest in the lakes and mountains between

Whakatipu-Waitai and Tawhitarere with other Murihiku Rūnanga and those located from Waihemo southwards.

- 1.3 This submission is supported by Te Rūnanga o Ngāi Tahu (Te Rūnanga). The submission should be read in conjunction with the submission of Te Rūnanga o Ngāi Tahu on behalf of Ngāi Tahu Whānui as a whole, and the submission of Te Ao Marama Incorporated on behalf of Ngāi Tahu ki Murihiku Papatipu Rūnaka.

#### *Tino rakatirataka recognised under the Ngāi Tahu Settlement*

- 1.4 The Ngāi Tahu Claims Settlement Act 1998 (Settlement Act) gives effect to the Deed of Settlement signed by the Crown and Te Rūnanga o Ngāi Tahu on 21 November 1997. The purpose of these documents was to:

- Confirm the Treaty relationship, obligations and responsibilities between Kāi Tahu and the Crown. The settlement marked the beginning of a “*a new age of co-operation*” between Kāi Tahu and the Crown. The Otago Regional Council must work in partnership with Te Rūnanga and Papatipu Rūnaka;
- Achieve a final settlement of Kāi Tahu historical claims against the Crown as outlined in the settlement; and
- Confirm Kāi Tahu tino rakatirataka. This includes an express acknowledgement (in both the Settlement Act and the earlier Deed) that:

*“The Crown apologises to Ngāi Tahu for its past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries, and, in fulfilment of its Treaty obligations, the Crown recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui.”*

- 1.5 The Deed of Settlement and Settlement Act also acknowledge the requirement for Kāi Tahu to express its traditional relationship with the natural environment and to exercise its kaitiaki responsibilities.

#### *Rakatirataka and kaitiakitaka*

- 1.6 Rakatirataka and kaitiakitaka are founded in the exercise of mana, and the status as mana whenua that is inherited through whakapapa. From the status of mana whenua comes the exercise of rakatirataka, which is linked to concepts of leadership, authority to make decisions and service to community. The status of mana whenua and the exercise of rakatirataka are expressed and enforced in relation to te taiao through the practice of kaitiakitaka.
- 1.7 Kaitiakitaka is not merely about guarding or protecting, but about acting as an agent for environmental protection and decision-making, on behalf of tūpuna and mokopuna. As expressed in the whakataukī, Mō tātou, ā, mō kā uri a muri ake nei, the focus is on ensuring environmental sustainability for future generations. Concepts and practices related to tikaka, mātauraka and maumaharataka provide a context for environmental management, linking the actions of today to the lessons and experiences of tūpuna in the past.

- 1.8 Rather than being a cultural preference for Kāi Tahu, the practice of kaitiakitaka is a cultural imperative. The status of mana whenua imposes rights and responsibilities in relation to te taiao. The right to use natural resources for sustenance and prosperity is balanced with the responsibility to care for the environment to ensure long-term sustainability.
- 1.9 The right of Kāi Tahu to manage lands and taoka under their rakatirataka was guaranteed under Article 2 of Te Tiriti o Waitangi. Implicit within this guarantee is the recognition of the mana of Kāi Tahu, and the exercise of their mana and rakatirataka in relation to te taiao through their role as kaitiaki whenua. The right of Kāi Tahu to act as rakatirataka in their takiwā still exists today, as recognised by the Kāi Tahu Settlement.
- 1.10 Section 2 of the Resource Management Act 1991 (RMA) provides the interpretation of tikaka/tikanga and kaitiakitaka/kaitiakitanga for the purposes of the RMA:
- tikanga Māori means Māori customary values and practices
  - kaitiakitanga means the exercise of guardianship by the tangata whenua of an area in accordance with tikanga Māori in relation to natural and physical resources; and includes the ethic of stewardship.
- 1.11 Section 7 of the RMA requires consent authorities to have ‘particular regard’ to kaitiakitaka in a manner that respects and accounts for tikaka unique to each iwi exercising kaitiakitaka within their rohe.
- 1.12 The Kāi Tahu ki Otago Natural Resource Management Plan 2005 and the Waitaki Iwi Management Plan 2019 are the principal resource management planning documents for Kāi Tahu ki Otago and the embodiment of Kāi Tahu rakatirataka and kaitiakitaka. The kaupapa of the plans is ‘ki uta ki tai’, which reflects the holistic Kāi Tahu ki Otago philosophy of resource management.
- 1.13 The plans express Kāi Tahu ki Otago values, knowledge and perspectives on natural resource and environmental management issues. While the plans are first and foremost planning documents to assist Kāi Tahu ki Otago in carrying out their kaitiaki roles and responsibilities, they are also intended to assist others in understanding tākata whenua values and policies.
- 1.14 Kāi Tahu ki Otago request that this submission is afforded status and weight appropriate to recognise their rakatirataka and exercise of kaitiakitaka over the Otago region.

## **2.0 Consultation with Mana whenua**

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- 2.1 Kāi Tahu ki Otago acknowledge the constructive approach that has been taken by the Otago Regional Council in developing the PORPS. Aukaha staff, on behalf of Kāi Tahu ki Otago, have contributed to identification of issues to be addressed and to drafting of the provisions at all stages of development of the document. Aukaha staff and Kā Rūnaka have greatly valued the efforts made by Otago Regional Council staff to recognise and provide for mana whenua values, rights and interests through the development of the PORPS.

### 3.0 General submission

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- 3.1 Kā Rūnaka strongly support the recognition of the mana and rakatirataka of Kāi Tahu, and their status as partners under Te Tiriti o Waitangi. This recognition of partnership was further expressed by Otago Regional Council through a partnership approach to the drafting of key aspects of the PORPS, with Aukaha as our agents.
- 3.2 The relationship of Kāi Tahu to wai māori (freshwater) is central to our culture and identity, and as described in RMIA-WAI, Kā Rūnaka have had longstanding concerns about the effects of past freshwater management on this relationship. Kā Rūnaka appreciate the opportunity that has been provided by Otago Regional Council to contribute to development of the Land and Freshwater provisions to reflect the relationship and to address the concerns.
- 3.3 Kā Rūnaka support the strong focus on Te Mana o te Wai and on sustaining the relationship of mana whenua with wai māori. In general, Kā Rūnaka consider that the Land and Freshwater provisions appropriately recognise and reflect the relationship of Kāi Tahu ki Otago to freshwater and provide clear direction on what is required to give effect to the National Policy Statement for Freshwater Management 2020 (NPSFM 2020).
- 3.4 Kā Rūnaka strongly support the focus on integrated management in the PORPS. This is consistent with the Kāi Tahu understanding that all parts of the environment (te taiao) are interconnected, and that it is important to reflect this through holistic management. A holistic approach to managing te taiao must value all parts of the natural environment, including fresh and coastal waters, indigenous species and ecosystems, whenua/soil and air, and recognise and reflect the interconnectedness between these components. Some specific amendments are requested to better reflect a holistic, integrated management approach.
- 3.5 In general, Kā Rūnaka support the focus of the freshwater visions set out in the LF-VM objectives. However, we retain a desire for a consistent and holistic vision for freshwater to apply across all Freshwater Management Units (FMUs). The first preference of Kā Rūnaka is to have an overarching vision for key values that applies to all FMUs, and we request the opportunity to work with ORC to restructure the LF-VM objectives and LF-FW-O8 to frame such a vision. If a completely separate vision is to be retained for each FMU, Kā Rūnaka request that the visions be reviewed to make them more consistent. Each of the visions should address all the components that contribute to supporting Te Mana o te Wai and the relationship of Kāi Tahu with wai māori. Distinctions between the visions for particular FMUs or rohe should only be made where a matter is clearly specific to that FMU or rohe.
- 3.6 An important component of the relationship of mana whenua with wai māori is the ability to pass on mātauraka (the knowledge of the resource, its use and the way it should be managed) to the next generation. Degradation of water bodies and the mahika kai they support has significantly affected the ability for mana whenua to pass on mātauraka. Kā Rūnaka have a strong desire for degradation to be reversed and visions to be achieved within a generation, so that the relationship can be kept alive for the next generation. To achieve this, Kā Rūnaka consider that timeframes for action should require practices to change within 10 years and visions to be achieved within 20 years.

- 3.7 Kā Rūnaka support the focus in the LF-VM provisions and elsewhere on improving water quality to make it safe for human contact. However, it is equally important to mana whenua that mahika kai species do not contain contaminants that would make them unsafe to eat. To enable harvest of food, the water body must also be safe for whānau to enter – this includes being sufficiently clear of sediment that the location of the bed can be ascertained. Some specific amendments are requested to address this matter.
- 3.8 The significant loss of wetlands in Otago has had devastating effects on mahika kai and indigenous biodiversity and has also affected water yield and flood behaviour. Kā Rūnaka support the provisions in the PORPS to protect remaining wetlands and reverse the degradation that has occurred. Kā Rūnaka consider this appropriately reflects the direction in the NPSFM 2020 and recognises the key role of wetlands in supporting catchment function and mahika kai.
- 3.9 The use of te reo Māori throughout the document is welcomed by Kā Rūnaka. However, the position of Kā Rūnaka is that the use of te reo should reflect the perspectives and values of Kāi Tahu. Amendments have been requested in relation to the following aspects of Māori language usage:
- (a) To correct language use that does not adhere to accepted orthographic conventions for te reo Māori, including correct use of tohutō (macrons), and initial capitalisation. As in formal writing conventions for English, initial capitalisation is only used for names and proper nouns;
  - (b) To express the strong preference of Kā Rūnaka that Māori place names are rendered to reflect the traditional names. Kā Rūnaka wish to see historic misspellings of place names like Taiari (Taieri) and Waipōuri (Waipori) amended, and the use of tohutō in place names like Waikōuaiti normalised in the PORPS.

## 4.0 Specific Submissions

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- 4.1 Submissions specific to particular provisions are shown in Appendix 1.
- 4.2 Kāi Tahu ki Otago generally support the approach taken in the PORPS, and particularly the progress made in recognising and providing for mana whenua rights, interests and values. Unless otherwise specified in Appendix 1, Kāi Tahu ki Otago seek that the provisions are retained.
- 4.4 If other submitters seek to change any provisions, we retain an interest across the entire PORPS.

Nāhaku noa,  
nā



**Dr Kate Timms Dean**

General Manager: Mana Taiao  
Aukaha (1997) Ltd

Date: 29 November 2022

## Appendix 1: Kāi Tahu ki Otago submissions on specific provisions of the PORPS

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
<b>Interpretation - Definitions</b>			
Certified freshwater farm plan	Support	The definition is consistent with the RMA definition.	Retain as notified
Drinking water	Support	The definition is consistent with the definition in the National Planning Standards.	Retain as notified
National Objectives Framework	Support	The definition is consistent with the definition in the NPSFM 2020.	Retain as notified
Natural hazard works	Support	The definition is consistent with the definition in the NESF 2020.	Retain as notified
Other infrastructure	Support	The definition is consistent with the definition in the NESF 2020.	Retain as notified
Over-allocation	Support	The definition is consistent with the definition in the NPSFM 2020.	Retain as notified
Specified infrastructure	Support	The definition is consistent with the definition in the NPSFM 2020.	Retain as notified
Specified rivers and lakes	Support	The definition is consistent with the definition in the NPSFM 2020.	Retain as notified
Wetland utility structure	Support	The definition is consistent with the definition in the NESF 2020.	Retain as notified
<b>SRMR – Significant resource management issues for the region</b>			

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
SRMR-15	Support	This is a significant issue that needs to be addressed to give effect to the NPSFM 2020.	Retain as notified
SRMR-16	Support	This is a significant issue that needs to be addressed to give effect to the NPSFM 2020.	Retain as notified
SRMR-19	Support	This is a significant issue that needs to be addressed to give effect to the NPSFM 2020.	Retain as notified
<b>RMIA – Resource management issues of significance to iwi authorities in the region</b>			
RMIA-WAI-11 – The loss and degradation of water sources	Support	Kā Rūnaka support the expression of the issues of significance to Kai Tahu in Otago, which is consistent with the content of the relevant iwi management plans.	Retain as notified
RMIA-WAI-13 – The effects of land and water use	Support	<p>Kā Rūnaka support the expression of the issues of significance to Kai Tahu in Otago, which is consistent with the content of the relevant iwi management plans.</p> <p>However, we request amendments to improve clarity and provide further explanation about the combination of factors contributing to loss of mahika kai.</p>	<p>Amend as follows:</p> <p><i>Mahika kai is the gathering of foods and other resources, the places where they are gathered, and the practices used in doing so.... It represents a <u>significant loss for mana whenua and a diminishing 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. Inadequate regulation of commercial fishing of tuna (eels) and inaka (whitebait) has also exacerbated the</u></i></p>



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			<u>impacts of degradation and loss of habitat from land and water use activities on remaining populations of these species.</u>
<b>LF – Land and freshwater</b>			
Objective LF-WAI-O1 Te Mana o te Wai	Support with amendment	<p>See paragraphs 3.2 to 3.4 above.</p> <p>The objective appropriately recognises and reflects the relationship of Kāi Tahu ki Otago to freshwater.</p> <p>The objective appropriately recognises the connectedness between land and water, but amendments are proposed to:</p> <ul style="list-style-type: none"> <li>ensure that the connectedness to coastal waters is also clearly recognised.</li> <li>recognise that (as set out in Section 1.3 of the NPSFM) responsibilities to support Te Mana o te Wai are not confined to Kāi Tahu but extend to all people.</li> </ul>	<p>Amend as follows:</p> <p><i>The mauri of Otago’s water bodies and their health and well-being is protected and restored ... and the management of land and water recognises and reflects that: ...</i></p> <p>(1) <u>freshwater, <del>and</del> land and coastal waters</u> have a connectedness that supports and perpetuates life ...</p> <p>Add further clause to read:</p> <p><u>(6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.</u></p>
Policy LF-WAI-P1 Prioritisation	Support with amendment	<p>See paragraph 3.3 above.</p> <p>The policy is an appropriate way to achieve the objectives of this PORPS and to give effect to the NPSFM 2020.</p> <p>However some amendments are sought to improve clarity.</p>	<p>Amend as follows:</p> <p><i>In all management of fresh water in Otago, prioritise:</i></p> <p>(1) <i>first, the health and well-being of water bodies, freshwater ecosystems, te hauora o te wai, and the contribution of this to te hauora o te taiao, and the exercise of mana whenua to uphold these, ...</i></p>

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
			<i>(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 <del>harvested</del> resources <u>harvested from the water body</u>) and immersive activities (such as harvesting resources and bathing), and ...</i>
Principal reasons LF-WAI-PR1	Support with amendment	<p>See paragraphs 3.1 to 3.3 above.</p> <p>The text refers to involving takata whenua in freshwater planning and management. Takata whenua is a broad term that applies to all Māori. The objective, policies and methods direct that, in Otago, involvement will primarily be by mana whenua, who have the rakatirataka authority and kaitiakitaka responsibility to care for wai māori. Ka Rūnaka request an amendment to reflect this.</p> <p>A grammatical amendment is also proposed to add to clarity.</p>	<p>Amend as follows:</p> <p>Paragraph 1, 2<sup>nd</sup> sentence: <i>... This places the mauri (life-force) of the water at the forefront of decision making, recognising <u>that</u> te hauora o te wai (the health of the water) is the first priority ...</i></p> <p>Paragraph 1, last sentence: <i>... Giving effect to Te Mana o te Wai requires actively involving <del>takata</del> <u>mana</u> whenua in freshwater planning and management.</i></p>
LF-WAI-AER2	Support	The AER is consistent with giving effect to the NPSFM 2020.	Retain as notified
LF-VM Objectives - General	Support with amendment	<p>See paragraphs 3.3 to 3.6 above.</p> <p>In pre-notification engagement on the PORPS, Kā Rūnaka sought a single overarching vision to apply across all FMUs. The first preference of Kā Rūnaka is still to have an overarching vision for key values that applies to all</p>	<p>Restructure the LF-VM and LF-FW objectives to set out an overarching vision for freshwater in Otago incorporating the outcomes below, with specific visions for each FMU where this is needed to set priority outcomes for the FMU or recognise unique characteristics</p> <p>OR</p>

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		<p>FMUs, with more specific visions for each FMU focusing on priority outcomes and/or unique characteristics for that FMU.</p> <p>Kā Rūnaka consider the following components that are currently included in one or more objectives are important to be included in an overarching vision. If there is to be no overarching vision, then these components should be included in all visions:</p> <ul style="list-style-type: none"> <li>• Kāi Tahu relationship with wāhi tūpuna</li> <li>• Kāi Tahu ability to access and use water bodies to maintain their connection with the wai</li> <li>• The health and abundance of mahika kai</li> <li>• The health of ecosystems and indigenous species</li> <li>• The health of wetlands, estuaries and lagoons, and downstream coastal waters</li> <li>• The ability for indigenous species to migrate easily</li> </ul>	<p>Amend the objectives to remove unnecessary inconsistencies and to ensure that the vision for each FMU addresses the outcomes below:</p> <ul style="list-style-type: none"> <li>• Kāi Tahu relationship with wāhi tūpuna</li> <li>• Kāi Tahu ability to access and use water bodies to maintain their connection with the wai</li> <li>• The health and abundance of mahika kai</li> <li>• The health of ecosystems and indigenous species</li> <li>• The health of wetlands, estuaries and lagoons, and downstream coastal waters</li> <li>• The ability for indigenous species to migrate easily</li> <li>• Sustaining the natural form and function of the water bodies</li> <li>• Sustainable land and water management practices</li> <li>• Ceasing direct discharges of wastewater to water bodies.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Sustaining the natural form and function of the water bodies</li> <li>• Sustainable land and water management practices</li> <li>• Ceasing direct discharges of wastewater to water bodies.</li> </ul> <p>Differentiation between FMUs should only be necessary to reflect specific characteristics of an FMU. There is also unnecessary inconsistency in the wording of the various objectives in respect to some components of the vision.</p> <p>Kā Rūnaka also wish to see timeframes for action in visions that require practices to change within 10 years and visions to be achieved within 20 years.</p> <p>Although some specific amendments are proposed in submission points below, Kā Rūnaka recommend a broader review of the objectives (including LF-FW-O8 as well as the LF-VM objectives) to include key components in an overarching vision, or at least to improve consistency of approach. We would welcome the opportunity to work with ORC on this</p>	

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
Objective LF-VM-O2 Clutha Mata-au FMU vision	Support with amendment	<p>See paragraphs 3.3 to 3.6 above.</p> <p>Kā Rūnaka support the vision in general, but seek amendments to reflect the intent to manage the Mata-au as a single system, by ensuring that visions that are appropriate for the whole FMU are applied at that level and only necessary distinctions are made between rohe.</p> <p>Amendments are also proposed to:</p> <ul style="list-style-type: none"> <li>• Make sure that water quality supports safe consumption of mahika kai as well as safe human contact</li> <li>• Improve general clarity of meaning and consistency of wording across visions.</li> </ul> <p>Kā Rūnaka also consider that the visions for all rohe should be required to be achieved within 20 years to ensure that degraded environments are improved by the current generation, rather than being left to the next one.</p>	<p>Amend as follows:</p> <p><i>In the Clutha Mata-au FMU:</i></p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) ...</p> <p>(4) ...</p> <p>(5) ...</p> <p><u>(6) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored,</u></p> <p><u>(7) 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</u></p> <p><u>(8) 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 so that they are safe for human contact and mahika kai species are safe for consumption, and</u></p> <p><u>(9) sustainable abstraction occurs from lakes, river main stems or groundwater in preference to tributaries,</u></p> <p><u>(10) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and mahika kai species are safe for consumption, and</u></p>

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			<p><del>(11)</del> there are no direct discharges of wastewater to water bodies, <u>and</u></p> <p><del>(12)(6)</del> the national significance of the Clutha hydro-electricity generation scheme is recognised,</p> <p><del>(13)(7)</del> in addition to (1) to <del>(12)(6)</del> above:</p> <p>(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,</p> <p><del>(b)</del> in the Dunstan, Manuherekia and Roxburgh rohe:</p> <p><del>(i)</del> 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</p> <p><del>(ii)</del> 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</p> <p><del>(iii)</del> sustainable abstraction occurs from main stems or groundwater in preference to tributaries,</p> <p>(c) in the <u>Upper Lakes and Lower Clutha</u> rohe:</p> <p>(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, <u>and</u></p> <p><del>(ii)</del> the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored,</p>

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			<p><del>(iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</del></p> <p><del>(iv) there are no direct discharges of wastewater to water bodies, and</del></p> <p><del>(14)(8) the outcomes sought in (7) are to be achieved within the following timeframes:</del></p> <p><del>(a) by 2030 in the Upper Lakes rohe, and</del></p> <p><del>(b) by 2045 in the Dunstan, Manuherehia, Roxburgh and Lower Clutha rohe, and.</del></p> <p><del>(c) by 2050 in the Manuherehia rohe.</del></p>
LF-VM-O3 – North Otago FMU vision	Support with amendment	<p>See paragraphs 3.3 to 3.6 above.</p> <p>Kā Rūnaka support the vision in general, but seek amendments to:</p> <ul style="list-style-type: none"> <li>• Make sure that water quality supports safe consumption of mahika kai as well as safe human contact</li> <li>• Incorporate important components of other visions that should be outcomes for all FMUs</li> <li>• Improve general clarity of meaning and consistency of wording across visions.</li> </ul> <p>Kā Rūnaka also consider that the visions for all FMUs should be required</p>	<p>Amend as follows:</p> <p><del>By 2050</del> <u>2045</u> in the North Otago FMU:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) ...</p> <p>(4) ...</p> <p><u>(X) 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.</u></p> <p>(5) <u>land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and mahika kai species are safe for consumption, and</u></p>

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
		<p>to be achieved within 20 years to ensure that degraded environments are improved by the current generation, rather than being left to the next one.</p> <p>Also see submission on MAP1: If the Waikouaiti catchment is retained in the North Otago FMU, Ka Rūnaka consider the vision should recognise management outcomes for Waikouaiti freshwater mātaītai and the East Otago Taiāpure.</p>	<p><u>(Y) there are no direct discharges of wastewater to water bodies, and</u></p> <p><u>(6) food production in the area is supported by innovative and sustainable land and water management practices support food production in the area and that improve resilience to the effects of climate change.</u></p> <p>Also see submission on MAP1: If the Waikouaiti catchment is retained in the North Otago FMU, include recognition of management outcomes for the Waikouaiti freshwater mātaītai and the East Otago Taiāpure in the objective.</p>
LF-VM-O4 – Taieri FMU vision	Support with amendment	<p>See paragraphs 3.3 to 3.6 above.</p> <p>Kā Rūnaka support the vision in general, but seek amendments to:</p> <ul style="list-style-type: none"> <li>• Extend the requirement for healthy populations of galaxiids to apply also to other indigenous species, including tuna which are a highly important mahika kai species in the Taieri.</li> <li>• Make sure that water quality supports safe consumption of mahika kai as well as safe human contact</li> <li>• Incorporate important components of other visions that should be outcomes for all FMUs</li> </ul>	<p>Amend as follows:</p> <p><u>By 2050 2045 in the Taieri Taieri FMU:</u></p> <p>(1) ...</p> <p>(2) ...</p> <p><u>(X) water bodies support thriving mahika kai and Kāi Tahu whānui have access to mahika kai,</u></p> <p><u>(3) healthy wetlands are restored in the upper and lower catchment wetland complexes, including the <del>Waipori/Waihola Wetlands</del> Waihola/Waipōuri wetland complex, Tunaheketaka/Lake Taieri, scroll plain, and tussock areas,</u></p> <p><u>(4) the gravel bed of the lower <del>Taieri Taieri</del> Taieri is restored and sedimentation of the <del>Waipori/Waihola</del> Waihola/Waipōuri wetland complex is reduced,</u></p>



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		<ul style="list-style-type: none"> <li>• Improve general clarity of meaning and consistency of wording across visions.</li> </ul> <p>The correct traditional spelling of this river is Taiari, and Kā Rūnaka request that this spelling be used to recognise that the whole of the catchment is wāhi tūpuna. Use of the traditional name would be an appropriate acknowledgement of the connection of mana whenua with the river. Similarly, Kā Rūnaka request that the traditional spelling of Waipōuri be used instead of Waipori.</p> <p>Kā Rūnaka also consider that the visions for all FMUs should be required to be achieved within 20 years to ensure that degraded environments are improved by the current generation, rather than being left to the next one.</p>	<p><u>(Y) 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, and</u></p> <p>(5) ...</p> <p><u>(6) water bodies support healthy populations of galaxiid species and other indigenous species, including tuna,</u></p> <p><u>(Z) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and mahika kai species are safe for consumption,</u></p> <p>(7) ...</p> <p><u>(8) food production in the area is supported by innovative and sustainable land and water management practices <del>support food production in the area and that</del> improve resilience to the effects of climate change.</u></p>
LF-VM-05 – Dunedin & Coast FMU vision	Support with amendment	<p>See paragraphs 3.3 to 3.6 above.</p> <p>Kā Rūnaka support the vision in general, but seek amendments to:</p> <ul style="list-style-type: none"> <li>• Make sure that water quality supports safe consumption of mahika kai as well as safe human contact</li> </ul>	<p>Amend as follows:</p> <p><i>By 2040 in the Dunedin &amp; Coast FMU:</i></p> <p>(1) ...</p> <p><u>(2) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained and Kāi Tahu maintain their connection with and use of the water bodies,</u></p>

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
		<ul style="list-style-type: none"> <li>• Incorporate important components of other visions that should be outcomes for all FMUs</li> <li>• Improve general clarity of meaning and consistency of wording across visions.</li> </ul> <p>Also see submission on MAP1: If the Waikouaiti catchment is moved into the Dunedin and Coast FMU, Kā Rūnaka consider the vision should recognise management outcomes for Waikouaiti freshwater mātaītai and the East Otago Taiāpure.</p>	<p>(3) ...</p> <p>(4) ...</p> <p><i>(5) discharges of contaminants from urban <u>and rural</u> environments are reduced so that water bodies are safe for human contact <u>and mahika kai species are safe for consumption, and</u></i></p> <p><i>(X) there are no direct discharges of wastewater to water bodies.</i></p> <p>Also see submission on MAP1: If the Waikouaiti catchment is included in the Dunedin and Coast FMU, include recognition of management outcomes for the Waikouaiti freshwater mātaītai and the East Otago Taiāpure in the objective.</p>
LF-VM-O6 – Catlins FMU vision		<p>See paragraphs 3.3 to 3.6 above.</p> <p>Kā Rūnaka support the vision in general, but seek amendments to:</p> <ul style="list-style-type: none"> <li>• Make sure that water quality supports safe consumption of mahika kai as well as safe human contact</li> <li>• Incorporate important components of other visions that should be outcomes for all FMUs</li> <li>• Improve general clarity of meaning and consistency of wording across visions.</li> </ul>	<p>Amend as follows:</p> <p><i>By 2030 in the Catlins FMU:</i></p> <p>(1) ...</p> <p>(2) ...</p> <p><i>(3) water bodies support thriving mahika kai <u>that is safe for consumption, and access of Kāi Tahu whānui to mahika kai,</u></i></p> <p><i>(4) the high degree of naturalness <u>of the water bodies and ecosystem connections between the forests, freshwater and coastal environment are preserved,</u></i></p> <p><i><u>(X) 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,</u></i></p>

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			<p>(5) ...</p> <p><i>(Y) there are no direct discharges of wastewater to water bodies, and</i></p> <p>(6) ...</p>
LF-VM-P5 – Freshwater Management Units (FMUs) and rohe	Support with amendment	<p>Kā Rūnaka generally support the delineation of FMUs and rohe as being practical to assist in focusing management approaches.</p> <p>However, the inclusion of the Waikouaiti catchment and the catchment feeding Mataīnaka (Hawksbury Lagoon) in the North Otago FMU is not supported. Kā Rūnaka consider these catchments would be more appropriately located in the Dunedin and Coast FMU. This would provide for better alignment of management across all catchments that flow into the coastal receiving environment that is included in the East Otago Taiāpure (encompassing marine and estuarine waters enclosed by Cornish Head, Brinns Point, Warrington Spit and Potato Point).</p>	Retain LF-VM-P5 as notified, but see submission point on MAP1
LF-VM-P6 – Relationship between FMUs and rohe	Support with amendment	Kā Rūnaka support clarity being provided in the RPS as to the relationship between environmental outcomes, target attribute states, limits	<p>Amend as follows:</p> <p><i>Where rohe have been defined within FMUs:</i></p> <p>(1) ...</p>

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		<p>and action plans for rohe and for their “parent” FMUs. Kā Rūnaka consider it is important that the place-specific provisions or action plans that are developed for a rohe should prevail over the more general provisions in the broader FMU, to ensure that the outcomes for that rohe are able to be achieved. It is also important that rohe-specific provisions cannot be more lenient than those applying in the broader FMU, as this would not be consistent with integrated management and would put the ability to achieve the outcomes for the FMU at risk.</p> <p>However, an amendment is requested for clarity.</p>	<p>(2) ...</p> <p><i>(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 ...</i></p>
LF–VM–E2 – Explanation	Support	The explanation and principal reasons clearly describe the intent of the provisions.	Retain as notified.
LF–FW–O8 – Fresh water	Support with amendment	<p>See paragraphs 3.3 to 3.4 above.</p> <p>The outcomes sought in the objective are generally appropriate to give effect to Te Mana o te Wai and to provide for the relationship of Kāi Tahu with wai māori.</p>	<p>Amend as follows:</p> <p><i>In Otago’s water bodies and their catchments:</i></p> <p><i>(1) the health of the wai supports the health of the people and thriving mahika kai,</i></p> <p><i>(2) water flow is continuous throughout the whole system,</i></p>

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
		<p>However, amendments are requested to:</p> <ul style="list-style-type: none"> <li>Recognise the interconnections between land and water</li> <li>require that the habitats of taoka species are not only protected, but also sustained. Sustaining habitats, rather than just protecting their basic requirements, will ensure greater resilience.</li> </ul>	<p><i>(3) the interconnection of <u>land</u>, fresh water (including groundwater) and coastal waters is recognised,</i></p> <p><i>(4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected <u>and sustained</u>, ...</i></p>
LF–FW–O9 – Natural wetlands	Support with amendment	<p>See paragraphs 3.3, 3.4 and 3.8 above.</p> <p>The outcomes sought in the objective are generally appropriate to give effect to the NPSFM and to provide for the relationship of Kāi Tahu with wai māori.</p> <p>However, amendments are requested to:</p> <ul style="list-style-type: none"> <li>Recognise the values of wetlands for storing water and increasing the length of time it is retained in the catchment</li> <li>Improve clarity</li> </ul>	<p>Amend as follows:</p> <p><i>Otago’s natural wetlands are protected or restored so that:</i></p> <p><i>(1) mahika kai and other mana whenua values are sustained and enhanced now and for future generations,</i></p> <p><i>(2) there is no decrease in the <del>range</del> <u>extent</u> and diversity of indigenous ecosystem types and habitats in natural wetlands,</i></p> <p><i>(3) there is no reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if <u>these have been degraded</u>, they are improved, and</i></p> <p><i>(4) their flood attenuation <u>and water storage capacity</u> is maintained.</i></p>
LF–FW–P7 – Fresh water	Support with amendment	<p>See paragraphs 3.2 to 3.4 above.</p> <p>The policy is appropriate to give effect to Te Mana o te Wai and to provide for the relationship of Kāi Tahu with wai māori. Kā Rūnaka support imposition of</p>	<p>Amend as follows:</p> <p><i>Environmental outcomes, attribute states (including target attribute states) states), <u>environmental flows and levels</u>, and limits ensure that:</i></p>

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		<p>timeframes that require degradation of water bodies to be reversed before another generation passes so that mātauraka can continue to be passed on.</p> <p>However:</p> <ul style="list-style-type: none"> <li>Reference to environmental flows and levels, as well as limits, would be more consistent with the NPSFM</li> <li>the habitats of indigenous species should be not only protected, but also sustained to ensure greater resilience</li> <li>the wording of clause (6) could be interpreted as placing the emphasis on allocating up to the limits, encouraging maximum use, rather than encouraging allocation to be only as much as needed, within the limits.</li> </ul> <p>Amendments are requested to address these points.</p>	<p>(1) ...</p> <p>(2) <i>the habitats of indigenous species associated with water bodies are protected <u>and sustained</u>, including by providing for fish passage,</i></p> <p>(3) ...</p> <p>(4) ...</p> <p>(5) ...</p> <p>(6) <i>allocation of fresh water is <del>allocated</del> within environmental limits and <u>water is used efficiently</u>.</i></p>
LF-FW-P9 – Protecting natural wetlands	Support with amendment	<p>See paragraphs 3.10, 3.11 and 3.15 above.</p> <p>The policy is an appropriate way to achieve the objectives of this PORPS</p>	<p>Amend as follows:</p> <p><i>Protect natural wetlands by:</i></p> <p>(1) <i>avoiding a reduction in their values or extent unless:</i></p>

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		<p>and to give effect to the NPSFM 2020 Section 3.22.</p> <p>However, an amendment is requested to correct typographic errors.</p>	<p>(a) the loss of values or extent arises from:</p> <p>(i) ...</p> <p>(ii) ...</p> <p>(iii) ...</p> <p>(iv) ...</p> <p>(v) ...</p> <p>(vi) the maintenance of or operation of <del>specific</del> <u>specified</u> infrastructure, or other infrastructure ...</p>
LF-FW-P10 – Restoring natural wetlands	Support	<p>See paragraphs 3.10, 3.11 and 3.15 above.</p> <p>The policy is an appropriate way to achieve the objectives of this PORPS, give effect to the NPSFM 2020 and provide for the relationship of Kāi Tahu with wai māori.</p>	Retain as notified
LF-FW-P15 – Stormwater and wastewater discharges	Support with amendment	<p>See paragraphs 3.2 to 3.4 above.</p> <p>Discharges of wastewater, and human wastes such as cremated ashes, directly to water without first being cleansed by Papatūānuku, are culturally offensive to Kāi Tahu. Kā Rūnaka support the general direction of the policy, but wish to see this strengthened to require that existing wastewater discharges to water are to be phased out, and new discharges</p>	<p>Replace with two policies as follows:</p> <p><b><u>LF-FW-P15 – Discharges containing animal effluent, sewage and other human wastes, and industrial and trade waste</u></b></p> <p><u>Avoid the adverse effects of direct and indirect discharges containing animal effluent, sewage and other human wastes (including cremated ashes), and industrial and trade waste to fresh water by:</u></p> <p>(1) <u>requiring new discharges containing sewage or other human wastes, or industrial and trade waste to be to land, unless</u></p>

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		<p>required to be to land unless the effects of this will be demonstrably greater than if the discharge was to water.</p> <p>Kā Rūnaka note that wastewater is defined in the PORPS as including sewage, greywater and industrial and trade waste, but not animal effluent, and seek amendments to ensure the policy direction also applies to discharges of animal effluent.</p> <p>Kā Rūnaka support the requirement that on-site wastewater systems are in accordance with best practice, but consider this requirement should also apply to stormwater management, to reduce the risk of sediment and other contaminants in stormwater entering water bodies. In urban areas, stormwater management should be integrated through catchment management plans to reduce loading on water bodies.</p> <p>Kā Rūnaka also consider that dividing the policy into separate policies for wastewater and for stormwater would make the direction clearer.</p>	<p><u>adverse effects associated with a discharge to land are demonstrably greater than a discharge to fresh water,</u></p> <p>(2) <u>phasing out existing direct discharges of sewage or industrial and trade wastes, whether treated or untreated, to fresh water, and</u></p> <p>(3) <u>requiring discharges containing animal effluent to be to land,</u></p> <p>(4) <u>requiring:</u></p> <p><u>(a) that all discharges containing sewage or industrial and trade waste are discharged into a reticulated wastewater system, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u></p> <p><u>(b) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring into reticulated wastewater systems,</u></p> <p><u>(c) on-site wastewater systems and animal effluent systems to be designed and operated in accordance with best practice standards,</u></p> <p><u>(d) that any discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe, and</u></p> <p>(5) <u>promoting source control as a method for reducing contaminants in discharges containing industrial and trade waste.</u></p> <p><b><u>LF-FW-P15A – Stormwater discharges</u></b></p>



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			<p><u>Minimise the adverse effects of direct and indirect discharges of stormwater to fresh water by:</u></p> <p><u>(1) requiring:</u></p> <p><u>(a) integrated catchment management plans for management of stormwater in urban areas,</u></p> <p><u>(b) stormwater 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,</u></p> <p><u>(c) consideration of the use of on-site systems to attenuate flow and filter stormwater prior to discharge into any reticulated system,</u></p> <p><u>(d) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring into reticulated stormwater systems,</u></p> <p><u>(e) on-site stormwater management systems to be in accordance with best practice standards,</u></p> <p><u>(f) stormwater to be managed so that any discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe,</u></p> <p><u>(g) the use of water sensitive 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</u></p>

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			<i>(3) <u>promoting source control as a method for reducing contaminants in discharges of stormwater.</u></i>
LF–FW–M6 – Regional plans	Support with amendment	<p>See paragraphs 3.2 to 3.8 above.</p> <p>The method is generally appropriate to achieve the objectives of this PORPS and give effect to the NPSFM 2020 and Te Mana o te Wai.</p> <p>However, Kā Rūnaka consider amendments are needed to:</p> <ul style="list-style-type: none"> <li>• ensure that environmental flow and level regimes, resource use limits and timeframes are linked to achievement of freshwater visions;</li> <li>• recognise the hydrological connections between water bodies and wetlands; and</li> <li>• improve clarity.</li> </ul> <p>In addition, Kā Rūnaka request that, in order to recognise and provide for the relationship of Kāi Tahu with wai māori, a new clause be added to ensure that Kāi Tahu cultural and spiritual concerns about mixing of water between different catchments are considered and addressed in development of the Land and Water Regional Plan.</p>	<p>Amend as follows:</p> <p><i>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:</i></p> <p><i>(1) ...</i></p> <p><i>(2) ...</i></p> <p><i>(3) identify water bodies that are over-allocated in terms of either their water quality or quantity,</i></p> <p><i>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai, <u>support achievement of the vision for the Freshwater Management Unit set out in the LF-VM objectives and provide for:</u></i></p> <p><i>(a) the <u>natural</u> behaviours of the water body including a base flow or level that provides for variability,</i></p> <p><i>(b) ...</i></p> <p><i>(c) ...</i></p> <p><i>(d) the hydrological connection with other water bodies, <u>wetlands, estuaries and coastal margins,</u></i></p> <p><i>(e) ...</i></p> <p><i>(f) ...</i></p>

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			<p><i>(5) include limits on resource use that <u>support achievement of the vision for the Freshwater Management Unit set out in the LF-VM objectives:</u></i></p> <p><i>(a) differentiate between types of uses, including drinking water, and social, cultural and economic uses, in order to provide long-term certainty <del>in relation to</del> <u>about the availability of water for those uses of available water,</u></i></p> <p><i>(b) for water bodies that have been identified as over-allocated, provide methods and timeframes for phasing out that over-allocation <u>within the timeframes required to achieve the vision for the Freshwater Management Unit set out in the LF-VM objectives,</u></i></p> <p><i>(c) ...</i></p> <p><i>(d) ...</i></p> <p><i>(6) ...</i></p> <p><i>(7) ...</i></p> <p><i><u>(X) recognise and respond to Kāi Tahu cultural and spiritual concerns about mixing of water between different catchments, and</u></i></p> <p><i>...</i></p> <p><i>(8) ...</i></p>
LF-FW-M7 – District plans	Support with amendment	<p>See paragraphs 3.3 to 3.4 above.</p> <p>The method is generally appropriate to achieve the objectives of this PORPS and to give effect to the NPSFM 2020. In particular, Kā Rūnaka support clear direction for district plans to include provisions to reduce the adverse</p>	<p>Retain as notified but add the following new clause:</p> <p><i>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</i></p> <p><i>...</i></p>

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		<p>effects of stormwater discharges from subdivision and land development. Ka Rūnaka consider the lack of integration across regional and territorial jurisdictions has contributed to contamination of water bodies and welcomes stronger direction on this.</p> <p>Kā Rūnaka request that a new clause be added to implement Policy LF–FW–P13 (Preserving natural character) as this is a shared responsibility across regional and territorial jurisdictions.</p>	<p><u>(x) include provisions to preserve the natural character of lakes and rivers and their margins from the adverse effects of land use and development and activities on the surface of water, ...</u></p>
LF–FW–M8 – Action plans	Support	The method is appropriate to achieve the objectives of this PORPS and give effect to the NPSFM 2020.	Retain as notified
LF–FW–E3 – Explanation	Support with amendment	<p>In general, the explanation clearly describes the intent of the provisions. However, Kā Rūnaka seek amendments to:</p> <ul style="list-style-type: none"> <li>• Replace reference to “takata whenua” with “mana whenua” consistent with practice across the PORPS</li> <li>• Refer to wetland values that are recognised and provided for in objectives and policies</li> </ul>	<p>Amend as follows:</p> <p>Paragraph 2, 3<sup>rd</sup> sentence:</p> <p><i>... This reflects the views of <del>takata</del> <u>mana</u> whenua and the community that fresh and coastal water, including wetlands, should be managed holistically and in a consistent way ...</i></p> <p>Paragraph 2, final sentence:</p> <p><i>... This is because of the importance of restoration to Kāi Tahu and in recognition of the historic loss of wetlands in Otago, <u>and the indigenous biodiversity values and hydrological values of wetland systems.</u></i></p>

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LF-FW-PR3 – Principal reasons	Support with amendment	In general, the reasons for the provisions are clearly described. However, the reference to providing more specific direction on giving effect to Te Mana o te Wai and achieving freshwater visions is confusing without further explanation. The wording following this reference more clearly describes the focus of the section.  Kā Rūnaka seek amendments to reflect this and also to recognise that both urban and rural land uses contribute to degradation of water bodies.	Amend as follows:  Paragraph 1, final sentence:  <i>The legacy of Otago’s historical mining privileges, coupled with contemporary <u>urban and rural</u> land uses, contribute to ongoing water quality and quantity issues in <del>some</del> water bodies, with significant cultural effects.</i>  Paragraph 3:  <i>This section of the LF chapter <del>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 ...</del></i>
LF-FW-AER4 to LF-FW-AER8, LF-FW-AER10, LF-FW-AER11	Support	The AERs appropriately reflect the outcomes the objectives and policies are seeking to achieve.	Retain as notified
LF-FW-AER9	Support with amendment	Kā Rūnaka request an amendment to reflect the submission on LF-FW-P15.	Amend as follows:  <i><u>The Direct discharges of wastewater to water are phased out and frequency of wastewater overflows is reduced.</u></i>
LF-LS-P18 – Soil erosion	Support	See paragraphs 3.3 to 3.4 above.  The policy is appropriate to achieve the objectives of this PORPS.	Retain as notified
LF-LS-P21 – Land use and fresh water	Support with amendments	See paragraphs 3.3 to 3.4 above.  Kā Rūnaka support integrated management of land to achieve freshwater environmental outcomes	Amend as follows:  <i>Achieve the improvement or maintenance of freshwater quantity, <del>or</del> <u>quality, and ecosystem values</u> to meet environmental outcomes set for Freshwater Management Units and/or rohe by:</i>

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		<p>and support Te Mana o te Wai. However, as part of an integrated approach, Kā Rūnaka consider the policy should also address the achievement of freshwater environmental outcomes relating to ecosystem values (which are required to be set under the NPSFM).</p> <p>Kā Rūnaka also consider that the policy should provide direction on the management of riparian margins. These areas are the interface between land and water and serve important functions relating to the health and well-being of water bodies. LF–LS–M13 includes methods to achieve integrated management of riparian margins, but these are not supported by any policy direction.</p>	<p>(1) ...</p> <p>(2) ..., <u>and</u></p> <p><u>(3) managing riparian margins to maintain or enhance their habitat and biodiversity values, reduce sedimentation of water bodies and support improved functioning of catchment processes.</u></p>
LF–LS–M11 – Regional plans	Support with amendment	<p>See paragraphs 3.3 to 3.4 above.</p> <p>Kā Rūnaka support integrated management of land to achieve freshwater environmental outcomes and support Te Mana o te Wai.</p> <p>However, while using water efficiently is an inherent component of sustainable land management, Kā Rūnaka are concerned that reference to efficiency separately could be</p>	<p>Amend as follows:</p> <p><i>Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and then, when it is made operative, maintain that regional plan to:</i></p> <p><i>(1) manage land uses that may affect the ability of environmental outcomes for water quality to be achieved by requiring:</i></p> <p><i>(a) the development and implementation of certified freshwater farm plans as required by the RMA and any regulations,</i></p>

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		<p>interpreted as encouraging efficiency of use without a broader sustainability focus. Such an approach has previously had adverse effects on the health and wellbeing of water bodies. It is also not correct to refer to allocation in the context of clause (2). Allocation is a management technique, not a result of change in land use.</p> <p>Amendments are also requested to:</p> <ul style="list-style-type: none"> <li>Delete unnecessary reference to legislation</li> </ul> <p>Correct a typographical error.</p>	<p>(b) ...</p> <p>(c) <i>effective management of effluent storage and applications systems, and</i></p> <p>(d) ...</p> <p>(2) <i>provide for changes in land use that improve the sustainable and efficient allocation and use of and reduce demand on fresh water to give effect to objectives developed under the NPSFM, and</i></p> <p>...</p>
LF-LS-AER14		Kā Rūnaka request an amendment to reflect wording in LF-LS-21.	<p>Amend as follows:</p> <p><i>The use of land supports the achievement of environmental outcomes and objectives in set for Otago's FMUs and rohe.</i></p>
<b>Maps</b>			
MAP1	Support with amendment	<p>Kā Rūnaka generally support the delineation of FMUs and rohe as being practical to assist in focusing management approaches.</p> <p>However:</p> <p>(a) The coastal boundaries of the FMUs are inconsistent in the extent to which they include estuarine systems. A ki uta ki tai approach</p>	<ol style="list-style-type: none"> <li>Amend the coastal boundaries to include all estuarine areas and enclosed shallow inlets – including the Tautuku and Kaikorai estuaries, Hoopers Inlet, Papanui Inlet, Purakaunui Inlet and Blueskin Bay.</li> <li>Amend boundaries of North Otago and Dunedin &amp; Coast FMUs so that the Waikouaiti catchment and the catchment feeding Mataīnaka (Hawksbury Lagoon) are included in the Dunedin &amp; Coast FMU.</li> </ol>

Chapter / Provision	Support/oppose/ amend	Reason for support or opposition	Relief sought
		<p>would be better reflected by inclusion of all these areas, so that activities in the catchments can be managed to achieve environmental outcomes at the coastal interface.</p> <p>(b) Inclusion of the Waikouaiti catchment and the catchment feeding Mataīnaka (Hawksbury Lagoon) in the North Otago FMU is not supported. Kā Rūnaka consider these catchments would be more appropriately located in the Dunedin and Coast FMU, to provide better alignment of management across catchments that flow into the coastal receiving environment in the East Otago Taiāpure (the marine and estuarine waters enclosed by Cornish Head, Brinns Point, Warrington Spit and Potato Point).</p>	