

3 February 2023

Otago Regional Council
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New Zealand
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Otago Regional Council – Proposed Otago Regional Policy Statement 2021 Freshwater Planning
Instrument – Further Submission

Please find enclosed the further submission by the Director-General of Conservation *Tumuaki Ahurei* in respect of the Proposed Otago Regional Policy Statement 2021 Freshwater Planning Instrument. The further submission identifies the Director-General's concerns.

Please contact Murray Brass in the first instance if you wish to discuss any of the matters raised in this submission via mbrass@doc.govt.nz or on 027 213 3592.

Yours sincerely,



Aaron Fleming

Kaihautū Matarautaki Director Operations – Southern South Island

Te Papa Atawhai Department of Conservation

Form 6

Further submission in support of, or in opposition to, submissions on proposed Otago Regional Policy Statement – Freshwater Planning Instrument Parts [Clause 8](#) of Schedule 1, Resource Management Act 1991

To Otago Regional Council

Name of person making further submission: Penny Nelson, Director-General of Conservation
Tumuaki-Ahurei

This is a further submission in support of (or in opposition to) submissions on the following proposed Otago Regional Policy Statement – Freshwater Planning Instrument Parts (the **proposal**):

I am

- *a person representing a relevant aspect of the public interest; and*
- *a person who has an interest in the proposal that is greater than the interest the general public has.*

I come within this category as I represent a public interest in conservation, and have an interest in the proposal greater than the general public due to my statutory responsibilities for conservation.

I support or oppose the submissions of:

Te Rūnanga o Ngāi Tahu, Submission Number FPI032

Contact: Jessica.riddell@ngaitahu.iwi.nz

Otago Fish and Game Council , Submission Number FPI037

Contact: Nigel Paragreen, Environmental Officer

Email: nparagreen@fishandgame.org.nz

Postal address: PO Box 76, Dunedin, 9016

Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively Kāi Tahu ki Otago or Kā Rūnaka) Submission number FPI030

Contact: Sandra McIntyre, Aukaha (1997) Ltd

PO Box 446

Dunedin 9054

Email: sandra@aukaha.co.nz

Royal Forest and Bird Protection Society NZ (Forest & Bird) Submission Number FPI045

Contact for service: Chelsea McGaw, Regional Conservation Manager Otago & Southland

Email: c.mcgaw@forestandbird.org.nz

DairyNZ Limited Submission Number FPI024

Contact: Carina Ross, Senior Policy Advisor

Email: Carina.ross@dairynz.co.nz

Address: 24 Millpond Lane, Lincoln 7608

Federated Farmers Submission Number FPI026

Contact: Eleanor Linscott Southern Regional Policy Manager Federated Farmers

Email: elinscott@fedfarm.org.nz

Postal Address: PO Box 5242 Dunedin 9058 New Zealand

The particulars of the submissions that I support or oppose, along with my reasons, are set out in the following table:

Original submitter name	Original Submission Point Number	The particular parts of the submission I support are:	Support or Oppose	The reasons for my support/opposition	I seek that the whole (or part [<i>describe part</i>]) of the submission be allowed (or disallowed):
Te Rūnanga o Ngāi Tahu	FPI032.014	<p>LF – Land and Freshwater LF-WAI-O1 - Te Mana o te Wai Amend as follows: 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: ... (4) <u>freshwater, and land and coastal waters</u> have a connectedness that supports and perpetuates life, and Add further clause as follows: (6) <u>all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.</u></p>	Support	The proposed changes help to differentiate between freshwater and coastal water, and recognises that there is connectedness between freshwater and coastal waters, as well as between those waters and land. The mauri of Otago’s water bodies and their health and wellbeing is everyone’s responsibility.	Whole is allowed
Te Rūnanga o Ngāi Tahu	FPI032.016	<p>LF–WAI–PR1 – Principal reasons – Paragraph 1 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)</p>	Support	The D-G supports the use of te reo Māori throughout the document and those amendments proposed by Te Rūnanga o Ngāi Tahu.	Whole is allowed

Te Rūnanga o Ngāi Tahu	FPI032.018	LF-VM – Visions and Management – General In partnership with mana whenua, prepare a new overarching region-wide vision 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.	Support	The D-G supports the inclusion of a new overarching region-wide vision and a reduced timeframe for visions to be achieved.	Whole is allowed
Te Rūnanga o Ngāi Tahu	FPI032.019	LF-VM-O2 – Clutha Mata-au FMU Vision Amend to provide an overarching vision for Clutha Mata-au and consequential amendments to only highlight differences between rohe	Support	The D-G supports the inclusion of an overarching vision for Clutha Mat-au due to its cultural significance and recognition of the Statutory Acknowledgment for Mata-au (Clutha River)	Whole is allowed
Te Rūnanga o Ngāi Tahu	FPI032.022	LF-FW-O8 – Fresh water Amend LF-FW-O8 as follows: In Otago’s water bodies and their catchments: <i>(1) the health of the wai supports the health of the people and thriving mahika kai,</i> <i>(2) water flow is continuous throughout the whole system,</i> <i>(3) the interconnection of <u>land</u>, fresh water (including groundwater) and coastal waters is recognised, ...</i>	Support	The D-G supports the proposed amendment to include land as part of the catchment and its importance to and connection with water.	Whole is allowed

Original submitter name	Original Submission Point Number	The particular parts of the submission I support are:	Support or Oppose	The reasons for my support/opposition	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed):
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Otago Fish and Game Council	FPI037.002	<p>Definition: natural environment: <u>Natural environment means:</u> <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> Plus, consequential changes as referenced in the reasoning section.</p>	Support in part	It is useful to define the term natural environment and to be consistent with other relevant legislation. The D-G supports the inclusion of a new definition with the same or similar wording.	Whole is allowed
Otago Fish and Game Council	FPI037.003	<p><u>Minimise means to reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</u></p>	Support in part	It is useful to define the term 'minimise' and to be consistent with other relevant legislation. The D-G supports the inclusion of a new definition with the same or similar wording.	Whole is allowed
Otago Fish and Game Council	FPI037.004	<p><u>Precautionary approach means an approach that:</u> <u>(a) avoids not acting due to uncertainty about the quality of quantity of the information available,</u> <u>and (b) interprets uncertain information in a way that best supports the health, well-being and resilience of the natural environment</u></p>	Support in part	It is useful to define the term 'precautionary approach' and to be consistent with other relevant legislation. The D-G supports the inclusion of a new definition with the same or similar wording.	Whole is allowed
Otago Fish and Game Council	FPI037.005	<p><u>Restore means to return to a state of good health, well-being and resilience.</u></p>	Support in part	It is useful to define the term 'restore' and to be consistent with other relevant legislation. The D-G supports the inclusion of a new	Whole is allowed

				definition with the same or similar wording.	
Otago Fish and Game Council	FPI037.027	Delete and redraft the following sections: Explanation, principal reasons, and anticipated environmental results.	Support	The D-G supports the general submission to redraft these sections to ensure that the PORPS: Recognises and provides for the matters of national importance listed in section 6 of the Act and has particular regard to the other matters in section 7 of the Act. b. Gives effect to the New Zealand Coastal Policy Statement and the National Policy Statement for Freshwater Management. c. Promotes through an integrated approach the sustainable management of natural and physical resources. d. Implements and promotes sound resource management practice through necessary and appropriate objectives, policy and methods.	Whole is allowed
Otago Fish and Game Council	FPI037.028- FPI037.047	Include definitions in the Freshwater Planning instrument	Support in part	The D-G supports this submission point as it is useful to include definitions in the Freshwater Planning Instrument, but there is need to ensure that the definitions are the same for each section.	Whole is allowed
Otago Fish and Game Council	FPI037.006	SRMR – Interacting with water bodies <u>SRMR-I12 – Social, cultural and economic wellbeing of Otago’s communities depends on</u>	Support	The D-G supports the inclusion of this issue as the inclusion will help to ensure that the PORPS: Recognises	Whole is allowed

		<p><u>use and development of natural and physical resources Statement</u> <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. Context</u> <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. 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. Impact snapshot Environmental 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</u></p>		<p>and provides for the matters of national importance listed in section 6 of the Act and has particular regard to the other matters in section 7 of the Act.</p> <p>b. Gives effect to the New Zealand Coastal Policy Statement and the National Policy Statement for Freshwater Management.</p> <p>c. Promotes through an integrated approach the sustainable management of natural and physical resources.</p> <p>d. Implements and promotes sound resource management practice through necessary and appropriate objectives, policy and methods</p>	
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Otago Fish and Game Council	FPI037.007	<p>SRMR - Significant resource management issues for the region</p> <p>Add sentence to the Environmental section: ... between species and their habitat. <u>The sum of these impacts affects the overall health, well-being and resilience of the water body.</u> How much an ecosystem...</p> <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>Alternatively, Fish & Game seek that the wording in SRMR I5 are altered to recognise and provide</p>	Support	<p>The D-G supports the inclusion of this issue as the inclusion will help to ensure that the PORPS: Recognises and provides for the matters of national importance listed in section 6 of the Act and has particular regard to the other matters in section 7 of the Act.</p> <p>b. Gives effect to the New Zealand Coastal Policy Statement and the National Policy Statement for Freshwater Management.</p> <p>c. Promotes through an integrated approach the sustainable</p>	Whole is allowed

		<p>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>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 values</u> 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>		<p>management of natural and physical resources.</p> <p>d. Implements and promotes sound resource management practice through necessary and appropriate objectives, policy and methods</p>	
Otago Fish and Game Council	FPI037.008	<p>SRMR - Significant resource management issues for the region</p> <p>SRMR-16 Alternatively, Fish & Game seek that the wording in SRMR 16 are altered to recognise and provide for the links between health, well-being and recreation – including angling and hunting. In</p>	Support	The D-G supports the alternative wording proposed to SRMR-16.	Whole is allowed

		<p>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>			
Otago Fish and Game Council	FPI037.014	<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. For example: 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,</u></p>	Support in part	The D-G supports the inclusion of a new overarching region-wide vision and a reduced timeframe for visions to be achieved.	Whole is allowed

		<p><u>sedimentation and flows, mimics that of their natural behaviour, (4) ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored, (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, (6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments, insofar as each goal is consistent with that of indigenous species, catchments, (7) the habitat of trout and salmon is protected and restored, and trout and salmon are able to migrate easily within and between (8) food is available to be harvested from water bodies in abundance and is safe to consume, (9) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies, (10) there are no direct discharges of waste water to water bodies, and (11) fresh water is managed in accordance with the LF-WAI objectives and policies. (7) Consequential relief to remove parts of LF-VM-O2 to LF-VM-O6 that duplicate direction in LF-VM-AO2.</u></p>			
Otago Fish and Game Council	FPI037.015	<p><u>(1a) the health, well-being and resilience of water bodies is prioritised, ...</u> <u>(4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected and restored, and</u></p>	Support in part	The D-G supports the restoration of native fish habitat and fish passage provided that fish passage does not result in negative effects from non-native species on non-migratory fish species.	Allowed in part

		<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>			
Otago Fish and Game Council	FPI037.016	And amend LF-FW-09: (2) there is no decrease in the range and diversity of habitats and indigenous ecosystem types and habitats in natural wetlands,	Support	The D-G supports the proposed wording or similar.	Whole is allowed
Otago Fish and Game Council	FPI037.019	(1) the health, and well-being <u>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) the habitats of indigenous species associated with water bodies are <u>protected and restored</u> , including by providing for fish passage (2a) the habitat of trout and salmon, including fish passage, is protected and restored insofar as it is consistent with (2),... (4) mahika kai, <u>wild harvested food</u> and drinking water are safe for human consumption, (5) existing over-allocation is phased out and future over-allocation is avoided, and (6) fresh water is allocated within environmental limits and used efficiently., <u>and</u> <u>(7) discharges to freshwater are allocated within environmental limits</u> and used efficiently., <u>and</u> <u>(7) discharges to freshwater are allocated within environmental limits</u>	Support	The D-G supports the proposed wording to protect and restore waterbodies as it will <ul style="list-style-type: none"> • promote through an integrated approach the sustainable management of natural and physical resources and; • Implement and promote sound resource management practice through necessary and appropriate objectives, policy and methods. 	Whole is allowed

Otago Fish and Game Council	FPI037.020	... require, wherever practicable, the adoption of water sensitive urban design techniques when managing the <u>existing subdivision, use or development of land in urban areas,</u> (3a) <u>require the adoption of water sensitive urban design techniques when managing new subdivision, use or development or land in urban areas, and ...</u>	Support	The D-G supports the proposed wording to 'require the adoption of water sensitive urban design techniques when managing new subdivision, use or development or land' but does not agree that this should only be limited to land in urban areas.	Allowed in part
Otago Fish and Game Council	FPI037.021	<u>LF-FW-Mx – Identifying and managing species interactions between trout and salmon and indigenous species</u> <u>(1) Local authorities: (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>	Support	The D-G supports the inclusion of a new method that will promote through an integrated approach the sustainable management of natural and physical resources and; Implement and promote sound resource management practice through necessary and appropriate objectives, policy and methods.	Whole is allowed

		<p><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></p> <p><u>(i) determine information needs to manage the species, and</u></p> <p><u>(ii) determine short, medium and long term objectives, and (iii) determine appropriate management actions that will achieve objectives determined in (ii) and account for habitat needs, and (iv) use tools available within the Conservation Act 1987, where appropriate</u></p>			
Otago Fish and Game Council	FPI037.023	Map 1 Provide an accompanying descriptive text defining the spatial extent of the FMUs and Rohe.	Support	The D-G supports changes to the map that will help interpretation for the users.	Whole is allowed
Otago Fish and Game Council	FPI037.060	Fish and Game also seeks relief to resolve drafting issues within the vision objectives	Support	The D-G supports changes to the vision objectives to ensure that the document is easily understood.	Whole is allowed
Otago Fish and Game Council	FPI037.061	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.	Support	The D-G supports reduced timeframes to achieve visions.	Whole is allowed

Original submitter name	Original Submission Point Number	The particular parts of the submission I support are:	Support or Oppose	The reasons for my support/opposition	I seek that the whole (or part [<i>describe part</i>]) of the submission be allowed (or disallowed):

<p>Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively Kāi Tahu ki Otago or Kā Rūnaka)</p>	<p>FPI030.015</p>	<p>LF-WAI - Te Mana o te Wai Amend as follows: 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: ... (1) <u>freshwater, and land and coastal waters</u> have a connectedness that supports and perpetuates life ... Add further clause to read: <u>(6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.</u></p>	<p>Support</p>	<p>The D-G supports the proposed wording as it emphasises the connection between freshwater and coastal water and who is responsible for the quality of the resource</p>	<p>Whole is allowed</p>
<p>Kāi Tahu ki Otago or Kā Rūnaka</p>	<p>FPI030.016</p>	<p>LF-WAI-P1 Amend as follows: In all management of fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies, freshwater ecosystems, te hauora o te wai, <u>and the contribution of this to 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; interacting with water through ingestion (such as drinking water and consuming harvested resources <u>harvested from the water body</u>) and immersive activities (such as harvesting resources and bathing), and ...</p>	<p>Support</p>	<p>The D-G supports the proposed wording changes.</p>	<p>Whole is allowed</p>

Kāi Tahu ki Otago or Kā Rūnaka	FPI030.017	LF-WAI-PR1 Amend as follows: Paragraph 1, 2nd sentence: ... This places the mauri (life-force) of the water at the forefront of decision making, recognising that te hauora o te wai (the health of the water) is the first priority ... Paragraph 1, last sentence: ... Giving effect to Te Mana o te Wai requires actively involving takata mana whenua in freshwater planning and management.	Support	The D-G supports the proposed wording changes.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.047	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).	Support	The D-G supports Kāi Tahu ki Otago's relationship to wai māori (freshwater) and the importance of Te Mana o te Wai.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.048	Amendments to the proposed integrated management approach and support a holistic approach to managing all parts of the natural environment, including fresh and coastal waters, indigenous species and ecosystems, whenua/soil and air, and recognise and reflect the interconnectedness between these components.	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.052	LF-VM - Visions and management An overarching vision for key values that applies to all FMUs. If a completely separate vision is to be retained for each FMU, Kā Rūnaka request that the visions be reviewed to make them more	Support	The D-G supports the inclusion of an overarching vision that applies to all FMUs.	Whole is allowed.

		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.			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.051	Kā Rūnaka consider the timeframes for action should require practises to change within 10 years and visions to be achieved within 20 years.	Support	The D-G supports the proposed reduction to the timeframes for achieving freshwater visions.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.019	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 • 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 	Support	The D-G supports stronger LF-VM provisions to ensure that mahika kai species do not contain contaminants that would make them unsafe to eat and that the water body is sufficiently clear of sediment to enable safe access.	Whole is allowed

		<ul style="list-style-type: none"> • Sustaining the natural form and function of the water bodies • Sustainable land and water management practices • Ceasing direct discharges of wastewater to water bodies. 			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.014	<p>RMIA-WAI-I3</p> <p>Amend as follows: 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> <p>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></p>	Support	The D-G supports the inclusion of wording that recognises the effects of commercial fishing on indigenous fish species.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.017	<p>LF-WAI-PR1</p> <p>Amend as follows: Paragraph 1, 2nd sentence: ... This places the mauri (life-force) of the water at the forefront of decision making, recognising <u>that te hauora o te wai</u> (the health of the water) is the first priority ...</p> <p>Paragraph 1, last sentence: ...</p>	Support	The D-G supports the proposed wording changes.	Whole is allowed

		Giving effect to Te Mana o te Wai requires actively involving takata <u>mana</u> whenua in freshwater planning and management.			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.020	<p>LF-VM-O2</p> <p>Amend as follows: 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>	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed

		<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, (13)(7) in addition to (1) to (12)(6) above: (a) in the Upper Lakes rohe, the high-quality waters of the lakes and their tributaries are protected, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community, (b) in the Dunstan, Manuherekia and Roxburgh rohe: (i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and (ii) innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and (iii) sustainable abstraction occurs from main stems or groundwater in preference to tributaries, (c) in the Upper Lakes and 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, and (ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, wherever possible, restored, (iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and (iv) there are no</u></p>			
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		<p>direct discharges of wastewater to water bodies, and (14)(8) the outcomes sought in (7) are to be achieved within the following timeframes: by 2030 in the Upper Lakes rohe, and by 2045 in the Dunstan, Manuherekia, Roxburgh and Lower Clutha rohe, and by 2050 in the Manuherekia rohe.</p>			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.021	<p>LF-VM-O3 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> (5) 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>(Y) there are no direct discharges of wastewater to water bodies, and</u> <u>(6) food production in the area is supported by innovative and sustainable land and water management practices support food production in the area and that improve resilience to the effects of climate change.</u></p>	Support	The D-G supports the proposed reduction to the timeframes for achieving freshwater visions.	Whole is allowed

		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			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.022	<p>LF-VM-O4</p> <p>Amend as follows: By 2050 <u>2045</u> in the Taiari <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></p> <p>Tunaheketaka/Lake Taiari, scroll plain, and tussock areas, the gravel bed of the lower Taiari <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>(6) water bodies support healthy populations of <u>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</u></p>	Support	The D-G supports the proposed reduction to the timeframes for achieving freshwater visions.	Whole is allowed

		<p><u>and mahika kai species are safe for consumption,</u> (7) ... (8) <u>food production in the area is supported by innovative and sustainable land and water management practices</u> support food production in the area <u>and that</u> improve resilience to the effects of climate change.</p>			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.023	<p>LF-VM-O5 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 <u>water bodies are safe for human contact and mahika kai species are safe for consumption, and</u> (X) <u>there are no direct discharges of wastewater to water bodies.</u></p> <p>Also see submission on MAP1: If the Waikouaiti catchment is included in the Dunedin and Coast FMU, include recognition of management outcomes for the Waikouaiti freshwater mātaimai and the East Otago Taiāpure in the objective.</p>	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.024	<p>LF-VM-O6 Amend as follows: By 2030 in the Catlins FMU: (1) ... (2) ...</p>	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed

		<p>(3) water bodies support thriving mahika kai <u>that is safe for consumption</u>, and 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>, (5) ...</p> <p><u>(Y) there are no direct discharges of wastewater to water bodies</u>, and (6) ...</p>			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.028	<p>LF-FW-08</p> <p>Amend as follows: In Otago's water bodies and their catchments:</p> <p>(2) ...</p> <p>(3) the interconnection of <u>land</u>, fresh water (including groundwater) and coastal waters is recognised, native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected <u>and sustained</u>,</p>	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed.
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.029	<p>LF-FW-09</p> <p>Amend as follows: Otago's natural wetlands are protected or restored so that:</p> <p>(1) ...</p> <p>(2) there is no decrease in the <u>range extent</u> and diversity of indigenous ecosystem types and habitats in natural wetlands,</p> <p>(3) there is no reduction in their ecosystem health, hydrological functioning, amenity values,</p>	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed.

		extent or water quality, and if <u>these have been degraded</u> , they are improved, and their flood attenuation <u>and water storage</u> capacity is maintained.			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.030	LF-FW-P7 Amend as follows: Environmental outcomes, attribute states (including target attribute states) states), <u>environmental flows and levels</u> , and limits ensure that: (1) ... (2) the habitats of indigenous species associated with water bodies are protected <u>and sustained</u> , including by providing for fish passage, ... (6) <u>allocation of fresh water is allocated</u> within environmental limits and <u>water is used</u> efficiently	Support	The D-G supports the inclusion of appropriate environmental flows and levels and the sustainable management of natural and physical resources.	Whole is allowed.
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.031	LF-FW-P9 Amend as follows: Protect natural wetlands by: (1) avoiding a reduction in their values or extent unless: (a) the loss of values or extent arises from: ... (v) ... the maintenance of <u>or</u> operation of specific <u>specified</u> infrastructure, or other infrastructure ...	Support	The D-G supports the proposed wording change to reflect the NPS-FM 2020 wording.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.033	LF-FW-P15 Replace with two policies as follows: <u>LF-FW-P15 – Discharges containing animal effluent, sewage and other human wastes, and industrial and trade waste</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:	Support	The D-G supports the separation of wastewater and stormwater policies to improve clarity and effectiveness.	Whole is allowed.

		<p><u>(1) 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><u>(2) phasing out existing direct discharges of sewage or industrial and trade wastes, whether treated or untreated, to fresh water, and</u></p> <p><u>(3) requiring discharges containing animal effluent to be to land,</u></p> <p><u>(4) requiring:</u> <u>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><u>(2) phasing out existing direct discharges of sewage or industrial and trade wastes, whether treated or untreated, to fresh water, and</u></p> <p><u>(3) requiring discharges containing animal effluent to be to land,</u></p> <p><u>(4) requiring:</u> <u>(c) on-site wastewater systems and animal effluent systems to be designed and operated in accordance with best practice standards,</u></p> <p><u>(d) that any discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe, and</u></p> <p><u>(5) promoting source control as a method for reducing contaminants in discharges containing industrial and trade waste.</u></p>			
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		<p><u>LF-FW-P15A – Stormwater discharges Minimise the adverse effects of direct and indirect discharges of stormwater to fresh water by:</u></p> <p><u>(1) requiring:</u></p> <p><u>(a) integrated catchment management plans for management of stormwater in urban areas,</u></p> <p><u>(b) stormwater to be discharged into a reticulated system where one is made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved (a) that all discharges containing sewage or industrial and trade waste are discharged into a reticulated wastewater system, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u></p> <p><u>(b) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring into reticulated wastewater systems,</u></p> <p><u>environmental outcomes,</u></p> <p><u>(c) consideration of the use of on-site systems to attenuate flow and filter stormwater prior to discharge into any reticulated system,</u></p> <p><u>(d) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring into reticulated stormwater systems,</u></p> <p><u>(e) on-site stormwater management systems to be in accordance with best practice standards,</u></p>		
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		<p><u>(f) stormwater to be managed so that any discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe, the use of water sensitive design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and</u></p> <p><u>(3) promoting source control as a method for reducing contaminants in discharges of stormwater</u></p>			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.034	<p>LF-FW-M6</p> <p>Amend as follows: 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:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) identify water bodies that are over-allocated in terms of either their water quality or quantity,</p> <p>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai, <u>support achievement of the vision for the Freshwater Management Unit set out in the LF-VM objectives</u> and provide for:</p> <p>(a) the <u>natural</u> behaviours of the water body including a base flow or level that provides for variability,</p> <p>(b) ...</p> <p>(c) ...</p>	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed.

		<p>(d) the hydrological connection with other water bodies, <u>wetlands</u>, estuaries and coastal margins,</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 long term 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 ... (8) ...</u></p>			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.037	<p>LF-FW-E3 (para 2)</p> <p>Amend as follows: Paragraph 2, 3rd sentence: ... 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 ...</p> <p>Paragraph 2, final sentence:</p>	Support	Recognises and provides for the matters of national importance listed in section 6 of the Act and has particular regard to the other matters in section 7 of the Act.	Whole is allowed

		... 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>			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.038	LF-FW-PR3 Amend as follows: Paragraph 1, final sentence: The legacy of Otago’s historical mining privileges, coupled with contemporary <u>urban and rural</u> land uses, contribute to ongoing water quality and quantity issues in some water bodies, with significant cultural effects. Paragraph 3: 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 ...	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.045	LF-FW- Freshwater General Submission 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 LFFW-O8 to frame such a vision. If a completely separate vision is to be	Support	The D-G supports an integrated approach to the sustainable management of natural and physical resources.	Whole is allowed

		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			
Kāi Tahu ki Otago or Kā Rūnaka	FPI030.045 (there are two submission points numbered FPI030.045 In the summary of decisions requested)	MAP1 1. 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.	Support	The D-G supports the inclusion of accurate mapping of coastal boundaries.	Allow

Original submitter name	Original Submission Point Number	The particular parts of the submission I support are:	Support or Oppose	The reasons for my support/opposition	I seek that the whole (or part [<i>describe part</i>]) of the submission be allowed (or disallowed):
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<p>Royal Forest and Bird Protection Society NZ (Forest & Bird) (FPI045)</p>	<p>FPI045.008</p>	<p>LF-VM - Visions and management Add a new overarching vision to apply to all FMUs in Otago as follows: <u>LF-VM-O1 – All of Otago catchment vision By no later than 2040, in all Otago catchments: (1) water bodies are protected at, or restored to a state of good health, well-being and resilience, (2) activities relating to water support the health, well-being and resilience of affected water bodies (3) the natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour, (4) ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored, (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, (6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments, (7) kai/food is available to be harvested from water bodies in abundance and is safe to consume, (8) people have abundant, quality opportunities to connect with and recreate within or close to a wide range of water bodies, (9) there are no direct discharges of untreated wastewater to water bodies, and (10) freshwater is managed in accordance with the LF-WAI objectives and policies.</u> Make the required consequential amendments to specific FMU visions in LF-VM-O2</p>	<p>Support</p>	<p>The D-G supports the inclusion of an overarching vision that applies to all FMUs.</p>	<p>Whole is allowed.</p>
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		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			
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Original submitter name	Original Submission Point Number	The particular parts of the submission I support are:	Support or Oppose	The reasons for my opposition	I seek that the whole (or part [<i>describe part</i>]) of the submission be allowed (or disallowed):
DairyNZ Limited	FPI024.017	LF-WAI-PR1 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 (support 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.	Oppose	The D-G supports the use of te reo Māori throughout the document. The removal of the te reo Māori translation weakens the intent of the proposed policy. Mauri does not only relate to health of the water.	Disallowed
DairyNZ Limited	FPI024.018	LF-WAI-AER2	Oppose	The D-G supports the use of te reo Māori throughout the	Disallowed

		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-01 – Te Mana o te Wai.		document. The removal of the te reo Māori translation weakens the intent of the proposed policy. Mauri does not only relate to health of the water.	
DairyNZ Limited	FPI024.019 and FPI024.020 and FPI024.021 and FPI024.022 And FPI024.023	LF-VM-O2 LF-VM-O3, LF-VM-O4, LF-VM-O5, LF-VM-O6 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.	Oppose	The D-G opposes the 50 year timeframe proposed given the current pressures on freshwater allocation and water quality.	Disallowed
DairyNZ Limited	FPI024.029	LF-FW-P7 Amend as follows: (3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 90 <u>80</u> % of rivers and 98 <u>95</u> % of lakes, and (b) by 2040, 95 <u>90</u> % of rivers and 100 <u>90</u> % of lakes, and	Oppose	The D-G opposes the reduced targets given the current pressures on freshwater allocation and water quality	Disallowed

Original submitter name	Original Submission Point Number	The particular parts of the submission I support are:	Support or Oppose	The reasons for my support/opposition	I seek that the whole (or part [<i>describe part</i>]) of the submission be allowed (or disallowed):
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Federated Farmers of New Zealand	FPI026.006	<p>SRMR-I5: Context Amend as follows (or similar): Freshwater, including rivers and streams, lakes, groundwater systems, and wetlands, is a finite resource critical to the region’s environment, society, and the economy. In Otago, access to, allocation, and use of freshwater reflects current demands and historical development <u>and associated demands “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-replenishment 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 degradation and bringing New Zealand’s freshwater resources, waterways and ecosystems to a healthy state within a generation. The NPS- FM also clarified</p>	Oppose	The D-G opposes the removal of the 5 year timeframe proposed given the current pressures on freshwater allocation and water quality.	Disallowed
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		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 <u>finally then</u> , the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.			
Federated Farmers of New Zealand	FPI026.007	SRMR-I5: Impact Snapshot Amend the following sentences as follows (or similar): 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	Oppose	The D-G opposes the removal of the descriptive text in this impact snapshot and the inclusion of the term freshwater. Freshwater abstraction can impact many ecosystems not only freshwater ecosystems.	Disallowed
Federated Farmers of New Zealand	FPI026.012	SRMR-16: Context Amend the following sentence as follows: 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 as soon as practicable, and bring New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation.	Oppose	The D-G opposes the removal of the 5 year timeframe proposed. As soon as practicable gives no certainty of when the water quality should be improved.	Disallowed
Federated Farmers of New Zealand	FPI026.013	SRMR-I6: Impact Snapshot – Environmental Amend as follows (or similar) (inferred): <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</u>	Oppose	The D-G opposes the removal of the reference to 'wintering cattle' as part of this SRMR when it has been identified as having adverse effects on freshwater.	Disallowed

		<p>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. 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. 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).</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 (North Otago), Owhiro Stream (Mosgiel), Kāikorai Stream (Dunedin), and sub-catchments within the lower Clutha catchment, have some of the worst poorest water quality in the region. The Waikouaiti River has the best water quality of the lowland sites.</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. Catchment group initiatives in Otago are making positive</p>			
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		<u>changes in terms of addressing water quality concerns in local areas.</u>			
Federated Farmers of New Zealand	FPI026.018	<p>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:</p> <p>(1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future, (3) each water body has a unique whakapapa and characteristics, (4) water and land have a connectedness that supports and perpetuates life, and Kāi Tahu exercise rakatirataka, manaakitaka and their kāitiakitaka duty of care and attention over wai and all the life it supports</p>	Oppose	The D-G opposes the proposed wording as it removes the focus from 'restoring degraded waterbodies' to 'restores the balance between water, the wider environment, and the community'. The change in wording results in a change to the intent of the objective which includes the restoration of degraded waterbodies.	Disallowed
Federated Farmers of New Zealand	FPI026.019	<p>Amend LF-WAI-P1 as follows: In all management of fresh water in Otago, prioritise:</p> <p>(1) first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and the hauora o te taiao, and the exercise of mana whenua to uphold these,⁴⁷</p> <p>(2) 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</p>	Oppose	<p>The D-G supports the use of te reo Māori throughout the document. The removal of the te reo Māori translation weakens the intent of the proposed policy.</p> <p>Te Hauora o te Taiao (the health of the environment), Te Hauora o te Wai (the health of the</p>	Disallowed

		the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.		waterbody) are important aspects of Te Mana o te Wai.	
Federated Farmers of New Zealand	FPI026.022	<p>Amend LF-VM-02 as follows (or similar) In the Clutha Mata-au FMU:</p> <p>... (6) the national significance of the Clutha hydro-electricity generation scheme is recognised, <u>(7) Management that enables adaptation of communities alongside waterways in a changing climate.</u> <u>(8) activities associated with the primary sector are recognised as having an important role in the FMU,</u> (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, (b) in the Dunstan, Manuherekia and Roxburgh rohe: (i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and (ii) innovative and sustainable land and water management practices support food production <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 (iii) sustainable abstraction <u>consistent with NOF values</u> occurs from main stems or groundwater in preference to tributaries, (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</p>	Oppose	The D-G opposes the removal of timeframes given the current pressures on freshwater allocation and water quality	Disallowed

		<p>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 preserved</u> 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>(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>			
Federated Farmers of New Zealand	FPI026.023	<p>Amend LF-VM-03 as follows (or similar)</p> <p>By 2050 in the <u>In consultation with the community and stakeholders a long-term vision is identified that means for the</u> North Otago FMU: 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,</p> <p>(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,</p> <p>(3) healthy riparian margins, wetlands, estuaries and lagoons</p> <p>(4) indigenous species can migrate easily and as naturally as possible to and from the coastal environment,</p> <p>(5) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p>	Oppose	The D-G opposes the removal of timeframes given the current pressures on freshwater allocation and water quality	Disallowed

		(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.			
Federated Farmers of New Zealand	FPI026.024	<p>Amend LF-VM-04 as follows (or similar)</p> <p>By 2050 in the <u>In consultation with the community and stakeholders a long-term vision is identified that means for the Taieri FMU:</u></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, 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> <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>	Oppose	The D-G opposes the separation of the scroll plain from the other waterbodies listed in this FMU. The D-G opposes the removal of timeframes given the current pressures on freshwater allocation and water quality	Disallowed
Federated Farmers of New Zealand	FPI026.025	<p>Amend LF-VM-05 as follows (or similar):</p> <p>By 2040 in the <u>In consultation with the community and stakeholders a long-term vision is identified that means for the Dunedin & Coast FMU:</u></p>	Oppose	The D-G opposes the removal of timeframes given the current pressures on freshwater allocation and water quality	Disallowed

Federated Farmers of New Zealand	FPI026.026	Amend LF-VM-06 as follows (or similar): <u>In consultation with the community and stakeholders a long term vision is identified that means for the By 2030 in the Catlins FMU:</u>	Oppose	The D-G opposes the removal of timeframes given the current pressures on freshwater allocation and water quality	Disallowed
Federated Farmers of New Zealand	FPI026.029	Delete policy LF-FW-09 Otago's natural wetlands are protected or restored so that: (1) mahika kāi and other mana whenua values are sustained and enhanced now and for future generations, (2) there is no decrease in the range and diversity of indigenous ecosystem types and habitats in natural wetlands, (3) there is no reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if degraded they are improved, and their flood attenuation capacity is maintained	Oppose	The D-G opposes the removal of this policy given the loss of extent and quality of wetland systems nationally and regionally.	Disallowed

I wish to be heard in support of my further submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of person making further submission.

Name: Aaron Fleming (pursuant to delegated authority)

Position: Director Operations Kaihautu Matarautaki, Southern South Island

Organisation: Department of Conservation Te Papa Atawhai

Date: 3 February 2023

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