



Further Submission

3 February 2023

TO THE

Otago Regional Council

ON THE

**Proposed Otago Regional Policy
Statement
Freshwater Planning Instrument**

BY

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

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

Clause 8 of First Schedule, Resource Management Act 1991

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

Further Submission

A. Introduction

1. Beef + Lamb New Zealand Ltd (B+LNZ) and the Deer Industry New Zealand (DINZ) (collectively referred to forthwith as 'the submitters') welcome the opportunity to make a further submission on the proposed Otago Regional Policy Statement Freshwater Planning Instrument Parts (pORPS-FPI).

B. Form 6

2. B+LNZ and DINZ could not gain an advantage in trade competition through this further submission.
3. B+LNZ and DINZ are making this further submission because, as industry good organisations representing New Zealand's sheep and beef and deer famers. The submitters have an interest in this process which is greater than the general public interest.
4. The specific provisions of the pORPS-FPI that B+LNZ and DINZ's further submission relates to and the decisions it seeks from Council are as detailed on the following pages. The outcomes sought and the wording used is with the intention that the relief be granted on that basis 'or words to that effect'. Accordingly, the outcomes sought may require consequential changes or restructuring of pORPS-FPI, or parts thereof, to give effect to the relief sought.
5. B+LNZ and DINZ wishes to be heard in support of their further submission and, are willing to consider presenting a joint case at hearing with other submitters addressing similar issues.
6. This further submission is authorised by B+LNZ and DINZ . Copies will be served on the party that made the original submission to which it relates within 5 working days of today's date.

Lilly Lawson
Senior Environment Policy Analyst
Beef + Lamb New Zealand Limited

Further submission in support of, or in opposition to, submission on notified proposed Otago Regional Policy Statement Proposed Freshwater Planning Instrument Parts						
Submitter Name	Submitter Number	Submitter Point	Provision	B+LNZ and DINZ submission is that:		The decision that B+LNZ and DINZ would like Otago Regional Council to make and relief sought:
				SUPPORT/O PPOSE	REASON	
Director General of Conservation	FPI044	006	LF-WAI-P1	Oppose	<p>The proposed amendment to the LF-WAI-<i>Te Mana o te Wai</i> chapter is contrary to a contextual interpretation and application of the integrated management provisions of the pORPS and does not align with the priorities in clause 1.3(5) of the NPS-FM.</p> <p>Integrated management is central to the purpose of the RPS (section 59 RMA). The integrated management of land and freshwater addresses the interconnectedness of the ecosystems of these natural resources. The management of the use of these resources for the production of food and fibre is a priority for human health and for the social, economic and cultural well-being of people and communities. These are also the second and third priorities of <i>Te Mana o te Wai</i> (clause 1.3(5)) of the NPSFM. On a contextual interpretation of the pORPS, the provisions of the LF- Land and freshwater chapter must be aligned with the provisions of the IM-Integrated management chapter and should purport not override them.</p>	That this submission be disallowed.
Fish & Game	FPI037	048	GEN	Conditionally oppose	<p>It is unclear what the submitter means when submitting the concepts of TMOTW be adopted for the whole environment.</p> <p>To the extent the submission reflects B+LNZ's and DINZ's support of the integrated management provisions in the pORPS, particularly as it relates to the production of food, it is not opposed. To the extent it does not it is opposed.</p>	The submission only be allowed if it is consistent with relief sought by B+LNZ.

Federated Farmers of New Zealand	FP1026	039	GEN	Support	B+LNZ supports this statement in its entirety.	Allow the submission.
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