

PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021

**Parts considered to be a Freshwater Planning Instrument
under section 80A of the Resource Management Act 1991**

Summary of Decisions Requested

20 January 2023

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How to use the Summary of Decisions Requested (SODR)

This report has been prepared pursuant to Clause 7 of Schedule 1 to the Resource Management Act 1991 (RMA) and sets out a summary of all decisions requested by submitters on the parts of the Proposed Otago Regional Policy Statement 2FPI021 (Proposed RPS 21) that have been notified as a Freshwater Planning Instrument (FPI). Please note this report is not a summary of the submissions in their entirety. This report does not include reasons for a submitter's request or supporting material included with the submission. The original submission should be referred to if you are seeking to understand the issues raised by a submitter, or reasons for a request. You can find copies of all submissions received on the FPI at www.orc.govt.nz/fpisubmissions

Submissions are sorted by Submitter Name, and you can cross reference from the Submitter List. Searching (CTRL+F) by Submitter ID within the SODR can also be more efficient or specific than searching by name.

How to Read the SODR

The table below is an example of how the information in this SODR has been laid out.

Submitter number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
12345	Ms J Smith	12345.001	LF-WAI – Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified

The SODR is set out to mirror the structure of the FPI. Submission points have been grouped by notified provision or section title where appropriate. Submission points that apply to the FPI generally, or are not specific to a provision, are grouped together. Similar general submissions that relate to a part of the FPI are grouped at the start of the appropriate part. Submission points that relate to a specific provision (e.g. a policy or method), or part of a provision are located under the relevant provision and labelled accordingly as shown in the above figure.

How to interpret the 'Position' column

The Position column is used to indicate the submitter's general position on a matter or provision in the FPI. To maintain a level of consistency in the way these statements are expressed the following protocols have been followed when summarising the submitter's position:

- Requests to retain a provision as notified, in its entirety, are indicated by "Support".
- Requests to delete a provision in its entirety, are indicated by "Oppose".
- All other requests are indicated by "Amend".

How to interpret the 'Summary of Decisions Requested' column

The 'Summary of Decision Requested' contains a summary of the relief sought (or outcome) the submitter seeks from the Council. The focus is on identifying changes requested to the FPI. In some cases, it has been necessary for the Council to clarify or provide context to the request. Where a summary includes text added by the Council this is indicated by [square brackets]. Refer to the original submission for all further detail, clarification or reasons provided by the submitter.

How amendments sought by submitters have been indicated in the 'Summary of Decisions Requested' column

Where a submitter requests change to the wording of the FPI (as notified for public submission) and has included the specific wording for the change, this has been included in the summary. Submitters, and where used, ORC interpretation of submitters requests have generally followed the convention:

- Text requested to be deleted by the submitter is shown in ~~strikethrough~~
- Text requested to be inserted by the submitter is shown in underline.

In some cases, submitters have chosen to indicate changes in different ways. In the interests of accurately relaying submitters wishes, these have been retained where they provide sufficient clarity. Where a specific change is not requested, the summary paraphrases the words provided by the submitter.

List of Submitters

Submitter ID	Submitter Name	Primary Address for Service
FPI001	Dunedin City Council	paul.freeland@dcc.govt.nz
FPI002	Canterbury Regional Council (Environment Canterbury)	Paul.thompson@ecan.govt.nz
FPI003	New Zealand Defence Force	Lucy.edwards@nzdf.mil.nz
FPI004	Submission removed	-
FPI005	Manuherikia Catchment Group (Incorporated Society)	susie@mckconsultancy.co.nz
FPI006	Wendy Gunn	thequince@thequince.co.nz
FPI007	John Highton	John.highton@otago.ac.nz
FPI008	Greenpeace Aotearoa + 1259 supporters	crose@greenpeace.org
FPI009	Central Otago Winegrowers Association	Simon.peirce@gallowaycookallan.co.nz
FPI010	Hamilton Runs Limited	Reneegerard.weir@gmail.com
FPI011	Edgar Parcell	edgarparcell@xtra.co.nz
FPI012	Minister for the Environment	freshwater@mfe.govt.nz
FPI013	Transpower New Zealand Ltd	ainsley@amconsulting.co.nz
FPI014	Rayonier Matariki Forests	Andy.fleming@rayonier.com
FPI015	PF Olsen	Sarah.orton@pfolsen.com
FPI016	Meridian Energy Ltd	Andrew.feierabend@meridianenergy.co.nz
FPI017	Ravensdown Ltd	carmen@planzconsultants.co.nz
FPI018	Waka Kotahi	Richard.shaw@nzta.govt.nz
FPI019	Fonterra Co-operative Group Ltd	Ben.williams@chapmantripp.com
FPI020	Silver Fern Farms Ltd	Steve.tuck@mitchelldaysh.co.nz
FPI021	Ballance Agri-Nutrients Ltd	Dominic.adams@ballance.co.nz
FPI022	Manawa Energy Ltd	Nicola.foran@manawaenergy.co.nz
FPI023	Moutere Station Ltd	harrietjopp@mourestation.co.nz
FPI024	DairyNZ Limited	Carina.ross@dairynz.co.nz
FPI025	Beef+Lamb New Zealand Ltd and Deer Industry New Zealand	Lilly.lawson@beefandlambnz.com
FPI026	Federated Farmers of New Zealand	elinscott@fedfarm.org.nz
FPI027	Contact Energy Limited	David.allen@buddlefindlay.com
FPI028	Waterfall Park Developments Ltd	maddie@brownandcompany.co.nz
FPI029	Otago Regional Council	Anita.dawe@orc.govt.nz
FPI030	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively Kāi Tahu ki Otago)	sandra@aukaha.co.nz
FPI031	Oceana Gold Ltd	Nz.legal@oceanagold.com
FPI032	Te Rūnanga o Ngāi Tahu	Jessica.riddell@ngaitahu.iwi.nz
FPI033	Fulton Hogan Ltd	tensor@tonkintaylor.co.nz
FPI034	Z Energy Ltd, BP Oil NZ Ltd, and Mobil NZ Ltd (The Fuel Companies)	markl@4sight.co.nz
FPI035	Wise Response Society Inc	secretary@wiseresponse.org.nz
FPI036	Port Blakely. Calder Stewart, City Forests, Ernslaw One Ltd, and Wenita (Otago forestry companies)	peter.weir@ernslaw.co.nz
FPI037	Otago Fish & Game Council and the Central Island Fish & Game Council (Fish & Game)	nparagreen@fishandgame.org.nz
FPI038	NZSki Ltd	paul@nzski.com

Submitter ID	Submitter Name	Primary Address for Service
FPI039	Real Group Ltd (Realnz)	fblack@realjourneys.co.nz
FPI040	Duncan Kenderdine	kenderdined@gmail.com
FPI041	McArthur Ridge Vineyard, Strath Clyde Water Ltd, McArthur Ridge Investment Group Ltd, and Mount Dunstan Estates Ltd (McArthur Ridge Vineyard Ltd)	fiona@astonconsultants.co.nz
FPI042	Waihopai Rūnaka, Te Rūnanga Ōraka Aparima, and Te Rūnanga o Awarua (Ngāi Tahu ki Murihiku)	Maria.bartlett@tami.maori.nz
FPI043	Otago Water Resources Users Group Inc (OWRUG)	andrea@landpro.co.nz
FPI044	Director-General of Conservation	mbrass@doc.govt.nz
FPI045	Royal Forest and Bird Protection Society of New Zealand (Forest & Bird)	c.mcgaw@forestandbird.org.nz
FPI046	Queenstown Lakes District Council (QLDC)	pdpenquiries@qldc.govt.nz
FPI047	Horticulture New Zealand	Leanne.roberts@hortnz.co.nz

Part A – Submissions on Freshwater Planning Instrument Provisions

General – whole RPS

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI007	John Highton	FPI007.063	GEN - General submission	General submission	Amend	Amend to include a separate section providing recognition of valued introduced species including protection of their habitat and recognition of their need for migration to maintain healthy populations.
FPI039	Realnz	FPI039.026	GEN - General submission	General submission	Support	Retain all provisions in the pRPS as notified except as discussed or affected by the reasons discussed and relief sought in the submission
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.008	GEN - General submission	General submission	Support	We support the objectives of the overarching RPS to achieve healthy, resilient, safeguarded natural systems; recognising the environment as an integrated system; and preserving the environmental integrity form, function, resilience and life supporting capacities of air, water, soil and ecosystems for future generations.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.010	GEN - General submission	General submission	Support	We support the recognition of mana whenua cultural values, Kāi Tahu, kaitiakitanga, the active participation of mana whenua in decision making and implementation of solutions, mātauraka Māori, connections to wāhi tūpuna, water and water bodies.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.011	GEN - General submission	General submission	Support	We support the protection of intrinsic values through a long term strategic approach (which) recognises and provides for ecosystem complexity and connection and anticipates and responds swiftly to changes, pressures and trends. However, the RPS and subsequent rules will need to include triggers and benchmarks to respond 'swiftly to changes, pressures and trends'.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.015	GEN - General submission	General submission	Support	We support the consideration of cumulative effects, including the cumulative effects of intensive dairy farming, water extraction, greenhouse gas emissions, biodiversity loss, sedimentation and nitrates/nitrogen to air, water and soil, within and across catchments.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.028	GEN - General submission	General submission	Support	Te Rūnanga supports the submissions and detailed relief sought by Te Rūnanga o Moeraki; Kāti Huirapa ki Puketeraki; Te Rūnanga o Ōtākou; Waihōpai Rūnaka; Te Rūnanga o Awarua; Te Rūnanga o Ōraka Aparima; Hokonui Rūnaka, and sent in as submissions from Aukaha and Te Ao Marama Inc.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.029	GEN - General submission	General submission	Support	The relationship of Ngāi Tahu to wai māori (freshwater) is one based on whakapapa and is integral to Ngāi Tahu culture and identity. Te Rūnanga supports the strong focus on Te Mana o te Wai and on sustaining the relationship of Ngāi Tahu with wai māori.
FPI001	Dunedin City Council	FPI001.042	GEN - General submission	General submission	Support	The Dunedin City Council supports the ORC in its consideration of the Treaty of Waitangi and its commitment to working with Mana Whenua in its use of Te Mana o te Wai as a national framework.
FPI030	Kāi Tahu ki Otago	FPI030.046	GEN - General submission	General submission	Support	Kā Rūnaka strongly support the recognition of the mana and rakatirataka of Kāi Tahu, and their status as partners under Te Tiriti o Waitangi.

FPI030	Kāi Tahu ki Otago	FPI030.047	GEN - General submission	General submission	Support	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).
FPI030	Kāi Tahu ki Otago	FPI030.048	GEN - General submission	General submission	Support	Kā Rūnaka strongly support the focus on integrated management in the PORPS.
FPI030	Kāi Tahu ki Otago	FPI030.052	GEN - General submission	General submission	Support	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 of the submission, Kāi Tahu seek that provisions are retained.
FPI012	Minister For the Environment	FPI012.001	GEN - General submission	General submission	Support	Overall, the pRPS is a positive step forward and provides a much stronger direction for freshwater management than the existing RPS and subsequent plans.
FPI017	Ravensdown Ltd	FPI017.001	GEN - General submission	General submission	Support	Ravensdown generally supports the PORPS-FW 2021, subject to the amendments requested to address the concerns raised within its submission
FPI044	Director General Of Conservation	FPI044.001	GEN - General submission	General submission	Support	For the avoidance of doubt, provisions which are not specifically addressed in the submission are supported for the reasons given in the s32 Report. Retain as notified, except where specific charges are requested below.
FPI042	Ngāi Tahu ki Murihiku	FPI042.145	GEN - General submission	General submission	Support	Support the intent and overall approach of the Freshwater Planning Instrument parts of proposed Otago Regional Policy Statement, subject to requested decisions.
FPI047	Horticulture New Zealand	FPI047.05	GEN - General submission	General submission	Support	HortNZ supports Kāi Tahu's position that each waterway, has its own mauri, and as such, approaches to each waterway should be approached individually when assessing freshwater outcomes and limits.
FPI047	Horticulture New Zealand	FPI047.07	GEN - General submission	General submission	Support	The Regional Policy Statement in particular freshwater policy, should recognise that essential human health needs such as vegetables and fruit for domestic supply should be recognised within the second priority obligation of the Te Mana o te Wai hierarchy.
FPI037	Fish & Game	FPI037.027	GEN - General submission	General submission	Oppose	Delete and redraft the following sections: Explanation, principle reasons, and anticipated environmental results.
FPI037	Fish & Game	FPI037.055	GEN - General submission	General submission	Oppose	In the alternative, Fish and Game seek deletion of the PORPS 2021.
FPI023	Moutere Station Ltd	FPI023.011	GEN - General submission	General submission	Oppose	Moutere Station opposes the Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement 2021 (pORPS)
FPI010	Hamilton Runs Limited	FPI010.001	GEN - General submission	General submission	Oppose	We are genuinely concerned about the potential implications of increases to minimum flow for the viability of farmers in Otago...The potential for our farmers in the Maniototo

						(who have already heavily invested) in drought protection storage from the Loganburn Reservoir being asked to uphold and support artificially high minimum flow rates is a scary thought and one we do not and will not support!
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.030	GEN - General submission	General submission	Not stated	In general, Te Rūnanga considers that the freshwater provisions appropriately recognise and reflect the relationship of mana whenua to freshwater and provide clear direction on what is required to give effect to the National Policy Statement for Freshwater Management 2020 (NPSFM 2020).
FPI019	Fonterra Co-operative Group Ltd	FPI019.011	GEN - General submission	General submission	Not stated	Fonterra seeks such further or other consequential or alternative relief, in addition to its specific amendments, as may be necessary to fully give effect to the relief sought in its submission.
FPI033	Fulton Hogan Ltd	FPI033.006	GEN - General submission	General submission	Not stated	Fulton Hogan wishes to ensure the regulatory regime under the FPI PORPS does not curtail its existing lawfully established activities.
FPI033	Fulton Hogan Ltd	FPI033.007	GEN - General submission	General submission	Not stated	Fulton Hogan also wishes to ensure that the policy framework does not unnecessarily constrain future activities or have unintended consequences through not adequately recognising the breadth of activities associated with quarrying activities.
FPI033	Fulton Hogan Ltd	FPI033.008	GEN - General submission	General submission	Not stated	Fulton Hogan also seeks any consequential relief to that sought in this submission.
FPI033	Fulton Hogan Ltd	FPI033.009	GEN - General submission	General submission	Not stated	Fulton Hogan is concerned that the FPI PORPS fails to recognise the locational constraints of quarrying by not providing a consenting pathway for quarrying activities within natural wetlands, as is provided within the Exposure Draft NESF and Exposure Draft NPSFM
FPI033	Fulton Hogan Ltd	FPI033.010	GEN - General submission	General submission	Not stated	Fulton Hogan is concerned that the FPI PORPS fails to provide an appropriate level of guidance through objectives and policies relating to freshwater management. The PORPS does little to give region specific context to the NPSFM and fails to address some potential conflict that exists between competing water uses.
FPI001	Dunedin City Council	FPI001.044	GEN - General submission	General submission	Not stated	The DCC has concerns with the use of the policy wording “avoid, remedy or mitigating other adverse effects”.
FPI020	Silver Fern Farms Ltd	FPI020.030	GEN – General submission	General submission	Amend	All necessary and consequential amendments, including any amendments to the PORPS provisions themselves or to other provisions linked to those provisions submitted on, and including any cross-references in other chapters
FPI027	Contact Energy Limited	FPI027.038	GEN – General submission	General submission	Amend	Contact also requests that Lakes Hāwea and Wānaka are macronised; and references to Lake Dunstan are replaced with "Te Wairere / Lake Dunstan" throughout the pORPS.
FPI035	Wise Response Society	FPI035.029	GEN - General submission	General submission	Amend	To the extent that national instruments permit in developing policy, give priority to requiring us humans to better manage ourselves, rather than better management the environment.
FPI035	Wise Response Society	FPI035.030	GEN - General submission	General submission	Amend	To the extent that national instruments permit, throughout the pRPS use the national net zero-carbon target as the consistent “touchstone” for gauging what policies are necessary, realistic, a priority and sustainable in the medium and longer term

FPI035	Wise Response Society	FPI035.031	GEN - General submission	General submission	Amend	To the extent that national instruments permit, identify and adopt a common set of ecologically-sound natural resource and environmental standards across the region consistent with the RPS vision that needs to be met by any FMU visions. More localized standards would always be stronger and never weaker than these. For example, stronger standards for significant or outstanding areas or elements. Require FWU and Rohe visions to be consistent with these standards, over-arching vision for integrated management Te Mana o Te Wai and Te Oranga o te Taiao
FPI035	Wise Response Society	FPI035.032	GEN - General submission	General submission	Amend	To the extent that national instruments permit, in order to meet Te Mana o Te Wai, improve (i.e., potentially better than national policy) all water bodies rather than just the significant and focus on rebuilding biophysical capacity and ecosystem function rather than “outstanding” water bodies and the “values” that we decide are important
FPI035	Wise Response Society	FPI035.033	GEN - General submission	General submission	Amend	To the extent that national instruments permit, use biomimicry as a way of identifying what are likely to be the most efficient and sustainable ways to manage and use resources as natural ecosystems which are in the steady state under renewable energy with no waste, being the hall marks of a sustainable system.
FPI036	Otago forestry companies	FPI036.001	GEN - General submission	General submission	Amend	To the extent that national instruments permit, Include policy direction at an appropriate place in the Freshwater Planning Instrument to stipulate that while a precautionary approach may be appropriate, section 32 of the RMA requires some certainty that any policy intervention would have a projected benefit and would achieve environmental outcomes
FPI037	Fish & Game	FPI037.024	GEN - General submission	General submission	Amend	Make text within Parts 1 and 2 succinct to aid in readability.
FPI037	Fish & Game	FPI037.025	GEN - General submission	General submission	Amend	Format the provision codes so they can be navigated to via search functions on common internet browsers and pdf viewers.
FPI037	Fish & Game	FPI037.048	GEN - General submission	General submission	Amend	<p>Fish & Game submits that the PORPS 2021 will be improved if it adopts concepts of TMOTW for the whole environment. Specifically, by:</p> <ul style="list-style-type: none"> a. creating a clear and directive hierarchy, with the natural environment as the priority; b. imbuing the anthropogenic concepts of health, well-being and resilience* upon the natural environment; and c. ensuring all actions support the health, well-being and resilience of the natural environment. <p>(* Fish & 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)</p>
FPI037	Fish & Game	FPI037.049	GEN - General submission	General submission	Amend	<p>Fish & Game to seek relief for the PORPS 2021 that achieves two key points:</p> <ul style="list-style-type: none"> 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
FPI037	Fish & Game	FPI037.050	GEN - General submission	General submission	Amend	Remove references to 'environmental bottom lines', 'bottom lines' and 'environmental constraints' and instead use the term 'environmental limits' consistently
FPI037	Fish & Game	FPI037.051	GEN - General submission	General submission	Amend	Provide protection for the wide range of Otago ecosystems and habitats by removing the words 'indigenous' and 'native' where it is not logical
FPI037	Fish & Game	FPI037.052	GEN - General submission	General submission	Amend	Develop 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
FPI037	Fish & Game	FPI037.065	GEN - General submission	General submission	Amend	Require the RPS to take a hierarchical approach, with a priority on the natural environment
FPI037	Fish & Game	FPI037.066	GEN - General submission	General submission	Amend	Remove ambiguous and unclear wording and replace with consistent, directive terms
FPI037	Fish & Game	FPI037.067	GEN - General submission	General submission	Amend	Give effect to higher order documents, including by reconciling competing tensions
FPI037	Fish & Game	FPI037.068	GEN - General submission	General submission	Amend	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
FPI037	Fish & Game	FPI037.053	GEN - General submission	General submission	Amend	Explicitly acknowledge that water bodies that support recreation and amenity values are highly valued features
FPI037	Fish & Game	FPI037.054	GEN - General submission	General submission	Amend	In the alternative, Fish and Game seek additional and consequential changes that give effect to the general relief and outcome sought in the submission, or that otherwise address the issues highlighted in the reasons for the submission
FPI038	NZSki Ltd	FPI038.001	GEN - General submission	General submission	Amend	Insert new provisions which explicitly promote the benefits of and provide for people's well-being, including the use of and access to the natural environment for transport, the visitor industry inclusive of commercial recreation, and ancillary commercial and industry services.
FPI038	NZSki Ltd	FPI038.002	GEN - General submission	General submission	Amend	Replace the following words with other words which have a practical or clearer/explicit meaning: <ul style="list-style-type: none"> - Significant - Sustainable/sustainable development/sustained - Environmental limit - Bottom line - Environments

						- Statements including or like “important features and values identified by this RPS”
FPI038	NZSki Ltd	FPI038.003	GEN - General submission	General submission	Amend	Delete term “possible” from the pRPS. Replace with clearer achievable or more practicable direction, or alternatively replace with “practicable”.
FPI038	NZSki Ltd	FPI038.024	GEN - General submission	General submission	Amend	NZSki seeks the following decisions: a. Amendments to all the provisions of the RPS in accordance with and in no way limited to the changes set out on the following pages; b. Or alternatively other amendments, including any such combination of provisions as may be appropriate, to address the matters raised in this submission, and to achieve the intent of this submission. c. Any similar, alternative, consequential and/or other relief as necessary to address the issues raised in this submission. d. Consideration of the matters raised by or on behalf of NZSki in relation to the RPS non-freshwater provisions process (including submissions and evidence). This request is made for the avoidance of doubt in case this submission does not capture all relevant matters raised previously in relation to the non-freshwater provisions process).
FPI038	NZSki Ltd	FPI038.025	GEN - General submission	General submission	Amend	Retain all provisions in the pRPS as notified except as discussed or affected by the reasons discussed and relief sought in the submission.
FPI039	Realnz	FPI039.004	GEN - General submission	General submission	Amend	Replace the following words with other words which have a practical or clearer/explicit meaning: - Significant - Sustainable/sustainable development/sustained - Environmental limit - Bottom line - Environments - Statements including or like “important features and values identified by this RPS”
FPI039	Realnz	FPI039.005	GEN - General submission	General submission	Amend	Delete term “possible” from the pRPS. Replace with clearer achievable or more practicable direction, or alternatively replace with “practicable”.
FPI039	Realnz	FPI039.027	GEN - General submission	General submission	Amend	In addition, Realnz seeks the following decisions: a. Amendments to all the provisions of the RPS in accordance with and in no way limited to the changes set out on the following pages; b. Or alternatively other amendments, including any such combination of provisions as may be appropriate, to address the matters raised in this submission, and to achieve the intent of this submission. c. Any similar, alternative, consequential and/or other relief as necessary to address the issues raised in this submission. d. Consideration of the matters raised by or on behalf of Wayfare (Realnz’s predecessor) in relation to the RPS non-freshwater provisions process (including submissions and evidence). This request is made for the avoidance of doubt in case this submission does not capture all relevant matters raised previously in relation to the non-freshwater provisions process).

FPI043	OWRUG	FPI043.061	GEN - General submission	General submission	Amend	Consequential amendments to give effect to relief sought or alternative amendments to the provisions of pRPS 2021 to address the substance of the concerns raised in this submission
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.001	GEN - General submission	General submission	Amend	Greenpeace Aotearoa Submits that ORC should: Put Te Mana o te Wai first, so that all other objectives in the Regional Policy Statement are informed by the priority to care for water and keep it healthy
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.002	GEN - General submission	General submission	Amend	Greenpeace Aotearoa Submits that ORC should: Commit to phasing out synthetic nitrogen fertiliser by 2024 and lowering cow stocking rates - as the use of synthetic nitrogen fertiliser, and intensive dairy farming are incompatible with protecting Te Mana o te Wai
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.003	GEN - General submission	General submission	Amend	Greenpeace Aotearoa Submits that ORC should: Tackle the climate crisis by lowering cow stocking rates and phasing out synthetic nitrogen fertiliser.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.004	GEN - General submission	General submission	Amend	Greenpeace Aotearoa Submits that ORC should: Consider cumulative effects of pollution such as intensive dairying and too much synthetic nitrogen fertiliser, rather than simply in each individual catchment. What happens upstream affects people, plants and animals downstream.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.005	GEN - General submission	General submission	Amend	Greenpeace Aotearoa Submits that ORC should: Act according to the National Policy Statement, which identifies limits based on environmental impacts. In order to do this, councils must phase out synthetic nitrogen fertiliser.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.006	GEN - General submission	General submission	Amend	Greenpeace Aotearoa Submits that ORC should: Apply the precautionary principle to freshwater management. Intensive dairying and synthetic nitrogen fertiliser have long-term effects on water, climate and human health. With emerging research showing links between nitrate contamination from intensive dairying in drinking water and health effects including, but not limited to bowel cancer, the Council must act now to protect the health of our communities.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.007	GEN - General submission	General submission	Amend	Greenpeace Aotearoa Submits that ORC should: Invest in regenerative organic farming that works with nature, not against it, to help mitigate the climate crisis and prevent water degradation.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.018	GEN - General submission	General submission	Amend	We support the preservation of opportunities for future generations... this RPS must acknowledge, and seek to limit, reduce and phase out the resource inputs and uses that drive this overstretch (specifically synthetic nitrogen fertiliser and intensive dairy farming).
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.019	GEN - General submission	General submission	Amend	We support the adoption of the precautionary approach. That's why the RPS needs to go hard, and phase out synthetic nitrogen fertiliser, improve river flows, to reclaim wild river margins from farming and support regenerative agriculture.

FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.020	GEN - General submission	General submission	Amend	We suggest the plan needs to correctly and fully reflect the priorities of Te Mana o te Wai - <i>to ensure the health and wellbeing of freshwater is protected, and human health needs are provided for, before enabling other uses of water.</i>
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.022	GEN - General submission	General submission	Amend	Communities should be made aware of potential freshwater impacts from their activities and there should be observable changes in community behaviour toward more sustainable lifestyles. Rules and other tools will be essential to encourage and incentivise this anticipated environmental result. At the moment, policy settings and economic instruments incentivise the destruction and extraction of freshwater resources, biodiversity and elements of the planetary commons. These same policy settings encourage short term, self-interested actions as we have seen in the rush to dairy intensification, and it's important that this RPS and subsequent policy documents affect and direct these settings to drive action that meets the objectives of Te Mana o te Wai.
FPI026	Federated Farmers of New Zealand	FPI026.039	GEN - General submission	General submission	Amend	Throughout the 2020 COVID-19 pandemic response, the primary sector's contribution to the region, and wider New Zealand, remained steady, reliable, and important. Through the RPS, Council should encourage and enable that contribution, and in particular recognise and value the positive contribution that the primary sector makes to the region, whether it is through the economy (that is , the important role the primary sector and the associated industry contribute to the GDP), the environment (through the work that rural communities and catchment groups do across the region to improve water quality, quantity, and ecosystem health) and the social (through the rural communities networks and social structure that contribute to the overall wellbeing and social cohesion that allow the communities to thrive)
FPI026	Federated Farmers of New Zealand	FPI026.040	GEN - General submission	General submission	Amend	The RPS needs to provide a robust, clear framework to provide guidance and clarity for the region on freshwater. That guidance needs to recognise and value all aspects of the region that contribute to its core.
FPI026	Federated Farmers of New Zealand	FPI026.041	GEN - General submission	General submission	Amend	The RPS needs to ensure that its directions for change consider reasonable timeframes.
FPI026	Federated Farmers of New Zealand	FPI026.042	GEN - General submission	General submission	Amend	It is important that the final RPS provide a clear framework and guidelines that appropriately recognise the range of sectors, industries and businesses that keep our region's communities and economy vibrant and sustainable.
FPI006	Wendy Gunn	FPI006.004	GEN - General submission	General submission	Amend	I wish for you to put an immense amount of emphasis on groundwater protection.
FPI010	Hamilton Runs Limited	FPI010.002	GEN - General submission	General submission	Amend	Use guidance rather than hard rules to enable farmers to prioritise what will be the most beneficial for the health of the waterways on their property whilst still being viable to operate. Consideration must be given to the whole prosperity of Otago when making any decisions.
FPI001	Dunedin City Council	FPI001.001	GEN - General submission	General submission	Amend	In addition to the specific requests, any such necessary, consequential or further relief required to address the concerns identified in the following table, and to: <ul style="list-style-type: none"> - enable the effective and efficient establishment, operation, use and maintenance of wastewater, stormwater and water supply systems and infrastructure; - enable the use and development of land in accordance with the NPS-UD; - enable a coordinated and collaborative approach between the ORC and territorial authorities on climate change adaption;

						- ensure that the general comments above are implemented throughout the RPS; and better achieve the purpose of the Resource Management Act 1991 (RMA).
FPI001	Dunedin City Council	FPI001.002	GEN - General submission	General submission	Amend	Amend RPS as required to ensure district plan change requirement dates are realistic and achievable based on current work programme priorities, most of which are tied to implementing national direction, and staff resources available (noting current market constraints in recruiting planning staff). Add content to allow these dates to be changed by mutual agreement in consideration of other priorities. Where possible align dates with the date required to produce a new plan under any replacement legislation being brought forward through the RM System reform.
FPI001	Dunedin City Council	FPI001.040	GEN - General submission	General submission	Amend	Some more work is required to achieve the appropriate balance necessary to promote 'sustainable management', and the wellbeing of people and communities, and the environmental bottom lines. This policy evaluation must include consideration of the costs of improved environmental outcomes and the ability of communities to pay (appropriately weighing the costs and benefits of regulation) as required by Section 32 of the Act.
FPI001	Dunedin City Council	FPI001.041	GEN - General submission	General submission	Amend	Across all content, consider whether any changes to methods are required to reflect proposed changes to the RM system, for example the need to delay timeframes or change references to planning documents (e.g. adding new references to Strategic Spatial Plans) recognising that this RPS is likely to be part of transitional provisions that would under the new system be part of a regional-scale plan.
FPI001	Dunedin City Council	FPI001.043	GEN - General submission	General submission	Amend	The DCC considers that the ORC should exercise caution when using the terms <i>avoid</i> and <i>enable</i> terms in light of the Supreme Court's decision in the King Salmon case. It is better practice to include the weighting or balancing within the policy such as has been done in CE-P12 with the use of 'avoid ... unless' language.
FPI001	Dunedin City Council	FPI001.043	GEN - General submission	General submission	Amend	DCC suggests that 'avoid or minimise' should generally be 'avoid or minimise as far as practicable' or similar
FPI001	Dunedin City Council	FPI001.045	GEN - General submission	General submission	Amend	Objectives should read as 'end-states' and should not include policy content (how the end state is to be achieved, or explanations e.g. why it is necessary).
FPI001	Dunedin City Council	FPI001.046	GEN - General submission	General submission	Amend	Policies should be a 'course of action' and describe how the objectives should be achieved.
FPI001	Dunedin City Council	FPI001.047	GEN - General submission	General submission	Amend	The DCC and other asset managers need certainty that infrastructure can be used to discharge stormwater and wastewater, as well as being able to install the pipes, pumping stations, tanks etc.
FPI001	Dunedin City Council	FPI001.048	GEN - General submission	General submission	Amend	In principle, DCC requests that ORC do not amend content that has been agreed through the previous lengthy RPS mediation-appeal process unless there is a compelling reason to do so.
FPI001	Dunedin City Council	FPI001.049	GEN - General submission	General submission	Amend	Content should be confined to matters that have a clear link to matters of regional significance where their inclusion in the RPS is necessary to set a higher order policy direction.

FPI001	Dunedin City Council	FPI001.050	GEN - General submission	General submission	Amend	Where nationally significant issues are relevant to Otago, they would benefit from being framed in terms of specific impacts in/on Otago.
FPI001	Dunedin City Council	FPI001.051	GEN - General submission	General submission	Amend	In several places it is unclear whether the RPS refers to climate change adaptation (preparing for the effects of climate change) and/or climate mitigation (reducing net greenhouse gas emissions). It will be important to undertake both mitigation and adaptation, and therefore refer specifically to both throughout the RPS.
FPI001	Dunedin City Council	FPI001.052	GEN - General submission	General submission	Amend	DCC considers that agreements around roles and responsibilities should be negotiated through the triennial agreement and not imposed via the RPS.
FPI001	Dunedin City Council	FPI001.053	GEN - General submission	General submission	Amend	Cross-referencing to the other related content rather than rephrasing of the subject matter of that content should be used throughout the RPS.
FPI001	Dunedin City Council	FPI001.054	GEN - General submission	General submission	Amend	It would be useful if sections and subsections could be numbered to make navigation of this large document easier.
FPI001	Dunedin City Council	FPI001.055	GEN - General submission	General submission	Amend	DCC considers that it would be useful and efficient to provide the opportunity for pre-hearing mediation and expert caucusing and asks that the Panel consider this request.
FPI001	Dunedin City Council	FPI001.056	GEN - General submission	General submission	Amend	Consider providing explanatory notes when using technical terminology.
FPI001	Dunedin City Council	FPI001.057	GEN - General submission	General submission	Amend	The use of Māori language is supported in the RPS. Explanatory notes may be used when necessary to help in the understanding of te Reo Māori
FPI001	Dunedin City Council	FPI001.057	GEN - General submission	General submission	Amend	The DCC would like the RPS to give greater consideration to how these potential adverse effects [associated with the growth of Dunedin and other parts of Otago] may be otherwise mitigated or remedied.
FPI027	Contact Energy Limited	FPI027.001	GEN - General submission	General submission	Amend	Contact seeks provisions in the Freshwater pORPS that appropriately recognise the national direction of NPS-FM as well as national direction for renewable electricity generation more generally as provided for under the NPSREG.
FPI027	Contact Energy Limited	FPI027.002	GEN - General submission	General submission	Amend	Contact seeks such other further or consequential amendments as may be necessary to respond to Contact's submission.
FPI024	DairyNZ Limited	FPI024.038	GEN - General submission	General submission	Amend	DairyNZ seeks the further strengthening of the s.32 report and evaluation of options and their social, and economic cost.
FPI024	DairyNZ Limited	FPI024.039	GEN - General submission	General submission	Amend	DairyNZ seeks that the extent to which evidence and facts have underpinned the identifications of significant resource management issues in the region is clarified.
FPI024	DairyNZ Limited	FPI024.040	GEN - General submission	General submission	Amend	DairyNZ seeks the strengthening of the assessment of the long-term visions and whether the timeframes are both "ambitious and reasonable".
FPI024	DairyNZ Limited	FPI024.041	GEN - General submission	General submission	Amend	DairyNZ seeks the additions of a transition framework (an objective and policy) recognising the importance of primary production to the Otago region and the support that will be put in place to transition farming practices into a planning framework that gives effect to Te Mana o te Wai.
FPI030	Kāi Tahu ki Otago	FPI030.049	GEN - General submission	General submission	Amend	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

						<p>values of Kāi Tahu. Amendments have been requested in relation to the following aspects of Māori language usage:</p> <p>(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;</p> <p>(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.</p>
FPI030	Kāi Tahu ki Otago	FPI030.050	GEN - General submission	General submission	Amend	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.
FPI030	Kāi Tahu ki Otago	FPI030.051	GEN - General submission	General submission	Amend	Kā Rūnaka consider the timeframes for action should require practises to change within 10 years and visions to be achieved within 20 years.
FPI017	Ravensdown Ltd	FPI017.002	GEN - General submission	General submission	Amend	Ravensdown also requests any consequential amendments arising from the specific submission points
FPI040	Duncan Kenderdine	FPI040.001	GEN - General submission	General submission	Amend	Mr Kenderdine seeks that the RPS be amended to include clear and directive objectives, policies, and methods to as relevant or required to clarify and direct that water allocated under a resource consent (historically and into the future) cannot be transferred or used for a different use.
FPI040	Duncan Kenderdine	FPI040.002	GEN - General submission	General submission	Amend	Mr Kenderdine seeks that the RPS be amended to include clear and directive objectives, policies, and methods as relevant ore required to clarify or direct that the baseline state for consideration of water quality and water quantity is that of a natural state, i.e. the state the water would be without human intervention.
FPI040	Duncan Kenderdine	FPI040.003	GEN - General submission	General submission	Amend	Mr Kenderdine seeks that the RPS be amended to include clear and directive objectives, policies, and methods as relevant or required to clarify or direct that water quality and quantity is managed under the RPS to uphold the priorities of <i>te mana o te wai</i> (set out in the NPSFM 2020) and apply an integrated management approach consistent with the concept of <i>ki uta ki tai</i>
FPI040	Duncan Kenderdine	FPI040.004	GEN - General submission	General submission	Amend	Mr Kenderdine seeks that the RPS be amended to include clear and directive objectives, policies, and methods as relevant or required to clarify that many of Otago's freshwater bodies are actually or effectively degraded (in respect of water quality) and are actually or effectively overallocated (in respect of water quantity), and consequently waterbodies need to be restored and further contamination prevented
FPI040	Duncan Kenderdine	FPI040.005	GEN - General submission	General submission	Amend	Amendments to all the provisions of the RPS in accordance with and in no way limited to the changes set out on the following pages; Or alternatively other amendments, including any such combination of provisions as may be appropriate, to address the

						matters raised in this submission, and to achieve the intent of this submission. Any similar, alternative, consequential and/or other relief as necessary to address the issues raised in this submission
FPI044	Director General of Conservation	FPI044.002	GEN - General submission	General submission	Amend	Further, alternative or consequential relief to like effect to that sought is made.
FPI042	Ngāi Tahu ki Murihiku	FPI042.132	GEN – General submission	General submission	Amend	In all instances where Wānaka is mentioned in the document should be so amended to include a macron.
FPI042	Ngāi Tahu ki Murihiku	FPI042.133	GEN - General submission	General submission	Amend	Amend each instance of “harbor” to “harbour” in all instances where this is mentioned in the document.
FPI042	Ngāi Tahu ki Murihiku	FPI042.138	GEN - General submission	General submission	Amend	The word ‘kōura’ should have a macron over the ‘ō’ in all instances where this word occurs, including in SRMR-17.
FPI042	Ngāi Tahu ki Murihiku	FPI042.145	GEN - General submission	General submission	Amend	Support the decisions requested in the submissions of Kāi Tahu ki Otago and Te Rūnanga o Ngāi Tahu
FPI047	Horticulture New Zealand	FPI047.001	GEN - General submission	General submission	Amend	The Regional Policy Statement and in particular freshwater policy should seek to prioritise the health of people by supporting the resilience of the domestic food system.
FPI047	Horticulture New Zealand	FPI047.016	GEN - General submission	General submission	Amend	The Regional Policy Statement in particular freshwater policy, should seek to support transition to low emissions food production.
FPI047	Horticulture New Zealand	FPI047.002	GEN - General submission	General submission	Amend	The Regional Policy Statement and particular freshwater policy should take an integrated approach to climate adaption and natural hazard risk management, to optimise benefits to urban and rural communities and wider economic, social and cultural well beings.
FPI047	Horticulture New Zealand	FPI047.003	GEN - General submission	General submission	Amend	The Regional Policy Statement should take an integrated approach to freshwater management that recognises the value of highly productive land and prioritises and supports the use of highly productive land for primary production.
FPI047	Horticulture New Zealand	FPI047.004	GEN - General submission	General submission	Amend	The Regional Policy Statement in particular freshwater policy, should recognise food production, food supply and food security as issues that are promoted and considered alongside other uses for essential human health, when making trade-offs that will inevitably be required to meet natural environmental limits.
FPI047	Horticulture New Zealand	FPI047.006	GEN - General submission	General submission	Amend	HortNZ seeks that the Proposed Otago Regional Policy Statement acknowledge the national importance of the summer fruit sector in Otago in supporting national food security and the health of the nation, by including a new issue statement for Food Production, Food Supply and Food Security
FPI041	McArthur Ridge Vineyard Ltd	FPI041.014	GEN - General submission	General submission	Amend	There should be greater policy direction in the PORPS in regard to promoting and providing for land and water uses that are efficient, have minimal impact on the environment, and that provide

						significant economic and social benefits. Viticulture is one example, and other uses could also fall into this category (for example, orchards).
FPI041	McArthur Ridge Vineyard Ltd	FPI041.015	GEN - General submission	General submission	Amend	The objectives and policies of the PORPS provide no direction on how the competing needs of these water users should be prioritised, particularly in over allocated catchments. This submission seeks that the PORPS is amended to provide an increased policy direction in relation to the above matters [in the submission]. Some specific amendments to existing provisions are included in the table attached to the submission, but additional objectives and policies will also be required to fully reflect the above issues.
FPI041	McArthur Ridge Vineyard Ltd	FPI041.016	GEN - General submission	General submission	Amend	Delete the term “Agriculture” and replace with “primary production” throughout the whole RPS.
FPI034	The Fuel Companies	FPI034.007	GEN - General submission	General submission	Amend	In addition to the specific outcomes and relief sought, the following general relief is sought: a) Achieve the following: i. The purpose and principles of the Resource Management Act 1991 (RMA) and consistency with the relevant provisions in Sections 6 - 8 RMA; ii. Give effect to National Policy Statements, Environmental Standards and Regulations, including the National Policy Statement for Freshwater Management (NPSFM) and the New Zealand Coastal Policy Statement (NZCPS); iii. Assist the Council to carry out its functions under Section 30 RMA; iv. Meet the requirements of the statutory tests in section 32 of the RMA; and v. Avoid, remedy or mitigate any relevant and identified environmental effects;
FPI034	The Fuel Companies	FPI034.008	GEN - General submission	General submission	Amend	Make any alternative or consequential relief as required to give effect to the submission, including any consequential relief required in any other sections of the ORPS that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the document; and any other relief required to give effect to the issues raised in the submission.
FPI011	Edgar Parcel	FPI011.001	GEN - General submission	General submission	Amend	ORC need to consult with the community a lot more
FPI011	Edgar Parcel	FPI011.002	GEN - General submission	General submission	Amend	The important of the primary sector of Otago not being articulated clearly enough within the document, there is a need for the primary sector to be recognised as a important land use as much as many others are through out the document.
FPI011	Edgar Parcel	FPI011.003	GEN - General submission	General submission	Amend	It is very important also to address the aspects of land use changes into the future which is not defined clearly.

FPI011	Edgar Parcel	FPI011.004	GEN - General submission	General submission	Amend	The identification of resources is not complete – e.g. a. Only criteria for Outstanding water bodies, landscapes, soils etc. We think the actual features should be identified in the RPS to allow the lower order documents to take more of an integrated approach Same can be said for native species and/or taoka species. There is no detail on what they are.
FPI042	Ngāi Tahu ki Murihiku	FPI042.014	GEN - General submission	General Submission	Amend	Recognise the role of the partnership between Kāi Tahu and Otago Regional Council that has resulted in co-development of text and provisions within the pORPS and preserve the intent of co-developed text and provisions.
FPI042	Ngāi Tahu ki Murihiku	FPI042.015	GEN - General submission	General Submission	Amend	Ensure that issues of significance identified by Kāi Tahu are addressed in the pORPS, just as the pORPS directs regional and district plans to manage these issues.
FPI042	Ngāi Tahu ki Murihiku	FPI042.016	GEN - General submission	General Submission	Amend	Ensure that provisions provide clear guidance about how to achieve objectives, including those relevant to Kāi Tahu in the Mana Whenua chapter and Integrated Management chapter, in situations where mapping is intended but as not yet occurred and when targets or limits are required but have not yet been set.
FPI042	Ngāi Tahu ki Murihiku	FPI042.017	GEN - General submission	General Submission	Amend	Provide further clarification within the pORPS provisions regarding the terms cultural landscapes and wāhi tupuna and the intended management approach for these areas, ensuring that it is possible for ngā Rūnanga to describe cultural landscapes or wāhi tupuna within decision-making processes in a manner that fits with their preferred approach, in order to be able to appropriately address effects on them. Reflect the following understanding of cultural landscapes and wāhi tupuna in provisions <ul style="list-style-type: none">- Cultural landscapes can be found across the region and described by mana whenua according to cultural values and mātauraka- Cultural landscapes can be described as wāhi tupuna- Some wāhi tupuna will be mapped and can include lands, waterbodies and parts of the coastal environment that need to be protected and managed in a culturally appropriate manner- Wāhi tupuna may include outstanding and highly valued natural features, landscapes and seascapes, outstanding water bodies, places and areas of historic heritage Some site specific land based wāhi tupuna will be mapped, including wāhi tapu and wāhi taoka, that need to be protected as they are particularly vulnerable to land uses
FPI042	Ngāi Tahu ki Murihiku	FPI042.142	GEN - General submission	General submission	Amend	All instances where “Wanaka” is mentioned should be amended to “Wānaka” with a macron
FPI031	Oceana Gold Ltd	FPI031.015	GEN - General submission	General Submission	Amend	OceanaGold also seeks any other or further consequential amendments which are not specifically set out in its submission but which will address its concerns.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.001	GEN - General submission	General submission	Amend	Amend as set out in submission. The outcomes sought and the wording used are suggestions only. Where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to [the FPI] including objectives, policies, or other provisions, or restructuring of [the FPI], or parts thereof, to give effect to the relief sought.

FPI039	Realnz	FPI039.002	GEN - General submission	Other	Amend	Insert new provisions or amend the current provisions to provide clearer policy direction about how competing interests for water take and use will be addressed.
FPI039	Realnz	FPI039.003	GEN - General submission	Other	Amend	Insert new provisions or amend the current provisions to provide clear policy direction that provides for the ability of people to clear debris/slip movements out of waterbodies or adjoining land
FPI042	Ngāi Tahu ki Murihiku	FPI042.001	GEN - General submission	Over-allocation	Amend	Recognise that over-allocation is a significant issue of concern for mana whenua in the region as identified in the earliest Regional Policy Statement for Otago. Provide further clarification within the pORPS provisions regarding management of over-allocation, both water quantity and water quality, including how to recognise over allocation when limits have not been set in a freshwater management unit (FMU) or part of an FMU.
FPI042	Ngāi Tahu ki Murihiku	FPI042.002	GEN - General submission	Specified infrastructure	Amend	Provide further clarification within the pORPS provisions regarding management of dams and weirs.

Definitions

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI037	Fish & Game	FPI037.026	DEF - Definitions	General submission	Amend	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.
FPI037	Fish & Game	FPI037.056	DEF - Definitions	General submission	Amend	Retain, subject to relief sought
FPI001	Dunedin City Council	FPI001.036	DEF – Definitions	New provision	Amend	Amend to include a definition of ‘water sensitive urban design’ within the pORPS.
FPI001	Dunedin City Council	FPI001.030	DEF – Definitions	New provision	Amend	Add a definition of ‘community drinking water supply.’
FPI026	Federated Farmers of New Zealand	FPI026.001	DEF - Definitions	Certified freshwater farm plan	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.001	DEF – Definitions	Certified freshwater farm plan	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.001	DEF – Definitions	Certified freshwater farm plan	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.001	DEF - Definitions	Certified freshwater farm plan	Support	Retain as notified.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.002	DEF - Definitions	Certified freshwater farm plan	Support	Retain as notified.
FPI026	Federated Farmers of New Zealand	FPI026.002	DEF - Definitions	Drinking water	Support	Retain as notified.
FPI020	Silver Fern Farms Ltd	FPI020.001	DEF – Definitions	Drinking water	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.002	DEF – Definitions	Drinking water	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.003	DEF – Definitions	Drinking water	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.002	DEF – Definitions	Drinking water	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.002	DEF - Definitions	Drinking water	Support	Retain as notified
FPI016	Meridian Energy Ltd	FPI016.001	DEF - Definitions	Drinking water	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.003	DEF - Definitions	Drinking water	Support	Retain as notified.
FPI020	Silver Fern Farms Ltd	FPI020.002	DEF – Definitions	National Objectives Framework	Support	Retain as notified.

FPI032	Te Rūnanga o Ngāi Tahu	FPI032.003	DEF – Definitions	National Objectives Framework	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.003	DEF – Definitions	National Objectives Framework	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.003	DEF - Definitions	National Objectives Framework	Support	Retain as notified
FPI016	Meridian Energy Ltd	FPI016.002	DEF - Definitions	National Objectives Framework	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.004	DEF - Definitions	National Objectives Framework	Support	Retain as notified.
FPI020	Silver Fern Farms Ltd	FPI020.003	DEF – Definitions	Natural hazard works	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.004	DEF – Definitions	Natural hazard works	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.004	DEF – Definitions	Natural hazard works	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.004	DEF – Definitions	Natural hazard works	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.004	DEF - Definitions	Natural hazard works	Support	Retain as notified
FPI016	Meridian Energy Ltd	FPI016.003	DEF - Definitions	Natural hazard works	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.005	DEF - Definitions	Natural hazard works	Support	Retain as notified.
FPI020	Silver Fern Farms Ltd	FPI020.004	DEF – Definitions	Other infrastructure	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.005	DEF – Definitions	Other infrastructure	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.005	DEF – Definitions	Other infrastructure	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.005	DEF – Definitions	Other infrastructure	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.005	DEF - Definitions	Other infrastructure	Support	Retain as notified
FPI016	Meridian Energy Ltd	FPI016.004	DEF - Definitions	Other infrastructure	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.006	DEF - Definitions	Other infrastructure	Support	Retain as notified.
FPI026	Federated Farmers of New Zealand	FPI026.003	DEF – Definitions	Over-allocation	Support	Retain as notified.
FPI020	Silver Fern Farms Ltd	FPI020.005	DEF – Definitions	Over-allocation	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.006	DEF – Definitions	Over-allocation	Support	Retain as notified.

FPI027	Contact Energy Limited	FPI027.006	DEF – Definitions	Over-allocation	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.006	DEF – Definitions	Over-allocation	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.006	DEF - Definitions	Over-allocation	Support	Retain as notified.
FPI016	Meridian Energy Ltd	FPI016.005	DEF - Definitions	Over-allocation	Support	Retain as notified.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.007	DEF - Definitions	Over-allocation	Support	Retain as notified.
FPI042	Ngāi Tahu ki Murihiku	FPI042.140	DEF - Definitions	Over-allocation	Amend	Clarify the meaning of ‘Over-allocation’ as it relates to the definition ‘Degraded’ when a limit has not been set in an FMU or part of an FMU
FPI020	Silver Fern Farms Ltd	FPI020.006	DEF – Definitions	Specified infrastructure	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.007	DEF – Definitions	Specified infrastructure	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.007	DEF – Definitions	Specified infrastructure	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.007	DEF – Definitions	Specified infrastructure	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.007	DEF - Definitions	Specified infrastructure	Support	Retain as notified.
FPI022	Manawa Energy Ltd	FPI022.001	DEF - Definitions	Specified infrastructure	Support	Retain this definition and ensure that clauses (a) and (b) of the definition are retained.
FPI016	Meridian Energy Ltd	FPI016.006	DEF - Definitions	Specified infrastructure	Support	Retain as notified.
FPI003	New Zealand Defence Force	FPI003.001	DEF - Definitions	Specified infrastructure	Support	Retain as notified.
FPI034	The Fuel Companies	FPI034.001	DEF - Definitions	Specified infrastructure	Support	Retain as notified.
FPI045	Forest & Bird	FPI045.001	DEF - Definitions	Specified infrastructure	Amend	“ <u>in relation to freshwater</u> , has the same meaning as in clause 3.21 of the National Policy Statement for Freshwater Management 2020 (as set out in the box below)”
FPI013	Transpower	FPI013.001	DEF - Definitions	Specified infrastructure	Amend	Retain the definition of ‘specified infrastructure’ as notified and, as a consequence, amend the definition of ‘regionally significant infrastructure’ as follows: <i>“means:</i> 1. roads classified as being of regional importance in accordance with the One Network Road Classification, 1. <i>x. the National Grid;</i> 2. <i>2. electricity sub-transmission infrastructure, ...”</i> As alternate relief, amend the definition of ‘specified infrastructure’ to include reference to the National Grid.
FPI026	Federated Farmers of New Zealand	FPI026.004	DEF – Definitions	Specified rivers and lakes	Support	Retain as notified.
FPI020	Silver Fern Farms Ltd	FPI020.007	DEF – Definitions	Specified rivers and lakes	Support	Retain as notified.

FPI032	Te Rūnanga o Ngāi Tahu	FPI032.008	DEF – Definitions	Specified rivers and lakes	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.008	DEF – Definitions	Specified rivers and lakes	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.008	DEF – Definitions	Specified rivers and lakes	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.008	DEF - Definitions	Specified rivers and lakes	Support	Retain as notified.
FPI016	Meridian Energy Ltd	FPI016.007	DEF - Definitions	Specified rivers and lakes	Support	Retain as notified.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.008	DEF - Definitions	Specified rivers and lakes	Support	Retain as notified.
FPI026	Federated Farmers of New Zealand	FPI026.005	DEF – Definitions	Wetland utility structure	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.009	DEF – Definitions	Wetland utility structure	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.009	DEF – Definitions	Wetland utility structure	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.009	DEF – Definitions	Wetland utility structure	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.009	DEF - Definitions	Wetland utility structure	Support	Retain as notified
FPI016	Meridian Energy Ltd	FPI016.008	DEF - Definitions	Wetland utility structure	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.009	DEF - Definitions	Wetland utility structure	Support	Retain as notified.

SRMR – Significant resource management issues for the region

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI038	NZSki Ltd	FPI038.017	SRMR - Significant resource management issues for the region	General submission	Amend	Insert new section to identify and discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources. This section should also identify and discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment.
FPI038	NZSki Ltd	FPI038.018	SRMR - Significant resource management issues for the region	General submission	Amend	Amend each "Impact Snapshot" to say "Adverse Impact Snapshot"
FPI039	Realnz	FPI039.019	SRMR - Significant resource management issues for the region	General submission	Amend	Insert new section to identify and discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources. This section should also identify and discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment.
FPI039	Realnz	FPI039.020	SRMR - Significant resource management issues for the region	General submission	Amend	Amend each "Impact Snapshot" to say "Adverse Impact Snapshot"
FPI037	Fish & Game	FPI037.057	SRMR - Significant resource management issues for the region	General submission	Amend	That all the relief sought by Fish and Game is generally reflected as solutions within the SRMR chapter, to be redrafted in its entirety
FPI001	Dunedin City Council	FPI001.003	SRMR – Significant resource management issues for the region	General submission	Amend	Amend to identify damming of the Clutha River/Mata-Au as a regionally significant issue and legacy effect. Amend to include relevant objectives and policies to address this issue.
FPI042	Ngāi Tahu ki Murihiku	FPI042.003	SRMR - Significant resource management issues for the region	General submission	Amend	Improve consistency of references to mana whenua values, cultural values and cultural well-being.
FPI037	Fish & Game	FPI037.006	SRMR - Significant resource management	New provision	Amend	<u>Add an additional issue as follows:</u> <u>SRMR-112 – Social, cultural and economic wellbeing of Otago’s communities depends on use and development of natural and physical resources</u>

			issues for the region			<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 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. 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>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>
FPI012	Minister For the Environment	FPI012.002	SRMR - Significant resource management issues for the region	Other - Not Stated	Amend	Recommend adding in a discussion around the over-allocation and the historic context of deemed mining permits.
FPI045	Forest & Bird	FPI045.002	SRMR - Significant resource management	SRMR-15	Support	Retain as notified

			issues for the region			
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.010	SRMR – Significant resource management issues for the region	SRMR-I5	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.010	SRMR - Significant resource management issues for the region	SRMR-I5	Support	Retain as notified
FPI031	Oceana Gold Ltd	FPI031.001	SRMR - Significant resource management issues for the region	SRMR-I5	Support	Retain as notified
FPI037	Fish & Game	FPI037.007	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	<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> <p>... These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values (including people’s wellbeing).</p> <p>...</p> <p>Alternatively, Fish & Game seek that the wording in SRMR I5 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>... 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><INSERT LINE TO CREATE NEW PARAGRAPH></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>

FPI038	NZSki Ltd	FPI038.020	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	<p>Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture (including irrigation), hydro-electric power supply, <u>tourism (for example water supply for visitor destinations and snowmaking)</u>, and mineral extraction. Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. At the same time other industries, such as tourism <u>activities</u> that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities.</p> <p>...</p> <p>Ensuring appropriate freshwater supply for human use is available <u>is essential</u>, including as part of planned urban growth is essential. It is possible this may require consideration of additional freshwater storage in the future. The region's freshwater assets also support a range of recreation uses, for example camping, fishing, water sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values (<u>including people's wellbeing</u>).</p>
FPI039	Realnz	FPI039.022	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	<p>Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture (including irrigation), hydro-electric power supply, <u>tourism (for example water supply for visitor destinations and snowmaking)</u>, and mineral extraction. Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. At the same time other industries, such as tourism <u>activities</u> that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities.</p> <p>...</p> <p>Ensuring appropriate freshwater supply for human use is available <u>is essential</u>, including as part of planned urban growth is essential. It is possible this may require consideration of additional freshwater storage in the future. The region's freshwater assets also support a range of recreation uses, for example camping, fishing, water sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values (<u>including people's wellbeing</u>).</p>
FPI043	OWRUG	FPI043.022	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	<p>Amend SRMR- I5 Statement as follows: In water-short catchments, freshwater availability may not be able to meet competing demands from the health and well-being needs of the environment <u>freshwater</u>, the health and well-being needs of people, and the ability of people and communities to provide for their social, economic and cultural well-being. Many of these catchments are also experiencing urban growth, changes in rural land uses <u>to meet food and fibre supply demands from growing populations and the need to implement change to respond to climate change, including increased demand for hydro-electricity.</u> Context...</p>

					<p>Population growth, <u>food and fibre production</u> and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social and cultural needs. <u>Whatever the outcome of those debates there will need to be significant change implemented over appropriate timeframes to adjust to the new allocation regime. Managing this transition carefully will be necessary to manage the impacts that will affect the social, economic and cultural wellbeing, including mental health of the community.</u></p> <p>Impact snapshot/environmental...</p> <p>Freshwater abstraction can reduce water level or flow and connections between different water bodies. This can negatively impact ecosystems by affecting freshwater habitat size and the shape and condition of the water body, including bed, banks, margin, riparian vegetation, connections to groundwater, water chemistry (for example by increasing concentrations of pollutants), and interaction between species and their habitat. How much an ecosystem is affected by taking freshwater is determined by departure from natural flow regimes, taking into account magnitude, frequency, timing, duration and rate of change, <u>species composition</u> and ecosystem capacity to recover. <u>How much an ecosystem is affected by taking of freshwater is typically determined by departure from natural flow regimes, taking into account the magnitude, frequency, timing duration and rate of change and ecosystem capacity to recover. However, in parts of Otago the flow regime that exists has been significantly altered due to the establishment of dams for water storage and hydro-electricity generation. In many cases these structures have been in place for many years (i.e. 80 to 100 years) and have values (including environmental, social and economic values) associated with them. These factors will in some instances affect the degree to which natural flow regimes can or should be restored. Further, exotic freshwater species, particularly salmonids are widespread with Otago's waterbodies. They are valued by the community as a source of food and for their sports fishing values. However, they also can have adverse effects on indigenous species. In some cases flow regimes induced by abstractions have protected indigenous species from predation. Changes to flow regimes will need to be carefully managed to ensure that these interactions do not give rise to significant loss of vulnerable indigenous species. These factors will in some instances affect the degree to which natural flow regimes can or should be restored.</u></p> <p>Impact snapshot/economic...</p> <p>Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply <u>and food production</u>). <u>Food and fibre production</u> (including irrigation and irrigation storage), hydro-electric power supply, and mineral extraction...</p> <p>Impact snapshot/social...</p> <p><u>Many communities in Otago are heavily reliant on the food and fibre sector which generates significant economic activity, as well as providing product to both the domestic and export market. Reduction in water allocation will adversely impact on the productive capacity of the food and fibre sector with significant downstream economic consequences. These economic consequences will manifest as reduced social cohesion in small communities as people move away to find other sources of employment, or the availability of locally grown food diminishes. However, there are also opportunities for increased employment associated with the transition to new land use types that may be precipitated by changes to allocation regimes and/or climate change adaption. Managing</u></p>
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						<u>this transition carefully will be necessary to manage the impacts that will arise for the social, economic and cultural wellbeing, including mental health of the community and seeking out opportunities that will improve these well-beings. In order to address these issues, providing certainty to resource users, including the food and fibre sector and a clear and integrated transition framework is necessary.</u>
FPI046	QLDC	FPI046.001	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	That the second paragraph of the context statement be amended as follows: Population growth and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses. <u>Some of these uses are more efficient and have greater beneficial effects on the environment and communities than others.</u> Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. <u>The RMA enables the allocation of water amongst competing activities.</u> However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social and cultural needs. Impact snapshot/economic... The economic benefits of urban development, tourism, <u>recreation</u> agriculture, energy production and water supply can be are positive for the Otago-Lakes' communities and visitors
FPI026	Federated Farmers of New Zealand	FPI026.006	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<i>SRMR-I5: Context</i> Amend as follows (or similar): Freshwater, including rivers and streams, lakes, groundwater systems, and wetlands, is a finite resource critical to the <u>region's</u> environment, society, and the economy. In Otago, access to, allocation, and use of freshwater reflects current demands and historical development and associated demands <u>“deemed permits” (water permits</u> under the RMA 1991) and a permissive water resource management regime. The deemed permits originated from mining licences issued under historic mining legislation and which enable water to continue to be used for a range of uses. Until October 2021. Population growth and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, <u>recreation, other social and cultural uses,</u> irrigation and other economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction <u>replenishment</u> limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social and cultural needs, <u>and critical to that is the need to provide for sufficient transitioning for any required change in resource use.</u> On 3 September 2020, new National Environmental Standards for Freshwater (NESF) and a new National Policy Statement for Freshwater Management (NPSFM) came into force. They have a goal of improving freshwater quality within five years, reversing past damage <u>degradation</u> and bringing New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation. The NPS- FM also clarified the need to provide first for the health and well-being of water bodies and freshwater ecosystems; then health and needs of people (such as drinking water); and finally then, the ability of

						people and communities to provide for their social, economic, and cultural well-being, now and in the future
FPI026	Federated Farmers of New Zealand	FPI026.007	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p><i>SRMR-I5: Impact Snapshot</i></p> <p>Amend the following sentences as follows (or similar):</p> <p>Freshwater abstraction can reduce water level or flow and connections between different water bodies. This can negatively impact <u>freshwater</u> ecosystems by affecting freshwater habitat, water quality, water quantity, and ecological processes. Size and the shape and condition of the water body, including bed, banks, margin, riparian vegetation, connections to groundwater, water chemistry (for example by increasing concentrations of pollutants), and interaction between species and their habitat.</p>
FPI026	Federated Farmers of New Zealand	FPI026.008	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p><i>SRMR-I5: Impact Snapshot – Social</i></p> <p>Amend the following sentence as follows (or similar):</p> <p>Ensuring appropriate freshwater supply for human use is available as part of planned urban growth <u>and to support rural communities and households</u> is essential</p>
FPI019	Fonterra Co-operative Group Ltd	FPI019.001	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p>Amend the text under the heading “Economic” to read:</p> <p>...</p> <p><i>Economic</i></p> <p><i>Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture, <u>industry, rural industry</u>, hydro-electric power supply, and mineral extraction.</i></p> <p>...</p>
FPI023	Moutere Station Ltd	FPI023.001	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p>Make the following amendments to SRMR-I5 – Freshwater demand exceeds capacity in some places – Environmental (<i>Inferred</i>):</p> <p>Freshwater abstraction can reduce water level or flow and connections between different water bodies. <u>Freshwater abstraction may also assist with maintaining the ecosystem by reducing weed and willow pressure and sustaining indigenous species.</u> This can negatively impact ecosystems by affecting freshwater habitat size and the shape and condition of the water body, including bed, banks, margin, riparian vegetation, connections to groundwater, water chemistry (for example by increasing concentrations of pollutants), and interaction between species and their habitat. How much an ecosystem is affected by taking freshwater <u>will require a consideration of the ecosystem of the farming system as a whole and may be determined by departure from <u>existing extraction</u>, natural flow regimes, taking into account magnitude, frequency, timing, duration and rate of change, and ecosystem capacity to recover.</u></p>
FPI023	Moutere Station Ltd	FPI023.002	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p>Make the following amendments to SRMR-I5 – Freshwater demand exceeds capacity in some places – Economic (<i>Inferred</i>):</p> <p>Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture (including irrigation), hydro-electric power supply, and mineral extraction. Freshwater <u>and agriculture</u> also indirectly</p>

						<p>contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. <u>Lack of freshwater will disproportionately impact agriculture and have a devastating impact on the economy in Otago. Can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. A change in the type of irrigation may result in more efficiencies but the availability to change irrigation will be limited given the land use and contour make types of irrigation more suitable to each location. At the same time other industries, such as tourism that rely on the aesthetic characteristic of rivers and lakes and agricultural land. To them and instead rely on management regimes that sustain flows and water levels suitable for their activities.</u></p>
FPI023	Moutere Station Ltd	FPI023.003	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p>Make the following amendments to SRMR-I5 – Freshwater demand exceeds capacity in some places – Social (<i>Inferred</i>):</p> <p>Ensuring appropriate freshwater supply for human <u>and community</u> use is available as part of planned urban growth <u>and maintaining rural communities</u> is essential. It is possible this may require consideration of additional freshwater storage in the future. The region’s freshwater assets also support a range of recreation uses, for example camping, fishing, water sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows <u>may</u> have a corresponding negative impact on social and cultural values <u>in specific areas</u>.</p>
FPI020	Silver Fern Farms Ltd	FPI020.008	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p>Amend the text under the “Economic” sub-heading to read:</p> <p>Economic Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture, <u>industry, including rural industry</u>, hydroelectric power supply, and mineral extraction.</p> <p>Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures, <u>development of water storage</u> and innovation. At the same time other industries, such as tourism that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities.</p>
FPI001	Dunedin City Council	FPI001.004	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p>Amend to clearly identify where ‘deemed permits’ are a key problem in Otago.</p>
FPI027	Contact Energy Limited	FPI027.010	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	<p>Contact seeks that the issue statement is amended to appropriately recognise the critical importance of renewable electricity generation to achieving New Zealand’s emission reduction targets; and to more appropriately recognise the directions within the NPSFM and NPSREG.</p>

					<p>Suggested amendments to the background document version are set out below, by way of example:</p> <p>SRMR-15 – Freshwater demand exceeds capacity in some places</p> <p>Statement</p> <p>...</p> <p>Context</p> <p>...</p> <p>Population growth and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of <u>prioritise protection of the mauri of water bodies, meet the health needs of people, and provide for economic, environmental, social and cultural needs well-being</u> recognise Te Mana o te Wai, including protecting the health and mauri of freshwater; and restoring the balance between the water, the wider environment and the community.</p> <p>On 3 September 2020, new National Environmental Standards for Freshwater (NESF) and a new National Policy Statement for Freshwater Management (NPSFM) came into force. They have a goal of improving freshwater quality within five years, reversing past damage <u>degradation</u> and bringing New Zealand’s freshwater resources, waterways and ecosystems to a healthy state within a generation. The NPS-FM also clarified the need to provide first for the health and well-being of water bodies and freshwater ecosystems; then health and needs of people (such as drinking water); and finally the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</p> <p>...</p> <p>Impact snapshot</p> <p>...</p> <p>Economic</p> <p>...</p> <p>Social</p> <p>...</p> <p><u>Climate change and renewable electricity generation</u></p> <p><u>Protecting and maximising the generation capacity, storage, and operational flexibility of the Clutha Hydro Scheme is essential to climate change mitigation, which in turn is an essential part of protecting the environment as well as providing for the economic and social wellbeing of people and communities. Providing for the development, operation, maintenance, and upgrading of new and existing hydro-electricity generation is also required to give effect to the NPSREG.</u></p>
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FPI024	DairyNZ Limited	FPI024.010	SRMR – Significant resource management issues for the region	SRMR-I5	Amend	Amend the issues to include both negative and positive aspects of resource use in the Impact snapshots, including the important, positive contribution of primary industries to the Otago economy and the importance of reliable access to water for primary production. Address identified knowledge gaps in methods and monitoring.
FPI022	Manawa Energy Ltd	FPI022.002	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Retain the wording under the ‘economic’ heading as notified. Amend the wording under the ‘social’ heading as follows: The region’s <i>freshwater</i> assets also support a range of recreation uses, for example camping, fishing, <i>water</i> sports, and swimming. <u>The use of freshwater for renewable electricity generation provides and supports a range of activities, associated with people’s wellbeing.</u> These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values
FPI016	Meridian Energy Ltd	FPI016.009	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Amend <i>SRMR-I5, Context</i> by adding the following paragraph (or words of similar effect): <i>The Clutha hydro-electricity generation scheme, which is located in the Otago region, is one of New Zealand’s largest renewable electricity generators. Renewable electricity generation is key to meeting New Zealand’s greenhouse gas emission targets and thereby mitigating climate change, and to maintaining the security of New Zealand’s electricity supply. The National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Freshwater Management 2020 set policy direction on the management of freshwater as part of New Zealand’s integrated response to climate change. This includes (amongst other requirements) recognising and providing for the national significance of renewable electricity generation by maintaining or increasing electricity generation capacity and having particular regard to the need to protect the related assets, operational capacity and continued availability of the renewable energy resource.</i>
FPI007	John Highton	FPI007.001	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	More detail on deemed permits including that this is a particular problem for Otago that has many more mining rights than other parts of NZ. Some of the complexities of this issue could be indicated especially those brought about by delays in making decisions relating to this issue.
FPI042	Ngāi Tahu ki Murihiku	FPI047.004	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Include discussion of over-allocation of water resources in Otago and amend the final sentence of the second paragraph under the heading Context, as follows: “... freshwater allocations can be adjusted to achieve a balance of <u>prioritise protection of the mauri of water bodies, meet the health needs of people, and provide for economic, environmental, social and cultural needs wellbeing</u> ”
FPI047	Horticulture New Zealand	FPI047.008	SRMR - Significant resource management	SRMR-I5	Amend	Amend SRMR-I5 statement as follows: “... Many of these catchments are also experiencing urban growth, changes in rural land uses <u>to meet food supply demands of growing urban populations and will continue to</u>

			issues for the region			<u>change to respond to climate change</u> , and increased demand for hydro-electric generation.”
FPI047	Horticulture New Zealand	FPI047.009	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Amend SRMR-I5 context as follows: “... Population growth, <u>food production</u> and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses.
FPI047	Horticulture New Zealand	FPI047.009	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Amend the impact snapshot to specifically the health and safety issues associated with water demand including drinking, sanitation and food production. Link the impact snapshot to the FMU vision statements seeking outcomes whereby innovative and sustainable and water management practices support food production and improve resilience to the effects of climate change.
FPI041	McArthur Ridge Vineyard Ltd	FPI041.001	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Delete the term “ <i>Agriculture</i> ” and replace with “ <i>primary production</i> ”. <i>...contributes to human needs (urban water supply), agriculture <u>primary production</u> (including irrigation), hydroelectric...</i>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.010	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Remove reference to goal of improving freshwater quality within 5 years.
FPI009	Central Otago Winegrowers Association	FPI009.001	SRMR - Significant resource management issues for the region	SRMR-I5	Amend	Retain Impact Snapshot – Economic as notified. Or otherwise amend to give effect to the relief sought in this submission.
FPI045	Forest & Bird	FPI045.003	SRMR - Significant resource management issues for the region	SRMR-I6	Support	Retain as notified
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.011	SRMR – Significant resource management issues for the region	SRMR-I6	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.011	SRMR – Significant resource management issues for the region	SRMR-I6	Support	Retain as notified.

FPI030	Kāi Tahu ki Otago	FPI030.011	SRMR - Significant resource management issues for the region	SRMR-I6	Support	Retain as notified
FPI031	Oceana Gold Ltd	FPI031.002	SRMR - Significant resource management issues for the region	SRMR-I6	Support	Retain as notified
FPI037	Fish & Game	FPI037.008	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	<p>Alternatively, Fish & Game seek that the wording in SRMR I6 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>... 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 these <u>recreation</u> activities, the lifestyle of those living in Otago is impacted.</p>
FPI038	NZSki Ltd	FPI038.021	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	<p>Declining water quality has adverse effects on the <u>natural</u> environment, our communities, and the economy</p> <p>...</p> <p>While the pristine areas of Otago generally maintain <u>very</u> good water quality, some areas of Otago demonstrate poorer quality and declining trends in water quality which can be attributed to discharges from land use intensification (both rural and urban) and land management practices. Erosion, run-off and soil loss can lead to sediment and nutrients being deposited into freshwater bodies resulting in declining water quality</p>
FPI039	Realnz	FPI039.023	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	<p>Declining water quality has adverse effects on the <u>natural</u> environment, our communities, and the economy</p> <p>...</p> <p>While the pristine areas of Otago generally maintain <u>very</u> good water quality, some areas of Otago demonstrate poorer quality and declining trends in water quality which can be attributed to discharges from land use intensification (both rural and urban) and land management practices. Erosion, run-off and soil loss can lead to sediment and nutrients being deposited into freshwater bodies resulting in declining water quality</p>
FPI043	OWRUG	FPI043.023	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	<p>Statement...</p> <p>...which can be attributed to discharges from land use activities (both rural and urban), land management practices <u>and aquatic pest species.</u></p> <p>Context...</p> <p>The health of water is vital for the health of the environment, people and the economy. It is at the heart of culture and identity. Nationally, and in parts of Otago, freshwater is facing significant pressure. Population growth and <u>poorly managed</u> land-use in urban</p>

						<p>and rural environments has impacted the quality of water, increasing contamination from nutrients and sediment.</p> <p>Water quality affects a wide range of environmental health factors, human <u>health and survival needs</u>, and cultural, social, recreational, and economic uses.</p> <p>Add the following to the 3rd paragraph: <u>The direction in this higher order document is significant and will precipitate changes within the Otago Region. The direction of travel required by these documents has broad community support, however the detail regarding the degree of change and over what timeframe remain as points of contention within some communities. Whatever the outcome affected communities face a period of significant change which will be very challenging and may have adverse consequences for people and communities. This transition requires careful management in order to maintain social cultural and economic wellbeing, including mental wellbeing.</u></p> <p>Impact snapshot/environmental...</p> <p>Despite the region's lakes and rivers being highly valued by Otago communities, reports indicate there are reasons for concern about water quality and its trends in <u>some areas</u> with consequent potential impact on ecosystems and people.</p> <p>... Otago's central lakes are impacted by increased population, urban development, <u>aquatic pests</u> and tourism demand;</p> <p>Activities such as agricultural <u>land use</u>, mining, and forestry also contribute. <u>Poorly managed agricultural land-use</u> also contributes to nutrients (nitrogen and phosphorus) leaching into underlying groundwater or running off into surface water bodies, and can also increase the risk of E.coli contamination from animal waste.</p> <p>Impact snapshot/economic...</p> <p>... Water pollution (from nutrients, chemicals, pathogens and sediment) can have far-reaching effects potentially impacting tourism, property values, commercial fishing, recreational businesses, <u>human health, food production</u> and many other sectors that depend on clean water.</p> <p>Impact snapshot/social...</p> <p>For the wider community, wWater is a source of kai <u>for harvesting and food production</u>. And</p> <p><u>Water is also a source of recreation</u>, including swimming, fishing and water sports. Otago's rivers, lakes, estuaries and bays are important destinations for recreational use including swimming, fishing and water sports. Eighty-two per cent of Otago's rivers and lakes are swimmable.³³ Where water quality cannot support these activities, the lifestyle of those living in Otago is impacted. <u>Thriving rural communities are also supported by the use of good quality water for food and fibre production.</u></p> <p>Where water quality is degraded quality the taoka habitats and species supported by the water may be adversely affected reduces and the mauri of the water reduced, and the habitats and species it supports, therefore also negatively affecting mahika kai and taoka species and places. This Loss of mahika kai and taoka species <u>constitutes is</u> a loss of Kāi Tahu culture, affecting the intergenerational transfer of knowledge handed down from tūpuna over hundreds of years; and it culminates in a loss of rakatirataka and mana.</p>
FPI026	Federated Farmers of New Zealand	FPI026.009	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p><i>SRMR-I6: economic</i></p> <p>Amend to include consideration of the future need for water storage</p>
FPI026	Federated Farmers of New Zealand	FPI026.010	SRMR – Significant resource	SRMR-I6	Amend	<p><i>SRMR-I6: Social</i></p>

			management issues for the region			Amend the Social Impact Snapshot by adding reference to the positive contribution the primary sector makes to the region
FPI026	Federated Farmers of New Zealand	FPI026.011	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p><i>SRMR-I6: Declining water quality has adverse effects on the environment, our communities, and the economy – Statement.</i></p> <p>Amend as follows (or similar):</p> <p><i>While the pristine areas of Otago generally maintain good water quality, some areas of Otago demonstrate poorer quality and declining trends in water quality which can <u>often</u> be attributed to discharges from land use intensification (both rural and urban) and land management practices.</i></p> <p><u>Some previously degraded areas are seeing the beginnings of a turnaround with improving trends, but there is still much work to be done.</u></p>
FPI026	Federated Farmers of New Zealand	FPI026.012	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>SRMR-16: Context</p> <p>Amend the following sentence as follows:</p> <p>On 3 September 2020, new National Environmental Standards (NESF) and a new National Policy Statement (NPSFM) came into force to improve water quality within five years; and reverse past damage degradation <u>as soon as practicable</u>, and bring New Zealand’s freshwater resources, waterways and ecosystems to a healthy state within a generation.</p>
FPI026	Federated Farmers of New Zealand	FPI026.013	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>SRMR-I6: Impact Snapshot – Environmental</p> <p>Amend as follows (or similar) (inferred):</p> <p><u>Otago water systems are highly varied and include as well as lakes and rivers, scroll plains and saltwater lakes.</u> Despite the region’s lakes and rivers being highly valued by Otago communities, reports indicate there are reasons for concern in <u>specific areas</u> about water quality and its trends with consequent potential impact on ecosystems and people. Water quality across Otago is variable <u>with some areas such as the Upper Clutha and the upper Taieri having excellent water quality, with other areas, such as urban streams in the Dunedin locale, intensified catchments in North Otago and some tributaries of the Pomahaka having poorer water quality.</u> River water quality is best at river and stream reaches located at high or mountainous elevations under predominantly native vegetation cover, and mostly good in the upper areas of large river catchment and outlets from large lakes. <u>These sites tend to be associated with the upper catchments of larger rivers (e.g. Clutha River/Matau-Au, Taieri River and Lindis River) and the outlets from large lakes (e.g. Hawea, Wakatipu and Wanaka).</u></p> <p>Water quality is generally poorer in smaller low-elevation streams and coastal shallow lakes where they receive water from upstream pastoral areas or urban catchments. For example, catchments such as the Waiareka Creek (<u>North Otago</u>), <u>Owhiro Stream (Mosgiel)</u>, Kāikorai Stream (<u>Dunedin</u>), and <u>sub-catchments within</u> the lower Clutha catchment, have some of the worst poorest water quality in the region. <u>The Waikouaiti River has the best water quality of the lowland sites.</u></p>

						<p>Farmed livestock can negatively impact unfenced riparian areas but can also have a positive impact by managing weeds and aggressive introduced grasses. Feral pests entering water bodies can lead to pugging and destruction of riparian compaction of soils and beds that play an important role in filtering contaminants areas, as well as excreting directly in waterways. The growing practice of wintering cattle in Otago can exacerbate leaching effects, which may not connect to surface water until spring, creating spikes in nutrient loads.</p> <p>Catchment group initiatives in Otago are making positive changes in terms of addressing water quality concerns in local areas.</p>
FPI026	Federated Farmers of New Zealand	FPI026.014	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>SRMR-I6: Impact Snapshot – Economic</p> <p>Amend as follows or similar: Water pollution (from <u>contaminants</u>, nutrients, chemicals, pathogens and sediment) can have far-reaching effects potentially impacting <u>the primary sector</u>, tourism, property values, commercial fishing, recreational businesses, and many other sectors that depend on clean water</p>
FPI026	Federated Farmers of New Zealand	FPI026.015	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>SRMR-I6: Impact Snapshot – Social</p> <p>Amend as follows or similar: For the wider community, water is a source of kai and of recreation, including swimming, fishing and water sports. Otago’s rivers, lakes, estuaries and bays are important destinations for recreational use including swimming, fishing and water sports. Eighty-two per cent of Otago’s rivers and lakes are swimmable, <u>which is very high on a nationwide comparison</u>. However, where water quality cannot support these activities, the lifestyle of those living in Otago is impacted.</p>
FPI019	Fonterra Co-operative Group Ltd	FPI019.002	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>Include a new “significant resource management issue” focusing on the impact that restricted resource use may have on the social and economic well-being of the region.</p> <p>Or amend SRMR-I6 as follows: SRMR-I6 – Declining water quality has adverse effects on the environment, our communities, and the economy</p> <p>...</p> <p>Sediment is a key issue for freshwater quality throughout Otago, including coastal estuaries where it can significantly impact the life supporting capacity of waterways. <u>While a critical element of our social construct, Urban development is a key generator of sediment input to lakes and rivers in Central Otago, from building platforms and from stormwater contamination. Activities such as agricultural intensification land use, mining, and forestry are critical to our social and economic wellbeing, but also contribute to sedimentation.</u></p> <p>...</p> <p><u>Well-functioning Urban environments is a matter of national significance and relies on the ability to use natural resources, for example, for discharges of (treated) stormwater and wastewater. But urban development can degrade water quality including the flushing of unfiltered contaminants include hydrocarbons, and metals from roads and structures. They often wash into urban</u></p>

						<p>stormwater systems and pass unfiltered into water bodies, or the coastal marine area; Stormwater effects, particularly in urban areas, are poorly understood. And inadequacies with wastewater and stormwater systems may not be adequate in some places due to aging infrastructure, rapid growth pressure, or insufficient investment in replacement or upgrades. Overflows of wastewater (sewage and waste products) create significant risks for water quality. These can enter the environment either directly or through stormwater systems, particularly in flood events.</p> <p>Economic</p> <p>...</p> <p>These impacts can be direct (varying the quality of primary production outputs such as fish); increasing costs of production through mitigation or remediation costs (drinking water treatment cost, riparian restoration); loss of enjoyment and benefit from tourism uses, and indirect such as cost to human health and associated medical costs, or reduction in brand value (e.g. Brand New Zealand).</p> <p><u>Conversely, the inability for our business sectors to use freshwater and coastal water resources (within environmental limits) to support business operations will likely also have far reaching effects on the social and economic wellbeing of the people and the region. The cost of regulatory compliance is also an economic cost for businesses seeking to continue to operate within environmental limits.</u></p> <p>...</p>
FPI023	Moutere Station Ltd	FPI023.004	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>Delete SRMR-I6 – Declining water quality has adverse effects on the environment, our communities, and the economy – Environmental (<i>Inferred</i>)</p> <p>Despite the region’s lakes and rivers being highly valued by Otago communities, reports [insert the titles and authors of the reports and identify the particular areas or land use types of concern]. The agricultural community values the region’s lakes and rei indicate there are reasons for concern about water quality and its trends with consequent potential impact on ecosystems and people.</p> <p>Agricultural intensification close to waterways also contributes to nutrients (nitrogen and phosphorus) leaching into underlying groundwater or running off into surface water bodies. And can may also increase the risk of E.coli contamination from animal waste.</p> <p>Add:</p> <p>Any change in agricultural use must consider that the economic health of farms depends on their environmental health – healthy waterways, healthy pastures, healthy animals contribute to more production and a more positive market image for local and foreign buyers. Any regulation must recognise that farmers have maintained the healthy waterways for many generations but there are some areas for improvement, notably [insert specific land use concerns and areas that have higher rates of E.Coli]. The Council recognises that it is beneficial for the landowner to take responsibility for maintaining and improving healthy waterways on their farm at a reasonable rate.</p>
FPI023	Moutere Station Ltd	FPI023.005	SRMR – Significant resource management	SRMR-I6	Amend	<p>Make the following amendments to SRMR-I6 – Declining water quality has adverse effects on the environment, our communities, and the economy – Economic (<i>Inferred</i>):</p>

			issues for the region			Water pollution (from nutrients, chemicals, pathogens and sediment) can <u>identify the specific locations in Otago</u> may have far-reaching effects potentially impacting <u>rural communities, agriculture, tourism, property values, commercial fishing, recreational businesses, and many other sectors that depend on clean water</u> . These impacts can be direct (varying the quality of primary production outputs such as fish or <u>unhealthy stock</u>); increasing costs of production through mitigation or remediation costs (drinking water treatment cost, riparian restoration); loss of enjoyment and benefit from tourism uses, and indirect such as cost to human health and associated medical costs, or reduction in brand value (e.g. Brand New Zealand). <u>Low stock rate farming systems are unique and it is acknowledged that they can maintain and improve water quality</u> . <u>The economic impact as a result of any decreased application of nutrients and therefore decreased production will also have far reaching effects, including tourism, farm values, agricultural output, exports, recreational hunting, and the large percentage of the population that rely on agriculture for employment.</u>
FPI020	Silver Fern Farms Ltd	FPI020.009	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>Amend as follows.</p> <p>Statement While the pristine areas of Otago generally maintain good water quality, some areas of Otago demonstrate poorer quality and declining trends in water quality which can be attributed to discharges from land use intensification (both rural and urban) and land management practices. Erosion, run-off and soil loss can lead to sediment and nutrients being deposited into freshwater bodies resulting in declining water quality. <u>As such, there is a need to manage activities that affect water quality to achieve appropriate environmental, social, cultural and economic outcomes.</u></p> <p>Context The health of water is vital for the health of the environment, people and the economy. It is at the heart of culture and identity. Nationally, and in parts of Otago, freshwater is facing significant pressure. Population growth and land-use intensification in urban and rural environments has impacted the quality of water, increasing contamination from nutrients and sediment. Water quality affects a wide range of environmental health factors, human survival needs (<u>such as drinking water supply and food production</u>), and cultural, social, recreational, and economic uses. Some of the biggest impacts on water quality in Otago are considered to come from agriculture and urbanisation, through diffuse discharges and point source discharges. On 3 September 2020, new National Environmental Standards (NESF) and a new National Policy Statement (NPSFM) came into force to improve water quality within five years; and reverse past damage and bring New Zealand’s freshwater resources, waterways and ecosystems to a healthy state within a generation.</p>
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.014	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	<p>IMP5 – We support the objective to achieve ‘Coordinated management and integration of natural and physical resources beyond immediate boundaries, and effects of activities’, beyond the freshwater management subunits, and on other values and environments. Consideration of subunits should sit within catchments and within broader ecosystems, including the impacts on and of freshwater management (or mismanagement) also</p>

						impacting marine (ref SRMR 16, 17 & 18[<i>inferred: 16, 17 & 18</i>]) and terrestrial ecology and broader systems such as the climate.
FPI024	DairyNZ Limited	FPI024.011	SRMR – Significant resource management issues for the region	SRMR-I6	Amend	Amend the issues to include both negative and positive aspects of resource use in the Impact snapshots, including the important, positive contribution of primary industries to the Otago economy and the importance of reliable access to water for primary production. Address identified knowledge gaps in methods and monitoring. Delete the following sentence: The growing practice of wintering cattle in Otago can exacerbate leaching effects, which may not connect to surface water until spring, creating spikes in nutrient loads.
FPI007	John Highton	FPI007.002	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	More acknowledgement that the deterioration of water quality has occurred while current ORC management policies applied and so that change of focus and tightening of policy is required. Water monitoring is referenced. In my opinion this is something that has been done particularly poorly under the present plan and requires substantially more emphasis in this policy statement
FPI014	Rayonier Matariki Forests	FPI014.001	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	<i>Insert “pastureland or farming” before the words “agriculture intensification”.</i>
FPI014	Rayonier Matariki Forests	FPI014.002	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	In the context section insert a new reference to the NES-PF as follows: “In May 2018 a new national environmental standard NES-PF ws introduced to manage the effects of specified forestry activities including managing the effects of the generation of sediment.”
FPI047	Horticulture New Zealand	FPI047.010	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	Amend Context as follows: ...Water quality affects a wide range of environmental health factors, human <u>health and</u> survival needs, and cultural, social, recreational, and economic uses.
FPI047	Horticulture New Zealand	FPI047.011	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	Amend the impact snapshot / economic to specifically the health and safety issues associated with water quality including drinking, sanitation, and food production. Link the impact snapshot to the FMU vision statements seeking outcomes whereby innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change
FPI047	Horticulture New Zealand	FPI047.012	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	Water pollution (from nutrients, chemicals, pathogens and sediment) can have far-reaching effects potentially impacting <u>food production</u> , tourism, property values, commercial fishing, recreational businesses, and many other sectors that depend on clean water

FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.011	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	<p>Delete specific reference to stock access and winter grazing from the Environmental Impact Snapshot. If not deleted in its entirety, specifically recognise that these are regulated under the Resource Management Stock Exclusion Regulations 2020 and National Environment Standard for Freshwater as part of the wider Essential Freshwater Package 2020. If not deleted in its entirety, describe, and distinguish effects of urban development to the same extent as agricultural land uses. In addition to the relief requested in Submission Point 12 of the 2021 submission, amend the opening statement of SRMR-16 as follows:</p> <p>While the pristine areas of Otago generally maintain good water quality, some areas of Otago demonstrate poorer quality and declining trends in water quality which can be attributed to discharges <u>of contaminants including nutrients</u> from land use intensification (both rural and urban) and land management practices. Erosion, run-off and soil loss <u>from rural and urban activities</u> can lead to sediment and nutrients being deposited into freshwater bodies resulting in declining water quality.</p> <p>Amend the text of the Context section of SRMR-16 as follows:</p> <p>On 3 September 2020, new Environmental Standards (NESF), came into force, including restrictions on some agricultural practices and stock access to waterbodies, that apply in addition to regional plan rules. The and a new National Policy (NPSFM)²⁷ introduced a hierarchy of obligations to recognise the fundamental importance of water and restore and preserve the balance between the water, the wider environment and the community. came into force to improve water quality, within five years; and reverse past damage and bring New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation.</p>
FPI009	Central Otago Winegrowers Association	FPI009.002	SRMR - Significant resource management issues for the region	SRMR-I6	Amend	<p>Amend SRMR-I6 – Context</p> <p><i>Water</i> quality affects a wide range of environmental health factors, human survival needs, and cultural, social, recreational, and economic uses. Some of the biggest impacts on <i>water</i> quality in Otago are considered to come from <u>poorly managed</u> agriculture and urbanisation, through diffuse <i>discharges</i> and point source <i>discharges</i>.</p>
FPI045	Forest & Bird	FPI045.004	SRMR - Significant resource management issues for the region	SRMR-I9	Support	Retain as notified
FPI026	Federated Farmers of New Zealand	FPI026.017	SRMR – Significant resource management issues for the region	SRMR-I9	Support	<p><i>SRMR-I9: Economic</i></p> <p>Support the recognition of agriculture.</p>
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.012	SRMR – Significant resource management	SRMR-I9	Support	Retain as notified.

			issues for the region			
FPI030	Kāi Tahu ki Otago	FPI030.012	SRMR - Significant resource management issues for the region	SRMR-I9	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.012	SRMR - Significant resource management issues for the region	SRMR-I9	Support	Retain as notified.
FPI037	Fish & Game	FPI037.009	SRMR - Significant resource management issues for the region	SRMR-I9	Amend	<p>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 attract visitors and residents from around the region, the country and the world. This 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 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>
FPI038	NZSki Ltd	FPI038.023	SRMR - Significant resource management issues for the region	SRMR-I9	Amend	<p>However, water quality is being adversely impacted by increased population <u>and urban development and tourism demand</u> which is straining existing waste management infrastructure...</p> <p>...</p> <p>...Natural features and landscape values <u>are can</u> also be adversely impacted by tourism <u>and development</u>, urban growth, and energy production.</p> <p>...</p> <p>For example, the clean green image of New Zealand, of which the Otago Lakes area is symbolic, is at risk of being compromised <u>because of over-crowding in peak tourism seasons if the quality of lakes becomes degraded or visitor numbers exceed the servicing capacity of the district.</u></p> <p>...</p> <p><u>Poorly managed activities and over-crowding impacts can</u> adversely affect recreation experiences of both tourists and residents, <u>particularly outdoor recreation such as fishing and water sports, and urban amenity.</u> Infrastructure capacity limits can, for example, result in an increased number of wastewater overflows <u>into</u> the environment when demand on the network exceeds capacity. These can have significant adverse impacts on human health <u>including recreation opportunities</u> as well as recreational amenity.</p>

FPI039	Realnz	FPI039.025	SRMR - Significant resource management issues for the region	SRMR-I9	Amend	<p>However, water quality is being adversely impacted by increased population <u>and</u> urban development and tourism demand which is straining existing waste management infrastructure...</p> <p>...</p> <p>...Natural features and landscape values are <u>can</u> also be adversely impacted by tourism and development, urban growth, and energy production.</p> <p>...</p> <p>For example, the clean green image of New Zealand, of which the Otago Lakes area is symbolic, is at risk of being compromised because of over-crowding in peak tourism seasons <u>if the quality of lakes becomes degraded or visitor numbers exceed the servicing capacity of the district.</u></p> <p>...</p> <p><u>Poorly managed activities and over-crowding impacts</u> can adversely affect recreation experiences of both tourists and residents, <u>particularly outdoor recreation</u> such as fishing and water sports, and urban amenity. Infrastructure capacity limits can, for example, result in an increased number of wastewater overflows <u>into</u> the environment when demand on the network exceeds capacity. These can have significant adverse impacts on human health <u>including recreation opportunities</u> as well as recreational amenity.</p>
FPI043	OWRUG	FPI043.026	SRMR - Significant resource management issues for the region	SRMR-I9	Amend	Amend 'agriculture' to " the Primary Sector' throughout this Issue
FPI046	QLDC	FPI046.002	SRMR - Significant resource management issues for the region	SRMR-I9	Amend	<p>That the context statement be amended to read as follows:</p> <p>.... This desire of New Zealanders and international visitors to enjoy the outstanding natural environments of the Otago lakes has placed significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. At the same time the economy of the Otago lakes area is heavily dependent on tourism. For example, in 2020, tourism employment accounted for an estimated 56% (or 17,758) of the jobs in the Queenstown-Lakes district; tourism GDP accounted for 43.7% (or NZ \$1.7 billion) of the district's GDP and international tourism contributed 64% (or NZ \$1.89 billion). The Otago-Lakes area also supplies significant renewable energy for use in Otago and beyond.</p>
FPI026	Federated Farmers of New Zealand	FPI026.016	SRMR – Significant resource management issues for the region	SRMR-I9	Amend	<p>SRMR-I9: Context</p> <p>Amend as follows or similar: Healthy lakes are one of Otago's most valued natural resources and for the most part water quality is good. The values assigned to lakes include the natural features and landscapes, the quality and quantity of water accessible to the Otago communities, the accessibility of these resources for recreation, the health of native flora and fauna associated with Otago's rivers and lakes, <u>livestock, irrigation</u>, and renewable energy production</p>
FPI027	Contact Energy Limited	FPI027.012	SRMR – Significant resource management	SRMR-I9	Amend	<p>Contact seeks amendments to address its concerns.</p> <p>Suggested amendments are set out below by way of example:</p>

			issues for the region		<p>SRMR-19 – Otago lakes are subject to pressures from tourism and population growth Statement</p> <p>The beauty, recreational opportunities and regional climate of Lakes Wanaka, Wakatipu, Hāwea and Dunstan and their environs attract visitors and residents from around the region, the country and the world. This influx brings economic opportunity, but the activities and services created to take advantage of it can degrade the environment and undermine the experience that underpins their attractiveness. <u>Lake Hāwea, Te Wairere / Lake Dunstan and Lake Roxburgh play a critical role in the Clutha Hydro Scheme, which is recognised by the National Policy Statement for Freshwater Management as making an important contribution to meeting New Zealand’s greenhouse gas emission targets; and maintaining the security of New Zealand’s electricity supply. It is therefore important that the contribution of these lakes to the Clutha Hydro Scheme is safeguarded.</u></p> <p>Context</p> <p>Healthy lakes are one of Otago’s most valued natural resources and for the most part water quality is good. The values assigned to lakes include the natural features and landscapes, the quality and quantity of water accessible to the Otago communities, the accessibility of these resources for recreation <u>and transport</u>, the health of native flora and fauna associated with Otago’s rivers and lakes, and <u>the nationally significant contribution of these lakes to renewable energy production electricity generation activities and the decarbonisation of the region (including its businesses and tourism), and nation’s, economy.</u> It is also recognised that <u>Te Wairere / Like Dunstan and Lake Roxburgh were created by the dams associated with the Clutha Hydro Scheme, and Lake Hāwea is a modified and significant hydro-storage lake, and the Scheme is a key contributing factor to the characters of these lakes.</u></p> <p>Urban growth is adversely affecting the natural features and landscapes around the lakes. The amount of growth is demonstrated in the Queenstown Lakes District, including Queenstown and Wanaka, where the population tripled in the last 20 years from 16,750 in 1999 to 47,400 in 2020. Continued growth is projected over the 30 years from 2020 to 2050 (by 63%).</p> <p>This desire of New Zealanders and international visitors to enjoy the outstanding natural environments of the Otago lakes has placed significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. At the same time the economy of the Otago lakes area is heavily dependent on tourism. For example in 2020, tourism employment accounted for an estimated 56% (or 17,758) of the jobs in the Queenstown-Lakes district; tourism GDP accounted for 43.7% (or NZ \$1.7 billion) of the district’s GDP and international tourism contributed 64% (or NZ \$1.89 billion). The Otago-Lakes area also supplies significant renewable <u>energy electricity generation</u> for use in Otago and beyond.</p> <p>Impact snapshot</p> <p>Environmental</p>
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						<p>...</p> <p>Recreation use impacts on the environment can be a risk, for example the distribution of pest species can be accelerated as has occurred for lake snow and Lagarosiphon weeds being spread by recreation boating movements. Natural features and landscape values are also <u>can be</u> adversely impacted by tourism and urban growth, and energy production.</p> <p>Economic</p> <p>The economic benefits of urban development, tourism, agriculture <u>primary production, energy production-renewable electricity generation</u> and water supply can be positive for the Otago-Lakes' communities and visitors. It also impacts on the region's natural assets with a growing cost to the region that puts at risk the environment highly prized by residents and visitors. There are also impacts between industry sectors. <u>Renewable electricity generation provides a significant opportunity for local and regional business to compete sustainably on national and global markets and to attract, and maintain, tourism.</u></p> <p>...</p> <p>Social</p> <p>...</p>
FPI024	DairyNZ Limited	FPI024.012	SRMR – Significant resource management issues for the region	SRMR-I9	Amend	<p>Amend the issues to include both negative and positive aspects of resource use in the Impact snapshots, including the important, positive contribution of primary industries to the Otago economy and the importance of reliable access to water for primary production.</p> <p>Address identified knowledge gaps in methods and monitoring.</p>
FPI007	John Highton	FPI007.003	SRMR - Significant resource management issues for the region	SRMR-I9	Amend	<p>Add recognition of the role of power generation in affecting our current lakes and its potential to have further major effects in Otago in future</p>
FPI007	John Highton	FPI007.020	SRMR - Significant resource management issues for the region	SRMR-I9	Amend	<p>Amend to include sections dealing with camping and boats in the proposed RPS. I am interested in keeping camping in sites designed for camping. I would like to see more control of boats.</p>

RMIA – Resource management issues of significance to iwi authorities in the region

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI042	Ngāi Tahu ki Murihiku	FPI042.005	RMIA - Resource management issues of significance to iwi authorities in the region	General submission	Support	Retain the content of this chapter, subject to the amendments in the submission.
FPI037	Fish & Game	FPI037.010	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I1	Support	Retain as notified
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.013	RMIA – Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I1	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.013	RMIA – Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I1	Support	Retain the issue statements as statements of the relevant issues for Kāi Tahu ki Otago as notified
FPI030	Kāi Tahu ki Otago	FPI030.013	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I1	Support	Retain as notified
FPI044	Director General of Conservation	FPI044.003	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I1	Support	Retain as notified, subject to any changes sought by Ngāi Tahu papatipu rūnaka.
FPI024	DairyNZ Limited	FPI024.013	RMIA – Resource management issues of significance to iwi	RMIA-WAI-I1	Oppose	Incorporate part of content into RMIA-WAI-I3 and delete I1.

			authorities in the region			
FPI023	Moutere Station Ltd	FPI023.006	RMIA – Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I1	Amend	<p>Make the following amendments to RMIA-WAI-I1 – The loss and degradation of water resources through drainage, abstraction, pollution, and damming has resulted in material and cultural deprivation for Kāi Tahu ki Otago (<i>inferred</i>)</p> <p>The drainage of wetlands, water abstraction, degraded water quality, barriers to fish passage and changes to flow regimes as a result of damming have had significant negative impacts on Kāi Tahu <u>in the following areas [list the areas of concern for Kāi Tahu].</u> These activities <u>may</u> degrade the mauri of the water and the habitats and species it supports, therefore also degrading mahika kai and taoka species and places. These changes to the environment have meant that Kāi Tahu have had to adapt and change their use of the environment. As traditional mahika kai places and species have declined, mahika kai must now be carried out in artificial habitats such as reservoirs, and 49 hanau have had to switch to exotic species such as trout and salmon. The mātauraka associated with traditional mahika kai species and places cannot be passed on, and the intergenerational transfer of knowledge that has occurred for over 800 years is broken. Place names that carry tribal history are no longer reflective of their places – for example no one would now claim that the Waiareka is ‘sweet water’ to drink. <u>However, in some areas, multi-generational farmers have strengthened the traditional mahika kai species and farm in a manner that respects Ki Uta Ki Kai. Discretion is needed to ensure that work performed to protect indigenous species is not decimated by lumping all farms together and imposing blanket rules. The landowners must be in charge of the decisions that are made on their land, within a rational and clear policy framework.</u></p>
FPI037	Fish & Game	FPI037.011	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I3	Support	Retain as notified
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.014	RMIA – Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I3	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.014	RMIA – Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I3	Support	Retain the issue statements as statements of the relevant issues for Kāi Tahu ki Otago as notified
FPI030	Kāi Tahu ki Otago	FPI030.014	RMIA - Resource management issues of significance to iwi	RMIA-WAI-I3	Support	<p>Amend as follows:</p> <p>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</u> and of mana. Mahika kai continues to be degraded through the effects of land and water use activities on freshwater habitats.</p>

			authorities in the region			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. <u>Inadequate regulation of commercial fishing of tuna (eels) and inaka (whitebait) has also exacerbated the impacts of degradation and loss of habitat from land and water use activities on remaining populations of these species.</u>
FPI044	Director General of Conservation	FPI044.004	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I3	Support	Retain as notified, subject to any changes sought by Ngāi Tahu papatipu rūnaka.
FPI024	DairyNZ Limited	FPI024.014	RMIA – Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I3	Amend	Part of RMA-WAI-I1 can be added to this description of issues.
FPI007	John Highton	FPI007.004	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I3	Amend	The RPS document should also recognise in a separate section the cultural importance of being able to gather healthy food from a healthy environment for the general community. This includes things like whitebaiting, fishing for trout and salmon and hunting. It follows that the document should also recognise and plan for the importance of maintaining the environment for valued introduced species of game fish and game birds. This is currently a major oversight in this RPS. New sections should be created recognising the status of game fish and birds and the requirement to maintain a healthy environment for them.
FPI042	Ngāi Tahu ki Murihiku	FPI042.006	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I3	Amend	Amend the final sentence of the second paragraph, as follows: “It represents a <u>significant loss for mana whenua and a diminishing of raketirataka</u> and of mana.”
FPI005	Manuherikia Catchment Group (Incorporated Society)	FPI005.006	RMIA – Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I5	Amend	(7)(b)(i): The Kai Tahu values and practices that are to be supported need to be stated in this vision statement. (7)(b)(ii): Remove ‘ <i>Innovative</i> ’ Remove ‘ <i>food production</i> ’ and add innovative: to support “ <i>innovative land use</i> ’ in the area

LF – Land and freshwater

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI044	Director General of Conservation	FPI044.024	LF - Land and freshwater	General submission	Support	Retain as notified, except where specific charges are requested elsewhere in the submission.
FPI042	Ngāi Tahu ki Murihiku	FPI042.007	LF - Land and freshwater	General submission	Support	Retain the content of this chapter, subject to the amendments outlined below, and consistent with amendments recommended within the submission of Aukaha Limited on behalf of Kāi Tahu ki Otago and the submission of Te Rūnanga o Ngāi Tahu.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.013	LF - Land and freshwater	General submission	Amend	<p>Oppose the entire LF Chapter. Overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission, in summary:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. • Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).

LF-WAI – Te Mana o te Wai

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI037	Fish & Game	FPI037.058	LF-WAI - Te Mana o te Wai	General submission	Amend	Retain, subject to relief sought
FPI001	Dunedin City Council	FPI001.005	LF-WAI - Te Mana o te Wai	General submission	Amend	Consider amending the pORPS to align the Coastal Environment chapter more closely with the LF-WAI section if/where appropriate. The DCC submits that the aspects of LF-WAI that are relevant to the coastal environment / coastal waters should be clearly articulated in the Coastal Environment chapter to provide clarity.
FPI045	Forest & Bird	FPI045.005	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified
FPI046	QLDC	FPI046.003	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified
FPI001	Dunedin City Council	FPI001.006	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified.
FPI022	Manawa Energy Ltd	FPI022.003	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified
FPI007	John Highton	FPI007.005	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified
FPI021	Ballance Agri-Nutrients Ltd	FPI021.001	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified.
FPI035	Wise Response Society	FPI035.001	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Support	Retain as notified
FPI037	Fish & Game	FPI037.012	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	(4) water and land have a connectedness that supports and perpetuates life, and ... (6) <u>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> (7) <u>all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.</u>
FPI038	NZSki Ltd	FPI038.007	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	The mauri of Otago's water bodies and their health and well-being is protected <u>maintained</u> , and restored where it is degraded, and the management of land and water recognises and reflects that...
FPI039	Realnz	FPI039.009	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	The mauri of Otago's water bodies and their health and well-being is protected <u>maintained</u> , and restored where it is degraded, and the management of land and water recognises and reflects that...

FPI043	OWRUG	FPI043.051	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	The mauri health and wellbeing of Otago's water bodies and their health and well-being is protected, and restored improved where it is degraded, and the management of land and water recognises and reflects that: <u>(1) Protecting the health of water protects the wider environment and the mauri of water; ...</u>
FPI026	Federated Farmers of New Zealand	FPI026.018	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	Amend objective LF-WAI-O1 as follows: The mauri of Otago's significant and highly- valued natural resources are identified and protected, or enhanced where water bodies and their health and well-being is protected, and restored where it is degraded, and the management of land and water recognises and reflects that restores the balance between water, the wider environment, and the community, by recognising that: <i>(1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa,</i> <i>(2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future,</i> <i>(3) each water body has a unique whakapapa and characteristics,</i> <i>(4) water and land have a connectedness that supports and perpetuates life, and</i> <i>Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports</i>
FPI019	Fonterra Co-operative Group Ltd	FPI019.003	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	Amend the objective as follows: The mauri of Otago's water bodies and their health and well-being is protected, and restored improved where it is degraded, and the management of land and water recognises and reflects that: <i>(1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa,</i> <i>(2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future,</i> <i>(3) each water body has a unique whakapapa and characteristics,</i> <i>(4) <u>fresh water, and land and coastal water</u> have a connectedness that supports and perpetuates life, and</i> <i><u>(4A) protecting the health and well-being of water protects the wider environment and the mauri of water,</u></i> <i>(5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports. <u>And</u></i> <i><u>(6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water</u></i>
FPI033	Fulton Hogan Ltd	FPI033.001	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	Provide a comprehensive suite of policies in the LF-Land and Freshwater chapter that addresses "...how Te Mana o te Wai applies to water bodies and freshwater ecosystems

						<p><i>in the region</i>¹ including the activities that sit under each priority level and how the potential tensions between these activities are to be resolved.</p> <p>Part 3 of the NPSFM places the responsibility for this task on regional councils and it is best addressed within the FPI PROPS to provide clarity for lower order documents.</p> <p>¹ Part 3.2 of the NPSFM 2020.</p>
FPI020	Silver Fern Farms Ltd	FPI020.010	LF-WAI - Te Mana o te Wai	LF-WAI-01	Amend	<p>Amend as follows:</p> <p>LF-WAI-01 – Te Mana o te Wai The mauri of Otago’s water bodies and their health and well-being is protected, and <u>restoration is promoted</u> where it is degraded, and the management of land and water recognises and reflects that:</p>
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.014	LF-WAI - Te Mana o te Wai	LF-WAI-01	Amend	<p>Amend as follows:</p> <p>The mauri of Otago’s water bodies and their health and well-being is protected, and restored where it is degraded, and the management of land and water recognises and reflects that:</p> <p>...</p> <p>(4) <u>freshwater, and land and coastal waters</u> have a connectedness that supports and perpetuates life, and</p> <p>Add further clause as follows:</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>
FPI027	Contact Energy Limited	FPI027.015	LF-WAI - Te Mana o te Wai	LF-WAI-01	Amend	<p>Contact seeks amendments to ensure that the objective gives effect to the NPSFM; and to ensure that it is more appropriately drafted as an objective, rather than a list of policies.</p> <p>By way of an example, Contact proposes the following amendments (using the background document version as the base text):</p> <p>LF-WAI-01 – Te Mana o te Wai</p> <p>The mauri of Otago’s water bodies and their health and well-being is protected, and <u>the balance between the water, the wider environment, and the community is restored and preserved, improved where it is degraded, and the management of land and water recognises and reflects that:</u></p> <p>(1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa,</p> <p>(2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future,</p> <p>(3) each water body has a unique whakapapa and characteristics,</p>

						<p>(4) freshwater, and land and coastal water have a connectedness that supports and perpetuates life, and</p> <p>(4A) protecting the health and well-being of water protects the wider environment and the mauri of water,</p> <p>(5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports and</p> <p>(6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.</p>
FPI024	DairyNZ Limited	FPI024.015	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	<p>Amend LF-WAI-O1 as follows:</p> <p>The mauri of <u>The health and well-being of Otago’s water bodies</u> and their health and wellbeing is <u>are</u> protected, and restored where it is degraded, and the management of land and water recognises and reflects that:</p> <p>(1) water is the foundation and source of all life</p> <p>– na te wai ko te hauora o ngā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, <u>connecting the past, present and future,</u></p> <p>(3) each water body has a unique whakapapa and characteristics,</p> <p>(4) water and land have a connectedness that supports and perpetuates life, and Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports.</p>
FPI030	Kāi Tahu ki Otago	FPI030.015	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	<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><i>(1) <u>freshwater, and land and coastal waters</u> have a connectedness that supports and perpetuates life ...</i> Add further clause to read:</p> <p><i><u>(6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.</u></i></p>
FPI016	Meridian Energy Ltd	FPI016.010	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	<p>Amend LF-WAI-O1 by adding the following bullet:</p> <p><i>(6) Freshwater management and hydro-electricity generation is part of New Zealand’s integrated response to climate change</i></p>
FPI031	Oceana Gold Ltd	FPI031.003	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	<p>“The mauri of Otago’s water bodies and their health and well-being is protected, and restored <u>improved</u> where it is degraded ...”</p>
FPI044	Director General of Conservation	FPI044.005	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	<p>Amend Clause (1) as follows, or words to like effect:</p> <p>“ ... (1) <u>freshwater, and land and coastal waters</u> have a connectedness that supports and perpetuates life ...</p> <p>AND insert a new clause as follows or words to like effect:</p>

						<u>“(6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.”</u>
FPI042	Ngāi Tahu ki Murihiku	FPI042.008	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	Amend LF-WAI-O1, as follows: “... Water, land and coastal waters have a connectedness that supports and perpetuates life...”
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.014	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	Oppose the entire LF Chapter. As per 2021 Submission Point 24, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission, in summary: <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. • Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).
FPI009	Central Otago Winegrowers Association	FPI009.003	LF-WAI - Te Mana o te Wai	LF-WAI-O1	Amend	Amend LF-WAI-O1 as follows The health and wellbeing mauri of Otago’s water bodies and their health and well-being is protected, and improved restored where it is degraded, and the management of land and water recognises and reflects that:
FPI020	Silver Fern Farms Ltd	FPI020.011	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.015	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Support	Retain as notified.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.023	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Support	Retain as notified.
FPI007	John Highton	FPI007.006	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Support	Retain as notified
FPI035	Wise Response Society	FPI035.002	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Support	Retain as notified
FPI037	Fish & Game	FPI037.013	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	(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...
FPI043	OWRUG	FPI043.052	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	(1) first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these, (2) second, the health and well-being needs of people, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested resources, immersive activities including harvesting resources and bathing), and ...
FPI045	Forest & Bird	FPI045.006	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	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 <u>harvested from the waterbody</u>) and immersive activities (such as harvesting resources and bathing), and 3) third, the ability of people and communities to provide for their social, economic, and cultural well- being, now and in the future, <u>including hydroelectricity generation.</u>
FPI026	Federated Farmers of New Zealand	FPI026.019	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend LF-WAI-P1 as follows: <i>In all management of fresh water in Otago, prioritise:</i> (1) <i>first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these,⁴⁷</i> (2) <i>second, the health and well-being needs of people and essential needs of animals, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested resources) and immersive activities (such as harvesting resources and bathing), and</i> <i>the ability of people and communities to provide for their social, economic, and cultural well- being, now and in the future.</i>
FPI019	Fonterra Co-operative Group Ltd	FPI019.004	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend as the policy follows: <i>In all management of decision-making affecting fresh water in Otago, prioritise:</i> (1) <i>first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these,</i> (2) <i>second, the health and well-being needs of people and essential needs of animals, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested resources) and immersive activities (such as harvesting resources and bathing), and</i> <i>third, the ability of people and communities to provide for their social, economic, and cultural well – being, now and in the future.</i>

FPI001	Dunedin City Council	FPI001.007	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Consider providing clarification or adding a new policy on the priorities when there is conflict between them e.g. housing development and water needed for drinking water with potential effects on the health and well-being of a water body.
FPI027	Contact Energy Limited	FPI027.016	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	<p>Contact seeks that the policy is amended to address Contact's concerns. By way of example only, Contact proposes the following amendments (using the background document version as the base text):</p> <p>LF-WAI-P1 – Prioritisation</p> <p>In all management of <u>decision-making affecting</u> fresh water in Otago, prioritise:</p> <ol style="list-style-type: none"> (1) first, the health and well-being of water bodies, freshwater ecosystems, <u>including their protection from (through emission reduction), and resilience to climate change, and te hauora o te wai, and the connections with te hauora o te taiao, and as well as the exercise of mana whenua to uphold these and provide for te hauora o te taiao,</u> (2) second, the health and well-being needs of people, <u>(te hauora o te takata), including through tangata, interacting and their interactions with water through ingestion (such as drinking water and consuming harvested resources harvested from the water body), and immersive activities (such as harvesting resources and bathing primary contact) and providing for renewable electricity generation, and</u> (3) third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future.
FPI027	Contact Energy Limited	FPI027.017	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	<p>By way of example only, Contact proposes the following amendment (using the background document version as the base text):</p> <p>LF-WAI-PR1 – Principal reasons</p> <p>In accordance with the NPSFM, councils are required to implement a framework for managing freshwater that gives effect to Te Mana o te Wai. This places the mauri (life-force) of the water at the forefront of decision making, recognising <u>that te hauora o te wai (the health of the water) is the first priority, and supports te hauora o te taiao (the health of the environment) and te hauora o te takata (the health of the people). It is only after the health of the water and the health of the people is sustained that water can be used for economic purposes. Giving effect to Te Mana o te Wai requires actively involving takata mana whenua in freshwater planning and management.</u></p>
FPI024	DairyNZ Limited	FPI024.016	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	<p>Amend the policy as follows:</p> <p>In all management of fresh water in Otago, prioritise:</p> <ol style="list-style-type: none"> (1) first, the health and well-being of water bodies and freshwater ecosystems, <u>te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these,</u>

						(2) second, the health and well-being needs of people, te hauora o te tangata; interacting with water through ingestion (such as drinking water) and consuming harvested resources and immersive activities (such as harvesting resources and bathing), and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
FPI030	Kāi Tahu ki Otago	FPI030.016	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend as follows: <i>In all management of fresh water in Otago, prioritise:</i> <i>(1) 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> <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 harvested resources harvested from the water body) and immersive activities (such as harvesting resources and bathing), and ...</i>
FPI022	Manawa Energy Ltd	FPI022.004	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend clause (2) as follows: (2) second, the health and well-being needs of people, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested resources) and immersive activities (such as harvesting resources and bathing), and through the use of water for renewable electricity generation , and
FPI016	Meridian Energy Ltd	FPI016.011	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend LF-WAI-P1 as follows: <i>In all management of Manage fresh water in Otago by:</i> <i>(1) prioritise prioritising:</i> <i>(1a) first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these,</i> <i>(2b) second, the health and well-being needs of people, te hauora o te tangata, interacting with water through ingestion (such as drinking water and consuming harvested resources) and immersive activities (such as harvesting resources and bathing), and</i> <i>(3c) third, the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future</i> <i>(2) <u>Recognising and providing for freshwater management and hydro-electricity generation as part of New Zealand's integrated response to climate change.</u></i>
FPI012	Minister For the Environment	FPI012.003	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend LF –WAI–P1 – Prioritisation to “ <i>in all decision-making affecting freshwater</i>

FPI031	Oceana Gold Ltd	FPI031.004	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	policy should be amended to provide clarity on priorities where there is a conflict between them e.g. housing development and water needed for drinking water with potential effects on the health and well-being of a water body.
FPI017	Ravensdown Ltd	FPI017.004	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend Policy LF-Wai-P1 In all management <u>of decision-making affecting</u> fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies, and freshwater ecosystems, te hauora o te wai, <u>and the connections te hauora o te taiao</u> , and the exercise of mana whenua to uphold these, (2) second, the health and well-being needs of people, (te hauora o te tangata takata); <u>interacting with water through ingestion (such as drinking water and consuming harvested resources harvested from the water body) and immersive activities (such as harvesting resources and bathing primary contact)</u> , and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
FPI044	Director General of Conservation	FPI044.006	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Retain as notified, except that if IM-P1 does not reflect the same three-level prioritisation then insert a new clause as follows or words to like effect: <u>“(4) if there is a conflict between this policy and other provisions in this RPS that cannot be resolved by the application of higher order documents, then this policy takes precedence over Policy IM-P1.”</u>
FPI047	Horticulture New Zealand	FPI047.013	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	“(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), <u>essential human health (such as food security and drinking water)</u> and immersive activities (such as harvesting resources and bathing), an
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.015	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Oppose the entire LF Chapter. As per 2021 Submission Point 24, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission, in summary: <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. • Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).

FPI021	Ballance Agri-Nutrients Ltd	FPI021.002	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend LF-WAI-P1 – Prioritisation as follows: LF-WAI-P1-Prioritisation <i>In all management decision making affecting of fresh water in Otago, prioritise:</i> <i>(1) first, the health and well-being of water bodies and freshwater ecosystems, te hauora o tew ai and <u>the connections with te hauora o te taiao, and together with-</u></i> <i>the exercise of mana whenua to uphold these,</i> ...
FPI009	Central Otago Winegrowers Association	FPI009.004	LF-WAI - Te Mana o te Wai	LF-WAI-P1	Amend	Amend LF-WAI-P1 to reflect the Objective of the NPSFM.
FPI043	OWRUG	FPI043.057	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	In accordance with the NPSFM, councils are required to implement a framework for managing freshwater that gives effect to Te Mana o te Wai. This places the mauri (life-force) of the water at the forefront of decision making, recognising te hauora o te wai (the health of the water at the forefront of decision making so that it may <u>is the first priority, and support te hauora o te taiao</u> (the health of the environment and te hauora o te takata (the health of the people .It is only after the health of the water is sustained that water can be used for economic purposes. ...
FPI026	Federated Farmers of New Zealand	FPI026.020	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend LF-WAI-PR1 to be consistent with the NPSFM.
FPI006	Wendy Gunn	FPI006.001	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Reads " It is only after the health of the water is sustained that water can be used for economic purposes." Amend to " Sustain the health of the water before considering it's use for economic purposes. Once used for economic purposes, the health of the water must be monitored and sustained."
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.016	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend as follows: Paragraph 1, last sentence: ... Giving effect to Te Mana o te Wai requires actively involving takata <u>mana</u> whenua in freshwater planning and management. (and other consequential amendments where this issue arises again)
FPI024	DairyNZ Limited	FPI024.017	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend the principal reason as follows: In accordance with the NPSFM, councils are required to implement a framework for managing freshwater that gives effect to Te Mana o te Wai. This places the mauri (life force) of the water at the forefront of decision making, recognising te hauora o te wai (the health of the water) is the first priority, at the forefront of decision-making so that it may and supports te hauora o te taiao (<u>support</u> the health of the environment) and te hauora o te takata (the health of the people). It is only after the health of the water is sustained that water can be used for economic purposes. Giving effect to Te Mana o te Wai requires actively involving takata whenua in freshwater planning and management.

FPI030	Kāi Tahu ki Otago	FPI030.017	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend as follows: Paragraph 1, 2 nd sentence: <i>... This places the mauri (life-force) of the water at the forefront of decision making, recognising <u>that te hauora o te wai (the health of the water) is the first priority ...</u></i> Paragraph 1, last sentence: <i>... Giving effect to Te Mana o te Wai requires actively involving takata <u>mana</u> whenua in freshwater planning and management.</i>
FPI016	Meridian Energy Ltd	FPI016.012	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend LW-WAI-PR1 by adding the following paragraph: <i>At the same time as implementing a Te Mana of te Wai framework, councils are required to manage freshwater as part of New Zealand's integrated response to climate change and to recognise and provide for the national significance of renewable electricity generation activities,</i>
FPI047	Horticulture New Zealand	FPI047.014	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend LF-WAI-PR1 as follows: <i>"It is only after the health of the water is sustained, <u>and the essential human health of people is provided for</u>, that water can be used <u>for wider social, cultural and</u> economic purposes.</i>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.016	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend the wording of Principal Reasons LF-WAI-R1 to accurately reflect the wording of Part 1.3 (1), (2), (3) and (4) of the NPS-FM and include discussion of integrated management of freshwater resources (ki uta ki tai).
FPI009	Central Otago Winegrowers Association	FPI009.005	LF-WAI - Te Mana o te Wai	LF-WAI-PR1	Amend	Amend LF-WAI-PR1 – Principal reasons In accordance with the NPSFM, councils are required to implement a framework for managing <i>freshwater</i> that gives effect to <i>Te Mana o te Wai</i> . This places the mauri (life-force) of the water at the forefront of decision making, recognising te hauora o te wai (the health of the water) is the first priority, and supports te hauora o te taiao (the health of the environment) and te hauora o te takata (the health of the people). It is only after the health of the water is sustained that water can be used for economic purposes. Giving effect to <i>Te Mana o te Wai</i> requires actively involving <i>takata whenua</i> in <i>freshwater</i> planning and management.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.017	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.018	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Support	Retain as notified.
FPI043	OWRUG	FPI043.058	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	The mauri of Otago's water bodies and their health and well-being <u>of Otago's water bodies is protected.</u>
FPI045	Forest & Bird	FPI045.007	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	The mauri of Otago's water bodies and their health and well-being is protected <u>and restored where degraded</u>
FPI026	Federated Farmers of New Zealand	FPI026.021	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	Amend to provide clarity

FPI019	Fonterra Co-operative Group Ltd	FPI019.005	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	Delete proposed L-WAI-AER2 and replace as follows: <i><u>The health and well-being of the environment and people is protected because the health and wellbeing of Otago's water bodies and their ecosystems are protected and, where degraded, improved.</u></i>
FPI027	Contact Energy Limited	FPI027.018	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	Contact seeks amendments to reflect the approach to LF-WAI-P1 referred to above.
FPI024	DairyNZ Limited	FPI024.018	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	Amend the wording as follows: The mauri of Otago's water bodies and their health and well-being is protected. Other consequential changes might be needed depending on changes to LF-WAI-O1 – Te Mana o te Wai.
FPI042	Ngāi Tahu ki Murihiku	FPI042.009	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	Consider changing the order of LF-WAI-AER1 and LF-WAI-AER2 to reflect prioritisation of the mauri of waterbodies. Amend as follows: "The mauri of Otago's water bodies and their health and well-being is protected, <u>and restored where degraded, benefitting people, kā takata katoa.</u> "
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.017	LF-WAI - Te Mana o te Wai	LF-WAI-AER2	Amend	Oppose the entire LF Chapter. As per 2021 Submission Point 24, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission, in summary: <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the 'other' by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago's soil and water resources before redrafting the LF chapter. Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).

LF-VM – Visions and management

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI037	Fish & Game	FPI037.059	LF-VM - Visions and management	General submission	Amend	Retain, subject to relief sought
FPI037	Fish & Game	FPI037.060	LF-VM - Visions and management	General submission	Amend	Fish and Game also seeks relief to resolve drafting issues within the vision objectives
FPI037	Fish & Game	FPI037.061	LF-VM - Visions and management	General submission	Amend	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.
FPI043	OWRUG	FPI043.104	LF-VM - Visions and management	General submission	Amend	the LF-VM- Visions and Management section of the RPS not be adopted without the inclusion of goals that have been subject to a cost/benefit analysis that demonstrates that they are achievable by those who will be tasked to make whatever changes are required to implement the visions.
FPI033	Fulton Hogan Ltd	FPI033.002	LF-VM - Visions and management	General submission	Amend	Delete the phrase “fresh water is managed in accordance with the LF–WAI objectives and policies” from the FMU visions unless a comprehensive set of policies addressing “...how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region” is included amongst the LF–WAI objectives and policies.
FPI023	Moutere Station Ltd	FPI023.007	LF-VM - Visions and management	General submission	Amend	The Visions and management across all FMU/Rohe’s is amended to align with the National Policy Statement which identifies that irrigation, cultivation and food and fibre production is a mandatory value for consideration
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.018	LF-VM - Visions and management	General submission	Amend	In partnership with mana whenua, prepare a new <u>overarching region-wide vision</u> and consequential amendments to the visions to only highlight differences from that region-wide vision. Amend visions to require practices to change within 10 years and visions to be achieved within 20 years.
FPI030	Kāi Tahu ki Otago	FPI030.019	LF-VM - Visions and management	General submission	Amend	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 OR Amend the objectives to remove unnecessary inconsistencies and to ensure that the vision for each FMU addresses the outcomes below: <ul style="list-style-type: none"> • Kāi Tahu relationship with wāhi tūpuna • Kāi Tahu ability to access and use water bodies to maintain their connection with the wai

						<ul style="list-style-type: none"> • The health and abundance of mahika kai • The health of ecosystems and indigenous species • The health of wetlands, estuaries and lagoons, and downstream coastal waters • The ability for indigenous species to migrate easily • Sustaining the natural form and function of the water bodies • Sustainable land and water management practices • Ceasing direct discharges of wastewater to water bodies.
FPI029	Otago Regional Council	FPI029.001	LF-VM - Visions and management	General submission	Amend	<p>The freshwater visions for the Catlins FMU and Upper Lakes rohe are anticipated to be achieved by 2030. Current modelling for periphyton show that meeting the draft target attribute states by 2030 is unlikely. If on ground mitigations, in addition to those included in the GMP and GMP + scenarios, are included in the pLWRP, then the visions are potentially still appropriate. Mitigations could be identified through other activities such as community consultation.</p> <p>As modelling inputs are refined, future modelling results may show the visions are still appropriate</p>
FPI044	Director General of Conservation	FPI044.007	LF-VM - Visions and management	General submission	Amend	<p>Amend all freshwater visions to:</p> <ul style="list-style-type: none"> - provide a consistent and clear structure across and between each FMU / rohe (which could include an over-arching vision or visions), - appropriately recognise the relevant values and issues in every FMU / rohe, - provide appropriate timeframes and staged targets, and <p>in addition, incorporate further specific relief as set out below</p>
FPI035	Wise Response Society	FPI035.003	LF-VM - Visions and management	New provision	Amend	<p>Immediately after the heading Objectives insert <u>These FMU and Rohe visions are in addition to meeting all other provisions in this statement and cannot be weaker than a national standard or provision</u></p>
FPI037	Fish & Game	FPI037.014	LF-VM - Visions and management	New provision	Amend	<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> <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>(7) Consequential relief to remove parts of LF-VM-O2 to LF-VM-O6 that duplicate direction in LF-VM-AO2.</p>
FPI045	Forest & Bird	FPI045.008	LF-VM - Visions and management	New provision	Amend	<p>Add a new overarching vision to apply to all FMUs in Otago as follows:</p> <p><u>LF-VM-O1 – All of Otago catchment vision</u></p> <p><u>By no later than 2040, in all Otago catchments:</u></p> <p><u>(1) water bodies are protected at, or restored 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) kai/food is available to be harvested from water bodies in abundance and is safe to consume,</u></p> <p><u>(8) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies,</u></p> <p><u>(9) there are no direct discharges of untreated wastewater to water bodies, and</u></p> <p><u>(10) freshwater is managed in accordance with the LF-WAI objectives and policies.</u></p> <p>Make the required consequential amendments to specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining</p>

						FMU specific provisions and timeframes where these are more stringent than what is provided for in LF-VM-O1
FPI046	QLDC	FPI046.004	LF-VM - Visions and management	LF-VM-O2	Support	Retain as notified
FPI005	Manuherikia Catchment Group (Incorporated Society)	FPI005.001	LF-VM - Visions and management	LF-VM-O2	Support	Retain LF VM (1) (a), (1)(b), (2) to (6) as notified
FPI041	McArthur Ridge Vineyard Ltd	FPI041.002	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF-VM-O2(7)(b) as follows: (b) in the Dunstan, Manuherikia and Roxburgh rohe: (i).. (ii) innovative and sustainable land and water management practices support food agricultural, pastoral, horticultural and viticultural production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact...
FPI041	McArthur Ridge Vineyard Ltd	FPI041.003	LF-VM - Visions and management	LF-VM-O2	Amend	Amend the date in LF-VM-O2(8)(c) by which the outcomes are to be achieved: ... (c) by 2050 2035 in the Manuherikia rohe.
FPI035	Wise Response Society	FPI035.005	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF-VM-O2(7) as follows: (a) in the Upper Lakes rohe, the high-quality waters of the lakes and their tributaries are protected and <u>restored</u> , recognising the significance of the purity of these waters to Kāi Tahu and to the wider community, (b) in the Dunstan, Manuherikia and Roxburgh rohe: (i) <u>environmental flow regimes</u> 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 <u>in accordance with Te Mana o te Wai</u> , and (c) in the Lower Clutha rohe: (i) there is no further modification of the shape and behaviour of the water bodies and opportunities to restore the natural form and function of water bodies are promoted wherever possible , (ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible , restored, (iii) land management practices reduce <u>inputs and</u> discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and (iv) there are no direct discharges of wastewater to water bodies, and (8) the outcomes sought in (7) are to be achieved within the following timeframes: (a) by 2030 in the Upper Lakes rohe, (b) by 2045 2035 in the Dunstan, Roxburgh and Lower Clutha rohe, and (c) by 2050 2035 in the Manuherikia rohe <u>and to all incorporate and report on 5 yearly milestones.</u>
FPI038	NZSki Ltd	FPI038.008	LF-VM - Visions and management	LF-VM-O2	Amend	In the Clutha Mata-au FMU: <u>(1) Water bodies support human wellbeing through thriving outdoor recreation opportunities, including access to waterbodies and use of water for outdoor recreation activities</u>

FPI039	Realnz	FPI039.010	LF-VM - Visions and management	LF-VM-O2	Amend	In the Clutha Mata-au FMU: <u>(1) Water bodies support human wellbeing through thriving outdoor recreation opportunities, including access to waterbodies and use of water for outdoor recreation activities</u>
FPI043	OWRUG	FPI043.001	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF-VM-O2 Clutha Mata-Au FMU to include only such goals that are sufficiently clear to enable them to be subject to a cost-benefit analysis that demonstrates that they meet the requirements of cl 3.3 of the NPS FM2020. Amend the timeframes in (8) to include only such timeframes as can be shown to be achievable. <u>Water is allocated to the food and fibre sector support sustainable production and the sectors contribution to social and economic wellbeing of the community</u> (8) in addition to (1) to (67) above: (ii) innovative and sustainable land and water management practices support food production <u>the food and fibre sector</u> in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and (iii) sustainable abstraction <u>consistent with NOF values</u> occurs from main stems or groundwater in preference to tributaries <u>where practicable</u> ., <u>(iv) the role of water storage is recognised as being fundamental to the food and fibre sector, and an essential part of meeting the vision as set out in (1) to (7) above.</u> ... (ii) the ecosystem connections between freshwater, wetlands and the coastal environment are <u>protected</u> preserved and, wherever possible, restored ... (9) the outcomes sought in (78) are to be achieved within the following timeframes:
FPI045	Forest & Bird	FPI045.009	LF-VM - Visions and management	LF-VM-O2	Amend	Make the required consequential amendments to specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these are more stringent than what is provided for in LF-VM-O1
FPI026	Federated Farmers of New Zealand	FPI026.022	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF-VM-O2 as follows (or similar) In the Clutha Mata-au FMU: (1) management of the FMU recognises that: (a) the Clutha Mata-au is a single connected system ki uta ki tai, and (b) the source of the wai is pure, coming directly from Tawhirimatea to the top of the mauka and into the awa, (2) fresh water is managed in accordance with the LF-WAI objectives and policies,

						<p>(3) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained,</p> <p>(4) water bodies support thriving mahika kāi and Kāi Tahu whānui have access to mahika kāi,</p> <p>(5) indigenous species migrate easily and as naturally as possible along and within the river system,</p> <p>(6) the national significance of the Clutha hydro-electricity generation scheme is recognised,</p> <p>(7) <u>Management that enables adaptation of communities alongside waterways in a changing climate.</u></p> <p>(8) <u>activities associated with the primary sector are recognised as having an important role in the FMU,</u></p> <p>(9) in addition to (1) to (6) above: 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>(b) in the Dunstan, Manuherekia and Roxburgh rohe:</p> <p>(i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and</p> <p>(ii) innovative and sustainable land and water management practices support food production <u>primary production</u> 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>(iii) sustainable abstraction <u>consistent with NOF values</u> occurs from main stems or groundwater in preference to tributaries,</p> <p>(c) in the Lower Clutha 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,</p> <p>(ii) the ecosystem connections between freshwater, wetlands and the coastal environment are <u>protected</u> preserved and, wherever possible, restored,</p> <p>(iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p> <p>(iv) there are no direct discharges of wastewater to water bodies, and</p>
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						<p>(9) the outcomes sought in (78) are to be achieved within the following <u>ambitious but achievable</u> timeframes <u>identified by the community</u>:</p> <p>(a) — by 2030 in the Upper Lakes rohe,</p> <p>(b) — by 2050 in the Dunstan, Roxburgh and Lower Clutha rohe, and by 2050 in the Manuherekia rohe.</p>
FPI019	Fonterra Co-operative Group Ltd	FPI019.006	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend the objective as follows:</p> <p>...</p> <p>(7) in addition to (1) to (6) above:</p> <p>...</p> <p>(c) in the Lower Clutha rohe:</p> <p>(iv) there are no direct discharges of wastewater <u>containing sewage</u> to water bodies, <u>there are no direct discharges of industrial and trade waste or grey water to water bodies unless no feasible alternative discharge option exists to better manage ecological and cultural effects on water quality.</u></p>
FPI023	Moutere Station Ltd	FPI023.008	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend LF-VM-O2 to:</p> <p>(5) <u>where required to complete their lifecycle</u> indigenous species migrate easily and as naturally as possible along and within the river system</p> <p>...</p> <p>(7)(b)</p> <p>(ii) Innovative and sustainable land and water management practices support food and <u>fibre</u> production in the area and...</p> <p>(iii) Sustainable abstraction occurs from main stems or groundwater in preference to tributaries <u>where practicable</u></p>
FPI020	Silver Fern Farms Ltd	FPI020.012	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend as follows:</p> <p>LF-VM-O2 – Clutha Mata-au FMU vision</p> <p>[...]</p> <p>(7) in addition to (1) to (6) above:</p> <p>[...]</p> <p>(c) in the Lower Clutha 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,</p> <p>(ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored,</p> <p>(iii) <u>innovative and sustainable land and water management practices support food production and land management practices reduce</u> discharges of nutrients and other contaminants to water bodies <u>are managed</u> so that <u>water bodies</u> are safe for human contact, and</p>

						<p>(iv) there are no direct discharges of sewage wastewater to water bodies, and</p> <p>(v) <u>there are no direct discharges of untreated greywater, industrial waste or trade waste to water.</u></p>
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.019	LF-VM - Visions and management	LF-VM-O2	Amend	Amend to provide an overarching <u>vision for Clutha Mata-au</u> and consequential amendments to only highlight differences between rohe.
FPI001	Dunedin City Council	FPI001.008	LF-VM - Visions and management	LF-VM-O2	Amend	Amend to include material about mitigation of sediment processes currently being obstructed by large dams.
FPI005	Manuherikia Catchment Group (Incorporated Society)	FPI005.002	LF-VM - Visions and management	LF-VM-O2	Amend	LF VM (7)(b)(i): The Kai Tahu values and practices that are to be supported need to be stated in this vision statement.
FPI005	Manuherikia Catchment Group (Incorporated Society)	FPI005.003	LF-VM - Visions and management	LF-VM-O2	Amend	LF VM (7)(b)(ii): Remove ‘Innovative’ Remove ‘food production’ and add innovative: to support “innovative land use’ in the area
FPI005	Manuherikia Catchment Group (Incorporated Society)	FPI005.004	LF-VM - Visions and management	LF-VM-O2	Oppose	LF VM (7)(b)(iii): Remove (iii)
FPI005	Manuherikia Catchment Group (Incorporated Society)	FPI005.005	LF-VM - Visions and management	LF-VM-O2	Amend	LF VM (8)(a); (8)(b); & (8)(c): Link timeframes to clear outcomes for the rohe
FPI027	Contact Energy Limited	FPI027.019	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Contact seeks amendments to address its concerns. By way of example only, Contact propose the following amendments (using the background document version as base text):</p> <p>In the Clutha Mata-au FMU:</p> <ol style="list-style-type: none"> (1) management of the FMU recognises that: <ol style="list-style-type: none"> (a) the Clutha Mata-au is a single connected system ki uta ki tai, and (b) the source of the wai is pure, coming directly from Tawhirimatea <u>Tāwhiritmātea</u> to the top of the mauka and into the awa, (2) fresh water is managed in accordance with the LF-WAI objectives and policies, (3) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained and <u>connections with wāhi tupuna are re-established where these have been degraded or lost, restored,</u> (4) water bodies support thriving mahika kai <u>mahika kai that are safe for consumption</u> and Kāi Tahu whānui have access to mahika kai <u>mahika kai,</u> (5) indigenous species migrate easily and as naturally as possible <u>practicable</u> along and within the river system, <p><u>(5A) the ecosystem connections between freshwater, wetlands, and the coastal environment are preserved and, wherever possible practicable, restored</u></p>

						<p><u>(5B) environmental flows and levels in water bodies sustain, and wherever possible practicable, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices,</u></p> <p><u>(5C) food production in the area is supported by innovative and sustainable land and water management practices that reduce discharges of nutrients and other contaminants to water bodies where required to ensure that they are safe for human contact,</u></p> <p><u>(5D) there are no direct discharges of wastewater containing sewage to water bodies,</u></p> <p><u>(6) the national significance of the ongoing operation, maintenance and upgrading of the Clutha hydro-electricity generation scheme, including its generation capacity, storage, and operational flexibility and its contribution to climate change mitigation is recognised, provided for, and protected,</u></p> <p><u>(7) in addition to (1) to (6) above:</u></p> <p><u>(a) in the Upper Lakes rohe, the high quality waters of the lakes and their tributaries are protected, and if degraded are improved, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community,</u></p> <p><u>(b) in the Dunstan, Manuherekia and Roxburgh rohe:</u></p> <p><u>(i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and</u></p> <p><u>(ii) innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</u></p> <p><u>(iii) sustainable abstraction occurs from main stems or groundwater in preference to tributaries,</u></p> <p><u>(c) in the Upper Lakes and Lower Clutha rohe:</u></p> <p><u>(i) there is no further minimise modification of the shape and behaviour of the water bodies and promote opportunities to restore the natural form and function of water bodies are promoted wherever possible practicable, and</u></p> <p><u>(ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored,</u></p> <p><u>(iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</u></p> <p><u>(iv) there are no direct discharges of wastewater to water bodies, and</u></p> <p><u>(8) the outcomes sought in (7) are to be achieved within the following timeframes:</u></p> <p><u>(a) by 2030 in the Upper Lakes rohe,</u></p> <p><u>(b) by 2045 in the Dunstan, Manuherekia, Roxburgh and Lower Clutha rohe, and</u></p> <p><u>by 2050 in the Manuherekia rohe.</u></p>
FPI024	DairyNZ Limited	FPI024.019	LF-VM - Visions and management	LF-VM-O2	Amend	Amend the timeframes in LF-VM O2-O6 based on a more thorough understanding of the implications, economic and social cost, on the community from meeting the long-term

						visions. As a starting point, a 50-year timeframe should be considered in FMUs where the visions will be more challenging to achieve.
FPI030	Kāi Tahu ki Otago	FPI030.020	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend as follows:</p> <p>In the Clutha Mata-au FMU:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) ...</p> <p>(4) ...</p> <p>(5) ...</p> <p>(6) <u>the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored,</u></p> <p>(7) <u>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>(8) <u>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>(9) <u>sustainable abstraction occurs from lakes, river main stems or groundwater in preference to tributaries,</u></p> <p><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> <p><u>(11) there are no direct discharges of wastewater to water bodies, and</u></p> <p><u>(12)(6) the national significance of the Clutha hydro-electricity generation scheme is recognised,</u></p> <p><u>(13)(7) in addition to (1) to (12)(6) above:</u></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, (b) in the Dunstan, Manuherekiā and Roxburgh rohe:</p> <p>(i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and</p> <p>(ii) innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p> <p>(iii) 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>(ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored,</p> <p>(iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p> <p>(iv) there are no direct discharges of wastewater to water bodies, and</p> <p>(14)(8) the outcomes sought in (7) are to be achieved within the following timeframes:</p> <p>by 2030 in the Upper Lakes rohe, and</p> <p>by 2045 in the Dunstan, Manuherekia, Roxburgh and Lower Clutha rohe, and</p> <p>by 2050 in the Manuherekia rohe.</p>
FPI012	Minister For the Environment	FPI012.004	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF-VM-O2 – Clutha Mata-au FMU vision to include a clear vision of the catchment that has phased out existing over-allocation and avoids future over-allocation.
FPI012	Minister For the Environment	FPI012.005	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF-VM-O2 – Clutha Mata-au FMU vision (timeframes) to include interim steps in a manner similar to the consultation version of the pRPS, although 2040 for quality and flows may still be longer than reasonable.
FPI018	Waka Kotahi	FPI018.001	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend Objective LF-VM-O2 as follows:</p> <p>“In the Clutha Mata-au FMU:</p> <p>....</p> <p>(7) in addition to (1) to (6) above:</p> <p>...</p> <p>(c) in the Lower Clutha Rohe:</p> <p>(i) minimise there is no further modification of the shape and behaviour of the water bodies and <u>promote</u> opportunities to restore the natural form and function of water bodies, are promoted wherever possible,</p>
FPI028	Waterfall Park Developments Ltd	FPI028.001	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend Objective LF-VM-O2 (7)(b) as follows:</p> <p>In the Clutha Mata-au FMU:</p> <p>...</p> <p>(7) in addition to (1) to (6) above:</p> <p>(a) ...</p> <p>(b) in the Dunstan, Manuherekia and Roxburgh rohe:</p> <p>...</p> <p>(ii) innovative and sustainable land and water management practices <u>improve water quality where degraded</u>, 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>...</p> <p>Plus any additional, alternative or consequential amendments as are considered appropriate to address the concerns and achieve the outcomes sought in the submission.</p>

FPI007	John Highton	FPI007.007	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF – VM – O2(5) to provide for the migration of valued introduced species such as salmon, and native species.
FPI007	John Highton	FPI007.008	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF – VM – O2(6) to recognise that hydro – electricity generators cause significant environmental degradation and include a provision with tighter regulations to manage the effects on the environment caused by hydro – electricity schemes.
FPI007	John Highton	FPI007.009	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF – VM – O2(7) to emphasise the need for reducing contaminants and discharges from land management practices
FPI007	John Highton	FPI007.010	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF – VM – O2(8) to 2030 for all timeframes
FPI017	Ravensdown Ltd	FPI017.005	LF-VM - Visions and management	LF-VM-O2	Amend	Amend Objective LF-VM-O2as follows: In the Clutha Mata-au FMU:... <u>(5C) food production in the area is supported by innovative and sustainable land and water management practices that reduce discharges of nutrients and other contaminants to water bodies where required to ensure that they are safe for human contact,</u> (1) in addition to (1) to (6) above: (b) in the Dunstan, Manuhereikia and Roxburgh rohe:... (iii) <u>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....</u> (c) in the Lower Clutha rohe:..., <u>land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</u>
FPI044	Director General of Conservation	FPI044.008	LF-VM - Visions and management	LF-VM-O2	Amend	Amend Clause 2 as follows or words to like effect: “(2) fresh water is managed in accordance with the LF-WAI objectives and policies, <u>and consistent with the Kawarau River Water Conservation Order.</u> ” AND Insert the following new clause or words to like effect: “(x) <u>healthy wetlands are restored in the upper and lower catchment wetland complexes, including Lake Tuakitoto</u> ” AND Insert the following new clause or words to like effect: “(x) <u>land and water management practices improve resilience to the effects of flooding and climate change</u> ”
FPI044	Director General of Conservation	FPI044.009	LF-VM - Visions and management	LF-VM-O2	Amend	In relation to the Dunstan, Manuhereikia, and Roxburgh rohe: Insert the following new clause or words to like effect: “(x) <u>water and land management recognise the drylands nature of much of this rohe and the resulting low water availability.</u> ” AND

						<p>Insert the following new clause or words to like effect: <u>“(x) Populations of threatened indigenous fish are stable or increasing”</u></p> <p>AND</p> <p>Insert the following new clause or words to like effect: <u>“(x) urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs and riparian margins.”</u></p>
FPI042	Ngāi Tahu ki Murihiku	FPI042.010	LF-VM - Visions and management	LF-VM-O2	Amend	Amend LF-VM-O2 to avoid unnecessary duplication between the overarching vision for the freshwater management unit (FMU) of Te Mata-au as a whole and visions for the five rohe that has been identified within it to make it clear where distinct outcomes are sought in the rohe.
FPI047	Horticulture New Zealand	FPI047.015	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend LF-VM-O2 as follows: <u>“(7bii) 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 that reduce emissions and improve resilience to the effects of climate change.”</u></p> <p>And</p> <p><u>(7cii)</u> <u>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 that reduce emissions and improve resilience to the effects of climate change.”</u></p>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.018	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend the provision to provide clarification of the timeframe for (1)-(6). Further, the timeframe should be amended to 2050 to align with timeframe in (8) for Manuherekia.</p> <p>Amend subsection (ii) as follows: ...discharges of nutrients and other contaminants to waterbodies <u>where necessary to ensure</u> so that they are safe for human contact,...</p> <p>Amend subsection (iii) as follows: ...discharges of nutrients and other contaminants to waterbodies <u>where necessary to ensure</u> so that they are safe for human contact,...</p>
FPI009	Central Otago Winegrowers Association	FPI009.006	LF-VM - Visions and management	LF-VM-O2	Amend	<p>Amend LF-VM-O2 Clutha Mata-Au FMU Vision to specifically recognise the importance of the provision of water to support viticulture in Otago, including through the additional sub-clause and amendments:</p> <p><u>(X) water is allocated to viticulture to support sustainable production and to provide for the social and economic wellbeing of people and communities.</u></p> <p><u>(7)(b)(ii) innovative and sustainable land and water management practices are enabled to support viticulture and 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</u></p>
FPI001	Dunedin City Council	FPI001.009	LF-VM - Visions and management	LF-VM-O3	Support	Retain LF-VM-O3 as notified.

FPI035	Wise Response Society	FPI035.006	LF-VM - Visions and management	LF-VM-O3	Amend	By 2050 <u>2035</u> in the North Otago FMU: New provision <u>(7) there are no direct discharges of wastewater to water bodies</u>
FPI045	Forest & Bird	FPI045.010	LF-VM - Visions and management	LF-VM-O3	Amend	Make the required consequential amendments to specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these are more stringent than what is provided for in LF-VM-O1
FPI002	Canterbury Regional Council (Environment Canterbury)	FPI002.001	LF-VM - Visions and management	LF-VM-O3	Support	Retain Objective LF-VM-O3 clause 1 as notified or retain the original intent.
FPI026	Federated Farmers of New Zealand	FPI026.023	LF-VM - Visions and management	LF-VM-O3	Amend	Amend LF-VM-O3 as follows (or similar) By 2050 in the <u>In consultation with the community and stakeholders a long-term vision is identified that means for the North Otago FMU:</u> fresh water is managed in accordance with the LF-WAI objectives and policies, while recognising that the Waitaki River is influenced in part by catchment areas within the Canterbury region, (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, (3) healthy riparian margins, wetlands, estuaries and lagoons (4) indigenous species can migrate easily and as naturally as possible to and from the coastal environment, (5) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and (6) innovative and sustainable land and water management practices support food production <u>primary production</u> in the area and improve resilience to the effects of climate change.
FPI024	DairyNZ Limited	FPI024.020	LF-VM - Visions and management	LF-VM-O3	Amend	Amend the timeframes in LF-VM O2-O6 based on a more thorough understanding of the implications, economic and social cost, on the community from meeting the long-term visions. As a starting point, a 50-year timeframe should be considered in FMUs where the visions will be more challenging to achieve.
FPI030	Kāi Tahu ki Otago	FPI030.021	LF-VM - Visions and management	LF-VM-O3	Amend	Amend as follows: By 2050 <u>2045</u> in the North Otago FMU: (1) ... (2) ... (3) ... (4) ... <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>(5) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact <u>and mahika kai species are safe for consumption</u>, and <u>(Y) there are no direct discharges of wastewater to water bodies, and</u></p> <p>(6) <u>food production in the area is supported by</u> innovative and sustainable land and water management practices support food production in the area and that improve resilience to the effects of climate change.</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 mātaimai and the East Otago Taiāpure in the objective.</p>
FPI016	Meridian Energy Ltd	FPI016.013	LF-VM - Visions and management	LF-VM-O3	Amend	<p>Amend LF-VM-O3(4) as follows:</p> <p>(1) fresh water is managed in accordance with the LF-WAI objectives and policies, while recognising <u>the national significance of the Waitaki hydroelectricity generation scheme and that the Waitaki River is influenced in part by catchment areas within the Canterbury region</u></p> <p>(4) <u>migration of indigenous species can migrate easily and as naturally as possible to and from the coastal environment is maintained and where practicable is enhanced</u></p>
FPI031	Oceana Gold Ltd	FPI031.006	LF-VM - Visions and management	LF-VM-O3	Amend	<p>(4) <u>provision is made for indigenous species can to migrate easily and as naturally as possible to and from the coastal environment,</u></p> <p>(5) land management practices reduce discharges of nutrients and other contaminants to water bodies so that <u>where water bodies are intended for human contact ,they are safe for human contact, and ...</u></p>
FPI017	Ravensdown Ltd	FPI017.006	LF-VM - Visions and management	LF-VM-O3	Amend	<p>Amend Objective LF-VM-O3 as follows: By 2050 in the North Otago FMU:...</p> <p>(5) land management practices reduce discharges of nutrients and other contaminants to water <u>bodies are reduced so where required to ensure that they water bodies are safe for human contact and mahika kai species are safe for consumption, and</u> <u>food production in the area is supported by</u> innovative and sustainable land and water management practices support food production in the area and that improve resilience to the effects of climate <u>change and recognise the dryland nature of much of this FMU.</u></p>
FPI044	Director General of Conservation	FPI044.010	LF-VM - Visions and management	LF-VM-O3	Amend	<p>Insert the following new clause or words to like effect: <u>“(x) water and land management recognise the drylands nature of much of this FMU and the resulting low water availability.”</u></p> <p>AND</p> <p>Insert the following new clause or words to like effect: <u>“(x) populations of threatened indigenous fish are stable or increasing”</u></p> <p>AND</p>

						Insert the following new clause or words to like effect: <u>“(x) indigenous species can migrate easily and as naturally as possible along the coast using a network of wetlands and estuaries”</u>
FPI047	Horticulture New Zealand	FPI047.017	LF-VM - Visions and management	LF-VM-O3	Amend	Amend LF-VM-O3 as follows: (6) innovative and sustainable land and water management practices support food production in the area <u>that reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and that reduce emissions</u> and improve resilience to the effects of climate change
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.019	LF-VM - Visions and management	LF-VM-O3	Amend	Amend section (5) to: -focus on a freshwater goal rather than land management practices e.g., <u>‘more waterbodies are safe for human contact more often’</u> - focus on main contaminant of concern rather than nutrients, e.g., <u>‘faecal contamination of waterbodies is reduced so that more waterbodies are suitable for human contact more often’</u> – focus on overall reduction in sources of contamination rather than all land management practices.
FPI035	Wise Response Society	FPI035.007	LF-VM - Visions and management	LF-VM-O4	Amend	By 2050 <u>2035</u> in the Taieri FMU:
FPI043	OWRUG	FPI043.002	LF-VM - Visions and management	LF-VM-O4	Amend	Amend LF-VM-O4 Taieri FMU vision to include only such goals that are sufficiently clear to enable them to be subject to a cost-benefit analysis that demonstrates that they meet the requirements of cl 3.3 of the NPS FM2020. Amend the timeframes in (8) to include only such timeframes as can be shown to be achievable <u>(8) Water is allocated to the food and fibre sector support sustainable production and the sectors contribution to social and economic wellbeing of the community.</u> <u>(9) the role of water storage is recognised as being fundamental to the food and fibre sector, and an essential part of meeting the vision as set out in (1) to (8) above.</u>
FPI045	Forest & Bird	FPI045.011	LF-VM - Visions and management	LF-VM-O4	Amend	Make the required consequential amendments to specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these are more stringent than what is provided for in LF-VM-O1
FPI026	Federated Farmers of New Zealand	FPI026.024	LF-VM - Visions and management	LF-VM-O4	Amend	Amend LF-VM-O4 as follows (or similar) <u>By 2050 in the In consultation with the community and stakeholders a long-term vision is identified that means for the Taieri FMU:</u> (1) fresh water is managed in accordance with the LF-WAI objectives and policies, (2) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained, healthy wetlands are restored in the upper and lower catchment wetland complexes, including the Waipori/Waihola Wetlands, Tunaheketaka/Lake Taieri, scroll plain , and tussock areas,

						<p>(3) <u>The Upper Taieri Scroll Plain and wetland complex is managed by an active, co-ordinated and specific management plan that enhances and protects its unique hydrological, ecological and recreational values.</u></p> <p>(4) the gravel bed of the lower Taieri is restored and sedimentation of the Waipori/Waihola complex is reduced</p> <p>(5) creative ecological approaches contribute to reduced occurrence of didymo,</p> <p>(6) water bodies support healthy populations of galaxiid species,</p> <p>(7) there are no direct discharges of wastewater to water bodies, and</p> <p>(8) innovative and sustainable land and water management practices support food production <u>primary production</u> in the area and improve resilience to the effects of climate change.</p>
FPI001	Dunedin City Council	FPI001.010	LF-VM - Visions and management	LF-VM-O4	Amend	Amend LF-VM-O4 (3) and (7) to address the points raised.
FPI024	DairyNZ Limited	FPI024.021	LF-VM - Visions and management	LF-VM-O4	Amend	Amend the timeframes in LF-VM O2-O6 based on a more thorough understanding of the implications, economic and social cost, on the community from meeting the long-term visions. As a starting point, a 50-year timeframe should be considered in FMUs where the visions will be more challenging to achieve.
FPI030	Kāi Tahu ki Otago	FPI030.022	LF-VM - Visions and management	LF-VM-O4	Amend	<p>Amend as follows:</p> <p>By 2050 <u>2045</u> in the Taieri <u>Taiari</u> FMU:</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>healthy wetlands are restored in the upper and lower catchment wetland complexes, including the Waipori/Waihola Wetlands <u>Waihola/Waipōuri wetland complex</u>, Tunaheketaka/Lake Taieri, scroll plain, and tussock areas,</p> <p>the gravel bed of the lower Taieri <u>Taiari</u> is restored and sedimentation of the Waipori/Waihola <u>Waihola/Waipōuri wetland</u> complex is reduced,</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> (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> (7) ...</p>

						(8) <u>food production in the area is supported by</u> innovative and sustainable land and water management practices support food production in the area and that improve resilience to the effects of climate change.
FPI022	Manawa Energy Ltd	FPI022.005	LF-VM - Visions and management	LF-VM-O4	Amend	Add the following clause to LF – VM – O4 Taieri FMU vision: <u>(9) the national and regional significance of the Deep Stream, Waipori and Paerau / Patearoa hydro-electric power schemes are recognised.</u> Amend clause (3) to read: (3) healthy wetlands are restored in the upper and lower catchment wetland complexes, including the Waipori/Waihola Wetlands, Tunaheketaka/Lake Taieri, scroll plain, and <u>connected</u> tussock areas,
FPI007	John Highton	FPI007.011	LF-VM - Visions and management	LF-VM-O4	Amend	Amend LF – VM – O4(3) to add specific mention of the Upper Taieri Scroll Plain and its significance
FPI007	John Highton	FPI007.012	LF-VM - Visions and management	LF-VM-O4	Support	Retain LF – VM – O4(4) as notified.
FPI007	John Highton	FPI007.013	LF-VM - Visions and management	LF-VM-O4	Amend	Amend LF–VM –O4(5) as Didymo is not specifically an issue on the Taieri. This statement should be highlighted/included in the Clutha vision or as a separate section, not in a paragraph specific to the Taieri.
FPI017	Ravensdown Ltd	FPI017.007	LF-VM - Visions and management	LF-VM-O4	Amend	Amend Objective LF-VM-O4 as follows: By 2050 in the Taieri <u>Taiari</u> FMU: ... <u>food production in the area is supported by</u> 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>including flooding.</u>
FPI044	Director General of Conservation	FPI044.011	LF-VM - Visions and management	LF-VM-O4	Amend	Amend Clause 1 as follows or words to like effect: “(1). fresh water is managed in accordance with the LF-WAI objectives and policies, <u>and consistent with the status of the catchment as a Ngā Awa river.</u> ” AND Amend Clause 3 as follows or words to like effect: “(3) healthy wetlands are restored in the upper and lower catchment wetland complexes, including the Waipori/Waihola Wetlands, Tunaheketaka/Lake Taieri, scroll plain <u>Upper Taiari Wetland Complex</u> , and tussock areas AND Amend Clause 6 as follows or words to like effect: “(6). water bodies support healthy populations of galaxiid species, <u>kanakana / lamprey and tuna / longfin eel.</u> ” AND Insert the following new clause or words to like effect: “(x) <u>land and water management practices improve resilience to the effects of flooding and climate change</u> ”

						<p>AND Insert the following new clause or words to like effect: <u>“(x) indigenous species can migrate easily and as naturally as possible along the coast using a network of wetlands and estuaries”</u></p> <p>AND Insert the following new clause or words to like effect: <u>“(x) discharges from Lake Mahinerangi and Loganburn are managed to avoid adverse effects on downstream ecosystem function”</u></p>
FPI047	Horticulture New Zealand	FPI047.018	LF-VM - Visions and management	LF-VM-O4	Amend	Amend LF-VM-O4 as follows: (8) innovative and sustainable land and water management practices support food production in the area <u>that reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and that reduce emissions and improve resilience to the effects of climate change.</u>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.020	LF-VM - Visions and management	LF-VM-O4	Amend	Amend to provide clarification on what level of restoration is required. If the drafting intended to capture healthy wetlands rather than degraded wetlands, provide an explanation as to why ORC considers that healthy wetlands need restoration rather than sustainment.
FPI035	Wise Response Society	FPI035.008	LF-VM - Visions and management	LF-VM-O5	Amend	By 2040 <u>2035</u> in the Dunedin & Coast FMU:
FPI045	Forest & Bird	FPI045.012	LF-VM - Visions and management	LF-VM-O5	Amend	Make the required consequential amendments to specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these are more stringent than what is provided for in LF-VM-O1
FPI026	Federated Farmers of New Zealand	FPI026.025	LF-VM - Visions and management	LF-VM-O5	Amend	<p>Amend LF-VM-O5 as follows (or similar): <u>By 2040 in the In consultation with the community and stakeholders a long-term vision is identified that means for the Dunedin & Coast FMU:</u></p> <ol style="list-style-type: none"> (1) fresh water is managed in accordance with the LF-WAI objectives and policies, (2) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained, (3) healthy estuaries, lagoons and coastal waters support thriving mahika kāi and downstream coastal ecosystems, and indigenous species can migrate easily and as naturally as possible to and from these areas, 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 <p>(5) discharges of contaminants from urban environments are reduced so that water bodies are safe for human contact.</p> <p>(6) <u>innovative and sustainable land and water management practices support primary production in the area and improve resilience to the effects of climate change.</u></p>

FPI001	Dunedin City Council	FPI001.011	LF-VM - Visions and management	LF-VM-O5	Amend	Amend the vision, along with the means and timeframes of attaining the vision given some specific catchment challenges, for the Dunedin & Coast FMU to address issues raised.
FPI001	Dunedin City Council	FPI001.012	LF-VM - Visions and management	LF-VM-O5	Amend	LF-VM-05(3) – Amend this objective and the objectives in the Coastal environment chapter to address issues raised. Amend policy CE-P1 – Links with other chapters, to include reference to the land and freshwater chapter.
FPI001	Dunedin City Council	FPI001.013	LF-VM - Visions and management	LF-VM-O5	Amend	LF-VM-05(4) – Amend as follows: “ there is no further <u>minimise</u> modification of the shape and behaviour of the water bodies and <u>promote</u> opportunities to restore the natural form and function of water bodies are promoted wherever possible”. Alternatively, amend the first part of (4) with wording that aligns with clause 3.24(1) of the NPS-FM 2020, which refers to the loss of river extent and values.
FPI001	Dunedin City Council	FPI001.014	LF-VM - Visions and management	LF-VM-O5	Amend	LF-VM-05(5) – Amend to “discharges of contaminants from urban environments are reduced so that water bodies are safe for human contact.”
FPI024	DairyNZ Limited	FPI024.022	LF-VM - Visions and management	LF-VM-O5	Amend	Amend the timeframes in LF-VM O2-O6 based on a more thorough understanding of the implications, economic and social cost, on the community from meeting the long-term visions. As a starting point, a 50-year timeframe should be considered in FMUs where the visions will be more challenging to achieve.
FPI030	Kāi Tahu ki Otago	FPI030.023	LF-VM - Visions and management	LF-VM-O5	Amend	Amend as follows: By 2040 in the Dunedin & Coast FMU: (1) ... (2) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained <u>and Kāi Tahu maintain their connection with and use of the water bodies,</u> (3) ... (4) ... (5) (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> <u>(X) there are no direct discharges of wastewater to water bodies.</u> 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 mātaihai and the East Otago Taiāpure in the objective.
FPI018	Waka Kotahi	FPI018.002	LF-VM - Visions and management	LF-VM-O5	Amend	Amend Objective LF-VM-O5 as follows:

						<p>“By 2040 in the Dunedin & Coast FMU</p> <p>....</p> <p>(4) minimise there is no further modification of the shape and behaviour of the water bodies and <u>promote opportunities to restore the natural form and function of water bodies, are promoted</u> wherever possible,</p> <p>...”</p>
FPI007	John Highton	FPI007.014	LF-VM - Visions and management	LF-VM-O5	Amend	Amend to include restoration of amenity values of the Leith and restoration of the ability of migratory fish to get up the Leith. Restore the Tomahawk Lagoon ,look after the Kaikorai stream and estuary and take care of the Silverstream.
FPI017	Ravensdown Ltd	FPI017.008	LF-VM - Visions and management	LF-VM-O5	Amend	Amend Objective LF-VM-05 as follows: By 2040 in the Dunedin & Coast FMU:... <u>food production in the area is supported by innovative and sustainable land and water management practices that improve resilience to the effects of climate change.</u>
FPI044	Director General of Conservation	FPI044.012	LF-VM - Visions and management	LF-VM-O5	Amend	Amend Clause 5 as follows or words to like effect: “(5) discharges of contaminants from urban environments are reduced so that water bodies are safe for human contact <u>and able to support healthy indigenous biodiversity and ecosystems.</u> <p>AND</p> <p>Insert the following new clause or words to like effect: <u>“(x) urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins, estuaries and the coastal environment.”</u></p> <p>AND</p> <p>Insert the following new clause or words to like effect: <u>“(x) indigenous species can migrate easily and as naturally as possible along the coast using a network of wetlands and estuaries”</u></p>
FPI047	Horticulture New Zealand	FPI047.019	LF-VM - Visions and management	LF-VM-O5	Amend	Amend LF-VM-O5 as follows: <u>(6) innovative and sustainable land and water management practices support food production in the area that reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and that reduce emissions and improve resilience to the effects of climate change.</u>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.021	LF-VM - Visions and management	LF-VM-O5	Amend	Amend Clause (4) as follows or similar to achieve a similar outcome: <u>(4) there is no further modification of the shape and behaviour the natural character (including natural form and function) of the water bodies is maintained, and opportunities to restore the natural form and function of waterbodies are promoted wherever possible, and...</u>
FPI035	Wise Response Society	FPI035.009	LF-VM - Visions and management	LF-VM-O6	Support	Retain as notified
FPI045	Forest & Bird	FPI045.013	LF-VM - Visions and management	LF-VM-O6	Amend	Make the required consequential amendments to specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these are more stringent than what is

						provided for in LF-VM-O1
FPI026	Federated Farmers of New Zealand	FPI026.026	LF-VM - Visions and management	LF-VM-O6	Amend	<p>Amend LF-VM-O6 as follows (or similar): <u>In consultation with the community and stakeholders a longterm vision is identified that means for the</u> By 2030 in the Catlins FMU:</p> <p>(1) fresh water is managed in accordance with the LF-WAI objectives and policies,</p> <p>(2) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained,</p> <p>(3) water bodies support thriving mahika kāi and access of Kāi Tahu whānui to mahika kāi,</p> <p>(4) the high degree of naturalness and ecosystem connections between the forests, freshwater and coastal environment are preserved,</p> <p>(5) water bodies and their catchment areas support the health and well-being of coastal water, ecosystems and indigenous species, including downstream kāimoana, and healthy, clear and clean water supports opportunities for recreation and sustainable food production <u>primary production</u> for future generations.</p> <p><u>(6) innovative and sustainable land and water management practices support primary production in the area and improve resilience to the effects of climate change.</u></p>
FPI024	DairyNZ Limited	FPI024.023	LF-VM - Visions and management	LF-VM-O6	Amend	Amend the timeframes in LF-VM O2-O6 based on a more thorough understanding of the implications, economic and social cost, on the community from meeting the long-term visions. As a starting point, a 50-year timeframe should be considered in FMUs where the visions will be more challenging to achieve.
FPI030	Kāi Tahu ki Otago	FPI030.024	LF-VM - Visions and management	LF-VM-O6	Amend	<p>Amend as follows:</p> <p>By 2030 in the Catlins FMU:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) water bodies support thriving mahika kai <u>that is safe for consumption, and</u> access of Kāi Tahu whānui to mahika kai,</p> <p>(4) the high degree of naturalness <u>of the water bodies</u> and ecosystem connections between the forests, freshwater and coastal environment are preserved,</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) ...</p> <p><u>(Y) there are no direct discharges of wastewater to water bodies, and</u></p> <p>(6) ...</p>
FPI017	Ravensdown Ltd	FPI017.009	LF-VM - Visions and management	LF-VM-O6	Amend	Amend Objective LF-VM-O6 as follows: By 2030 in the Catlins FMU:...

						(6) healthy, clear and clean water supports opportunities for recreation and sustainable agriculture, including food production, for future generations, and food production in the area is supported by innovative and sustainable land and water management practices that improve resilience to the effects of climate change.
FPI044	Director General of Conservation	FPI044.013	LF-VM - Visions and management	LF-VM-O6	Amend	Insert the following new clause or words to like effect: “x. <u>indigenous species can migrate easily and as naturally as possible to and from the coastal environment.</u> ” AND Insert the following new clause or words to like effect: “ <u>(x) indigenous species can migrate easily and as naturally as possible along the coast using a network of wetlands and estuaries</u> ”
FPI042	Ngāi Tahu ki Murihiku	FPI042.011	LF-VM - Visions and management	LF-VM-O6	Amend	Amend LF-VM-O6 to use phrasing consistent with the overarching vision for Te Mata-au where the same outcome is intended for the provision to help make it clear where distinct outcomes are sought for the Catlins, Te Ākau Tai Toka, due to the characteristics of this FMU. The provision in LF-VM-O2 that seeks to have no direct discharges of wastewater to waterbodies should be replicated in LF-VM-O6.
FPI047	Horticulture New Zealand	FPI047.020	LF-VM - Visions and management	LF-VM-O6	Amend	Amend LF-VM-O6 as follows: 7) <u>innovative and sustainable land and water management practices support food production in the area that reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and that reduce emissions and improve resilience to the effects of climate change.</u>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.022	LF-VM - Visions and management	LF-VM-O6	Amend	Redraft provision to support enhancement of access where appropriate, e.g., ‘ <u>access of Kāi Tahu whānui to mahika kai is maintained and its improvement is promoted where appropriate</u> ’.
FPI046	QLDC	FPI046.005	LF-VM - Visions and management	LF-VM-P5	Support	Retain as notified
FPI021	Ballance Agri-Nutrients Ltd	FPI021.003	LF-VM - Visions and management	LF-VM-P5	Support	Retain as notified.
FPI027	Contact Energy Limited	FPI027.020	LF-VM - Visions and management	LF-VM-P5	Support	Contact supports the proposed freshwater management units and rohe as set out in this policy.
FPI024	DairyNZ Limited	FPI024.024	LF-VM - Visions and management	LF-VM-P5	Support	We seek this policy to be retained as it is.
FPI030	Kāi Tahu ki Otago	FPI030.025	LF-VM - Visions and management	LF-VM-P5	Amend	Retain LF-VM-P5 as notified, but see submission point on MAP1
FPI044	Director General of Conservation	FPI044.014	LF-VM - Visions and management	LF-VM-P5	Support	Retain as notified, subject to consideration of any changes sought in other submissions.
FPI026	Federated Farmers of New Zealand	FPI026.027	LF-VM - Visions and management	LF-VM-P5	Amend	Amend that Taieri FMU should be split into rohe

FPI001	Dunedin City Council	FPI001.015	LF-VM - Visions and management	LF-VM-P5	Amend	Amend boundaries of North Otago and Dunedin & Coast FMUs so that the Waikōuaiti River catchment is included in the Dunedin & Coast FMU.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.023	LF-VM - Visions and management	LF-VM-P5	Amend	<p>Oppose the entire LF Chapter. As per 2021 Submission Point 24, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission, in summary:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>
FPI046	QLDC	FPI046.006	LF-VM - Visions and management	LF-VM-P6	Support	Retain as notified
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.020	LF-VM - Visions and management	LF-VM-P6	Support	Retain as notified.
FPI024	DairyNZ Limited	FPI024.025	LF-VM - Visions and management	LF-VM-P6	Support	Retain as notified.
FPI035	Wise Response Society	FPI035.010	LF-VM - Visions and management	LF-VM-P6	Amend	Where rohe have been defined within FMUs: (1) environmental outcomes must be developed for the FMU within which the rohe is located, <u>based on a thorough review of local, national and international risks, limits and trends with the potential to significantly affect the environment and resources.</u>
FPI027	Contact Energy Limited	FPI027.022	LF-VM - Visions and management	LF-VM-P6	Amend	Contact seeks amendments to the policy to recognise section 3.31 of the NPSFM.
FPI030	Kāi Tahu ki Otago	FPI030.026	LF-VM - Visions and management	LF-VM-P6	Amend	<p>Amend as follows:</p> <p>Where rohe have been defined within FMUs:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(a) <u>must</u> 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 ...</p>
FPI031	Oceana Gold Ltd	FPI031.005	LF-VM - Visions and management	LF-VM-P6	Amend	amendments are required to ensure this policy reflects the requirements of the NPS-FM

FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.024	LF-VM - Visions and management	LF-VM-P6	Amend	Amend policy so that it properly reflects the requirements of the NPSFM.
FPI021	Ballance Agri-Nutrients Ltd	FPI021.004	LF-VM - Visions and management	LF-VM-P6	Amend	<p>Amend LF-VM-P6 –Relationship between FMUs and rohe, with minor amendments, as follows:</p> <p>LF-VM-P6 –Relationship between FMUs and rohe Where rohe have been defined within FMUs:</p> <p>(1) environmental outcomes must be developed for the FMU within which the rohe is located,</p> <p>(2) if <u>any additional rohe-specific environmental outcomes are included for rohe, those environmental outcomes:</u></p> <p>(a) must set target attribute states <u>in consultation with Kāi Tahu and the community</u> that are no less stringent than the parent FMU environmental outcomes if the same attributes are adopted in both the rohe and the FMU, and</p> <p>(b) may include additional attributes and target attribute states provided that any additional environmental outcomes give effect to the environmental outcomes for the FMU,</p> <p>(3) limits and action plans to achieve environmental outcomes, <u>including by achieving target attribute states</u>, may be developed for the FMU or the rohe or a combination of both, <u>in consultation with Kāi Tahu and the community</u></p> <p>(4) any limit or action plan developed to apply within a rohe:</p> <p>(a) prevails over any limit or action plan developed for the FMU for the same attribute, unless explicitly stated to the contrary, and</p> <p>(b) must be no less stringent than any <u>limit or action plan</u> set for the parent FMU for the same attribute, and (c) must not conflict with any <u>limit or action plan</u> set for the <u>underlying parent</u> FMU for attributes that are not the same, and</p> <p>(5) the term “no less stringent” in this policy applies to attribute states (numeric and narrative) and any other metrics and timeframes (if applicable).</p>
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.024	LF-VM - Visions and management	LF-VM-M3	Amend	LF-VM-M3 – add Support community transition and phase out of practices and approaches that degrade freshwater and groundwater systems and contribute to climate change, through a range of tools including rules (to phase out synthetic nitrogen fertiliser by 2024 and intensive grazing), financial instruments and other means to raise environmental standards beyond currently diminished ecological states and to achieve the objectives of the Government’s Essential Freshwater reforms, the NPS-FM and Te Mana o te Wai.
FPI024	DairyNZ Limited	FPI024.026	LF-VM - Visions and management	LF-VM-E2	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.027	LF-VM - Visions and management	LF-VM-E2	Support	Retain as notified.
FPI035	Wise Response Society	FPI035.004	LF-VM - Visions and management	LF-VM-E2	Amend	Ensure that the wording of the different FMU and Rohe are as consistent in scope and target attribute state as possible. Essentially these must all be consistent with achieving emission reduction, life-supporting, integration and resilience objectives elsewhere in the RPS.

FPI043	OWRUG	FPI043.070	LF-VM - Visions and management	LF-VM-E2	Amend	Consequential amendments to give effect to relief sought
FPI027	Contact Energy Limited	FPI027.023	LF-VM - Visions and management	LF-VM-E2	Amend	Contact seeks amendments to the explanation to reflect clause 3.31 of the NPSFM.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.025	LF-VM - Visions and management	LF-VM-E2	Amend	<p>Oppose the entire LF Chapter. As per 2021 Submission Point 24, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission, in summary:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>

LF-FW – Freshwater

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI037	Fish & Game	FPI037.062	LF-FW - Freshwater	General submission	Amend	Retain, subject to relief sought.
FPI043	OWRUG	FPI043.003	LF-FW - Freshwater	General submission	Amend	The Land and Freshwater section of the pRPS should set out a framework for setting timeframes to achieve long-term visions over a transition period, for the Regional Council to use when developing regional plan provisions to achieve long-term visions for freshwater across the Otago region. This framework should allow the food and fibre sector time to adjust at a rate that accounts for the potentially significant impacts on their social, economic, and cultural well-being.
FPI046	QLDC	FPI046.015	LF-FW - Freshwater	General submission	Amend	That an additional LF-FW-AER be added in line with desired outcomes as follows: <u>Fresh water is allocated in a way that will deliver a balance of social, cultural, economic, and environmental outcomes that ensure the wellbeing of local communities.</u>
FPI030	Kāi Tahu ki Otago	FPI030.045	LF-FW - Freshwater	General submission	Amend	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
FPI038	NZSki Ltd	FPI038.012	LF-FW - Freshwater	New provision	Amend	LF-FW-NEW POLICY – Promoting awareness of and access to natural wetlands <u>Support activities which result in either of 1-4 of LF-FW-P10 above, or improve people’s awareness of, and access to, natural wetlands for customary, or scientific, or education, or recreational uses.</u>
FPI039	Realnz	FPI039.014	LF-FW - Freshwater	New provision	Amend	Insert LF-FW-NEW POLICY – Promoting awareness of and access to <i>natural wetlands</i> <u>Support activities which result in either of 1-4 of LF-FW-P10 above, or improve people’s awareness of, and access to, natural wetlands for customary, or scientific, or education, or recreational uses.</u>
FPI016	Meridian Energy Ltd	FPI016.018	LF-FW - Freshwater	New provision	Amend	Insert a new LF-FW policy as follows: <i>provide for the off-stream storage of surface water where storage will give effect to the objectives and policies of this RPS</i>

FPI041	McArthur Ridge Vineyard Ltd	FPI041.007	LF-FW – Freshwater	New provision	Amend	<p>Adopt the Proposed Marlborough Environment Plan approach to viticulture’s water needs, or in a way that provides priority for viticulture. Add an additional objective and policies as below after LF-FW-08 and LF-FW-P7</p> <p><i>Objective XX –To achieve efficient water use for any given activity</i> <i>Policy XX – When resource consent is to be granted to use water, every proposed use will be authorised by a separate water permit. Categories include municipal, irrigation, industrial, residential, commercial and frost fighting.</i> <i>Policy XX – To allocate water on the basis of reasonable demand given the intended use.</i> <i>Policy XX – Have regard to the efficiency of the proposed method of distribution and/or irrigation in determining resource consent applications to use water for irrigation purposes.</i> <i>Add Policy 5.7.8 – 5.7.11 from the Marlborough Environment Plan that are a suite of policies specifically directed at management of water for frost fighting purposes.</i></p>
FPI035	Wise Response Society	FPI035.019	LF-FW - Freshwater	New provision	Amend	<p>Insert new Policy: <u>Regional and district plans are to require the use of potentially harmful chemical substances to be fully justified and if use is approved, any polluting side effects will be monitored and reported on.</u></p>
FPI037	Fish & Game	FPI037.021	LF-FW - Freshwater	New provision	Amend	<p><u>LF-FW-Mx – Identifying and managing species interactions between trout and salmon and indigenous species</u> <u>(1) Local authorities:</u> <u>(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 Conservation, the Fish & Game Council relevant to the area, Kāi Tahu, and the matters set out in LF-FW-Mx(2)(a) to (c), and</u> <u>(2) Otago Regional Council will work with the Department of Conservation, the relevant Fish & Game Council and Kāi Tahu, to:</u> <u>(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</u> <u>(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</u> <u>(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:</u> <u>(i) determine information needs to manage the species, and</u> <u>(ii) determine short, medium and long term objectives, and</u> <u>(iii) determine appropriate management actions that will achieve objectives determined in (ii) and account for habitat needs, and</u> <u>(iv) use tools available within the Conservation Act 1987, where appropriate.</u></p>
FPI046	QLDC	FPI046.007	LF-FW - Freshwater	LF-FW-08	Support	Retain as notified.
FPI001	Dunedin City Council	FPI001.016	LF-FW - Freshwater	LF-FW-08	Support	Retain Objective LF-FW-08 as notified.
FPI047	Horticulture New Zealand	FPI047.022	LF-FW - Freshwater	LF-FW-08	Oppose	Delete LF-FW-08 (2)

FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.026	LF-FW - Freshwater	LF-FW-O8	Oppose	Suggest deleting entire policy or retaining sections (3) and (5) only. If section (5) is retained, amend (5) as follows: the significant and outstanding values of Otago's outstanding water bodies are identified and protected <u>sustained</u> .
FPI035	Wise Response Society	FPI035.011	LF-FW - Freshwater	LF-FW-O8	Amend	In Otago's water bodies and their catchments: (1) the health of the wai supports the health of the people and thriving mahika kai, <u>with water quality in all degraded water bodies in the region improved to a minimum of amenity and contact recreation standard by 2035.</u> (2) water flow is continuous throughout the whole system <u>with fundamental hydrological process functioning normally.</u> ... (5) the significant and outstanding values of Otago's outstanding water bodies are identified, <u>restored where degraded</u> and protected. (6) <u>the soils and cover are being managed to maximise the natural capture, retention and infiltration of rainfall within the land and minimising the need for artificial fertilizer.</u> (7) <u>management is as "whole systems" that maximise resilience, biophysical capacity and community wellbeing</u>
FPI037	Fish & Game	FPI037.015	LF-FW - Freshwater	LF-FW-O8	Amend	<u>(1a) the health, well-being and resilience of water bodies is prioritised,</u> ... (4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected <u>and restored, and</u> <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>
FPI038	NZSki Ltd	FPI038.009	LF-FW - Freshwater	LF-FW-O8	Amend	In Otago's water bodies and their catchments: (5) the significant and outstanding values of Otago's outstanding water bodies are identified and protected <u>from inappropriate subdivision, use and development.</u>
FPI039	Realnz	FPI039.011	LF-FW - Freshwater	LF-FW-O8	Amend	In Otago's water bodies and their catchments: (5) the significant and outstanding values of Otago's outstanding water bodies are identified and protected <u>from inappropriate subdivision, use and development.</u>
FPI043	OWRUG	FPI043.064	LF-FW - Freshwater	LF-FW-O8	Amend	<u>(1) the health of the wai supports the health of the people and thriving mahika kai, and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future,</u> <u>(2) water flow is continuous throughout the whole system, where this is consistent with the natural system;</u> Add following clause at (6): <u>sustainable and integrated water allocation and abstraction supports food and fibre production.</u>
FPI045	Forest & Bird	FPI045.014	LF-FW - Freshwater	LF-FW-O8	Amend	Add the following clause to LF-FW-O8 – Fresh water: <u>(6) the objectives set out in LF-VM-O1 - LF-VM-O6 are achieved</u>

FPI026	Federated Farmers of New Zealand	FPI026.028	LF-FW - Freshwater	LF-FW-08	Amend	<p>Amend LF–FW–08 as follows: <i>In Otago’s water bodies and their catchments:</i> (1) <u>the health of the wai supports the health of the people, and thriving mahika k̄ai, and the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future,</u> (2) water flow is continuous throughout the whole system</p> <p>(3) <i>the interconnection of fresh water (including groundwater) and coastal waters is recognised,</i> (4) <i>native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and</i> (5) <i>the significant and outstanding values of Otago’s outstanding water bodies are identified and protected.,</i> <u>sustainable and integrated water allocation and abstraction supports primary production and rural communities</u></p>
FPI019	Fonterra Co-operative Group Ltd	FPI019.007	LF-FW - Freshwater	LF-FW-08	Amend	<p>Amend the objective as follows: <i>In Otago’s water bodies and their catchments:</i> (1) <u>the health of the wai supports the health of the people and thriving mahika kai, and the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future,</u> 2) water flow is continuous throughout the whole system, ... (6) <u>within environmental limits, water allocation and abstraction support primary production and industry.</u></p>
FPI023	Moutere Station Ltd	FPI023.009	LF-FW - Freshwater	LF-FW-08	Amend	<p>Amend LF-FW-08 to: ... (2) <u>where appropriate</u> water flow is continuous throughout the whole system ... (4) <u>Where appropriate</u> native fish can migrate easily and as naturally as possible....</p>
FPI020	Silver Fern Farms Ltd	FPI020.013	LF-FW - Freshwater	LF-FW-08	Amend	Delete LF-FW-08(2)
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.022	LF-FW - Freshwater	LF-FW-08	Amend	<p>Amend LF–FW–08 as follows: <i>In Otago’s water bodies and their catchments:</i> ... (3) <u>the interconnection of land, fresh water (including groundwater) and coastal waters is recognised,</u> ... </p>
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.025	LF-FW - Freshwater	LF-FW-08	Amend	LF-FW08 - Objectives - 1. We suggest this be written: “the health <i>and wellbeing</i> of the wai must be restored within <i>specified (legislated) timeframes for its intrinsic and ecosystem values,</i> and to support the health of people and thriving mahinga kai...”

						Amend Objective 2 as follows: 'water flow is continuous <i>and at volumes and levels that support ecosystem health, habitat, and resilience as measured by biological thresholds and ecological and biological community health</i> '.
FPI027	Contact Energy Limited	FPI027.024	LF-FW - Freshwater	LF-FW-O8	Amend	Contact requests that this objective to address the concerns noted. By way of example only, Contact proposes the following amendments to the objective (using the background document version as base text): LF-FW-O8 – Fresh water In Otago's water bodies and their catchments: (1) the health of the wai supports the health of the people, <u>their connections with water bodies, and thriving mahika kai mahika kai,</u> (2) water flow is continuous throughout the whole system, <u>within catchments (ki uta ki tai), artificial interruption of water flow is minimised to the smallest <u>degree extent reasonably practicable,</u> (3) the interconnection of fresh water (including groundwater) and coastal waters is recognised, (4) native fish can migrate easily and as naturally as possible <u>practicable</u> and taoka species and their habitats are protected <u>and sustained to the extent reasonably practicable, and</u> (5) the significant and outstanding values of Otago's outstanding water bodies are identified and protected, <u>and</u> (6) <u>the contribution of fresh water to hydroelectric generation, and the nationally significant Clutha Hydro Scheme is recognised, provided for and protected, including consideration of generation capacity, storage and operational flexibility</u></u>
FPI024	DairyNZ Limited	FPI024.027	LF-FW - Freshwater	LF-FW-O8	Amend	Amend Clause 1 and 2 as follows: In Otago's water bodies and their catchments: (1) the health of the wai supports the health of the people and thriving mahika kai, <u>and the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future,</u> (2) water flow is continuous throughout the whole system, <i>or, add words that recognise that a continuous flow is not always part of a natural system.</i>
FPI030	Kāi Tahu ki Otago	FPI030.028	LF-FW - Freshwater	LF-FW-O8	Amend	Amend as follows: <i>In Otago's water bodies and their catchments:</i> (2) ...

						<p>(3) <i>the interconnection of <u>land</u>, fresh water (including groundwater) and coastal waters is recognised,</i></p> <p><i>native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected <u>and sustained</u>,</i></p>
FPI016	Meridian Energy Ltd	FPI016.014	LF-FW - Freshwater	LF-FW-O8	Amend	<p>Amend LF-FW-O8 as follows:</p> <p><i>In Otago's <u>freshwater</u> water bodies and their catchments:</i></p> <p>(2) <i>the health of the wai supports the health of the people and thriving mahika kai,</i></p> <p>(3) <i>water flow is continuous throughout the whole system,</i></p> <p>(4) ...</p> <p>(5) <i>native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and</i></p> <p>(6) <i>the significant and outstanding values of Otago's outstanding water bodies are identified and protected,</i></p> <p><u><i>and freshwater is managed as part of New Zealand's integrated response to climate change and renewable electricity generation activities are provided for.</i></u></p>
FPI031	Oceana Gold Ltd	FPI031.007	LF-FW - Freshwater	LF-FW-O8	Amend	<p>LF-FW-O8 – Fresh water</p> <p>In Otago's water bodies and their catchments:</p> <p>(1) the health of the wai supports the health of the people and thriving mahika kai,</p> <p>(2) <u>where practicable,</u> water flow is continuous throughout the whole system,</p> <p>(3) ...</p> <p>(4) <u>native fish migration is provided for and the values of their habitat are maintained and enhanced can migrate easily and as naturally as possible and taoka species and their habitats are protected,</u> and</p> <p>(5) ...</p>
FPI018	Waka Kotahi	FPI018.003	LF-FW - Freshwater	LF-FW-O8	Amend	<p>Amend Objective LF-FW-O8 as follows:</p> <p><i>"In Otago's water bodies and their catchments:</i></p> <p>...</p> <p><i>(5) the significant and outstanding values of Otago's outstanding water bodies are identified and protected, <u>except for regionally and nationally significant infrastructure which shall be managed in accordance with EITINF-P13 and P13A.</u>"</i></p>
FPI007	John Highton	FPI007.015	LF-FW - Freshwater	LF-FW-O8	Amend	<p>Amend to include providing for valued introduced species including protection of their habitat and recognition of their need for migration to maintain healthy populations</p>
FPI044	Director General of Conservation	FPI044.015	LF-FW - Freshwater	LF-FW-O8	Amend	<p>Amend Clause (3) as follows or words to like effect:</p> <p><i>"(3) the interconnection of <u>land</u> fresh water (including groundwater) and coastal waters is recognised,</i></p> <p>AND insert the following new clauses or words to like effect:</p> <p><i>"(x) <u>fresh water sustains indigenous vegetation, fauna and ecosystems</u>",</i></p> <p>AND</p>

						<p>“(x) <u>non-diadromous galaxiid and Canterbury mudfish populations and their habitats are protected and restored</u>”</p> <p>AND</p> <p>“(x) <u>habitats that are essential for specific components of the life cycle of indigenous species, including breeding and spawning grounds, juvenile nursery areas, important feeding areas and migratory and dispersal pathways, are protected and restored</u>”</p> <p>AND</p> <p>“(x) <u>changes to flows, fish passage or fish barriers only occur where doing so would not enable the passage of undesirable fish species where it is considered necessary to prevent their passage in order to protect desired fish species, their life stages, or their habitats</u>”</p>
FPI047	Horticulture New Zealand	FPI047.021	LF-FW - Freshwater	LF-FW-08	Amend	Amend LF-FM-08 as follows: (1) the health of the wai supports the health <u>and well-being</u> needs of the people and thriving mahika kai
FPI021	Ballance Agri-Nutrients Ltd	FPI021.005	LF-FW - Freshwater	LF-FW-08	Amend	Amend LF-FW-08 – Fresh water as follows: LF-FW-08 – Fresh water
						<p>In Otago’s water bodies and their catchments:</p> <p>(1) the health of the wai supports the health of the people, <u>their connections with water bodies</u> and thriving mahika kai,</p> <p>(2) water flow is continuous throughout the whole system <u>within catchments (ki uta ki tai), artificial interruption of water flow is minimised,</u></p> <p>(3) the interconnection of fresh water (including groundwater) and coastal waters is recognised,</p> <p>(4) native indigenous freshwater species fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and</p> <p>(5) the significant and outstanding values of Otago’s outstanding water bodies are identified and protected.</p>
FPI009	Central Otago Winegrowers Association	FPI009.007	LF-FW - Freshwater	LF-FW-08	Amend	Amend LF-FW-08 – Fresh water as follows: In Otago’s water bodies and their catchments:
						<p>1) the health of the wai supports the health of the people and thriving mahika kai,</p> <p>2) <u>Enable people and communities to provide for their social, economic, and cultural wellbeing through environmental outcomes, attribute states and limits,</u></p> <p>...</p>
FPI045	Forest & Bird	FPI045.015	LF-FW - Freshwater	LF-FW-09	Support	Retain as notified
FPI046	QLDC	FPI046.008	LF-FW - Freshwater	LF-FW-09	Support	Retain as notified
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.023	LF-FW - Freshwater	LF-FW-09	Support	Retain as notified.

FPI001	Dunedin City Council	FPI001.017	LF-FW - Freshwater	LF-FW-09	Support	Retain Objective LF-FW-09 as notified.
FPI026	Federated Farmers of New Zealand	FPI026.029	LF-FW - Freshwater	LF-FW-09	Oppose	Delete policy LF-FW-09 <i>Otago's natural wetlands are protected or restored so that:</i> <i>(1) mahika k̄ai and other mana whenua values are sustained and enhanced now and for future generations,</i> <i>(2) there is no decrease in the range and diversity of indigenous ecosystem types and habitats in natural wetlands,</i> <i>(3) there is no reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if degraded they are improved, and</i> <i>their flood attenuation capacity is maintained.</i>
FPI035	Wise Response Society	FPI035.012	LF-FW - Freshwater	LF-FW-09	Amend	(2) there is no decrease a steady recovery in the range and diversity of indigenous ecosystem types and habitats in natural wetlands, ... (4) their flood attenuation capacity is steadily improved maintained
FPI037	Fish & Game	FPI037.016	LF-FW - Freshwater	LF-FW-09	Amend	Relief that will protect and restore, or provide for the promotion of restoration, of wetlands that are not considered 'natural'. And amend LF-FW-09: (2) there is no decrease in the range and diversity of <u>habitats and</u> indigenous ecosystem types and habitats in natural wetlands,
FPI038	NZSki Ltd	FPI038.010	LF-FW - Freshwater	LF-FW-09	Amend	Otago's natural wetlands are protected or restored so that: (3) there is no <u>discernible</u> reduction in their ecosystem health, hydrological functioning, extent or water quality, and if degraded they are improved, and
FPI039	Realnz	FPI039.012	LF-FW - Freshwater	LF-FW-09	Amend	Otago's natural wetlands are protected or restored so that: (3) there is no <u>discernible</u> reduction in their ecosystem health, hydrological functioning, extent or water quality, and if degraded they are improved, and
FPI033	Fulton Hogan Ltd	FPI033.003	LF-FW - Freshwater	LF-FW-09	Amend	Objective LF-FW-09 – Natural wetlands, is amended so that reference to “no decrease” or no reduction” in subclauses 2 and 3 is clearly placed in the context of what is to be achieved on a regional scale rather than at an activity scale. LF-FW-09 – Natural wetlands Otago's natural wetlands are protected or restored so that: (1) mahika kai and other mana whenua values are sustained and enhanced now and for future generations,

						<p>(2) there is no <u>net</u> decrease in the range and diversity of indigenous ecosystem types and habitats in<u>of</u> natural wetlands <u>across the region</u>,</p> <p>(3) there is no <u>net</u> reduction in their <u>wetland</u> ecosystem health, hydrological functioning, amenity values, extent or water quality <u>across the region</u>, and if degraded they are <u>it is</u> improved, and</p> <p>(4) their flood attenuation capacity is maintained.</p>
FPI020	Silver Fern Farms Ltd	FPI020.014	LF-FW - Freshwater	LF-FW-09	Amend	Delete LF-FW-09(2) and (3) or amend to ensure that the objective contemplates the grant of resource consents as provided for by the NPSFM and NESF.
FPI027	Contact Energy Limited	FPI027.025	LF-FW - Freshwater	LF-FW-09	Amend	Contact seeks an amendment to the objective that appropriately reflects the exception for specified infrastructure in clause 3.22 of the NPSFM. By way of example, the objective could be amended to include a specific subclause (5) which reflects the process for specified infrastructure set out in the NPSFM,
FPI024	DairyNZ Limited	FPI024.028	LF-FW - Freshwater	LF-FW-09	Amend	Amend as follows: Otago's natural wetlands are protected, or restored <u>if degraded</u> so that: (1) mahika kai and other mana whenua values are sustained and enhanced now and for future generations,
FPI030	Kāi Tahu ki Otago	FPI030.029	LF-FW - Freshwater	LF-FW-09	Amend	Amend as follows: <i>Otago's natural wetlands are protected or restored so that:</i> (1) ... (2) <i>there is no decrease in the range <u>extent</u> and diversity of indigenous ecosystem types and habitats in natural wetlands,</i> (3) <i>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 their flood attenuation <u>and water storage capacity</u> is maintained.</i>
FPI031	Oceana Gold Ltd	FPI031.008	LF-FW - Freshwater	LF-FW-09	Amend	"Otago's natural wetlands are protected, <u>improved</u> or restored so that:" OceanaGold would also like to see further amendments address its concerns
FPI044	Director General of Conservation	FPI044.016	LF-FW - Freshwater	LF-FW-09	Amend	Amend as follows or words to like effect: "Otago's natural wetlands, <u>including ephemeral wetlands</u> , are protected or <u>and</u> restored so that..." AND insert the following new clause or words to like effect: "(5) <u>their provision of habitat for mobile species such as waterfowl and rails is maintained.</u> "

FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.027	LF-FW - Freshwater	LF-FW-O9	Amend	Amend section (1) to provide better clarity on what needs to be enhanced, to what level, what the endpoint of enhancement is. Amend section (2) to provide clarity on what 'the range' means. Amend section (3) to identify an end state for improvement. Also amend (3) to delete the reference to amenity values: 'hydrological functioning, amenity values, extent or water quality...'
FPI021	Ballance Agri-Nutrients Ltd	FPI021.004	LF-FW - Freshwater	LF-FW-O9	Amend	Amend LF-FW-O9 –Natural wetlands as follows: LF-FW-O9 –Natural wetlands Otago's natural wetlands are protected or restored so that: (1) mahika kai and other mana whenua values are sustained and enhanced now and for future generations, (2) there is no minimal decrease in the range extent and diversity of indigenous ecosystem types and habitats in natural wetlands, (3) there is no minimal reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if <u>these have been</u> degraded they are improved, and (4) their flood attenuation capacity is maintained.
FPI046	QLDC	FPI046.010	LF-FW - Freshwater	LF-FW-P7	Support	Retain as notified
FPI019	Fonterra Co-operative Group Ltd	FPI019.008	LF-FW - Freshwater	LF-FW-P7	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.021	LF-FW - Freshwater	LF-FW-P7	Support	Retain as notified.
FPI001	Dunedin City Council	FPI001.018	LF-FW - Freshwater	LF-FW-P7	Support	Retain as notified.
FPI041	McArthur Ridge Vineyard Ltd	FPI041.005	LF-FW – Freshwater	LF-FW-P7	Support	Retain (5) as notified
FPI041	McArthur Ridge Vineyard Ltd	FPI041.006	LF-FW – Freshwater	LF-FW-P7	Support	Retain (6) as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.028	LF-FW - Freshwater	LF-FW-P7	Oppose	Remedy sought is that ORC undertake the relevant and necessary analysis to inform this sort of regulatory instrument. Once this has been done, replace provision with one based on analysis of current state and costs of achievement, and in line with the NPS-FM. Section (5) should also refer to freshwater being allocated efficiently (both quality and quantity) to reflect Policy 11. It would be useful to state a timeframe for the phasing out of over allocation, or align it to the long-term visions, so it is clear that overallocation is not addressed immediately, rather in a structured way. The wording in (6) should be 'limits' in line with the NPS-FM wording. This incorporates limits for quality and take limits for quantity.

FPI035	Wise Response Society	FPI035.013	LF-FW - Freshwater	LF-FW-P7	Amend	(3) <u>the entire length of specified rivers and lakes, and all those in the Upper Lakes Rohe</u> are suitable for primary contact <u>and eutrophication-free</u> within the following timeframes: ... (5) <u>existing over-allocation of both nutrients and water are is phased out by 2035 with milestones of 10%/an</u> and future over-allocation is avoided, and (6) <u>fresh water is allocated within environmental limits and its use and hydrological efficiency is optimised within each catchment by 2040.</u>
FPI037	Fish & Game	FPI037.019	LF-FW - Freshwater	LF-FW-P7	Amend	(1) <u>the health, and well-being and resilience</u> of water bodies is maintained or, if degraded, improved <u>protected and restored</u> , (1a) all activities related to freshwater support the health, well-being and resilience of water bodies, (2) <u>the habitats of indigenous species associated with water bodies are protected and restored</u> , including by providing for fish passage (2a) <u>the habitat of trout and salmon, including fish passage, is protected and restored</u> insofar as it is consistent with (2),... (4) <u>mahika kai, wild harvested food and drinking water are safe for human consumption</u> , (5) <u>existing over-allocation is phased out and future over-allocation is avoided, and</u> (6) <u>fresh water is allocated within environmental limits and used efficiently, and</u> (7) <u>discharges to freshwater are allocated within environmental limits.</u>
FPI043	OWRUG	FPI043.065	LF-FW - Freshwater	LF-FW-P7	Amend	<u>7. Freshwater is used efficiently taking in to account the nature of the waterbody that water is to be taken from and the land-use activity the water will be used for.</u>
FPI045	Forest & Bird	FPI045.016	LF-FW - Freshwater	LF-FW-P7	Amend	(1) <u>the health, resilience, and well-being</u> of water bodies is maintained or, if degraded, improved, ... (5) <u>existing over-allocation is phased out and future over-allocation is avoided, and fresh water is allocated within environmental limits and used efficiently.</u>
FPI026	Federated Farmers of New Zealand	FPI026.030	LF-FW - Freshwater	LF-FW-P7	Amend	Reconsider the appropriateness of the time frames and targets in (3) in line with evidence and s32 analysis.
FPI023	Moutere Station Ltd	FPI023.010	LF-FW - Freshwater	LF-FW-P7	Amend	Amend LF-FW-P7 to: ... (2) <u>the habitats of indigenous species associated with water bodies are protected, including by providing for fish passage</u> ... (5) <u>existing over-allocation [identify particular location] is phased out and future over-allocation is avoided, and reduced based on the [following principles] insofar as it does not have a negative impact on production in the food and fibre sector.</u>

FPI020	Silver Fern Farms Ltd	FPI020.015	LF-FW - Freshwater	LF-FW-P7	Amend	<p>Amend as follows</p> <p>LF-FW-P7 – Fresh water Environmental outcomes, attribute states (including target attribute states) and limits ensure that:</p> <p>(1) the health and well-being of water bodies is maintained or, if degraded, improved,</p> <p>(2) the habitats of indigenous species associated with water bodies are protected, including by providing for fish passage,</p> <p>(3) specified rivers and lakes are suitable for primary contact within the following timeframes:</p> <p>(a) by 2030, 98% of rivers and 98% of lakes, and by 2040, 100% of rivers and 100% of lakes, and</p>
FPI027	Contact Energy Limited	FPI027.026	LF-FW - Freshwater	LF-FW-P7	Amend	<p>Contact seeks amendment to LF-FW-P7 to appropriately recognise, provide for and protect the contribution of freshwater to renewable electricity generation and therefore climate change mitigation; and to recognise that there are practical limitations in respect of the CHS.</p> <p>By way of example only, Contact proposes the following amendments:</p> <p>LF-FW-P7 – Fresh water Environmental outcomes, attribute states (including target attribute states), <u>environmental flows and levels</u>, and limits ensure that:</p> <p>(1) the health and well-being of water bodies is maintained or, if degraded, improved,</p> <p>(2) the habitats of indigenous <u>freshwater</u> species associated with water bodies are protected <u>and sustained</u>, including by providing for fish passage <u>to the extent reasonably practicable</u>,</p> <p>(2A) <u>the habitats of trout and salmon are protected to the extent reasonably practicable, including by providing for fish passage, insofar as protection is consistent with (2).</u></p> <p>(3) specified rivers and lakes are suitable for primary contact within the following timeframes:</p> <p>(4) by 2030, 90% of rivers and 98% of lakes, and</p> <p>(5) by 2040, 95% of rivers and 100% of lakes, and</p> <p>(6) mahika kai <u>mahika kai</u> and drinking water are safe for human consumption,</p> <p>(7) existing over-allocation is phased out and future over-allocation is avoided, and</p> <p>(8) <u>allocation of fresh water is allocated within environmental limits on resource use and used efficiently.</u></p> <p>(9) the role of freshwater management as part of New Zealand’s integrated response to climate change is recognised, <u>provided for and protected, including by protecting the generation capacity, storage and operational flexibility of the nationally significant Clutha Hydro Scheme.</u></p>

FPI024	DairyNZ Limited	FPI024.029	LF-FW - Freshwater	LF-FW-P7	Amend	Amend as follows: (3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 90-80% of rivers and 98% of lakes, and (b) by 2040, 95-90% of rivers and 100% of lakes, and
FPI030	Kāi Tahu ki Otago	FPI030.030	LF-FW - Freshwater	LF-FW-P7	Amend	Amend as follows: <i>Environmental outcomes, attribute states (including target attribute states) states), <u>environmental flows and levels</u>, and limits ensure that:</i> ... <i>the habitats of indigenous species associated with water bodies are protected <u>and sustained</u>, including by providing for fish passage,</i> ... (6) <u>allocation of fresh water is allocated within environmental limits and water is used efficiently.</u>
FPI022	Manawa Energy Ltd	FPI022.006	LF-FW - Freshwater	LF-FW-P7	Amend	Amend clause (2) to read: (2) the habitats of indigenous species associated with water bodies are protected, including by providing for fish passage <u>where appropriate</u> , Insert an additional clause, as clause (5) with associated renumbering of subsequent clauses, as follows: <u>(5) the existing and future generation output of hydroelectric power schemes is recognised, maintained and protected, and</u>
FPI016	Meridian Energy Ltd	FPI016.015	LF-FW - Freshwater	LF-FW-P7	Amend	Amend LF-FW-P7 as follows: <i>“Environmental outcomes, attribute states (including target attribute states) and limits ensure that:</i> (1) ... (2) <i>the habitats of <u>significant</u> indigenous species associated with water bodies are protected, including by providing for fish passage,</i> ...
FPI012	Minister For the Environment	FPI012.006	LF-FW - Freshwater	LF-FW-P7	Amend	Amend LF-FW-P7 – Fresh water to read: “Environmental outcomes, attribute states (including target attribute states), limits, environmental flows and levels ensure that”.
FPI031	Oceana Gold Ltd	FPI031.009	LF-FW - Freshwater	LF-FW-P7	Amend	Environmental outcomes, attribute states (including target attribute states) and limits ensure that:

						(1) the health and well-being of water bodies is maintained or, if degraded, improved, (2) the habitats of <u>significant</u> indigenous species associated with water bodies are <u>maintained and enhanced</u> protected , including by providing for fish passage,
FPI034	The Fuel Companies	FPI034.002	LF-FW - Freshwater	LF-FW-P7	Amend	Amend the policy or include a new policy to ensure that the avoidance pathways for essential temporary construction dewatering takes necessary to facilitate operation, maintenance, upgrade and development of infrastructure in over allocated catchments. Retain the balance of the policy as notified.
FPI007	John Highton	FPI007.064	LF-FW - Freshwater	LF-FW-P7	Amend	Amend to include providing for valued introduced species including protection of their habitat and recognition of their need for migration to maintain healthy populations
FPI017	Ravensdown Ltd	FPI017.010	LF-FW - Freshwater	LF-FW-P7	Amend	Amend Policy LF-FW-P7 as follows: Environmental outcomes, attribute states (including target attribute states), <u>environmental flow and levels</u> , and limits ensure that: ... (3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 98% <u>99%</u> of rivers and 98% <u>99%</u> of lakes, and (b) by 2040, 99% <u>99%</u> of rivers and 100% <u>99%</u> of lakes, and ...
FPI044	Director General of Conservation	FPI044.017	LF-FW - Freshwater	LF-FW-P7	Amend	Amend as follow, or words to like effect: “...6. freshwater is allocated within environmental limits <u>flows and levels</u> and used efficiently.”
FPI047	Horticulture New Zealand	FPI047.023	LF-FW - Freshwater	LF-FW-P7	Amend	Delete LF-FW-P7 or Amend LF-FW-P7 – Fresh water as follows: Environmental outcomes, attribute States (including target attribute states) and limits <u>reflect freshwater values, and where appropriate</u> ensure that: (1)..., (2) the habitats of indigenous species associated with water bodies are <u>maintained and improved</u> protected including by providing for fish passage, (3) ... (4) mahika kai and drinking water are safe for human consumption, (5) ... (6) freshwater is allocated within environmental limits and used efficiently <u>to provide for human health (including drinking water and food security) and wider social, cultural and economic well-being.</u>
FPI021	Ballance Agri-Nutrients Ltd	FPI021.005	LF-FW - Freshwater	LF-FW-P7	Amend	Amend LF-FW-P7 – Fresh water, as follows: LF-FW-P7 –Fresh water Environmental outcomes, attribute states (including target attribute states); <u>environmental flows and levels</u> , and limits <u>are set in consultation with Kāi Tahu and the community to ensure that:</u> (1) the health and well-being of water bodies is maintained or, if degraded, improved, (2) the habitats of indigenous <u>freshwater</u> species associated with water bodies are protected, including by providing for fish passage,

						(3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 90% of rivers and 98% of lakes, and (b) by 2040, 95% of rivers and 100% of lakes, and (4) mahika kai and drinking water are safe for human consumption, (5) existing over-allocation is phased out and future overallocation is avoided, and (6) fresh water is allocated within environmental limits and used efficiently.
FPI009	Central Otago Winegrowers Association	FPI009.008	LF-FW - Freshwater	LF-FW-P7	Amend	Amend LF-FW-P7 –Fresh water as follows: (6) fresh water is allocated within environmental limits and used efficiently. <u>(7) Freshwater is used efficiently taking in to account the nature of the waterbody that water is to be taken from and the land-use activity the water will be used for.</u>
FPI003	New Zealand Defence Force	FPI003.002	LF-FW - Freshwater	LF-FW-P9	Support	Retain as notified
FPI013	Transpower	FPI013.002	LF-FW - Freshwater	LF-FW-P9	Support	Retain as notified
FPI018	Waka Kotahi	FPI018.004	LF-FW - Freshwater	LF-FW-P9	Support	Retain Policy LF-FW-P9 as notified.
FPI001	Dunedin City Council	FPI001.019	LF-FW - Freshwater	LF-FW-P9	Oppose	Remove this policy from the pORPS and include it in the future Land and Water Regional Plan instead.
FPI027	Contact Energy Limited	FPI027.027	LF-FW - Freshwater	LF-FW-P9	Oppose	Contact seeks changes to ensure that the policy accurately reflects the requirements of the NPSFM, the NPSREG and the need to protect existing and provide for new renewable electricity generation as a core part of climate change mitigation. Given the linkages with the other policies to be considered in the Schedule 1 process, we have not sought specific changes at this stage. Contact's position on this policy is dependent on the outcome of other provisions cross-referred to within the policy that are to be considered as part of the Schedule 1 process (including ECO-P3 and ECO-P6). In addition, Contact considers that subclause (2) is inappropriate as it appears to be more restrictive than the effects management hierarchy set out in the NPSFM.
FPI035	Wise Response Society	FPI035.014	LF-FW - Freshwater	LF-FW-P9	Amend	<u>Notwithstanding policy LF-FW- P7</u> P protect natural wetlands by: (a) the loss of values or extent arises from <u>permitted</u> : (i) the customary harvest of food or resources undertaken in accordance with tikaka Māori, ... (iv) the sustainable harvest of sphagnum moss, (v) the construction or maintenance of wetland utility structures, (vi) the maintenance of operation of specific infrastructure, or other infrastructure, (vii) natural hazard works, or ... (ii) the specified infrastructure will provide significant national or regional benefits <u>that are consistent with national emission reduction goals,</u>

						(iii) there is a functional need for the specified infrastructure in that location <u>rather than primarily economic</u> .
FPI037	Fish & Game	FPI037.017	LF-FW - Freshwater	LF-FW-P9	Amend	Relief that will protect and restore, or provide for the promotion of restoration, of wetlands that are not considered 'natural'.
FPI038	NZSki Ltd	FPI038.011	LF-FW - Freshwater	LF-FW-P9	Amend	(vi) the <u>construction</u> , maintenance or operation of specified infrastructure, or other infrastructure, ... (v) other effects of the activity <u>on the loss of values or extent of the natural wetland</u> (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and ... (b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b)(iv) and (1)(b)(v) <u>in respect of any loss of values or extent of the natural wetland</u> .
FPI039	Realnz	FPI039.013	LF-FW - Freshwater	LF-FW-P9	Amend	(vi) the <u>construction</u> , maintenance or operation of specified infrastructure, or other infrastructure, ... (v) other effects of the activity <u>on the loss of values or extent of the natural wetland</u> (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and ... (b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b)(iv) and (1)(b)(v) <u>in respect of any loss of values or extent of the natural wetland</u> .
FPI045	Forest & Bird	FPI045.017	LF-FW - Freshwater	LF-FW-P9	Amend	Amend the introductory words as follows: Protect natural <u>inland</u> wetlands by... Include a definition of "natural inland wetlands" reflecting that contained in the NPSFM 2020.
FPI046	QLDC	FPI046.011	LF-FW - Freshwater	LF-FW-P9	Amend	That a definition of 'restoration' be included, and if not included, that restoration activities be struck from the provision. The following is from the draft National Policy Statement Indigenous Biodiversity <u>Restoration means the active intervention and management of modified or degraded habitats, ecosystems, landforms, and landscapes in order to maintain or reinstate indigenous natural character, ecological and physical processes, and cultural and visual qualities, and may include enhancement activities.</u>

FPI026	Federated Farmers of New Zealand	FPI026.031	LF-FW - Freshwater	LF-FW-P9	Amend	<p>Amend LF-FW-P9 to align more accurately with the NPSFM</p> <p><u>“The loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where:</u></p> <p><u>(a) the loss of extent or values arises from any of the following: (i) the customary harvest of food or resources undertaken in accordance with tikanga Māori</u></p> <p><u>(ii) restoration activities</u></p> <p><u>(iii) scientific research</u></p> <p><u>(iv) the sustainable harvest of sphagnum moss</u></p> <p><u>(v) the construction or maintenance of wetland utility structures (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2012)</u></p> <p><u>(vi) the maintenance or operation of specified infrastructure, or other infrastructure (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2012)</u></p> <p><u>(vii) natural hazard works (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2012); or</u></p> <p><u>(b) the regional council is satisfied that:</u></p> <p><u>(i) the activity is necessary for the construction or upgrade of specified infrastructure; and</u></p> <p><u>(ii) the specified infrastructure will provide significant national or regional benefits; and</u></p> <p><u>(iii) there is a functional need for the specified infrastructure in that location; and</u></p> <p><u>the effects of the activity are managed through applying the effects management hierarchy</u></p>
FPI033	Fulton Hogan Ltd	FPI033.004	LF-FW - Freshwater	LF-FW-P9	Amend	<p>Amend Policy LF-FW-P9 – Protecting natural wetlands to include a consenting pathway for quarrying.</p> <p>LF-FW-P9 – Protecting natural wetlands</p> <p>Protect natural wetlands by:</p> <p>(1) avoiding a reduction in their values or extent unless:</p> <p>(a) the loss of values or extent arises from:</p> <p>(i) the customary harvest of food or resources undertaken in accordance with tikanga Māori,</p> <p>(ii) restoration activities,</p> <p>(iii) scientific research,</p> <p>(iv) the sustainable harvest of sphagnum moss,</p> <p>(v) the construction or maintenance of wetland utility structures,</p> <p>(vi) the maintenance of operation of specific infrastructure, or other infrastructure,</p> <p>(vii) natural hazard works, or</p> <p>(b) the Regional Council is satisfied that:</p>

						<ul style="list-style-type: none"> (i) the activity is necessary for the construction or upgrade of specified infrastructure, (ii) the specified infrastructure will provide significant national or regional benefits, (iii) there is functional need for the specified infrastructure in that location, (iv) the effects of the activity on indigenous biodiversity are managed by applying either ECO-P3, <u>ECO-P4</u>, ECO-P5 or ECO-P6 (whichever is applicable), and (v) the other effects of the activity (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and <u>or</u> <p>(c) <u>the Regional Council is satisfied that:</u></p> <ul style="list-style-type: none"> <u>(i) the activity is for the purpose of expanding an existing, or developing a new, quarry for the extraction of aggregate; and</u> <u>(ii) the extraction of the aggregate will provide significant national or regional benefits; and</u> <u>(iii) there is a functional need for the extraction to be done in that location;</u> <u>(iv) the effects of the activity on indigenous biodiversity are managed by applying either ECO-P3, ECO-P4, ECO-P5 or ECO-P6 (whichever is applicable), and</u> <u>(v) the other effects of the activity (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and or</u> <p>(2) not granting resource consents for activities under (1)(b) <u>or (c)</u> unless the Regional Council is satisfied that:</p> <ul style="list-style-type: none"> (a) the application demonstrates how each step of the effects management hierarchies in (1)(b)(iv) and (1)(b)(v) will be applied to the loss of values or extent of the natural wetland, and (b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b)(iv) and (1)(b)(v).
FPI020	Silver Fern Farms Ltd	FPI020.016	LF-FW - Freshwater	LF-FW-P9	Amend	Delete sub-clause LF-FW-P9 (1)(b)(iv).
FPI030	Kāi Tahu ki Otago	FPI030.031	LF-FW - Freshwater	LF-FW-P9	Amend	<p>Amend as follows:</p> <p><i>Protect natural wetlands by:</i></p> <p><i>(1) avoiding a reduction in their values or extent unless:</i></p> <p><i>(a) the loss of values or extent arises from:</i></p> <p>...</p> <p>(v) ...</p> <p><i>the maintenance of or operation of specific <u>specified</u> infrastructure, or other infrastructure ...</i></p>

FPI022	Manawa Energy Ltd	FPI022.007	LF-FW - Freshwater	LF-FW-P9	Amend	Correct clause (1)(a)(vi) as follows: (vi) the maintenance of and operation of specific specified infrastructure, or other infrastructure,
FPI016	Meridian Energy Ltd	FPI016.016	LF-FW - Freshwater	LF-FW-P9	Amend	Amend LF-FW-P9 (1)(a)(vi) as follows: “(vi) the maintenance of or operation of specific specified infrastructure, or other infrastructure,” Retain (1)(b) as notified.
FPI031	Oceana Gold Ltd	FPI031.010	LF-FW - Freshwater	LF-FW-P9	Amend	Amend the policy to recognise that changes to the NESFW are imminent and provide a broader scope of opportunity for activities such as mining to access the effects management hierarchy.
FPI007	John Highton	FPI007.016	LF-FW - Freshwater	LF-FW-P9	Amend	The complete exclusion of stock in some cases may be counterproductive to the outcomes sought for wetlands.
FPI044	Director General of Conservation	FPI044.018	LF-FW - Freshwater	LF-FW-P9	Amend	Amend as follows, or words to like effect: “(1)(b)(v) the other effects of the activity (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy <u>(in relation to natural wetlands and rivers)</u> , and...”
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.029	LF-FW - Freshwater	LF-FW-P9	Amend	Clarify whether Policy LF-FW-P9 is intended to apply to coastal natural wetlands and amend the wording of LF-FW-P9 to reflect the wording of the NPS-FM (Part 3.22).
FPI041	McArthur Ridge Vineyard Ltd	FPI041.004	LF-FW – Freshwater	LF-FW-O8	Amend	Add a new [clause to the] Objective <u>(6) Innovative, efficient and effective uses of water are enabled in a manner consistent with the hierarchy of obligations in Te Mana o te Wai.</u>
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.024	LF-FW - Freshwater	LF-FW-P10	Support	Retain as notified.
FPI001	Dunedin City Council	FPI001.020	LF-FW - Freshwater	LF-FW-P10	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.032	LF-FW - Freshwater	LF-FW-P10	Support	Retain as notified
FPI035	Wise Response Society	FPI035.015	LF-FW - Freshwater	LF-FW-P10	Amend	Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where <u>technically possible</u> : (1) an increase in the extent and quality of <u>former wetland</u> habitat for indigenous species <u>by 10%/an</u> , (2) the restoration of hydrological <u>and ecological</u> processes, <u>including the steady re-establishment of the original ground and surface water levels.</u>
FPI037	Fish & Game	FPI037.018	LF-FW - Freshwater	LF-FW-P10	Amend	Relief that will protect and restore, or provide for the promotion of restoration, of wetlands that are not considered ‘natural’.

FPI045	Forest & Bird	FPI045.018	LF-FW - Freshwater	LF-FW-P10	Amend	Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible :
FPI046	QLDC	FPI046.012	LF-FW - Freshwater	LF-FW-P10	Amend	Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible (1) control of pest species and vegetation clearance, and (2) the exclusion of stock. <u>And where possible, requiring</u> (3) an increase in the extent and quality <u>quality condition</u> of habitat for indigenous species, (4) the restoration of hydrological processes.
FPI026	Federated Farmers of New Zealand	FPI026.032	LF-FW - Freshwater	LF-FW-P10	Amend	Amend clause (4) as follows (or similar): <i>(4) the exclusion of stock <u>as per the Resource Management (Stock Exclusion) Regulations 2010</u>.</i>
FPI020	Silver Fern Farms Ltd	FPI020.017	LF-FW - Freshwater	LF-FW-P10	Amend	Amend as follows. LF-FW-P10 – Restoring natural wetlands Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring <u>(within an existing wetland or a separate location)</u> , where practicable <u>possible</u> : (1) an increase in the extent and quality of habitat for indigenous species, (2) the restoration of hydrological processes, (3) control of pest species and vegetation clearance, and (4) the exclusion of stock.
FPI027	Contact Energy Limited	FPI027.028	LF-FW - Freshwater	LF-FW-P10	Amend	Contact seeks amendments to the policy that appropriately recognise the specific exception for specified infrastructure as provided in clause 3.22 of the NSPFM and to give effect to the NPSREG.
FPI024	DairyNZ Limited	FPI024.030	LF-FW - Freshwater	LF-FW-P10	Amend	Amend as follows: LF-FW-P10 – Restoring natural wetlands Improve the ecosystem health, <u>and</u> hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible: (1) an increase in the extent and quality of habitat for indigenous species, (2) the restoration of hydrological processes, (3) control of pest species and vegetation clearance, and (4) the exclusion of stock.
FPI022	Manawa Energy Ltd	FPI022.008	LF-FW - Freshwater	LF-FW-P10	Amend	Amend the policy as follows: Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible practicable : ...

FPI031	Oceana Gold Ltd	FPI031.011	LF-FW - Freshwater	LF-FW-P10	Amend	Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible: (1) an increase in the extent and quality of habitat for indigenous species, (2) the restoration of hydrological processes, (3) ...
FPI007	John Highton	FPI007.065	LF-FW - Freshwater	LF-FW-P10	Amend	The complete exclusion of stock in some cases may be counterproductive to the outcomes sought for wetlands.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.043	LF-FW - Freshwater	LF-FW-P10	Amend	Amend the provision to delete 'requiring' and replace it with 'encourage' or 'support'. Qualify sections (1) and (2) to clarify how much increase and restoration is required. Specifically exempt sheep in section (4) or delete the provision. Amend section (4) to reflect the exclusion of stock where that is necessary to enhance values, not as a blanket provision.
FPI035	Wise Response Society	FPI035.016	LF-FW - Freshwater	LF-FW-P15	Amend	(1) except as required by LF-VM-O2 and LF-VM-O4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and (b) where technically possible, all stormwater to be reintegrated with the natural hydrological process (including groundwater recharge) and if this is not possible, discharged into a reticulated system, where one is available, (c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring for reticulated stormwater and wastewater systems, ensure that reticulated stormwater systems have the capacity to manage new weather extremes by introducing appropriate buffering systems and encouraging private rainwater collection within properties for emergency use. (e) stormwater and wastewater discharges to meet <u>or better</u> any applicable water quality standards set for FMUs and/or rohe, and ... (3) promoting the reticulation of stormwater and wastewater in urban areas. ORC is to identify urban centres which might benefit from improved stormwater and wastewater facility and for communities wishing to explore feasibility, ensure that the wider sustainable management and social implications are assessed, including: i) public health issues and potential gains ii) any potential to avoid or contain sprawl that preserves productive land, contains infrastructure costs or preserves pedestrian and cyclist options iii) minimising adverse environmental impact considering the implications of climate change and National emissions reduction policy iv) the potential for better management of the existing arrangement v) alternative collection, management and disposal systems and the potential to deliver useful resource. vi) the cost-of-living and demographic impacts on the current residents vii) the operation and maintenance costs and technical support requirements (4) Where the use of environmentally hazardous substances cannot be entirely avoided, ensure use is essential and actively promote a shift to more benign and biodegradable alternatives
FPI038	NZSki Ltd	FPI038.013	LF-FW - Freshwater	LF-FW-P15	Amend	(a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, <u>unless alternative treatment and disposal methods will result in improved environmental outcomes.</u>

FPI039	Realnz	FPI039.015	LF-FW - Freshwater	LF-FW-P15	Amend	(a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, <u>unless alternative treatment and disposal methods will result in improved environmental outcomes.</u>
FPI045	Forest & Bird	FPI045.019	LF-FW - Freshwater	LF-FW-P15	Amend	Minimise <u>Avoid</u> the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by: 1. except as required by LF-VM-O2 and LF-VM-O4, preferring <u>require</u> discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and ... 3. promoting <u>providing for</u> the reticulation of stormwater and wastewater in urban areas
FPI046	QLDC	FPI046.013	LF-FW - Freshwater	LF-FW-P15	Amend	3) promoting <u>requiring, where practicable,</u> the reticulation of stormwater and wastewater in urban areas
FPI019	Fonterra Co-operative Group Ltd	FPI019.009	LF-FW - Freshwater	LF-FW-P15	Amend	Delete LF-FW-P15 and replace as follows: <i>LF-FW-P15 – Stormwater and wastewater industrial and trade waste discharges</i> <i>Minimise the adverse effects of direct and indirect discharges of stormwater and industrial and trade waste wastewater to fresh water by:</i> <i>(1) except as required by LF-VM-O2 and LF-VMO4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and</i> <i>(2) requiring:</i> <i>(a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available,</i> <i>(b) all stormwater and <u>industrial and trade waste</u> to be discharged into a reticulated system, where one is <u>made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u></i> <i>(c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring for into reticulated stormwater and wastewater-systems,</i> <i>(d) on-site wastewater systems to be designed and operated in accordance with best practice standards,</i> <i>(e) stormwater and wastewater that discharges to meet any applicable water quality standards <u>environmental outcomes set for FMUs and/or rohe, and</u></i> <i>(f) the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and</i> <i>(3) promoting the reticulation of stormwater and wastewater in urban areas, and</i> <i>(4) <u>promoting source control as a method for reducing contaminants in discharges of stormwater and industrial and trade waste.</u></i>

						<p><u>LF-FW-P15A – Discharges containing sewage and other human wastes</u></p> <p><u>Avoid the adverse effects of direct and indirect discharges containing sewage and other human wastes (including cremated ashes) to fresh water by:</u></p> <p><u>(1) requiring new discharges containing sewage or other human wastes to be to land, unless adverse effects associated with a discharge to land are demonstrably greater than a discharge to fresh water, and</u></p> <p><u>(2) requiring:</u></p> <p><u>(a) that all discharges containing sewage or other human wastes are discharged into a reticulated wastewater 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>(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 to be designed and operated in accordance with best practice standards,</u></p> <p><u>(d) that discharges meet any applicable environmental outcomes set for FMUs and/or rohe, and</u></p> <p><u>(3) promoting the reticulation of wastewater in urban areas, and promoting source control as a method for reducing contaminants in discharges containing sewage and other human wastes.</u></p>
FPI020	Silver Fern Farms Ltd	FPI020.018	LF-FW - Freshwater	LF-FW-P15	Amend	<p>Amend to:</p> <ul style="list-style-type: none"> ➤ Enable discharges to be managed outside of the reticulated network if an alternative management method is environmentally neutral or positive compared to reliance on the reticulated network. <p>Clarify the reference to “water quality standards” for discharges in LF-FW-P15(2)(e).</p>
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.025	LF-FW - Freshwater	LF-FW-P15	Amend	<p>Amend as follows:</p> <p>Minimise <u>Avoid</u> the adverse effects of direct and indirect discharges of stormwater, and wastewater and human wastes (including cremated ashes) to fresh water by:</p> <p><u>(X) phasing out direct wastewater discharges to water, and</u></p> <p>(1) except as required by LF-VM-O2 and LF-VM-O4, preferring <u>requiring new discharges of wastewater or other human wastes to be to land over discharges to water, unless adverse effects associated with a discharge to land are demonstrably greater than a discharge to water,</u></p> <p>...</p> <p><u>(2) requiring:</u></p> <p>...</p> <p><u>(d) on-site wastewater systems and stormwater management to be designed and operated in accordance with best practice standards, ...</u></p> <p>Or alternative wording to address the issues raised.</p>

FPI001	Dunedin City Council	FPI001.021	LF-FW - Freshwater	LF-FW-P15	Amend	<p>Retain and amend policy LF-FW-P15 to address the effects of stormwater discharges only.</p> <p>Duplicate policy LF-FW-P15 to create a new policy LF-FW-P15A, and amend wording accordingly to address the effects of wastewater discharges (including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent).</p>
FPI001	Dunedin City Council	FPI001.022	LF-FW - Freshwater	LF-FW-P15	Amend	<p>LF-FW-P15(1) – For proposed policy LF-FW-P15 (stormwater discharges):</p> <p>Delete (1), as it does not relate to stormwater discharges.</p> <p>For proposed policy LF-FW-P15A (wastewater discharges, including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent):</p> <p>Amend clause (1) to read “... preferring discharges of wastewater to land over discharges to <i>freshwater</i>...”</p>
FPI001	Dunedin City Council	FPI001.023	LF-FW - Freshwater	LF-FW-P15	Amend	<p>LF-FW-P15 (2)(a) and (2) (b) – For proposed policy LF-FW-P15 (stormwater discharges):</p> <p>Delete (2) (a) as it does not relate to stormwater discharges.</p> <p>Amend (2) (b) to “all <i>stormwater</i> to be <i>discharged</i> into a reticulated system, where one is made available <u>by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u>”</p> <p>For proposed policy LF-FW-P15A (wastewater discharges, including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent):</p> <p>Amend (2) (a) to “all <i>wastewater</i> to be <i>discharged</i> into a reticulated system, where one is made available <u>by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u>”</p> <p>Delete (2) (b) as it does not relate to wastewater discharges.</p>
FPI001	Dunedin City Council	FPI001.024	LF-FW - Freshwater	LF-FW-P15	Amend	<p>LF-FW-P15 (2) (c) – For proposed policy LF-FW-P15 (stormwater discharges):</p> <p>Delete (2) (c) as it does not relate to stormwater discharges.</p> <p>For proposed policy LF-FW-P15A (wastewater discharges, including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent):</p>

						Amend (2) (c) to: “implementation of <u>appropriate</u> methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring into <u>from</u> reticulated <i>wastewater</i> systems,”
FPI001	Dunedin City Council	FPI001.025	LF-FW - Freshwater	LF-FW-P15	Amend	<p>LF-FW-P15 (2) (d) – For proposed policy LF-FW-P15 (stormwater discharges):</p> <p>Delete (2) (d) as it does not relate to stormwater discharges.</p> <p>For proposed policy LF-FW-P15A (wastewater discharges, including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent):</p> <p>Retain 2(d) as notified.</p>
FPI001	Dunedin City Council	FPI001.026	LF-FW - Freshwater	LF-FW-P15	Amend	<p>LF-FW-P15(2)(e) – For proposed policy LF-FW-P15 (stormwater discharges):</p> <p>Amend (2)(e) to: “stormwater and wastewater discharges to meet any applicable water quality standards <u>applicable to those discharges</u> set for <i>FMUs</i> and/or rohe”</p> <p>For proposed policy LF-FW-P15A (wastewater discharges, including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent):</p> <p>Amend (2)(e) to: “stormwater and wastewater discharges to meet any applicable water quality standards <u>applicable to those discharges</u> set for <i>FMUs</i> and/or rohe”</p>
FPI001	Dunedin City Council	FPI001.027	LF-FW - Freshwater	LF-FW-P15	Amend	<p>LF-FW-P15(2)(f) – For proposed policy LF-FW-P15 (stormwater discharges):</p> <p>Amend (2)(f) by moving it to separate clause and replacing ‘requiring’ with ‘promoting’.</p> <p>Amend to “Wherever practicable <u>and beneficial</u>”</p> <p>Amend to include a definition of ‘water sensitive urban design’ within the pORPS to promote greater clarity.</p> <p>(f) the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of <i>contaminants</i> on receiving <i>water bodies</i> from the <i>subdivision</i>, use or development of <i>land</i>, wherever practicable, <u>and beneficial</u>, and”</p> <p>For proposed policy LF-FW-P15A (wastewater discharges, including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent):</p> <p>Delete (2) (f) as it does not relate to wastewater discharges.</p>

FPI027	Contact Energy Limited	FPI027.029	LF-FW - Freshwater	LF-FW-P15	Amend	Contact seeks amendments to LF-FW-P15 to make clear that the policy applies to urban stormwater only.
FPI030	Kāi Tahu ki Otago	FPI030.033	LF-FW - Freshwater	LF-FW-P15	Amend	<p>Replace with two policies as follows:</p> <p><u>LF-FW-P15 – Discharges containing animal effluent, sewage and other human wastes, and industrial and trade waste</u></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 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>(a) <u>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>(b) <u>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>(c) <u>on-site wastewater systems and animal effluent systems to be designed and operated in accordance with best practice standards,</u></p> <p>(d) <u>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><u>LF-FW-P15A – Stormwater discharges</u></p> <p><u>Minimise the adverse effects of direct and indirect discharges of stormwater to fresh water by:</u></p> <p>(1) <u>requiring:</u></p> <p>(a) <u>integrated catchment management plans for management of stormwater in urban areas,</u></p> <p>(b) <u>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>(c) <u>consideration of the use of on-site systems to attenuate flow and filter stormwater prior to discharge into any reticulated system,</u></p> <p>(d) <u>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><i>(e) on-site stormwater management systems to be in accordance with best practice standards,</i></p> <p><i>(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,</i></p> <p><i>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</i></p> <p><i>(3) promoting source control as a method for reducing contaminants in discharges of stormwater</i></p>
FPI031	Oceana Gold Ltd	FPI031.012	LF-FW - Freshwater	LF-FW-P15	Amend	It is unclear whether this policy is intended to apply to industrial discharges which contain contaminants, but may or may not be mixed with stormwater or waste water. To the extent that it does apply to industrial discharges, OceanaGold requests amendments which recognise that there may be functional or locational constraints or other reasons of practicability as to why industrial discharges may be made to water, and to allow for direct irrigation to land with nitrate or sulphate rich water.
FPI034	The Fuel Companies	FPI034.003	LF-FW - Freshwater	LF-FW-P15	Amend	<p>Add the following to promote source control and recognise the role of industry good practise:</p> <p><u>4. promoting awareness and actions to reduce contaminant discharges through source control</u></p> <p><u>5. recognising the role of relevant industry guidelines</u></p> <p>Retain the balance of the policy as notified</p>
FPI013	Transpower	FPI013.003	LF-FW - Freshwater	LF-FW-P15	Amend	<p>Amend Policy LF-FW-P15 as follows:</p> <p><i>“Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by: ...</i></p> <p><i>2. requiring:</i></p> <p><i>a. all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available,</i></p> <p><i>b. all stormwater to be discharged into a reticulated system, where one is available,</i></p> <p><i>c. implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring for reticulated stormwater and wastewater systems,</i></p> <p><i>d. on-site wastewater systems to be designed and operated in accordance with best practice standards,</i></p> <p><i>e. stormwater and wastewater discharges to meet any applicable water quality standards set for FMUs and/or rohe, and</i></p> <p><i>f. the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and</i></p> <p><i>...</i></p> <p><i>x. except that (2) does not apply to nationally significant infrastructure where the adverse effects of direct and indirect discharges of stormwater and wastewater are appropriately managed.”</i></p>

FPI018	Waka Kotahi	FPI018.005	LF-FW - Freshwater	LF-FW-P15	Amend	Amend Policy LF-FW-P15 to state that regionally and nationally significant infrastructure should be dealt with under Chapter 11 – Energy, Infrastructure and Transport, as follows: “Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by: ... (2) requiring: (b) all stormwater to be discharged into a reticulated system, where one is <u>practically made available</u>”
FPI017	Ravensdown Ltd	FPI017.011	LF-FW - Freshwater	LF-FW-P15	Amend	Amend Policy LF-FW-P15 as follows: Policy LF-FW-P15 – Stormwater and wastewater discharges. Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by: (1) except as required by LF-VM-O2 and LF-VM-O4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and (2) requiring: (a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, (b) all stormwater to be discharged into a reticulated system, where one is <u>made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u> (c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring <u>for into</u> reticulated stormwater and wastewater systems, (d) on-site wastewater systems to be designed and operated in accordance with best practice standards, (e) <u>that any stormwater and wastewater discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe, and</u> (f) the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and (3) <u>promoting the reticulation of stormwater and wastewater in urban areas, and promoting source control as a method for reducing contaminants in discharges of stormwater.</u>
FPI017	Ravensdown Ltd	FPI017.003	LF-FW - Freshwater	LF-FW-P15	Amend	<u>Policy LF-FW-P15A –Discharges containing animal effluent, sewage and other human wastes, and industrial and trade waste.</u> <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> (1) <u>requiring new discharges containing sewage or other human wastes, or industrial and trade waste to be to land, unless adverse effects associated with a discharge to land are demonstrably greater than a discharge to fresh water,</u>

						<p><u>(1A) requiring discharges containing animal effluent to be to land,</u></p> <p><u>(2) requiring:</u></p> <p>(a) <u>that all discharges containing sewage, other human wastes or industrial and trade waste are discharged into a reticulated wastewater system, where one is made available by its owner, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u></p> <p>(b) <u>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>(c) <u>on-site wastewater systems and animal effluent systems to be designed and operated in accordance with best practice standards,</u></p> <p>(d) <u>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>(3) promoting the reticulation of wastewater in urban areas, and promoting source control as a method for reducing contaminants in discharges containing sewage, other human wastes or industrial and trade waste.</u></p>
FPI044	Director General of Conservation	FPI044.019	LF-FW - Freshwater	LF-FW-P15	Amend	Amend by separating into two policies - one specific to wastewater and one specific to stormwater – and review to ensure that the effects of these two types of discharges are both adequately addressed.
FPI047	Horticulture New Zealand	FPI047.024	LF-FW - Freshwater	LF-FW-P15	Amend	Amend LF-FW-P15 – Regional plans as follows: g) <u>The use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects on the productivity of primary production on highly productive land related to the cumulative impacts of contaminants on receiving water bodies from the subdivision, use or development of land wherever practicable</u>
FPI044	Director General of Conservation	FPI044.020	LF-FW - Freshwater	LF-FW-M6	Support	Retain as notified, except where revisions are required for consistency with other submission points.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.030	LF-FW - Freshwater	LF-FW-M6	Oppose	Delete the provision and replace it with a policy which links back to achieving Te Mana o te Wai and to achieving the long-term visions for each FMU.
FPI041	McArthur Ridge Vineyard Ltd	FPI041.009	LF-FW – Freshwater	LF-FW-M6	Amend	Add a new clause <u>3A Enable innovative, efficient and effective uses of water in a manner consistent with the principles and hierarchy of obligations in Te Mana o te Wai.</u>
FPI041	McArthur Ridge Vineyard Ltd	FPI041.010	LF-FW – Freshwater	LF-FW-M6	Amend	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: 5. include limits on resource use that: 4... b. for water bodies that have been identified as over-allocated, provide methods and timeframes for phasing out that over-allocation <u>that optimise reliability of primary allocation, with priority given to water uses that generally:</u> <u>(i) have a small environmental footprint in terms of greenhouse gas emissions, nutrient loss, sediment loss and microbial contaminant loss;</u>

						<p><u>(ii) use less water per hectare than other uses;</u> <u>(iii) provide greater economic return and associated employment per volume of water used;</u> <u>(iv) are able to use less water at times that coincide with seasonal low flows...</u></p>
FPI035	Wise Response Society	FPI035.017	LF-FW - Freshwater	LF-FW-M6	Amend	<p>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai <u>by the specified timeframes</u> and provide for: <u>(a) a variable presumptive flow regime above a minimum flow or level for each water body the behaviours of the water body, including a base flow or level that provides for variability;</u> ... (c) the needs of <u>all</u> indigenous fauna, including taoka species, and aquatic species associated with the water body, (d) the <u>essential need</u> for hydrological connection with other water bodies, estuaries and coastal margins <u>for sustainable resource management,</u> ... (d) <u>avoid or minimise manage</u> the adverse effects on water bodies that can arise from the use and development of land, and (7) identify and manage natural wetlands in accordance with LF-FW-P7, LF-FW-P8, and LF-FW-P9, and LF-FW P10 while recognising that some activities in and around natural wetlands are managed under the NESF, and ... <u>(9) actively promote low impact regenerative land use practice that maximises carbon sequestration, maximises water harvest in soils, aquifers and hence baseflow to rivers, minimises the need for supplementary nutrient and promotes catchment level planning to maximise community resilience.</u></p>
FPI036	Otago forestry companies	FPI036.003	LF-FW - Freshwater	LF-FW-M6	Amend	<p>Insert after the word “NES-F” <u>and the NES-PF.</u> ... Insert after clause (8): <u>The NES-PF provisions must be applied by regional councils unless it is determined that a more stringent rule is necessary to achieve a freshwater objective under the NES-FM.</u></p>
FPI037	Fish & Game	FPI037.063	LF-FW - Freshwater	LF-FW-M6	Amend	<p><u>(4)(g) human amenity and well-being through protecting and enhancing access to, and recreational use, of water bodies, and</u> ... (5)(d) manage the adverse effects on water bodies that can arise from the use and development of land, and <u>(5)(e) will enable activities to support the health, well-being and resilience of water bodies when operating within limits, and</u></p>
FPI038	NZSki Ltd	FPI038.014	LF-FW - Freshwater	LF-FW-M6	Amend	<p>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai and provide for: ... <u>(b) human wellbeing through protecting and enhancing people’s ability to access waterbodies and use water to support outdoor recreation activities, and</u></p>

FPI039	Realnz	FPI039.016	LF-FW - Freshwater	LF-FW-M6	Amend	(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai and provide for: ... <u>(b) human wellbeing through protecting and enhancing people's ability to access waterbodies and use water to support outdoor recreation activities, and</u>
FPI043	OWRUG	FPI043.069	LF-FW - Freshwater	LF-FW-M6	Amend	Amend to refer of onstream storage also.
FPI020	Silver Fern Farms Ltd	FPI020.020	LF-FW - Freshwater	LF-FW-M6	Amend	Retain LF-FW-M6(6). Make consequential amendments to the references in LF-FW-M6(6)(b), LF-FW-M6(7) and LF-FW-M6(8) to other LF-FW provisions in accordance with this submission.
FPI001	Dunedin City Council	FPI001.028	LF-FW - Freshwater	LF-FW-M6	Amend	Amend LF-FW-M6(3) to: " identify water bodies that are over-allocated in terms of either their water quality or quantity. "
FPI001	Dunedin City Council	FPI001.031	LF-FW - Freshwater	LF-FW-M6	Amend	LF-FW-M6(5)(a) – Amend by replacing 'drinking water' with 'community drinking water supply'. Consider further amendments to address issues raised.
FPI001	Dunedin City Council	FPI001.032	LF-FW - Freshwater	LF-FW-M6	Amend	LF-FW-M6(6) – Regional plans Amend by adding a definition of 'off-stream storage of surface water'.
FPI001	Dunedin City Council	FPI001.033	LF-FW - Freshwater	LF-FW-M6	Amend	LF-FW-M6(7) – District plans Amend for consistency with other requested changes in this submission.
FPI001	Dunedin City Council	FPI001.034	LF-FW - Freshwater	LF-FW-M6	Amend	LF-FW-M6(8) – Action plans Amend for consistency with other requested changes in this submission.
FPI027	Contact Energy Limited	FPI027.030	LF-FW - Freshwater	LF-FW-M6	Amend	Contact requests that this method is amended to reflect the other amendments requested to the LF-FW Chapter set out above, and include specific reference to clause 3.31 of the NPSFM.
FPI030	Kāi Tahu ki Otago	FPI030.034	LF-FW - Freshwater	LF-FW-M6	Amend	Amend as follows: <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> (1) ... (2) ... (3) <i>identify water bodies that are over-allocated in terms of either their water quality or quantity,</i> (4) <i>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> (a) <i>the <u>natural behaviours of the water body including a base flow or level that provides for variability,</u></i> (b) ...

						<p>(c) ...</p> <p>(d) the hydrological connection with other water bodies, <u>wetlands, estuaries and coastal margins,</u></p> <p>(e) ...</p> <p>...</p> <p>(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></p> <p>(a) differentiate between types of uses, including drinking water, and social, cultural and economic uses, in order to provide longterm certainty in relation to <u>about the availability of water for those uses of available water,</u></p> <p>(b) for water bodies that have been identified as over-allocated, provide methods and timeframes for phasing out that overallocation <u>within the timeframes required to achieve the vision for the Freshwater Management Unit set out in the LF-VM objectives,</u></p> <p>(c) ...</p> <p>(d) ... (6) ...</p> <p>(7) ...</p> <p><u>(X) recognise and respond to Kāi Tahu cultural and spiritual concerns about mixing of water between different catchments, and ...</u></p> <p>(8) ...</p>
FPI022	Manawa Energy Ltd	FPI022.009	LF-FW - Freshwater	LF-FW-M6	Amend	<p>Amend clauses (4) and (5) as follows:</p> <p>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai and provide for:</p> <p>...</p> <p>(f) community drinking water supplies, and</p> <p>(g) <u>the generation of hydroelectricity, and</u></p> <p>(5) include limits on resource use that:</p> <p>(a) differentiate between types of uses, including drinking water, <u>water for renewable electricity generation,</u> and social, cultural and economic uses, in order to provide long-term certainty in relation to those uses of available water,</p> <p>...</p> <p>(c) control the effects of <u>enable</u> existing and potential future development <u>where the effects of this</u> on the ability of the water body to meet, or continue to meet, environmental outcomes <u>are managed in accordance with the effects management hierarchy,</u> ...</p>
FPI016	Meridian Energy Ltd	FPI016.017	LF-FW - Freshwater	LF-FW-M6	Amend	<p>Amend LF-FW-M6 (6) as follows:</p> <p><i>provide for the off-stream storage of surface water where storage will:</i></p> <p>(a) support Te Mana o te Wai,</p> <p>(b) <i>give effect to the objectives and policies of the LF chapter of this RPS, and</i></p>

						not prevent a surface water body from achieving identified environmental outcomes and remaining within any limits on resource use, and
FPI012	Minister For the Environment	FPI012.007	LF-FW - Freshwater	LF-FW-M6	Amend	Amend LF-FW-M6 – Regional plans to clarify that environmental flows and levels can be used to phase out over-allocation together and as part of limits.
FPI034	The Fuel Companies	FPI034.004	LF-FW - Freshwater	LF-FW-M6	Amend	Add the following to LF-FW-M6 <u>Promote awareness and actions to reduce contaminant discharges through source control.</u> Retain the balance of the method as notified.
FPI007	John Highton	FPI007.017	LF-FW - Freshwater	LF-FW-M6	Amend	Amend LF-FW-M6(6) to include undertake planning on forms of water storage and how this will interact with Te Mana o te Wai.
FPI014	Rayonier Matariki Forests	FPI014.003	LF-FW - Freshwater	LF-FW-M6	Amend	In LF-FW-M6(7), insert after the word “NESF” “and the NES-PF”
FPI047	Horticulture New Zealand	FPI047.025	LF-FW - Freshwater	LF-FW-M6	Amend	Amend LF-FW-M6 – Regional plans as follows: ... (4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai and provide for: ... <u>g. abstraction and discharges to support domestic food security, and</u> ... (5) include limits on resource use that: a. differentiate between types of uses, including <u>human health needs (such as drinking water and food security)</u> , and social, cultural and economic uses, in order to provide long-term certainty in relation to those uses of available water, ... (6) provide for the off-stream storage of surface water where storage will: (a)...
FPI009	Central Otago Winegrowers Association	FPI009.009	LF-FW - Freshwater	LF-FW-M6	Amend	Support LF-FW-M6(5) –Regional plans or amend to support water take and use for viticulture activities. As further relief, amend to provide a mechanism for consideration of Freshwater Farm Plans using Sustainable Winegrowing New Zealand data.
FPI035	Wise Response Society	FPI035.018	LF-FW - Freshwater	LF-FW-M7	Amend	(2) include provisions to avoid the adverse effects of activities on the significant and outstanding values of outstanding water bodies <u>and associated values,</u> (3) require, wherever practicable, the adoption of water <u>hydrologically and ecologically</u> sensitive urban design techniques when managing the subdivision, use or development of land, and ... (c) promote <u>encourage</u> on-site storage of rainfall <u>in soil, wetlands and reservoirs</u> to detain peak stormwater flows, and ...

						<p><u>(5) actively promote low impact regenerative land use practice that maximises carbon sequestration, maximises water harvest in soils, aquifers and hence baseflow to rivers, minimises the need for supplementary nutrient and promotes catchment level planning to maximise community resilience.</u></p> <p><u>(6) Give practical effect to all the relevant freshwater policies</u></p>
FPI037	Fish & Game	FPI037.020	LF-FW - Freshwater	LF-FW-M7	Amend	<p>...</p> <p>require, wherever practicable, the adoption of water sensitive urban design techniques when managing the <u>existing</u> subdivision, use or development of land <u>in urban areas</u>,</p> <p><u>(3a) require the adoption of water sensitive urban design techniques when managing new subdivision, use or development of land in urban areas</u>, and</p> <p>...</p>
FPI038	NZSki Ltd	FPI038.015	LF-FW - Freshwater	LF-FW-M7	Amend	<p>(2) include provisions to avoid, <u>remedy or mitigate</u> the adverse effects of activities on the significant and outstanding values of outstanding water bodies,</p> <p>(3) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the subdivision, use or development of <u>urban</u>, and</p>
FPI039	Realnz	FPI039.017	LF-FW - Freshwater	LF-FW-M7	Amend	<p>(2) include provisions to avoid, <u>remedy or mitigate</u> the adverse effects of activities on the significant and outstanding values of outstanding water bodies,</p> <p>(3) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the subdivision, use or development of <u>urban</u>, and</p>
FPI026	Federated Farmers of New Zealand	FPI026.033	LF-FW - Freshwater	LF-FW-M7	Amend	<p>Amend LF-FW-M7 as follows:</p> <p><i>(6) provide for the off-stream <u>and in-stream</u> storage of surface water where storage will.....</i></p>
FPI020	Silver Fern Farms Ltd	FPI020.021	LF-FW - Freshwater	LF-FW-M7	Amend	<p>Amend as follows:</p> <p>LF-FW-M7 – District plans</p> <p>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</p> <p>(1) map outstanding water bodies and identify their outstanding and significant values using the information gathered by Otago Regional Council in LF-FW-M5, and</p> <p>(2) include provisions to <u>protect the values of outstanding water bodies from the adverse effects of inappropriate</u> avoid activities on the significant and outstanding values of outstanding water bodies,</p>
FPI001	Dunedin City Council	FPI001.035	LF-FW - Freshwater	LF-FW-M7	Amend	<p>LF-FW-M7(3) – District plans</p> <p>Amend the timeframe to provide flexibility for issues outside the control of territorial authorities.</p> <p>Amend by replacing ‘require’ with ‘promote’.</p> <p>Amend to “Wherever practicable <u>and beneficial</u>”.</p>

FPI001	Dunedin City Council	FPI001.037	LF-FW - Freshwater	LF-FW-M7	Amend	LF-FW-M7(4) – District Plans Amend (4)(a) to “minimise the load of contaminants carried by stormwater needing off-site disposal”. Amend by adding “where appropriate” to end of (4)(c). Amend (4)(d) to “control the area of impermeable surfaces where necessary”.
FPI027	Contact Energy Limited	FPI027.031	LF-FW - Freshwater	LF-FW-M7	Amend	Contact seeks amendments to clauses (2) and (2A). By way of example only, Contact seeks that clause (2) is amended to require that adverse effects on values are "avoided or minimised", and in the context of any outstanding water bodies within the Clutha Hydro Scheme, only to the extent reasonably practicable given the NPSFM direction to provide for the generation capacity, storage and operational flexibility of the scheme. In respect of clause (2A), Contact seeks amendments to make clear that natural character in respect of the lakes and rivers associated with the Clutha Hydro Scheme can only be preserved to the extent reasonably practicable.
FPI030	Kāi Tahu ki Otago	FPI030.035	LF-FW - Freshwater	LF-FW-M7	Amend	Retain as notified but add the following new clause: <i>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</i> ... <i>(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, ...</i>
FPI016	Meridian Energy Ltd	FPI016.019	LF-FW - Freshwater	LF-FW-M7	Amend	Amend LF-FW-M7 as follows: <i>“Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</i> <i>(1) map outstanding water bodies and identify their outstanding and significant values ... and</i> <i>(2) include provisions to avoid the adverse effects of activities on the significant and outstanding values of outstanding water bodies,</i> ...
FPI034	The Fuel Companies	FPI034.005	LF-FW - Freshwater	LF-FW-M7	Amend	Direct network operators to accept discharges to networks, where they are permitted under the regional plan or compliant with a relevant discharge consent. Retain the balance of the method as notified.
FPI018	Waka Kotahi	FPI018.006	LF-FW - Freshwater	LF-FW-M7	Amend	Amend Method LF-FW-M7 as follows: <i>“Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</i> ...

						<i>(2) include provisions to avoid the adverse effects of activities on the significant and outstanding values of outstanding water bodies, <u>except for regionally and nationally significant infrastructure that have a functional or operational need to be located there.</u></i>
FPI017	Ravensdown Ltd	FPI017.012	LF-FW - Freshwater	LF-FW-M7	Amend	Amend Method LF-FW-M7 as follows: <i>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</i> ... <i>(4) ...</i> <i>(a) ...</i> <i>(b) ...,</i> <i>(c) encourage on-site storage of rainfall to detain peak stormwater flows <u>where appropriate and,</u></i> ...
FPI044	Director General of Conservation	FPI044.021	LF-FW - Freshwater	LF-FW-M7	Amend	Retain as notified, except where revisions are required for consistency with other submission points. AND insert the following additional clause, or words to like effect: <i><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></i>
FPI047	Horticulture New Zealand	FPI047.026	LF-FW - Freshwater	LF-FW-M7	Amend	Amend LF-FW-M7 as follows: include provisions to <u>protect the</u> avoid the adverse effect of activities on the significant and outstanding values of outstanding water bodies
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.031	LF-FW - Freshwater	LF-FW-M7	Amend	Amend the method to include provisions that address all adverse effects of urban development, including providing for drinking water, wastewater treatment, and effects of earthworks on waterbodies. Amend (2) so it is more consistent with Policy 8 NPS-FM and to address only those effects necessary, similar to the submission on LF-FW-M5 above. Amend (3) ensure stormwater can be managed in a way that is consistent with achieving the long-term vision in all cases.
FPI046	QLDC	FPI046.014	LF-FW - Freshwater	LF-FW-M8	Support	Retain as notified
FPI030	Kāi Tahu ki Otago	FPI030.036	LF-FW - Freshwater	LF-FW-M8	Support	Retain as notified
FPI024	DairyNZ Limited	FPI024.031	LF-FW - Freshwater	LF-FW-M8	Oppose	We seek that LF-FW-M8 is deleted.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.032	LF-FW - Freshwater	LF-FW-M8	Oppose	Please provide more certainty about the process and how ORC will consult with community, about options and costs for example.

FPI027	Contact Energy Limited	FPI027.032	LF-FW - Freshwater	LF-FW-M8	Amend	Contact seeks amendments to the method to record that consideration of clause 3.31 of the NPSFM should be part of developing the action plan.
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.033	LF-FW - Freshwater	LF-FW-E3	Amend	<p>Amend paragraph 2 and paragraph 5, as necessary to reflect any amendments made to address 2021 Submission Point 24, in summary, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>
FPI020	Silver Fern Farms Ltd	FPI020.022	LF-FW - Freshwater	LF-FW-E3 (para 2)	Amend	Amend the explanation along with other provisions, to ensure the PORPS gives effect to and accords with, the higher-order NPSFM - as required by RMA s61(1)(da) and s62(3).
FPI027	Contact Energy Limited	FPI027.033	LF-FW - Freshwater	LF-FW-E3 (para 2)	Amend	Contact seeks amendments to reflect the specific treatment of specified infrastructure within the NPSFM.
FPI024	DairyNZ Limited	FPI024.032	LF-FW - Freshwater	LF-FW-E3 (para 2)	Amend	<p>Amend as follows:</p> <p>While the NPSFM requires promotion of the restoration of natural inland wetlands, the policies in this section take a stronger stance, requiring improvement where natural wetlands have been degraded or lost. This is because of the importance of restoration to Kāi Tahu and in recognition of the historic loss of wetlands in Otago.</p>
FPI030	Kāi Tahu ki Otago	FPI030.037	LF-FW - Freshwater	LF-FW-E3 (para 2)	Amend	<p>Amend as follows:</p> <p>Paragraph 2, 3rd sentence:</p> <p><i>... This reflects the views of takata <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>

FPI027	Contact Energy Limited	FPI027.034	LF-FW - Freshwater	LF-FW-E3 (para 5)	Amend	Contact seeks amendments to reflect the specific treatment of specified infrastructure within the NPSFM.
FPI024	DairyNZ Limited	FPI024.033	LF-FW - Freshwater	LF-FW-E3 (para 5)	Amend	Amend as follows: While the NPSFM requires promotion of the restoration of natural inland wetlands, the policies in this section take a stronger stance, requiring improvement where natural wetlands have been degraded or lost. This is because of the importance of restoration to Kāi Tahu and in recognition of the historic loss of wetlands in Otago.
FPI027	Contact Energy Limited	FPI027.035	LF-FW - Freshwater	LF-FW-PR3	Amend	Contact seeks amendments to the reasons to reflect the importance of the Clutha Hydro Scheme, and renewable electricity generation as explained. For example, the principal reasons could be amended to include the following statement: Otago's water bodies make a significant and important contribution to New Zealand's renewable electricity generation, including through the nationally significant Clutha Hydro Scheme. In order to protect this contribution, it is essential that the provisions recognise, provide for and protect this essential infrastructure, which forms a core part of climate change mitigation.
FPI030	Kāi Tahu ki Otago	FPI030.038	LF-FW - Freshwater	LF-FW-PR3	Amend	Amend as follows: Paragraph 1, final sentence: <i>The legacy of Otago's historical mining privileges, coupled with contemporary urban and rural land uses, contribute to ongoing water quality and quantity issues in some water bodies, with significant cultural effects.</i> Paragraph 3: <i>This section of the LF chapter contains more specific direction on managing fresh water to give effect to Te Mana o te Wai and contributes to achieving the long-term freshwater visions for each FMU and rohe. It also reflects key direction in the NPSFM for managing the health and well-being of fresh water ...</i>
FPI016	Meridian Energy Ltd	FPI016.020	LF-FW - Freshwater	LF-FW-PR3	Amend	Amend the second paragraph as follows: <i>... It also reflects key direction in the NPSFM for managing the health and well-being of fresh water, including wetlands and rivers in particular. At the same time, this section of the LF chapter recognises and provides for the national significance of renewable electricity generation activities, and matters of national importance under section 6 of the RMA 1991 ...</i>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.034	LF-FW - Freshwater	LF-FW-PR3	Amend	Amend as necessary to reflect any amendments made to address 2021 Submission Point 24, in summary, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission: <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation.

						<ul style="list-style-type: none"> • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>
FPI009	Central Otago Winegrowers Association	FPI009.010	LF-FW - Freshwater	LF-FW-PR3	Amend	<p>Amend LF–FW–PR3 –Principal reasons as follows:</p> <p><u>Otago’s water bodies are significant features of the region and play an important role in Kāi Tahu beliefs and traditions and enable people and communities to provide for their social, economic, and cultural wellbeing.</u></p>
FPI009	Central Otago Winegrowers Association	FPI009.011	LF-FW - Freshwater	LF-FW-AER	Amend	Consequential amendments to LF-FW-AER to give effect to the relief sought.
FPI046	QLDC	FPI046.016	LF-FW - Freshwater	LF-FW-AER4	Support	Retain as notified
FPI030	Kāi Tahu ki Otago	FPI030.039	LF-FW - Freshwater	LF-FW-AER4	Support	Retain as notified
FPI035	Wise Response Society	FPI035.020	LF-FW - Freshwater	LF-FW-AER4	Amend	Fresh water is allocated within limits that contribute to achieving specified environmental outcomes for water bodies within timeframes set out in regional plans that are no less stringent than the timeframes in the LF–VM section of this chapter <u>and meet all RPS and National policies and standards.</u>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.035	LF-FW - Freshwater	LF-FW-AER4	Amend	<p>Amend as necessary to reflect any amendments made to address 2021 Submission Point 24, in summary, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>
FPI046	QLDC	FPI046.017	LF-FW - Freshwater	LF-FW-AER5	Support	Retain as notified

FPI030	Kāi Tahu ki Otago	FPI030.039	LF-FW - Freshwater	LF-FW-AER5	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.036	LF-FW - Freshwater	LF-FW-AER5	Amend	<p>Amend as necessary to reflect any amendments made to address 2021 Submission Point 24, in summary, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>
FPI046	QLDC	FPI046.018	LF-FW - Freshwater	LF-FW-AER6	Support	Retain as notified
FPI030	Kāi Tahu ki Otago	FPI030.039	LF-FW - Freshwater	LF-FW-AER6	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.037	LF-FW - Freshwater	LF-FW-AER6	Amend	<p>Amend as necessary to reflect any amendments made to address 2021 Submission Point 24, in summary, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>
FPI046	QLDC	FPI046.019	LF-FW - Freshwater	LF-FW-AER7	Support	Retain as notified
FPI030	Kāi Tahu ki Otago	FPI030.039	LF-FW - Freshwater	LF-FW-AER7	Support	Retain as notified

FPI026	Federated Farmers of New Zealand	FPI026.035	LF-FW - Freshwater	LF-FW-AER7	Oppose	Delete LF-FW-AER7
FPI020	Silver Fern Farms Ltd	FPI020.023	LF-FW - Freshwater	LF-FW-AER7	Oppose	Delete AER7.
FPI047	Horticulture New Zealand	FPI047.027	LF-FW - Freshwater	LF-FW-AER7	Oppose	Delete LF-FW-AER7
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.038	LF-FW - Freshwater	LF-FW-AER7	Amend	<p>Amend as necessary to reflect any amendments made to address 2021 Submission Point 24, in summary, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. <p>Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).</p>
FPI046	QLDC	FPI046.020	LF-FW - Freshwater	LF-FW-AER8	Support	Retain as notified
FPI030	Kāi Tahu ki Otago	FPI030.039	LF-FW - Freshwater	LF-FW-AER8	Support	Retain as notified
FPI020	Silver Fern Farms Ltd	FPI020.024	LF-FW - Freshwater	LF-FW-AER8	Amend	<p>Amend as follows:</p> <p>LF-FW-AER8 Where water is not degraded, there is no reduction (<u>as a result of consented activities</u>) in water quality <u>below any specified environmental outcomes or limits relevant to the waterbody.</u></p>
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.039	LF-FW - Freshwater	LF-FW-AER8	Amend	<p>Amend as necessary to reflect any amendments made to address 2021 Submission Point 24, in summary, overhaul the pORPS as per paragraphs 13-30 of the 2021 Submission:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management.

						<ul style="list-style-type: none"> Undertake the necessary research, analysis, and evaluation to understand Otago's soil and water resources before redrafting the LF chapter. Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL).
FPI046	QLDC	FPI046.021	LF-FW - Freshwater	LF-FW-AER9	Support	Retain as notified
FPI020	Silver Fern Farms Ltd	FPI020.025	LF-FW - Freshwater	LF-FW-AER9	Support	Retain as notified.
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.026	LF-FW - Freshwater	LF-FW-AER9	Amend	Amend as follows: The <u>Direct discharges of wastewater to water are phased out and</u> frequency of wastewater overflows is reduced.
FPI030	Kāi Tahu ki Otago	FPI030.040	LF-FW - Freshwater	LF-FW-AER9	Amend	Amend as follows: The <u>Direct discharges of wastewater to water are phased out and</u> frequency of wastewater overflows is reduced.
FPI042	Ngāi Tahu ki Murihiku	FPI042.012	LF-FW - Freshwater	LF-FW-AER9	Amend	Amend LF-FW-AER9, as follows: The frequency of <u>Direct discharges of wastewater to water bodies is</u> are reduced across the region and no longer occurring in some places to support visions for water bodies.”
FPI046	QLDC	FPI046.022	LF-FW - Freshwater	LF-FW-AER10	Support	Retain as notified
FPI020	Silver Fern Farms Ltd	FPI020.026	LF-FW - Freshwater	LF-FW-AER10	Support	Retain as notified
FPI030	Kāi Tahu ki Otago	FPI030.039	LF-FW - Freshwater	LF-FW-AER10	Support	Retain as notified
FPI042	Ngāi Tahu ki Murihiku	FPI042.013	LF-FW - Freshwater	LF-FW-AER10	Amend	Amend LF-FW-AER10, as follows: <u>Direct Discharges of stormwater to water bodies are reduced across the region and</u> The the quality of stormwater discharges from existing urban areas is improved.”
FPI033	Fulton Hogan Ltd	FPI033.005	LF-FW - Freshwater	LF-FW-AER11	Support	Retain as notified.
FPI030	Kāi Tahu ki Otago	FPI030.039	LF-FW - Freshwater	LF-FW-AER11	Support	Retain as notified
FPI020	Silver Fern Farms Ltd	FPI020.027	LF-FW - Freshwater	LF-FW-AER11	Oppose	Delete this AER.
FPI035	Wise Response Society	FPI035.021	LF-FW - Freshwater	LF-FW-AER11	Amend	There is <u>a steady gain</u> no reduction in the extent or quality of Otago's natural wetlands.
FPI046	QLDC	FPI046.023	LF-FW - Freshwater	LF-FW-AER11	Amend	There is no reduction in the extent or <u>quality condition</u> of Otago's natural wetlands.

FPI026	Federated Farmers of New Zealand	FPI026.034	LF-FW - Freshwater	LF-FW-AER11	Amend	Amend LF-FW-AER11 as follows <i>There is no reduction in the extent or quality of Otago's natural wetlands <u>from an activity</u></i>
FPI024	DairyNZ Limited	FPI024.034	LF-FW - Freshwater	LF-FW-AER11	Amend	Amend as follows: There is no reduction in the extent or quality <u>quality values</u> of Otago's natural wetlands.

LF-LS – Land and soil

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.044	LF-LS - Land and soil	General submission	Oppose	Delete the subchapter. Redraft the subchapter in line with the operative NPS-HPL and reorient the subchapter's perspective to focus on soil as a valuable resource in its own right. Now that the NPS-HPL has come into effect, B+LNZ and DINZ anticipates that ORC will want to revisit the wording of Chapter LF-LS and refine the wording of some provisions in light of the requirements of the NPS-HPL. B+LNZ and DINZ wishes to record that that, if ORC intends to make substantive changes to the LF-LS Chapter to accommodate the new requirements of the NPS-HPL, it would welcome an opportunity to contribute to refinement of the wording prior to finalisation of any recommended wording changes through a s 42A report.
FPI037	Fish & Game	FPI037.064	LF-LS - Land and soil	General submission	Amend	Retain, subject to relief sought
FPI042	Ngāi Tahu ki Murihiku	FPI042.014	LF-LS - Land and soil	General submission	Amend	Amend the provisions to better recognise the relationship of forestry with land and water management, including water quantity, erosion and competition with other land uses, References to primary production need to separately differentiate forestry activities, particularly in relation to highly productive land.
FPI043	OWRUG	FPI043.075	LF-LS - Land and soil	LF-LS-P18	Support	Retain as notified
FPI001	Dunedin City Council	FPI001.038	LF-LS - Land and soil	LF-LS-P18	Support	Retain Policy LF-LS-P18 as notified.
FPI030	Kāi Tahu ki Otago	FPI030.041	LF-LS - Land and soil	LF-LS-P18	Support	Retain as notified
FPI047	Horticulture New Zealand	FPI047.028	LF-LS - Land and soil	LF-LS-P18	Support	Retain as notified.
FPI035	Wise Response Society	FPI035.022	LF-LS - Land and soil	LF-LS-P18	Amend	(3) promoting activities that enhance soil retention <u>and soil structure</u>
FPI046	QLDC	FPI046.024	LF-LS - Land and soil	LF-LS-P18	Amend	(2) maintaining, <u>or enhancing</u> , vegetative cover on erosion-prone land, and...
FPI026	Federated Farmers of New Zealand	FPI026.036	LF-LS - Land and soil	LF-LS-P18	Amend	Amend LF-LS-P18: Soil erosion to consider phrasing in use of "scale"
FPI020	Silver Fern Farms Ltd	FPI020.028	LF-LS - Land and soil	LF-LS-P18	Amend	Amend as follows: LF-LS-P18 – Soil erosion Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by: [...] (2) maintaining, <u>or re-establishing</u> , vegetative cover on erosion-prone land, and

						<i>[Remainder of provision not shown here].</i>
FPI027	Contact Energy Limited	FPI027.036	LF-LS - Land and soil	LF-LS-P18	Amend	Contact seeks amendments to the policy to reflect that there may sometimes be practical limitations in respect of clauses (1) and (2).
FPI024	DairyNZ Limited	FPI024.035	LF-LS - Land and soil	LF-LS-P18	Amend	Amend the policy as follows: Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by: (1) implementing <u>effective</u> management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to water bodies, including by controlling the timing, duration, scale and location of soil exposure, (2) maintaining vegetative cover on erosion prone land, and promoting activities that enhance soil retention.
FPI031	Oceana Gold Ltd	FPI031.013	LF-LS - Land and soil	LF-LS-P18	Amend	Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by, <u>to the extent practicable</u> : (1) implementing effective management practices to retain topsoil in-situ and minimise ...
FPI017	Ravensdown Ltd	FPI017.013	LF-LS - Land and soil	LF-LS-P18	Amend	Amend Policy LF-LS-P18 as follows: Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by: (1) implementing <u>appropriate and</u> effective management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to waterbodies, including by controlling the timing, duration, scale and location of soil exposure, (2) maintaining vegetative cover on erosion-prone land, <u>to the extent practicable</u> , and promoting activities that enhance soil retention
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.040	LF-LS - Land and soil	LF-LS-P18	Amend	Delete the subchapter. Redraft the subchapter in line with the operative NPS-HPL and reorient the subchapter's perspective to focus on soil as a valuable resource in its own right.
FPI045	Forest & Bird	FPI045.020	LF-LS - Land and soil	LF-LS-P21	Support	Retain as notified
FPI006	Wendy Gunn	FPI006.003	LF-LS - Land and soil	LF-LS-P21	Support	Retain as notified.
FPI034	The Fuel Companies	FPI034.006	LF-LS - Land and soil	LF-LS-P21	Support	Retain as notified
FPI041	McArthur Ridge Vineyard Ltd	FPI041.012	LF-LS - Land and soil	LF-LS-P21	Support	Retain as notified
FPI025	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.041	LF-LS - Land and soil	LF-LS-P21	Oppose	Delete this provision or move it to LF-FW.

FPI019	Fonterra Co-operative Group Ltd	FPI019.010	LF-LS - Land and soil	LF-LS-P21	Amend	Amend the policy as follows: <i>Achieve the improvement or maintenance of freshwater quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by:</i> <i>(1) reducing managing the adverse effects of direct and indirect discharges of contaminants to water from the use and development of land, and</i> ...
FPI035	Wise Response Society	FPI035.023	LF-LS - Land and soil	LF-LS-P21	Amend	Achieve the improvement or maintenance of fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe <u>and consistent with other regional and national policy</u> by: <i>(1) reducing enforcing</i> direct and indirect discharge <u>standards</u> of contaminants to water from the use and development of land, and <i>(2) actively promoting managing</i> land uses <u>and land use management</u> that may have <u>beneficial</u> adverse effects on the flow of water in surface water bodies or the recharge of groundwater.
FPI043	OWRUG	FPI043.076	LF-LS - Land and soil	LF-LS-P21	Amend	<i>(1) <u>where improvement is required</u>,</i> reducing direct and indirect discharges of contaminants to water from the use and development of land, and ... Consideration should also be given to including a provision encouraging the adoption of good practice measures.
FPI046	QLDC	FPI046.025	LF-LS - Land and soil	LF-LS-P21	Amend	Achieve the improvement or maintenance of freshwater quantity or <u>and</u> quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by:...
FPI026	Federated Farmers of New Zealand	FPI026.037	LF-LS - Land and soil	LF-LS-P21	Amend	Amend to consider variable or intermittent water flow that is not based on activity or use
FPI020	Silver Fern Farms Ltd	FPI020.019	LF-LS - Land and soil	LF-LS-P21	Amend	Amend as follows. LF-LS-P21 – Land use and fresh water Achieve the improvement or maintenance of <u>Improve or maintain</u> fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by: <i>(1) <u>managing the adverse effects of</u> reducing</i> direct and indirect discharges of contaminants to water from the use and development of land, and ...
FPI020	Silver Fern Farms Ltd	FPI020.029	LF-LS - Land and soil	LF-LS-P21	Amend	Amend as follows: LF-LS-P21 – Land use and fresh water Achieve the improvement or maintenance of <u>Improve or maintain</u> fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by: <i>(1) reducing <u>managing</u></i> direct and indirect discharges of contaminants to water from the use and development of land, and
FPI001	Dunedin City Council	FPI001.039	LF-LS - Land and soil	LF-LS-P21	Amend	Amend to restrict the application of this policy to a more specific and narrower set of land use activities with a more realistic policy outcome threshold. For example:

						<u>When considering appropriate areas to enable new urban growth or setting rules to manage land uses, consider how land uses may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater, and ensure that management approaches will achieve the <i>environmental outcomes</i> set for <i>Freshwater Management Units</i> and/or rohe.</u>
FPI027	Contact Energy Limited	FPI027.037	LF-LS - Land and soil	LF-LS-P21	Amend	Contact seeks amendments to LF-LS-P21(3) to recognise that there are practical limitations to the extent to which the margins of the waterbodies associated with the Clutha Hydro Scheme can be maintained or enhanced.
FPI024	DairyNZ Limited	FPI024.036	LF-LS - Land and soil	LF-LS-P21	Amend	Amend the policy as follows: <u>Maintain, or if degraded, improve</u> Achieve the improvement or maintenance of fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) reducing direct and indirect discharges of contaminants to <u>fresh</u> water from the use and development of land, and managing land uses that may have adverse effects on the flow <u>quantity</u> of water in surface water bodies or the recharge of groundwater.
FPI030	Kāi Tahu ki Otago	FPI030.042	LF-LS - Land and soil	LF-LS-P21	Amend	Amend as follows: Achieve the improvement or maintenance of <u>freshwater quantity, or quality, and ecosystem values</u> to meet environmental outcomes set for Freshwater Management Units and/or rohe by:
FPI031	Oceana Gold Ltd	FPI031.014	LF-LS - Land and soil	LF-LS-P21	Amend	Achieve the improvement or maintenance of fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) <u>where practicable</u> reducing direct and indirect discharges of contaminants to water from the use and ...
FPI007	John Highton	FPI007.018	LF-LS - Land and soil	LF-LS-P21	Amend	Ensure that the RPS places particular emphasis on protection of water yielding capabilities in the upper reaches of river catchments.
FPI017	Ravensdown Ltd	FPI017.014	LF-LS - Land and soil	LF-LS-P21	Amend	Amend Policy LF-LS-P21 as follows: Achieve the improvement or maintenance of fresh water quantity, or quality <u>The health and well-being of water bodies is maintained or, if degraded, improved to meet</u> environmental outcomes set for Freshwater Management Units and/or rohe by: (1) <u>reducing or otherwise managing the adverse effects of</u> direct and indirect discharges of contaminants to water from the use and development of land <u>to meet environmental outcomes, and</u> (2) managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater, <u>and</u> <u>maintaining or, where degraded, enhancing the habitat and biodiversity values of riparian margins in order to reduce sedimentation of water bodies and support improved functioning of catchment processes.</u>

FPI044	Director General of Conservation	FPI044.022	LF-LS - Land and soil	LF-LS-P21	Amend	Amend as follows or words to like effect: “Achieve the improvement or maintenance of freshwater quantity, or <u>quality, and ecosystem values</u> to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) ... (2) <u>..., and</u> (3) <u>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> ”
FPI047	Horticulture New Zealand	FPI047.029	LF-LS - Land and soil	LF-LS-P21	Amend	Amend policy LF-LS-P21 as follows: ... (1) <u>Where improvement is required, reduce</u> reducing direct and indirect discharges of contaminants to water from the
FPI021	Ballance Agri-Nutrients Ltd	FPI021.006	LF-LS - Land and soil	LF-LS-P21	Amend	Amend LF-LS-P21 – Land use and fresh water, as follows: LF-LS-P21 – Land use and fresh water Achieve the improvement or maintenance of freshwater quantity or quality <u>The health and well-being of water bodies is maintained or, if degrade, improved</u> Achieve the improvement or maintenance of freshwater quantity or quality <u>The health and well-being of water bodies is maintained or, if degrade, improved</u> to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) <u>reducing or otherwise managing the adverse effects of</u> direct and indirect discharges of contaminants to water from the use and development of land <u>to meet environmental outcomes</u> , and (2) managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater.
FPI046	QLDC	FPI046.026	LF-LS - Land and soil	LF-LS-M11	Support	Retain as notified
FPI017	Ravensdown Ltd	FPI017.015	LF-LS - Land and soil	LF-LS-M11	Support	Retain as notified
FPI047	Horticulture New Zealand	FPI047.030	LF-LS - Land and soil	LF-LS-M11	Support	Retain as notified.
FPI041	McArthur Ridge Vineyard Ltd	FPI041.013	LF-LS - Land and soil	LF-LS-M11	Support	Retain as notified
FPI025	Beef+ Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.042	LF-LS - Land and soil	LF-LS-M11	Oppose	Delete this provision or move it to LF-FW.

FPI001	Dunedin City Council	FPI001.040	LF-LS - Land and soil	LF-LS-M11	Not stated	Note comments about consultation on the yet to be developed Regional Plan: Land and Water.
FPI035	Wise Response Society	FPI035.024	LF-LS - Land and soil	LF-LS-M11	Amend	(b) the adoption of practices that reduce the risk of sediment and nutrient loss to water, including by minimising the <u>use of synthetic fertilizer</u> and area and duration of exposed soil, using buffers, and actively managing critical source areas, ... (2) Actively promote <u>provide for</u> changes in land use and land use management that improve the sustainable and efficient allocation and use of fresh water, <u>for systems compatible with national emissions reduction policy</u> and (3) <u>implementation of</u> policies LF-LS-P16 to LF-LF-P22.
FPI036	Otago forestry companies	FPI036.004	LF-LS - Land and soil	LF-LS-M11	Amend	Insert a new (b) and renumber, as follows: <u>(b) the development and implementation of harvest and forest earthwork management plans as set out in the NES-PF.</u>
FPI037	Fish & Game	FPI037.022	LF-LS - Land and soil	LF-LS-M11	Amend	... (a) the development and implementation of certified freshwater farm plans as required by the RMA and any regulations, (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,...
FPI043	OWRUG	FPI043.077	LF-LS - Land and soil	LF-LS-M11	Amend	<u>4) identify and map highly productive land.</u>
FPI006	Wendy Gunn	FPI006.002	LF-LS - Land and soil	LF-LS-M11	Amend	Reads " Provide for changes in land use that improve the sustainable and efficient allocation and use of freshwater. Amend to bold the word improve.
FPI024	DairyNZ Limited	FPI024.037	LF-LS - Land and soil	LF-LS-M11	Amend	Amend the method as follows: 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: (1) manage land uses that may affect the ability of environmental outcomes for water quality to be achieved by requiring: (a) <u>supporting</u> the development and implementation of certified freshwater farm plans as required by the RMA and any regulations, (b) <u>supporting</u> 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, and actively managing critical source areas, (c) <u>requiring effective</u> management of effluent storage and applications systems, and (d) <u>requiring</u> earthworks activities to implement effective sediment and erosion control practices and setbacks from water bodies to reduce the risk of sediment loss to water, and

						(2) provide for changes in land use that improve the sustainable and efficient allocation and use of fresh water, and implement policies LF-LS-P16 to LF-LF-P22.
FPI030	Kāi Tahu ki Otago	FPI030.043	LF-LS - Land and soil	LF-LS-M11	Amend	Amend as follows: <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> (1) ... (a) <i>the development and implementation of certified freshwater farm plans as required by the RMA and any regulations,</i> (b) ... (c) <i>effective management of effluent storage and applications systems, and</i> (d) ... (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>
FPI007	John Highton	FPI007.019	LF-LS - Land and soil	LF-LS-M11	Amend	I suggest adding a section suggesting that individual farm plans should be informed by a related catchment plan
FPI014	Rayonier Matariki Forests	FPI014.004	LF-LS - Land and soil	LF-LS-M11	Amend	In LF-LS-M11(1), insert a new (b) and renumber as follows: <u>(b) the development and implementation of harvest and forest earthwork management plans as set out in the NES-PF</u>
FPI044	Director General of Conservation	FPI044.023	LF-LS - Land and soil	LF-LS-M11	Amend	Revise to ensure that regional plans give effect to all relevant matters relating to land.
FPI046	QLDC	FPI046.027	LF-LS - Land and soil	LF-LS-AER14	Support	Retain as notified
FPI043	OWRUG	FPI043.082	LF-LS - Land and soil	LF-LS-AER14	Amend	Consequential amendments to give effect to relief sought
FPI030	Kāi Tahu ki Otago	FPI030.044	LF-LS - Land and soil	LF-LS-AER14	Amend	Amend as follows: <i>The use of land supports the achievement of environmental outcomes and objectives in set for Otago's FMUs and rohe.</i>

MAP1

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI027	Contact Energy Limited	FPI027.021	MAP1	MAP1	Support	Contact supports the maps and the proposed FMUs and rohe as shown within it.
FPI037	Fish & Game	FPI037.023	MAP1	MAP1	Amend	Provide an accompanying descriptive text defining the spatial extent of the FMUs and Rohe.
FPI026	Federated Farmers of New Zealand	FPI026.038	MAP1	MAP1	Amend	Consider splitting the Taieri FMU into separate rohe
FPI032	Te Rūnanga o Ngāi Tahu	FPI032.027	MAP1	MAP1	Amend	Amend the coastal boundaries to include all estuarine areas and enclosed shallow inlets.
FPI030	Kāi Tahu ki Otago	FPI030.045	MAP1	MAP1	Amend	<ol style="list-style-type: none"> 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. Amend boundaries of North Otago and Dunedin & Coast FMUs so that the Waikouaiti catchment and the catchment feeding Mataīnaka (Hawksbury Lagoon) are included in the Dunedin & Coast FMU.
FPI044	Director General of Conservation	FPI044.024	MAP1	MAP1	Amend	Amend the coastal boundaries of FMUs to include all estuarine areas and enclosed shallow inlets – including for example the Tautuku and Kaikorai estuaries, Hoopers Inlet, Papanui Inlet, Purakaunui Inlet and Blueskin Bay.

Part B – Submissions on Other Provisions

Submitter Number	Submitter Name	Submission point number	Chapter	Specific Provision	Position	Summary of Decision Requested
FPI035	Wise Response Society	FPI035.027	LF-LS - Land and soil	LF-LS-AER12	Amend	The life-supporting capacity of <u>all</u> soil is <u>being managed for maintained or improved</u> throughout Otago.
FPI035	Wise Response Society	FPI035.028	LF-LS - Land and soil	LF-LS-AER13	Support	The availability and capability of Otago's highly productive land is maintained or improved.
FPI035	Wise Response Society	FPI035.025	LF-LS - Land and soil	LF-LS-M12	Amend	(b) prohibiting minimising the removal of tall tussock grasslands, and (2) provide for and promote encourage the creation and enhancement of vegetated riparian margins and constructed wetlands, and maintain these where they already exist, and ... (4) <u>Actively promote changes in land use that improve the sustainable and effective use of fresh water, reduce the need for chemical inputs and that are consistent with national net zero carbon goals and</u> (5) <u>implementation of policies LF-LS-P16 to LF-LF-P22.</u>
FPI036	Otago forestry companies	FPI036.002	SRMR - Significant resource management issues for the region	SRMR-16	Amend	Amend p 78 (paragraph 4): Activities such as <u>arable, horticultural and pastoral farming, farm systems subject to agricultural intensification, mining, and forestry also contribute.</u>
FPI037	Fish & Game	FPI037.001	Foreword and mihi	General	Amend	Reword and correct the focus of the Foreword
FPI037	Fish & Game	FPI037.028	DEF - Definitions	Degraded	Amend	Should be included in the Freshwater Planning Instrument in relation to freshwater
FPI037	Fish & Game	FPI037.029	DEF - Definitions	Effects management hierarchy	Amend	Should be included in the Freshwater Planning Instrument in relation to natural wetlands and rivers
FPI037	Fish & Game	FPI037.030	DEF - Definitions	Freshwater	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.031	DEF - Definitions	Freshwater management unit/FMU	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.032	DEF - Definitions	Lake	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.033	DEF - Definitions	Natural wetland	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.034	DEF - Definitions	Outstanding water body	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.035	DEF - Definitions	River	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.036	DEF - Definitions	Te Mana o te Wai	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.037	DEF - Definitions	Water body	Amend	Should be included in the Freshwater Planning Instrument

FPI037	Fish & Game	FPI037.038	DEF - Definitions	Wetland	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.039	LF-FW - Freshwater	LF-WAI-P4	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.040	LF-FW - Freshwater	LF-FW-O8	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.041	LF-FW - Freshwater	LF-FW-P8	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.042	LF-FW - Freshwater	LF-FW-P11	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.043	LF-FW - Freshwater	LF-FW-P12	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.044	LF-FW - Freshwater	LF-FW-M5	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.045	LF-FW - Freshwater	LF-FW-P13	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.046	LF-FW - Freshwater	LF-FW-P14	Amend	Should be included in the Freshwater Planning Instrument
FPI037	Fish & Game	FPI037.047	LF-FW - Freshwater	LF-FW-P13A	Amend	Should be included in the Freshwater Planning Instrument in relation to natural wetlands and rivers
FPI038	NZSki Ltd	FPI038.006	DEF - Definitions	Resilient or resilience	Amend	Means the capacity and ability to withstand or recover quickly from adverse conditions
FPI037	Fish & Game	FPI037.002	DEF - Definitions	Natural environment	Amend	Natural environment means: <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> <u>(b) ecosystems, their constituent parts and the natural processes that sustain these,</u> <u>(c) the natural landscape and landforms that are formed by the interactions between (a) and (b), and</u> <u>(d) excludes pests and domestic and farmed animals.</u>
FPI037	Fish & Game	FPI037.003	DEF - Definitions	Minimise	Amend	Minimise means to reduce to the smallest amount reasonably practicable. <u>Minimised, minimising and minimisation have the corresponding meaning.</u>
FPI037	Fish & Game	FPI037.004	DEF - Definitions	Precautionary approach	Amend	Precautionary approach means an approach that: <u>(a) avoids not acting due to uncertainty about the quality of quantity of the information available, and</u>

						<u>(b) interprets uncertain information in a way that best supports the health, well-being and resilience of the natural environment</u>
FPI037	Fish & Game	FPI037.005	DEF - Definitions	Restore	Amend	<u>Restore</u> means to return to a state of good health, well-being and resilience.
FPI038	NZSki Ltd	FPI038.004	DEF - Definitions	Minimise	Amend	Insert definition for "minimise", as below: <u>Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</u>
FPI038	NZSki Ltd	FPI038.005	DEF - Definitions	Natural environment	Amend	Insert definition of "Natural Environment", as follows: <u>Means (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; and (b) ecosystems and their constituent parts.</u>
FPI038	NZSki Ltd	FPI038.016	GEN - General submission	ECO-P3	Amend	(a) any <u>discernible</u> reduction of the area or values (even if those values are not themselves significant) identified under ECO-P2(1), or
FPI038	NZSki Ltd	FPI038.019	SRMR - Significant resource management issues for the region	SRMR-I1	Amend	The Otago region is exposed to a wide variety of natural hazards that impact on people, property, infrastructure, historic heritage and the wider environment. When a <u>major</u> natural hazard event occurs, it is usually difficult and costly for a community to recover...
FPI038	NZSki Ltd	FPI038.022	SRMR - Significant resource management issues for the region	SRMR-I7	Amend	Insert statement/discussion in this section about the need to restore biodiversity, not just maintain or protect what's left.
FPI039	Realnz	FPI039.001	GEN - General submission	New provision	Amend	Insert new provisions which explicitly promote the benefits of and provide for people's well-being, including the use of and access to the natural environment for transport, the visitor industry inclusive of commercial recreation, and ancillary commercial and industry services
FPI039	Realnz	FPI039.006	DEF - Definitions	Minimise	Amend	Insert definition for "minimise", as below: <u>Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</u>
FPI039	Realnz	FPI039.007	DEF - Definitions	Natural environment	Amend	Insert definition of "Natural Environment", as follows: <u>Means (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; and (b) ecosystems and their constituent parts.</u>
FPI039	Realnz	FPI039.008	DEF - Definitions	Resilient or resilience	Amend	Means the capacity and ability to withstand or recover quickly from adverse conditions.
FPI039	Realnz	FPI039.018	GEN - General submission	ECO-P3	Amend	(a) any <u>discernible</u> reduction of the area or values (even if those values are not themselves significant) identified under ECO-P2(1), or

FPI039	Realnz	FPI039.021	SRMR - Significant resource management issues for the region	SRMR-I1	Amend	The Otago region is exposed to a wide variety of natural hazards that impact on people, property, infrastructure, historic heritage and the wider environment. When a <u>major</u> natural hazard event occurs, it is usually difficult and costly for a community to recover...
FPI039	Realnz	FPI039.024	SRMR - Significant resource management issues for the region	SRMR-I7	Amend	Insert statement/discussion in this section about the need to restore biodiversity, not just maintain or protect what's left.
FPI043	OWRUG	FPI043.004	GEN - General submission	Description of the Region	Amend	Amend Description of the Region to: <ul style="list-style-type: none"> • Appropriately record the significant role of the Food and Fibre Sector • Identify that the region is nationally recognised for its unique productive capacity and place in the national food and fibre supply network. • Identify that the unique climatic conditions create unique opportunities for the food and fibre sector, particularly horticulture and fine wool production. • Recognise the importance of efficient irrigation and water storage to the production of food and fibre
FPI043	OWRUG	FPI043.005	GEN - General submission	Cooperation and partnerships with stakeholders	Amend	Translate statement into a method that commits to the formation of a rural advisory panel.
FPI043	OWRUG	FPI043.006	GEN - General submission	New provision	Amend	Insert a new provision for the Food and Fibre Sector: <u>includes the primary sector production industries (excluding mining), the related processing industries and services industries along the value chain from producer to final consumer including transporters, storage, distribution marketing and sales.</u>
FPI043	OWRUG	FPI043.007	GEN - General submission	New provision	Amend	Include a definition for highly productive land as follows: <u>a) Land that has been identified as highly productive land using LF-LS-P19; OR</u> <u>b) where identification has not occurred as in a), land in the rural area that is classified as LUC 1,2 3 or 4 as mapped by the NZ Land Resource Inventory or by more detailed site mapping.</u>
FPI043	OWRUG	FPI043.008	GEN - General submission	Abbreviations table	Support	Retain as notified
FPI043	OWRUG	FPI043.009	GEN - General submission	National directions instruments	Support	Retain as notified
FPI043	OWRUG	FPI043.010	GEN - General submission	MW-01	Amend	Amend MW-01 Principles of Te Tiriti o Waitangi as follows; The principles of Te Tiriti o Waitangi are given effect <u>taken into account by Local Authorities</u> in resource management processes and decisions, utilising a partnership approach between councils and with Papatipu Rūnaka to ensure that what is valued by mana whenua is actively protected in the region <u>support Kai Tahu Values and Resources of significance.</u>
FPI043	OWRUG	FPI043.011	GEN - General submission	MW-P3	Amend	Amend MW-P3 Supporting Kai Tahu Wellbeing as follows; Natural and <u>Physical resources</u> are managed to support Kāi Tahu well-being by:

						<p>1. protecting customary uses, Kāi Tahu values and relationships of Kāi Tahu to resources and areas of significance, and restoring <u>enhancing</u> these uses and values where they have been degraded by human activities,</p> <p>2. safeguarding the mauri and life-supporting capacity <u>health and well-being</u> of natural resources <u>so as to provide for the mauri of these resources</u>, and;</p> <p>...</p>
FPI043	OWRUG	FPI043.012	GEN - General submission	MW-E1	Amend	<p>Amend MW-E1 Explanation as follows;</p> <p>The policies in this section are designed to achieve MW–O1 by setting out the actions that must be undertaken by local authorities to ensure the principles of Te Tiriti o Waitangi <u>are taken into account</u> in resource management processes and decisions. The policies also require the development and implementation of planning tools which recognise the role of Kāi Tahu in resource management and ensure their engagement with and participation in resource management <u>that arises from a partnership approach with Local authorities</u>.</p>
FPI043	OWRUG	FPI043.013	GEN - General submission	MW-PR1	Amend	<p>Amend MW-PR1 Principal Reasons as follows;</p> <p>...</p> <p>Local authorities need to incorporate Treaty principles into their decision making and ensure they are properly applied, to account for the effects of resource management decisions on Kāi Tahu values, including those described in iwi resource management plans. Deliberate measures need to be taken <u>by Local Authorities</u> to ensure the principles are well understood. The principles are broadly expressed <u>which can make it difficult for people to understand their implications and</u> a measure of flexibility is needed in applying them. <u>Local authorities have an important role in facilitating and providing clarity about the implementation of the principles at a practical level</u>.</p>
FPI043	OWRUG	FPI043.014	GEN - General submission	MW-AER1	Amend	<p>MW–AER1 Resource management processes and decisions <u>take into account</u> the principles of Te Tiriti o Waitangi.</p>
FPI043	OWRUG	FPI043.015	GEN - General submission	Interpretation	Amend	<p>Overall clarity and certainty of the pRPS would be enhanced by including te reo terms in the interpretation section.</p>
FPI043	OWRUG	FPI043.016	GEN - General submission	SRMR introduction	Amend	<p>Amend SRMR Introduction as follows;</p> <p>Otago’s people and communities rely on the natural resources that Otago’s environment provides to enable their social, economic, and cultural well-being. Natural resources include freshwater (i.e. surface and groundwater, wetlands, estuaries), land <u>and soil</u>, terrestrial and freshwater ecosystems, coastal and marine ecosystems, and air, landscapes, vegetation and natural landforms.</p> <p>From an economic perspective natural resources support, and are impacted by, food <u>and fibre production</u>, urban development, industrial development, infrastructure, energy generation, transport, marine industries (fishing and aquaculture), tourism and mineral extraction.</p> <p>From a social and cultural perspective natural resources support and are impacted by <u>food and fibre sector production</u>, recreation, housing, and cultural activities (Refer Figure 2). <u>Food and fibre sector production, in particular secure food supply and security are essential to human health needs which are to be provided for through sustainable resource management</u>.</p> <p>This RPS identifies the eleven most significant issues impacting the Otago region. Issues firstly considered include natural hazards, climate change, <u>food and fibre sector production</u>, pest species, water quantity and quality, and biodiversity loss, collectively the “natural asset based issues”.</p>

						Figure 2 should also be amended to refer to food and fibre production
FPI043	OWRUG	FPI043.017	GEN - General submission	SRMR-I1	Amend	<p>Amend SRMR Statement as follows: An earthquake on the Alpine Fault would cause potentially catastrophic impacts on the entire region. Particular areas in Otago are prone to flooding. A major hazard event could isolate all or parts of Otago for an extended time. <u>Natural hazards pose a risk to the food and fibre sector, both in terms of short term provision of food, but also longer term productivity. The role of local food production will be essential in the event of a significant natural hazard. The resilience of the sector is reliant in part on the infrastructure that serves it, such as transport, electricity and communications networks.</u></p> <p>Amend SRMR Context as follows: The Otago region is exposed to a wide variety of natural hazards that impact on people <u>including housing, food and water</u>, property, infrastructure, historic heritage and the wider environment...</p> <p>Frequent heavy rainstorms, the steep gradients of many river catchments and human occupation of floodplains combine to make flooding the most frequently occurring natural hazard event in the Otago region. For example, flooding can affect Otago's main urban centres causing damage to housing and business disruption. <u>It can disrupt food and fibre production which can compromise food supply chains. It also creates animal welfare issues and damages productive land resulting in the likes of crop and infrastructure damage which takes considerable time and effort to reinstate. Recovering from these events can take a number of years.</u></p> <p>Amend Impact Snapshot as follows: Economic ... For industry, hazards can damage production assets and infrastructure with associated costs, disrupt service delivery and limit availability and access to goods and services, and cause decline in sales and increased costs. Loss or changes in production flows can be either temporary or permanent depending on financial resilience of businesses, which is a function of their existing loan commitments, credit worthiness insurance cover <u>and/or the speed at which normal service can resume (if at all). This will often depend on the ability for lifeline utilities to maintain or re-establish normal levels of service quickly.</u> Food <u>security and fibre sector production systems</u> can also be affected <u>impacting on the regional economy with immediate effect on jobs and longer-term effects on production value and domestic and export returns.</u></p> <p>Social <u>There can be short and long terms impacts on the regional and nationally significant Otago food production system. The food supply chain can be disrupted, the extent of which will be influenced by the nature of the event and the ability of lifeline utilities and essential service providers to maintain or re-establish normal levels of service quickly.</u></p>
FPI043	OWRUG	FPI043.018	GEN - General submission	SRMR-I2	Amend	<p>Amend SRMR-I2 as follows: SRMR-I2 – Climate change is likely to <u>will</u> impact our economy and environment Statement...</p> <p>Otago's climate is changing, and these changes will continue for the foreseeable future. Central Otago is likely to see more varied precipitation, leading to increased flooding and reduced water reliability. This will be compounded by stronger winds, increased temperatures and longer dry periods, which may affect the number and types of crops and animals that the land can sustain. <u>Food and fibre production systems will need to change in response and to maintain food supply and important fibre sources for the community.</u></p>

						<p>The impact of other climate change threats is unpredictable. <u>It is important to not create barriers to climate change adaptation and/or mitigation and for long-term climate change adaptation and/or mitigation to be actively facilitated to speed up the transition to a lower emissions economy.</u></p> <p>Context...</p> <p>The rate of future climate change depends on how fast greenhouse gas concentrations increase. <u>The region has an important role to play to reduce emissions including through land use production system adaptation and change.</u></p> <p>Impact Statement...</p> <p>... <u>Diversification to different farm systems and transition to lower emission production systems presents an opportunity to reduce emissions and support the transition to a low emissions economy. It is important that decision makers can assess the benefits of land use change and that the resource management framework facilitates these transitions by providing certainty to enable investment. This includes the utilisation of water to support low emission production systems.</u></p> <p>However, these benefits may be limited by negative effects of climate change such as prolonged drought and increased flood risk. Some of these impacts can be mitigated by adaptation, for example, planting new crops that are better suited to new climatic conditions or through changes in crop intensification, or water harvesting <u>and storage practices.</u></p> <p>Recognise the risk on water resources due to afforestation of plantation forests for carbon sequestration</p>
FPI043	OWRUG	FPI043.019	GEN - General submission	SRMR-13	Amend	<p>Amend SRMR- 13 as follows: Include reference to Wallabies throughout SRMR-13 SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, <u>food and fibre production and food security</u>, economic activities and landscapes.</p> <p>Statement...</p> <p>Pest species can be found throughout Otago, from alpine to marine environments. Rabbits are changing Central Otago’s landscape, eroding soils and affecting agriculture. <u>Wallabies are an increasing risk with incursion beyond their containment zone and illegal liberations resulting in an expanding range within Otago, particularly Waitaki, Central Otago and Queenstown Lakes.</u> Wilding conifers threaten high country and tussock grassland, changing the landscape and impacting on recreational, hydrological and conservation values. Aquatic pests and weeds such as didymo, lake snow and lagarosiphon affect our lakes and rivers. Invasive marine species affect our marine waters. Native aquatic plants are displaced, impacting ecosystem and indigenous biodiversity health and recreation activities.</p> <p><u>Climate change will compound the impacts of existing pests and provide opportunities for new pests to establish themselves. This will potentially threaten food and fibre production systems and food supply and undermine community wellbeing.</u></p> <p>Impact snapshot/social...</p> <p>Recreation values can be impacted through loss of amenity, access or landscape values. Pests can also cause human health problems. For example, some weed pollens can induce asthma and cause allergies (e.g. hay fever). Zoonoses (bacterium, viruses, parasites, prions) can result in diseases being transferred from animals to humans and include, for example, leptospirosis and campylobacter. <u>Pests and biosecurity incursions can affect food and fibre production, food supply and food security matters.</u></p>

FPI043	OWRUG	FPI043.020	GEN - General submission	General submission	Amend	Refer to Food and Fibre Sector instead of agriculture. This should be picked up throughout the plan.
FPI043	OWRUG	FPI043.021	GEN - General submission	SRMR-I4	Amend	Include the loss of productive land (either directly though building on it, or indirectly though reverse sensitivity effects) as a social impact on food production and food security. Identify that water is another resource that can be adversely affected by poorly managed urban growth and development.
FPI043	OWRUG	FPI043.024	GEN - General submission	SRMR-I7	Amend	Environmental ... Add the following paragraph <u>Despite the above, in some cases land management or water use practices are enabling indigenous species to persist. It is therefore important to carefully manage significant changes in such practices where they might give rise to unintended consequences.</u> Economic ... Amend 'agriculture' to 'the food and fibre sector'.
FPI043	OWRUG	FPI043.025	GEN - General submission	SRMR-I8	Amend	Otago's coast is a rich natural, cultural and economic resource that is under threat from a range of terrestrial and marine activities, the context identifies that the activities occurring within or affecting the coastal environment include land and marine based (e.g. aquaculture) <u>food and fibre production...</u>
FPI043	OWRUG	FPI043.027	GEN - General submission	SRMR-I10	Amend	Delete the issue statement and replace with the following: <u>SRMR-I10 – The planning framework in Otago has at times and in some locations failed to manage and protect Otago's natural and physical resources, resulting in environmental stresses and unknown future impacts.</u> Change reference to 'economic activities' to refer to 'activities' Amend Context paragraph 2 as follows: Delete first sentence and replace with: <u>Activities that rely on natural and physical resources can adversely impact those resources if not appropriately managed or controlled. If these impacts are not managed or controlled the sustainability of the regions natural resources can be threatened. Equally long-term economic, social and cultural values can be compromised or threatened.</u> Amend 'tipping point' to 'thresholds' Delete 'Business' from Impact Snapshot Social.
FPI043	OWRUG	FPI043.028	GEN - General submission	SRMR-I11	Amend	Amend SRMR- I11 Statement as follows: How and/or where we currently live is likely to change significantly over the long-term (2050). To respond to all the issues identified in this RPS, it is essential to consider changes to how we travel, the industries our economy relies on, the use we currently make of the natural and physical resources of the region, and how we provide for <u>human health needs</u> , personal and community well-being, all while protecting our natural environment. Replace 'tipping point' with 'threshold' throughout the SRMR The Impact Snapshot – Social and Economic be redrafted so that's intent is clear and consistent language is used so as to avoid uncertainty.
FPI043	OWRUG	FPI043.029	GEN - General submission	SRMR-IX - new	Amend	<u>The Food and Fibre Sector is facing a significant period of change due to climate change and the need to improve environmental outcomes.</u> Statement: <u>The Food and Fibre sector is essential to the New Zealand and Otago economy. New Zealand is renowned for producing high quality products capable of achieving a premium price and providing food and materials for domestic consumption.</u>

					<p><u>This generates significant benefits for our economy and communities. However, the sector faces some significant challenges in the short, medium and long-term driven by climate change, requirements to improve environmental outcomes and global consumer trends. Otago is uniquely exposed to these challenges because of the profile of its economy. As such, particular attention needs to be paid to how change is managed.</u></p> <p><u>Context: The food and fibre sector accounts for a significant proportion of the Otago economy. For example, in Central Otago District 14.7% of GDP, compared to the national average of 6.2%5 . In the Clutha District, Agriculture, Forestry and Fishing make up 32.1% of GDP, and in the Waitaki District Agriculture, Forestry and Fishing make up 32.5% of GDP6 . This presents risks and opportunities for the region. It means that if change is managed poorly the region will feel the impacts of this disproportionately, but the reverse is also true. Regardless, careful management of change within the sector is important so that communities are not unnecessarily impacted in a negative way. This includes the potential downstream impacts of a successful transition that have the potential to create other challenges such as pressure for urban growth and associated infrastructure.</u></p> <p><u>Impact snapshot/environmental: The Food and Fibre sector cannot operate on a business as usual basis. Even in locations where water availability and water quality issues are not of concern adaptations will be necessary so that the sector is contributing to New Zealand’s carbon zero 2050 commitments. However, demand for the products produced by the Food and Fibre Sector are likely to continue to increase and the ability of the sector to meet this demand will be critical to the wellbeing of the community, particularly with respect to the provision of nutrient dense food. It will be necessary for the sector to innovate to ensure it can meet the demands of the community while working within environmental limits. There needs to be a considered and integrated approach to land-use change so that it does not give rise to unintended consequences. For example, widespread establishment of carbon forestry may adversely affect water availability, and irreversibly remove land from food production.</u></p> <p><u>Impact snapshot/economic: As highlighted above the Food and Fibre sector has a critical role in the national and regional economy. Ultimately a well-managed transition to more efficient production methods is likely to result in higher wages through demand for more highly skilled staff etc. In the interim though change has the potential to come at significant cost to the sector. Individual producers will have varying capacity to implement changes due to their current capital structure etc. Regulatory changes that significantly compromise productivity are likely to impact on land value which will affect the equity position of some businesses and hamper their ability to implement further changes. These issues reinforce the need for a well-managed transition that allows a degree of flexibility, particularly in the medium term.</u></p> <p><u>Impact snapshot/social: It is not just the economic benefits associated with primary production that are important. A thriving Food and Fibre Sector supports thriving rural communities ensuring these communities continue to have viable populations that support wider community activities including schools, recreational clubs, businesses etc. In recent years the rural community has faced significant pressure due to widespread concern about the effects of rural activities on the natural environment. These issues combined with the significant regulatory uncertainty arising as a result is having an adverse effect on the health and wellbeing of people within the rural sector. At its worst these pressures can result in suicide with suicide rates in rural communities significantly higher than in urban areas. This is another reason for ensuring that the transition required within sector is carefully managed with consideration given to the capacity of the community to sustain change.</u></p>
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FPI043	OWRUG	FPI043.030	GEN - General submission	IM-01	Amend	The management of natural and physical resources in Otago, by and for the people of Otago, including Kāi Tahu, and as expressed in all resource management plans and decision making, achieves healthy, resilient, and safeguarded natural systems, and the ecosystem services they offer and supports the <u>social, cultural and economic well-being</u> of present and future generations, (mō tātou, ā, mō kā uri ā muri ake nei).
FPI043	OWRUG	FPI043.031	GEN - General submission	IM-03	Oppose	Delete IM-03 in its entirety
FPI043	OWRUG	FPI043.032	GEN - General submission	IM-04	Support	Support
FPI043	OWRUG	FPI043.033	GEN - General submission	IM-P1	Amend	(1) all activities are carried out within the environmental constraints limits and framework of this RPS,
FPI043	OWRUG	FPI043.034	GEN - General submission	IM-P2	Oppose	Delete provision
FPI043	OWRUG	FPI043.035	GEN - General submission	IM-P4	Amend	(1) protects <u>has regard to</u> their intrinsic values,
FPI043	OWRUG	FPI043.036	GEN - General submission	IM-P6	Amend	Avoid unreasonable delays in decision-making processes Decision making is informed by complete and scientifically robust data or, where obtaining such data is not practicable, by consideration of best available information including modelling, by using the best information available at the time, including but not limited to mātauraka Māori, local knowledge, and reliable partial data.
FPI043	OWRUG	FPI043.037	GEN - General submission	IM-P9	Amend	By 2030 Otago's communities have <u>shall</u> established responses for adapting to the impacts of climate change, <u>including provision for how they are</u> adjusting their lifestyles to follow them, and are reducing their greenhouse gas emissions to achieve net-zero carbon emissions by 2050.
FPI043	OWRUG	FPI043.038	GEN - General submission	IM-P10	Amend	<u>(4) provide short, medium and long term measures that enable rural communities to adapt and provides certainty to support the investment required to implement change.</u>
FPI043	OWRUG	FPI043.039	GEN - General submission	IM-P11	Amend	Enhance environmental resilience to the adverse effects of climate change by facilitating activities that reduce human impacts on the environment <u>support this.</u>
FPI043	OWRUG	FPI043.040	GEN - General submission	IM-P12	Oppose	Delete or amend to be consistent with the purpose of the Resource Management Act
FPI043	OWRUG	FPI043.041	GEN - General submission	IM-P13	Oppose	Delete
FPI043	OWRUG	FPI043.042	GEN - General submission	IM-P14	Oppose	Delete or amend as follows: Preserve opportunities for future generations by <u>when preparing Regional and District Plans:</u> (1) identifying limits to both growth and adverse effects of human activities beyond which the environment will be degraded, (2) requiring that activities occur within those limits, are established in places, and carried out in ways, that are within those limits and are compatible with the natural capabilities and capacities of the resources they rely on, and ...

FPI043	OWRUG	FPI043.043	GEN - General submission	IM-P15	Oppose	Delete
FPI043	OWRUG	FPI043.044	GEN - General submission	IM-M5	Amend	<u>5) Enable appropriate water storage solutions to mitigate the effects of climate change</u>
FPI043	OWRUG	FPI043.045	GEN - General submission	IM-E1	Amend	Consequential amendments to give effect to relief sought
FPI043	OWRUG	FPI043.046	GEN - General submission	IM-PR1	Amend	The provisions seek to enshrine an explicit recognition and implementation of these facets into plan making and resource consenting processes. They set an expectation of integrated resource management that flows through to all other provisions of the RPS, and informs the limits and thresholds we set on human activities for protecting environmental health...
FPI043	OWRUG	FPI043.047	LF-WAI - Te Mana o te Wai	LF-WAI-P2	Amend	Consequential amendments to give effect to relief sought in LF-WAI-P1
FPI043	OWRUG	FPI043.048	LF-WAI - Te Mana o te Wai	LF-WAI-P3	Amend	Manage the use of fresh water and land in accordance with tikaka and kawa , using an integrated approach that: ... <u>(3A) sustains food and fibre production to provide for the social, cultural, economic and health needs of the community</u> ... <u>(6A) has regard to the need to reduce emissions that contribute to climate change including enabling changes to activities that will contribute to emission reductions.</u>
FPI043	OWRUG	FPI043.049	LF-WAI - Te Mana o te Wai	LF-WAI-P4	Oppose	Delete policy
FPI043	OWRUG	FPI043.053	LF-WAI - Te Mana o te Wai	LF-WAI-E1	Amend	Amend paragraph 3 as follows: The mauri expresses mana and connection for which can only be defined by mana whenua. Amend paragraph 5 as follows: Kawa and tikaka have been developed over the generations, based on customs and values associated with the Māori world view that span the generations. recognising and honouring Implementing Te Mana o te Wai and upholding to protect the health of <u>freshwater upholds</u> the mauri of the wai and is consistent with this value base. Add the following paragraph: <u>Water is valued by the community for a wide variety of reasons. Including productive and recreational values. The ability to utilise water for productive purposes supports a significant proportion of the Otago economy with associated downstream economic and social activity. Water also provides the food and fibre sector with an important resource to build resilience against adverse events including flooding and drought. Access to water, within appropriate environmental limits is an important contributor achieving social, cultural and economic wellbeing within Otago.</u>
FPI043	OWRUG	FPI043.054	LF-WAI - Te Mana o te Wai	New AER	Amend	<u>There is balance achieved between water, the wider environment and the community that allows the community to be healthy and provide for its social economic and cultural wellbeing.</u>

FPI043	OWRUG	FPI043.055	LF-VM - Visions and management	LF-VM-M3	Amend	(1) engaging <u>and partnering</u> with communities to identify environmental outcomes for Otago's FMUs and rohe and the methods to achieve those outcomes, (2) encouraging community stewardship, <u>including through catchment groups</u> of water resources and programmes to address freshwater issues at a local catchment level, (3) supporting community initiatives, <u>including water storage</u> , that contribute to maintaining or improving the health and well-being of water bodies, and ...
FPI043	OWRUG	FPI043.056	LF-FW - Freshwater	LF-FW-P12	Amend	(3) recognising that for infrastructure, EIT-INF- P13 applies instead of LF-FW-P12.
FPI043	OWRUG	FPI043.059	LF-FW - Freshwater	LF-FW-P13	Amend	(3) recognising that for infrastructure, EIT-INF- P13 applies instead of LF-FW-P13. Delete Clause (3) of LF-FW-P13 and add a new flow setting policy as below: NEW: Policy LF-FW-FS1: <u>Set environmental flow regimes within Otago lakes and rivers in accordance with the FMU objectives and the NOF limit setting process in Appendix 1 of the National Policy Statement for Freshwater Management 2020.</u>
FPI043	OWRUG	FPI043.060	LF-FW - Freshwater	LF-FW-P14	Amend	(1) restore a form and function that reflect the natural behaviours of the water body, <u>recognising where applicable the effect that infrastructure may have had on the form and function of the water body.</u> And Delete Clause (5) of LF-FW-P14
FPI043	OWRUG	FPI043.062	LF-LS - Land and soil	LF-LS-O11	Amend	The life-supporting capacity of Otago's soil resources is safeguarded and the availability and productive capacity of <u>highly productive</u> land for <u>primary Food and Fibre Sector</u> production is maintained now and for future generations.
FPI043	OWRUG	FPI043.063	LF-LS - Land and soil	LF-LS-O12	Support	Retain as notified
FPI041	McArthur Ridge Vineyard Ltd	FPI041.011	LF-LS - Land and soil	LF-LS-O12	Support	Retain as notified
FPI043	OWRUG	FPI043.066	LF-LS - Land and soil	LF-LS-P16	Support	Retain as notified
FPI043	OWRUG	FPI043.067	LF-LS - Land and soil	LF-LS-P17	Amend	Maintain the maori health, <u>well-being</u> and productive potential of soils by managing the use and development of land in a way that is suited to the natural soil characteristics and that sustains healthy:
FPI043	OWRUG	FPI043.068	GEN - General submission	EIT-INF-O5	Amend	Amend to refer to infrastructure generally.
FPI043	OWRUG	FPI043.071	GEN - General submission	EIT-INF-O6	Amend	Amend to refer to infrastructure generally.
FPI043	OWRUG	FPI043.072	GEN - General submission	EIT-INF-P10	Amend	Amend to refer to infrastructure generally.
FPI043	OWRUG	FPI043.073	GEN - General submission	EIT-INF-P11	Amend	Amend to refer to infrastructure generally.
FPI043	OWRUG	FPI043.074	GEN - General submission	EIT-INF-P12	Amend	Amend to refer to infrastructure generally.

FPI043	OWRUG	FPI043.078	GEN - General submission	EIT-INF-E2	Amend	Amend to refer to infrastructure generally
FPI043	OWRUG	FPI043.079	GEN - General submission	EIT-INF-13	Amend	(2) If it is not possible to avoid locating in the areas list in (1) above because of the functional or operational needs of the infrastructure manage effects as follows: (a) in significant natural areas in accordance with ECO-P46, ... (c) In other areas listed in EIT-INF-p13(1) above minimise the adverse effects of the infrastructure on the values that contribute to the area's importance in accordance with the effects management hierarchy (other matters)
FPI043	OWRUG	FPI043.080	DEF - Definitions	Effects management hierarchy (other matters)	Amend	Add new definition of "Effects Management Hierarchy (other matters) <u>means an approach to managing the adverse effects (including cumulative effects and loss of potential value) of an activity on the extent or values of a, outstanding natural feature or landscape outstanding water bodies (excluding natural wetlands), area of high or outstanding natural character, area or place of significant or outstanding historic heritage, wahi tapu, wahi taoka, areas with protected customary rights, and areas of high recreational and high amenity value that requires that:</u> <u>(a) Adverse effects are avoided where practicable,</u> <u>(b) Where adverse effects cannot be avoided, they are minimised where practicable,</u> <u>(c) Where adverse effects cannot be minimised, they are remedied where practicable,</u> <u>(d) Where adverse effects cannot be remedied, they are mitigated to the extent practicable,</u> <u>(e) Where more than minor adverse effects cannot be avoided, minimised, remedied or mitigated offsetting and/or environmental compensation must be considered, where appropriate.</u>
FPI043	OWRUG	FPI043.081	GEN - General submission	ECO-P4(1)	Amend	Amend to refer to infrastructure generally.
FPI043	OWRUG	FPI043.083	GEN - General submission	ECO-P6	Amend	Amend to refer to infrastructure generally.
FPI043	OWRUG	FPI043.084	GEN - General submission	EIT-INF-M4	Amend	Amend the provisions to take into account the functional and operational needs of infrastructure.
FPI043	OWRUG	FPI043.085	GEN - General submission	EIT-INF-M5	Amend	Amend the provisions to take into account the functional and operational needs of infrastructure.
FPI043	OWRUG	FPI043.086	GEN - General submission	EIT-INF-AER8	Amend	The adverse effects associated with nationally and regionally significant infrastructure are <u>avoided and minimised to the extent practicable in accordance with the effects management hierarchy.</u>
FPI043	OWRUG	FPI043.087	GEN - General submission	HAZ-NH-P11	Amend	Amend to apply to all owners of freehold land that is susceptible to natural hazards
FPI043	OWRUG	FPI043.088	GEN - General submission	HAZ-NH-M2	Amend	Amend clause (1) to require the development of the Risk Table(s) to be undertaken by December 2023.
FPI043	OWRUG	FPI043.089	GEN - General submission	HAZ-NH-M3	Amend	Amend clause (7)(a) to add <u>commensurate with the level of risk from the proposed activity</u>

FPI043	OWRUG	FPI043.090	GEN - General submission	HAZ-NH-M4	Amend	Amend clause (7)(a) to add <u>commensurate with the level of risk from the proposed activity</u>
FPI043	OWRUG	FPI043.091	GEN - General submission	HCV-HH-P5	Amend	If the amendments sought to EIT-INF-P13 are accepted, then retain clause (6) of HCV-HH-P5. Alternatively, amend clause (6) of Policy HCV-HH-P5 to manage adverse effects on historic heritage for infrastructure that is not nationally or regionally significant in accordance with clauses (3) to (5) of Policy HCV-HH-P5
FPI043	OWRUG	FPI043.092	GEN - General submission	NFL-P1	Amend	In order to manage outstanding and highly valued natural features and landscapes, identify <u>across Otago</u> ...
FPI043	OWRUG	FPI043.093	GEN - General submission	NFL-P2	Amend	(3) recognising that for infrastructure, EIT-INF- P13 applies instead of NFL-P2.
FPI043	OWRUG	FPI043.094	GEN - General submission	NFL-P3	Amend	(2) recognising that for infrastructure, EIT- INF-P13 applies instead of NFL-P3. Alternatively, OWRUG seek that clause (6) of Policy HCV-HH-P5 is amended to manage adverse effects on historic heritage for infrastructure that is not nationally or regionally significant in accordance with clauses (3) to (5).
FPI043	OWRUG	FPI043.095	GEN - General submission	NFL-M1	Amend	Introduce maps of the identified 'outstanding and highly valued natural features and landscapes' into the RPS.
FPI043	OWRUG	FPI043.096	GEN - General submission	UFD-O2	Amend	Minimises conflict between incompatible activities <u>within the urban area and at the urban-rural interface.</u>
FPI043	OWRUG	FPI043.097	GEN - General submission	UFD-O3	Amend	...regionally significant features and values identified by this RPS <u>including highly productive land, and recognises the importance of rural land for productive capacity, rural character, and long-term viability of the food and fibre sector and rural communities</u>
FPI043	OWRUG	FPI043.098	GEN - General submission	UFD-O4	Amend	(3) ... or zoned within district plans as suitable for such development, <u>and recognises the importance of rural land for productive capacity, rural character, and long-term viability of the rural sector and rural communities</u>
FPI043	OWRUG	FPI043.099	GEN - General submission	UFD-P1	Amend	(8) ...important features and values identified by this RPS <u>including highly productive land,</u>
FPI043	OWRUG	FPI043.100	GEN - General submission	UFD-P4	Amend	(7) locates the new urban/rural zone boundary interface by considering : (a) <u>avoiding or minimising</u> adverse effects, particularly reverse sensitivity, on rural areas and existing or potential productive rural activities beyond the new boundary, and ...
FPI043	OWRUG	FPI043.101	GEN - General submission	UFD-P7	Amend	Amend Clause (1) to specify the important features and values that are provided for. Amend Clause (2) to recognise that productive capacity can occur within such areas and should not be precluded.
FPI043	OWRUG	FPI043.102	GEN - General submission	UFD-P8	Amend	<u>Avoids, and where avoidance is not possible, minimises</u> impacts on rural production potential, rural character and potential for reverse sensitivity effects <u>on primary production activities in adjoining rural zones</u>
FPI043	OWRUG	FPI043.103	GEN - General submission	UFD-M2		Minimise the potential for reverse sensitivity effects to arise by managing the location of incompatible activities <u>within the urban area and at the rural-urban interface</u> Amend Clause (4) to refer to UPD-P3: Urban intensification.

						Amend Clause (5) to refer to UPD-P4: Urban expansion.
FPI046	QLDC	FPI046.009	LF-FW - Freshwater	LF-FW-O10	Support	Retain as notified
FPI046	QLDC	FPI046.028	DEF - Definitions	Other	Amend	Add definition of restoration as follows: <u>Restoration means the active intervention and management of modified or degraded habitats, ecosystems, landforms, and landscapes in order to maintain or reinstate indigenous natural character, ecological and physical processes, and cultural and visual qualities, and may include enhancement activities.</u>
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.009	IM – Integrated Management	IM–P2	Support	We support the statement that all decisions shall 1. secure the long term life supporting capacity and mauri of the natural environment, 2. promote the health needs of people and 3. safeguard the ability of people and communities to provide for social, economic and cultural wellbeing now and into the future.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.012	IM – Integrated Management	IM–P4	Support	We support the protection of intrinsic values through a long term strategic approach (which) recognises and provides for ecosystem complexity and connection and anticipates and responds swiftly to changes, pressures and trends.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.013	IM – Integrated Management	IM–P5	Support	IMP5 - We support the objective to achieve ‘Coordinated management and integration of natural and physical resources beyond immediate boundaries, and effects of activities’, beyond the freshwater management subunits, and on other values and environments. Consideration of subunits should sit within catchments and within broader ecosystems, including the impacts on and of freshwater management (or mismanagement) also impacting marine (ref SRMR 16, 17 & 18) and terrestrial ecology and broader systems such as the climate.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.016	IM – Integrated Management	IM–P14	Amend	We support the preservation of opportunities for future generations... this RPS must acknowledge, and seek to limit, reduce and phase out the resource inputs and uses that drive this overstretch (specifically synthetic nitrogen fertiliser and intensive dairy farming).
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.017	IM – Integrated Management	IM–P15	Support	We support the adoption of the precautionary approach. That’s why the RPS needs to go hard, and phase out synthetic nitrogen fertiliser, improve river flows, to reclaim wild river margins from farming and support regenerative agriculture.
FPI008	Green Peace Aotearoa + 1259 supporters	FPI008.021	IM – Integrated Management	IM–AER1	Support	We support monitoring to show limits and thresholds set for human activities are adhered to and result in environmental wellbeing and resilience.
FPI015	PF Olsen	FPI015.001	DEF - Definitions	Definitions	Amend	Allow NES-PF definition for earthworks to prevail in situations where plantation forestry activities are being carried out
FPI015	PF Olsen	FPI015.002	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-15	Amend	Change wording of the final bullet point to remove the reference to exotic afforestation as other changes to land use can also impact water flows and retention patterns.

FPI015	PF Olsen	FPI015.003	CE - Coastal Environment	CE-M3	Amend	Remove “including the impacts of harvesting plantation forestry” from 4.d.ii
FPI015	PF Olsen	FPI015.004	CE - Coastal Environment	CE-M4	Amend	Amend the current wording. Allow NES-PF definition for earthworks to prevail in situations where plantation forestry activities are being carried out
FPI015	PF Olsen	FPI015.005	LF-LS - Land and soil	LF-LS-M12	Amend	Either include controls for other land use changes (e.g. conversion to indigenous forest, or conversion to sheep & beef farming etc) OR remove 1A in regards to only controlling plantation forestry activities
FPI015	PF Olsen	FPI015.006	ECO - Ecosystems and Biodiversity	ECO-P9	Support	Retain as notified
FPI015	PF Olsen	FPI015.007	ECO - Ecosystems and Biodiversity	ECO-E1	Amend	Include a footnote explaining Section 32 analysis in paragraph 3
FPI015	PF Olsen	FPI015.008	HAZ - Hazards and Risks	HCV-HH-M5	Amend	Delete the need to obtain a resource consent. Point plan users to Heritage New Zealand and the need to obtain an Archaeological Authority.
FPI015	PF Olsen	FPI015.011	HAZ - Hazards and Risks	HCV-HH-M4	Amend	Delete the need to obtain a resource consent. Point plan users to Heritage New Zealand and the need to obtain an Archaeological Authority.
FPI015	PF Olsen	FPI015.009	NFL - Natural Features and Landscapes	NFL-P5	Support	Retain as notified
FPI015	PF Olsen	FPI015.010	Appendices	APP5	Amend	Remove generic pine and larch species from the list. Remove Radiata pine from the list
FPI007	John Highton	FPI007.020	MW - Mana Whenua	MW-M1	Support	I support close collaboration with Ngāi Tahu on environmental matters.
FPI007	John Highton	FPI007.021	MW - Mana Whenua	MW-M1	Amend	Amend to provide for the substantial recognition and environmental improvement for sites identified in MW – M1.
FPI007	John Highton	FPI007.022	SRMR - Significant resource management issues for the region	Introduction	Amend	At the top of page 66, add ongoing loss of wetlands and tussock uplands as additional significant resource issues for the region.
FPI007	John Highton	FPI007.023	SRMR - Significant resource management issues for the region	SRMR-I2	Amend	Specify reduced river flows as reduced water reliability is too vague.
FPI007	John Highton	FPI007.024	SRMR - Significant resource management	SRMR-I2	Amend	Include increased algal growth and algal blooms as recognised hazards

			issues for the region			
FPI007	John Highton	FPI007.025	SRMR - Significant resource management issues for the region	SRMR-I2	Amend	Include altered chemical composition of lakes due to the melting of glaciers and permanent snow as an effect of climate change in this pre-amble
FPI007	John Highton	FPI007.026	SRMR - Significant resource management issues for the region	SRMR-I4	Amend	Emphasis on the value of urban waterways throughout the document is required. The protection and enhancement of urban waterways should feature more strongly in the RPS
FPI007	John Highton	FPI007.027	SRMR - Significant resource management issues for the region	SRMR-I10	Amend	Amend so that Hydro-electricity generation have tightened requirements and power companies have to increase mitigation of their effects.
FPI007	John Highton	FPI007.028	SRMR - Significant resource management issues for the region	SRMR-I11	Support	Much improved monitoring and testing. A pro-active approach rather than the current passive approach. Listening and responding to input from concerned members of the public
FPI007	John Highton	FPI007.029	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I2	Amend	Amend to include separate recognition that in many cases that current management does not meet the cultural expectations of the rest of the community as well
FPI007	John Highton	FPI007.030	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I4	Support	Retain as notified
FPI007	John Highton	FPI007.031	RMIA - Resource management issues of significance to iwi authorities in the region	RMIA-WAI-I5	Amend	Amend to greatly improve coordination of planning and communication with other agencies such as DOC, the Access Commission, LINZ and others
FPI007	John Highton	FPI007.032	RMIA - Resource management issues of significance to iwi	RMIA-MKB-I1	Amend	Amend to include that together with other agencies carefully regulate commercial exploitation of important native species including whitebait, eels, freshwater crayfish. Together with other agencies investigate and monitor runs of smelt into Otago estuaries and take steps to ensure that they have a healthy environment for breeding.

			authorities in the region			
FPI007	John Highton	FPI007.033	IM- Integrated Management	IM-P2	Support	Retain as notified
FPI007	John Highton	FPI007.034	IM- Integrated Management	IM-P3	Amend	Amend to include recognition of valued introduced species.
FPI007	John Highton	FPI007.035	IM- Integrated Management	IM-P6	Amend	This should be combined with taking a precautionary approach when adequate data is lacking.
FPI007	John Highton	FPI007.036	IM- Integrated Management	IM-P7	Support	Retain as notified
FPI007	John Highton	FPI007.037	IM- Integrated Management	IM-P14	Amend	Amend IMP – 14(3) to include more support for active monitoring of the environment.
FPI007	John Highton	FPI007.038	IM- Integrated Management	IM-P15	Support	Retain as notified
FPI007	John Highton	FPI007.039	IM- Integrated Management	IM-AER1	Support	Retain as notified
FPI007	John Highton	FPI007.040	CE - Coastal Environment	CE-O1	Support	Retain as notified
FPI007	John Highton	FPI007.041	CE - Coastal Environment	CE-O2	Support	Retain as notified
FPI007	John Highton	FPI007.042	CE - Coastal Environment	CE-O3	Support	Retain as notified
FPI007	John Highton	FPI007.043	CE - Coastal Environment	CE-O4	Support	Retain as notified
FPI007	John Highton	FPI007.044	CE - Coastal Environment	CE-O5	Support	Retain as notified
FPI007	John Highton	FPI007.045	CE - Coastal Environment	CE-P5	Amend	Amend CE – P5(2)(d) to include the protection and remediation of the estuaries, lagoons and coastal wetlands associated with both mouths of the Clutha.
FPI007	John Highton	FPI007.046	CE - Coastal Environment	CE-P8	Amend	The RPS should note that when planting is being planned that consideration should be given to maintaining access to and along the margin of water bodies.
FPI007	John Highton	FPI007.047	CE - Coastal Environment	CE-P11	Amend	Add provision for consideration given to pollution/environmental degradation caused by aquaculture such as salmon farming
FPI007	John Highton	FPI007.048	CE - Coastal Environment	CE-M2	Amend	Include both mouths of the Clutha/Mata-au in Table 2

FPI007	John Highton	FPI007.049	CE - Coastal Environment	CE-M3	Amend	Amend CE-M3 so that the wording is “ <u>discover and map</u> areas of deteriorated water quality...”. To get an accurate map more testing will need to be done
FPI007	John Highton	FPI007.050	CE - Coastal Environment	CE-M3	Amend	Amend to include specific mention of agricultural discharges into estuaries and coastal lagoons
FPI007	John Highton	FPI007.051	CE - Coastal Environment	CE-M3	Amend	Amend CE – M3(11) to allow for controlled grazing of stock where this is necessary and appropriate.
FPI007	John Highton	FPI007.052	LF-WAI - Te Mana o te Wai	LF-WAI-P2	Support	Retain as notified
FPI007	John Highton	FPI007.053	LF-WAI - Te Mana o te Wai	LF-WAI-P3	Amend	With other regulatory bodies ensure protection of eels, freshwater crayfish, whitebait and migratory smelt.
FPI007	John Highton	FPI007.054	LF-WAI - Te Mana o te Wai	LF-WAI-P3	Amend	A new section of the RPS needs to be generated that recognises the cultural significance of valued introduced species and provides for protecting the environment for these species such as game fish and birds. This is separate from Mahika Kai but follows the same principles relating to gathering healthy food from a healthy environment
FPI007	John Highton	FPI007.055	LF-VM - Visions and management	LF-VM-M3	Amend	Interact with and encourage development of Catchment Groups and Catchment Plans. Provide coordination to ensure that there are not too many different organisations working to separate plans in the same catchment.
FPI007	John Highton	FPI007.056	LF-FW - Freshwater	LF-FW-P13	Amend	Work with other relevant bodies, of which there are many, to develop a plan for maintenance of the Waitaki riverbed that includes maintenance of natural character and braiding
FPI007	John Highton	FPI007.057	LF-FW - Freshwater	LF-FW-P14	Amend	Amend LF-FW-P14(4) to ensure that when plans are made for native planting of water margins that provision is made for access to the water margin and along the water margin. Avoid putting large obstructive plants immediately adjacent to water margins.
FPI007	John Highton	FPI007.062	LF-LS - Land and soil	LF-LS-P22	Amend	Amend LF-LS-P22 to consider public access when planting water margins
FPI007	John Highton	FPI007.058	LF-LS - Land and soil	LF-LS-M11	Amend	Amend LF-LS-M11(a) so that individual farm plans should be informed by a related catchment plan.
FPI007	John Highton	FPI007.059	LF-LS - Land and soil	LF-LS-M12	Support	Retain as notified
FPI007	John Highton	FPI007.060	ECO - Ecosystems and Biodiversity	ECO-M6	Support	ORC to ensure that it has good systems for engagement with the public and response to those engagements
FPI007	John Highton	FPI007.061	EMON – Monitoring the efficiency and effectiveness of the policy statement	General submission	Support	Ensure a very active monitoring programme is put into effect