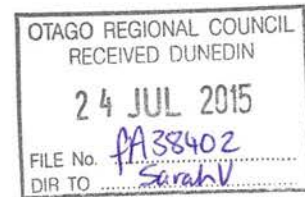


Otago Regional Council  
Private Bag 1954  
Dunedin 9054  
Email: rps@orc.govt.nz



24/07/2015

Dear Sir / Madam

**Re: Proposed Regional Policy Statement for Otago**

1. This is a submission from the Otago Fish and Game Council on the publicly notified version of the proposed Regional Policy Statement for Otago ("proposed RPS"), notified on 23 May 2015.
2. The Otago Fish and Game Council ("Fish and Game") is the statutory manager of sports fish and gamebird resources within Otago, under section 26Q of the Conservation Act 1987.
3. Fish and Game is not a person who could gain an advantage in trade competition through this submission, pursuant to clause 6 of Schedule 1 of the Resource Management Act 1991 ("the Act").

Summary

4. Fish and Game provides overall support for the proposed RPS. Unless specific relief is detailed, Fish and Game supports the proposed RPS provisions.
5. Fish and Game is particularly supportive of the following aspects of the proposed RPS:
  - a. The use of the word "avoid" in objectives and policies.
  - b. The continued recognition of the importance of Otago's freshwater values and rivers.
  - c. The recognition of the value of water yield characteristics of tussock grasslands and the threats to this value in dry catchments from conversion to pasture and forestry and requiring territorial local authorities to restrict and control land conversion and planting in order to protect this value in Objective 4.3, Policy 4.3.2 and Method 6.1.3.
  - d. Support, with minor amendment, for Schedule 3 – Significance threshold

- e. Support, with a minor amendment, for Schedule 4 – Criteria for the identification of natural features and landscapes.
6. Fish and Game submitted on the consultation draft of the proposed RPS. Fish and Game is concerned about the following changes that have occurred between the consultation draft, and the notified version of the proposed RPS.

*Structural issues*

- a. The “wiring diagram” which determines the structure of the RPS. This appears to reverse the usually understood RMA hierarchy of issues, objectives, policies, and methods in favour of a more outcome based approach. Fish and Game is not opposed to an outcome based approach, but the new structure may clash with the existing traditional structure inside regional and district plans and be difficult to understand or incorporate into these plans, especially as many of them are about to be notified for review. It is accepted that some of this former structure is now encapsulated in the subheadings that appear under each objective, such as water, air, soil, ecosystems and indigenous biodiversity, geomorphology and landscape, and natural character, but this structure and the way it interfaces with District Plans requires more explanation if the proposed RPS is to be given effect in an efficient manner.
- b. The lack of clear outcomes. The wiring diagram on page 12 references outcomes, but it is not clear where these are within the substance of the proposed RPS. If the outcome is the heading and narrative at the beginning of each chapter then this should be stated.
- c. The writing style for objectives. The objectives often read more as outcomes or issues rather than as traditionally understood objectives, which are usually written with a future infinitive “to”. The objectives are also followed by a paragraph/s of text, and it is not clear what status this text has. If this text is “narrative” referred to in the explanation on page 12, this should be explained, along with its status when reading the overall objective.
- d. The writing style for policies. This is a similar concern to the above, with the status of the sentence below the policy not being clear. There may be no need for the policy to have a title, especially where the titles differ from the sentences that follow them.
- e. Loose or unusual wording within objectives and policies that does not reflect standard RMA practice. Words such as “support”, “recognise”, and “manage/managing” are often used in the overall policies when the underlying clauses use more consistent and often stronger RMA language. Specific suggestions for improvement will be given as relief.
- f. Whilst some improvement has been made, there are still many inconsistencies around the use of words like “pest”, “predator”, and “indigenous”. It still appears as if these words have been inserted as generic qualifiers without thought to how the overall policy or objective will function with these qualifiers. Specific relief is sought where these issues occur and will be primarily shown in Fish and Game’s marked up version of the proposed RPS (refer Appendix 2).

*Specific issues*

- g. The lack of regard given to:
    - (i) the Otago Sports Fish and Gamebird Management Plan, prepared under the Conservation Act 1987, as required by s61(2)(a)(i) of the Act as being a management plan and strategy "prepared under other Acts": and
    - (ii) the s61(2)(a)(iii) requirement to consider regulations relating to ensuring the sustainability, conservation, and management of fisheries resources.
  - h. The removal of a list of the significant resource management issues for Otago. This is a requirement of Section 62(1)(a) of the Act.
  - i. The lack of rigour in the objectives, policies, and methods for the protection and maintenance of biological diversity, including in particular indigenous biodiversity, as required under section 62(1)(i)(iii) of the Act.
  - j. The requirement for consistency with water conservation orders, under section 62(3).
  - k. The need for methods on how interactions between vulnerable native fish and salmonids are managed by the agencies responsible for these species.
  - l. The removal of the statement in the energy section that recognised the finite nature of fossil fuels.
7. The proposed RPS in its current form does not adequately provide for / or give effect to:
- a. The purpose and principles of the Act, including but not limited to:
    - i. Safeguarding the life supporting capacity of... water, soil, and ecosystems (section 5(2)(b)), and
    - ii. the preservation of the natural character of .... wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development (section 6(a));
    - iii. the protection of outstanding natural features and landscape (section 6(b));
    - iv. the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna (section 6(c));
    - v. The maintenance and enhancement of public access to and along the coastal marine area, lakes, rivers, and wetlands (section 6(d)).
    - vi. maintenance and enhancement of amenity values;
    - vii. protection of the habitat of trout and salmon (section 7(h));and accordingly it does not appropriately recognise the importance of environmental protection as a core element of sustainable management

b. s30 of the Act including but not limited to:

- i) Establish and implement objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region (section 30(1)(a));
- ii) Establish and implement objectives, policies, and methods to control the use of land for the purpose of the maintenance and enhancement of the quality of water in water bodies and coastal water (section 30(1)(c)(ii));
- iii) Establish and implement objectives, policies, and methods to control the use of land for the purpose of the maintenance of the quantity of water in water bodies and coastal water (section 30(1)(c)(iii));
- iv) Establish and implement objectives, policies, and methods to control the use of land for the purpose of the maintenance and enhancement of ecosystems in water bodies and coastal water (section 30(1)(c)(iiia)); and
- v) Establish objectives, policies and methods for maintaining indigenous biological diversity (section 30(1)(ga)).

c. S32 of the Act.

d. s59 of the Act - achieve integrated management of the natural and physical resources of the Otago region .

e. s61 of the Act.

f. s 62 of the Act.

g. The NPS for Freshwater Management 2014.

h. The Water Conservation (Kawarau River ) Order 1997

i. Ensuring that resource use (including the taking of water and use of the assimilative capacity of water) is necessary, reasonable and efficient (section 7(b)).

j. The protection of recreational fisheries and gamebird resources, including the protection of rivers, lakes, wetlands, and their margins.

k. Maintenance and enhancement of the quality of freshwater environments, including wetland environments, as habitats for sports fish and game birds (section 7(f)).

l. The maintenance and enhancement of recreational values, amenity values, and the intrinsic values of ecosystems (section 7(c) and (d)).

m. Adequately identifying and listing the values of freshwater in the region including but not limited to: recreational salmonid fishery and spawning values.

n. Managing land use activities and development so that life supporting capacity of water is safeguarded; and freshwater values including trout fishery, trout spawning, recreational and amenity values; areas of significant indigenous vegetation and

significant habitats of indigenous fauna; and the natural character of waterbodies is protected.

- o. Good resource management practice.

#### *Section 32*

8. Fish and Game submit that the Council has not sufficiently evaluated the appropriateness of the objectives to achieve the purpose of the Act, nor the benefits and costs of the policies and methods to achieve the objectives. For instance, there is no evaluation of Schedule 3 (Significance threshold), Schedule 4 (criteria for the identification of natural features and landscapes) or Schedule 5 (criteria for the assessment of the significance of indigenous vegetation and habitat of indigenous fauna).
9. Fish and Game considers that the proposed RPS provisions could be improved to create an efficient and effective framework to address the significant natural resource management issues in Otago and the purpose of the Act and to achieve integrated management of natural resources.

#### *National Policy Statement on Freshwater Management 2014 (the NPS-FM)*

10. In regards to the NPS Freshwater, Fish and Game submit that the proposed RPS, in relation to managing water quality, could be amended to better give effect to the NPS Freshwater's Objectives and Policies including, but not limited to, for the following reasons:
  - a. Objective B2 of the NPS-FM requires the Otago Regional Council **to avoid any further over-allocation of freshwater and phase out existing over-allocation;**
  - b. Objective B3 of the NPS-FM requires the Otago Regional Council **to improve and maximise the efficient allocation and efficient use of water;**

#### General relief sought

11. Fish and Game has supplied a marked up version of the proposed RPS which shows the relief sought (refer Appendix 2).

#### *Structural issues with the RPS:*

12. Fish and Game seek clear labelling where "narratives" apply within objectives and policies to ensure that these paragraphs or sentence statements are differentiated from the actual objective and policy.
13. Fish and Game seek that outcomes are clearly identified at the beginning of the proposed RPS chapters.
14. Any similar relief with like effect which addresses Fish and Game's concerns.
15. Any other consequential amendments which arise from Fish and Game's submission or the relief sought.

Specific relief sought:

*Regard to Otago Sports Fish and Gamebird Management Plan*

16. Fish and Game ask that the changes it proposes to the proposed RPS be made to ensure that it is consistent with the Otago Sports Fish and Gamebird Management Plan.

*Regionally Significant Resource Management Issues:*

17. Fish and Game seeks the reinsertion of a chapter or section that lists regionally significant resource management issues. The consultation draft version (November 2014) contained such a list from page 9 to 10, which is reproduced below:

- a) Issue 1: Cumulative effects of human activities on natural resources.
- b) Issue 2: Managing complex interconnections between natural resources.
- c) Issue 3: Incorporating tangata whenua values in resource management decisions.
- d) Issue 4: Spreading of pest species.
- e) Issue 5: Vulnerability to natural hazards.
- f) Issue 6: Adapting to climate change.
- g) Issue 7: Responding to fuel and energy pressures.

18. Subsequent analysis and thinking by Fish and Game has identified that this list largely encapsulates the significant resource management issues for Otago that concern Fish and Game, with some additions to explicitly state the issues with the overallocation and degradation of freshwater resources, and the loss of biodiversity other than through the spread of pest species. The original list has largely been allocated out amongst the chapters in the proposed RPS, and Fish and Game seeks that this is reproduced in a consolidated form at the beginning of the RPS.

19. Fish and Game is supportive of other organisations and submitters that have submitted in support of the list of regionally significant resource management issues to be reinserted within the proposed RPS.

*Relief sought:*

20. Fish and Game seeks the following relief:

The reinsertion of a list of regionally significant resource management issues in Part A of the proposed RPS. This list is as follows, using the original list with the insertions suggested as:

- Issue 1: Cumulative effects of human activities on natural resources, **including the overallocation and degradation of freshwater resources.**
- Issue 2: Managing complex interconnections between natural resources.
- Issue 3: Incorporating tangata whenua values in resource management decisions.
- Issue 4: Spreading of pest species.
- Issue 4A **The loss of biodiversity, including indigenous biodiversity**
- Issue 4B: The loss and degradation of wetlands**
- Issue 5: Vulnerability to natural hazards.
- Issue 6: Adapting to climate change.
- Issue 7: Responding to fuel and energy **constraints.**

The reasons for the relief are as follows:

21. Issue 1: Water is the lifeblood of Otago, and the protection and management of our freshwater resources in Otago is of paramount concern to Fish and Game. The quantity and quality of water can be thought of as a “master variable” or master ecosystem service that has a profound or major effect on ecosystems and other resources, both upstream and downstream within a river or catchment, on species within that ecosystem or catchment and also on other resources. Changes in water cause changes elsewhere in the ecosystem.
22. Issue 2: raises the issue of the complex interconnections between natural resources – most of this connection occurs through freshwater, either as water itself flowing downstream, or species that live within or are transported by water interacting. The same is true in the economic sphere – as water is a critical input for towns and cities, agriculture, for tourism, and for recreation, which includes freshwater angling and hunting. Therefore, most of what is intended to be encapsulated by Issue 2 is more succinctly summed up by adding the issue of overallocation and degradation to Issue 1. Issue 2 can then capture the other more general interconnections.
23. Fish and Game accept that the issues identified in an RPS are high-level, but some of the current list of issues have a tendency to be so high-level as to be ineffectual. However, some of the issues identified are quite specific, such as the “spreading of pest species”, so there is a consistency issue.
24. The list of issues in the consultation version of the RPS was specific to the role of pests, but did not address the ongoing loss of biodiversity across Otago. Issue 4A is included to reference this. The loss of all biodiversity is a concern, rather than just indigenous biodiversity. Many introduced plants (that are not pests) provide valuable ecosystem services in buffering water from land, in pollination and providing for the habitat of bees, in erosion control and flood regulation, as well as being valued in their own right. Pesticides and hazardous substances damage all biodiversity for instance. We live in a modified landscape across much of Otago, and whilst indigenous species deserve higher protection and status where they are under threat and where protection is practical or possible, we cannot ignore the role played by introduced plants and some introduced animals and fish in Otago. There are places in the objectives and policies within the proposed RPS, and in underlying plans, where both introduced and indigenous biodiversity is recognised and referenced, and this needs to be consistent in the overall list of issues.
25. Otago is still continuing to lose wetlands, despite the introduction of plan change 2 (regionally significant wetlands). Smaller wetlands are still being incrementally drained and converted to pasture, especially as many of these (up to 1/3 of the former Schedule 10) have no protection. This is a significant resource management issue for Otago, hence relief is sought to add Issue 4B into the list of regionally significant issues.
26. Issue 7 is amended slightly to use the word “constraints”, as this word better reflects both the supply situation with fossil fuels, short term supply shocks, regulations and restrictions that may be placed on their use as a result of international climate treaties, and any demand issues that result from economic factors. It also reflects how the concept is worded elsewhere in the proposed RPS – “constraints” is used more often than “pressures”.
27. Fish and Game seek any similar relief with like effect which addresses our concerns.

28. Fish and Game seeks any other consequential amendments which arise from our submission or the relief sought, including additional objectives and policies that comprehensively address the issues.

*Protection and Maintenance of Biological Diversity*

29. In respect of the specific issue raised above at paragraph 6(i) Fish and Game has commented extensively on the issue of the wording around pests and predators and indigenous species previously in comments on the consultation draft. Many of Fish and Game's original concerns have been addressed. However, there are still inconsistencies, and the relief sought on these issues is in Appendix 1 and Appendix 2.
30. Fish and Game has concerns with Policy 4.5.5 unless a definition of pest is inserted into the proposed RPS. The policy as currently written does not define what a "pest" is. Fish and Game's relief in Appendix 1 and Appendix 2 addresses this.
31. Fish and Game seek any similar relief with like effect which addresses our concerns.
32. Fish and Game seeks any other consequential amendments which arise from our submission or the relief sought.

*Methods of managing interactions between agencies / finite nature of fossil fuels*

33. The other specific issues raised above at paragraph 6(k) and (l) are addressed where they occur by amended wording in the marked up version of the proposed RPS in Appendix 2.
34. Fish and Game seek any similar relief with like effect which addresses our concerns.
35. Fish and Game seeks any other consequential amendments which arise from our submission or the relief sought.
36. Fish and Game requests to be heard in support of this submission at any hearing convened to consider the proposed RPS.

Thank you for the opportunity to submit,

Yours sincerely,

Peter Wilson  
Environmental Officer  
Otago Fish and Game Council  
Dunedin

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Dunedin



Appendix 1 – Relief sought

Reference / page number proposed RPS / page number (marked up version)	Item	Support/Oppose	Relief sought	Reasons
Page 12(8), item 2	"2. Otago has high quality natural resources and ecosystems"	Support with amendments	<p>Amend text to the following (in red):</p> <p>Otago’s natural resources are valued for their intrinsic values, and whilst society relies heavily on the systems and services of the natural environment, the recognition, protection, and sustainable management of the intrinsic values of natural resources and their ecosystems is paramount.</p> <p>This chapter addresses our fundamental reliance on natural resources and ecosystem services to sustain us, our way of life, cultural identity and our economy. Agriculture and tourism, Otago’s biggest earners, both rely on having a great a high quality environment. The chapter deals with the resources that are most important to us, and the</p>	The amended text takes greater account of Part II matters including intrinsic values and the need for their protection and sustainable management.

			inherent qualities of the natural environment that give it value beyond human use.	
Page 12(8), item 3	"3 – communities in Otago are resilient, safe, and healthy"	Support with amendments	Amend text to correct spelling "constraints":  "This chapter deals with our response and ability to be resilient to resource limitations or <b>constraints</b> , shock events, system disruptions, natural hazards, and climate change."	
Page 12(9), item 9	"How to read the RPS" text.	Support with amendments	Amend text to the following:  "Under each policy there is reference to relevant methods. These methods and regional, city and district council roles and responsibilities and <b>responsibilities of other organisations</b> are detailed in Part C."	The addition of responsibilities of other organisations gives effect to the addition of Method 7.7 for fisheries management that is sought by the Otago Fish and Game Council.
Page 13(10)	Insert list of regionally significant resource management issues	Insert new text	<b>Regionally Significant Resource Management Issues</b>  (Note that the <b>blue</b> represents text that was in the consultation draft submission of November 2014, which is part of Fish and Game's relief sought, and the <b>red</b> text represents additional relief)	Section 62(1)(a) of the Resource Management Act 1991 requires that a regional policy statement must state the significant resource management issues for that region. Whilst this RPS does state those issues, the way in which they have been distributed out to the

			<p>Issue 1: Cumulative effects of human activities on natural resources, <b>including the overallocation and degradation of freshwater resources.</b></p> <p>Issue 2: Managing complex interconnections between natural resources.</p> <p>Issue 3: Incorporating tangata whenua values in resource management decisions.</p> <p>Issue 4: Spreading of pest species.</p> <p><b>Issue 4A The loss of biodiversity, including indigenous biodiversity</b></p> <p><b>Issue 4B: The loss and degradation of wetlands</b></p> <p>Issue 5: Vulnerability to natural hazards.</p> <p>Issue 6: Adapting to climate change.</p> <p>Issue 7: Responding to fuel and energy <b>constraints.</b></p>	<p>individual chapters makes it difficult for an overview to be obtained. Fish and Game requests that the list be reinserted with additions.</p> <p>Issue 1 has been redrafted to state the obvious major issue facing Otago – which is the overallocation and degradation of freshwater resources. This gives effect objective B2 of the National Policy Statement on Freshwater Management 2014.</p> <p>Issue 4A has been inserted to place a priority on the loss of biodiversity, including indigenous biodiversity.</p> <p>Issue 4B has been inserted to state that the ongoing loss and degradation of wetlands in Otago remains an issue.</p> <p>Issue 7 has had a spelling mistake fixed.</p>
Page 24(20)	Objective 2.1 text	Amend	Amend objective text to the following: The values <b>and life supporting</b>	This text better reflects section 5 of the Act, and recommends a course of

			capacity of Otago’s natural and physical resources are recognised, maintained and enhanced, or restored where they were degraded or lost	action where values are degraded or lost.
Page 24(20), Objective 2.1, Issue text	Issue text	Support with amendments	Amend text to the following:  “Degradation of the values and of natural systems risks loss of complexity, which in turn jeopardises the life sustaining supporting capacity of the environment, and the ecosystem services provided by this environment to the community.”	The current text is difficult to understand with the inclusion of the complexity concept. Environmental complexity isn’t always linked to environmental quality. It is simpler to say that degradation of natural systems jeopardises their life supporting – not sustaining – capacity, to better reflect the wording in section 5 of the Act. Fish and Game has also suggested that ecosystem services be restated to be “ecosystem services provided by this environment”
Page 24(20), Objective 2.1, Need text	Need text	Support with amendments	Add text to the following:  “It is a matter of national importance to recognise and provide for natural resources systems and processes.  We need to know enough about the many values and characteristics of Otago’s natural and physical resources,	The current text does not reflect the objective, as it appears to only refer to the need to “know enough” about Otago’s natural and physical resources in order to manage them, whereas the objective states the need to maintain and enhance those resources.

			and the ecosystem services they provide for us, to be able to manage the effects of human activities on the environment's life supporting capacity adequately."	<p>The twin objectives 2.1 and 2.2 also appear to split natural resources into two categories – all resources, and those that are "significant and highly valued".</p> <p>This is contrary to section 6(a) of the Act, which does not make this distinction for the coastal environment, wetlands, lakes, and rivers. Therefore, the addition of the description from Objective 2.2, Need, is necessary which states that these matters are of national importance.</p>
Page 24(20), Objective 2.2	Objective text	Support with amendments	<p>Amend objective to the following:</p> <p>Otago's significant and highly valued natural resources are identified, and protected or enhanced <b>to maintain their distinctiveness and significance</b></p>	This text states the reason for identifying, protecting, or enhancing significant or highly valued resources.
Page 24(20), Objective 2.3	Objective text	Support with amendments	<p>Amend objective to the following:</p> <p>Natural systems and interdependencies are recognised <del>and</del>, sustained <b>and restored.</b></p>	
Page 26(20), Policy	Policy text	Support with amendments	Amend policy to the following:	The word "support" is not

2.1.1			<p>Recognise freshwater values, and manage freshwater, to:</p> <p>a) <del>Support</del> <b>Maintain and enhance</b> healthy ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins <b>and restore unhealthy ecosystems;</b> and</p> <p>b) Retain the range and extent of habitats provided by freshwater; and</p> <p>c) Protect outstanding water bodies and wetlands; and</p> <p>d) Protect migratory patterns of freshwater species, <b>including the habitat of trout and salmon,</b> unless detrimental to indigenous biodiversity; and</p> <p>e) Avoid aquifer compaction, and seawater intrusion in aquifers; and</p> <p>f) Maintain good water quality, including in the coastal marine area, or enhance it where it has</p>	<p>clear on meaning, and it is better to use the more traditional and widely understood and applied terms of “maintain and enhance”</p> <p>Clause (d) is amended to reflect section 7(h) of the Act (“have particular regard to...the protection of the habitat of trout and salmon”) to be clear that the migratory patterns of freshwater species includes the habitat of valued introduced species such as trout and salmon.</p> <p>A new clause (f1) is inserted to better reflect the requirements of section CA of the National Policy Statement on Freshwater Management (2014) to phase out over-allocation. This also is consistent with Fish and Game's proposed reinsertion of the regionally significant resource management issues to the proposed RPS, in particular the amended Issue 1.</p> <p>A change to clause (i) is</p>
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			<p>been degraded; and</p> <p>(f1) Phase out the over-allocation of freshwater that has negative effects on water quality and instream flows by 2035; and</p> <p>g) Maintain or enhance coastal values supported by freshwater values; and</p> <p>h) Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and</p> <p>i) <del>Retain</del> Maintain or enhance the quality and reliability of existing drinking water supplies; and</p> <p>j) Protect Kāi Tahu values; and</p> <p>k) Provide for other cultural values; and</p> <p>l) Protect <del>important</del> recreation values; and</p> <p>m) Maintain the aesthetic and landscape values of rivers, lakes, and wetlands; and</p> <p>n) Avoid the adverse effects of pest species, prevent</p>	<p>proposed because for drinking water supplies, some of which suffer from poor or declining water quality, the retention of the quality of these supplies is not sufficient. It is better to “maintain or enhance” the quality of water in these supplies.</p> <p>Aligned with the changes proposed to Policy 2.1.1, an additional method, method 7.7 (Non-RMA) is sought to detail the statutory and non-statutory options available for managing fisheries by the agencies responsible for fish species, which is predominantly the Central South Island and Otago Fish and Game Councils and the Department of Conservation. This method also details in part the options available for managing the interactions between native and introduced species where threats exist, so has an inter-relationship with Fish and Game's proposal to re-introduce a list of regionally</p>
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			<p>their introduction and reduce their spread; and</p> <p>o) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</p> <p>p) Maintain the ability of existing infrastructure to operate within their design parameters.</p>	<p>significant resource management issues into the proposed RPS, in particular Issue 2.</p> <p>For clause I, Fish and Game submits that all recreation values associated with freshwater are recognised in the RPS. It is not clear how an importance test is to be used without criteria.</p>
Page 27(21), Policy 2.1.2	Policy text	Support with amendments	<p>Amend clause (d):</p> <p>"(d) Maintain ecosystem health and indigenous biodiversity and where it has been degraded restore or enhance it; and "</p> <p>Amend policy text to add the following clauses (m) and (n):</p> <p>(m) Maintain or enhance riparian vegetation</p> <p>(n) Ensure recreational access</p>	<p>An amendment to clause (d) is sought to provide for degraded ecosystems and indigenous biodiversity to be restored or enhanced.</p> <p>The current policy appears to ignore the positive and beneficial effects of riparian vegetation next to lakes, rivers, and streams.</p> <p>An addition is required to protect access for recreational users.</p>
Part B, Chapter 2, Page 28(22), Policy 2.1.3	Policy text	Support with amendments	<p>Amend policy text to add the following clause:</p> <p>Recognise coastal water values,</p>	<p>The word "support" is not clear on meaning, and it is better to use the more</p>



			<p>and manage coastal water, to:</p> <ul style="list-style-type: none"> <li>a) <del>Support</del> <b>Maintain or enhance</b> healthy coastal ecosystems; and</li> <li>b) Retain the range of habitats provided by the coastal marine area; and</li> <li>c) Protect migratory patterns of coastal water species, <b>including the habitats of trout and salmon</b>, unless detrimental to indigenous biodiversity; and</li> <li>d) Maintain coastal water quality, or enhance it where it has been degraded; and</li> <li>e) Maintain or enhance coastal values; and</li> <li>f) Protect Kāi Tahu values; and</li> <li>g) Provide for other cultural values; and</li> <li>h) Protect <del>important</del> recreation values; and</li> <li>i) Avoid the adverse effects of pest species, prevent their introduction and</li> </ul>	<p>traditional and widely understood and applied terms of “maintain and enhance”</p> <p>Clause (d) is amended to reflect section 7(h) of the Act (“have particular regard to...the protection of the habitat of trout and salmon”) to be clear that the migratory patterns of freshwater species includes the habitat of valued introduced species such as trout and salmon.</p> <p>For clause h, Fish and Game submits that all recreation values associated with coastal water are recognised in the RPS. It is not clear how an importance test is to be used without criteria.</p>
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			reduce their spread.	
Part B, Chapter 2, page 29(23), Policy 2.1.5	Policy text	Support with amendments	<p>Amend policy text to add the following clause (m)</p> <p>l) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; <b>and</b></p> <p><b>m) Avoid human or animal-induced sediment runoff</b></p>	<p>The list of policy items to manage the values of soils does not include any mention of preventable erosion. Given that the Regional Water Plan sets a prohibited activity status for land to be managed in such a way as to prevent the loss of soil to water (without a buffer) it is desirable to also provide for this in the RPS. The King Salmon case (EDS vs King Salmon) has stated that the use of prescriptive words such as “avoid” are appropriate where prohibited activity status is already in place. This gives effect to Rule 12.C.0.3 of the Regional Plan: Water which introduces a prohibited activity status for sediment runoff where no containment or buffering has been undertaken. This justifies a similar policy in the RPS, or the RPS places the currently more stringent RPW Rule under threat.</p>

<p>Part B, Chapter 2, page 30(23), Policy 2.1.6</p>	<p>Policy text</p>	<p>Support with amendments</p>	<p>Amend title of policy to:</p> <p>Managing for ecosystem and <del>indigenous</del> biodiversity values</p> <p>Amend introductory words to:</p> <p>Recognising the values of ecosystems and <del>indigenous</del> biodiversity, and manage <del>adverse and cumulative effects on</del> ecosystems and <del>indigenous</del> biodiversity to:</p> <p>Amend clause (d) to the following:</p> <p>(d) Protect <del>important</del> hydrological services, including the services provided by tussock grassland; and</p> <p>Amend policy text clause (f) to the following:</p> <p>(f) Maintain habitats of <del>species, including</del> indigenous species that are important for recreational, commercial, cultural or customary purposes; and</p>	<p>To stop degradation or loss of ecosystems and indigenous biodiversity it is necessary to manage adverse and cumulative effects, not the systems themselves.</p> <p>The current policy appears to recognise and/or assume that only indigenous species are important for recreational, commercial, cultural or customary purposes. This ignores both the reality – most recreational fisheries in Otago are based on trout and salmon – and section 7(h) of the Act.</p>
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<p>Page 37(31), Policy 2.2.12</p>	<p>Policy text</p>	<p>Support with amendments</p>	<p>Policy 2.2.12 Identifying outstanding water bodies and wetlands</p> <p>Identify outstanding water bodies and wetlands and their amenity or intrinsic values, using the following criteria:</p> <ul style="list-style-type: none"> <li>a) A high degree of naturalness;</li> <li>b) Outstanding aesthetic or landscape values;</li> <li>b1) Outstanding amenity or intrinsic values which are afforded by waters in their natural state;</li> <li>b2) Where waters are no longer in their natural state, the amenity or intrinsic values of those waters which in themselves warrant protection because they are considered outstanding;</li> <li>b3) Outstanding habitat for</li> </ul>	<p>An RPS is required to give effect to the Act, and water conservation orders. Fish and Game considers that the current Policy 2.1.12 is deficient by not recognising all aspects and values of outstanding water bodies that are listed in Part 9 of the Act in order for the identification process to begin.</p> <p>A statement is introduced to be clear on the assessment criteria to meet the outstanding definition. This states that meeting one of the criteria is sufficient for the water body to be defined as outstanding.</p>
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			<p>terrestrial or aquatic organisms.</p> <p>b4) Outstanding fishery values.</p> <p>b5) Outstanding for its wild, scenic, or other natural characteristics</p> <p>b6) Outstanding scientific or ecological values</p> <p>b7) Outstanding recreational, historical, spiritual, or cultural values and;</p> <p>c) Significant takata whenua cultural values;</p> <p>d) Significant recreational values;</p> <p>e) Significant ecological values;</p> <p>f) Significant hydrological values.</p> <p>Meeting one of the above criteria is sufficient to result in a water body being identified as outstanding under Policy 2.2.12 and therefore needing</p>	
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			protection under Policy 2.2.13	
Page 37(32), Policy 2.2.13	Policy text	Support with amendments	<p>Policy 2.2.13 Managing outstanding water bodies and wetlands</p> <p>Protect the values of outstanding water bodies and wetlands by:</p> <ul style="list-style-type: none"> <li>a) Avoiding significant adverse effects, including cumulative effects, on those values which contribute to the water body or wetland being outstanding;</li> <li>b) Avoiding, remedying or mitigating other adverse effects, including cumulative effects, on the water body or wetland's values; and</li> <li>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</li> <li>d) Controlling the adverse effects of pest species, preventing their</li> </ul>	An RPS is required to give effect to the Act, and water conservation orders. Fish and Game considers that the current Policy 2.1.13 is deficient by not recognising all aspects and values of outstanding water bodies that are listed in Part 9 of the Act.

			<p>introduction and reducing their spread; and</p> <p>e) <del>Encouraging</del> Ensuring enhancement of outstanding water bodies and wetlands.</p>	
Page, 32, Policy 2.2.14	Policy text	Support	Clarify how significance will be determined and how criteria will be balanced / weighed.	<p>Support</p> <p>(b) Significance for providing pollutant buffering or filtering services</p> <p>(c) Significance for providing water storage or flow retention services</p> <p>But clarify how 'significance' will be determined and how criteria will be balanced / weighed.</p>
Page 39(34), Objective 2.3	Objective text	Support	No amendments required	Fish and Game supports this objective.
Page 40(35), Policy 2.3.3	Policy text		<p>Amend to ensure that freshwater objectives, if assigned, are catchment-based to reflect existing practice, as follows:</p> <p>Apply an integrated management approach to activities in freshwater catchments, by:</p>	There is a risk that freshwater objectives, or freshwater management units (as defined in the National Policy Statement on Freshwater Management 2014) are defined in such a way as to allow for degradation in a lower catchment to be masked by higher water

			a) Using consistent <b>catchment-based</b> freshwater objectives for interconnected water bodies; and	quality in the upper reaches, or that multiple water-bodies are aggregated into one overall unit.  The current approach used by the Otago Regional Council is to be specific about individual catchments and sub-catchments based on their land-form and hydrology, and this should continue.
Page 47(40) Objective 3.1 and associated policies	Objective text and associated policies text	Support	No amendments required	Fish and Game supports this objective.
Page Objective 3.1 Part B, Chapter 3, Page 47, Objective 3.1	Need text	Support with amendments	Amend text to add a linkage to the underlying environmental reality:  "As a community, we are highly dependent on the resources available to us. When undertaking activities it is therefore important to consider the environmental context we operate within and develop accordingly <b>based on that underlying environmental reality</b> . For example, there should be sufficient water supply available for a proposed activity."	The additional text strengthens the overall intent of the objective narrative to restate the need for activities to operate within an appropriate context and carrying capacity.
Page 48(41)	Objective text and associated	Support	No amendments required	Fish and Game supports this



Objective 3.2 and associated policies	policies text			objective.
Page 54(46) Objective 3.3 and associated policies	Objective text and associated policies text	Support	No amendments required	Fish and Game supports the Otago Regional Council on determining the likely future effects and consequences of climate change.
Page 56(48) Objective 3.4 and associated policies	Objective text and associated policies text	Support	No amendments required	Fish and Game supports the Otago Regional Council on determining the likely future effects and consequences of climate change.
Page 57(49), Policy 3.4.2	Policy text	Support with amendments	Amend text as follows:  Manage infrastructure activities, to:  a) Maintain or enhance the health and safety of the community; and  b) <del>Reduce</del> <b>Avoid, remedy, or mitigate</b> adverse effects of those activities, including cumulative adverse effects on natural and physical resources <b>and the environment;</b> and  c) Support economic, social and community activities; and	The current policy could be strengthened to avoid, remedy, or mitigate adverse effects on the environment, defined here as natural and physical resources with an insertion to make it clear that natural and physical resources also includes the environment.

			<ul style="list-style-type: none"> <li>d) Improve efficiency of use of natural resources; and</li> <li>e) Protect infrastructure corridors for infrastructure needs, now and for the future; and</li> <li>f) Increase the ability of communities to respond and adapt to emergencies, and disruptive or natural hazard events; and</li> <li>g) Protect the functioning of lifeline utilities and essential or emergency services.</li> </ul>	
Page 60(52), Policy 3.5.2	Policy text	Support with amendments	<p>Amend text to the following:</p> <p>Policy 3.5.2</p> <p>Managing adverse effects of infrastructure that has national or regional significance</p> <p>Minimise adverse effects from infrastructure that has national or regional significance, by:</p> <ul style="list-style-type: none"> <li>a) Giving preference to</li> </ul>	As currently written, this policy does not provide for any offsetting or compensatory measures on anything other than indigenous biodiversity, and an amendment has been proposed to rectify this.

			<p>avoiding their location in:</p> <ul style="list-style-type: none"> <li>i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and</li> <li>ii. Outstanding natural features, landscapes and seascapes; and</li> <li>iii. Areas of outstanding natural character; and</li> <li>iv. Outstanding water bodies or wetlands; and</li> </ul> <p>b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</p> <p>c) Avoiding, remedying or mitigating other adverse effects on values; and</p>	
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			<p>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>e) Considering the use of offsetting, or other compensatory measures, for residual adverse effects on biodiversity, including indigenous biodiversity.</p>	
Part B, Chapter 3, page 45(38), Objective 3.6, Need	Need text	Support with amendments	<p>Amend text as follows:</p> <p><b>We need to recognise the finite nature of fossil fuels, and</b>  <del>We need to reduce our dependency on fossil fuels, and</del>  improve our energy resilience.</p>	<p>The consultation draft of the RPS issued in November 2014 stated clearly the finite nature of fossil fuels to define a major future environmental and energy problem. This has been removed from the notified RPS, and it is requested that it is reinserted as part of the objective. Stating it is important to provide focus for the challenging task ahead to leave fossil fuels before they leave us.</p>
Page 61(53), Objective 3.6	Narrative text	Support with amendments	<p>Amend the text to the following:</p> <p>In particular, Otago's reliance</p>	<p>The current text does not make sense as fossil fuels are a very efficient energy source, with a high net energy</p>

			on fossil-based transport fuels could be reduced in the medium to long term through <del>more efficient or</del> alternative transport fuels and system redesign.	(energy return on energy invested). That is why they are preferred to their renewable equivalents. It is better to simply refer to alternative transport fuels (that will most likely be less efficient in technical sense) and the system redesign necessary to cope with new fuels and energy sources.
Page 63(55), Policy 3.6.6	Policy text	Support with amendments	Amend the headline policy to:  Recognise the finite nature of fossil fuels and reduce <del>long term</del> demand for fossil fuels	The consultation draft of the RPS issued in November 2014 stated clearly the finite nature of fossil fuels to define a major future environmental and energy problem. This has been removed from the notified RPS, and it is requested that it is reinserted as part of the objective. Stating it is important to provide focus for the challenging task ahead to leave fossil fuels before they leave us.
Policy 3.6.6		Support with amendments	Amend the opening policy text to the following:  Reduce <del>the long term</del> demand for fossil fuels from Otago's communities, by:	The use of the phrase "long-term" may encourage deferring addressing the problem, when action is required on this issue currently. It is better to simply

				state the need to reduce demand for fossil fuels.
Part B, Chapter 3, page 67(59), Policy 3.8.1	Policy text	Support with amendments	Amend clause (c)(ii) as follows:  Maintain or enhance significant biodiversity, landscape, <del>or</del> natural character values, and public access to the coastal marine area, lakes and rivers; and	This is necessary to give effect to section 6(d) of the Act, a matter of national importance, the provision, maintenance and enhancement of public access to these areas. Fish and Game's statutory role under section 26Q(1)(b)(i) of the Conservation Act 1987 is to maintain and improve the sports fish and game resource by <i>maintaining and improving access</i> .
Part B, Chapter 3, page 69(60), Policy 3.8.3	Policy text		Amend clause (b)(iii) to include other reverse sensitivity effects:  (b)(iii) reverse sensitivity effects on rural productive activities, and other activities located in the area, can be avoided; and	Other activities, such as traditional rural recreational activities like angling and waterfowl hunting can be affected by reverse sensitivity as well.
Page 76(66), Objective 4.1	Need text	Support with amendments	Amend to:  Access to the natural environment and areas of cultural and historic significance is highly valued by residents and	The current wording implies that access restrictions might become more common, and Fish and Game's wording explains where access restrictions are traditionally

			visitors.  We need to use the opportunities subdivision and development create, to improve access to Otago's natural environment, or, in rare circumstances, such as around ports, to limit access to more sensitive places.	used.
Page 78(68), Objective 4.1 and associated policies	Objective text and associated policies	Support	No changes required	Fish and Game supports the recognition of public access at an objective level.
Part B, Chapter 4, page 83(72), Policy 4.3.1	Policy text	Support with amendments	Amend as follows:  Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling sustainable farming and other rural activities that support the rural economy; and b) <del>Minimising</del> Avoid, remedy, or mitigate the loss of soils highly valued for their versatility for primary production; and c) Restricting the establishment of activities in rural areas that may lead to reverse	Change to (a) references back to section 5 and the purpose of the Act.  The term "minimising" is not consistent with the Act. Avoid, remedy, or mitigate is suggested as a better term in clause (b).

			<p>sensitivity effects; and</p> <p>d) Minimising the subdivision of productive rural land into smaller lots that may result in rural residential activities; and</p> <p>e) Providing for other activities that have a functional need to locate in rural areas, including tourism and recreational activities that are of a nature and scale compatible with rural activities.</p>	
Page 83(72), Policy 4.3.2,	Policy text	Support with amendments	<p>Amend as follows:</p> <p>Manage land use change in dry catchments, to avoid <del>any significant</del> reduction in water yield, by:</p> <p>a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield, including</p>	<p>This policy, introduces a significance test for reduction of water yield. It is not clear in this RPS how significance is to be defined. A significance test has already been introduced into the policy by defining “dry catchments”.</p> <p>One of the features of conversion of tussock grasslands to pasture or forestry is the cumulative loss of water yield values. The nature of loss of water yield values does not lend itself to</p>



			<p>cumulative reductions; and</p> <p>b) <del>Minimising</del> <b>Avoid, remedy, or mitigate</b> the conversion of tussock grasslands to species which are less able to capture and hold precipitation.</p>	<p>significance tests.</p> <p>The term minimising has been replaced with avoid, remedy, or mitigate.</p>
Part B, Chapter 4, page 77, Objective 4.5, Issue	Issue text		<p>Amend to include the word ecosystem:</p> <p>“Otago’s <b>ecosystems</b> and significant areas of biodiversity and outstanding landscapes, for example, are under pressure from the direct effects of human activities, as well as indirect effects, including the spread of multiple pest species.”</p>	<p>The current text only refers to components of the environment ( biodiversity and outstanding landscapes), rather than the overall ecosystem.</p>
Part B, Chapter 4, page 77, Objective 4.5, Need	Need text		<p>Amend to include the word ecosystem:</p> <p>It is important to avoid effects that, individually or cumulatively, degrade Otago's natural <b>ecosystems</b> and built environment, where possible.</p>	<p>The current text only refers to components of the environment ( biodiversity and outstanding landscapes), rather than the overall ecosystem.</p>
Page 85(75), Objective 4.4	Objective text	Support	Support as written	Fish and Game supports this objective.

Page 85, Policy 4.4.1	Policy text	Support	<p>Support as written:</p> <p>Policy 4.4.1 Ensuring efficient water allocation and use</p> <p>Ensure an efficient allocation and use of water by:</p> <ul style="list-style-type: none"> <li>a) Requiring that the volume of water allocated does not exceed what is necessary for the purpose of use; and</li> <li>b) Requiring the development or upgrade of infrastructure that increases use efficiency; and</li> <li>c) Encouraging collective coordination and rationing of take and use of water when river flows or aquifer levels are lowering, to avoid breaching any minimum flow or aquifer level restriction; and</li> <li>d) Enabling water harvesting and storage, to reduce</li> </ul>	Fish and Game supports this policy.
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			pressure on water bodies during periods of low flows.	
Part B, Chapter 4, page 86(76), Policy 4.4.3	Policy text		<p>Amend as follows:</p> <p>Encourage activities which contribute to enhancing the natural environment, including to: Improve water quality; or</p> <p>e) Protect or restore habitat <del>for indigenous species,</del> including riparian habitats; or</p> <p>f) Regenerate indigenous species; or</p> <p>g) Mitigate natural hazards; or</p> <p>h) Restore <del>the natural character of</del> wetlands; or</p> <p>i) Improve the health and resilience of:</p> <p>i. Ecosystems supporting indigenous biodiversity; or</p> <p>ii. Important ecosystem services, including pollination; or</p> <p>j) Improve access to rivers, lakes, wetlands and their</p>	<p>The current policy ignores the predominately introduced or exotic vegetation on riparian margins, and the reality of reinstating vegetation in denuded environments is such that introduced species are far more likely to be used.</p> <p>When environmental restoration takes place it is often to restore wetland habitat for introduced species such as gamebirds, and contains a range of introduced and indigenous plants, which traditionally are not seen as pests.</p> <p>It is unclear what the difference is between restoring the natural character of wetlands and restoring wetlands in general, as wetland values are far more than just natural character.</p>

			<p>margins; or</p> <p>k) Buffer or link ecosystems, habitats and areas of significance that contribute to ecological corridors; or</p> <p>l) Control pest species.</p>	
Page 87(77), Objective 4.5	Objective text	Support	No changes required	Fish and Game supports this objective
Page 89(79), Policy 4.5.4	Policy text	Support with amendments	<p>Amend text in 4.5.4 to:</p> <p>Minimise soil erosion resulting from activities, by:</p> <p>a) Using appropriate erosion controls; and</p> <p>b) Maintaining vegetative cover on erosion prone land; and</p> <p>c) Remediating land where significant soil erosion has occurred; and</p> <p>d) Encouraging activities that enhance soil retention; and</p> <p>e) Buffering land from water</p>	These amendments better reflect the changes sought by Fish and Game to Policy 2.1.5 as well which is to avoid human or animal induced sediment runoff.
Page 90(80) Policy 4.5.7	Policy text	Support with amendments	<p>Amend as follows:</p> <p>Policy 4.5.7 Enabling offsetting of biodiversity, including indigenous</p>	Development activities in Otago can cause damage or loss to biodiversity in general, rather than just indigenous biodiversity, although in order

			<p>biodiversity</p> <p>Enable offsetting of adverse effects on <b>biodiversity, including</b> indigenous biodiversity values, only when:</p> <ul style="list-style-type: none"> <li>a) The activities causing those effects have a functional necessity to locate in significant or outstanding areas; and</li> <li>b) Those effects cannot be avoided, remedied or mitigated; and</li> <li>c) Those effects do not result in the loss of irreplaceable or vulnerable biodiversity.</li> </ul>	<p>to give effect to section 6(c) of the Act, indigenous biodiversity requires a priority. An example in point are activities on the bed of a lake or river, or activities that might reduce the flow in a river. These threaten a wide range of values beyond indigenous, and mitigation and offsetting is often (but not always) an option. The current policy would preclude this.</p> <p>It is also noted that clause (c) seems to refer to all biodiversity, rather than just indigenous biodiversity, so it is not clear what the policy-drafters intended.</p>
Page 90(80) Policy 4.5.8	Policy text		<p><b>Policy 4.5.8 Offsetting for biodiversity, including indigenous biodiversity</b></p> <p>Provide for offsetting for <b>biodiversity, including</b> indigenous biodiversity, when it is enabled, by ensuring that:</p> <ul style="list-style-type: none"> <li>a) The offset achieves no net loss and preferably a net gain in <del>indigenous</del> biodiversity values; and</li> </ul>	<p>Offsetting includes all values that might have been removed, damaged, or degraded from activities elsewhere and which are capable of restoration.</p>

Method 2.2	Method text	Support with amendment	Add  2.2.6 Establish protocols and processes for improving consistency with how affected parties are determined on resource consent applications	The process and protocols for councils to consistently determine who are affected parties on resource consent applications is a matter that the proposed RPS should address.
Page 95(85), Part C: Implementation, Method 3: Regional Plans	Method 3	Support		Fish and Game supports this method
Method 3.1.4	Method text under 3.1.4	Support with amendments	Amend text in 3.1.4 to add the following:  1.1.1 Regional Plans will set objectives, policies and methods to implement policies 2.1.1 – 6, 2.2.4, 3.9.4, 4.2.3, and 4.5.1, by including provisions to:  a. Manage land uses and vegetation removal within the beds of lakes and rivers and the coastal environment;  b. Manage change in river morphology;  c. Encourage restoration	The current method, whilst supported, lacks recognition of the primary resource management issue facing Otago – that of overallocation of water quantity, which is addressed through the setting of minimum and residual flows and allocation regimes for surface and groundwater. This is reflected in the amendments sought to the RPS by Fish and Game that place overallocation into the list of regionally significant resource management issues and the insertion of overallocation into Policy 2.1.1 that this method gives effect to.

			<p>of water margins;  <b>c1. Set minimum and residual flows and allocation regimes for water quantity, including default flows and allocation regimes, on all rivers in Otago.</b></p> <p>Consider carrying the concept in clause (c) through into objectives and policies.</p>	<p>The ORC currently has a programme of minimum flow setting for the remaining rivers and aquifers in Otago, and this addition to the method reflects that.</p> <p>In respect of (c) this encourages restoration of both indigenous and appropriate introduced species. It contrasts with many other clauses in objectives and policies that refer to indigenous species only. As objectives, policies are narrower this concept should be carried through into, and given effect in, objectives and policies.</p>
Page 96(86), Method 4, Part C, Implementation, Method 4: City and District Plans	Method text	Support		Fish and Game supports this method as written.
Page 96(86), Method 4.1.3  Part C, Implementation, Method 4: City and	Method text		<p>Amend:</p> <p>City or district plans will implement Policy 4.5.1 by including provisions to <b>control</b> the discharge of dust associated</p>	<p>This change is to ensure consistency with section 30(1)(b) and 30(1)(c) which requires territorial local authorities to “control” land use to give effect to these</p>

District Plans, Method 4.1.3			with earthworks and land use	objectives. Control is a more specific term than manage.
Method 4.1.4  Part C, Implementation, Method 4: City and District Plans, page 96(86), Method 4.1.4	Method text		Amend:  City or district plans will implement Policy 4.3.2 by including provisions <del>managing</del> <b>controlling</b> land use in dry catchments where this will impact on water yield	This change is to ensure consistency with section 30(1)(b) and 30(1)(c) which requires territorial local authorities to “control” land use to give effect to these objectives. Control is a more specific term than manage.
Page 99(91), Method 6	Method text	Support		Fish and Game generally supports this method.
Page 99(91), Method 6.1.2  Part C, Implementation, Method 6: Research, Monitoring and Reporting, page 99(91), Method 6.1.2	Method text		Amend:  Regional, city and district councils, in their areas of responsibility, will identify:  a. Significant indigenous vegetation and significant habitat of indigenous fauna; b. Areas of outstanding natural character in the coastal environment; c. Outstanding natural features, and outstanding natural landscapes and seascapes; d. Special amenity landscapes; e. Outstanding water bodies; f. The values of water	This list of values is less comprehensive than the list of values within the Regional Plan: Water. It appears to exclude values that are not identified as outstanding, important, or significant. This is a particular problem for freshwater, as Schedule 1 of that Plan already identifies a wide range of values present in waterways. Clause (g) is introduced to rectify this and avoid a scenario where Schedule 1 of the Water Plan could be amended to become less comprehensive.



			<p>margins critical to threatened or rare indigenous flora and fauna;</p> <p>g. The values of all water bodies and the ecosystems and habitats that they support.</p>	
<p>Method 6.1.3 Part C, Implementation, Method 6: Research, Monitoring and Reporting, page 99(91), Method 6.1.3</p>	Method text	Support		Fish and Game strongly supports this method.
<p>Method 6.2.2 Part C, Implementation, Method 6: Research, Monitoring and Reporting, page 100(89), Method 6.2.2</p>	Method text	Support		Fish and Game strongly supports this method.
<p>Page 102(90), Method 7</p>	Method text	Support		Fish and Game generally supports this method.
<p>Part C,</p>	Method text	Support		Provided a definition of pest

Implementation, Method 7, Strategies and Plans (non-RMA), page 102(90), Method 7.4 and 7.5				is inserted into this RPS using the definition provided in the Biosecurity Act 1993, Fish and Game is supportive of this objective.
Page 102 (90), Method 7.6.1	Method text	Support		
Page 102 (90), Method 7.7	Method text	New method	<p>Fish and Game proposes a new method 7.7 to address fisheries management. The method text is as follows:</p> <p><b>7.7 Fisheries management</b></p> <p><b>7.7.1 The regional council will:</b></p> <p>a. Encourage cooperation and liaison between agencies responsible for fisheries management, these being the relevant Fish and Game Council, the Department of Conservation and iwi groups.</p> <p>b. Encourage cooperation and liaison between the agencies and landowners to ensure that the interactions between native and introduced fish is appropriate managed to</p>	<p>The management of fisheries is separated between three main agencies in Otago – the Otago and Central South Island Fish and Game Councils which have responsibility for introduced trout and salmon, the Department of Conservation, with responsibility for native fish, and the Otago Regional Council, which is the primary manager and regulator for fish habitat. The protection of native fish requires an active and innovative approach from all three agencies working together, and this method is designed to encourage that.</p>

			ensure sufficient protection is provided to vulnerable native fish.	
Page 103 (91), Method 8	Method text	Support		Fish and Game generally supports this method.
Page 103 (91), Method 8.1.2	Method text	Support		8.1.2(c)(ii) is an example of effective wording to promote the benefits of both introduced and indigenous vegetation, especially for riparian vegetation to buffer land from water, and to improve freshwater fish habitat.
Page 104 (92), Method 9	Method text		Support	Fish and Game generally supports this method
Page 104 (92), Method 10	Method text		Support	Fish and Game generally supports this method
Method 11.2.1	Method text		Amend  b. Facilitate the restoration or enhancement of riparian margins, particularly when they:  i. Improve the health and resilience of ecosystems supporting indigenous biodiversity;  ii. Restore or rehabilitate ecosystems and indigenous biodiversity and natural	The notified version is inconsistent with the need to maintain and enhance all ecosystems and freshwater habitats.

			<p>character;</p> <p>iii. Contribute to a safe network of active transport infrastructure;</p> <p>iv. Improve access to rivers, lakes, wetlands and their margins;</p> <p>v. Mitigate risks of erosion;</p> <p>c. Facilitate initiatives that support:</p> <p>i. The conservation of indigenous vegetation;</p> <p>ii. Conservation of biodiversity values;</p> <p>iii. Maintenance or enhancement of coastal values, including restoration or rehabilitation of the natural character;</p> <p>iv. The protection or restoration of the significant values of wetlands;</p>	
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<p>Page 104 (92), Method 11.2.2</p>	<p>Method text</p>		<p>Amend</p> <ul style="list-style-type: none"> <li>a. Facilitate the restoration, rehabilitation or creation of freshwater and coastal habitats, particularly when it: <ul style="list-style-type: none"> <li>i. Encourages the natural regeneration of <b>habitats, including habitats for</b> indigenous species;</li> <li>ii. Buffers or links ecosystems, habitats and areas of significance that contribute to ecological corridors;</li> <li>iii. Maintains or enhances the provision of <b>indigenous</b> ecosystem services;</li> </ul> </li> </ul>	<p>The notified version is inconsistent with the need to maintain and enhance all freshwater habitats, including riparian planting.</p>
<p>Page 108 (97), Anticipated Environmental Result (AER) 2.1</p> <p>How indicators can be measured</p>	<p>Indicator</p>		<p>Amend: “There are public inventory/maps of <del>all</del> <del>outstanding</del> and <del>highly</del> <del>significant</del> natural and physical resources in Otago”</p>	<p>This is less than what is provided in Schedule 1 of the Regional Plan: Water currently. The inventory/maps should not be limited to just 'outstanding and highly significant' natural and physical resources. Nor should there be any provision that would enable Schedule 1 of the subordinate regional plan to become narrower in scope.</p>

Page 108 (97), Anticipated Environmental Result (AER) 2.2  How indicators can be measured	Indicator		Amend:  The number, extent, and health of Otago's wetlands is monitored and reported through a public inventory of Otago's wetlands exists and is maintained and updated	The current version does not anticipate any monitoring of wetlands, just that a wetland inventory will exist and be updated. It does not specify what information would go in that inventory, nor if it extends beyond regionally significant wetlands. Fish and Game seeks that monitoring and reporting be a required AER and measure. Fish and Game considers there should be scope for all wetlands to be contained in the public inventory, not just regionally significant wetlands.
Page 110 (99), Anticipated Environmental Result (AER) 2.4	Indicator		Amend:  There is a public inventory of Otago's highly-valued soils at a scale that can inform consent decision-making	This anticipates less information provision than that which is already provided by growOtago. Therefore the words "highly valued" should be removed.
AER 2.5	Indicator	Support with amendment	Amend  The cover area, connectivity, and health of ecosystems, indigenous vegetation and fauna in Otago is maintained or enhanced	Need to provide for all ecosystems.
Page 114 (103), Anticipated	Indicator	Oppose	Fish and Game wishes to remove the word "net" from	This method applies to outstanding and highly-valued

Environmental Result (AER) 3.4, How indicators can be measured			<p>this proposed indicator:</p> <p>There is no net loss to the values of Otago’s outstanding, significant, or highly valued natural and physical resources resulting from nationally and regionally significant infrastructure</p>	<p>resources, but yet implies that the effects of nationally or regionally significant infrastructure can be avoided or mitigated, presumably with an indicator test of no net loss.</p> <p>As these environments are outstanding and highly valued, mitigation is often not an option, and so Fish and Game proposes the removal of the “net loss” test from the indicator.</p>
Page 117 (105), Anticipated Environmental Result, AER 4.1, How indicators can be measured	Indicator		<p>Add text:</p> <p>Guest night records in areas of high value, complaints records, <b>New Zealand Angler Survey data.</b></p>	<p>The New Zealand Angler Survey, undertaken every seven years, provides a comprehensive view of visits to lakes and rivers.</p>
Page 117 (105), Part C: Implementation, page 117, Anticipated Environmental Result, AER 4.1, How indicators can be measured	Indicator		<p>Add text:</p> <p>Consenting decisions, evaluation reports, <b>District Plan esplanade reserve and strip requirements, Department of Conservation marginal strip requirements</b></p>	<p>An assessment of esplanade and marginal strip requirements in District Plans and conservation management strategies will provide a baseline on the level of protection that is given to riparian margins.</p>
Page 118(106), Anticipated Environmental	Indicator		<p>Amend text:</p> <p>Decrease in the number of call-</p>	<p>Amend to <b>complaints.</b></p>

Result (AER) 4.5			outs complaints for environmental and nuisance issues	
Page 150(133), definitions Glossary	Definition		Insert a definition of “pest”:  Pest, means an organism specified as a pest in a pest management plan	The proposed RPS currently lacks a definition of pest. This definition is obtained from section 2 of the Biosecurity Act 1993.
Page 134(120), Schedule 3	Significance Threshold	Support with amendments	Amend to include methods or guidelines as to how the matters interact and will be weighed.	This Schedule is positive in that it promotes transparency of decision-making. However, it does introduce some uncertainty – for instance, how many of the matters listed are required for a matter to assume significance.  This Schedule was not analysed in the section 32 report.
Page 136(121), Schedule 4	Criteria for the identification of natural features and landscapes	Support with amendments	Insert a definition for recreational values in associative attributes:  3 Associative attributes:  a) Whether the values are shared and recognised b) Cultural and spiritual values for takata whenua, identified by working, as	An important component in the identification of natural features and landscapes is recreational values and use.  The Schedule introduces some uncertainty – for instance, how many of the matters listed are required for a matter to assume significance.



			<p>far as practicable, in accordance with tikanga Maori; including their expression as cultural landscapes and features</p> <p>c) Historical and heritage associations</p> <p>d) Recreational values and use</p> <p>Amend to include methods or guidelines as to how the matters interact and will be weighed.</p>	<p>This Schedule was not analysed in the section 32 report.</p>
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