



Federated Farmers of New Zealand

**Further Submission on Freshwater Planning
Instrument Parts of Proposed Otago Regional
Policy Statement (pORPS) 2021**

3 February 2023



**FURTHER SUBMISSION TO OTAGO REGIONAL COUNCIL ON
FRESHWATER PLANNING INSTRUMENT PARTS OF
PROPOSED OTAGO REGIONAL POLICY STATEMENT (pORPS)
2021**

Form 6

Further submission in support of, or in opposition to, submission on publicly notified
proposed policy statement or plan

Clause 8 of First Schedule, Resource Management Act 1991

To: *Otago Regional Council*

E: policy@orc.govt.nz

Name of further submitter: Federated Farmers of New Zealand – Otago Province

Contact person:

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A copy of our further submission will be served on the original submitter(s) within five working days after making the further submission to the local authority.

This is a further submission in support of, and opposition to, submissions on the following proposed plan, the Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement. Where Federated Farmers submitted on the same point as any other submitter it stands by its original submission. This Further Submission seeks only to provide Federated Farmers views on points raised by other submitters that are not already covered in our original submission.

Federated Farmers is:

- *An organisation representing a relevant aspect of the public interest;*
- *An organisation which has an interest in the proposal that is greater than the interest the general public has.*

Grounds for further submission:

Federated Farmers of New Zealand is a representative body for farmers, so both represents a

relevant aspect of the public interest and has an interest in the proposal that is greater than the interest that the general public has.

Federated Farmers supports or opposes the submissions of: Submitters stated in the table attached to this further submission.

The particular parts of the submissions Federated Farmers supports or opposes are: Variously stated with respect to respective submitters in the table attached to this further submission.

The reasons for our support or opposition are: Variously stated with respect to respective submitters in the table attached to this further submission.

We seek that the whole or part of the submissions be accepted or rejected: As variously stated with respect to respective submitters in the table attached to this further submission.

Federated Farmers wishes to be heard in support of its further submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

We acknowledge that by taking part in this public submission process the submission (including names and addresses) will be made public.

Where Federated Farmers submitted on the same submission point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers' views on points raised by other submitters.

| Sub No. | SubmitterNo/ Submitter Name | Provision | Summary of decision requested | Support/ Oppose | Reason for support or opposition |
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| Definitions | | | | | |
| | FPI042.140 Ngāi Tahu ki Murihiku | Def-Definition | 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. | Oppose | The definition of 'over-allocation' is consistent with the definition in the NPS-FM. |
| | Beef + Lamb (unnumbered as submitted in non-freshwater parts) | Def-Definition | Beef and Lamb has asked to include a definition of 'agricultural intensification' following consultation with the relevant agricultural sector representatives. | Support | We agree that it would be helpful to define 'agricultural intensification' in so far as it references the effect it has on the receiving environment. |
| | FPI043.022 OWRUG | SRMR-15 - Significant resource management issues for the region | OWRUG seeks to amend the statement at SRMR-15. | Support | This complements the position taken in our submission. |
| | FPI047.009 Horticulture New Zealand | SRMR15 – Significant resource management issues for the region | Horticulture New Zealand seeks to amend SRMR-15 to refer to population growth, <u>food production</u> and land-use intensification. | Support in part | We support the reference to food production but consider it should read: <u>Food and fibre</u> production will see increased demand for freshwater for human consumption, irrigation and other economic uses. |
| | FPI019.002 Fonterra | SRMR-16 | Fonterra has submitted a new 'significant resource management issue', focusing on the impact that | Support | We support the inclusion of this amended policy as it supports the position taken in our submission. |

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| | | | restricted resource use may have on the social and economic well-being of the region. | | |
| RMIA-WAI | | | | | |
| | FPI030.014 Kāi Tahu ki Otago | RMIA-WAI-I3 | | Neutral | We are interested in following how construction of barriers to fish passage, drainage, altered flow regimes, reduced water quality and removal or riparian vegetation all impact on access and use of resources. |
| LF-VM | | | | | |
| | FPI045.008 Forest and Bird | LF-VM - Visions and management | Propose a new overarching provision. | Strongly Oppose | This does not support our submission, and clearly has not followed the L&WP criteria of rohe specific provisions. |
| | FPI029.001 Otago Regional Council | LF-VM - Visions and management | Proposed time frames around the Catlins rohe visions, meeting them by 2030. It shows that regarding current modelling it is unlikely to reach periphyton targets. Mitigations could be identified through community consultations. | Support | This supports our proposal. |
| | FPI018.001 Waka Kotahi – NZ Transport Agency | LM-VM-O2 | Waka Kotahi seeks to amend wording to allow for modification in 'extreme circumstances'. As Otago is a has a very rural landscape and the Clutha River is one of New Zealand's fastest flowing rivers in New Zealand, which in cases of high/significant flow could result in the need for artificial/temporary changes to the environment for the health and safety of people. | Support | We find this to complement our submission and takes into consideration the health and safety/ remoteness of rural communities in Otago. |

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| | FPI043.002 OWRUG | LF-VM-04 | OWRUG seeks to amend LF-VM-04 to include clear goals that are subject to a cost-benefit analysis that demonstrates the requirements of cl 3.3 of the NPS FM2020. They seek to amend (8) Water is allocated to the food and fibre sector to support sustainable production and the sectors contribution to social and economic wellbeing of the community; and (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. | Support | The NPS-FM 2020 identifies that irrigation, cultivation and production of food and beverages must be considered and the proposed amendments by OWRUG better reflect the NPS-FM 2020. The utilisation of water storage (both on stem and off-stem) are crucial to improving resilience to the effects of climate change. |
| | FPI030.022 Kāi Tahu ki Otago | LF-VM-04 | Kāi tahu seeks an amendment to include (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. | Oppose | This proposal conflicts with our submission. |
| | FPI025.020 Beef + Lamb | LF-VM-04 | Beef + Lamb seek to clarify that restoration will only apply to wetlands that are degraded, and otherwise, maintenance or sustainment is appropriate. | Support | This compliments our submission. |
| | FPI018.002 Waka Kotahi- NZ Transport Agency | LF-VM-O5 – Dunedin & Coast FMU vision | Waka Kotahi seeks to have flexibility to be able to accommodate changes for the protection of state highways. | Support | This complements our submission. |
| | FPI035.010 Wise Response Society | LF-VM-P6 – Relationship between FMUs and Rohe | Wise Response Society proposed to amend; 'Where rohe have been defined within FMUs: (1) environmental outcomes must be | Oppose | This proposal conflicts with the position taken in our submission. It is important to develop specific |

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| | | | 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> | | environmental protections for each rohe 'locally'. A trend that may affect the coastline of Chile will not necessarily have the same affects within the rohe in Otago. This is too far reaching for a local territorial authority to consider. |
| LF-FW | | | | | |
| | FPI035.011 Wise Response Society | LF-FW – Fresh water Objectives LF-FW-O8 – Fresh water | The Wise Society seeks to amend to clarify and extend the objectives to other important processes. | Oppose | This proposal conflicts with the position taken in our submission. |
| | FPI018.005 Waka Kotahi – NZ Transport Agency | LF-FW P15 Stormwater and wastewater discharge | Waka Kotahi submitted on practical outcomes for wastewater discharge in the rural setting. It is important that practical solutions are taken that do not create further economic burden on ratepayers as a result of unnecessary regulatory approaches, where one is practically made available” | Support | This proposal supports the position taken in our submission. |
| | FPI025.034 Beef + Lamb | LF-FW - Freshwater LF-FW-PR3 | Beef + Lamb opposes the provisions of the Land and Freshwater because there is confusion about the proper relationship between values, environmental outcomes, target attribute states and limits. There is concern that the provisions are overly restrictive and inconsistent with good practice. Beef + Lamb also raises the concern that the chapter contains provisions which would ordinarily require analysis and data to support them, and which has not yet been done. | Support | This proposal compliments our submission. We urge the council to take up the recommendations proposed in this submission. |

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| | FPI021.002 Ballance Agri-Nutrients | LF-WAI-To Mana o te Wai LF-WAI-P1 | Ballance would like an amendment to refer to decision making affecting fresh water instead of management. | Support | This proposal compliments our submission. |
| | FPI017.011 Ravensdown Ltd. | LF-FW - Freshwater LF-FW-P15 | Ravensdown would like to see amendments to the removal of wastewater from the policy and see a measured mitigation approach taken. They have also taken a constructive approach with promoting source control which we strongly support. | Support | This compliments our submission. |
| | FPI047.024 Horticulture New Zealand | LF-FW - Freshwater LF-FW-P15 | Horticulture NZ has sought amendment for the following; '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'. | Support | This compliments our submission. We strongly urge the council to accept this. |
| | FPI030.033 Kāi Tahu ki Otago | LF-FW - Freshwater LF-FW-P15 | Kāi Tahu ki Otago seek the provision is split into wastewater and stormwater as well as amending the various thresholds. | Oppose in part | We seek that the wording in LF-FW-P15 is retained as to how it relates to wastewater but are neutral as to whether there should be a separate statement for stormwater. |
| LF-LS | | | | | |
| | FPI044.022 Director General of Conservation | LF-LS-P21 | Director General of Conservation has proposed the following; Amend as follows or words to like effect: "Achieve the improvement or maintenance of freshwater quantity, <u>or quality, and ecosystem values</u> to meet environmental outcomes set for | Strongly Oppose | This does not align with our submission and too broad approach. It is not an enabling policy and does not state that farmers would receive support for the inclusion of this policy in the plan. The inclusion of ecosystem values expands the policy further than was intended. This can |

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| | | | Freshwater Management | | be achieved through other non-regulatory methods. |
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