

Staff's proposed changes to Compliance Plan objectives

Current Objectives	What could improve	Proposed revision
<p>To improve environmental outcomes associated with the activities ORC regulates – such as discharges to land, water and air, the take and use of water, and activities which impact on our rivers, lakes, wetlands and coastal environment.</p>	<p>This could be refocused on what Compliance can directly achieve – i.e. behaviour change.</p>	<p>Identify and prioritise the Compliance activities that ORC will focus its resources on over the life of the Plan.</p>
<p>To identify and prioritise the activities that we will focus our resources on over the next 18 months.</p>	<p>This is the Plan's main job. The timeframe doesn't match the plan, though.</p>	<p>Increase rule adherence and environmental best practice among resource users.</p>
<p>To inform communities and consent holders in Otago about the compliance activities ORC undertakes to protect our environment, encourage compliance and good practice, and improve environmental performance and raise environmental awareness.</p>	<p>Staff often use the plan to support communications with consent holders and the wider public about how compliance and monitoring activities are justified. It is not a general communications plan or engagement document, so the wording here could be more focussed.</p>	<p>Communicate with communities and consent holders about ORC's compliance activities, encourage good practice, and raise environmental awareness.</p>

Staff’s proposed changes to Compliance Plan Priorities

Across all priorities, staff recommend including the purpose of the activities first (the “why”), making the wording more active.

Current Priorities		Comment	Proposed revision
Priority 1:	<i>Reduce non-compliant discharges to improve freshwater quality</i>	Territorial Authorities Wastewater treatment plants are currently prioritised as “large scale” under priority 2; In practice, they should be considered priority 1.	<i>Improving freshwater quality by reducing non-compliant discharges</i> Include wastewater treatment plants in listed activities for priority 1 rather than priority 2.
Priority 2:	<i>Proactive and integrated approach to monitoring large-scale activities</i>	“Large-scale” isn’t consistently understood – in this context it means activities that involve multiple inter-related consents (e.g. for earthworks, water takes, discharges, and structures), and/or occur at a scale or intensity that concentrates potential effects in one place (like large quarries, or major industrial plants).	<i>Reducing risks from large-scale and complex activities through proactive and integrated monitoring</i> “large-scale” needs to be defined in supporting text.
Priority 3:	<i>Monitor water takes and use to protect water quantity</i>	No changes proposed for the content of this priority	<i>Protecting water quantity by monitoring water takes and use</i>
Priority 4:	<i>Monitor structures and works in and adjacent to freshwater</i>	This priority can be expanded to include the purpose. Staff also consider that it is worth including bores explicitly in the listed activities that comprise this priority	<i>Protecting freshwater habitats, hydrological function, and aquifer security by monitoring structures and works in and adjacent to freshwater</i> Include bores in the listed activities.
Priority 5:	<i>Reduce non-compliant air discharges to improve air quality</i>	Air is often a poor cousin to water quality; but in practical terms Compliance has limited tools to make an impact. This level of priority is appropriate.	<i>Improving air quality by reducing non-compliant air discharges</i>
Priority 6:	<i>Monitor coastal structures and oil spill preparedness</i>	“Oil spill preparedness” is odd to include – it’s an internal operational concern not an activity. This is the only priority to mention marine activities, and discharges are not mentioned.	<i>Protecting coastal habitats and water quality by monitoring coastal structures and discharges</i>