

SUMMARY OF DECISIONS REQUESTED

**on
Proposed Plan Change 5A
(Lindis: Integrated water management)**

**to the
Regional Plan: Water for Otago**

Abbreviations used in these summary pages

ORC	Otago Regional Council
l/s	Litres per second
MALF	Mean annual low flow
RPS	Regional Policy Statement
PRPS	Proposed Regional Policy Statement
NPSFM	National Policy Statement for Freshwater Management 2014
RMA	Resource Management Act 1991
PPC5A	Proposed Plan Change 5A (Lindis: Integrated water management)
Draft NESEFWL	Draft National Environmental Standard on Ecological Flows and Water Levels (2008)
RPW	Regional Plan: Water for Otago
S	A Section of the RMA

Preface

Proposed Plan Change 5A (Lindis: Integrated water management) to the Regional Plan: Water for Otago was publicly notified on Saturday 8 August 2015 in accordance with clause 5, Schedule 1 of the Resource Management Act 1991 (RMA).

The ORC received a total of 81 submissions on Proposed Plan Change 5A from a range of groups, organisations and individuals. 80 submissions were lodged within the statutory time frame specified, by 5pm on Friday 4 September 2015. One submission was received late and is marked accordingly. Indexes of submitters are provided by submitter number and alphabetically.

In accordance with Clause 7 of the First Schedule of the RMA, this document presents the summary of decisions requested by persons making a submission.

This document summarises the submissions in three ways:

Section 1: Grouped by Submitter - matters within the scope of the plan change

Section 2: Grouped by Provision - matters within the scope of the plan change

Section 3: Grouped by Submitter - matters outside the scope of the plan change

The full original submissions are available for viewing on www.orc.govt.nz

Under Clause 8, Schedule 1 of the RMA, certain persons may make a further submission, but only in support of, or opposition to, those original submissions received. That clause identifies the persons who may make a further submission as:

- (a) Any person representing a relevant aspect of the public interest; or
- (b) Any person that has an interest in the proposed plan change greater than the interest that the general public has.

Further submission forms are available from:

- ORC offices at:
 - 70 Stafford Street, Dunedin
 - William Fraser Building, Dunorling Street, Alexandra
- City and district council offices throughout Otago
- Public libraries throughout Otago
- www.orc.govt.nz
- By phoning 0800 474 082; or
- By emailing policy@orc.govt.nz.

Further submissions must state whether you support or oppose an original submission, and whether or not you wish to be heard on your further submission. A copy of your further submission must be served on the original submitter within five working days of making the further submission to the ORC.

Further submissions must be received at the ORC by 5pm, Friday 9 October 2015.

Note: The summary of decisions requested document does not contain macrons, as the submissions database used to prepare the document is not able to generate macrons.

Guide to Making a Further Submission

Important Information:

Under Clause 8, Schedule 1 of the Resource Management Act 1991, you may make a further submission if you are:

- (a) A person representing a relevant aspect of the public interest; or
- (b) A person that has an interest in the proposed plan change greater than the interest that the general public has.

A further submission may only be made in support of, or in opposition to an original submission. A further submission must state whether you support or oppose an original submission (or part thereof) and whether or not you wish to be heard on your further submission.

A copy of your further submission must be served on the original submitter to which your further submission relates, within five working days of making your further submission to the Otago Regional Council.

The Summary of Decisions Requested summarises the submissions received. If you intend to make a further submission, it is recommended that you read the full original submission, available for viewing at Otago Regional Council offices and www.orc.govt.nz

Please use the **Submitter Number and Reference Number** to clearly state what *submission point* you are referring to e.g. [submitter number / reference number].

This number is shown on the Summary of Decisions Requested by submitter (left) and by provision (right).

e.g. [53/13]

e.g. [53/13]

53 (name)

Ref
13

13 (provision)

Name	Number
(name)	53

Clearly state whether you support or oppose the decision requested you are making a further submission on.

Give the reasons for your support or opposition.

Use the Further Submission Form to help you set out your further submission.

It is in your best interests to make your further submission as clear as possible.

If you have any questions regarding how to prepare a further submission, please phone the Policy Team on 0800 474 082, email policy@orc.govt.nz or look online at www.mfe.govt.nz.

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80	Lindis Irrigation Ltd – Bruce Jolly
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Section 1:

Grouped by Submitter

(Matters within the scope of the plan change)

1 Bruce Lambie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set the minimum flow of the Lindis River at 1,000 l/s at the Ardour flow recorder.	<ul style="list-style-type: none"> • This is the minimum flow to maintain a healthy ecosystem. • The Lindis River has been historically very over-allocated. The situation has worsened with the arrival of intensive cattle farming and industrial scale irrigation via pivot irrigators. • The Lindis river is a very important spawning tributary of Lake Dunstan, and this needs to be enhanced, not compromised. • If there is insufficient flow, the trout fingerlings (as well as adult trout) are too easily eaten by predators and cannot return to the Clutha/Mata-Au.

2 Otago Natural History Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set the minimum flow higher to ensure the maintenance of the braided river flow through to the Clutha/Mata-Au, ie, that the lower Lindis flow should be maintained throughout the summer. That may require 1,000 l/s, or more.	<ul style="list-style-type: none"> • Maintaining the natural state of the Lindis is vital for the survival of the severely endangered wading birds (in particular the Black Stilt). • Everything possible should be done to reduce the water take from the Lindis River. • A healthy flowing river is desirable for the total ecology of the river (fish and other aquatic life). • The proposed changes need to ensure that the natural right of all New Zealanders to be able to swim in clean, fresh rivers in summer is restored.

3 Russell McKendry

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	The minimum flow should result in continuous flow throughout summer and connection to the main-stem of the Clutha/Mata-Au.	The proposed minimum flow of 750 l/s is risky and may be too little to sustain a healthy river. A minimum flow of 1,000 l/s is fair. 750 l/s is only 53% of MALF so a 1,000 l/s summer minimum flow has to be seen as a pragmatic compromise.

4 Tania Seward

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Set minimum river flow levels for the Lindis to ensure the longevity of this vital river system.	<ul style="list-style-type: none"> • Concern about the lack of flow in the lower Lindis during the summer months due to excess irrigation. • The rivers of Otago are critical to the region's biodiversity. • To have the Lindis not able to flow the whole way along its length in summer is negatively affecting the environment.

5 John Highton

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary	Schedule 2A - 1 Oct to 31	Amend	Set a minimum flow sufficient to	• Provides for the maintenance of the life supporting capacity of the

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	allocation minimum flow 750 l/s	May minimum flow for primary allocation		maintain a flow in the river at all times, and sufficient flow to provide a year round viable habitat for fish. This requires an absolute minimum of 1,000 l/s.	Lindis River. <ul style="list-style-type: none"> • Want to see continuous flow in the Lindis River year round so that the river can realise its full potential as a spawning stream, especially for the very vulnerable Lake Dunstan fishery. • It is distressing to see the Lindis dry at the main road bridge, and this occurs regularly in summer.

6 Hugh van Noorden

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Implement the proposed changes setting minimum flow rates.	<ul style="list-style-type: none"> • Supports all amendments that guarantee a minimal flow in the Lindis river bed. • Need to sustain the environmental integrity of the river as a living corridor, not as a mere seasonal drain.

7 Peter Sayers

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Raise the minimum flow to 1,000 l/s.	<ul style="list-style-type: none"> • The Lindis River can only be fished in the early part of the season. The river is a lost cause anytime after that. • Do not like seeing flows slow to the point where fingerlings (our resupply of stocks) are dying in the remaining pools.

8 Jan Finlayson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Amend	Support PPC5A but oppose the proposed 750 l/s summer minimum flow.	No reason given.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a minimum summer flow of at least 1,000 l/s, measured at Ardour Road.	<ul style="list-style-type: none"> • At 53% of MALF, 1,000 l/s is still a significant compromise. • Elevated temperatures and reduced capacity for dilution of contaminants remain as issues. • The draft NESEFWL suggests a minimum flow of 80% of MALF. However, the river is likely to be able to function meaningfully at 53% of MALF.

9 Otago Anglers' Association

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a summer minimum flow of at least 1,500 l/s, as measured at the Ardour Road flow recorder.	<ul style="list-style-type: none"> • Sympathises with irrigators' economic needs, but irrigators have known for 20 years this day would be coming. Entrenched agricultural interests have dominated resource use for too long. • ORC needs to set higher minimum flows on all rivers with a MALF of 5,000 l/s or less. • The draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of 5,000 l/s or less. The recommended minimum flow of 1,500 l/s equals 80% of MALF.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • A flow of greater than 1,500 l/s will ensure that there is a meaningful flow in the lower river, good water quality, cooler temperatures, and restore the natural character, amenity, and juvenile fishery values of the lower river. • A flow of 750 l/s is half of what a healthy stream needs, and in dry parts of Otago a small healthy, accessible stream is important for trout, native fish and for teaching young anglers. • The minimum flow proposed violates RMA S5(2)(b), S6(c), S7(c) and S7(h). • Deterioration during low flows threatens to continue killing aquatic life. • Restoring the Lindis to a fully functioning ecosystem would encourage a more diverse local and national economy. Irrigation interests should not be prioritised above the rest of the economy.

10 Gordon McManus

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt a minimum flow of 1,250 l/s.	<ul style="list-style-type: none"> • Have seen a dry bed on many visits to the Lindis where a river should be, which is unacceptable, and is due to past over-allocation which has to cease. • The RPW clearly states existing alternative water sources should be used in over-allocated catchments. Some farmers have invested in irrigation schemes that provide alternatives knowing that deemed permits expire in 2021. • A living river needs to be reinstated for all to enjoy and cherish.

11 Christine Rose

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Set minimum flow levels at a conservative limit to maintain a baseline that keeps water quantity, quality, temperature, BOD (Biochemical Oxygen Demand), and sediments at levels sufficient to protect and enhance its life-supporting capacity for an ideal mix of biological communities	Lindis has a special and rare quality in an important ecological setting and landscape. Its natural values should come first.

12 Quentin Smith

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Did not specify	Apply a reasonable minimum flow to the Lindis River.	<ul style="list-style-type: none"> • Rivers are the lifeblood of our environment. • The minimum flow is needed to maintain fisheries, freshwater ecology and amenity.

13 James Parker

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Support PPC5A.	No reason given.

14 John Batchelor

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt a minimum low-flow in the Lindis River of 1,200 l/s.	<ul style="list-style-type: none"> The draft NESEFWL recommends 80% of MALF. Therefore, a minimum flow of 1,200 l/s is not un-reasonable. There are other sources of water available in this area for irrigation. The Lindis River is the easy choice but must not be over-allocated.

15 Ella Lawton

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a summer (1 Oct- 30 Apr) minimum flow of at least 1,000 l/s, as measured at the Ardour Road flow recorder.	<ul style="list-style-type: none"> A flow of 1,000 l/s is 53% of MALF for the river and represents a considerable concession to irrigators. The draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of greater than 5,000 l/s. The farmers have had 30 years to transition to alternative water sources (eg groundwater and Clutha/Mata-Au), knowing that deemed permits expire in 2021. Some farmers have already invested heavily in irrigation schemes that provide alternatives. The RPW is clear that where alternative water sources exist in over-allocated catchments that these should be used instead. This decision defines the future of the Lindis River. If we do not ensure the health of the river from this point forward, we will say goodbye to it forever. The financial benefits of a few should not dictate the future of this precious common place.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	The winter minimum flow is supported.	No reason given.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	The primary allocation limit is supported.	No reason given.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	The supplementary regime is supported.	No reason given.

16 Johnny Mauchline

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow	Schedule 2A - 1 Oct to 31 May minimum flow for	Amend	Set a summer minimum flow of at least 1,000 l/s, as measured at the Ardour	<ul style="list-style-type: none"> A minimum flow of 1,000 l/s will ensure a meaningful flow in the lower river, good water quality, cooler temperatures, and restore the

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	750 l/s	primary allocation		Road flow recorder.	natural character, amenity, and juvenile trout fishery, eel, and native fish values of the lower river. <ul style="list-style-type: none"> • A minimum flow of 1,000 l/s, 53% of MALF, represents a considerable concession to irrigators. The draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of greater than 5,000 l/s. • The river is an excellent fishery and fishing the river brings benefits to the local economy. • Alternative water sources are available (groundwater and Clutha/Mata-Au) and some farmers have already invested heavily in irrigation schemes that provide alternatives. The RPW states alternative water sources that exist in over-allocated catchments should be used instead. • Farmers had 30 years to transition to alternative sources, knowing deemed permits expire in 2021.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	The winter minimum flow is supported.	The river is an excellent fishery and fishing the river brings benefits to the local economy.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	The primary allocation limit is supported.	The river is an excellent fishery and fishing the river brings benefits to the local economy.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	The supplementary allocation regime is supported.	The river is an excellent fishery and fishing the river brings benefits to the local economy.

17 Richard Sidey

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Require a summer minimum flow of at least 1,200 l/s.	Healthy rivers are essential to our region, for recreation and ecosystem, and a vital necessity to native fish and eel species.

18 Aliscia Young

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Require a summer minimum flow of at least 1,200 l/s.	Healthy rivers are essential to our region, for recreation and ecosystem, and a vital necessity to native fish and eel species.

19 Backcountry Matters

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Make the minimum flow figure not less than 1,000 l/s.	<ul style="list-style-type: none"> • A minimum flow of 750 l/s will have a significant deleterious effect on water quality, including temperatures and wildlife habitats, and represents about half the allowable figure in the draft NESEFWL.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • A minimum flow of 1,000 l/s would be an acceptable compromise and mean that native fish habitat would not be as degraded as at the proposed levels. • Alternative sources of water (Clutha/Mata-Au or groundwater) are available for irrigation.

20 Doug Peddle

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Enforce minimum flow rates.	For biodiversity and supporting long term sustainable farming practices.

21 Esther Whitehead

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Set a minimum flow for the river with allocation limits.	<ul style="list-style-type: none"> • To protect the Lindis river's lower reaches. • Irrigation for farming has become so detrimental to the Lindis that there is very little left of the water's natural ecosystem in summer months and this river is endangered unless we act now.

22 The Point Partnership

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Oppose	Oppose PPC5A; or amend as shown in the submission.	<ul style="list-style-type: none"> • Notified plan change will not achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW. • Evaluation of options was not carried out in accordance with RMA S32 • Notified plan change is inconsistent with the NPSFM which supports the use reasonable adjustment timeframes and requires the use of the best available information and scientific and socio-economic knowledge.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Include a longer transition period in this policy - to 2026 instead of 2021.	<ul style="list-style-type: none"> • Including the Lindis catchment in the existing paragraph (c) of this policy means the timeframes outlined in the explanation to the policy would apply to the Lindis catchment. This will result in a lack of a feasible transition period for irrigators to adjust to the minimum flow regime and primary allocation limit, change to more efficient irrigation systems and potentially transfer water rights to an alternative source. • Until we know the minimum flow conditions, the amount of water allocated to us in the consent renewal process and the total primary allocation on the river we cannot begin to design, arrange, finance and construct a new efficient system.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to a lower minimum flow of 450 l/s during 1 October to 31 May.	<ul style="list-style-type: none"> • Irrigators would be significantly adversely affected socially and economically, including for the following reasons: <ul style="list-style-type: none"> - The proposed minimum flow would have a devastating effect on

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>farming viability.</p> <ul style="list-style-type: none"> - It is totally out of balance as it gives a huge boost to the natural and iwi values at the expense of social and economic ones. - It does not reflect the consensus of the workshops that ORC held when the community was involved. • The amendment sought would enable people and communities to provide for their social and economic wellbeing while also meeting all legislative requirements focusing on protecting natural and iwi values.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Amend to a higher primary allocation limit of 1,500 l/s.	<ul style="list-style-type: none"> • The proposed primary allocation limit will result in reduced water availability and does not accurately represent the history of use within the catchment, and what could be irrigated efficiently with this water. • The proposed primary allocation limit will result in the following adverse social and economic effects. A cut from the current position of approx 4,500 l/s to 1,000 l/s is extreme and punitive.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	<ul style="list-style-type: none"> • Retain the proposed amendments to Rule 12.1.4, but amend Maps B4 and B7 to include the full extent of the true geographic boundary of the Lindis catchment. • Include a policy and rule which would exclude consents in this area from the proposed minimum flow. This policy and rule could be linked to the Tarras Creek sub-catchment, as a mapped area within the wider Lindis Catchment. 	<ul style="list-style-type: none"> • Opposes Rule 12.1.4 in so far as it is linked to maps B4 and B7, which identify the Lindis catchment. • Part of the true geographic area of the Lindis Catchment is excluded from maps B4 and B7 (the Tarras sub-catchment). This creates unnecessary complexity and uncertainty for farmers who irrigate within this area. • Creating an arbitrary boundary for the catchment to exclude the Tarras Creek catchment from a minimum flow is a very blunt instrument to achieve this. • Notified plan change will result in dividing a small community by splitting it with an arbitrary boundary which denies some from reapplying for their water rights.

23 Duncan Wilcox

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Establish, maintain & enforce viable water flows for the Lindis River system and effectively manage extraction to minimise any detrimental environmental damage.	<ul style="list-style-type: none"> • In support of improving the Lindis minimum flows so that it is a viable waterway that supports aquatic species, wildlife and human recreation. • Opposed to the abusive use of Central Otago waterways for solely monetary gains by a few to the detriment of the many. New Zealand's rivers are in a steady state of decline and any and all actions need to be taken to reverse this trend. • A river is a treasure, offering a necessity of life that must be rationed among those who have power over it. • To ensure that the Lindis is here to stay, not part of the 'win the war (profits in the short term), lose the battle (loss of our environment)' mentality that dominates today's thinking.

24 Ian Cole

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Support PPC5A with the exception of the proposed minimum flow provision of 750 l/s.	<ul style="list-style-type: none"> The full spawning potential of the Lindis has been historically compromised under depleted river flows. The local and wider communities of the area have an historic opportunity to restore river flows to more environmentally sustainable levels for long-term wider community benefits. While it is recognised that water is a crucial factor to long term economic viability of the local community alternatives do exist. The limited potential contribution of the Lindis is insignificant compared to other water take alternatives.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to a minimum summer flow of 1,000 l/s.	<ul style="list-style-type: none"> There are significant mortalities, strandings and barriers to out-migration of juvenile trout under low flows. An increase in the summer minimum flow to 1,000 l/s is far more likely to ensure connectivity to the Clutha/Mata-Au, improve the sports fishery and enhance the recreational amenity afforded by the river. The local and wider communities of the area have an historic opportunity to restore river flows to more environmentally sustainable levels for long-term wider community benefits. While it is recognised that water is a crucial factor to long term economic viability of the local community alternatives do exist. The limited potential contribution of the Lindis is insignificant compared to other water take alternatives.

25 Future by Design Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a minimum flow of at least 1,000 l/s during the summer period.	<ul style="list-style-type: none"> Summer minimum flow of 1,000 l/s is "reasonable" and allows some capacity for irrigation. Lindis flows can be very low in mid-Summer. It is a magnificent part of the country and maintaining a reasonable flow is an essential part of the local ecology. 1,000 l/s is just over half of the river's MALF and given that the draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of greater than 5,000 l/s A 750 l/s summer minimum flow is out of line with national requirements and will have a substantially deleterious effect on the river ecosystem.

26 Clutha Mata-Au River Parkway Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow	Schedule 2A - 1 Oct to 31 May minimum flow for	Amend	Decide in favour of a summer minimum flow of at least 1,000 l/s, as measured at	<ul style="list-style-type: none"> A summer minimum flow of at least 1,000 l/s would: <ol style="list-style-type: none"> maintain aquatic ecosystems and support native species (such as

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	750 l/s	primary allocation		the Ardgour Road flow recorder.	<p>koaro, the endangered longfin eel and Clutha flathead galaxias, common bully, and upland bully);</p> <p>b) support brown and rainbow trout, during spawning and juvenile rearing, and give some surety to the river as a fishery and as a breeding habitat; and</p> <p>c) maintain the natural character of the river and its general amenity values, providing local people and visitors with reliable sites for summer picnics and swimming etc.</p> <p>• The farmers in the region are fully aware that the river is subject to low summer flows and that it cannot be considered a reliable source of irrigation water. They have had 30 years to transition to alternative water sources and/or adapt their farming practices, knowing that deemed permits expire in 2021.</p>

27 Claas Harvest Centre Otago

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Oppose the minimum flow of 750 l/s to be applied in 2021.	<ul style="list-style-type: none"> • A minimum flow of 450 l/s causes too much economic hardship. • Reliability of irrigation under the proposed minimum flow will not be sufficient to grow crop (e.g. grow fodder) beet economically. Reduction in production and increase in drought-tolerant species will result in dramatic decrease of the economic viability of farms. • The proposed minimum flow and resulting need for farmers to move to lower costs of production in turn will result in fewer sales and less plant replacement, and likely less use of local contractors who work within the Tarras/Lindis area.

28 Gerald Telford

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Provide a fair transition time to make necessary changes.	Provides a pathway to balance enhanced river low flow and ensures continued farming with efficient water practices.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a minimum flow of 450 l/s (being more than double the existing 200 l/s).	<ul style="list-style-type: none"> • Provides a pathway to balance enhanced river low flow and ensures continued farming with efficient water practices. • The livelihoods of the members of the Lindis Catchment Group are connected to the river flows and with this comes the responsibility to all users both commercial and recreational. • The Lindis Catchment Group can continue under new and better practice to draw the water deemed necessary to support their agricultural operations and believes the increased flows outlined by the group will have considerable benefit for the continued health of the present fishery. • The Lindis is a fine, if not always consistently healthy, self-sustaining fishery. • No one owns the water; it belongs to the community, locally and

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Set a primary allocation of 1,500 l/s (being appreciably less than existing).	<p>nationally.</p> <ul style="list-style-type: none"> • Provides a pathway to balance enhanced river low flow and ensures continued farming with efficient water practices. • Many water users have invested in more reliable water sources that offer better long term investment outcomes. This makes more water from the Lindis River available to water users that do not have access to an alternative water source. Users with no alternative water source must use water wisely and to provide for the best outcomes of the whole community. • The livelihoods of the members of the Lindis Catchment Group are connected to the river flows and with this comes the responsibility to all users both commercial and recreational. • The Lindis Catchment Group can continue under new and better practice to draw the water deemed necessary to support their agricultural operations and believes the increased flows outlined by the group will have considerable benefit for the continued health of the present fishery. • No one owns the water; it belongs to the community, locally and nationally.
33	Matters beyond the scope	Matters beyond the scope of the Plan Change	Not Applicable	Proactive management by ORC to occur.	<ul style="list-style-type: none"> • ORC, at times, seems out of step with local communities to enhance recreational usage. • There is the potential to highlight the Lindis as a model to showcase a new regime and desire by all groups involved in this process to deliver positive community outcomes and environmental standards.

29 Kent McElrae

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Support	Maintain the minimum flow of 450 l/s.	<ul style="list-style-type: none"> • Restrictions on irrigation will drastically reduce the productivity of my land and reduce the value of my property. • Lindis has great soils, with huge potential. • Restrictions on irrigation will have a social impact on the number of people moving to the area (e.g. school needs more kids for teachers).

30 Rebecca McElrae

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Oppose	Provide longer timeframe for change; 2026 till minimum flow applies.	<ul style="list-style-type: none"> • Lack of transition rules to assist the change. • Much has to be done that requires cohesion, money, time, access, etc.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • The proposed minimum flow of 750 l/s will affect the community in a very negative way (loss of jobs, loss of farm viability, fragmentation of the community, migration from the area).

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Currently, we have a strong community which is growing and this provides a sense of wellbeing for all who live here. • The school, which has been a major part of building our strong community, will close should the proposed minimum flow of 750 l/s be adopted, as people will leave the area. We want our children to experience going to a rural school and learning the values that can only be provided by a small rural community.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Set primary allocation of 1,500 l/s.	To more accurately align with current primary block.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Use geographic maps instead of the proposed Maps B4 and B7.	Maps should not have random exclusions.

31 Bendigo Station

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Did not specify	Provide a flexible timeframe.	There is a lack of transition time rules and the timeframes are inflexible.
30	Implementation	Implementation - Other requests	Amend	Enable opportunities to move takes and apply innovation and new technology to existing rights.	There is a lack of opportunities to move takes and to apply innovation and new technology.
30	Implementation	Implementation - Other requests	Amend	Provide innovative ways to create surface flows in the lower reaches of the Lindis that would alleviate the need to reduce existing water usage for farming purposes under the current proposal.	Innovative ways to create surface flows are lacking.

32 Adam Spiers

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Any minimum flow applied to take effect no sooner than 2026.	<ul style="list-style-type: none"> • The cost to irrigators of the required efficiency improvements and sourcing from alternative sites (engineering, legal, negotiation, and regulatory) is huge. • The time required for irrigators and community to adjust and form new groups and develop alternate plans is significant. • The delay in ORC implementing the minimum flow has resulted in a significant burden of change on the community and it is already 2015.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Apply a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • The suggested 450 l/s minimum flow returns over 250 l/s of currently abstracted water to the river and improves the health of the river markedly. • The suggested 450 l/s minimum flow was until recently the recommended flow of the ORC.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Have a primary allocation block of 1,500 l/s.	<ul style="list-style-type: none"> • The current primary allocation block is 4,000 l/s. • There is no merit in squeezing the primary allocation block down

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					as low as 1,000 l/s and giving current irrigators even more uncertainty about the value of their permits.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Include maps in the B-series of the Water Plan Maps that represent the true geographic area of the Lindis catchment.	<ul style="list-style-type: none"> The geographic map for the catchment is the most practical and logical way to proceed. Excluding one side of the valley from the map is confusing and not based on any investigation or assessment.

33 John Davis

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	Provide a much more holistic approach to total river management.	<ul style="list-style-type: none"> PPC5A will not enable people and communities to provide for social and economic wellbeing, as provided for in the RMA. The effect of this change to the Tarras district and community will be severe and long-lasting. ORC has not officially looked at mitigating the minimum flow by: <ul style="list-style-type: none"> a) Supplementation of water in low flow time from the Clutha/Mata-Au. b) Looking at allowing fish to navigate through a pipe. c) Removing gravel and improving the channel flow in the lower Lindis. d) Enhancing flow by removing a large percentage of willows, leaving strategic trees for picnic spots, camping, and fish shade. e) Enhancing fishing experience by managing willows in the river's assigned course. Renew attempts to "tidy the river". a) f) Better active fish management. There has been little interest in the Lindis as a fishery. If, as is claimed, this is so important for fish spawning, why is there no attempt to physically move small fish up or down stream in times of low flow?
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Provide an extended "lead in time".	<ul style="list-style-type: none"> People and the local community, who have been using Lindis water for generations, need extended "lead in time" to adjust to any minimum flow, as efficient methods of irrigation take time and money. Lindis irrigation, where able, will need to shift irrigation takes from gravity to pump and will need easements, intake requirements, energy requirements, as well as the full complement of on-farm adjustments, not to mention the availability of finance. All this will have to be carried out over multiple years after present permits expire.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	A more equitable minimum flow of 250 l/s for all values.	<ul style="list-style-type: none"> Science behind the increase in the minimum flow smacks of "getting science to fit an outcome". The ORC had already decided on a 450 l/s minimum flow in the Lindis and, without further consultation, increased this to 750 l/s. Other parties besides the local community were aware of this and the local community found this out by my chance attendance at an

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>address given to a local group in Wanaka by a fish expert.</p> <ul style="list-style-type: none"> • There are many flaws in the data used in the S32 evaluation. To have one year of flow information (photos) is not sufficient on which to base flow rates to the Clutha/Mata-Au. It was a prolonged dry period last year. • The effects of minimum flow of 750 l/s will be devastating for land based activities and the wider community for the following reasons: <ul style="list-style-type: none"> a) “loss of use” is equivalent to removing 1,500 ha of irrigation (using the efficiency of use formula of 0.5 l/s/ha); b) the “percentage restriction” to achieve a minimum flow of 750 l/s spread over all takes means efficient irrigation will not happen over long periods in summer; c) the availability of water for efficient irrigation is crucial to the activities carried out with irrigation. Crops and pasture cannot be grown without sufficient and reliable water at the correct time; d) Tarras is one of the driest areas of NZ, and the effect of not having water available in sufficient quantity will flow onto loss of land-based income, flowing to the wider community, employment, contractors, farm services, and more. • The protection of native fish could be mostly achieved at 250 l/s. Any increase in trout numbers may increase predation on galaxiids. • Trout have adapted to their environment and are managing to exist in the river now with good stocks in the middle reaches. With a change in position of takes, their habitat is greatly enhanced, with full connectivity above the Ardour monitoring site. • Iwi values will be maintained and enhanced and Iwi expectations could mostly be achieved with water flowing to the Clutha/Mata-Au most of the time. • With the change in takes over time and phasing out gravity races and replacing them with pumping takes much further downstream, a much enhanced flow in the river will allow an even better continuous flow of water. • Land-based activities and the local community would have a better outcome with 250 l/s than at 750 l/s. • Submitter will not be able to maximise efficient use of 3 recently installed centre pivot. Water supplies could drop to 10% in dry seasons, not allowing important and expensive crops to be grown. • Native fish values will be protected at 450 l/s. Galaxiids occur in many tributaries, currently protected by limited trout in the main stem. Any increase in trout habitat will lead to increased predation on galaxiids and man-made barriers are not straightforward to implement.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	The primary allocation limit of 1,000 l/s should be raised to a more sensible and reasonable level of 1,500 l/s.	To more fairly reflect past history and allow for that water to be used more efficiently.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Did not specify	If any restrictions are imposed it should apply to the total catchment area if there is an alternative supply.	Maps exclude parts of the Lindis catchment from using Lindis water when there is potentially water available (but at a very high cost) from the Clutha/Mata-Au.

34 Jay Cassells

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	As submitted by Fish and Game	A minimum flow of at least 1,000 l/s is appropriate. See reasons advanced by Fish and Game.

35 Ainsley Shearing Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • A 750 l/s minimum flow to be applied in 2021 causes too much economic hardship. • Decreasing the availability of water would have a profound effect on my business and workforce and has the ability to affect a lot of people's livelihoods. • Have seen farming practices change as farmers have had to adapt in very trying times to make their farms viable.

36 Clutha Sports Fisheries Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Support PPC5A conditionally; confirm provisions other than summer minimum flow.	Generally supports PPC5A with the exception of the summer minimum flow provision of 750 l/s.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend the summer minimum flow of 750 l/s applying from 1 October to 31 May to 1,000 l/s or higher and that flow to apply from 1 October to 30 April each year.	<ul style="list-style-type: none"> • Sports fisheries values: Lake Dunstan and the Upper Clutha/Mata-Au sustain a very significant recreational fishery for rainbow and brown trout and to a lesser extent salmon. The Lindis is a high value spawning and rearing water except that its full potential is limited by depleted flows, fish strandings and mortalities, and barriers to outmigration of juvenile trout when disconnection occurs. Extending summer minimum flows into May encroaches on a time when fuller flows are required in-river. The Lindis is also a small stream fishery in its own right and improved river flows will restore adult habitat in presently depleted reaches. • Native fish habitat values: The Lindis provides habitat for a range of native fish, including rare non-migratory galaxiids, bullies and eels. Bullies suffer heavy mortalities under the present flow regime. Eels are also regularly found in the river. With restored flows,

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>Contact Energy Ltd's obligations under RMA consents to provide upstream passage will result in the river becoming a more important eel habitat in the future.</p> <ul style="list-style-type: none"> • Wildlife habitat: Flows need to be increased to restore wading bird habitats in the lower reaches, including braided characteristics, below Lindis Crossing. • Even under the present flow regime the Lindis is popular for outdoor recreation over summer for activities including camping, picnicking, swimming and fishing. The river's relatively small size provides a safe alternative for family recreation involving children. Depleted summer flows limit the river's recreational potential. Downstream of Lindis Crossing camping opportunities are lost when the river dries up. • Life-supporting capacity of the river: Under the present flow regime river ecosystem functioning is first degraded and then lost altogether as the river flow drops over summer and eventually ceases altogether in some reaches. This is a failure in environmental management. Sufficient flows must be restored to the river to maintain in a healthy state and to limit high water temperature and nutrient levels. No Lindis water should be available for use outside of the Lindis catchment. Any such takes should be returned to the Lindis River for environmental benefit. • Landscape values: The routine loss of flow in the lower river reaches over summer diminishes landscape values. The minimum flow needs to restore the Lindis as a landscape feature within the valley.

37 Matthew Sole

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a summer minimum flow of at least 1,440 l/s, as measured at the Ardgour flow recorder.	<ul style="list-style-type: none"> • The Lindis has a long history of over-allocation. Mining privileges were allocated with no or little understanding of river systems and with no regard for instream values. • Progress is being made by land users on alternative water sources and more efficient application. • Where alternative water sources (groundwater and Clutha/Mata-Au) are available to land users in over-allocated catchments these should be used. The need to transition to alternative sources has been clearly signalled with a thirty year time frame. • Now is the time to change water extraction practices to reinstate meaningful natural flows in the lower river and provide for good water quality, cooler temperatures, natural character, amenity and fishery values. • Land management practices need looking at in relation to water

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>harvesting with a view to reversing the significant degradation of our upland tussock and inter-tussock species and their natural water collection and holding systems and functions. This is a contributing factor to the quality and availability of water inflows and recharge.</p> <ul style="list-style-type: none"> • A minimum flow of 1,440 l/s is the draft NESEFWL's recommendation of 80% of MALF for rivers with a median flow of greater than 5,000 l/s. • The amenity experience of a river is closely related to the level of flow within the river. For the Lindis, this means a functioning and healthy braided river system in the lower reaches. Not dry stones and dewatered hollows and stressed riparian values.

38 Philip Parcell

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
30	Implementation	Implementation - Other requests	Not Applicable	All of the natural flow of Church Creek, to be preserved with no irrigation takes allowed.	<ul style="list-style-type: none"> • Need to preserve the bird life supported by Church Creek, which is a very important part of my enjoyment of the amenity of my property. • Church Creek, which if left undammed with no irrigation, does flow into the Lindis at Lindis Crossing at times of high flow. • Church Creek and its natural lagoons have been home to Blue herons, Oystercatchers, Stilts and Plovers. • It seems ORC is determined to close the magnificent 80 year old Tarras Irrigation Scheme, which is a low cost, gravity scheme that irrigates 20 plus farms successfully. • The Lindis remains an excellent fish hatchery even after 80 years of irrigation, and swimmers can always go to Lake Dunstan which also has excellent toilet and camping facilities. • Submitter does not have any easements to access the Clutha/Mata-Au and have not met with any success in trying to negotiate "future proof" easements. Also, for the size of the farm, any irrigation supply from the Clutha/Mata-Au is uneconomic.

39 Cloudy Peak Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Any minimum flow to take effect no sooner than 2026.	<ul style="list-style-type: none"> • The cost to irrigators of the required efficiency improvements and sourcing water from alternative sites (engineering, legal, negotiation, and regulatory) is huge. • The time required for irrigators and community to adjust and form new groups and develop alternate plans is significant. • The delay in ORC implementing the minimum flow has resulted in a significant burden of change on the community and it is already 2015.
6	Irrigation season primary	Schedule 2A - 1 Oct to 31	Amend	Apply a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • The suggested summer minimum flow of 450 l/s returns over 250

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	allocation minimum flow 750 l/s	May minimum flow for primary allocation			<p>l/s of currently abstracted water to the river. It improves the health of the river.</p> <ul style="list-style-type: none"> • Up until recently 450 l/s was the recommended summer flow of the ORC. • Submitter fully supports the benefits of a summer minimum flow of 450 l/s to other members of the community and the survival of young trout. • We have already made a considerable investment into spray irrigation that was required to fulfil our obligations for our resource consent. • For the ORC to not take into account the real impact that losing another 250 l/s of totally reliable water will have on farms in the area is seen as a real failure. • The economic report did not make any effort to understand the needs of irrigators. I find this very disquieting, and displays a lack of respect for those that rely on this river to make their living.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Have a primary allocation block of 1,500 l/s	<ul style="list-style-type: none"> • The current primary block is 4,000 l/s. • There is no merit in squeezing the primary block down as low as 1,000 l/s and giving current irrigators even more uncertainty about the value of their permits.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Include maps in the B-series of the Water Plan Maps that represent the true geographic area of the Lindis Catchment.	The geographic map for the catchment is the most practical and logical way to proceed. Excluding one side of the valley from the map is confusing and not based on any investigation or assessment.

40 Fraser Hocks

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to at least 1,000 l/s.	<ul style="list-style-type: none"> • A dry river bed is a dead river bed. Without water in our rivers we simply don't have a river. • The Lindis stream acts as a major spawning tributary for the catchment. • Without a minimum flow of at least 1,000 l/s fish are unable to survive in this river.

41 Mike Lane

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to at least 1,000 l/s.	<ul style="list-style-type: none"> • A dry river bed is a dead river bed. Without water in our rivers we simply don't have a river. • The Lindis stream acts as a major spawning tributary for the catchment. • Without a minimum flow of at least 1,000 l/s fish are unable to survive in this river.

42 J.C.A Lucas

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	For those properties with recently upgraded border dyke irrigation and family succession the time frame needs to be extended by at least 5 years.	<ul style="list-style-type: none"> • Lack of transition rules to assist the change. • For those properties with recently upgraded border dyke irrigation and family succession the time frame needs to be extended to lessen the financial burden for the younger generation.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	That the maximum Lindis River minimum flow be no greater than 450 l/s.	The Tarras district relies on irrigation to maintain farming production, population and services.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Oppose	The primary allocation limit is opposed.	The Tarras district relies on irrigation to maintain farming production, population and services.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Oppose	Proposed Maps B4 and B7 are opposed.	No reason given

43 Upper Clutha Angling Club

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	That a minimum flow of not less than 1,000 l/s be set for the Lindis River during the summer period, measured at Ardour Road bridge.	<ul style="list-style-type: none"> • Supports the setting of minimum flows for the Lindis River. • Excessive water abstraction has compromised a healthy aquatic environment in the Lindis. The very low flows that have occurred over extended periods in the summer due to abstraction threaten fish populations. Drying reaches of the river often result in both adult and juvenile fish mortality due to stranding, heat stress, lack of oxygen and predation. • The Lindis is not considered a particularly good fishing river. It is highly likely that a major factor influencing this is the degraded state of the lower river reaches in the summer. Restoration of a healthy summer environment in the Lindis through a suitable summer flow regime may result in an improved fishery. • The Lindis is an important trout spawning stream, contributing fry and fingerlings to Lake Dunstan which is a very important recreational fishery. The populations of sport fish in our lakes are entirely dependent on continued access of both adult fish and juveniles to and from the spawning grounds that lie in the inflowing rivers. • A minimum flow of 750 l/s is not sufficient to maintain continuous stream flows and fish passage to and from Lake Dunstan during the critical summer period. There is strong scientific evidence that the proposed summer minimum flow of 750 l/s would result in significant adverse effects on fish stocks in the Lindis River and on aquatic ecosystem. • There is insufficient economic benefit from the additional 250 l/s being available for abstraction under a 750 l/s minimum regime compared to a 1,000 l/s minimum to offset this adverse environmental impact.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Research has shown that a minimum flow of 1,000 l/s during the summer period would be sufficient to maintain surface flows, and thus a connection and migratory pathway for fish to and from Lake Dunstan. • A minimum flow of 1,000 l/s during the summer period will help to mitigate the full impact of any stressors (naturally low flows, high temperatures and predation) impacting fish and would substantially improve the recreational amenity of the river for anglers and other users.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Support.	Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	Support.	Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Support.	Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.
37	Maximum allocation regime for the Bendigo-Tarras Basin	Schedule 4A - Maximum allocation limits	Support	Support.	Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.

44 Timburn Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	Amend PPC5A as per Lindis Catchment Group.	<ul style="list-style-type: none"> • The Lindis plays a huge part in the ability to farm our property and enjoy the lifestyle, community and recreation supported by this environment. • A fair outcome of this plan change process should mean that the community can carry on as it has for years and should not be pushed into financial hardship.

45 Lindis Downs Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the	Policy 6.4.5, including	Amend	Amend to include a longer transition	Extension of the transition time needed to allow irrigators to set up

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	Lindis Catchment	transition timeframes		Policy - extend to 2026.	more efficient irrigation systems without financial strain over a longer period of time. Water users need more time to adjust once the minimum flow is set.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to lower the summer minimum flow to 450 l/s	<ul style="list-style-type: none"> Proactive irrigators have adjusted to more efficient water use systems after being led to believe the minimum flow recommended by ORC was to be set at 450 l/s. During an extended dry period irrigators would be running at 50% or less if the minimum flow was set at 750 l/s. This is an uneconomical return on capital investment. It is yet to be proved in an extended dry season that a minimum flow of 750 l/s would ensure Lindis River flows reach the Clutha/Mata-Au.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Amend to include all geographic areas of the Lindis catchment.	This rule has caused confusion and there has been no reason or explanation given to exclude areas from the Lindis catchment.

46 Bruce Jolly

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	There needs to be a transition period between the expiry of deemed permits and the enforcement of the minimum flow.	With the change from Deemed Permits to RMA consents there will be a number of additional conditions, including changing of take points and distribution infrastructure to meet efficiency requirements. This will have an environmental benefit for the river.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend irrigation season minimum flow.	<ul style="list-style-type: none"> Water for irrigation is a vital part of the economic viability of farming and any decrease in water availability will have an effect. The irrigated land gives farming businesses robustness. In this environment the farms need more resilience to adverse events than most other areas of New Zealand, and irrigation is key to resilience. The major gains for river environmental health are made from moving the default minimum flow of 200 l/s to 450 l/s. Any environmental gains from a minimum flow above 450 l/s are very minimal. The economic and social impact from moving the minimum flow from 200 l/s to 450 l/s is reasonably minor if there is a transition time. The economic and social impact of a minimum flow of 750 l/s would be harsh and crippling to long term viability. Commenced a change to sprinkler irrigation based on the assumption ORC would adopt a 450 l/s minimum flow and infrastructure was designed for the reliability that would allow. At 750 l/s the reliability of water supply plummets.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	The primary allocation limit should be in the 1,500 l/s to 1,600 l/s range.	<ul style="list-style-type: none"> The proposed primary allocation limit is too far away from anything that it will get down to. A suggested primary allocation limit in the 1,500 to 1,600 l/s range better reflects the area of land irrigated and volumes of water used.
15	Ardgour Road Minimum	Schedule 2A and 2B -	Support	The monitoring site is supported.	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	Flow Monitoring Site	Monitoring site			
16	Groundwater connected to Lindis River	Schedule 2C - Lindis Alluvial Ribbon Aquifer	Support	The Lindis Alluvial Ribbon Aquifer is supported.	No reason given.
27	Section 32	Section 32 Report	Not Applicable	More weighting should be given to the pre-April Draft S32 Evaluation Report, where the science detail supports 450 l/s.	The S32 Evaluation Report: a) is seriously flawed and the social and economic evaluation could not stand up in a court hearing. b) does not provide supporting documentation to the percentages used in the various options under economic costs/risks. c) does not mention other ways of meeting the environmental gains required, other than minimum flow. Transition issues and other tools that could be used to enhance the outcomes have been disregarded, or policy enabling them are already in place.
30	Implementation	Implementation - Other requests	Not Applicable	Provide an enabling policy from local and central government to streamline the process to access alternative source.	<ul style="list-style-type: none"> Those that do not boundary the Clutha/Mata-Au would be seriously challenged to access alternative sources. The process to access alternative source is not very achievable for most individuals.

47 Malvern Downs Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Did not specify	Provide full consideration of the community's identified values, specifically those relating to the 'availability of water for irrigation during the growing season'.	<ul style="list-style-type: none"> ORC has not met its planning responsibilities. Full consideration of the community's identified values must be provided for, specifically those relating to the 'availability of water for irrigation during the growing season'. To date, present and future impacts have not been appropriately considered or evaluated.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Adopt an appropriate and realistic transitioning framework for the Lindis Catchment. This should enable an extension of minimum flows for at least 5 years post expiry of deemed permits (mining privileges) - at minimum until 2 October 2026.	Irrigators cannot invest in new irrigation systems and infrastructure as long as they don't know if their water rights will be renewed.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt Option 2 of the 'Options for managing surface water in the Lindis Catchment' and set, under Schedule 2A, for the Lindis River Catchment, a primary allocation minimum flow as follows: 750 l/s October to November 450 l/s December to April 750 l/s May	<ul style="list-style-type: none"> A summer minimum flow of 450 l/s is in line with ORC's science, reports and evaluations over a 6-7 year period and ORC-promoted 450 l/s at a public meeting in Tarras. Water from the Lindis is the 'life blood' of Tarras. The Lindis river is unique, in that most years it goes dry - "water goes underground and comes up 5 km downstream". Water users have always worked together in dry times to ration the water fairly for all the water uses. The priority permit holders have always taken cuts just like the rest of the water permit holders. A summer minimum flow of 750 l/s would mean 60 days in the middle of summer where we wouldn't have water and would put the

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					livelihoods of my family and employees in jeopardy. • The RMA clearly states that you can't put livelihoods at stake.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Adopt under Schedule 2A, for the Lindis River Catchment, a primary allocation minimum flow as follows: 1,600 l/s June to September.	This is in line with ORC's own science, reports and evaluations over a 6-7 year period.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Adopt a primary allocation limit of 1,500 l/s, rather than the only other option (1,000 l/s) considered.	A primary allocation limit of 1,500 l/s is more workable and appropriate.
22	Mapping of the Lindis Alluvial Ribbon Aquifer	Map C-series: C5, C6 - Lindis Alluvial Ribbon, Ardour Valley, Bendigo and Lower Tarras Aquifers	Amend	Retain the existing boundaries of the Lindis Alluvial Ribbon Aquifer.	No reason given.
27	Section 32	Section 32 Report	Did not specify	Consider the S32 Evaluation Report inadequate.	The S32 Evaluation Report should be considered inadequate.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Adopt Option 2 of the 'Options for managing surface water in the Lindis Catchment'	This is in line with ORC's own science, reports and evaluations over a 6-7 year period.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Include the Tarras Creek catchment in the proposed B-series maps and retain existing boundaries of the Lindis Alluvial Ribbon Aquifer.	• Strongly opposes the boundary changes for the lower Tarras catchment and the ORC insisting we go to another water source. • To get water from an alternative source we would have to own land beside the river, then need at least five easements through other land owners' land before we could get water to our own property. This would be cost prohibitive for our farming operation.
38	Restrictions for groundwater takes - other requests	Schedule 4B.2 - Restrictions on groundwater takes	Oppose	Delete reference to the Bendigo and Lower Tarras Aquifers from Schedule 4B.2.	No reason given.

48 John and Marilyn Barlow

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Support PPC5A except summer minimum flow proposed.	Generally supports PPC5A with the exception of the summer minimum flow proposal of 750 l/s.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Provide a minimum flow of 1,000 l/s or over as the minimum summer flow from 1 October to 31 May.	• As public property post-cancellation of deemed permits, the Lindis should return to its natural character and retain a connection to the Clutha/Mata-Au throughout the year. • A major portion of Lindis water is used outside its physical catchment. This water should be replaced by water from alternative sources as the Lindis is a small and fragile stream. • The Lindis is an important spawning stream supporting the fishery in the Clutha/Mata-Au and Lake Dunstan. • The Lindis is used recreationally by a wide variety of users who should be able to see the river as a river and not as a dry stream bed.

49 Gavin James

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Proposed summer minimum flows below the Ardour Road flow recorder need to be increased.	<ul style="list-style-type: none"> Based on the IFIM data available for juvenile brown trout, summer minimum flows (October to April) should be at least 1,000 l/s and probably nearer to 1,500 l/s to provide adequate habitat for juvenile trout. The lower reaches of the river frequently dry up in summer thus destroying juvenile trout and other fish in this very important spawning and rearing tributary of the Clutha/Mata-Au River and Lake Dunstan.

50 Environmental Defence Society Incorporated

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to 1,000 l/s.	<ul style="list-style-type: none"> Submitter opposes the proposed minimum flow as it: <ol style="list-style-type: none"> does not adequately provide for/have regard to the purpose and principles of the RMA, does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, is inconsistent with the PRPS and Otago's Conservation Management Strategy. Suggested amendment promotes the sustainable management of the natural and physical resources in the region, to comply with the RMA and give effect to the NPSFM and the relevant regional policy documents.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend the summer minimum flow season from 1 October to 31 May to 1 October to 30 April.	<p>The proposed minimum flow:</p> <ol style="list-style-type: none"> does not adequately provide for/ have regard to the purpose and principles of the RMA, does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, a) c) is inconsistent with the PRPS and Otago's Conservation Management Strategy.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Amend	Amend the winter minimum flow season from 1 June to 30 September to 1 May to 30 September.	Support for the winter minimum flow of 1,600 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	Support the primary allocation limit of 1,000 l/s, conditionally.	<ul style="list-style-type: none"> The proposed primary allocation limit of 1,000 l/s is slightly higher than the default limit set by Policy 6.4.2 of the RPW. Support for the primary allocation limit of 1,000 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
16	Groundwater connected to Lindis River	Schedule 2C - Lindis Alluvial Ribbon Aquifer	Support	Support treating connected groundwater as surface water.	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
26	Minor and consequential	Minor and consequential changes	Amend	Amend as is necessary to address the issues raised in the submission including any minor or other consequential relief.	Nor reason given.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Support the supplementary allocation regime, conditionally.	<ul style="list-style-type: none"> • The proposed supplementary flows are more permissive than the default regime. • Submitter is conditionally supportive of this to enable harvesting to occur to encourage irrigators to lessen their reliance on primary allocation from the Lindis. • Support for the supplementary allocation regime is conditional upon the summer minimum flow being raised to 1,000 l/s, the summer minimum flow season amended to 1 October to 30 April, and subsequent amendments to the winter minimum flow season.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Support	Support the maps of the catchment boundary.	Supports the mapping of the boundaries of the catchment for the purposes of the minimum flow.
37	Maximum allocation regime for the Bendigo-Tarras Basin	Schedule 4A - Maximum allocation limits	Support	Support the aquifer allocation limits.	Supports the setting of maximum allocation limits for specified aquifers within the Bendigo-Tarras Basin (the Ardour Valley, Bendigo, and Lower Tarras aquifers).

51 Bryan Wrighton

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Mandate that the minimum water flow for the Lindis is kept well above 1,000 l/s.	<ul style="list-style-type: none"> • This is a precious river, and up to now one of the very few “as God made it” rivers. • To have a minimum flow of less than 750 l/s will seriously degrade this wonderful resource. • I am a fly fisherman and enjoy the river, but more than that I want to preserve one of the few truly natural rivers in the country

52 Peter William Jolly

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Provide for a longer transition period.	Longer transition period required for farmers to assess the effect of any minimum flow so as to be confident that the available water will be reliable enough to make increased costs associated with alternative forms of irrigation economic.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Set a summer minimum flow of no more than 450 l/s.	<ul style="list-style-type: none"> • No logical reason to set a minimum flow of 750 l/s. A high minimum flow will adversely affect the economic and social wellbeing of the community and thus be inconsistent with the purpose and principles of the RMA. • With a high minimum flow the water supply reliability becomes so low that it is uneconomic to sustain investment in upgraded forms or irrigation. • A minimum flow of 450 l/s is a much better balance, both economically and environmentally.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Amend to a higher primary allocation limit.	The proposed limit creates too much uncertainty around water reliability and will have a detrimental effect on the economics of investment in upgraded irrigation systems.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Amend the catchment boundary as shown on proposed Maps B4 and B7 to include the whole of Lindis catchment.	<ul style="list-style-type: none"> • Tarras has relied on Lindis water for past 90 years. The proposed boundary would have major social and economic impacts on the Tarras community. • There is no guarantee around being able to obtain water and appropriate easements from any alternative source. • Proposed mapping of the catchment boundaries fails to meet the purpose and principles of the RMA, which states the economic and social wellbeing of a community must be taken into account.

53 Tim Davis

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	Adopt some of these unique solutions as part of the management regime.	<ul style="list-style-type: none"> • A series of think tanks were undertaken between Fish and Game and the Lindis Catchment group where flow management solutions were talked about (including channel management, willow removal, gravel extraction, flushing flows, relocation of points of take, and transition arrangements). None of these provisions and transitions has been inserted into PPC5A. • ORC should look at all options to increase the values, not just a blunt instrument such as a minimum flow. • The Lindis catchment is one of the driest catchments in the country and needs a flow management regime that recognises this. • ORC has failed to take an approach that recognises the unique characteristics of the Lindis catchment and where every stakeholder can share in the improvements, and the costs are not borne by just the local community. • The proposed water management regime has not had a lot of input from the local community. • Real consultation took place during a series of think tanks between Fish and Game and the Lindis Catchment Group.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Insert a transition period to allow the catchment time to make necessary adjustments to their businesses, at the very least out to 2026.	No reason given.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Recommend a stepped flow of 450 l/s between October and May and also in events when the Lindis Peak flow recorder drops below 1,100 l/s drop the flow to 250 l/s.	<ul style="list-style-type: none"> • For many years the ORC had been recommending a minimum flow of 450 l/s. We have transferred the majority of our irrigation to efficient irrigation methods based on a minimum flow of 450 l/s. A minimum flow of 750 l/s puts this investment, along with the property, in serious jeopardy. • Pivots (efficient irrigation) and intermittent application do not combine well.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • The economic (financial) and social effects of the 750 l/s minimum flow at a farm level, catchment-wide, and to the wider community are huge and not well understood by ORC, while the benefits are minor, negligible, or in some cases negative. • External reports from Opus and Berl are inadequate and appear to have been written to defend an outcome rather than investigate the facts. The findings of the Berl economic analyses were both vague and uncalculated. • Storage in any large degree for the Lindis catchment is uneconomic. Other cheaper alternatives (such as a lower minimum flow) are available. • A stepped flow is desirable in dry years. • There has been a large focus on trout habitat and rearing, with very little on native species. Trout and native species, are not complementary, as any increase in trout is likely to have a detrimental effect on native species. • ORC have implied trout will be excluded by man-made barriers, but no work or consultation has been undertaken around the use of manmade trout barriers. • The river currently provides excellent trout habitat and rearing in the middle and upper reaches despite the lower reaches being in a less than desirable state. • The current state of the river with regards to water quality is very good. • The S32 Evaluation Report implies in an 'average' year economic losses will be minor. This is incorrect. • No analyses has been presented on economic losses in a dry year, the most important time for irrigation. • No evidence has been supplied to support the assertion that natural variability in the catchment has a bigger effect on reliability than the minimum flow. • The benefits of the minimum flow have been insufficiently qualified or quantified.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Recommend a primary allocation limit agreed between Lindis Catchment Group and ORC.	<ul style="list-style-type: none"> • A change in the point of takes, plus a reduction in demand from 2,700 l/s to somewhere in the vicinity of 1,500 l/s, will provide similar and possibly more benefits to the values of the river, at less costs for water users, than that of a draconian minimum flow. • The primary allocation limit should be raised to a level that allows all deemed permits to be renewed as per current rules around volume, efficiency and alternative sources.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Define the Lindis catchment as the geographic boundary.	<ul style="list-style-type: none"> • Splitting the catchment into two looks like a blatant attempt to justify demand assumptions, and to make the proposed primary allocation work for ORC's surety of supply graphs.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Properties that have historically been taking water from the Lindis River should be treated the same, regardless of whether they are in the Upper Lindis, Lower Lindis or the Tarras basin.

54 Fish and Game Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Add other objectives, policies, methods, rules, and schedules to the RPW, to address transitioning from deemed permits.	<ul style="list-style-type: none"> • Need to address the issue of transition from deemed permits to resource consents, regardless of water source. Transition matters include: <ol style="list-style-type: none"> a) Facilitating the shifting of deemed permits to resource consents from alternative sources; b) The potential for gravel management and extraction in locations where there are substantial deposits to restore surface flows; c) Changing methods of take to restore fish passage and prevent ingress of small fish and elvers; d) Providing for variable rates of take through consents to mimic flushing flows and to enable the fine-tuning of water management. e) Providing certainty and a process to facilitate the fair break-up and reallocation of large deemed permits held by existing irrigation companies into individual or smaller components. • The S32 Evaluation Report does not adequately address matters of transition. It only addresses transition times under RPW Policy 6.4.5. The topic of transition from deemed permits to resource consents is wider.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend the summer minimum flow to 1,000 l/s.	<ul style="list-style-type: none"> • The proposed summer minimum flow: <ol style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS, Otago's Conservation Management Strategy, the draft Otago Conservation Management Strategy and the Sports Fish and Gamebird Management Plan of Otago. • The proposed summer minimum flow of 750 l/s does not appropriately recognise the importance of environmental protection and an adequate minimum flow as a core element of sustainable management. • A substantial amount of new information has surfaced since the original flow proposals were created including: <ol style="list-style-type: none"> a) A better understanding of the catchment hydrology and water quality impacts; b) A better understanding of how the effects of natural climate

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>variability affect the existing security of supply for irrigators;</p> <p>c) A better understanding of fish behaviour, predation, and mortality during times of low flow in the lower river;</p> <p>d) New fisheries modelling techniques;</p> <p>e) New information on the availability and accessibility of alternative water sources and new developments in irrigation infrastructure. This information justifies a higher summer primary allocation minimum flow for the river.</p> <ul style="list-style-type: none"> • A minimum flow of 1,000 l/s promotes the sustainable management of the natural and physical resources in the region, complies with the RMA and gives effect to the NPSFM and the relevant regional policy documents. • The draft NESEFWL recommends the setting of minimum flows at no less than 80% of MALF for rivers with a mean flow of greater than 5,000 l/s. A flow of 1,000 l/s is 53% of MALF (which is substantially lower than many rivers in Otago) and will result in flows in the lower river reaches that are still 250-350 l/s below the point of inflection for juvenile brown trout in this river. • A minimum flow of 1,000 l/s recognises the dry nature of the catchment, existing land use, and the need for some surface water abstraction to continue for those who do not have access to an alternative supply. • A minimum flow of 1,000 l/s would be sufficient to maintain the natural character throughout the lower river reach. • The S32 Evaluation Report does not adequately examine the appropriateness of the minimum flow for achieving the objectives, or alternatives for achieving the objectives, nor does it appropriately recognise the importance of environmental protection and an adequate minimum flow as a core element of sustainable management.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend the summer minimum flow season from 1 October to 31 May to 1 October to 30 April.	<ul style="list-style-type: none"> • Trout and other freshwater fish require a higher flow in order to return to the river from the mainstem Clutha to spawn during the winter. • A winter minimum flow season beginning on 1 May is the often-used beginning date in Otago plans and resource consents for the beginning of the freshwater sports fish spawning season. • The proposed eight month summer low flow period risks a potential flat-line, with resultant detrimental effects on the river ecosystem, such as the growth of nuisance algae. • The proposed summer minimum flow (1 October to 31 May) of 750 l/s: <ul style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA,

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS, Otago's Conservation Management Strategy, the draft Otago Conservation Management Strategy and the Sports Fish and Gamebird Management Plan of Otago.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Amend	Amend the winter minimum flow season from 1 June to 30 September to 1 May to 30 September.	<ul style="list-style-type: none"> • Trout and other freshwater fish require a higher flow in order to return to the river from the mainstem Clutha to spawn during the winter. • A winter minimum flow season beginning on 1 May is the often-used beginning date in Otago plans and resource consents for the beginning of the freshwater sports fish spawning season. • The proposed eight month summer low flow period risks a potential flat-line, with resultant detrimental effects on the river ecosystem, such as the growth of nuisance algae. • The proposed winter minimum flow (1 June to 30 September) of 1,600 l/s: <ul style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS, Otago's Conservation Management Strategy, the draft Otago Conservation Management Strategy and the Sports Fish and Gamebird Management Plan of Otago.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Support the winter minimum flow of 1,600 l/s, conditionally.	Support for the winter minimum flow of 1,600 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	Support the primary allocation limit of 1,000 l/s, conditionally.	<ul style="list-style-type: none"> • The proposed primary allocation limit of 1,000 l/s is slightly higher than the default limit set by Policy 6.4.2 of the RPW. • Support for the primary allocation limit is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
16	Groundwater connected to Lindis River	Schedule 2C - Lindis Alluvial Ribbon Aquifer	Support	Support Schedule 2C.	No reason given.
33	Matters beyond the scope	Matters beyond the scope of the Plan Change	Not Applicable	Add "birddiv" to the list of values of the Central Otago subregion included in Water Plan Schedule 1A.	The presence of indigenous waterfowl and wading birds in the lower Lindis justifies this addition to Schedule 1A of the RPW.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Support the supplementary regime, conditionally.	<ul style="list-style-type: none"> • The proposed supplementary flows are more permissive than the default regime, but enable harvesting to occur to encourage irrigators to lessen their reliance on primary allocation from the Lindis.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Support for the supplementary regime is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Support	Support Maps B4 and B7.	No reason given.
37	Maximum allocation regime for the Bendigo-Tarras Basin	Schedule 4A - Maximum allocation limits	Support	Support Schedule 4A.	No reason given.
38	Restrictions for groundwater takes - other requests	Schedule 4B.2 - Restrictions on groundwater takes	Oppose	Oppose restriction on takes from the Bendigo and Lower Tarras Aquifers: "There shall be no take for irrigation purposes between 1 May and 31 August inclusive. Other restrictions may be imposed on resource consents to help maintain lake levels".	The existence of a resource consent to operate the Clutha/Mata-Au hydro scheme should not provide an open-ended and undefined ability for the RPW to place restrictions on water permits from these aquifers through Schedule 4B.2.

55 Federated Farmers - High Country

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Support	<ul style="list-style-type: none"> • Extend the policy completion date to 31 December 2030 so that all factors can be fully analysed and introduced to the optimum effect. • Enter meaningful and constructive negotiation with affected landholders and other stakeholders to formulate a policy as to how a summer minimum flow of 450 l/s can be best effected, bearing in mind, and clearly evaluating, the effects that any management regime will have on the community, the economy and the environment. 	<ul style="list-style-type: none"> • Landowners accept that some changes are desirable for the ongoing benefit of all river users and have made long-term business decisions and investments based on the information provided by ORC during the initial consultation process during which ORC held preference for a summer minimum flow of 450 l/s. • Current mining privileges expire in October 2021, but the NPSFM provides for variations to these to be made from that date, unless prior agreement is reached between the ORC and the permit holders. • The NPSFM provides for a progressive implementation programme whereby a Regional Freshwater Management policy is to be fully completed by 31 December 2025 or 31 December 2030 if "meeting that date (31/12/25) would result in lower quality planning". • Any implementation of the minimum flow prior to 31/12/2030 would result in lower quality planning insofar as it would lead to inefficient irrigation systems. • Implementing the minimum flow on 31/12/2030 would lessen the severe economic impact that the revised regime will have on many primary production businesses in the region and alleviate any adverse financial effect. • The consultation process that culminated in the final recommendation was not constructive. Constructive consultation did take place from 2009-2014, but many landholders would reject the suggestion that the meetings in 2015 could be described as "consultation". The abrupt ending of consultation by ORC in 2015

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>when reversing its long held preference for option 2 precluded any chance of achieving a proposal acceptable to the wider community.</p> <ul style="list-style-type: none"> • The S32 Evaluation Report is blatantly inadequate in many areas, offering some unsupported data to rationalise what appears to be a pre-conceived decision, rather than use data scientifically to reach a logical decision. It fails to meet the requirement to: <ul style="list-style-type: none"> a) Examine new proposals for their appropriateness in achieving the purpose of the RMA; b) Clearly identify and assess the benefits, costs and risks of new policies and rules on the community, the economy and the environment; and c) Document the analysis so stakeholders and decision-makers can understand the rationale for policy choices. • Many of the points raised in the S32 Evaluation Report are unsubstantiated and irrelevant, and data are used to give the impression of a minor adverse effect or to support a predetermined decision, rather than used scientifically to reach a logical decision.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt option 2, the summer minimum flow of 450 l/s at the existing Ardgour monitoring site.	<ul style="list-style-type: none"> • Accepts that the status quo is unsustainable. • The NPSFM requires ORC to address over-allocation and this can only be achieved through the implementation of some greater level of control. • Reconsideration of the listed costs and benefits of the considered options by the submitter results in changing the balance of the evaluation towards option 2 being the optimum choice. • Landholders are expected to carry the brunt of the changes, but, as a partial contributor to the problem, decision-makers have a moral responsibility to alleviate the burdens of any change as far as it is within their power. • Systemic failure in structuring the S32 analysis provides for considerable doubt about the resultant recommendation, the validity of the benefits of a 750 l/s summer minimum flow and the adequacy of the assessment of the economic costs associated with this option.

56 Lindis Catchment Group Inc

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	Include a package of provisions and amendments to existing provisions that provide a holistic approach to river management specifically tailored to the Lindis catchment.	<ul style="list-style-type: none"> • PPC5A fails to provide a holistic and robust river management regime which will enable effective management of in-stream low flow conditions. • ORC is relying on existing generic provisions of the RPW to manage the Lindis catchment during low flows. However, existing generic provisions have either been ineffective or have not been utilised to effectively manage low flow conditions in dynamic catchments such as the Lindis.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • An integrated and holistic approach is required for dynamic low flow environments such as the Lindis catchment. • Need for the inclusion of a range of river management options and tools which, in combination with the provisions (including the minimum flow regime) proposed by Lindis Catchment Group, would maintain and enhance the values associated with the river while managing low flows within an alluvial river system in a reliable and timely manner. • Failure to provide for a holistic river management regime results in PPC5A not achieving the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • The evaluation of the proposed plan change, including: <ol style="list-style-type: none"> a) The transition timeframes provided by Policy 6.4.5; b) The proposed minimum flow of 750 l/s (1 Oct to 31 May); c) The proposed primary allocation limit of 1,000 l/s; d) The proposed change to Rule 12.1.4.4 in combination with the proposed catchment boundary in Maps B4 and B7; and e) The restriction on taking water from the Bendigo and Lower Tarras aquifers, was not carried out in accordance with S32 of the RMA, including, but not limited to, a failure to: <ol style="list-style-type: none"> i. accurately assess the efficiency and effectiveness of the maps and associated provisions in achieving the RPW objectives. ii. accurately identify or assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the proposed changes. iii. identify and assess options for an effective transition period and process, and a range of potential river management options. • Insufficient justification is provided for the proposed primary allocation limit, and no account is taken in the S32 Evaluation Report or proposed provisions of how a primary allocation limit works in combination with a minimum flow to impact on water availability and reliability.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Amend Policy 6.4.5 so that implementation of the minimum flow on Lindis River will not occur before October 2026, or include a package of provisions and amendments to existing provisions that provide an effective and appropriate transition period and process for replacing deemed permits and water permits.	<ul style="list-style-type: none"> • Irrigators are required to make substantial changes to replace their deemed permits or RMA permits, and the existing provisions of the RPW, including increasing their efficiency of use. This requires significant changes to and investment in, irrigation and distribution systems both on- and off-farm, to adjust to the minimum flow and primary allocation regime. • The proposed change to Policy 6.4.5 and the failure to provide for a transition package results in PPC5A not achieving the purpose of the RMA and the objectives and policies of the RPS, PRPS and

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>RPW, and is inconsistent with the NPSFM.</p> <ul style="list-style-type: none"> • Inserting the Lindis catchment into Policy 6.4.5 will result in a lack of a feasible timeframe and clear process for irrigators to transition to new permits with conditions imposing a minimum flow regime and a new primary allocation limit. • The lack of a feasible transition period and process does not recognise the complexity and challenges of all of these changes and the significant economic effects on irrigators that will result from these changes. • An implementation date of no earlier than October 2026 for the minimum flow and primary allocation regime would enable irrigators to comply with a minimum flow regime in a coordinated, realistic and achievable manner. It would allow a range of other river management options and changes to irrigation systems to be considered and implemented which would maintain and enhance the values associated with the Lindis River. • The inclusion of longer timeframes is consistent with the NPSFM. • PPC5A does not include provisions that will allow for changes necessitated in farm management due to changed water availability and variability. • Development of a transition package of provisions (policies and rules) is needed to: <ul style="list-style-type: none"> a) recognise and reduce the complexity and challenges of all of these changes; b) minimise the adverse effects of these changes on irrigators; c) promote balanced betterment to the core values of the Lindis Catchment water; and d) provide a clear process, and appropriate timeframes, for an effective transition to new water permits with conditions imposing a minimum flow regime and new primary allocation limit.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to a minimum flow of 450 l/s (1 October to 31 May) with an implementation date of 2026.	<ul style="list-style-type: none"> • Irrigators are required to make substantial changes to replace their deemed permits or water permits under the RMA and the existing provisions of the RPW, including increasing their efficiency of use. This will require significant changes to and investment in, irrigation and distribution systems both on- and off-farm. • No feasible timeframe and clear process for irrigators to transition to new permits with conditions imposing a minimum flow regime and a new primary allocation limit. • The lack of a feasible transition period and process does not recognise the complexity and challenges of all of these changes and the significant economic effects on irrigators that will result from these changes.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • The proposed timeframe fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • An implementation date of no earlier than October 2026 for the minimum flow and primary allocation regime would enable irrigators to replace deemed permits and water permits, change their systems and comply with a minimum flow regime in a coordinated, realistic and achievable manner. It would allow a range of other river management options and changes to irrigation systems to be considered and implemented which would maintain and enhance the values associated with the Lindis River. • The inclusion of longer timeframes, as requested, is consistent with the NPSFM.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to a minimum flow of 450 l/s with an implementation date of 2026.	<ul style="list-style-type: none"> • Irrigators who will be subject to the proposed minimum flow would be significantly adversely affected socially and economically as a result of factors including reduced water availability and reliability of supply, and resultant challenges for all decisions about farming operations, including investment in more efficient irrigation systems. As a result, the community connected to the Lindis catchment area would also be significantly adversely affected socially and economically. • Flows in the Lindis River currently get as low as approximately 200 l/s at the Ardgoor Road monitoring site. • The setting of the proposed minimum flow of 750 l/s (1 October to 31 May) has not been informed by the best available information and scientific and socio-economic knowledge and fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • A minimum flow of 450 l/s from 1 October to 31 May (with an implementation date of no earlier than 2026) could enable people and communities to provide for their social and economic well-being while also achieving all other aspects of the purpose of the RMA, meeting the objectives and policies of the NPSFM, RPS, PRPS and RPW. • A minimum flow of 450 l/s from 1 October to 31 May (with an implementation date of no earlier than 2026) represents a significant improvement to the maintenance and enhancement of values associated with the Lindis when compared to the status quo.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Retain as proposed.	No reason given.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Amend to a primary allocation limit of 1,500 l/s.	<ul style="list-style-type: none"> • The proposed primary allocation limit does not represent historic water use within the catchment, and what could be irrigated

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>efficiently with this water.</p> <ul style="list-style-type: none"> • The current primary allocation is 4,003 l/s, of which approximately 2,700 l/s is used. • The proposed primary allocation limit will result in a harsh reduction in water availability and will result in significant adverse economic and social effects on irrigators and the community connected to the Lindis catchment. The economic and social effects of the proposed primary allocation limit will be exacerbated by a range of factors including the reduction in water available for irrigation due to the adoption of a minimum flow and potentially having to obtain water takes from an alternative source. • The setting of the proposed allocation limit of 1,000 l/s has not been informed by the best available information and scientific and socio-economic knowledge and fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • The amendment sought could enable people and communities to provide for their social and economic wellbeing while also achieving all other aspects of the purpose of the RMA, meeting the objectives and policies of the NPSFM, RPS, PRPS and RPW.
15	Ardgour Road Minimum Flow Monitoring Site	Schedule 2A and 2B - Monitoring site	Support	Retain as notified.	No reason given.
16	Groundwater connected to Lindis River	Schedule 2C - Lindis Alluvial Ribbon Aquifer	Support	Retain as proposed.	No reason given.
22	Mapping of the Lindis Alluvial Ribbon Aquifer	Map C-series: C5, C6 - Lindis Alluvial Ribbon, Ardgour Valley, Bendigo and Lower Tarras Aquifers	Support	Retain as proposed.	No reason given.
30	Implementation	Implementation - Other requests	Not Applicable	Include provisions that interlink the minimum flow effectively with the new primary allocation limit so that these tools can work as an integrated package.	No reason given.
33	Matters beyond the scope	Matters beyond the scope of the Plan Change	Not Applicable	Inclusion of new policies and rules granting primary allocation status to any take which has primary allocation status in relation to a tributary of the Clutha/Mata-Au (including the Lindis River and its tributaries) which is moved from that tributary of the Clutha/Mata-Au to the main stem of the Clutha/Mata-Au.	No reason given
35	Supplementary allocation regime (min flow and	Schedule 2B - Supplementary allocation	Support	Retain as proposed.	No reason given.

Ref	Issue allocation)	Provision regime	Position	Decision Requested	Reason for Decision Requested
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Redefine the catchment area and amend Maps B4 and B7 to include all of the true geographic area of the Lindis Catchment and retain the proposed changes to this rule.	<ul style="list-style-type: none"> • Rule 12.1.4 is opposed in so far as it is linked to Schedule 2A and the B-series maps which identify the Lindis Catchment. • The mapped catchment boundary does not recognise the true geographical catchment boundary. • Future decisions about sourcing water should not be limited or extinguished by an arbitrary approach to mapping. Creating an arbitrary boundary to exclude the Tarras Creek sub-catchment from a minimum flow is a very blunt instrument to achieve this. • The proposed boundary will result in significant adverse economic and social effects (including the lack of certainty and clarity about the implications of this catchment boundary, the time it will take to work through changing the location of takes and/or irrigation systems, and the associated economic and social costs of this, and the resulting inability or difficulty in making decisions about farm operations and investments). • Showing the true geographical extent to the Lindis catchment on Maps B4 and B7 would take away the uncertainty and complexities associated with the boundary as proposed by the ORC, and would enable irrigators to provide for their social and economic wellbeing. • Existing Policy 6.4.OC of the RPW should be applied to applications relating to water takes, rather than creating an arbitrary catchment boundary. • The effect of excluding part of the true geographic area of the Lindis Catchment from these maps, in combination with Rule 12.1.4.4, means that irrigators who take water from within the mapped catchment area shown on Maps B4 and B7 may not then 'use' it in the excluded area pursuant to this rule. This creates uncertainty and unnecessary complexity for applicants wanting to take and/or use water in the Tarras Creek area, as they may be treated differently from other users with existing primary allocation water rights from the Lindis catchment, without sufficient justification. • When combined with the proposed maps in B4 and B7, the proposed change to Rule 12.1.4.4 fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM.
38	Restrictions for groundwater takes - other requests	Schedule 4B.2 - Restrictions on groundwater takes	Oppose	Remove/delete this restriction on takes from the Lower Tarras and Bendigo Aquifers.	<ul style="list-style-type: none"> • The proposed restriction on taking water from these aquifers during winter is not based on the best available information and scientific and socio-economic knowledge (e.g. sufficient evidence that these takes might have a discernible impact on lake levels or lake outflows). • Winter takes are important to assist with frost fighting and with

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>water harvesting for irrigation storage.</p> <ul style="list-style-type: none"> • Primary allocation takes from the Lindis catchment have existed long before the relevant hydro-electricity generation dams, and have an imperceptible impact on lake levels and outflows. • The proposed restriction on takes from these aquifers will not achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM.

57 Federated Farmers of New Zealand

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	That full consideration of the community's identified values is provided for, specifically those relating to farming and irrigation where, to date, present and future impacts have not been appropriately considered or evaluated.	<ul style="list-style-type: none"> • There has not been any meaningful or constructive engagement and consultation with landowners regarding an appropriate minimum flow or the primary allocation limit. • Farming viability and the local economy were identified as primary considerations through community discussions. • The compulsory values ('ecosystem health' and 'human health for recreation') recognised by the NPSFM should not be prioritised above any other values that are considered relevant at a regional or local level. • When considering the range of values it is appropriate that focus turns to where the costs and risks lie, where opportunities will be lost and where the most pain will be. Landowners will be the ones who suffer the most under any minimum flow process. We do not consider this has been adequately reflected by ORC. • ORC has not met its planning responsibilities for the following reasons: <ul style="list-style-type: none"> a) Under the requirements of the RMA and NPSFM and the objectives of the RPW, ORC has the responsibility to provide for a fair, reasonable management regime and must ensure an appropriate balance between competing demands. b) When water is allocated, the social, economic and cultural values associated with particular water bodies must be balanced both with each other and with environmental values. c) The rights of existing users must be allowed for when setting environmental flow and water management regimes, in order to both protect existing infrastructure and investment, and to safeguard productive capacity.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Adopt an appropriate transitioning framework for the Lindis Catchment, enabling an extension of minimum flows for 5 years post expiry of deemed permits (mining privileges).	<ul style="list-style-type: none"> • Does not accept that the minimum flow should be immediately complied with upon the expiry of deemed permits in October 2021. • In complex situations like the Lindis, where the ability to access irrigation is already restricted by the environment, competing values exist, uncertainty remains about alternative options and the river itself is not clearly understood, a greater transitioning period will be

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>required.</p> <ul style="list-style-type: none"> • Under the NPSFM full implementation is required by 31 December 2025, or by 2030 if the 2025 timeframe will affect plan quality or is impracticable to fully implement by 2025. • Upon the expiry of mining right deemed permits, at least an additional five years is required to enable various processes. For example, transition to new sources or new points of take, investigating the feasibility of measures that mitigate the effects of the minimum flow on water availability, establishment of a catchment-wide water management group, the adoption and investment into more efficient irrigation practices. • The need for greater transition timeframes is reinforced through ORC's decisions to notify a 750 l/s minimum flow instead of the previously considered 450 l/s minimum flow proposal, because landowners have effectively lost 6 years of repositioning their current water usage.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	<p>That under Schedule 2A, for the Lindis River Catchment, a primary allocation minimum flow is adopted as follows:</p> <ul style="list-style-type: none"> • 450 l/s October to May • 1,600 l/s June to September. 	<ul style="list-style-type: none"> • Prior to April 2015, all ORC documentation, presentations, workshop commitments and scientific reports were prefaced around a primary allocation minimum flow of 450 l/s being required. • Based upon the evaluation of the April 2014 Consultation Draft S32 Report a minimum flow of 450 l/s should still be considered appropriate. • Following over 5 years of advice and information that the catchment required a minimum flow of 450 l/s, landowners invested to adapt practices and invest in infrastructure and technologies in an endeavour to meet the proposed flows. • Through changing the recommended minimum flow from 450 l/s to 750 l/s, ORC has stymied any opportunity for landowners to continue their existing businesses. • To be in line with ORC's own science, reports and evaluations over a 7-year period.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	<ul style="list-style-type: none"> • Adopt a more workable and appropriate primary allocation limit of 1,500 l/s. • If this is rejected, undertake meaningful and constructive engagement with landowners to determine the appropriate primary allocation limit. 	<ul style="list-style-type: none"> • A primary allocation limit of 1,000 l/s will result in a harsh reduction in water availability and significant adverse economic and social effects. • A primary allocation limit of 1,000 l/s does not represent the history of use within the catchment; neither does it appropriately represent what could be irrigated efficiently with this water. • No assessment of how the proposed primary allocation limit has been linked to the minimum flow, and how these will effectively work 'together'. • A primary allocation limit of 1,500 l/s is more appropriate and could more effectively enable people and communities to provide for their social and economic well-being while enabling

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					environmental objectives to be met.
22	Mapping of the Lindis Alluvial Ribbon Aquifer	Map C-series: C5, C6 - Lindis Alluvial Ribbon, Ardour Valley, Bendigo and Lower Tarras Aquifers	Amend	Retain existing mapping boundaries of the Lindis Alluvial Ribbon Aquifer.	Retaining the existing boundaries of the Lindis alluvial ribbon will appropriately ensure that there is no restriction on groundwater takes in the lower Lindis alluvial fan zone which isn't located within 100 m of the Lindis River.
27	Section 32	Section 32 Report	Not Applicable	That the Section 32 Evaluation Report is considered inadequate.	<ul style="list-style-type: none"> • The S32 Evaluation Report is neither appropriate nor adequate. It is simply 'reporting' on pre-determined decisions without any sufficient evaluation. • There has not been adequate identification or documentation of how conclusions within the evaluation report were reached and on what basis they were made. • Statements in the S32 Evaluation Report are contradictory to the April 2014 Consultation Draft S32 Report and ORC's own evidence, previous comments, statements and science. • The analysis in the S32 Evaluation Report has neither been substantiated nor linked adequately to any additional reports. • S32 Evaluation Report does not enable a full understanding of the likely benefits, costs or risks of different options. • The economic impacts of the minimum flow options (on individual landowners, the community and regional economies have not been adequately considered or have been significantly underestimated. The marginal economic impacts between the various options require significantly greater assessment, particularly in terms of the marginal economic opportunity costs between the minimum flow options considered. • The economic benefits resulting from each minimum flow option are not adequately considered. • No discussion or analysis within the S32 Evaluation Report as to how the primary allocation limit of 1,000 l/s was reached.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Include the Tarras Creek catchment in the mapped boundary of the Lindis catchment as shown on proposed maps B4 and B7 and retain existing boundaries of the Lindis Alluvial Ribbon Aquifer.	<ul style="list-style-type: none"> • To more appropriately reflect the reality that the Tarras Creek sub-catchment is an integral part of the overall Lindis River catchment. • The proposed map creates uncertainty and unnecessary complexity for applicants wanting to take and/or use water in the Tarras Creek area, as they will potentially be treated differently from other users with existing primary allocation water rights from the Lindis catchment, without sufficient justification.
38	Restrictions for groundwater takes - other requests	Schedule 4B.2 - Restrictions on groundwater takes	Amend	Delete reference to the Bendigo and Lower Tarras Aquifers from Schedule 4B.2.	<ul style="list-style-type: none"> • Most winter takes from these aquifers have long preceded hydro-electricity in this area. • Any resource consent concerns are more appropriately addressed on a case-by-case basis, on the facts of each case, as part of resource consent condition considerations. • Not consistent with other aspects of the RPW (including the policy framework in Chapter 6, particularly Policy 6.4.1).

58 Michael and Felicity Hayman

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Provide a longer timeframe before change is implemented	No reason given.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Provide a minimum flow of 450 l/s.	<ul style="list-style-type: none"> The proposed very high minimum flow will result in an unreliable water supply. Proposed development of our property requires capital expenditure which is only viable with a reliable water supply. A minimum flow level of 450 l/s would result in a more reliable water supply while leaving an adequate flow of water in the Lindis River.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Provide a primary allocation of 1,500 l/s.	Proposed development of our property requires capital expenditure which is only viable with a reliable water supply.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Use geographic maps instead of the proposed maps B4 and B7.	No reason given.

59 Justin and Tui Wilson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Increase the time in which the minimum flow will be implemented until 2026.	<ul style="list-style-type: none"> Introducing a minimum flow has huge repercussions for economic viability of farms reliant on Lindis water for irrigation. Landholders need time to build costly infrastructure to alleviate times of low flow.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Go back to the original proposal of 450 l/s.	<ul style="list-style-type: none"> At present the minimum flow is 200 l/s so there would be 250 l/s no longer used for irrigation. The Lindis is alive and well all year round from the upper Ardour bridge where we can all enjoy swimming, fishing and kayaking.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Retain the status quo for the boundary of the Lindis catchment.	All farm-workers contribute to the vibrant local environment and economy, and they rely on Tarras, Ardour and Lindis Valley landholders utilising Lindis water to provide employment opportunities.

60 Gordon Lucas

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Operative flow time should be extended to 2025 at least.	Huge changes for all will take time to bed in.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Support Lindis Catchment Group request for 450 l/s.	<ul style="list-style-type: none"> At a 750 l/s minimum flow there are too many days of water rationing, making it uneconomic to put in spray irrigators. A 750 l/s minimum flow would make it uneconomic to invest in expensive spray irrigation as there would be too many days of no watering. At a 450 l/s minimum flow, with careful management of restrictions, there would be much more confidence to invest in

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>efficient irrigation systems. Submitter has already invested a huge amount in pivot irrigation, for guaranteeing good winter feed crops, which has made a huge difference for the property and those who live and work here. A 450 l/s minimum flow would provide for reliable water to grow winter feed.</p> <ul style="list-style-type: none"> • Reliable water is needed to farm economically, as farmers are at the bottom of the heap in paying costs for pest and weed control, district and regional council rates and many more bureaucratic costs. • Autumn store price for finished lambs doesn't pay for the above costs, but reliable water produces better prices. • "Customary rights" must also apply to the farming generations over 100+ years, and others will have bought land in the knowledge there was a water right with it. • There are many lows and some highs in the commodity market and very dry and extreme dry years. Shudders to think of future generations facing poor prices and dry conditions, and watching Lindis water flowing out to the Clutha, gone for good, for a few introduced species of fish. This would not be good for farmers' mental health or the health of the wider community.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Increase primary allocation limit to 1,500 l/s.	To better represent primary water access.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Use the geographic catchment for the mapping of the Lindis Catchment in the B-series of the Water Plan Maps.	Map as proposed divides the community which is unfair on non-farming Tarras residents.

61 Lesley Lucas

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Time frame needs to be longer.	<ul style="list-style-type: none"> • A lot of change requires time. • Small blocks need water and houses need new setups for water access.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Support the summer minimum flow of 450 l/s.	<ul style="list-style-type: none"> • Allows 250 l/s above the present 200 l/s "minimum flow". • A minimum flow of 750 l/s will provide hardship for many users of the Lindis. • For peace of mind for farmers to guarantee crops in this low rainfall area. • Submitter retired blocks of sunny country, under an Otago Catchment Board farm plan, for vegetation regeneration with oversowing and top-dressing, which vastly improved water retention. • Guaranteed water for irrigation diminishes risks and gives economic peace of mind. Good land management makes for a stronger economic unit, allows pest and weed control, and provides employment, to strengthen the Tarras community.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Access to a reliable small amount of water is a vital part of our overall extensive high country farming practice. • A monitored 450 l/s minimum flow is adequate to provide recreational use, good fish habitat and maintain a healthy Lindis River that all can enjoy. • More than half of Tarras residents are connected with farming activities or rely on Lindis river water for domestic or gardens.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Provide a more reasonable allocation of 1,500 l/s.	Allows more primary water access.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Stick with Tarras area as a whole in the B-series of the Water Plan Maps.	To be fairer. Division is unfair on those excluded from the Lindis catchment.

62 Wanaka Agricultural Contracting

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Support the Lindis Catchment Group's recommendation (submitter 56) on minimum flows.	Supports the Lindis Catchment Group's decision requests for minimum flow, for job security and long term expansion within the industry.

63 New Zealand Professional Fishing Guides Association

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Improved summer minimum flow of at least 1,000 l/s.	<ul style="list-style-type: none"> • Submitters use the river when flows are maintained to the Clutha River but when flows are low, the river becomes unusable and an unsustainable habitat for the fish in the Lindis River. • The Lindis River has been mismanaged flow-wise for many years. • Consider the Lindis River to have good potential as a fishery if the flow regime is sustainable. • Guided fishing is worth approximately \$1,200/day to the region. The river has the potential to keep more guided days within the Otago Region.

64 Donald Wallace

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Support the option of 1,000 l/s.	<ul style="list-style-type: none"> • Appalled at the lack of water in the lower river over summer months for 50+ years, attributable to excessive irrigation. • The deadline of 2021 for alternatives for irrigation needs has been known for 30 years. • Need to return to a sustainable summer flow, with good water quality, cooler temperatures, restore natural character and support fish.

65 Royal Forest and Bird Protection Society of New Zealand Inc.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to 1,000 l/s, and the season to be 1 October to 30 April.	Proposed minimum flow: a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy. • The S32 Evaluation Report does not adequately examine the appropriateness of the minimum flow for achieving the objectives, or alternatives for achieving the objectives, nor does it appropriately recognise the importance of environmental protection and an adequate minimum flow as a core element of sustainable management.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Amend the winter minimum flow season from 1 June - 30 September to 1 May - 30 September.	Proposed minimum flow: a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Conditional support.	Support for the winter minimum flow of 1,600 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	Conditional support.	Support for the primary allocation limit of 1,000 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
26	Minor and consequential	Minor and consequential changes	Amend	Provide any minor or consequential relief that arises from relief sought.	No reason given.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Conditional support.	Support for the supplementary regime is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.

66 J. Murray Neilson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Confirm provisions, other than primary irrigation season minimum flow, as drafted.	• ORC must set an environmental flow for the Lindis which meets NPSFM objectives, in particular B1, B2 and B3. • ORC <u>must</u> provide for the compulsory values, <u>may</u> provide for other national values or other values, <u>while</u> considering impacts on local communities and people (emphasis added). Addressing environmental matters and over-allocation come first; everything else is secondary but can be provided for <u>while</u> meeting those

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	Adopt the submission of the Otago Fish and Game Council (submitter 54) in its entirety.	objectives. Submitter agrees with submissions (of Fish & Game) and adopts them in their entirety.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	The minimum flow at the Ardgour Road flow recorder should be 1,000 l/s, or higher, from 1 October to 30 April.	<ul style="list-style-type: none"> • ORC must set an environmental flow for the Lindis which meets NPSFM objectives, in particular B1, B2 and B3. • ORC <u>must</u> provide for the compulsory values, <u>may</u> provide for other national values or other values, <u>while</u> considering impacts on local communities and people (emphasis added). Addressing environmental matters and over-allocation come first; everything else is secondary but can be provided for <u>while</u> meeting those objectives. • For the life-supporting capacity of the lower Lindis and its braided natural character, a continuous flow is required. • The Opus reports notes that the demand for large volumes of irrigation water quickly exceeds the capacity of the low flow regime, irrespective of the level of the minimum flow, with the potential effects of a minimum flow of 900 l/s being generally not very different from those at 450 l/s. • The Section 32 Evaluation Report states that natural fluctuation in environmental conditions cause a greater impact on water availability than the <u>proposed</u> minimum flow, but submitter argues this would be true for any minimum flow from 450 l/s to 900 l/s. • Combined expert opinion behind a draft NESEFWL recommended a minimum flow of 80% MALF. A minimum flow of 1,000 l/s is less than this expert recommendation but recognises the use of water for irrigation where there is no alternative source, while providing for natural character, nesting birds and connection with the Clutha/Mata-Au.

67 Brian Turner

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Ensure more than adequate flow throughout the catchment, throughout the year, to guarantee good water quality, enhance the natural character and values, provide for recreational users and for healthy populations of fish, and so on.	<ul style="list-style-type: none"> • The recommended minimum flow is too low. • Irrigators continue to be pandered to, while they have had years of opportunity to provide for available and accessible alternative water sources. • Water should not continue to be treated principally as a utility/resource dominated by commercial interests, but as an essential part of the living community of nature. • Council has a duty to set measures to reverse the situation

68 Central Otago Environmental Society Inc.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Support	Do not compromise on or delay the issue of a minimum flow.	The availability of alternative water sources for irrigation and the fact that the end of a permissive regime has been well-signalled for a number of years, supports submitter's view that nothing be allowed to impede or delay the process of restoring the Lindis River.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt a minimum flow of 1,500 l/s (October to May) being 80% of MALF as proposed by the Draft NESFSWL.	<ul style="list-style-type: none"> • The ORC's declared objective is to maintain and enhance the quality of the Region's water resources. It follows that where potential risk is identified or doubt as to the outcome is identified, prudence should prevail. With regard to the Lindis, the minimum flow must be established at a level which ensures positive environmental outcomes. • Opposes 750 l/s because: <ul style="list-style-type: none"> a) Of uncertainty as to whether water quality will be improved; b) It puts at risk in-stream values below the SH8 bridge; c) It fails to provide fish habitat downstream from the SH8 bridge; d) It reflects an unnecessary concession to present land use practices. • The economic impact of a higher minimum flow is likely to be minimal (5% +/-) and will further encourage land use change and the implementation of sustainable agricultural practices, all developments which are legitimate and desirable outcomes. • Acknowledges the necessity to provide water for food production, supports the concept of water storage against dry years and advocates the development and implementation of sustainable, ecosystem-based farming practices which address environmental threats and improve the overall quality of the environment.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Support the winter minimum flow.	Welcomes the establishment of minimum flows and maximum allocations on the Lindis River as a potential exemplar which might be used to reinstate year-round flows in other Otago streams and tributaries which, in drought years, are diverted to maintain farm irrigation supplies.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	Support the primary allocation limit.	Welcomes the establishment of minimum flows and maximum allocations on the Lindis River as a potential exemplar which might be used to reinstate year-round flows in other Otago streams and tributaries which, in drought years, are diverted to maintain farm irrigation supplies.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Support the supplementary allocation regime.	Welcomes the establishment of minimum flows and maximum allocations on the Lindis River as a potential exemplar which might be used to reinstate year-round flows in other Otago streams and tributaries which, in drought years, are diverted to maintain farm irrigation supplies.

69 Beau Trevathan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Oppose	Specific provisions of PPC5A are opposed or requested to be amended.	<p>PPC5A is inconsistent with RMA, ORC Plans and National Policy Statements, and:</p> <ul style="list-style-type: none"> a) will not achieve the purpose of the RMA as it will not enable people and communities to provide for their social and economic wellbeing. b) will not achieve the objectives and policies of the RPS, PRPS and RPW. c) are based on an evaluation that was not carried out in accordance with S32 of the RMA d) are inconsistent with the NPSFM, which: <ul style="list-style-type: none"> - supports reasonable adjustment timeframes that take into account the economic effects likely to result from a change in approach to managing a freshwater resource; and - requires freshwater management to be informed by the best available information and scientific and socio-economic knowledge.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Include a longer transition period to 2026 instead of 2021.	<ul style="list-style-type: none"> • Including the Lindis catchment in Policy 6.4.5(c) means the existing timeframes outlined in the explanation to the policy would apply to the Lindis catchment. This will result in a lack of a feasible transition period for irrigators to adjust to the minimum flow regime and primary allocation limit, change to more efficient irrigation systems and potentially transfer water rights to an alternative source. • There is no exact science that can be used to know how the river will react to relocation of water takes. The effects of proposals from Lindis Catchment Group need time to realise their effects.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to a lower minimum flow during 1 October to 31 May.	<ul style="list-style-type: none"> • Irrigators who will be subject to the proposed minimum flow would be significantly adversely affected socially and economically, including for the following reasons: • The amendment sought (setting a lower minimum flow in Schedule 2A for 1 Oct to 31 May) would enable people and communities to provide for their social and economic well-being while also meeting all legislative requirements focusing on protecting natural and iwi values. • A minimum flow of 750 l/s will create uncertainty in economic use of small properties and over-capitalising and operating costs exceeding the value of returns which will lead to land use changes away from a form that supports the region's economy.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Amend to a higher primary allocation limit.	<ul style="list-style-type: none"> • The proposed primary allocation limit will result in reduced water availability and does not accurately represent the history of use within the catchment, and what could be irrigated efficiently with this water. • The amendment sought (a higher primary allocation limit) would

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					enable people and communities to provide for their social and economic well-being while also meeting all legislative requirements focused on protecting natural and iwi values.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	<ul style="list-style-type: none"> • Support Rule 12.1.4 insofar as it links to maps. • Redefine the catchment area to include the full extent of the true geographic boundary of the Lindis catchment and exclude the Tarras Creek area from the minimum flow through a policy/rule linked to a mapped sub-area. 	<ul style="list-style-type: none"> • Rule 12.1.4 is linked to the B-series maps which identify the Lindis Catchment. • Part of the true geographic area of the Lindis Catchment is excluded from B-series maps (the Tarras sub-catchment). This creates uncertainty for irrigators in the area that has been excluded from the Lindis catchment. • Maps B4 and B7 should not be amended as proposed, as they offer support to the original priority. Taking water to establish and sustain livelihood on small subdivisions in the Ardgour Valley in 1914 was given a priority ahead of any water taken to be delivered to the larger titles in the Tarras sub-catchment several years later. • The catchment boundary does not recognise the true geographical catchment boundary of the Lindis River. This will result in unnecessary complexity and uncertainty. • The proposed boundary will result in significant adverse economic and social effect. • Creating an arbitrary boundary for the catchment to exclude the Tarras Creek catchment (see p 11 of S32 report) from a minimum flow is a very blunt instrument to achieve this. • Submitter suggests the inclusion of a policy and rule which would exclude this area from the proposed minimum flow. This policy and rule could be linked to the Tarras Creek sub-catchment, as a mapped area within the wider Lindis Catchment.

70 Department of Conservation

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Retain as notified.	<ul style="list-style-type: none"> • Support proposed minimum flows and allocation limit for the Lindis. • Consistent with purposes and principles of the RMA. These provisions give effect to Part 2 of RMA, NPSFM and RPS, Policies 7(a) & (d) of the Conservation General Policy (2005), and to the Otago Conservation Management Strategy. • These will safeguard the life-supporting capacity of Lindis aquatic resources and sustain its fishery values. • Submitter supports initiatives to improve flows in the Lindis River catchment especially during the drier months of the year. Achieving more consistent flow and connection to the Clutha River is considered to be important for fish passage and the ecosystem health of the lower catchment generally. • Longfin eel, and common and upland bully are present in the

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					Lindis main stem, and the “Nationally Critical” status Clutha flathead galaxias is restricted to tributaries often above barriers to trout predation and competition.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Support	Retain as notified.	Policy 6.4.5 enables a RMA provision link to give effect to and implement the Chapter 12 rules of the RPW under RMA S67(1).
26	Minor and consequential	Minor and consequential changes	Amend	Make further or alternative relief to like effect to that sought.	Alternative wording of like effect may be equally acceptable.
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Retain as notified.	<ul style="list-style-type: none"> • Support proposed minimum flows and allocation limit for first and second supplementary blocks for the Lindis. • These will safeguard the life-supporting capacity of Lindis aquatic resources and sustain its fishery values.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Support	Retain as notified.	<ul style="list-style-type: none"> • Support addition of Lindis catchment to Rule 12.1.4.4. • Addition of Lindis catchment to Rule 12.1.4.4 is required to implement proposed Policy 6.4.5(c) of the RPW.

71 Lynne McCall

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt a minimum flow of 450 l/s.	Community relies on farmers. Without sufficient water for irrigation, farming will not prosper, nor will employment in the area.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Adopt a primary allocation of 1,500 l/s.	There is a lack of meaningful consideration of economic and social effects on the district.

72 Geordie Hill Station Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Delay the imposition of the minimum flow, and formulate provisions for transition from deemed permits and water permits, and put clear processes in place to facilitate this.	<ul style="list-style-type: none"> • Changes required on farms are substantial. Reconfiguring irrigation infrastructure is a long term project, so farmers need a clear logical pathway and framework of rules and policies. Required on-farm changes need to take place before new requirements are imposed. ORC may not fully understand the magnitude of these changes. • Submitter has made significant on-going investment in modern spray irrigation as it is vital to finish own stock on quality pastures. Forcing farm into water storage or expensive alternatives can devastate current production economics, and will force farms into less environmentally-light operations. ORC has not properly considered that water policy is aligned to making a living from traditional sheep and beef land use. • Submitter wishes for similar availability of vital water that has sustained four generations of family on a farm that is an important part of the Tarras economy and social fabric.
6	Irrigation season primary	Schedule 2A - 1 Oct to 31	Amend	Adopt a minimum flow of 450 l/s (1 Oct	• A minimum flow of 750 l/s takes away too much reliable irrigation

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	allocation minimum flow 750 l/s	May minimum flow for primary allocation		to 31 May).	<p>water.</p> <ul style="list-style-type: none"> • The farmer and community would bear significant economic and social consequences that are out of proportion to the benefits of the higher minimum flow. • The proposed minimum flow fails to achieve the purpose of the RMA, RPS and plans. • ORC has failed to properly and accurately carry out an evaluation of the proposal in accordance with RMA S32. • Concerned at lack of consideration and respect shown by ORC during consultation, for local opinions, heritage and social/economic values, while too much weight has been given to the opinions of those from outside the area, who do not share the locals' history. • Locals bear the harsh direct impact of proposed PPC5A. • For a significant period, locals were led to believe the minimum flow would be 450 l/s, and found out later by chance the ORC had other thoughts.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Primary allocation should be 1,500 l/s.	<ul style="list-style-type: none"> • A primary allocation limit of 1,000 l/s is too little water in relation to the land which is currently irrigated. • Tarras has a long history of irrigation and its community need to retain that basis. • Both the primary allocation and the minimum flow determine availability of reliable irrigation water. Lindis provides economic and traditional water to sustain traditional sheep and beef farming.

73 Forest Range Ltd, R.S. Emmerson Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Increase the time frame in which the minimum flow will be implemented until 2016.	Gives affected farmers maximum opportunity to redesign their farming operations. Restrictions that benefit the wider community are at the farmer's expense, so ORC should assist during this transition period.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt the original proposal for 450 l/s flow.	<ul style="list-style-type: none"> • Present minimum flow is 200 l/s, so 450 l/s would allow another 250 l/s that is no longer used by irrigation. • Lindis River is in good heart and there is no evidence it would naturally flow to the Clutha/Mata-Au. • Many of the Lindis' tributaries often run underground with sufficient water in their upper catchments supplying the Lindis. • Significant investment has been made in conservation measures. This should give submitter some right to irrigate from Lindis. • Fish life abounds and spawning trout are often seen in the upper catchment. Fish numbers are affected by predatory birds. • Providing a habitat for introduced fish should not take precedence over the financial stability of the district.
8	Primary allocation limit of	Schedule 2A - Primary	Amend	Increase primary allocation limit to	A primary allocation limit of 1,500 l/s aligns more accurately with

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	1,000 l/s	allocation limit		1,500 l/s.	current primary allocation.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Leave the original catchment boundary unchanged.	Proposed map has no logic, as the area is one agricultural industry economically.

74 Forest Range Ltd, Lindis Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Increase the time frame in which the minimum flow will be implemented until 2016.	Gives affected farmers maximum opportunity to redesign their farming operations. Restrictions that benefit the wider community are at the farmer's expense, so ORC should assist during this transition period.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Adopt the original proposal for 450 l/s flow.	<ul style="list-style-type: none"> • Present minimum flow is 200 l/s, so 450 l/s would allow another 250 l/s that is no longer used by irrigation. • Lindis River is in good heart and there is no evidence it would naturally flow to the Clutha/Mata-Au. • Many of the Lindis' tributaries often run underground with sufficient water in their upper catchments supplying the Lindis. • Significant investment has been made in conservation measures. This should give submitter some right to irrigate from Lindis. • Fish life abounds and spawning trout are often seen in the upper catchment. Fish numbers are affected by predatory birds. • Providing a habitat for introduced fish should not take precedence over the financial stability of the district.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Increase primary allocation limit to 1,500 l/s.	A primary allocation limit of 1,500 l/s aligns more accurately with the current primary allocation.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Leave the original catchment boundary unchanged.	Proposed map has no logic, as the area is one agricultural industry economically.

75 Gregor McKenzie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Minimum flow of at least 1,000 l/s, at Ardgor Road flow recorder.	<ul style="list-style-type: none"> • A minimum flow of 1,000 l/s ensures a meaningful flow in the lower river, good water quality, cooler temperatures, restore the natural character, amenity and fishery values. • A minimum flow of 1,000 l/s 1,000 l/s represents a considerable concession to irrigators, given the draft NESEFWL recommends a minimum flow of 80% of MALF for this size of river. • Alternative water sources are available, and are being invested in, because the RPW is clear that any alternative source should be used in over-allocated catchments.

76 Contact Energy Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general	Support	Support the approach to managing	• Lack of precipitation can result in Lindis running dry, coinciding

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		support		allocation in a dry and over-allocated catchments Support PPC5A and in particular: • Managing and protecting water bodies, including aquifers, from over-allocation, and • Promoting the efficient and sustainable use of water resources.	with greatest irrigation demand. • 1,600 l/s at Lindis Peak reduces to 177 l/s at Ardour Road, due to takes between the two sites. • Catchment is severely over-allocated with over 4,000 l/s consented take.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Support	Retain Policy 6.4.5 as notified.	It is understood that the minimum flow and allocation regime will apply to any new consents granted but will only apply to existing permits after a collective review of the consents in the catchment. Such a review may occur at or prior to the expiry of deemed permits in 2021.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend Schedule 2A as follows: (struckthrough text indicates text to be deleted; underlined text indicates text to be added): Minimum flow (litres per second - instantaneous flow): 750 (1 October <u>September</u> to 340 May <u>April</u>)	Suggested amendment to the summer flow period should reflect the recognised irrigation demand periods (as reflected in recent resource consent conditions and Schedule 4B.2).
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Amend	Amend Schedule 2A as follows: (struckthrough text indicates text to be deleted; underlined text indicates text to be added): Minimum flow (litres per second - instantaneous flow): 1,600 (1 June <u>May</u> to 301 September <u>August</u>).	Suggested amendment to the winter flow period should reflect the recognised irrigation demand periods (as reflected in recent resource consent conditions and Schedule 4B.2).
16	Groundwater connected to Lindis River	Schedule 2C - Lindis Alluvial Ribbon Aquifer	Support	Retain Schedule 2C as notified.	Supports Schedule 2C and the inclusion of the Lindis Alluvial Ribbon Aquifer in this Schedule.
26	Minor and consequential	Minor and consequential changes	Amend	Any other consequential changes required to give effect to the relief sought.	No reason given.
33	Matters beyond the scope	Matters beyond the scope of the Plan Change	Not Applicable	Provide for transparency and understanding of the level of ongoing allocation in the Lindis River and associated aquifers by publicly notifying such information.	• In the interests of the community of water users and ORC it would be useful if all parties were able to understand the level of allocation available. • Transparency could be achieved by publishing allocation levels on, for example, the ORC's internet site (which is able to be updated regularly) or by public notice from time to time
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Amend	Amend Schedule 2B as follows: (struckthrough text indicates text to be deleted; underlined text indicates text to be added): <u>1</u> May to <u>30</u> November: 2200 Ardour	So that the dates are specific.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Road (MS 17) 1 December to 30 April: 1600 Ardgour Road (MS 17) 1 May to 30 November: 2700 Ardgour Road (MS 17) 1 December to 30 April: 2100 Ardgour Road (MS 17)	
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Support	Retain Rule 12.1.4.4 as notified.	It is understood that the minimum flow and allocation regime will apply to any new consents granted but will only apply to existing permits after a collective review of the consents in the catchment. Such a review may occur at or prior to the expiry of deemed permits in 2021.
37	Maximum allocation regime for the Bendigo-Tarras Basin	Schedule 4A - Maximum allocation limits	Support	Retain Schedule 4A as notified.	Supports the inclusion of the three relevant aquifers: the Ardgour Valley Aquifer, the Bendigo Aquifer and the Lower Tarras Aquifer. These values are 50% of the calculated maximum extraction, according to the 2010 Bendigo and Tarras Groundwater Allocation Study.
38	Restrictions for groundwater takes - other requests	Schedule 4B.2 - Restrictions on groundwater takes	Amend	Amend Schedule 4B.2 by the addition of the Ardgour Valley Aquifer and the Lindis Alluvial Ribbon Aquifer (with appropriate map references).	<ul style="list-style-type: none"> • For aquifers having a hydraulic connection to the Clutha River it is appropriate to place restrictions on new consumptive takes during the winter months when water is of maximum value for hydro-electric generation. The Lindis Alluvial Ribbon Aquifer and the Ardgour Valley Aquifer should be added to Schedule 4B.2 as both are hydraulically connected to Lake Dunstan and the main stem of the Clutha/Mata-au above Lake Dunstan. It does not make sense to exclude seasonal restrictions from these aquifers if efficient use of water is to be maximised and the objective of 4B.2, to help maintain lake levels, is to be met. • Recently granted resource consents have such restrictions as conditions to provide a degree of protection to the operation of Lake Dunstan and Contact's hydroelectric operations. These conditions provide for maximum efficiency in the use of water: for irrigation during spring and summer when it is in demand; for electricity generation during autumn and winter when it is in demand. • The Lindis Alluvial Ribbon Aquifer and the Ardgour Valley Aquifer should be added to Schedule 4B.2 as both are hydraulically connected to Lake Dunstan and the main stem of the Clutha/Mata-au above Lake Dunstan. It does not make sense to exclude seasonal restrictions from these aquifers if efficient use of water is to be maximised and the objective of 4B.2, to help maintain lake levels, is to be met.

77 Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, and Te Runanga o Otakou (collectively Kai Tahu)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Overall approach - general support	Support	Support the underlying principles of this plan change.	<ul style="list-style-type: none"> • Supports the precautionary approach taken by ORC to the management of freshwater resources in this catchment. • PPC5A provides an opportunity to address historical over-allocation of freshwater in this catchment and to restore a meaningful continuity of flow to the Lindis River
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Require a minimum flow of 1,000 l/s from October to May.	<p>A minimum flow of 1,000 l/s:</p> <ul style="list-style-type: none"> a) recognises and provides for Kai Tahu relationship with the Lindis River and for the cultural values, beliefs, uses and traditions identified for the Lindis River (including continuity of flow; integrated management; variability of flow; mahika kai; kaitiakitaka; recreational use and wahi tupuna (ancestral landscape)); b) provides 54% of the natural 7-day MALF of the Lindis River, and achieves an appropriate balance between cultural values, instream values, and economic uses in the catchment; c) enables Kai Tahu to express mana and meet obligations as kaitiaki; d) ensures the quality and quantity of the Lindis is sufficiently high to protect its mauri (life-force) particularly in the lower and middle reaches; e) ensures continuous flow throughout the entire length of the Lindis River, with approximately 500 l/s remaining in the river at the Clutha/Mata-au confluence; f) provides 91% of the habitat available for longfin eel at MALF; g) ensures consistency with the NPSFM, the Te Runanga o Ngai Tahu Freshwater Policy, and the Kai Tahu ki Otago Natural Resource Management Plan; and h) achieves the purpose of the RMA.
7	Non-irrigation season primary allocation minimum flow 1,600 l/s	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Support	Support 1,600 l/s (1 June to 30 September) minimum flow at Ardour Road.	Recognises and provides for Kai Tahu relationship with the Lindis River and for the cultural values, beliefs, uses and traditions identified for the Lindis River.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Support	Support a primary allocation limit of 1,000 l/s.	A primary allocation limit of 1,000 l/s recognises and provides for Kai Tahu relationship with the Lindis River and for the cultural values, beliefs, uses and traditions identified for the Lindis River (including continuity of flow; integrated management; variability of flow; mahika kai; kaitiakitaka; recreational use and wahi tupuna (ancestral landscape), and better achieves the purpose of the RMA.
26	Minor and consequential	Minor and consequential changes	Amend	Implement the relief sought, make any similar amendments with like effect to the relief sought, and make any consequential amendments necessary to give effect to the relief sought.	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Supplementary allocation regime (min flow and allocation)	Schedule 2B - Supplementary allocation regime	Support	Support the supplementary allocation regime and the associated minimum flows.	No reason given.

78 Wayne and Billee Marsh

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Increase the l/s minimum flow to guarantee there will be 'no risk to the ecosystem downstream from the SH8 bridge'.	A minimum flow of 900 l/s would: a) achieve that there is no risk to the ecosystem downstream of the SH8 bridge; b) allow vital and substantial ecological gain, while the economic loss is minor; c) uphold the objectives of the NPSFM; d) uphold the spirit and ideals of the Tarras Community Plan 2007 (which recognised the importance of the Lindis' amenity and ecosystem values to the Tarras community, and recommended the development of a long-term strategy for an irrigation scheme to take water from the Clutha/Mata-Au); and e) enable continuous flow in the Lindis River.

79 T J Cooke

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	Review the equitable alternatives for water in the Lindis catchment.	<ul style="list-style-type: none"> • Submitter has a groundwater bore that yields up to 25 l/s and provides an alternative source of water to the Lindis River, which limits direct impacts on the Lindis River. However, this bore is considered to be in the Lindis Ribbon Aquifer (surface water). There is no opportunity for a case for better science to be put forward that could provide for alternative groundwater options to be explored within the Lindis Catchment, as any activity in the Lindis Ribbon Aquifer is prohibited. • Submitter will be cut off for an unreasonably long time should a 750 l/s minimum flow be adopted, when the lag time and the effect on the Lindis River may be less than minor. This will put a more than minor economic burden on the farm and will cause severe economic hardship.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Provide for a longer time frame for change.	Not able to prepare for a minimum flow to apply until at least 2026, as so much has to be done that requires cohesion, money, time, access, etc..
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	A summer minimum flow of 450 l/s.	<ul style="list-style-type: none"> • A minimum flow of 750 l/s causes too much hardship • Instream life benefits greatly at 450 l/s, as it is 250 l/s more than is already there at very low flow times.
8	Primary allocation limit of 1,000 l/s	Schedule 2A - Primary allocation limit	Amend	Accept a primary allocation limit of 1,500 l/s.	A primary allocation limit of 1,500 l/s more accurately aligns with the current primary allocation block.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Amend	Use geographic maps instead of the proposed Maps B4 and B7.	Exclusion is random.

80 Lindis Irrigation Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Overall approach - general opposition	Amend	Include a range of river management options which, in combination with the provisions (including the minimum flow regime) proposed by the Lindis Catchment Group, would maintain and enhance the values associated with the Lindis River.	<ul style="list-style-type: none"> The evaluation of the proposed plan change was not carried out in accordance with RMA S32, including, but not limited to, a failure to accurately assess the efficiency and effectiveness of the provisions in achieving the objectives of the RPW, including the objectives outlined above. The S32 Evaluation Report failed to identify and assess options for: <ol style="list-style-type: none"> an effective transition period and process, a range of potential river management options.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Amend Policy 6.4.5 so that implementation of minimum flow on Lindis River will not occur before October 2026	<ul style="list-style-type: none"> No feasible transition period. Policy 6.4.5 of the RPW does not provide clear process for Lindis irrigators to transition to new permits with a minimum flow and primary allocation limit regime. Irrigators are required to make substantial changes to and investment in irrigation systems on and off farm (including increasing the efficiency of use and establishing new distribution water systems). Time is needed to establish new intake structures and conveyance systems and to shift water rights to an alternative source.
5	Minimum Flow for the Lindis Catchment	Policy 6.4.5, including transition timeframes	Amend	Provide a transition package including policies and rules to create a clear process, and appropriate timeframes, for an effective transition to new water permits with conditions imposing a minimum flow regime and new primary allocation limit.	No reason given.
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Amend to a minimum flow of 450 l/s (1 October to 31 May) with an implementation date of 2026.	<p>Irrigators subject to the proposed minimum flow and shareholders connected to the Lindis catchment would be significantly adversely affected socially and economically as a result of factors including:</p> <ol style="list-style-type: none"> reduced water availability; reduced reliability of supply; and resultant challenges for all decisions about farming operations, including investment in more efficient irrigation systems.
36	Minimum flow for the Lindis Catchment	Rule 12.1.4 and mapping of the Lindis Catchment	Oppose	<ul style="list-style-type: none"> Oppose Rule 12.1.4 in so far as it is linked to Schedule 2A and Maps B4. Amend Maps B4 and B7 to include all of the true geographic area of the Lindis 	Our shareholders are spread across the whole catchment and some have irrigated land bisected by the dividing line. Excluding the Tarras Creek catchment will make partnership in new infrastructure more complicated.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				catchment.	

81 Cromwell Rod and Gun Club

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Irrigation season primary allocation minimum flow 750 l/s	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Amend	Support an improved summer minimum flow of at least 1,000 l/s.	<ul style="list-style-type: none"> • Like to see the whole ecosystem in the river restored, not just for trout. • Dislike seeing the river with zero flow for much of the summer months.

Section 2:

Grouped by Provision

(Matters within the scope of the plan change)

TABLE OF PROVISION REFERENCES

Provision (<i>grouped in the following order</i>)	Reference number	Page
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Matters beyond the scope of the plan change (Reference number 33) follow

1 Overall approach - general support

Name	Number	Position	Decision Requested	Reason for Decision Requested
Tania Seward	4	Support	Set minimum river flow levels for the Lindis to ensure the longevity of this vital river system.	<ul style="list-style-type: none"> • Concern about the lack of flow in the lower Lindis during the summer months due to excess irrigation. • The rivers of Otago are critical to the region's biodiversity. • To have the Lindis not able to flow the whole way along its length in summer is negatively affecting the environment.
Hugh van Noorden	6	Support	Implement the proposed changes setting minimum flow rates.	<ul style="list-style-type: none"> • Supports all amendments that guarantee a minimal flow in the Lindis river bed. • Need to sustain the environmental integrity of the river as a living corridor, not as a mere seasonal drain.
Jan Finlayson	8	Amend	Support PPC5A but oppose the proposed 750 l/s summer minimum flow.	No reason given.
Christine Rose	11	Support	Set minimum flow levels at a conservative limit to maintain a baseline that keeps water quantity, quality, temperature, BOD (Biochemical Oxygen Demand), and sediments at levels sufficient to protect and enhance its life-supporting capacity for an ideal mix of biological communities	Lindis has a special and rare quality in an important ecological setting and landscape. Its natural values should come first.
James Parker	13	Support	Support PPC5A.	No reason given.
Doug Peddle	20	Support	Enforce minimum flow rates.	For biodiversity and supporting long term sustainable farming practices.
Esther Whitehead	21	Support	Set a minimum flow for the river with allocation limits.	<ul style="list-style-type: none"> • To protect the Lindis river's lower reaches. • Irrigation for farming has become so detrimental to the Lindis that there is very little left of the water's natural ecosystem in summer months and this river is endangered unless we act now.
Duncan Wilcox	23	Support	Establish, maintain & enforce viable water flows for the Lindis River system and effectively manage extraction to minimise any detrimental environmental damage.	<ul style="list-style-type: none"> • In support of improving the Lindis minimum flows so that it is a viable waterway that supports aquatic species, wildlife and human recreation. • Opposed to the abusive use of Central Otago waterways for solely monetary gains by a few to the detriment of the many. New Zealand's rivers are in a steady state of decline and any and all actions need to be taken to reverse this trend. • A river is a treasure, offering a necessity of life that must be rationed among those who have power over it. • To ensure that the Lindis is here to stay, not part of the 'win the war (profits in the short term), lose the battle (loss of our environment)' mentality that dominates today's thinking.
Ian Cole	24	Support	Support PPC5A with the exception of the proposed minimum flow provision of 750 l/s.	<ul style="list-style-type: none"> • The full spawning potential of the Lindis has been historically compromised under depleted river flows. • The local and wider communities of the area have an historic opportunity to restore river flows to more environmentally sustainable levels for long-term wider community benefits. • While it is recognised that water is a crucial factor to long term economic viability of the local community alternatives do exist. The limited potential contribution of the Lindis is insignificant compared to other water take alternatives.
Clutha Sports Fisheries Trust	36	Support	Support PPC5A conditionally; confirm provisions other than summer minimum flow .	Generally supports PPC5A with the exception of the summer minimum flow provision of 750 l/s.

Name	Number	Position	Decision Requested	Reason for Decision Requested
John and Marilyn Barlow	48	Support	Support PPC5A except summer minimum flow proposed.	Generally supports PPC5A with the exception of the summer minimum flow proposal of 750 l/s.
J. Murray Neilson	66	Support	Confirm provisions, other than primary irrigation season minimum flow, as drafted.	<ul style="list-style-type: none"> • ORC must set an environmental flow for the Lindis which meets NPSFM objectives, in particular B1, B2 and B3. • ORC <u>must</u> provide for the compulsory values, <u>may</u> provide for other national values or other values, <u>while</u> considering impacts on local communities and people (emphasis added). Addressing environmental matters and over-allocation come first; everything else is secondary but can be provided for while meeting those objectives.
Department of Conservation	70	Support	Retain as notified.	<ul style="list-style-type: none"> • Support proposed minimum flows and allocation limit for the Lindis. • Consistent with purposes and principles of the RMA. These provisions give effect to Part 2 of RMA, NPSFM and RPS, Policies 7(a) & (d) of the Conservation General Policy (2005), and to the Otago Conservation Management Strategy. • These will safeguard the life-supporting capacity of Lindis aquatic resources and sustain its fishery values. • Submitter supports initiatives to improve flows in the Lindis River catchment especially during the drier months of the year. Achieving more consistent flow and connection to the Clutha River is considered to be important for fish passage and the ecosystem health of the lower catchment generally. • Longfin eel, and common and upland bully are present in the Lindis main stem, and the “Nationally Critical” status Clutha flathead galaxias is restricted to tributaries often above barriers to trout predation and competition.
Contact Energy Ltd	76	Support	Support the approach to managing allocation in a dry and over-allocated catchments Support PPC5A and in particular: <ul style="list-style-type: none"> • Managing and protecting water bodies, including aquifers, from over-allocation, and • Promoting the efficient and sustainable use of water resources. 	<ul style="list-style-type: none"> • Lack of precipitation can result in Lindis running dry, coinciding with greatest irrigation demand. • 1,600 l/s at Lindis Peak reduces to 177 l/s at Ardour Road, due to takes between the two sites. • Catchment is severely over-allocated with over 4,000 l/s consented take.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, and Te Runanga o Otakou (collectively Kai Tahu)	77	Support	Support the underlying principles of this plan change.	<ul style="list-style-type: none"> • Supports the precautionary approach taken by ORC to the management of freshwater resources in this catchment. • PPC5A provides an opportunity to address historical over-allocation of freshwater in this catchment and to restore a meaningful continuity of flow to the Lindis River

2 Overall approach - general opposition

Name	Number	Position	Decision Requested	Reason for Decision Requested
The Point Partnership	22	Oppose	Oppose PPC5A; or amend as shown in the submission.	<ul style="list-style-type: none"> • Notified plan change will not achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW. • Evaluation of options was not carried out in accordance with RMA S32 • Notified plan change is inconsistent with the NPSFM which supports the use reasonable adjustment timeframes and requires the use of the best available information and scientific and socio-economic knowledge.
John Davis	33	Amend	Provide a much more holistic approach to total river	• PPC5A will not enable people and communities to provide for social and economic

Name	Number	Position	Decision Requested	Reason for Decision Requested
			management.	<p>wellbeing, as provided for in the RMA. The effect of this change to the Tarras district and community will be severe and long-lasting.</p> <ul style="list-style-type: none"> • ORC has not officially looked at mitigating the minimum flow by: <ul style="list-style-type: none"> a) Supplementation of water in low flow time from the Clutha/Mata-Au. b) Looking at allowing fish to navigate through a pipe. c) Removing gravel and improving the channel flow in the lower Lindis. d) Enhancing flow by removing a large percentage of willows, leaving strategic trees for picnic spots, camping, and fish shade. e) Enhancing fishing experience by managing willows in the river's assigned course. Renew attempts to "tidy the river". f) Better active fish management. There has been little interest in the Lindis as a fishery. If, as is claimed, this is so important for fish spawning, why is there no attempt to physically move small fish up or down stream in times of low flow?
Timburn Ltd	44	Amend	Amend PPC5A as per Lindis Catchment Group.	<ul style="list-style-type: none"> • The Lindis plays a huge part in the ability to farm our property and enjoy the lifestyle, community and recreation supported by this environment. • A fair outcome of this plan change process should mean that the community can carry on as it has for years and should not be pushed into financial hardship.
Malvern Downs Ltd	47	Did not specify	Provide full consideration of the community's identified values, specifically those relating to the 'availability of water for irrigation during the growing season'.	<ul style="list-style-type: none"> • ORC has not met its planning responsibilities. • Full consideration of the community's identified values must be provided for, specifically those relating to the 'availability of water for irrigation during the growing season'. • To date, present and future impacts have not been appropriately considered or evaluated.
Tim Davis	53	Amend	Adopt some of these unique solutions as part of the management regime.	<ul style="list-style-type: none"> • A series of think tanks were undertaken between Fish and Game and the Lindis Catchment group where flow management solutions were talked about (including channel management, willow removal, gravel extraction, flushing flows, relocation of points of take, and transition arrangements). None of these provisions and transitions has been inserted into PPC5A. • ORC should look at all options to increase the values, not just a blunt instrument such as a minimum flow. • The Lindis catchment is one of the driest catchments in the country and needs a flow management regime that recognises this. • ORC has failed to take an approach that recognises the unique characteristics of the Lindis catchment and where every stakeholder can share in the improvements, and the costs are not borne by just the local community. • The proposed water management regime has not had a lot of input from the local community. • Real consultation took place during a series of think tanks between Fish and Game and the Lindis Catchment Group.
Lindis Catchment Group Inc	56	Amend	Include a package of provisions and amendments to existing provisions that provide a holistic approach to river management specifically tailored to the Lindis catchment.	<ul style="list-style-type: none"> • PPC5A fails to provide a holistic and robust river management regime which will enable effective management of in-stream low flow conditions. • ORC is relying on existing generic provisions of the RPW to manage the Lindis catchment during low flows. However, existing generic provisions have either been

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>ineffective or have not been utilised to effectively manage low flow conditions in dynamic catchments such as the Lindis.</p> <ul style="list-style-type: none"> • An integrated and holistic approach is required for dynamic low flow environments such as the Lindis catchment. • Need for the inclusion of a range of river management options and tools which, in combination with the provisions (including the minimum flow regime) proposed by Lindis Catchment Group, would maintain and enhance the values associated with the river while managing low flows within an alluvial river system in a reliable and timely manner. • Failure to provide for a holistic river management regime results in PPC5A not achieving the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • The evaluation of the proposed plan change, including: <ul style="list-style-type: none"> a) The transition timeframes provided by Policy 6.4.5; b) The proposed minimum flow of 750 l/s (1 Oct to 31 May); c) The proposed primary allocation limit of 1,000 l/s; d) The proposed change to Rule 12.1.4.4 in combination with the proposed catchment boundary in Maps B4 and B7; and e) The restriction on taking water from the Bendigo and Lower Tarras aquifers, was not carried out in accordance with S32 of the RMA, including, but not limited to, a failure to: <ul style="list-style-type: none"> i. accurately assess the efficiency and effectiveness of the maps and associated provisions in achieving the RPW objectives. ii. accurately identify or assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the proposed changes. iii. identify and assess options for an effective transition period and process, and a range of potential river management options. • Insufficient justification is provided for the proposed primary allocation limit, and no account is taken in the S32 Evaluation Report or proposed provisions of how a primary allocation limit works in combination with a minimum flow to impact on water availability and reliability.
Federated Farmers of New Zealand	57	Amend	That full consideration of the community's identified values is provided for, specifically those relating to farming and irrigation where, to date, present and future impacts have not been appropriately considered or evaluated.	<ul style="list-style-type: none"> • There has not been any meaningful or constructive engagement and consultation with landowners regarding an appropriate minimum flow or the primary allocation limit. • Farming viability and the local economy were identified as primary considerations through community discussions. • The compulsory values ('ecosystem health' and 'human health for recreation') recognised by the NPSFM should not be prioritised above any other values that are considered relevant at a regional or local level. • When considering the range of values it is appropriate that focus turns to where the costs and risks lie, where opportunities will be lost and where the most pain will be. Landowners will be the ones who suffer the most under any minimum flow process.

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>We do not consider this has been adequately reflected by ORC.</p> <ul style="list-style-type: none"> • ORC has not met its planning responsibilities for the following reasons: <ul style="list-style-type: none"> a) Under the requirements of the RMA and NPSFM and the objectives of the RPW, ORC has the responsibility to provide for a fair, reasonable management regime and must ensure an appropriate balance between competing demands. b) When water is allocated, the social, economic and cultural values associated with particular water bodies must be balanced both with each other and with environmental values. c) The rights of existing users must be allowed for when setting environmental flow and water management regimes, in order to both protect existing infrastructure and investment, and to safeguard productive capacity.
J. Murray Neilson	66	Amend	Adopt the submission of the Otago Fish and Game Council (submitter 54) in its entirety.	Submitter agrees with submissions (of Fish & Game) and adopts them in their entirety.
Beau Trevathan	69	Oppose	Specific provisions of PPC5A are opposed or requested to be amended.	<p>PPC5A is inconsistent with RMA, ORC Plans and National Policy Statements, and:</p> <ul style="list-style-type: none"> a) will not achieve the purpose of the RMA as it will not enable people and communities to provide for their social and economic well-being. b) will not achieve the objectives and policies of the RPS, PRPS and RPW. c) are based on an evaluation that was not carried out in accordance with S32 of the RMA d) are inconsistent with the NPSFM, which: <ul style="list-style-type: none"> - supports reasonable adjustment timeframes that take into account the economic effects likely to result from a change in approach to managing a freshwater resource; and - requires freshwater management to be informed by the best available information and scientific and socio-economic knowledge.
T J Cooke	79	Amend	Review the equitable alternatives for water in the Lindis catchment.	<ul style="list-style-type: none"> • Submitter has a groundwater bore that yields up to 25 l/s and provides an alternative source of water to the Lindis River, which limits direct impacts on the Lindis River. However, this bore is considered to be in the Lindis Ribbon Aquifer (surface water). There is no opportunity for a case for better science to be put forward that could provide for alternative groundwater options to be explored within the Lindis Catchment, as any activity in the Lindis Ribbon Aquifer is prohibited. • Submitter will be cut off for an unreasonably long time should a 750 l/s minimum flow be adopted, when the lag time and the effect on the Lindis River may be less than minor. This will put a more than minor economic burden on the farm and will cause severe economic hardship.
Lindis Irrigation Ltd	80	Amend	Include a range of river management options which, in combination with the provisions (including the minimum flow regime) proposed by the Lindis Catchment Group, would maintain and enhance the values associated with the Lindis River.	<ul style="list-style-type: none"> • The evaluation of the proposed plan change was not carried out in accordance with RMA S32, including, but not limited to, a failure to accurately assess the efficiency and effectiveness of the provisions in achieving the objectives of the RPW, including the objectives outlined above. • The S32 Evaluation Report failed to identify and assess options for: <ul style="list-style-type: none"> a) an effective transition period and process, b) a range of potential river management options.

6 Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation

Name	Number	Position	Decision Requested	Reason for Decision Requested
Bruce Lambie	1	Amend	Set the minimum flow of the Lindis River at 1,000 l/s at the Ardour flow recorder.	<ul style="list-style-type: none"> • This is the minimum flow to maintain a healthy ecosystem. • The Lindis River has been historically very over-allocated. The situation has worsened with the arrival of intensive cattle farming and industrial scale irrigation via pivot irrigators. • The Lindis river is a very important spawning tributary of Lake Dunstan, and this needs to be enhanced, not compromised. • If there is insufficient flow, the trout fingerlings (as well as adult trout) are too easily eaten by predators and cannot return to the Clutha/Mata-Au.
Otago Natural History Trust	2	Amend	Set the minimum flow higher to ensure the maintenance of the braided river flow through to the Clutha/Mata-Au, ie, that the lower Lindis flow should be maintained throughout the summer. That may require 1,000 l/s, or more.	<ul style="list-style-type: none"> • Maintaining the natural state of the Lindis is vital for the survival of the severely endangered wading birds (in particular the Black Stilt). • Everything possible should be done to reduce the water take from the Lindis River. • A healthy flowing river is desirable for the total ecology of the river (fish and other aquatic life). • The proposed changes need to ensure that the natural right of all New Zealanders to be able to swim in clean, fresh rivers in summer is restored.
Russell McKendry	3	Amend	The minimum flow should result in continuous flow throughout summer and connection to the main-stem of the Clutha/Mata-Au.	The proposed minimum flow of 750 l/s is risky and may be too little to sustain a healthy river. A minimum flow of 1,000 l/s is fair. 750 l/s is only 53% of MALF so a 1,000 l/s summer minimum flow has to be seen as a pragmatic compromise.
John Highton	5	Amend	Set a minimum flow sufficient to maintain a flow in the river at all times, and sufficient flow to provide a year round viable habitat for fish. This requires an absolute minimum of 1,000 l/s.	<ul style="list-style-type: none"> • Provides for the maintenance of the life supporting capacity of the Lindis River. • Want to see continuous flow in the Lindis River year round so that the river can realise its full potential as a spawning stream, especially for the very vulnerable Lake Dunstan fishery. • It is distressing to see the Lindis dry at the main road bridge, and this occurs regularly in summer.
Peter Sayers	7	Amend	Raise the minimum flow to 1,000 l/s.	<ul style="list-style-type: none"> • The Lindis River can only be fished in the early part of the season. The river is a lost cause anytime after that. • Do not like seeing flows slow to the point where fingerlings (our resupply of stocks) are dying in the remaining pools.
Jan Finlayson	8	Amend	Set a minimum summer flow of at least 1,000 l/s, measured at Ardour Road.	<ul style="list-style-type: none"> • At 53% of MALF, 1,000 l/s is still a significant compromise. • Elevated temperatures and reduced capacity for dilution of contaminants remain as issues. • The draft NESEFWL suggests a minimum flow of 80% of MALF. However, the river is likely to be able to function meaningfully at 53% of MALF.
Otago Anglers' Association	9	Amend	Set a summer minimum flow of at least 1,500 l/s, as measured at the Ardour Road flow recorder.	<ul style="list-style-type: none"> • Sympathises with irrigators' economic needs, but irrigators have known for 20 years this day would be coming. Entrenched agricultural interests have dominated resource use for too long. • ORC needs to set higher minimum flows on all rivers with a MALF of 5,000 l/s or less. • The draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of 5,000 l/s or less. The recommended minimum flow of 1,500 l/s equals 80% of MALF. • A flow of greater than 1,500 l/s will ensure that there is a meaningful flow in the

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				<p>lower river, good water quality, cooler temperatures, and restore the natural character, amenity, and juvenile fishery values of the lower river.</p> <ul style="list-style-type: none"> • A flow of 750 l/s is half of what a healthy stream needs, and in dry parts of Otago a small healthy, accessible stream is important for trout, native fish and for teaching young anglers. • The minimum flow proposed violates RMA S5(2)(b), S6(c), S7(c) and S7(h). • Deterioration during low flows threatens to continue killing aquatic life. • Restoring the Lindis to a fully functioning ecosystem would encourage a more diverse local and national economy. Irrigation interests should not be prioritised above the rest of the economy.
Gordon McManus	10	Amend	Adopt a minimum flow of 1,250 l/s.	<ul style="list-style-type: none"> • Have seen a dry bed on many visits to the Lindis where a river should be, which is unacceptable, and is due to past over-allocation which has to cease. • The RPW clearly states existing alternative water sources should be used in over-allocated catchments. Some farmers have invested in irrigation schemes that provide alternatives knowing that deemed permits expire in 2021. • A living river needs to be reinstated for all to enjoy and cherish.
Quentin Smith	12	Did not specify	Apply a reasonable minimum flow to the Lindis River.	<ul style="list-style-type: none"> • Rivers are the lifeblood of our environment. • The minimum flow is needed to maintain fisheries, freshwater ecology and amenity.
John Batchelor	14	Amend	Adopt a minimum low-flow in the Lindis River of 1,200 l/s.	<ul style="list-style-type: none"> • The draft NESEFWL recommends 80% of MALF. Therefore, a minimum flow of 1,200 l/s is not un-reasonable. • There are other sources of water available in this area for irrigation. The Lindis River is the easy choice but must not be over-allocated.
Ella Lawton	15	Amend	Set a summer (1 Oct- 30 Apr) minimum flow of at least 1,000 l/s, as measured at the Ardgour Road flow recorder.	<ul style="list-style-type: none"> • A flow of 1,000 l/s is 53% of MALF for the river and represents a considerable concession to irrigators. • The draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of greater than 5,000 l/s. • The farmers have had 30 years to transition to alternative water sources (eg groundwater and Clutha/Mata-Au), knowing that deemed permits expire in 2021. Some farmers have already invested heavily in irrigation schemes that provide alternatives. • The RPW is clear that where alternative water sources exist in over-allocated catchments that these should be used instead. • This decision defines the future of the Lindis River. If we do not ensure the health of the river from this point forward, we will say goodbye to it forever. • The financial benefits of a few should not dictate the future of this precious common place.
Johnny Mauchline	16	Amend	Set a summer minimum flow of at least 1,000 l/s, as measured at the Ardgour Road flow recorder.	<ul style="list-style-type: none"> • A minimum flow of 1,000 l/s will ensure a meaningful flow in the lower river, good water quality, cooler temperatures, and restore the natural character, amenity, and juvenile trout fishery, eel, and native fish values of the lower river. • A minimum flow of 1,000 l/s, 53% of MALF, represents a considerable concession to irrigators. The draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of greater than 5,000 l/s.

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • The river is an excellent fishery and fishing the river brings benefits to the local economy. • Alternative water sources are available (groundwater and Clutha/Mata-Au) and some farmers have already invested heavily in irrigation schemes that provide alternatives. The RPW states alternative water sources that exist in over-allocated catchments should be used instead. • Farmers had 30 years to transition to alternative sources, knowing deemed permits expire in 2021.
Richard Sidey	17	Amend	Require a summer minimum flow of at least 1,200 l/s.	Healthy rivers are essential to our region, for recreation and ecosystem, and a vital necessity to native fish and eel species.
Aliscia Young	18	Amend	Require a summer minimum flow of at least 1,200 l/s.	Healthy rivers are essential to our region, for recreation and ecosystem, and a vital necessity to native fish and eel species.
Backcountry Matters	19	Amend	Make the minimum flow figure not less than 1,000 l/s.	<ul style="list-style-type: none"> • A minimum flow of 750 l/s will have a significant deleterious effect on water quality, including temperatures and wildlife habitats, and represents about half the allowable figure in the draft NESEFWL. • A minimum flow of 1,000 l/s would be an acceptable compromise and mean that native fish habitat would not be as degraded as at the proposed levels. • Alternative sources of water (Clutha/Mata-Au or groundwater) are available for irrigation.
The Point Partnership	22	Amend	Amend to a lower minimum flow of 450 l/s during 1 October to 31 May.	<ul style="list-style-type: none"> • Irrigators would be significantly adversely affected socially and economically, including for the following reasons: <ul style="list-style-type: none"> - The proposed minimum flow would have a devastating effect on farming viability. - It is totally out of balance as it gives a huge boost to the natural and iwi values at the expense of social and economic ones. - It does not reflect the consensus of the workshops that ORC held when the community was involved. • The amendment sought would enable people and communities to provide for their social and economic wellbeing while also meeting all legislative requirements focusing on protecting natural and iwi values.
Ian Cole	24	Amend	Amend to a minimum summer flow of 1,000 l/s.	<ul style="list-style-type: none"> • There are significant mortalities, strandings and barriers to out-migration of juvenile trout under low flows. • An increase in the summer minimum flow to 1,000 l/s is far more likely to ensure connectivity to the Clutha/Mata-Au, improve the sports fishery and enhance the recreational amenity afforded by the river. • The local and wider communities of the area have an historic opportunity to restore river flows to more environmentally sustainable levels for long-term wider community benefits. • While it is recognised that water is a crucial factor to long term economic viability of the local community alternatives do exist. The limited potential contribution of the Lindis is insignificant compared to other water take alternatives.
Future by Design Ltd	25	Amend	Set a minimum flow of at least 1,000 l/s during the summer period.	<ul style="list-style-type: none"> • Summer minimum flow of 1,000 l/s is “reasonable” and allows some capacity for irrigation.

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				<ul style="list-style-type: none"> • Lindis flows can be very low in mid-Summer. It is a magnificent part of the country and maintaining a reasonable flow is an essential part of the local ecology. • 1,000 l/s is just over half of the river's MALF and given that the draft NESEFWL recommends a minimum flow of 80% of MALF for rivers with a median flow of greater than 5,000 l/s • A 750 l/s summer minimum flow is out of line with national requirements and will have a substantially deleterious effect on the river ecosystem.
Clutha Mata-Au River Parkway Group	26	Amend	Decide in favour of a summer minimum flow of at least 1,000 l/s, as measured at the Ardour Road flow recorder.	<ul style="list-style-type: none"> • A summer minimum flow of at least 1,000 l/s would: <ol style="list-style-type: none"> a) maintain aquatic ecosystems and support native species (such as koaro, the endangered longfin eel and Clutha flathead galaxias, common bully, and upland bully); b) support brown and rainbow trout, during spawning and juvenile rearing, and give some surety to the river as a fishery and as a breeding habitat; and c) maintain the natural character of the river and its general amenity values, providing local people and visitors with reliable sites for summer picnics and swimming etc. • The farmers in the region are fully aware that the river is subject to low summer flows and that it cannot be considered a reliable source of irrigation water. They have had 30 years to transition to alternative water sources and/or adapt their farming practices, knowing that deemed permits expire in 2021.
Claas Harvest Centre Otago	27	Amend	Oppose the minimum flow of 750 l/s to be applied in 2021.	<ul style="list-style-type: none"> • A minimum flow of 450 l/s causes too much economic hardship. • Reliability of irrigation under the proposed minimum flow will not be sufficient to grow crop (e.g. grow fodder) beet economically. Reduction in production and increase in drought-tolerant species will result in dramatic decrease of the economic viability of farms. • The proposed minimum flow and resulting need for farmers to move to lower costs of production in turn will result in fewer sales and less plant replacement, and likely less use of local contractors who work within the Tarras/Lindis area.
Gerald Telford	28	Amend	Set a minimum flow of 450 l/s (being more than double the existing 200 l/s).	<ul style="list-style-type: none"> • Provides a pathway to balance enhanced river low flow and ensures continued farming with efficient water practices. • The livelihoods of the members of the Lindis Catchment Group are connected to the river flows and with this comes the responsibility to all users both commercial and recreational. • The Lindis Catchment Group can continue under new and better practice to draw the water deemed necessary to support their agricultural operations and believes the increased flows outlined by the group will have considerable benefit for the continued health of the present fishery. • The Lindis is a fine, if not always consistently healthy, self-sustaining fishery. • No one owns the water; it belongs to the community, locally and nationally.
Kent McElrae	29	Support	Maintain the minimum flow of 450 l/s.	<ul style="list-style-type: none"> • Restrictions on irrigation will drastically reduce the productivity of my land and reduce the value of my property. • Lindis has great soils, with huge potential. • Restrictions on irrigation will have a social impact on the number of people moving

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				to the area (e.g. school needs more kids for teachers).
Rebecca McElrae	30	Amend	Set a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • The proposed minimum flow of 750 l/s will affect the community in a very negative way (loss of jobs, loss of farm viability, fragmentation of the community, migration from the area). • Currently, we have a strong community which is growing and this provides a sense of wellbeing for all who live here. • The school, which has been a major part of building our strong community, will close should the proposed minimum flow of 750 l/s be adopted, as people will leave the area. We want our children to experience going to a rural school and learning the values that can only be provided by a small rural community.
Adam Spiers	32	Amend	Apply a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • The suggested 450 l/s minimum flow returns over 250 l/s of currently abstracted water to the river and improves the health of the river markedly. • The suggested 450 l/s minimum flow was until recently the recommended flow of the ORC.
John Davis	33	Amend	A more equitable minimum flow of 250 l/s for all values.	<ul style="list-style-type: none"> • Science behind the increase in the minimum flow smacks of “getting science to fit an outcome”. • The ORC had already decided on a 450 l/s minimum flow in the Lindis and, without further consultation, increased this to 750 l/s. Other parties besides the local community were aware of this and the local community found this out by my chance attendance at an address given to a local group in Wanaka by a fish expert. • There are many flaws in the data used in the S32 evaluation. To have one year of flow information (photos) is not sufficient on which to base flow rates to the Clutha/Mata-Au. It was a prolonged dry period last year. • The effects of minimum flow of 750 l/s will be devastating for land based activities and the wider community for the following reasons: <ol style="list-style-type: none"> a) “loss of use” is equivalent to removing 1,500 ha of irrigation (using the efficiency of use formula of 0.5 l/s/ha); b) the “percentage restriction” to achieve a minimum flow of 750 l/s spread over all takes means efficient irrigation will not happen over long periods in summer; c) the availability of water for efficient irrigation is crucial to the activities carried out with irrigation. Crops and pasture cannot be grown without sufficient and reliable water at the correct time; d) Tarras is one of the driest areas of NZ, and the effect of not having water available in sufficient quantity will flow onto loss of land-based income, flowing to the wider community, employment, contractors, farm services, and more. • The protection of native fish could be mostly achieved at 250 l/s. Any increase in trout numbers may increase predation on galaxiids. • Trout have adapted to their environment and are managing to exist in the river now with good stocks in the middle reaches. With a change in position of takes, their habitat is greatly enhanced, with full connectivity above the Ardour monitoring site. • Iwi values will be maintained and enhanced and Iwi expectations could mostly be

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>achieved with water flowing to the Clutha/Mata-Au most of the time.</p> <ul style="list-style-type: none"> • With the change in takes over time and phasing out gravity races and replacing them with pumping takes much further downstream, a much enhanced flow in the river will allow an even better continuous flow of water. • Land-based activities and the local community would have a better outcome with 250 l/s than at 750 l/s. • Submitter will not be able to maximise efficient use of 3 recently installed centre pivot. Water supplies could drop to 10% in dry seasons, not allowing important and expensive crops to be grown. • Native fish values will be protected at 450 l/s. Galaxiids occur in many tributaries, currently protected by limited trout in the main stem. Any increase in trout habitat will lead to increased predation on galaxiids and man-made barriers are not straightforward to implement.
Jay Cassells	34	Amend	As submitted by Fish and Game	A minimum flow of at least 1,000 l/s is appropriate. See reasons advanced by Fish and Game.
Ainsley Shearing Ltd	35	Amend	Set a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • A 750 l/s minimum flow to be applied in 2021 causes too much economic hardship. • Decreasing the availability of water would have a profound effect on my business and workforce and has the ability to affect a lot of people's livelihoods. • Have seen farming practices change as farmers have had to adapt in very trying times to make their farms viable.
Clutha Sports Fisheries Trust	36	Amend	Amend the summer minimum flow of 750 l/s applying from 1 October to 31 May to 1,000 l/s or higher and that flow to apply from 1 October to 30 April each year.	<ul style="list-style-type: none"> • Sports fisheries values: Lake Dunstan and the Upper Clutha/Mata-Au sustain a very significant recreational fishery for rainbow and brown trout and to a lesser extent salmon. The Lindis is a high value spawning and rearing water except that its full potential is limited by depleted flows, fish strandings and mortalities, and barriers to outmigration of juvenile trout when disconnection occurs. Extending summer minimum flows into May encroaches on a time when fuller flows are required in-river. The Lindis is also a small stream fishery in its own right and improved river flows will restore adult habitat in presently depleted reaches. • Native fish habitat values: The Lindis provides habitat for a range of native fish, including rare non-migratory galaxiids, bullies and eels. Bullies suffer heavy mortalities under the present flow regime. Eels are also regularly found in the river. With restored flows, Contact Energy Ltd's obligations under RMA consents to provide upstream passage will result in the river becoming a more important eel habitat in the future. • Wildlife habitat: Flows need to be increased to restore wading bird habitats in the lower reaches, including braided characteristics, below Lindis Crossing. • Even under the present flow regime the Lindis is popular for outdoor recreation over summer for activities including camping, picnicking, swimming and fishing. The river's relatively small size provides a safe alternative for family recreation involving children. Depleted summer flows limit the river's recreational potential. Downstream of Lindis Crossing camping opportunities are lost when the river dries up. • Life-supporting capacity of the river: Under the present flow regime river

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				<p>ecosystem functioning is first degraded and then lost altogether as the river flow drops over summer and eventually ceases altogether in some reaches. This is a failure in environmental management. Sufficient flows must be restored to the river to maintain in a healthy state and to limit high water temperature and nutrient levels. No Lindis water should be available for use outside of the Lindis catchment. Any such takes should be returned to the Lindis River for environmental benefit.</p> <ul style="list-style-type: none"> • Landscape values: The routine loss of flow in the lower river reaches over summer diminishes landscape values. The minimum flow needs to restore the Lindis as a landscape feature within the valley.
Matthew Sole	37	Amend	Set a summer minimum flow of at least 1,440 l/s, as measured at the Ardgour flow recorder.	<ul style="list-style-type: none"> • The Lindis has a long history of over-allocation. Mining privileges were allocated with no or little understanding of river systems and with no regard for instream values. • Progress is being made by land users on alternative water sources and more efficient application. • Where alternative water sources (groundwater and Clutha/Mata-Au) are available to land users in over-allocated catchments these should be used. The need to transition to alternative sources has been clearly signalled with a thirty year time frame. • Now is the time to change water extraction practices to reinstate meaningful natural flows in the lower river and provide for good water quality, cooler temperatures, natural character, amenity and fishery values. • Land management practices need looking at in relation to water harvesting with a view to reversing the significant degradation of our upland tussock and inter-tussock species and their natural water collection and holding systems and functions. This is a contributing factor to the quality and availability of water inflows and recharge. • A minimum flow of 1,440 l/s is the draft NESEFWL's recommendation of 80% of MALF for rivers with a median flow of greater than 5,000 l/s. • The amenity experience of a river is closely related to the level of flow within the river. For the Lindis, this means a functioning and healthy braided river system in the lower reaches. Not dry stones and dewatered hollows and stressed riparian values.
Cloudy Peak Ltd	39	Amend	Apply a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • The suggested summer minimum flow of 450 l/s returns over 250 l/s of currently abstracted water to the river. It improves the health of the river. • Up until recently 450 l/s was the recommended summer flow of the ORC. • Submitter fully supports the benefits of a summer minimum flow of 450 l/s to other members of the community and the survival of young trout. • We have already made a considerable investment into spray irrigation that was required to fulfil our obligations for our resource consent. • For the ORC to not take into account the real impact that losing another 250 l/s of totally reliable water will have on farms in the area is seen as a real failure. • The economic report did not make any effort to understand the needs of irrigators. I find this very disquieting, and displays a lack of respect for those that rely on this river to make their living.
Fraser Hocks	40	Amend	Amend to at least 1,000 l/s.	<ul style="list-style-type: none"> • A dry river bed is a dead river bed. Without water in our rivers we simply don't have a river.

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				<ul style="list-style-type: none"> • The Lindis stream acts as a major spawning tributary for the catchment. • Without a minimum flow of at least 1,000 l/s fish are unable to survive in this river.
Mike Lane	41	Amend	Amend to at least 1,000 l/s.	<ul style="list-style-type: none"> • A dry river bed is a dead river bed. Without water in our rivers we simply don't have a river. • The Lindis stream acts as a major spawning tributary for the catchment. • Without a minimum flow of at least 1,000 l/s fish are unable to survive in this river.
J.C.A Lucas	42	Amend	That the maximum Lindis River minimum flow be no greater than 450 l/s.	The Tarras district relies on irrigation to maintain farming production, population and services.
Upper Clutha Angling Club	43	Amend	That a minimum flow of not less than 1,000 l/s be set for the Lindis River during the summer period, measured at Ardour Road bridge.	<ul style="list-style-type: none"> • Supports the setting of minimum flows for the Lindis River. • Excessive water abstraction has compromised a healthy aquatic environment in the Lindis. The very low flows that have occurred over extended periods in the summer due to abstraction threaten fish populations. Drying reaches of the river often result in both adult and juvenile fish mortality due to stranding, heat stress, lack of oxygen and predation. • The Lindis is not considered a particularly good fishing river. It is highly likely that a major factor influencing this is the degraded state of the lower river reaches in the summer. Restoration of a healthy summer environment in the Lindis through a suitable summer flow regime may result in an improved fishery. • The Lindis is an important trout spawning stream, contributing fry and fingerlings to Lake Dunstan which is a very important recreational fishery. The populations of sport fish in our lakes are entirely dependent on continued access of both adult fish and juveniles to and from the spawning grounds that lie in the inflowing rivers. • A minimum flow of 750 l/s is not sufficient to maintain continuous stream flows and fish passage to and from Lake Dunstan during the critical summer period. There is strong scientific evidence that the proposed summer minimum flow of 750 l/s would result in significant adverse effects on fish stocks in the Lindis River and on aquatic ecosystem. • There is insufficient economic benefit from the additional 250 l/s being available for abstraction under a 750 l/s minimum regime compared to a 1,000 l/s minimum to offset this adverse environmental impact. • Research has shown that a minimum flow of 1,000 l/s during the summer period would be sufficient to maintain surface flows, and thus a connection and migratory pathway for fish to and from Lake Dunstan. • A minimum flow of 1,000 l/s during the summer period will help to mitigate the full impact of any stressors (naturally low flows, high temperatures and predation) impacting fish and would substantially improve the recreational amenity of the river for anglers and other users.
Lindis Downs Ltd	45	Amend	Amend to lower the summer minimum flow to 450 l/s	<ul style="list-style-type: none"> • Proactive irrigators have adjusted to more efficient water use systems after being led to believe the minimum flow recommended by ORC was to be set at 450 l/s. • During an extended dry period irrigators would be running at 50% or less if the minimum flow was set at 750 l/s. This is an uneconomical return on capital investment. • It is yet to be proved in an extended dry season that a minimum flow of 750 l/s

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Bruce Jolly	46	Amend	Amend irrigation season minimum flow.	<p>would ensure Lindis River flows reach the Clutha/Mata-Au.</p> <ul style="list-style-type: none"> • Water for irrigation is a vital part of the economic viability of farming and any decrease in water availability will have an effect. • The irrigated land gives farming businesses robustness. In this environment the farms need more resilience to adverse events than most other areas of New Zealand, and irrigation is key to resilience. • The major gains for river environmental health are made from moving the default minimum flow of 200 l/s to 450 l/s. Any environmental gains from a minimum flow above 450 l/s are very minimal. • The economic and social impact from moving the minimum flow from 200 l/s to 450 l/s is reasonably minor if there is a transition time. The economic and social impact of a minimum flow of 750 l/s would be harsh and crippling to long term viability. • Commenced a change to sprinkler irrigation based on the assumption ORC would adopt a 450 l/s minimum flow and infrastructure was designed for the reliability that would allow. At 750 l/s the reliability of water supply plummets.
Malvern Downs Ltd	47	Amend	Adopt Option 2 of the 'Options for managing surface water in the Lindis Catchment' and set, under Schedule 2A, for the Lindis River Catchment, a primary allocation minimum flow as follows: 750 l/s October to November 450 l/s December to April 750 l/s May	<ul style="list-style-type: none"> • A summer minimum flow of 450 l/s is in line with ORC's science, reports and evaluations over a 6-7 year period and ORC-promoted 450 l/s at a public meeting in Tarras. • Water from the Lindis is the 'life blood' of Tarras. • The Lindis river is unique, in that most years it goes dry - "water goes underground and comes up 5 km downstream". • Water users have always worked together in dry times to ration the water fairly for all the water uses. The priority permit holders have always taken cuts just like the rest of the water permit holders. • A summer minimum flow of 750 l/s would mean 60 days in the middle of summer where we wouldn't have water and would put the livelihoods of my family and employees in jeopardy. • The RMA clearly states that you can't put livelihoods at stake.
John and Marilyn Barlow	48	Amend	Provide a minimum flow of 1,000 l/s or over as the minimum summer flow from 1 October to 31 May.	<ul style="list-style-type: none"> • As public property post-cancellation of deemed permits, the Lindis should return to its natural character and retain a connection to the Clutha/Mata-Au throughout the year. • A major portion of Lindis water is used outside its physical catchment. This water should be replaced by water from alternative sources as the Lindis is a small and fragile stream. • The Lindis is an important spawning stream supporting the fishery in the Clutha/Mata-Au and Lake Dunstan. • The Lindis is used recreationally by a wide variety of users who should be able to see the river as a river and not as a dry stream bed.
Gavin James	49	Amend	Proposed summer minimum flows below the Ardour Road flow recorder need to be increased.	<ul style="list-style-type: none"> • Based on the IFIM data available for juvenile brown trout, summer minimum flows (October to April) should be at least 1,000 l/s and probably nearer to 1,500 l/s to provide adequate habitat for juvenile trout. • The lower reaches of the river frequently dry up in summer thus destroying juvenile

Name	Number	Position	Decision Requested	Reason for Decision Requested
				trout and other fish in this very important spawning and rearing tributary of the Clutha/Mata-Au River and Lake Dunstan.
Environmental Defence Society Incorporated	50	Amend	Amend to 1,000 l/s.	<ul style="list-style-type: none"> • Submitter opposes the proposed minimum flow as it: <ol style="list-style-type: none"> a) does not adequately provide for/have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy. • Suggested amendment promotes the sustainable management of the natural and physical resources in the region, to comply with the RMA and give effect to the NPSFM and the relevant regional policy documents.
Environmental Defence Society Incorporated	50	Amend	Amend the summer minimum flow season from 1 October to 31 May to 1 October to 30 April.	<p>The proposed minimum flow:</p> <ol style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy.
Bryan Wrighton	51	Amend	Mandate that the minimum water flow for the Lindis is kept well above 1,000 l/s.	<ul style="list-style-type: none"> • This is a precious river, and up to now one of the very few "as God made it" rivers. • To have a minimum flow of less than 750 l/s will seriously degrade this wonderful resource. • I am a fly fisherman and enjoy the river, but more than that I want to preserve one of the few truly natural rivers in the country
Peter William Jolly	52	Amend	Set a summer minimum flow of no more than 450 l/s.	<ul style="list-style-type: none"> • No logical reason to set a minimum flow of 750 l/s. A high minimum flow will adversely affect the economic and social wellbeing of the community and thus be inconsistent with the purpose and principles of the RMA. • With a high minimum flow the water supply reliability becomes so low that it is uneconomic to sustain investment in upgraded forms or irrigation. • A minimum flow of 450 l/s is a much better balance, both economically and environmentally.
Tim Davis	53	Amend	Recommend a stepped flow of 450 l/s between October and May and also in events when the Lindis Peak flow recorder drops below 1,100 l/s drop the flow to 250 l/s.	<ul style="list-style-type: none"> • For many years the ORC had been recommending a minimum flow of 450 l/s. We have transferred the majority of our irrigation to efficient irrigation methods based on a minimum flow of 450 l/s. A minimum flow of 750 l/s puts this investment, along with the property, in serious jeopardy. • Pivots (efficient irrigation) and intermittent application do not combine well. • The economic (financial) and social effects of the 750 l/s minimum flow at a farm level, catchment-wide, and to the wider community are huge and not well understood by ORC, while the benefits are minor, negligible, or in some cases negative. • External reports from Opus and Berl are inadequate and appear to have been written to defend an outcome rather than investigate the facts. The findings of the Berl economic analyses were both vague and uncalculated. • Storage in any large degree for the Lindis catchment is uneconomic. Other cheaper alternatives (such as a lower minimum flow) are available. • A stepped flow is desirable in dry years.

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				<ul style="list-style-type: none"> • There has been a large focus on trout habitat and rearing, with very little on native species. Trout and native species, are not complementary, as any increase in trout is likely to have a detrimental effect on native species. • ORC have implied trout will be excluded by man-made barriers, but no work or consultation has been undertaken around the use of manmade trout barriers. • The river currently provides excellent trout habitat and rearing in the middle and upper reaches despite the lower reaches being in a less than desirable state. • The current state of the river with regards to water quality is very good. • The S32 Evaluation Report implies in an 'average' year economic losses will be minor. This is incorrect. • No analyses has been presented on economic losses in a dry year, the most important time for irrigation. • No evidence has been supplied to support the assertion that natural variability in the catchment has a bigger effect on reliability than the minimum flow. • The benefits of the minimum flow have been insufficiently qualified or quantified.
Fish and Game Council	54	Amend	Amend the summer minimum flow to 1,000 l/s.	<ul style="list-style-type: none"> • The proposed summer minimum flow: <ol style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS, Otago's Conservation Management Strategy, the draft Otago Conservation Management Strategy and the Sports Fish and Gamebird Management Plan of Otago. • The proposed summer minimum flow of 750 l/s does not appropriately recognise the importance of environmental protection and an adequate minimum flow as a core element of sustainable management. • A substantial amount of new information has surfaced since the original flow proposals were created including: <ol style="list-style-type: none"> a) A better understanding of the catchment hydrology and water quality impacts; b) A better understanding of how the effects of natural climate variability affect the existing security of supply for irrigators; c) A better understanding of fish behaviour, predation, and mortality during times of low flow in the lower river; d) New fisheries modelling techniques; e) New information on the availability and accessibility of alternative water sources and new developments in irrigation infrastructure. This information justifies a higher summer primary allocation minimum flow for the river. • A minimum flow of 1,000 l/s promotes the sustainable management of the natural and physical resources in the region, complies with the RMA and gives effect to the NPSFM and the relevant regional policy documents. • The draft NESEFWL recommends the setting of minimum flows at no less than 80% of MALF for rivers with a mean flow of greater than 5,000 l/s. A flow of 1,000 l/s is 53% of MALF (which is substantially lower than many rivers in Otago) and

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				<p>will result in flows in the lower river reaches that are still 250-350 l/s below the point of inflection for juvenile brown trout in this river.</p> <ul style="list-style-type: none"> • A minimum flow of 1,000 l/s recognises the dry nature of the catchment, existing land use, and the need for some surface water abstraction to continue for those who do not have access to an alternative supply. • A minimum flow of 1,000 l/s would be sufficient to maintain the natural character throughout the lower river reach. • The S32 Evaluation Report does not adequately examine the appropriateness of the minimum flow for achieving the objectives, or alternatives for achieving the objectives, nor does it appropriately recognise the importance of environmental protection and an adequate minimum flow as a core element of sustainable management.
Fish and Game Council	54	Amend	Amend the summer minimum flow season from 1 October to 31 May to 1 October to 30 April.	<ul style="list-style-type: none"> • Trout and other freshwater fish require a higher flow in order to return to the river from the mainstem Clutha to spawn during the winter. • A winter minimum flow season beginning on 1 May is the often-used beginning date in Otago plans and resource consents for the beginning of the freshwater sports fish spawning season. • The proposed eight month summer low flow period risks a potential flat-line, with resultant detrimental effects on the river ecosystem, such as the growth of nuisance algae. • The proposed summer minimum flow (1 October to 31 May) of 750 l/s: <ul style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS, Otago's Conservation Management Strategy, the draft Otago Conservation Management Strategy and the Sports Fish and Gamebird Management Plan of Otago.
Federated Farmers - High Country	55	Amend	Adopt option 2, the summer minimum flow of 450 l/s at the existing Ardgour monitoring site.	<ul style="list-style-type: none"> • Accepts that the status quo is unsustainable. • The NPSFM requires ORC to address over-allocation and this can only be achieved through the implementation of some greater level of control. • Reconsideration of the listed costs and benefits of the considered options by the submitter results in changing the balance of the evaluation towards option 2 being the optimum choice. • Landholders are expected to carry the brunt of the changes, but, as a partial contributor to the problem, decision-makers have a moral responsibility to alleviate the burdens of any change as far as it is within their power. • Systemic failure in structuring the S32 analysis provides for considerable doubt about the resultant recommendation, the validity of the benefits of a 750 l/s summer minimum flow and the adequacy of the assessment of the economic costs associated with this option.
Lindis Catchment Group Inc	56	Amend	Amend to a minimum flow of 450 l/s with an implementation date of 2026.	<ul style="list-style-type: none"> • Irrigators who will be subject to the proposed minimum flow would be significantly adversely affected socially and economically as a result of factors including reduced

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>water availability and reliability of supply, and resultant challenges for all decisions about farming operations, including investment in more efficient irrigation systems. As a result, the community connected to the Lindis catchment area would also be significantly adversely affected socially and economically.</p> <ul style="list-style-type: none"> • Flows in the Lindis River currently get as low as approximately 200 l/s at the Ardour Road monitoring site. • The setting of the proposed minimum flow of 750 l/s (1 October to 31 May) has not been informed by the best available information and scientific and socio-economic knowledge and fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • A minimum flow of 450 l/s from 1 October to 31 May (with an implementation date of no earlier than 2026) could enable people and communities to provide for their social and economic well-being while also achieving all other aspects of the purpose of the RMA, meeting the objectives and policies of the NPSFM, RPS, PRPS and RPW. • A minimum flow of 450 l/s from 1 October to 31 May (with an implementation date of no earlier than 2026) represents a significant improvement to the maintenance and enhancement of values associated with the Lindis when compared to the status quo.
Lindis Catchment Group Inc	56	Amend	Amend to a minimum flow of 450 l/s (1 October to 31 May) with an implementation date of 2026.	<ul style="list-style-type: none"> • Irrigators are required to make substantial changes to replace their deemed permits or water permits under the RMA and the existing provisions of the RPW, including increasing their efficiency of use. This will require significant changes to and investment in, irrigation and distribution systems both on- and off-farm. • No feasible timeframe and clear process for irrigators to transition to new permits with conditions imposing a minimum flow regime and a new primary allocation limit. • The lack of a feasible transition period and process does not recognise the complexity and challenges of all of these changes and the significant economic effects on irrigators that will result from these changes. • The proposed timeframe fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • An implementation date of no earlier than October 2026 for the minimum flow and primary allocation regime would enable irrigators to replace deemed permits and water permits, change their systems and comply with a minimum flow regime in a coordinated, realistic and achievable manner. It would allow a range of other river management options and changes to irrigation systems to be considered and implemented which would maintain and enhance the values associated with the Lindis River. • The inclusion of longer timeframes, as requested, is consistent with the NPSFM.
Federated Farmers of New Zealand	57	Amend	<p>That under Schedule 2A, for the Lindis River Catchment, a primary allocation minimum flow is adopted as follows:</p> <ul style="list-style-type: none"> • 450 l/s October to May 	<ul style="list-style-type: none"> • Prior to April 2015, all ORC documentation, presentations, workshop commitments and scientific reports were prefaced around a primary allocation minimum flow of 450 l/s being required. • Based upon the evaluation of the April 2014 Consultation Draft S32 Report a

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			<ul style="list-style-type: none"> • 1,600 l/s June to September. 	<p>minimum flow of 450 l/s should still be considered appropriate.</p> <ul style="list-style-type: none"> • Following over 5 years of advice and information that the catchment required a minimum flow of 450 l/s, landowners invested to adapt practices and invest in infrastructure and technologies in an endeavour to meet the proposed flows. • Through changing the recommended minimum flow from 450 l/s to 750 l/s, ORC has stymied any opportunity for landowners to continue their existing businesses. • To be in line with ORC's own science, reports and evaluations over a 7-year period.
Michael and Felicity Hayman	58	Amend	Provide a minimum flow of 450 l/s.	<ul style="list-style-type: none"> • The proposed very high minimum flow will result in an unreliable water supply. • Proposed development of our property requires capital expenditure which is only viable with a reliable water supply. • A minimum flow level of 450 l/s would result in a more reliable water supply while leaving an adequate flow of water in the Lindis River.
Justin and Tui Wilson	59	Amend	Go back to the original proposal of 450 l/s.	<ul style="list-style-type: none"> • At present the minimum flow is 200 l/s so there would be 250 l/s no longer used for irrigation. • The Lindis is alive and well all year round from the upper Ardour bridge where we can all enjoy swimming, fishing and kayaking.
Gordon Lucas	60	Amend	Support Lindis Catchment Group request for 450 l/s.	<ul style="list-style-type: none"> • At a 750 l/s minimum flow there are too many days of water rationing, making it uneconomic to put in spray irrigators. • A 750 l/s minimum flow would make it uneconomic to invest in expensive spray irrigation as there would be too many days of no watering. • At a 450 l/s minimum flow, with careful management of restrictions, there would be much more confidence to invest in efficient irrigation systems. Submitter has already invested a huge amount in pivot irrigation, for guaranteeing good winter feed crops, which has made a huge difference for the property and those who live and work here. A 450 l/s minimum flow would provide for reliable water to grow winter feed. • Reliable water is needed to farm economically, as farmers are at the bottom of the heap in paying costs for pest and weed control, district and regional council rates and many more bureaucratic costs. • Autumn store price for finished lambs doesn't pay for the above costs, but reliable water produces better prices. • "Customary rights" must also apply to the farming generations over 100+ years, and others will have bought land in the knowledge there was a water right with it. • There are many lows and some highs in the commodity market and very dry and extreme dry years. Shudders to think of future generations facing poor prices and dry conditions, and watching Lindis water flowing out to the Clutha, gone for good, for a few introduced species of fish. This would not be good for farmers' mental health or the health of the wider community.
Lesley Lucas	61	Amend	Support the summer minimum flow of 450 l/s.	<ul style="list-style-type: none"> • Allows 250 l/s above the present 200 l/s "minimum flow". • A minimum flow of 750 l/s will provide hardship for many users of the Lindis. • For peace of mind for farmers to guarantee crops in this low rainfall area. • Submitter retired blocks of sunny country, under an Otago Catchment Board farm plan, for vegetation regeneration with oversowing and top-dressing, which vastly

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>improved water retention.</p> <ul style="list-style-type: none"> • Guaranteed water for irrigation diminishes risks and gives economic peace of mind. Good land management makes for a stronger economic unit, allows pest and weed control, and provides employment, to strengthen the Tarras community. • Access to a reliable small amount of water is a vital part of our overall extensive high country farming practice. • A monitored 450 l/s minimum flow is adequate to provide recreational use, good fish habitat and maintain a healthy Lindis River that all can enjoy. • More than half of Tarras residents are connected with farming activities or rely on Lindis river water for domestic or gardens.
Wanaka Agricultural Contracting	62	Amend	Support the Lindis Catchment Group's recommendation (submitter 56) on minimum flows.	Supports the Lindis Catchment Group's decision requests for minimum flow, for job security and long term expansion within the industry.
New Zealand Professional Fishing Guides Association	63	Amend	Improved summer minimum flow of at least 1,000 l/s.	<ul style="list-style-type: none"> • Submitters use the river when flows are maintained to the Clutha River but when flows are low, the river becomes unusable and an unsustainable habitat for the fish in the Lindis River. • The Lindis River has been mismanaged flow-wise for many years. • Consider the Lindis River to have good potential as a fishery if the flow regime is sustainable. • Guided fishing is worth approximately \$1,200/day to the region. The river has the potential to keep more guided days within the Otago Region.
Donald Wallace	64	Amend	Support the option of 1,000 l/s.	<ul style="list-style-type: none"> • Appalled at the lack of water in the lower river over summer months for 50+ years, attributable to excessive irrigation. • The deadline of 2021 for alternatives for irrigation needs has been known for 30 years. • Need to return to a sustainable summer flow, with good water quality, cooler temperatures, restore natural character and support fish.
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Amend	Amend to 1,000 l/s, and the season to be 1 October to 30 April.	<p>Proposed minimum flow:</p> <ol style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy. <ul style="list-style-type: none"> • The Section 32 Evaluation Report does not adequately examine the appropriateness of the minimum flow for achieving the objectives, or alternatives for achieving the objectives, nor does it appropriately recognise the importance of environmental protection and an adequate minimum flow as a core element of sustainable management.
J. Murray Neilson	66	Amend	The minimum flow at the Ardgour Road flow recorder should be 1,000 l/s, or higher, from 1 October to 30 April.	<ul style="list-style-type: none"> • ORC must set an environmental flow for the Lindis which meets NPSFM objectives, in particular B1, B2 and B3. • ORC <u>must</u> provide for the compulsory values, <u>may</u> provide for other national values or other values, <u>while</u> considering impacts on local communities and people (emphasis added). Addressing environmental matters and over-allocation come first; everything else is secondary but can be provided for <u>while</u> meeting those objectives.

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				<ul style="list-style-type: none"> • For the life-supporting capacity of the lower Lindis and its braided natural character, a continuous flow is required. • The Opus reports notes that the demand for large volumes of irrigation water quickly exceeds the capacity of the low flow regime, irrespective of the level of the minimum flow, with the potential effects of a minimum flow of 900 l/s being generally not very different from those at 450 l/s. • The Section 32 Evaluation Report states that natural fluctuation in environmental conditions cause a greater impact on water availability than the <u>proposed</u> minimum flow, but submitter argues this would be true for any minimum flow from 450 l/s to 900 l/s. • Combined expert opinion behind a draft NESEFWL recommended a minimum flow of 80% MALF. A minimum flow of 1,000 l/s is less than this expert recommendation but recognises the use of water for irrigation where there is no alternative source, while providing for natural character, nesting birds and connection with the Clutha/Mata-Au.
Brian Turner	67	Amend	Ensure more than adequate flow throughout the catchment, throughout the year, to guarantee good water quality, enhance the natural character and values, provide for recreational users and for healthy populations of fish, and so on.	<ul style="list-style-type: none"> • The recommended minimum flow is too low. • Irrigators continue to be pandered to, while they have had years of opportunity to provide for available and accessible alternative water sources. • Water should not continue to be treated principally as a utility/resource dominated by commercial interests, but as an essential part of the living community of nature. • Council has a duty to set measures to reverse the situation
Central Otago Environmental Society Inc.	68	Amend	Adopt a minimum flow of 1,500 l/s (October to May) being 80% of MALF as proposed by the Draft NESFSWL.	<ul style="list-style-type: none"> • The ORC's declared objective is to maintain and enhance the quality of the Region's water resources. It follows that where potential risk is identified or doubt as to the outcome is identified, prudence should prevail. With regard to the Lindis, the minimum flow must be established at a level which ensures positive environmental outcomes. • Opposes 750 l/s because: <ul style="list-style-type: none"> a) Of uncertainty as to whether water quality will be improved; b) It puts at risk in-stream values below the SH8 bridge; c) It fails to provide fish habitat downstream from the SH8 bridge; d) It reflects an unnecessary concession to present land use practices. • The economic impact of a higher minimum flow is likely to be minimal (5% +/-) and will further encourage land use change and the implementation of sustainable agricultural practices, all developments which are legitimate and desirable outcomes. • Acknowledges the necessity to provide water for food production, supports the concept of water storage against dry years and advocates the development and implementation of sustainable, ecosystem-based farming practices which address environmental threats and improve the overall quality of the environment.
Beau Trevathan	69	Amend	Amend to a lower minimum flow during 1 October to 31 May.	<ul style="list-style-type: none"> • Irrigators who will be subject to the proposed minimum flow would be significantly adversely affected socially and economically, including for the following reasons: • The amendment sought (setting a lower minimum flow in Schedule 2A for 1 Oct to 31 May) would enable people and communities to provide for their social and economic well-being while also meeting all legislative requirements focusing on

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>protecting natural and iwi values.</p> <ul style="list-style-type: none"> • A minimum flow of 750 l/s will create uncertainty in economic use of small properties and over-capitalising and operating costs exceeding the value of returns which will lead to land use changes away from a form that supports the region's economy.
Lynne McCall	71	Amend	Adopt a minimum flow of 450 l/s.	Community relies on farmers. Without sufficient water for irrigation, farming will not prosper, nor will employment in the area.
Geordie Hill Station Ltd	72	Amend	Adopt a minimum flow of 450 l/s (1 Oct to 31 May).	<ul style="list-style-type: none"> • A minimum flow of 750 l/s takes away too much reliable irrigation water. • The farmer and community would bear significant economic and social consequences that are out of proportion to the benefits of the higher minimum flow. • The proposed minimum flow fails to achieve the purpose of the RMA, RPS and plans. • ORC has failed to properly and accurately carry out an evaluation of the proposal in accordance with RMA S32. • Concerned at lack of consideration and respect shown by ORC during consultation, for local opinions, heritage and social/economic values, while too much weight has been given to the opinions of those from outside the area, who do not share the locals' history. • Locals bear the harsh direct impact of proposed PPC5A. • For a significant period, locals were led to believe the minimum flow would be 450 l/s, and found out later by chance the ORC had other thoughts.
Forest Range Ltd, R.S. Emmerson Trust	73	Amend	Adopt the original proposal for 450 l/s flow.	<ul style="list-style-type: none"> • Present minimum flow is 200 l/s, so 450 l/s would allow another 250 l/s that is no longer used by irrigation. • Lindis River is in good heart and there is no evidence it would naturally flow to the Clutha/Mata-Au. • Many of the Lindis' tributaries often run underground with sufficient water in their upper catchments supplying the Lindis. • Significant investment has been made in conservation measures. This should give submitter some right to irrigate from Lindis. • Fish life abounds and spawning trout are often seen in the upper catchment. Fish numbers are affected by predatory birds. • Providing a habitat for introduced fish should not take precedence over the financial stability of the district.
Forest Range Ltd, Lindis Trust	74	Amend	Adopt the original proposal for 450 l/s flow.	<ul style="list-style-type: none"> • Present minimum flow is 200 l/s, so 450 l/s would allow another 250 l/s that is no longer used by irrigation. • Lindis River is in good heart and there is no evidence it would naturally flow to the Clutha/Mata-Au. • Many of the Lindis' tributaries often run underground with sufficient water in their upper catchments supplying the Lindis. • Significant investment has been made in conservation measures. This should give submitter some right to irrigate from Lindis. • Fish life abounds and spawning trout are often seen in the upper catchment. Fish numbers are affected by predatory birds.

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				<ul style="list-style-type: none"> • Providing a habitat for introduced fish should not take precedence over the financial stability of the district.
Gregor McKenzie	75	Amend	Minimum flow of at least 1,000 l/s, at Ardgour Road flow recorder.	<ul style="list-style-type: none"> • A minimum flow of 1,000 l/s ensures a meaningful flow in the lower river, good water quality, cooler temperatures, restore the natural character, amenity and fishery values. • A minimum flow of 1,000 l/s 1,000 l/s represents a considerable concession to irrigators, given the draft NESEFWL recommends a minimum flow of 80% of MALF for this size of river. • Alternative water sources are available, and are being invested in, because the RPW is clear that any alternative source should be used in over-allocated catchments.
Contact Energy Ltd	76	Amend	Amend Schedule 2A as follows: (struckthrough text indicates text to be deleted; underlined text indicates text to be added): Minimum flow (litres per second - instantaneous flow): 750 (1 October <u>September</u> to 340 May <u>April</u>)	Suggested amendment to the summer flow period should reflect the recognised irrigation demand periods (as reflected in recent resource consent conditions and Schedule 4B.2).
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, and Te Runanga o Otakou (collectively Kai Tahu)	77	Amend	Require a minimum flow of 1,000 l/s from October to May.	<p>A minimum flow of 1,000 l/s:</p> <ol style="list-style-type: none"> a) recognises and provides for Kai Tahu relationship with the Lindis River and for the cultural values, beliefs, uses and traditions identified for the Lindis River (including continuity of flow; integrated management; variability of flow; mahika kai; kaitiakitaka; recreational use and wahi tupuna (ancestral landscape); b) provides 54% of the natural 7-day MALF of the Lindis River, and achieves an appropriate balance between cultural values, instream values, and economic uses in the catchment; c) enables Kai Tahu to express mana and meet obligations as kaitiaki; d) ensures the quality and quantity of the Lindis is sufficiently high to protect its mauri (life-force) particularly in the lower and middle reaches; e) ensures continuous flow throughout the entire length of the Lindis River, with approximately 500 l/s remaining in the river at the Clutha/Mata-au confluence; f) provides 91% of the habitat available for longfin eel at MALF; g) ensures consistency with the NPSFM, the Te Runanga o Ngai Tahu Freshwater Policy, and the Kai Tahu ki Otago Natural Resource Management Plan; and h) achieves the purpose of the RMA.
Wayne and Billee Marsh	78	Amend	Increase the l/s minimum flow to guarantee there will be 'no risk to the ecosystem downstream from the SH8 bridge'.	<p>A minimum flow of 900 l/s would:</p> <ol style="list-style-type: none"> a) achieve that there is no risk to the ecosystem downstream of the SH8 bridge; b) allow vital and substantial ecological gain, while the economic loss is minor; c) uphold the objectives of the NPSFM; d) uphold the spirit and ideals of the Tarras Community Plan 2007 (which recognised the importance of the Lindis' amenity and ecosystem values to the Tarras community, and recommended the development of a long-term strategy for an irrigation scheme to take water from the Clutha/Mata-Au); and e) enable continuous flow in the Lindis River.
T J Cooke	79	Amend	A summer minimum flow of 450 l/s.	<ul style="list-style-type: none"> • A minimum flow of 750 l/s causes too much hardship • Instream life benefits greatly at 450 l/s, as it is 250 l/s more than is already there at

Name	Number	Position	Decision Requested	Reason for Decision Requested
				very low flow times.
Lindis Irrigation Ltd	80	Amend	Amend to a minimum flow of 450 l/s (1 October to 31 May) with an implementation date of 2026.	Irrigators subject to the proposed minimum flow and shareholders connected to the Lindis catchment would be significantly adversely affected socially and economically as a result of factors including: a) reduced water availability; b) reduced reliability of supply; and c) resultant challenges for all decisions about farming operations, including investment in more efficient irrigation systems.
Cromwell Rod and Gun Club	81	Amend	Support an improved summer minimum flow of at least 1,000 l/s.	<ul style="list-style-type: none"> • Like to see the whole ecosystem in the river restored, not just for trout. • Dislike seeing the river with zero flow for much of the summer months.

7 Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation

Name	Number	Position	Decision Requested	Reason for Decision Requested
Ella Lawton	15	Support	The winter minimum flow is supported.	No reason given.
Johnny Mauchline	16	Support	The winter minimum flow is supported.	The river is an excellent fishery and fishing the river brings benefits to the local economy.
Upper Clutha Angling Club	43	Support	Support.	Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.
Malvern Downs Ltd	47	Support	Adopt under Schedule 2A, for the Lindis River Catchment, a primary allocation minimum flow as follows: 1,600 l/s June to September.	This is in line with ORC's own science, reports and evaluations over a 6-7 year period.
Environmental Defence Society Incorporated	50	Amend	Amend the winter minimum flow season from 1 June to 30 September to 1 May to 30 September.	Support for the winter minimum flow of 1,600 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
Fish and Game Council	54	Amend	Amend the winter minimum flow season from 1 June to 30 September to 1 May to 30 September.	<ul style="list-style-type: none"> • Trout and other freshwater fish require a higher flow in order to return to the river from the mainstem Clutha to spawn during the winter. • A winter minimum flow season beginning on 1 May is the often-used beginning date in Otago plans and resource consents for the beginning of the freshwater sports fish spawning season. • The proposed eight month summer low flow period risks a potential flat-line, with resultant detrimental effects on the river ecosystem, such as the growth of nuisance algae. • The proposed winter minimum flow (1 June to 30 September) of 1,600 l/s: <ul style="list-style-type: none"> a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS, Otago's Conservation Management Strategy, the draft Otago Conservation Management Strategy and the Sports Fish and

Name	Number	Position	Decision Requested	Reason for Decision Requested
				Gamebird Management Plan of Otago.
Fish and Game Council	54	Support	Support the winter minimum flow of 1,600 l/s, conditionally.	Support for the winter minimum flow of 1,600 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
Lindis Catchment Group Inc	56	Support	Retain as proposed.	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Support	Amend the winter minimum flow season from 1 June - 30 September to 1 May - 30 September.	Proposed minimum flow: a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy.
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Support	Conditional support.	Support for the winter minimum flow of 1,600 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
Central Otago Environmental Society Inc.	68	Support	Support the winter minimum flow.	Welcomes the establishment of minimum flows and maximum allocations on the Lindis River as a potential exemplar which might be used to reinstate year-round flows in other Otago streams and tributaries which, in drought years, are diverted to maintain farm irrigation supplies.
Contact Energy Ltd	76	Amend	Amend Schedule 2A as follows: (struckthrough text indicates text to be deleted; underlined text indicates text to be added): Minimum flow (litres per second - instantaneous flow): 1,600 (1 June May to 30 September August.	Suggested amendment to the winter flow period should reflect the recognised irrigation demand periods (as reflected in recent resource consent conditions and Schedule 4B.2).
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, and Te Runanga o Otakou (collectively Kai Tahu)	77	Support	Support 1,600 l/s (1 June to 30 September) minimum flow at Ardour Road.	Recognises and provides for Kai Tahu relationship with the Lindis River and for the cultural values, beliefs, uses and traditions identified for the Lindis River.

8 Schedule 2A - Primary allocation limit

Name	Number	Position	Decision Requested	Reason for Decision Requested
Ella Lawton	15	Support	The primary allocation limit is supported.	No reason given.
Johnny Mauchline	16	Support	The primary allocation limit is supported.	The river is an excellent fishery and fishing the river brings benefits to the local economy.
The Point Partnership	22	Amend	Amend to a higher primary allocation limit of 1,500 l/s.	<ul style="list-style-type: none"> The proposed primary allocation limit will result in reduced water availability and does not accurately represent the history of use within the catchment, and what could be irrigated efficiently with this water. The proposed primary allocation limit will result in the following adverse social and economic effects. A cut from the current position of approx 4,500 l/s to 1,000 l/s is extreme and punitive.

Name	Number	Position	Decision Requested	Reason for Decision Requested
Gerald Telford	28	Amend	Set a primary allocation of 1,500 l/s (being appreciably less than existing).	<ul style="list-style-type: none"> • Provides a pathway to balance enhanced river low flow and ensures continued farming with efficient water practices. • Many water users have invested in more reliable water sources that offer better long term investment outcomes. This makes more water from the Lindis River available to water users that do not have access to an alternative water source. Users with no alternative water source must use water wisely and to provide for the best outcomes of the whole community. • The livelihoods of the members of the Lindis Catchment Group are connected to the river flows and with this comes the responsibility to all users both commercial and recreational. • The Lindis Catchment Group can continue under new and better practice to draw the water deemed necessary to support their agricultural operations and believes the increased flows outlined by the group will have considerable benefit for the continued health of the present fishery. • No one owns the water; it belongs to the community, locally and nationally.
Rebecca McElrae	30	Amend	Set primary allocation of 1,500 l/s.	To more accurately align with current primary block.
Adam Spiers	32	Amend	Have a primary allocation block of 1,500 l/s.	<ul style="list-style-type: none"> • The current primary allocation block is 4,000 l/s. • There is no merit in squeezing the primary allocation block down as low as 1,000 l/s and giving current irrigators even more uncertainty about the value of their permits.
John Davis	33	Amend	The primary allocation limit of 1,000 l/s should be raised to a more sensible and reasonable level of 1,500 l/s.	To more fairly reflect past history and allow for that water to be used more efficiently.
Cloudy Peak Ltd	39	Amend	Have a primary allocation block of 1,500 l/s	<ul style="list-style-type: none"> • The current primary block is 4,000 l/s. • There is no merit in squeezing the primary block down as low as 1,000 l/s and giving current irrigators even more uncertainty about the value of their permits.
J.C.A Lucas	42	Oppose	The primary allocation limit is opposed.	The Tarras district relies on irrigation to maintain farming production, population and services.
Upper Clutha Angling Club	43	Support	Support.	Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.
Bruce Jolly	46	Amend	The primary allocation limit should be in the 1500 l/s to 1,600 l/s range.	<ul style="list-style-type: none"> • The proposed primary allocation limit is too far away from anything that it will get down to. • A suggested primary allocation limit in the 1,500 to 1,600 l/s range better reflects the area of land irrigated and volumes of water used.
Malvern Downs Ltd	47	Amend	Adopt a primary allocation limit of 1,500 l/s, rather than the only other option (1,000 l/s) considered.	A primary allocation limit of 1,500 l/s is more workable and appropriate.
Environmental Defence Society Incorporated	50	Support	Support the primary allocation limit of 1,000 l/s, conditionally.	<ul style="list-style-type: none"> • The proposed primary allocation limit of 1,000 l/s is slightly higher than the default limit set by Policy 6.4.2 of the RPW. • Support for the primary allocation limit of 1,000 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.

Name	Number	Position	Decision Requested	Reason for Decision Requested
Peter William Jolly	52	Amend	Amend to a higher primary allocation limit.	The proposed limit creates too much uncertainty around water reliability and will have a detrimental effect on the economics of investment in upgraded irrigation systems.
Tim Davis	53	Amend	Recommend a primary allocation limit agreed between Lindis Catchment Group and ORC.	<ul style="list-style-type: none"> A change in the point of takes, plus a reduction in demand from 2,700 l/s to somewhere in the vicinity of 1,500 l/s, will provide similar and possibly more benefits to the values of the river, at less costs for water users, than that of a draconian minimum flow. The primary allocation limit should be raised to a level that allows all deemed permits to be renewed as per current rules around volume, efficiency and alternative sources.
Fish and Game Council	54	Support	Support the primary allocation limit of 1,000 l/s, conditionally.	<ul style="list-style-type: none"> The proposed primary allocation limit of 1,000 l/s is slightly higher than the default limit set by Policy 6.4.2 of the RPW. Support for the primary allocation limit is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
Lindis Catchment Group Inc	56	Amend	Amend to a primary allocation limit of 1,500 l/s.	<ul style="list-style-type: none"> The proposed primary allocation limit does not represent historic water use within the catchment, and what could be irrigated efficiently with this water. The current primary allocation is 4,003 l/s, of which approximately 2,700 l/s is used. The proposed primary allocation limit will result in a harsh reduction in water availability and will result in significant adverse economic and social effects on irrigators and the community connected to the Lindis catchment. The economic and social effects of the proposed primary allocation limit will be exacerbated by a range of factors including the reduction in water available for irrigation due to the adoption of a minimum flow and potentially having to obtain water takes from an alternative source. The setting of the proposed allocation limit of 1,000 l/s has not been informed by the best available information and scientific and socio-economic knowledge and fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. The amendment sought could enable people and communities to provide for their social and economic wellbeing while also achieving all other aspects of the purpose of the RMA, meeting the objectives and policies of the NPSFM, RPS, PRPS and RPW.
Federated Farmers of New Zealand	57	Amend	<ul style="list-style-type: none"> Adopt a more workable and appropriate primary allocation limit of 1,500 l/s. If this is rejected, undertake meaningful and constructive engagement with landowners to determine the appropriate primary allocation limit. 	<ul style="list-style-type: none"> A primary allocation limit of 1,000 l/s will result in a harsh reduction in water availability and significant adverse economic and social effects. A primary allocation limit of 1,000 l/s does not represent the history of use within the catchment; neither does it appropriately represent what could be irrigated efficiently with this water. No assessment of how the proposed primary allocation limit has been linked to the minimum flow, and how these will effectively work 'together'. A primary allocation limit of 1,500 l/s is more appropriate and could more effectively enable people and communities to provide for their social and economic

Name	Number	Position	Decision Requested	Reason for Decision Requested
				well-being while enabling environmental objectives to be met.
Michael and Felicity Hayman	58	Amend	Provide a primary allocation of 1,500 l/s.	Proposed development of our property requires capital expenditure which is only viable with a reliable water supply.
Gordon Lucas	60	Amend	Increase primary allocation limit to 1,500 l/s.	To better represent primary water access.
Lesley Lucas	61	Amend	Provide a more reasonable allocation of 1,500 l/s.	Allows more primary water access.
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Support	Conditional support.	Support for the primary allocation limit of 1,000 l/s is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
Central Otago Environmental Society Inc.	68	Support	Support the primary allocation limit.	Welcomes the establishment of minimum flows and maximum allocations on the Lindis River as a potential exemplar which might be used to reinstate year-round flows in other Otago streams and tributaries which, in drought years, are diverted to maintain farm irrigation supplies.
Beau Trevathan	69	Amend	Amend to a higher primary allocation limit.	<ul style="list-style-type: none"> The proposed primary allocation limit will result in reduced water availability and does not accurately represent the history of use within the catchment, and what could be irrigated efficiently with this water. The amendment sought (a higher primary allocation limit) would enable people and communities to provide for their social and economic well-being while also meeting all legislative requirements focused on protecting natural and iwi values.
Lynne McCall	71	Amend	Adopt a primary allocation of 1,500 l/s.	There is a lack of meaningful consideration of economic and social effects on the district.
Geordie Hill Station Ltd	72	Amend	Primary allocation should be 1,500 l/s.	<ul style="list-style-type: none"> A primary allocation limit of 1,000 l/s is too little water in relation to the land which is currently irrigated. Tarras has a long history of irrigation and its community need to retain that basis. Both the primary allocation and the minimum flow determine availability of reliable irrigation water. Lindis provides economic and traditional water to sustain traditional sheep and beef farming.
Forest Range Ltd, R.S. Emmerson Trust	73	Amend	Increase primary allocation limit to 1,500 l/s.	A primary allocation limit of 1,500 l/s aligns more accurately with current primary allocation.
Forest Range Ltd, Lindis Trust	74	Amend	Increase primary allocation limit to 1,500 l/s.	A primary allocation limit of 1,500 l/s aligns more accurately with the current primary allocation.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, and Te Runanga o Otakou (collectively Kai Tahu)	77	Support	Support a primary allocation limit of 1,000 l/s.	A primary allocation limit of 1,000 l/s recognises and provides for Kai Tahu relationship with the Lindis River and for the cultural values, beliefs, uses and traditions identified for the Lindis River (including continuity of flow; integrated management; variability of flow; mahika kai; kaitiakitaka; recreational use and wahi tupuna (ancestral landscape), and better achieves the purpose of the RMA.
T J Cooke	79	Amend	Accept a primary allocation limit of 1,500 l/s.	A primary allocation limit of 1,500 l/s more accurately aligns with the current primary allocation block.

35 Schedule 2B – Supplementary allocation regime

Name	Number	Position	Decision Requested	Reason for Decision Requested
Ella Lawton	15	Support	The supplementary regime is supported.	No reason given.
Johnny Mauchline	16	Support	The supplementary allocation regime is supported.	The river is an excellent fishery and fishing the river brings benefits to the local

Name	Number	Position	Decision Requested	Reason for Decision Requested
Upper Clutha Angling Club	43	Support	Support.	economy. Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.
Malvern Downs Ltd	47	Support	Adopt Option 2 of the 'Options for managing surface water in the Lindis Catchment'	This is in line with ORC's own science, reports and evaluations over a 6-7 year period.
Environmental Defence Society Incorporated	50	Support	Support the supplementary allocation regime, conditionally.	<ul style="list-style-type: none"> The proposed supplementary flows are more permissive than the default regime. Submitter is conditionally supportive of this to enable harvesting to occur to encourage irrigators to lessen their reliance on primary allocation from the Lindis. Support for the supplementary allocation regime is conditional upon the summer minimum flow being raised to 1,000 l/s, the summer minimum flow season amended to 1 October to 30 April, and subsequent amendments to the winter minimum flow season.
Fish and Game Council	54	Support	Support the supplementary regime, conditionally.	<ul style="list-style-type: none"> The proposed supplementary flows are more permissive than the default regime, but enable harvesting to occur to encourage irrigators to lessen their reliance on primary allocation from the Lindis. Support for the supplementary regime is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
Lindis Catchment Group Inc	56	Support	Retain as proposed.	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Support	Conditional support.	Support for the supplementary regime is conditional upon the summer minimum flow being raised to 1,000 l/s and the summer minimum flow season being amended to 1 October to 30 April.
Central Otago Environmental Society Inc.	68	Support	Support the supplementary allocation regime.	Welcomes the establishment of minimum flows and maximum allocations on the Lindis River as a potential exemplar which might be used to reinstate year-round flows in other Otago streams and tributaries which, in drought years, are diverted to maintain farm irrigation supplies.
Department of Conservation	70	Support	Retain as notified.	<ul style="list-style-type: none"> Support proposed minimum flows and allocation limit for first and second supplementary blocks for the Lindis. These will safeguard the life-supporting capacity of Lindis aquatic resources and sustain its fishery values.
Contact Energy Ltd	76	Amend	Amend Schedule 2B as follows: (struckthrough text indicates text to be deleted; underlined text indicates text to be added): 1 May to 30 November: 2200 Ardgour Road (MS 17) 1 December to 30 April: 1600 Ardgour Road (MS 17) 1 May to 30 November: 2700 Ardgour Road (MS 17) 1 December to 30 April: 2100 Ardgour Road (MS 17)	So that the dates are specific.

Name	Number	Position	Decision Requested	Reason for Decision Requested
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, and Te Runanga o Otakou (collectively Kai Tahu)	77	Support	Support the supplementary allocation regime and the associated minimum flows.	No reason given.

15 Schedule 2A and 2B - Monitoring site

Name	Number	Position	Decision Requested	Reason for Decision Requested
Bruce Jolly	46	Support	The monitoring site is supported.	No reason given.
Lindis Catchment Group Inc	56	Support	Retain as notified.	No reason given.

5 Policy 6.4.5, including transition timeframes

Name	Number	Position	Decision Requested	Reason for Decision Requested
The Point Partnership	22	Amend	Include a longer transition period in this policy - to 2026 instead of 2021.	<ul style="list-style-type: none"> Including the Lindis catchment in the existing paragraph (c) of this policy means the timeframes outlined in the explanation to the policy would apply to the Lindis catchment. This will result in a lack of a feasible transition period for irrigators to adjust to the minimum flow regime and primary allocation limit, change to more efficient irrigation systems and potentially transfer water rights to an alternative source. Until we know the minimum flow conditions, the amount of water allocated to us in the consent renewal process and the total primary allocation on the river we cannot begin to design, arrange, finance and construct a new efficient system.
Gerald Telford	28	Amend	Provide a fair transition time to make necessary changes.	Provides a pathway to balance enhanced river low flow and ensures continued farming with efficient water practices.
Rebecca McElrae	30	Oppose	Provide longer timeframe for change; 2026 till minimum flow applies.	<ul style="list-style-type: none"> Lack of transition rules to assist the change. Much has to be done that requires cohesion, money, time, access, etc.
Bendigo Station	31	Did not specify	Provide a flexible timeframe.	There is a lack of transition time rules and the timeframes are inflexible.
Adam Spiers	32	Amend	Any minimum flow applied to take effect no sooner than 2026.	<ul style="list-style-type: none"> The cost to irrigators of the required efficiency improvements and sourcing from alternative sites (engineering, legal, negotiation, and regulatory) is huge. The time required for irrigators and community to adjust and form new groups and develop alternate plans is significant. The delay in ORC implementing the minimum flow has resulted in a significant burden of change on the community and it is already 2015.
John Davis	33	Amend	Provide an extended "lead in time".	<ul style="list-style-type: none"> People and the local community, who have been using Lindis water for generations, need extended "lead in time" to adjust to any minimum flow, as efficient methods of irrigation take time and money. Lindis irrigation, where able, will need to shift irrigation takes from gravity to pump and will need easements, intake requirements, energy requirements, as well as the full complement of on-farm adjustments, not to mention the availability of finance. All this will have to be carried out over multiple years after present permits

Name	Number	Position	Decision Requested	Reason for Decision Requested
				expire.
Cloudy Peak Ltd	39	Amend	Any minimum flow to take effect no sooner than 2026.	<ul style="list-style-type: none"> • The cost to irrigators of the required efficiency improvements and sourcing water from alternative sites (engineering, legal, negotiation, and regulatory) is huge. • The time required for irrigators and community to adjust and form new groups and develop alternate plans is significant. • The delay in ORC implementing the minimum flow has resulted in a significant burden of change on the community and it is already 2015.
J.C.A Lucas	42	Amend	For those properties with recently upgraded border dyke irrigation and family succession the time frame needs to be extended by at least 5 years.	<ul style="list-style-type: none"> • Lack of transition rules to assist the change. • For those properties with recently upgraded border dyke irrigation and family succession the time frame needs to be extended to lessen the financial burden for the younger generation.
Lindis Downs Ltd	45	Amend	Amend to include a longer transition Policy - extend to 2026.	Extension of the transition time needed to allow irrigators to set up more efficient irrigation systems without financial strain over a longer period of time. Water users need more time to adjust once the minimum flow is set.
Bruce Jolly	46	Amend	There needs to be a transition period between the expiry of deemed permits and the enforcement of the minimum flow.	With the change from Deemed Permits to RMA consents there will be a number of additional conditions, including changing of take points and distribution infrastructure to meet efficiency requirements. This will have an environmental benefit for the river.
Malvern Downs Ltd	47	Amend	Adopt an appropriate and realistic transitioning framework for the Lindis Catchment. This should enable an extension of minimum flows for at least 5 years post expiry of deemed permits (mining privileges) - at minimum until 2 October 2026.	Irrigators cannot invest in new irrigation systems and infrastructure as long as they don't know if their water rights will be renewed.
Peter William Jolly	52	Amend	Provide for a longer transition period.	Longer transition period required for farmers to assess the effect of any minimum flow so as to be confident that the available water will be reliable enough to make increased costs associated with alternative forms of irrigation economic.
Tim Davis	53	Amend	Insert a transition period to allow the catchment time to make necessary adjustments to their businesses, at the very least out to 2026.	No reason given.
Fish and Game Council	54	Amend	Add other objectives, policies, methods, rules, and schedules to the RPW, to address transitioning from deemed permits.	<ul style="list-style-type: none"> • Need to address the issue of transition from deemed permits to resource consents, regardless of water source. Transition matters include: <ol style="list-style-type: none"> a) Facilitating the shifting of deemed permits to resource consents from alternative sources; b) The potential for gravel management and extraction in locations where there are substantial deposits to restore surface flows; c) Changing methods of take to restore fish passage and prevent ingress of small fish and eelers; d) Providing for variable rates of take through consents to mimic flushing flows and to enable the fine-tuning of water management. e) Providing certainty and a process to facilitate the fair break-up and reallocation of large deemed permits held by existing irrigation companies into individual or smaller components. • The S32 Evaluation Report does not adequately address matters of transition. It

Name	Number	Position	Decision Requested	Reason for Decision Requested
				only addresses transition times under RPW Policy 6.4.5. The topic of transition from deemed permits to resource consents is wider.
Federated Farmers - High Country	55	Support	<ul style="list-style-type: none"> • Extend the policy completion date to 31 December 2030 so that all factors can be fully analysed and introduced to the optimum effect. • Enter meaningful and constructive negotiation with affected landholders and other stakeholders to formulate a policy as to how a summer minimum flow of 450 l/s can be best effected, bearing in mind, and clearly evaluating, the effects that any management regime will have on the community, the economy and the environment. 	<ul style="list-style-type: none"> • Landowners accept that some changes are desirable for the ongoing benefit of all river users and have made long-term business decisions and investments based on the information provided by ORC during the initial consultation process during which ORC held preference for a summer minimum flow of 450 l/s. • Current mining privileges expire in October 2021, but the NPSFM provides for variations to these to be made from that date, unless prior agreement is reached between the ORC and the permit holders. • The NPSFM provides for a progressive implementation programme whereby a Regional Freshwater Management policy is to be fully completed by 31 December 2025 or 31 December 2030 if “meeting that date (31/12/25) would result in lower quality planning”. • Any implementation of the minimum flow prior to 31/12/2030 would result in lower quality planning insofar as it would lead to inefficient irrigation systems. • Implementing the minimum flow on 31/12/2030 would lessen the severe economic impact that the revised regime will have on many primary production businesses in the region and alleviate any adverse financial effect. • The consultation process that culminated in the final recommendation was not constructive. Constructive consultation did take place from 2009-2014, but many landholders would reject the suggestion that the meetings in 2015 could be described as “consultation”. The abrupt ending of consultation by ORC in 2015 when reversing its long held preference for option 2 precluded any chance of achieving a proposal acceptable to the wider community. • The S32 Evaluation Report is blatantly inadequate in many areas, offering some unsupported data to rationalise what appears to be a pre-conceived decision, rather than use data scientifically to reach a logical decision. It fails to meet the requirement to: <ul style="list-style-type: none"> a) Examine new proposals for their appropriateness in achieving the purpose of the RMA; b) Clearly identify and assess the benefits, costs and risks of new policies and rules on the community, the economy and the environment; and c) Document the analysis so stakeholders and decision-makers can understand the rationale for policy choices. • Many of the points raised in the S32 Evaluation Report are unsubstantiated and irrelevant, and data are used to give the impression of a minor adverse effect or to support a predetermined decision, rather than used scientifically to reach a logical decision.
Lindis Catchment Group Inc	56	Amend	Amend Policy 6.4.5 so that implementation of the minimum flow on Lindis River will not occur before October 2026, or include a package of provisions and amendments to existing provisions that provide an effective and appropriate transition period and	<ul style="list-style-type: none"> • Irrigators are required to make substantial changes to replace their deemed permits or RMA permits, and the existing provisions of the RPW, including increasing their efficiency of use. This requires significant changes to and investment in, irrigation and distribution systems both on- and off-farm, to adjust to the minimum flow and primary allocation regime.

Name	Number	Position	Decision Requested	Reason for Decision Requested
			process for replacing deemed permits and water permits.	<ul style="list-style-type: none"> • The proposed change to Policy 6.4.5 and the failure to provide for a transition package results in PPC5A not achieving the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM. • Inserting the Lindis catchment into Policy 6.4.5 will result in a lack of a feasible timeframe and clear process for irrigators to transition to new permits with conditions imposing a minimum flow regime and a new primary allocation limit. • The lack of a feasible transition period and process does not recognise the complexity and challenges of all of these changes and the significant economic effects on irrigators that will result from these changes. • An implementation date of no earlier than October 2026 for the minimum flow and primary allocation regime would enable irrigators to comply with a minimum flow regime in a coordinated, realistic and achievable manner. It would allow a range of other river management options and changes to irrigation systems to be considered and implemented which would maintain and enhance the values associated with the Lindis River. • The inclusion of longer timeframes is consistent with the NPSFM. • PPC5A does not include provisions that will allow for changes necessitated in farm management due to changed water availability and variability. • Development of a transition package of provisions (policies and rules) is needed to: <ol style="list-style-type: none"> a) recognise and reduce the complexity and challenges of all of these changes; b) minimise the adverse effects of these changes on irrigators; c) promote balanced betterment to the core values of the Lindis Catchment water; and d) provide a clear process, and appropriate timeframes, for an effective transition to new water permits with conditions imposing a minimum flow regime and new primary allocation limit.
Federated Farmers of New Zealand	57	Amend	Adopt an appropriate transitioning framework for the Lindis Catchment, enabling an extension of minimum flows for 5 years post expiry of deemed permits (mining privileges).	<ul style="list-style-type: none"> • Does not accept that the minimum flow should be immediately complied with upon the expiry of deemed permits in October 2021. • In complex situations like the Lindis, where the ability to access irrigation is already restricted by the environment, competing values exist, uncertainty remains about alternative options and the river itself is not clearly understood, a greater transitioning period will be required. • Under the NPSFM full implementation is required by 31 December 2025, or by 2030 if the 2025 timeframe will affect plan quality or is impracticable to fully implement by 2025. • Upon the expiry of mining right deemed permits, at least an additional five years is required to enable various processes. For example, transition to new sources or new points of take, investigating the feasibility of measures that mitigate the effects of the minimum flow on water availability, establishment of a catchment-wide water management group, the adoption and investment into more efficient irrigation practices. • The need for greater transition timeframes is reinforced through ORC's decisions to notify a 750 l/s minimum flow instead of the previously considered 450 l/s minimum

Name	Number	Position	Decision Requested	Reason for Decision Requested
				flow proposal, because landowners have effectively lost 6 years of repositioning their current water usage.
Michael and Felicity Hayman	58	Amend	Provide a longer timeframe before change is implemented	No reason given.
Justin and Tui Wilson	59	Amend	Increase the time in which the minimum flow will be implemented until 2026.	<ul style="list-style-type: none"> Introducing a minimum flow has huge repercussions for economic viability of farms reliant on Lindis water for irrigation. Landholders need time to build costly infrastructure to alleviate times of low flow.
Gordon Lucas	60	Amend	Operative flow time should be extended to 2025 at least.	Huge changes for all will take time to bed in.
Lesley Lucas	61	Amend	Time frame needs to be longer.	<ul style="list-style-type: none"> A lot of change requires time. Small blocks need water and houses need new setups for water access.
Central Otago Environmental Society Inc.	68	Support	Do not compromise on or delay the issue of a minimum flow.	The availability of alternative water sources for irrigation and the fact that the end of a permissive regime has been well-signalled for a number of years, supports submitter's view that nothing be allowed to impede or delay the process of restoring the Lindis River.
Beau Trevathan	69	Amend	Include a longer transition period to 2026 instead of 2021.	<ul style="list-style-type: none"> Including the Lindis catchment in Policy 6.4.5(c) means the existing timeframes outlined in the explanation to the policy would apply to the Lindis catchment. This will result in a lack of a feasible transition period for irrigators to adjust to the minimum flow regime and primary allocation limit, change to more efficient irrigation systems and potentially transfer water rights to an alternative source. There is no exact science that can be used to know how the river will react to relocation of water takes. The effects of proposals from Lindis Catchment Group need time to realise their effects.
Department of Conservation	70	Support	Retain as notified.	Policy 6.4.5 enables a RMA provision link to give effect to and implement the Chapter 12 rules of the RPW under RMA S67(1).
Geordie Hill Station Ltd	72	Amend	Delay the imposition of the minimum flow, and formulate provisions for transition from deemed permits and water permits, and put clear processes in place to facilitate this.	<ul style="list-style-type: none"> Changes required on farms are substantial. Reconfiguring irrigation infrastructure is a long term project, so farmers need a clear logical pathway and framework of rules and policies. Required on-farm changes need to take place before new requirements are imposed. ORC may not fully understand the magnitude of these changes. Submitter has made significant on-going investment in modern spray irrigation as it is vital to finish own stock on quality pastures. Forcing farm into water storage or expensive alternatives can devastate current production economics, and will force farms into less environmentally-light operations. ORC has not properly considered that water policy is aligned to making a living from traditional sheep and beef land use. Submitter wishes for similar availability of vital water that has sustained four generations of family on a farm that is an important part of the Tarras economy and social fabric.
Forest Range Ltd, R.S. Emmerson Trust	73	Amend	Increase the time frame in which the minimum flow will be implemented until 2016.	Gives affected farmers maximum opportunity to redesign their farming operations. Restrictions that benefit the wider community are at the farmer's expense, so ORC should assist during this transition period.
Forest Range Ltd, Lindis	74	Amend	Increase the time frame in which the minimum flow	Gives affected farmers maximum opportunity to redesign their farming operations.

Name	Number	Position	Decision Requested	Reason for Decision Requested
Trust			will be implemented until 2016.	Restrictions that benefit the wider community are at the farmer's expense, so ORC should assist during this transition period.
Contact Energy Ltd	76	Support	Retain Policy 6.4.5 as notified.	It is understood that the minimum flow and allocation regime will apply to any new consents granted but will only apply to existing permits after a collective review of the consents in the catchment. Such a review may occur at or prior to the expiry of deemed permits in 2021.
T J Cooke	79	Amend	Provide for a longer time frame for change.	Not able to prepare for a minimum flow to apply until at least 2026, as so much has to be done that requires cohesion, money, time, access, etc..
Lindis Irrigation Ltd	80	Amend	Amend Policy 6.4.5 so that implementation of minimum flow on Lindis River will not occur before October 2026	<ul style="list-style-type: none"> • No feasible transition period. • Policy 6.4.5 of the RPW does not provide clear process for Lindis irrigators to transition to new permits with a minimum flow and primary allocation limit regime. • Irrigators are required to make substantial changes to and investment in irrigation systems on and off farm (including increasing the efficiency of use and establishing new distribution water systems). Time is needed to establish new intake structures and conveyance systems and to shift water rights to an alternative source.
Lindis Irrigation Ltd	80	Amend	Provide a transition package including policies and rules to create a clear process, and appropriate timeframes, for an effective transition to new water permits with conditions imposing a minimum flow regime and new primary allocation limit.	No reason given.

36 Rule 12.1.4 and mapping of the Lindis Catchment

Name	Number	Position	Decision Requested	Reason for Decision Requested
The Point Partnership	22	Amend	<ul style="list-style-type: none"> • Retain the proposed amendments to Rule 12.1.4, but amend Maps B4 and B7 to include the full extent of the true geographic boundary of the Lindis catchment. • Include a policy and rule which would exclude consents in this area from the proposed minimum flow. This policy and rule could be linked to the Tarras Creek sub-catchment, as a mapped area within the wider Lindis Catchment. 	<ul style="list-style-type: none"> • Opposes Rule 12.1.4 in so far as it is linked to maps B4 and B7, which identify the Lindis catchment. • Part of the true geographic area of the Lindis Catchment is excluded from maps B4 and B7 (the Tarras sub-catchment). This creates unnecessary complexity and uncertainty for farmers who irrigate within this area. • Creating an arbitrary boundary for the catchment to exclude the Tarras Creek catchment from a minimum flow is a very blunt instrument to achieve this. • Notified plan change will result in dividing a small community by splitting it with an arbitrary boundary which denies some from reapplying for their water rights.
Rebecca McElrae	30	Amend	Use geographic maps instead of the proposed Maps B4 and B7.	Maps should not have random exclusions.
Adam Spiers	32	Amend	Include maps in the B-series of the Water Plan Maps that represent the true geographic area of the Lindis catchment.	<ul style="list-style-type: none"> • The geographic map for the catchment is the most practical and logical way to proceed. • Excluding one side of the valley from the map is confusing and not based on any investigation or assessment.
John Davis	33	Did not specify	If any restrictions are imposed it should apply to the total catchment area if there is an alternative supply.	Maps exclude parts of the Lindis catchment from using Lindis water when there is potentially water available (but at a very high cost) from the Clutha/Mata-Au.
Cloudy Peak Ltd	39	Amend	Include maps in the B-series of the Water Plan Maps that represent the true geographic area of the Lindis	The geographic map for the catchment is the most practical and logical way to proceed. Excluding one side of the valley from the map is confusing and not based

Name	Number	Position	Decision Requested	Reason for Decision Requested
			Catchment.	on any investigation or assessment.
J.C.A Lucas	42	Oppose	Proposed Maps B4 and B7 are opposed.	No reason given
Lindis Downs Ltd	45	Amend	Amend to include all geographic areas of the Lindis catchment.	This rule has caused confusion and there has been no reason or explanation given to exclude areas from the Lindis catchment.
Malvern Downs Ltd	47	Amend	Include the Tarras Creek catchment in the proposed B-series maps and retain existing boundaries of the Lindis Alluvial Ribbon Aquifer.	<ul style="list-style-type: none"> • Strongly opposes the boundary changes for the lower Tarras catchment and the ORC insisting we go to another water source. • To get water from an alternative source we would have to own land beside the river, then need at least five easements through other land owners' land before we could get water to our own property. This would be cost prohibitive for our farming operation.
Environmental Defence Society Incorporated	50	Support	Support the maps of the catchment boundary.	Supports the mapping of the boundaries of the catchment for the purposes of the minimum flow.
Peter William Jolly	52	Amend	Amend the catchment boundary as shown on proposed Maps B4 and B7 to include the whole of Lindis catchment.	<ul style="list-style-type: none"> • Tarras has relied on Lindis water for past 90 years. The proposed boundary would have major social and economic impacts on the Tarras community. • There is no guarantee around being able to obtain water and appropriate easements from any alternative source. • Proposed mapping of the catchment boundaries fails to meet the purpose and principles of the RMA, which states the economic and social wellbeing of a community must be taken into account.
Tim Davis	53	Amend	Define the Lindis catchment as the geographic boundary.	<ul style="list-style-type: none"> • Splitting the catchment into two looks like a blatant attempt to justify demand assumptions, and to make the proposed primary allocation work for ORC's surety of supply graphs. • Properties that have historically been taking water from the Lindis River should be treated the same, regardless of whether they are in the Upper Lindis, Lower Lindis or the Tarras basin.
Fish and Game Council	54	Support	Support Maps B4 and B7.	No reason given.
Lindis Catchment Group Inc	56	Amend	Redefine the catchment area and amend Maps B4 and B7 to include all of the true geographic area of the Lindis Catchment and retain the proposed changes to this rule.	<ul style="list-style-type: none"> • Rule 12.1.4 is opposed in so far as it is linked to Schedule 2A and the B-series maps which identify the Lindis Catchment. • The mapped catchment boundary does not recognise the true geographical catchment boundary. • Future decisions about sourcing water should not be limited or extinguished by an arbitrary approach to mapping. Creating an arbitrary boundary to exclude the Tarras Creek sub-catchment from a minimum flow is a very blunt instrument to achieve this. • The proposed boundary will result in significant adverse economic and social effects (including the lack of certainty and clarity about the implications of this catchment boundary, the time it will take to work through changing the location of takes and/or irrigation systems, and the associated economic and social costs of this, and the resulting inability or difficulty in making decisions about farm operations and investments). • Showing the true geographical extent to the Lindis catchment on Maps B4 and B7 would take away the uncertainty and complexities associated with the boundary as proposed by the ORC, and would enable irrigators to provide for their social and

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>economic wellbeing.</p> <ul style="list-style-type: none"> Existing Policy 6.4.OC of the RPW should be applied to applications relating to water takes, rather than creating an arbitrary catchment boundary. The effect of excluding part of the true geographic area of the Lindis Catchment from these maps, in combination with Rule 12.1.4.4, means that irrigators who take water from within the mapped catchment area shown on Maps B4 and B7 may not then 'use' it in the excluded area pursuant to this rule. This creates uncertainty and unnecessary complexity for applicants wanting to take and/or use water in the Tarras Creek area, as they may be treated differently from other users with existing primary allocation water rights from the Lindis catchment, without sufficient justification. When combined with the proposed maps in B4 and B7, the proposed change to Rule 12.1.4.4 fails to achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM.
Federated Farmers of New Zealand	57	Amend	Include the Tarras Creek catchment in the mapped boundary of the Lindis catchment as shown on proposed maps B4 and B7 and retain existing boundaries of the Lindis Alluvial Ribbon Aquifer.	<ul style="list-style-type: none"> To more appropriately reflect the reality that the Tarras Creek sub-catchment is an integral part of the overall Lindis River catchment. The proposed map creates uncertainty and unnecessary complexity for applicants wanting to take and/or use water in the Tarras Creek area, as they will potentially be treated differently from other users with existing primary allocation water rights from the Lindis catchment, without sufficient justification.
Michael and Felicity Hayman	58	Amend	Use geographic maps instead of the proposed maps B4 and B7.	No reason given.
Justin and Tui Wilson	59	Amend	Retain the status quo for the boundary of the Lindis catchment.	All farm-workers contribute to the vibrant local environment and economy, and they rely on Tarras, Ardgour and Lindis Valley landholders utilising Lindis water to provide employment opportunities.
Gordon Lucas	60	Amend	Use the geographic catchment for the mapping of the Lindis Catchment in the B-series of the Water Plan Maps.	Map as proposed divides the community which is unfair on non-farming Tarras residents.
Lesley Lucas	61	Amend	Stick with Tarras area as a whole in the B-series of the Water Plan Maps.	To be fairer. Division is unfair on those excluded from the Lindis catchment.
Beau Trevathan	69	Amend	<ul style="list-style-type: none"> Support Rule 12.1.4 insofar as it links to maps. Redefine the catchment area to include the full extent of the true geographic boundary of the Lindis catchment and exclude the Tarras Creek area from the minimum flow through a policy/rule linked to a mapped sub-area. 	<ul style="list-style-type: none"> Rule 12.1.4 is linked to the B-series maps which identify the Lindis Catchment. Part of the true geographic area of the Lindis Catchment is excluded from B-series maps (the Tarras sub-catchment). This creates uncertainty for irrigators in the area that has been excluded from the Lindis catchment. Maps B4 and B7 should not be amended as proposed, as they offer support to the original priority. Taking water to establish and sustain livelihood on small subdivisions in the Ardgour Valley in 1914 was given a priority ahead of any water taken to be delivered to the larger titles in the Tarras sub-catchment several years later. The catchment boundary does not recognise the true geographical catchment boundary of the Lindis River. This will result in unnecessary complexity and uncertainty. The proposed boundary will result in significant adverse economic and social effect.

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Creating an arbitrary boundary for the catchment to exclude the Tarras Creek catchment (see p 11 of S32 report) from a minimum flow is a very blunt instrument to achieve this. • Submitter suggests the inclusion of a policy and rule which would exclude this area from the proposed minimum flow. This policy and rule could be linked to the Tarras Creek sub-catchment, as a mapped area within the wider Lindis Catchment.
Department of Conservation	70	Support	Retain as notified.	<ul style="list-style-type: none"> • Support addition of Lindis catchment to Rule 12.1.4.4. • Addition of Lindis catchment to Rule 12.1.4.4 is required to implement proposed Policy 6.4.5(c) of the RPW.
Forest Range Ltd, R.S. Emmerson Trust	73	Amend	Leave the original catchment boundary unchanged.	Proposed map has no logic, as the area is one agricultural industry economically.
Forest Range Ltd, Lindis Trust	74	Amend	Leave the original catchment boundary unchanged.	Proposed map has no logic, as the area is one agricultural industry economically.
Contact Energy Ltd	76	Support	Retain Rule 12.1.4.4 as notified.	It is understood that the minimum flow and allocation regime will apply to any new consents granted but will only apply to existing permits after a collective review of the consents in the catchment. Such a review may occur at or prior to the expiry of deemed permits in 2021.
T J Cooke	79	Amend	Use geographic maps instead of the proposed Maps B4 and B7.	Exclusion is random.
Lindis Irrigation Ltd	80	Oppose	<ul style="list-style-type: none"> • Oppose Rule 12.1.4 in so far as it is linked to Schedule 2A and Maps B4. • Amend Maps B4 and B7 to include all of the true geographic area of the Lindis catchment. 	Our shareholders are spread across the whole catchment and some have irrigated land bisected by the dividing line. Excluding the Tarras Creek catchment will make partnership in new infrastructure more complicated.

16 Schedule 2C - Lindis Alluvial Ribbon Aquifer

Name	Number	Position	Decision Requested	Reason for Decision Requested
Bruce Jolly	46	Support	The Lindis Alluvial Ribbon Aquifer is supported.	No reason given.
Environmental Defence Society Incorporated	50	Support	Support treating connected groundwater as surface water.	No reason given.
Fish and Game Council	54	Support	Support Schedule 2C.	No reason given.
Lindis Catchment Group Inc	56	Support	Retain as proposed.	No reason given.
Contact Energy Ltd	76	Support	Retain Schedule 2C as notified.	Supports Schedule 2C and the inclusion of the Lindis Alluvial Ribbon Aquifer in this Schedule.

37 Schedule 4A – Maximum Allocation Limits

Name	Number	Position	Decision Requested	Reason for Decision Requested
Upper Clutha Angling Club	43	Support	Support.	Will assist in improving the river's aquatic environment by better maintaining appropriate minimum flows in the respective seasons which will help in restoring and maintaining a healthy aquatic environment for fish and other ecosystem components reliant on the Lindis River.
Environmental Defence	50	Support	Support the aquifer allocation limits.	Supports the setting of maximum allocation limits for specified aquifers within the

Name	Number	Position	Decision Requested	Reason for Decision Requested
Society Incorporated				Bendigo-Tarras Basin (the Ardour Valley, Bendigo, and Lower Tarras aquifers).
Fish and Game Council	54	Support	Support Schedule 4A.	No reason given.
Contact Energy Ltd	76	Support	Retain Schedule 4A as notified.	Supports the inclusion of the three relevant aquifers: the Ardour Valley Aquifer, the Bendigo Aquifer and the Lower Tarras Aquifer. These values are 50% of the calculated maximum extraction, according to the 2010 Bendigo and Tarras Groundwater Allocation Study.

38 Schedule 4B.2 - Restrictions on groundwater takes

Name	Number	Position	Decision Requested	Reason for Decision Requested
Malvern Downs Ltd	47	Oppose	Delete reference to the Bendigo and Lower Tarras Aquifers from Schedule 4B.2.	No reason given.
Fish and Game Council	54	Oppose	Oppose restriction on takes from the Bendigo and Lower Tarras Aquifers: "There shall be no take for irrigation purposes between 1 May and 31 August inclusive. Other restrictions may be imposed on resource consents to help maintain lake levels".	The existence of a resource consent to operate the Clutha/Mata-Au hydro scheme should not provide an open-ended and undefined ability for the RPW to place restrictions on water permits from these aquifers through Schedule 4B.2.
Lindis Catchment Group Inc	56	Oppose	Remove/delete this restriction on takes from the Lower Tarras and Bendigo Aquifers.	<ul style="list-style-type: none"> The proposed restriction on taking water from these aquifers during winter is not based on the best available information and scientific and socio-economic knowledge (e.g. sufficient evidence that these takes might have a discernible impact on lake levels or lake outflows). Winter takes are important to assist with frost fighting and with water harvesting for irrigation storage. Primary allocation takes from the Lindis catchment have existed long before the relevant hydro-electricity generation dams, and have an imperceptible impact on lake levels and outflows. The proposed restriction on takes from these aquifers will not achieve the purpose of the RMA and the objectives and policies of the RPS, PRPS and RPW, and is inconsistent with the NPSFM.
Federated Farmers of New Zealand	57	Amend	Delete reference to the Bendigo and Lower Tarras Aquifers from Schedule 4B.2.	<ul style="list-style-type: none"> Most winter takes from these aquifers have long preceded hydro-electricity in this area. Any resource consent concerns are more appropriately addressed on a case-by-case basis, on the facts of each case, as part of resource consent condition considerations. Not consistent with other aspects of the RPW (including the policy framework in Chapter 6, particularly Policy 6.4.1).
Contact Energy Ltd	76	Amend	Amend Schedule 4B.2 by the addition of the Ardour Valley Aquifer and the Lindis Alluvial Ribbon Aquifer (with appropriate map references).	<ul style="list-style-type: none"> For aquifers having a hydraulic connection to the Clutha River it is appropriate to place restrictions on new consumptive takes during the winter months when water is of maximum value for hydro-electric generation. The Lindis Alluvial Ribbon Aquifer and the Ardour Valley Aquifer should be added to Schedule 4B.2 as both are hydraulically connected to Lake Dunstan and the main stem of the Clutha/Mata-au above Lake Dunstan. It does not make sense to exclude seasonal restrictions from these aquifers if efficient use of water is to be maximised and the objective of 4B.2, to help maintain lake levels, is to be met. Recently granted resource consents have such restrictions as conditions to provide a

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<p>degree of protection to the operation of Lake Dunstan and Contact's hydroelectric operations. These conditions provide for maximum efficiency in the use of water: for irrigation during spring and summer when it is in demand; for electricity generation during autumn and winter when it is in demand.</p> <ul style="list-style-type: none"> The Lindis Alluvial Ribbon Aquifer and the Ardour Valley Aquifer should be added to Schedule 4B.2 as both are hydraulically connected to Lake Dunstan and the main stem of the Clutha/Mata-au above Lake Dunstan. It does not make sense to exclude seasonal restrictions from these aquifers if efficient use of water is to be maximised and the objective of 4B.2, to help maintain lake levels, is to be met.

22 Map C-series: C5, C6 - Lindis Alluvial Ribbon, Ardour Valley, Bendigo and Lower Tarras Aquifers

Name	Number	Position	Decision Requested	Reason for Decision Requested
Malvern Downs Ltd	47	Amend	Retain the existing boundaries of the Lindis Alluvial Ribbon Aquifer.	No reason given.
Lindis Catchment Group Inc	56	Support	Retain as proposed.	No reason given.
Federated Farmers of New Zealand	57	Amend	Retain existing mapping boundaries of the Lindis Alluvial Ribbon Aquifer.	Retaining the existing boundaries of the Lindis alluvial ribbon will appropriately ensure that there is no restriction on groundwater takes in the lower Lindis alluvial fan zone which isn't located within 100 m of the Lindis River.

30 Implementation - Other requests

Name	Number	Position	Decision Requested	Reason for Decision Requested
Bendigo Station	31	Amend	Enable opportunities to move takes and apply innovation and new technology to existing rights.	There is a lack of opportunities to move takes and to apply innovation and new technology.
Bendigo Station	31	Amend	Provide innovative ways to create surface flows in the lower reaches of the Lindis that would alleviate the need to reduce existing water usage for farming purposes under the current proposal.	Innovative ways to create surface flows are lacking.
Philip Parcell	38	Not Applicable	All of the natural flow of Church Creek, to be preserved with no irrigation takes allowed.	<ul style="list-style-type: none"> Need to preserve the bird life supported by Church Creek, which is a very important part of my enjoyment of the amenity of my property. Church Creek, which if left undammed with no irrigation, does flow into the Lindis at Lindis Crossing at times of high flow. Church Creek and its natural lagoons have been home to Blue herons, Oystercatchers, Stilts and Plovers. It seems ORC is determined to close the magnificent 80 year old Tarras Irrigation Scheme, which is a low cost, gravity scheme that irrigates 20 plus farms successfully. The Lindis remains an excellent fish hatchery even after 80 years of irrigation, and swimmers can always go to Lake Dunstan which also has excellent toilet and camping facilities. Submitter does not have any easements to access the Clutha/Mata-Au and have not met with any success in trying to negotiate "future proof" easements. Also, for the size of the farm, any irrigation supply from the Clutha/Mata-Au is uneconomic.

Name	Number	Position	Decision Requested	Reason for Decision Requested
Bruce Jolly	46	Not Applicable	Provide an enabling policy from local and central government to streamline the process to access alternative source.	<ul style="list-style-type: none"> Those that do not boundary the Clutha/Mata-Au would be seriously challenged to access alternative sources. The process to access alternative source is not very achievable for most individuals.
Lindis Catchment Group Inc	56	Not Applicable	Include provisions that interlink the minimum flow effectively with the new primary allocation limit so that these tools can work as an integrated package.	No reason given.

26 Minor and consequential changes

Name	Number	Position	Decision Requested	Reason for Decision Requested
Environmental Defence Society Incorporated	50	Amend	Amend as is necessary to address the issues raised in the submission including any minor or other consequential relief.	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Amend	Provide any minor or consequential relief that arises from relief sought.	No reason given.
Department of Conservation	70	Amend	Make further or alternative relief to like effect to that sought.	Alternative wording of like effect may be equally acceptable.
Contact Energy Ltd	76	Amend	Any other consequential changes required to give effect to the relief sought.	No reason given.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, and Te Runanga o Otakou (collectively Kai Tahu)	77	Amend	Implement the relief sought, make any similar amendments with like effect to the relief sought, and make any consequential amendments necessary to give effect to the relief sought.	No reason given.

27 Section 32 Report

Name	Number	Position	Decision Requested	Reason for Decision Requested
Bruce Jolly	46	Not Applicable	More weighting should be given to the pre-April Draft S32 Evaluation Report, where the science detail supports 450 l/s.	<p>The S32 Evaluation Report:</p> <ul style="list-style-type: none"> a) is seriously flawed and the social and economic evaluation could not stand up in a court hearing. b) does not provide supporting documentation to the percentages used in the various options under economic costs/risks. c) does not mention other ways of meeting the environmental gains required, other than minimum flow. Transition issues and other tools that could be used to enhance the outcomes have been disregarded, or policy enabling them are already in place.
Malvern Downs Ltd	47	Did not specify	Consider the S32 Evaluation Report inadequate.	The S32 Evaluation Report should be considered inadequate.
Federated Farmers of New Zealand	57	Not Applicable	That the Section 32 Evaluation Report is considered inadequate.	<ul style="list-style-type: none"> The S32 Evaluation Report is neither appropriate nor adequate. It is simply 'reporting' on pre-determined decisions without any sufficient evaluation. There has not been adequate identification or documentation of how conclusions within the evaluation report were reached and on what basis they were made.

Name	Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Statements in the S32 Evaluation Report are contradictory to the April 2014 Consultation Draft S32 Report and ORC's own evidence, previous comments, statements and science. • The analysis in the S32 Evaluation Report has neither been substantiated nor linked adequately to any additional reports. • S32 Evaluation Report does not enable a full understanding of the likely benefits, costs or risks of different options. • The economic impacts of the minimum flow options (on individual landowners, the community and regional economies have not been adequately considered or have been significantly underestimated. The marginal economic impacts between the various options require significantly greater assessment, particularly in terms of the marginal economic opportunity costs between the minimum flow options considered. • The economic benefits resulting from each minimum flow option are not adequately considered. • No discussion or analysis within the S32 Evaluation Report as to how the primary allocation limit of 1,000 l/s was reached.

Section 3:

Matters beyond the scope of the Plan Change

Matters not in the Plan Change

33 Matters beyond the scope of the Plan Change

Name	Number	Position	Decision Requested	Reason for Decision Requested
Gerald Telford	28	Not Applicable	Proactive management by ORC to occur.	<ul style="list-style-type: none"> • ORC, at times, seems out of step with local communities to enhance recreational usage. • There is the potential to highlight the Lindis as a model to showcase a new regime and desire by all groups involved in this process to deliver positive community outcomes and environmental standards.
Fish and Game Council	54	Not Applicable	Add "birddiv" to the list of values of the Central Otago subregion included in Water Plan Schedule 1A.	The presence of indigenous waterfowl and wading birds in the lower Lindis justifies this addition to Schedule 1A of the RPW.
Lindis Catchment Group Inc	56	Not Applicable	Inclusion of new policies and rules granting primary allocation status to any take which has primary allocation status in relation to a tributary of the Clutha/Mata-Au (including the Lindis River and its tributaries) which is moved from that tributary of the Clutha/Mata-Au to the main stem of the Clutha/Mata-Au.	No reason given
Contact Energy Ltd	76	Not Applicable	Provide for transparency and understanding of the level of ongoing allocation in the Lindis River and associated aquifers by publicly notifying such information.	<ul style="list-style-type: none"> • In the interests of the community of water users and ORC it would be useful if all parties were able to understand the level of allocation available. • Transparency could be achieved by publishing allocation levels on, for example, the ORC's internet site (which is able to be updated regularly) or by public notice from time to time