Tables: Wise Response submission to the Freshwater part of the pRPS in Table format with ORC s42 response and an update of Wise Responses position.

Decision requested in Section a) of our original submission	ORC s42 response	Updated position
1. It is clear that human behaviour is the cause of the environmental degradation that now threatens social and economic stability, and indeed, by undermining the integrity of the biosphere and transgressing planetary boundaries, life on earth itself. Thus, in developing policy, give priority to **requiring us humans to better manage ourselves, rather than better management the environment.** A swing from managing effects, to controlling inputs falls in this category.	"Wise Response seeks broad relief relating to all natural resources, however the FPI is largely only relevant to freshwater. In my view, the type of environmental limits described by Wise Response are comparable to those set through the NOF process set out in the NPSFM (particularly limits on resource use and take limits, as well as the 'bottom lines' for various attributes in Appendix 2A) and the concept of Te Mana o te Wai . I do not consider an alternative approach is warranted and therefore do not recommend accepting this submission point." [328, s42A Report]	The fact remains that it is human behaviour that is the problem so the RPS must change that if it is to work.
2.Throughout the pRPS use the national net zero-carbon target as the consistent "touchstone" for gauging what policies are necessary, realistic, a priority and sustainable in the medium and longer term. We therefore need to anticipate the requirement to take the effect of activities on climate change by decisions that promote a shift to renewable energy.		This is a key idea for our submission – a backcasting method that can determine what activities are acceptable or not. The only reference to "net zero" in the pRPS is in IM-M5 - Other Methods, and is an "encourage" *"(3) encourage changes to business practice that will enable businesses and communities to function in a net-zero carbon economy, and"* – wet bus ticket!? IM-P10 is the climate change policy but not part of the FPI We wish to see this concept in the RPS in some form This is expressed in our proposed revisions to achieve water quality targets more quickly than in the notified pRPS.
3.Identify and adopt a common set of ecologically-sound natural resource and environmental standards across the region consistent with the RPS vision that needs to be met by any FMU visions. More localized standards would always be stronger and never weaker than these. For example, stronger standards for significant or outstanding areas or elements.		The new Policy LF-FW-O1A – Region-wide objective for freshwater [960 s42A] goes some way to achieving this. We however propose changes to the wording of that. Realising the NPSFM and associated objectives requires among other things managing land use practices. This in turn requires integrating resource management practices across terrestrial, freshwater, and coals/wetland systems. This is in line with te Mana o te Wai principle of ki uta ki tai, from the mountains to the sea. The ORC argues that LF-WAI-P3 addresses this integration requirement (s8.3.1 para 714). We wish to see this explicitly recognised in the RPS as the mechanism to achieve the integration outcome
5.In order to meet Te Mana o Te Wai, improve (i.e., potentially better than national policy) all water bodies rather than just the significant and focus on rebuilding biophysical capacity and ecosystem function rather than "outstanding" water bodies and the "values" that we decide are important	"I consider that the provisions of the FPI, including the LF chapter, include direction on ecological health, as well as the wider health and well-being of water bodies and freshwater ecosystems. In addition, there is specific direction on the management of outstanding water bodies and their significant values in the NPSFM which the pORPS	We consider this principle should be retained and high standards than the NPSFM require achieved.

	must give effect to. I do not recommend accepting the submission point by Wise Response." [287, s42A Report]	
7.The formal adoption of an Integrated Landscape Management approach (ie whole-of-catchment in the NPSFM) that includes treating catchments as water retention vessels, (whose nutrient and water holding capacity can be enhanced) rather than a drainage areas with largely fixed hydrological characteristics.	In my view, the concept of "whole systems" management is akin to integrated management and therefore addressed in LF-WAI-P3. I do not recommend accepting this submission point.	As freshwater arrives in all parts of the catchment as precipitation, flows over or percolates through it before it accumulates and discharges in streams and rivers the RPS can only be integrated if it addresses "freshwater" management in the context of catchment management. How we manage our catchments directly affects flow distribution, the efficiency of water use and of course the quality of the water.
8. The tone of provisions often lacks the urgency and firmness that is required.		This applies more to the introduction to the pRPS and the overall document than specifically to the FPI but there are still wordings that essentially appeal for good practice but the wording still would effectively permit no or little action. We ask the Panel to ensure that if wording cannot be firm in the pRPS it is such that it will require firm and measurable wording in Plans.

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
Land and Freshwater						
Te Mana o te Wai						
LF–WAI–O1 –	Support provision and reasons given	Provides excellent basis for guiding policy	No change	LF-WAI-O1 – Te Mana o te Wai The mauri of Otago's water bodies and their health and well-being is protected, and restored where it is degraded, and the management of land and water recognises and reflects that: (1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship ~~endures through time, connecting~~ connects past, present and future, (3) each water body has a unique whakapapa and characteristics, (4) fresh water, ~~and~~ land, and coastal water have a connectedness that supports and perpetuates life, ~~and~~ (4A) protecting the health and well-being of water protects the wider environment and the mauri of water, (5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports., and (6) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.	Accept changes	Rennie
LF–WAI–P1 – Prioritisation	Support provision and reasons given	Provides excellent basis for guiding policy	No change	LF-WAI-P1 – Prioritisation. In all decision-making affecting ~~management of~~ fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies and freshwater ecosystems, (te hauora o te wai) and the contribution of this to the health and well-being of the environment (te hauora o te taiao), ~~and~~ together with the exercise of mana whenua to uphold these, (2) second, health ~~and well-being~~ needs of people, (te hauora o te tangata); 988 interacting with water through ingestion (such as drinking water and	Accept changes	Rennie

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
				consuming ~~harvested~~ resources harvested from the water body) and immersive activities (such as harvesting resources and ~~bathing~~ primary contact), and (3) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.		
Vision						
LF-FW-O1A – Region-wide objective for fresh water **KEY POLICY**	Amend	We are very supportive of this police development but it is incomplete. There are other very important concepts that are logically included in here for completeness and efficiency. Note that our inclusion of an integrated management approach is essentially just working in with the natural hydrological cycle and in that sense is a practical reflection of both the "water sensitive design" concept concept and Ki uta ki tai.	Not in the original submission as it is a new policy proposal from ORC		Objectives LF-FW-O1A (With Wise Response recommended changes) – Region-wide objective for fresh water In all FMUs and rohe in Otago and within the timeframes specified in the freshwater visions in LF-VM-O2 to LF-VM-O6: (1) healthy freshwater ecosystems support healthy populations of indigenous species and mahika kai that are safe for consumption, (2) the **functional** interconnection of land **and soil**, freshwater (including groundwater) and coastal water is recognised **with an integrated management approach (Ki uta ki tai)**, (3) indigenous species migrate **for natural lifecycle behaviour** easily and **as** naturally **as possible,** (4) the natural character, including **the** form, and function **and extent** of water bodies reflects their natural **condition** ~~behaviours~~ to the greatest extent practicable, (5) the ongoing relationship of Kāi Tahu with wāhi tūpuna, including access to and use of water bodies, is sustained, (6) the health of the water supports the health of people and their connections with water bodies, (7) innovative and sustainable land and water management practices provide for the health and well-being of water bodies and freshwater ecosystems and improve resilience to **environmental risks and trends including** ~~the effects of~~ climate change, and (8) direct discharges of wastewater to water bodies are phased out to the greatest extent practicable. **(9) use of exogenous inputs with effects exceeding environmental limits are phased out (10) natural fertility, water harvest and water retention throughout the catchment are improved with soil, land and cover management (11) the quality of all freshwater is being maintained and where degraded, improved (12) progress toward water quality targets is being effectively tracked (13) all freshwater use is for activities compliant with national and international emissions reduction and biodiversity policy agreements.**	All.
LF-VM – Visions and management	Amend We have concerns over the inconsistencies between the FMU and Rohe which are going to make compliance for	For the avoidance of doubt and to improve consistency.	Immediately after the heading Objectives insert These FMU and Rohe visions are in addition to meeting all other provisions in this statement and cannot be weaker than a national standard or provision	I acknowledge the concerns raised by Wise Response in relation to avoiding doubt. However, I consider that the pORPS is clear in its intent that it is to be read together, and that the visions do not have priority over any other provisions. As described in the Statutory Context section in Part 1 of the pORPS, the statement must pe prepared in accordance with and/or give effect to	Accept explanation	Lenihan

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
	the region extremely difficult		If the Commissioners have the authority ensure that the wording of the different FMU and Rohe are as consistent in scope and target attribute state as possible. Essentially these must all be consistent with achieving emission reduction, life-supporting, integration and resilience objectives elsewhere in the RPS. This needs to be reflected in the explanation LF-VM-E2	higher order national direction instruments. The pORPS does not contain rules, so is not weaker than national environmental standards. I recommend rejecting the submission point. Regarding LF-VM-E2 "Explanations are related to the content of the policies in a given section of a plan. I do not consider the matters raised by Wise Response are specifically included in the policies, therefore I do not recommend accepting this submission point".		
LF-VM – O2 Clutha Mata-au	Amend	Improving clarity, removing loopholes and controlling nutrient input as a more certain method. Timeframes too long with uncertainty of climate emergency and fossil energy supply. Also, timelines here are meant to reflect IM-P6 –"Avoid undue delays in decision-making processes".	(7) in addition to (1) to (6) above: (a) in the Upper Lakes rohe, the high-quality waters of the lakes and their tributaries are protected and restored, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community, (b) in the Dunstan, Manuherekia and Roxburgh rohe: (i) environmental flow regimes ~~flows~~ in water bodies sustain and, ~~wherever possible,~~ restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices in accordance with Te Mana o te Wai, and …. (c) in the Lower Clutha rohe: (i) there is no further modification of the shape and behaviour of the water bodies and opportunities to restore the natural form and function of water bodies are promoted ~~wherever possible,~~ (ii) the ecosystem connections between freshwater, wetlands and the coastal environment are preserved and, ~~wherever possible,~~ restored,	I agree that interim timeframes are likely to be necessary in some cases in order to track progress towards achievement of the visions. However, I do not agree that the pORPS is the appropriate place for them. In my view, the long-term visions set out the 'final state' of implementing the NPSFM, and in particular the NOF. It is appropriate for these to be included at the RPS level because they are strategic and will require actions by all councils and communities. The NOF sets out a series of subsequent steps that 'break down' the pathway for achieving the visions. These requirements relate to regional plans, rather than regional policy statements Insert "restored" "I consider that the relief sought by Wise Response is satisfied by the amendment recommended in response to the Contact submission and recommend that this submission is accepted in part". Minimising direct discharges of wastewater has been picked up in the LF-FW-O1A (8)	Timeframes and milestones: needs planning and legal view. One way or another it is important to set sensible milestones as otherwise any change will be left to the last minute (e.g. consider Deemed Permits). They become more important if the longer time horizons are retained eg 2050. Could the interim milestones be linked to the current requirement for a state of the environment report? Regarding milestones we have proposed policy for the overall objectives for FMUs LF-FW-O1A that **"progress toward water quality targets is being effectively tracked".** This may need to be expressed in a policy. The ORC rewording is: in the Upper Lakes rohe, the high-quality waters of the lakes and their tributaries are protected, **and if degraded are improved**, This is too weak to drive meaningful policy in the L&WP. **"reduce inputs"** is a key concept that our evidence indicates we need in the RPS. Accordingly, we have proposed policy for the overall objectives for FMUs LF-FW-O1A **"use of exogenous inputs with effects exceeding environmental limits are phased out.** Exogenous is intended as a catch all including pesticides, medications etc.	Lenihan Rennie Joy Joy Beattie

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			(iii) land management practices reduce <u>inputs and</u> discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, <u>and (iv) there are no direct discharges of wastewater to water bodies</u>, and ….. (8) the outcomes sought in (7) are to be achieved within the following timeframes: (a) by 2030 in the Upper Lakes rohe, (b) by ~~2045~~ <u>2035</u> in the Dunstan, Roxburgh and Lower Clutha rohe, and (c) by ~~2050~~ <u>2035</u> in the Manuherekia rohe <u>and to all incorporate and report on 5 yearly milestones</u>.			
LF-VM – O3 North Otago FMU vision	Amend	Timeframes too long with uncertainty of climate emergency and fossil energy supply.	By 2050 <u>2035</u> in the North Otago FMU: New provision <u>(7) there are no direct discharges of wastewater to water bodies</u>	I recommend retaining the timeframes in the objectives of the LF-VM, subject to specific amendments recommended elsewhere in this report.	Maintain our view that the water quality goal should be **2035**. It needs 3 or 5 year milestones depending on the final timeframe proposed. We would accept **2040** for such a large catchment with 5 yearly milestones LF-FW-O1A (8) picks the discharge issue up now	Salinger Surendren
LF-VM – O4 Taieri FMU vision	Amend	Timeframes too long with uncertainty of climate emergency and fossil energy supply.	By ~~2050~~ <u>2035</u> in the Taieri FMU:	I recommend retaining the timeframes in the objectives of the LF-VM, subject to specific amendments recommended elsewhere in this report.	Maintain our view that the water quality goal should be **2035**. It needs 3 or 5 year milestones depending on the final timeframe proposed. We would accept **2040** for such a large catchment with 5 yearly milestones	Salinger Surendren
LF-VM – O5 Dunedin & Coast FMU vision	Amend	Timeframes too long with uncertainty of climate emergency and fossil energy supply.	By ~~2040~~ 2035 in the Dunedin & Coast FMU:	I recommend retaining the timeframes in the objectives of the LF-VM, subject to specific amendments recommended elsewhere in this report.	Maintain our view that the water quality goal should be **2035**. It needs 3 or 5 year milestones depending on the final timeframe proposed. We would accept **2040** for such a large catchment with 5 yearly milestones	Salinger Surendren
LF-VM – O6 Catlins FMU	Support	Timeframe appropriate and realistic	By 2030 in the Catlins FMU:		Accept	
LF–VM–P6 – Relationship between FMUs and Rohe	Amend	It is essential that all FMU plans are developed with an understanding of environmental and resource risks facing landuse and associated communities.	Where rohe have been defined within FMUs: (1) environmental outcomes must be developed for the FMU within which the rohe is located, <u>based on a thorough review of local, national and international risks, limits and trends with the potential to significantly affect the environment and resources</u>.	I consider the amendment sought by Wise Response would introduce uncertainty into the policy. It is unclear what the submitter means by "risks, limits and trends" or what would be considered a "significant" effect. Environmental outcomes have a specific definition in the NPSFM and there is a defined process that their development must follow including, in particular, clauses 3.9 (identifying values and setting environmental outcomes as objectives) and 3.10 (identifying attributes and their baseline states, or other criteria for assessing achievement of environmental outcomes)".	Concept should remain to be consistent with NPSFM requirement for long-term visions to be informed by "environmental pressures" (NPSFM 3.3(3) (b)). The important thing is that the attributes etc need to be based on the likes of climate change, energy trends, biodiversity loss etc. which are environmental pressures Proposed tighter wording: Where rohe have been defined within FMUs: (1) environmental outcomes must be developed for the FMU within which the rohe is located**<u>, informed by</u> <u>environmental and resource risks, limits and trends</u>**.	Salinger Surendren

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
Objectives						
LF–FW – Fresh water Objectives LF–FW–O8 – Fresh water	Amend	To clarify and extend Objectives to other important processes	In Otago's water bodies and their catchments: (1) the health of the wai supports the health of the people and thriving mahika kai, <u>with water quality in all degraded water bodies in the region improved to a minimum of amenity and contact recreation standard by 2035.</u> (2) water flow is continuous throughout the whole system <u>with fundamental hydrological process functioning normally</u>, (3) the interconnection of fresh water (including groundwater) and coastal waters is recognised, (4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and ~~(~~5) the significant and outstanding values of Otago's outstanding water bodies are identified, <u>restored where degraded</u> and protected. <u>(6) the soils and cover are being managed to maximise the natural capture, retention and infiltration of rainfall within the land and minimising the need for artificial fertilizer.</u> <u>(7) management is as "whole systems" that maximise resilience, biophysical capacity and community wellbeing</u>	"The direction sought by Wise Response in relation to improving degraded water bodies is included in LF-FW-P7. I consider the remaining amendments (i.e. all water bodies being suitable for amenity and contact recreation by 2025) would inappropriately pre-empt the NOF process which is being followed in the development of the LWRP. I have previously addressed the long-term freshwater vision timeframes in section 8.4.3 of this report. For the same reasons as I have set out there, I do not consider imposing a 2035 deadline for all water bodies is practical or achievable. I do not recommend accepting this submission point". I do not disagree with the reasoning behind the relief sought by Wise Response. However, I consider that the management of soils in relation to freshwater is addressed in the LF-LS section, and particularly through LF-LS-P16, LF-LS-P17, LF-LS-P18, and LF-LS-P21. **I recommend deleting LF-FW-O8** .	Maintain our view that the water quality goal should be **2035**. We think that contact recreation is not a high bar. High standards might take to **2040**. Is what LF-FW-P7 - Fresh water includes enough for "specified" bodies: Are those specified rivers and lakes just a generic 4th order categorisation? See Appendix 3, NPSFM "(3) specified rivers and lakes are suitable for primary contact within the following timeframes: (a) by 2030, 90% of rivers and 98% of lakes, and (b) by 2040, 95% of rivers and 100% of lakes, and" Are there any legal or technical grounds to alter these? We asked for a completely eutrophication free state in all water bodies in the Lakes zone for instance at LF-FW-P7(3) (see below) Regarding our soils and cover proposal (6) We consider that the suggestion that it is more appropriate in the LF-LS section is wrong because its about optimising the capture and release of rainfall/freshwater to maximise resilience and freshwater benefit at a catchment scale. We have proposed this instead in LF-FW-O1A **<u>(12) natural fertility, water harvest and water retention throughout the catchment are improved with soil, land and cover management</u>** <u>This must be an activity that the regional and territorial authorities promote.</u> A consequential change to LF-LS-P16. if the above provision is accepted *LF-LS-P16 –* ***~~Maintaining s~~*** *Soil quality. Maintain* ***<u>and where it is degraded</u>****, improve soil quality by managing both land and freshwater resources, including ~~the~~ interconnections between soil health, vegetative cover and water quality and quantity.* NPSFM requires a whole of catchment approach As policy 08 has been deleted it is necessary to find other homes for those submission points retained.	Joy Beattie (Anderson) Salinger Surendren
LF–FW – Fresh water Objectives LF–FW–O9 – Natural wetlands	Amend	To clarify and extend Objectives to other important processes.	Otago's natural wetlands are protected or restored so that: (1) mahika kai and other mana whenua values are sustained	I am unsure what is meant by the term "recovery" in the amendments sought by Wise Response to clause (2) and whether the submitter intends it to be applied on a wetland-by wetland basis or at a broader scale. LF-FW-P10 requires improving the ecosystem health,	In order to rectify the loss of 90% of wetlands there is a need to do it wetland by wetland which will cumulate to provide the broader scale. See reasons given in the table.	

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
KEY POLICY		Points (6) and (7) above in the freshwater objectives will improve flood retention capacity. Likewise, a steady recovery of the range and extent of wetlands.	and enhanced now and for future generations, (2) there is ~~no decrease~~ a steady recovery in the range and diversity of indigenous ecosystem types and habitats in natural wetlands, (3) there is no reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if degraded they are improved, and (4) their flood attenuation capacity is steadily improved ~~maintained~~	hydrological functioning, water quality, and extent of natural wetlands where they have been lost by requiring four specific actions to be undertaken where possible. However, I acknowledge that the objective (LF-FW-O9) focuses primarily on preventing any further loss, rather than anticipating improvement. In light of my recommended amendments to clauses (2) and (3) in the previous paragraphs, and taking into account the direction in LF-FW-P10, I recommend accepting this submission point in part and amending clause (2) to include a preference for an increase in the extent and diversity of indigenous ecosystem types. In my view this is consistent with the approach adopted in clause (3). ORC now proposes (4) their flood attenuation and water storage capacity is maintained or improved.	We fail to see what is wrong with "recovery" but propose as an alternative (2) there is ~~no decrease~~ a **steady restoration** in the extent and diversity of indigenous ecosystem types and habitats in natural wetlands, This is consistent with our request for "ecological gain" as a universal default. The revised wording is too weak. We propose the following alternative again to be consistent with "ecological gain". (4) their flood attenuation and water storage capacity is maintained **and where degraded, steadily** improved. But this needs to be consistent with (4) above That would also be consistent with LF-FW-P7(1).	Lenihan Lenihan
Policies						
LF–FW–P7 – Fresh water **KEY POLICY**	Amend	More clarity and introducing the concept of "effective efficiency" which takes into account groundwater augmentation opportunity and other factors at a catchment level. Timelines that are not so distant they become irrelevant or they will be not start t change behaviour. These need to be supported by milestones for the same reason.	Environmental outcomes, attribute states (including target attribute states) and limits ensure that: (1) the health and well-being of water bodies is maintained or, if degraded, improved, (2) the habitats of indigenous species associated with water bodies are protected, including by providing for fish passage, (3) the entire length of specified rivers and lakes, and all those in the Upper Lakes Rohe are suitable for primary contact and eutrophication-free within the following timeframes: (a) by 2030, 90% of rivers and 98% of lakes, and (b) by 2040, 95% of rivers and 100% of lakes, and	62. At paragraph [1402], the Section 42A Report states that: "LF-FW-P7(3) implements Policy 12 in a way that is consistent with the previous direction in the NPSFM and incorporates the regional targets decided by ORC, following consultation with communities. It is not intended to be a 'general' water quality target – it is specific to suitability for primary contact and to achieving the national target in Appendix 3. Additionally, I consider the amendments sought relating to the Upper Lakes rohe are already provided for in the relevant freshwater visions (LF-VM-O2(7)(a)). I do not recommend accepting the amendments sought by Wise Response Re Overallocation ORC say: "The amendment sought by Wise Response to refer to allocation of water and nutrients is not necessary as the definition of over-allocation specifically refers to both quality and quantity. As discussed previously, I do not consider a blanket timeframe for phasing out overallocation is practical – these need to be	There is no specific reference to eutrophication for the upper lakes. This is the current vision for the Upper Lakes: " in the Upper Lakes rohe, the high quality waters of the lakes and their tributaries are protected, and if degraded are improved, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community," 10% per annum is set to achieve the outcome in a decade. This may be stronger than the NPSFM requires but that is permitted – RMA43 B and NES. Essentially, the idea is to get rid of overallocation as soon as possible for both ecological and sustainability reasons given climate change is going to put increasing stress on all systems.	Joy Rennie

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			(4) mahika kai and drinking water are safe for human consumption, (5) existing over-allocation of both nutrients and water are ~~is~~ phased out by 2035 with milestones of 10%/an and future over-allocation is avoided, and (6) fresh water is allocated within environmental limits and its use and hydrological efficiency is optimised within each catchment by 2040.	considered in the circumstances they arise and in consultation with communities. For the same reasons, I am not convinced a 10% reduction Section 42A report for the Proposed Otago Regional Policy Statement: Freshwater Planning Instrument 290 per annum would be appropriate or achievable in all circumstances. I do not recommend accepting the submission point by Wise Response".	We have addressed the hydrological optimisation proposal in the new Policy LF–FW–P7A(3) with **" where there are overall water management benefits,"**	Lenihan
LF-FW-P7A Water allocation and use	Amend	Ensures that consideration of limit is not confined to the local take and use but includes consideration of the wider trends and constraints. Makes "limits" in the subclause unnecessary. Ensures that large costs are not spent achieving efficiencies at a local level when there are no water availability and/or amenity benefits at a catchment level. Promotes optimization at catchment scale.	New Policy proposed by the ORC		We propose the following word additions: LF-FW-P7A – Water allocation and use. Within **both environmental and resource** limits and in accordance with any relevant environmental flows and levels, the benefits of using fresh water are recognised and over-allocation is either phased out or avoided by: (1) allocating fresh water efficiently to support the social, economic, and cultural well-being of people and communities to the extent possible ~~within limits~~, including for: (a) community drinking water supplies, (b) renewable electricity generation, and (c) land-based primary production, (2) ensuring that no more fresh water is abstracted than is necessary for its intended use, (3) **where there are overall water management benefits,** ensuring that the efficiency of freshwater abstraction, storage, and conveyancing infrastructure is improved, including by providing for off-stream storage capacity, and (4) providing for spatial and temporal sharing of allocated fresh water between uses and users where feasible.	Salinger Surendren Lenihan
LF–FW–P9 – Protecting natural wetlands	Amend	All activities must be legitimate and consistent with the relevant national planning objectives.	Notwithstanding policy LF-FW-P7 ~~P~~rotect natural wetlands by: (1) avoiding a reduction in their values or extent unless: (a) the loss of values or extent arises from permitted: (i) ~~the~~ customary harvest of food or resources undertaken in accordance with tikaka Māori, (ii) restoration activities, (iii) scientific research, (iv) ~~the~~ sustainable harvest of sphagnum moss, (v) ~~the~~ construction or maintenance of wetland utility structures, (vi) ~~the~~ maintenance of operation of specific	"While I acknowledge that Policy 6 of the NPSFM only requires 'promoting' the restoration of natural wetlands, clause 3.22(4) requires regional plans to include provisions that "provide for and promote" their restoration. Given the loss that has occurred, I consider it is appropriate for this policy to be more stringent that the NPSFM. However, I accept that "where possible" may be too stringent. Elsewhere in this report, I have recommended replacing "where possible" with "to the greatest extent practicable". I consider this amendment would reduce the stringency of the direction without removing it. I recommend accepting the submission points of Forest and Bird, Beef + Lamb and DINZ, Wise Response, Silver Fern Farms, and Manawa Energy in part".	The intention of inserting "permitted" was to make sure that the activity was approved and so resource use could be monitored. Eg cultural harvesting of sphagnum moss or recreational fishing/taking of whitebait etc as examples We propose replacing "permitted" with "authorized" .	Rennie Joy

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			infrastructure, or other infrastructure, (vii) natural hazard works, or (b) the Regional Council is satisfied that: (i) the activity is necessary for the construction or upgrade of specified infrastructure, (ii) the specified infrastructure will provide significant national or regional benefits <u>that are consistent with national emission reduction goals</u>, (iii) there is a functional need for the specified infrastructure in that location <u>rather than primarily economic</u>, (iv) the effects of the activity on indigenous biodiversity are managed by applying either ECO–P3 or ECO–P6 (whichever is applicable), and (v) the other effects of the activity (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and			
LF–FW–P10 – Restoring natural wetlands **KEY POLICY**	Amend	Only 10% of NZs wetlands remain yet they are important for both ecological and hydrological reasons. With climate change this will become more so, so it is imperative that the wetland area is significantly increased again. Such repair can therefore be justified on economic grounds alone. Wording needs to be quantifiable.	Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where <u>technically</u> possible: (1) an increase in the extent and quality of <u>former wetland</u> habitat for indigenous species <u>by 10%/an</u>, (2) the restoration of hydrological <u>and ecological</u> processes, <u>including the steady re-establishment of the original ground and surface water levels.</u>	The submission by Wise Response provides no evidence for the 10% per annum increase in extent and quality of habitat for indigenous species so I am unsure how practical or achievable this is. I am also unsure how the 10% increase in quality would be measured. I also have difficulty with requiring "re-establishment of the original ground and surface water levels" because it is unclear what "original" is. I do not recommend accepting this submission point.	This comes back to the question of whether or not you put quantifiable terms in the RPS (timelines and outcomes etc). In reality the restoration of hydrological processes will require the "steady re-establishment of the original ground and surface water levels" (ORC effectively acknowledge that in para 1481– "Restoring hydrological processes, such as their connections with surface water bodies and groundwater, is an important part of restoring wetland health". The key issue is how do we make sure that the massive loss of wetlands is actually redressed to any significant extent (given it is such an important element in mitigating water quality and emissions). At the very least steady rehab needs to be built into farm plans and linked to milestones.	Rennie Lenihan Joy
LF–FW–P15 – Stormwater and wastewater discharges	Amend	Stormwater from urban areas is usually artificial diversion to waste. The recommendations are to rethink this attitude and consider how to reintegrate that water with the natural cycle	LF–FW–P15 –Stormwater and wastewater discharges: Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by: (1) ~~except as required by LF–VM–O2 and LF–VM–O4,~~ preferring discharges of wastewater to land over	At paragraph [1521], the Section 42A Report (LF-FW-P15 – Stormwater and wastewater discharges) states that: "I do not consider that it is practically possible for the majority of stormwater to be reintegrated with natural hydrological processes and consider that the amendment I have recommended above to provide for alternative treatment and disposal methods goes some way in addressing the matters raised by Wise Response in relation to clause (2)(b). I do not recommend accepting this part of the submission point".	Better integration of stormwater in the urban context is now all the rage in Auckland after Garbielle. Removing the references to waste water from the policy simplifies it considerable which we support. Note new Policy LF-FW-O1A (8) is "direct discharges of wastewater to water bodies are phased out to the greatest extent practicable"	

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
		or to store for reuse or release more slowly. This process will reduce or postpone the need for major reticulation upgrades as climate change brings us increasingly extreme events. We consider proposing improved reticulation services is the role of the district councils. The role of the regional council is more appropriately ensuring that the proposals met the polices and are fit for purpose as the effects of climate change intensify. And again, we consider that the ORC have a role in promoting alternatives to hazardous substances of any kind to reduce the stress on the environment. Some effects of certain substances are still only being discovered after years of use. There is evidence that bee die-back is due to chemical poisoning from herbicides and is a good example of where integrated management has failed. The precautionary principle applies. Some of these more detailed proposals for assessing stormwater and wastewater needs	discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and (2) requiring: (a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, (b) <u>where technically possible,</u> all stormwater to be <u>reintegrated with the natural hydrological process (including groundwater recharge) and if this is not possible,</u> discharged into a reticulated system, where one is available, (c) ~~implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring for reticulated stormwater and wastewater systems,~~ ensure that <u>reticulated stormwater systems have the capacity to manage new weather extremes by introducing appropriate buffering systems and encouraging private rainwater collection within properties for emergency use.</u> (d) on-site wastewater systems to be designed and operated in accordance with best practice standards, (e) stormwater and wastewater discharges to meet <u>or better</u> any applicable water quality standards set for FMUs and/or rohe, and (f) the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and <u>(3) ~~promoting the reticulation of stormwater and wastewater in urban areas.~~ ORC is to identify urban centres which might</u>	The management of hazardous substances primarily occurs under the Hazardous Substances and New Organisms Act 1996 and there are limited circumstances where it is appropriate Section 42A report for the Proposed Otago Regional Policy Statement: Freshwater Planning Instrument 318 for plans developed under the RMA to also manage these substances. In my opinion, Wise Response has not provided sufficient evidence to justify managing hazardous substances in this way and therefore I do not recommend accepting this part of the submission point".	Also new policy in LF-FW-P15 (4) and LF-FW-P16 (4) "promoting source control as a method for reducing contaminants in discharges". New policy LF-FW-P16 (1) "phasing out existing discharges containing sewage or industrial and trade waste directly to water to the greatest extent possible," Also note new outcome requirement LF-FW-AER9: **Direct discharges of wastewater to water are phased out to the greatest extent practicable** and the frequency of wastewater overflows is reduced. That should go a long way to addressing our concerns We not that there is a potential conflict now between LF–FW–P15 (2) (f) and LF–FW–P15 (3). Water sensitive design in many cases avoids reticulation. **We recommend deletion of LF–FW–P15 (3).**	Joy Rennie

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
		may be better placed as methods.	benefit from improved stormwater and wastewater facility and for communities wishing to explore feasibility, ensure that the wider sustainable management and social implications are assessed, including: i) public health issues and potential gains ii) any potential to avoid or contain sprawl that preserves productive land, contains infrastructure costs or preserves pedestrian and cyclist options iii) minimising adverse environmental impact considering the implications of climate change and National emissions reduction policy iv) the potential for better management of the existing arrangement iv) alternative collection, management and disposal systems and the potential to deliver useful resource. v) the cost-of-living and demographic impacts on the current residents vi) the operation and maintenance costs and technical support requirements (4) Where the use of environmentally hazardous substances cannot be entirely avoided, ensure use is essential and actively promote a shift to more benign and biodegradable alternatives			
Freshwater Methods						

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
LF–FW–M6 – Regional plans **KEY POLICY**	Amend	Needs more emphasis on shifting landuse practice to low carbon practice and more resilient enterprise aimed at promoting fastest possible reduction in emissions.	Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and, after it is made operative, maintain that regional plan to: … (4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai by the specified timeframes and provide for: (a) a variable presumptive flow regime above a minimum flow or level for each water body ~~the behaviours of the water body, including a base flow or level that provides for variability~~, (b) healthy and resilient mahika kai, (c) the needs of all indigenous fauna, including taoka species, and aquatic species associated with the water body, (d) the essential need for hydrological connection with other water bodies, estuaries and coastal margins for sustainable resource management, (e) the traditional and contemporary relationship of Kāi Tahu to the water body, and (f) community drinking water supplies, and (5) include limits on resource use that: (a) differentiate between types of uses, including drinking water, and social, cultural and economic uses, in order to provide long-term certainty in relation to those uses of available water, (b) for water bodies that have been identified as over-allocated, provide methods and timeframes for phasing out that over-allocation, (c) control the effects of existing and potential future development on the ability of the water body to meet, or	I do not consider that the level of detail sought by this submitter is appropriate for the pORPS. Decisions about incentivising particular activities (or not) should be made in the development of the LWRP, once values have been identified and environmental outcomes developed. I do not recommend accepting these submission points. "I have previously recommended including the promotion of source control as a method for reducing contaminants in discharges in policies LF-FW-P15 and new LF-FW-P16 as sought by The Fuel Companies. I do not consider any amendments are required to LF-FW-M6 because LF-FW-M6(8) already addresses policies LF-FW-P15 and LF-FW-P16 which contain the direction on promoting source control" The steps of the NOF are set out in detail in the NPSFM and it is inefficient to repeat them in the pORPS. It is also inefficient (and potentially misleading) for some steps to be identified but not others. For that reason, I recommend accepting in part the submission by Beef + Lamb and DIN, deleting clauses (1) to (5) and replacing them with a new clause (1A) as follows: (1A) implement the required steps in the NOF process in accordance with the NPSFM I agree that this policy (LF-FW P10) is relevant and should be included. I recommend accepting this part of the submission point".	We put this additional detail in to try and make sure that the polices were better reflected in the methods. In my view given Jim, Helen and Mike Joy's evidence which highlight an unsustainable intensive agric system, what we are proposing in 9) is the only logical direction to proceed. There are a growing number of farmers successfully doing it (see Mike Joy evidence and Craig Anderson quote in our submission). Our proposal for LF-FW-O1A (2) support (9) (**2) the functional interconnection of land and soil, freshwater (including groundwater) and coastal water is recognised by an integrated management approach (Ki uta ki tai),** Also, at LF-FW-M7(c) **"promote ~~encourage~~ on-site storage of rainfall in soil, wetlands and reservoirs to detain peak stormwater flows, and** LF-WAI-P3 – goes some way to providing a theoretical Mts to the Sea approach but it does not have the basic idea that the real opportunity in enhanced integrated management lies in enhancing soil capacity and matching landscape with the most appropriate landuse. (We acknowledge tho that this is part of the non-FPI process)	Rennie Beattie Lenihan (Anderson)

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			continue to meet, environmental outcomes, (d) <u>avoid or minimise</u> ~~manage~~ the adverse effects on water bodies that can arise from the use and development of land, and …. (7) identify and manage natural wetlands in accordance with LF–FW–P7, LF–FW–P8, ~~and~~ LF–FW–P9, <u>and LF-FW P10</u> while recognising that some activities in and around natural wetlands are managed under the NESF, and <u>(9) actively promote low impact regenerative landuse practice that maximises carbon sequestration, maximises water harvest in soils, aquifers and hence baseflow to rivers, minimises the need for supplementary nutrient and promotes catchment level planning to maximise community resilience.</u>			
LF–FW–M7 – District plans **KEY POLICY**	Amend	Needs more emphasis on shifting landuse practice to low carbon practice and more resilient enterprise aimed at promoting fastest possible reduction in emissions. LF-FW-E3 and PR3 need to reflect these changes in provisions.	Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to: (1) map outstanding water bodies and identify their outstanding and significant values using the information gathered by Otago Regional Council in LF–FW–M5, and (2) include provisions to avoid the adverse effects of activities on the significant and outstanding ~~values of outstanding~~ water bodies <u>and associated values</u>, (3) require, wherever practicable, the adoption of ~~water~~ <u>hydrologically and ecologically</u> sensitive urban design techniques when managing the subdivision, use or development of land, and (4) reduce the adverse effects of stormwater discharges by managing the subdivision, use and development of land to:	"I consider that Wise Response has misunderstood the national direction regarding outstanding water bodies and do not consider the amendment sought to clause (2) would helpfully assist with interpretation or application. I do not recommend accepting this part of the submission point". In my opinion, water sensitive design is a commonly understood term and it would not be helpful for clarity or certainty to amend the term as sought by Wise Response. It is not clear to me what distinction the submitter anticipates by amending "encouraging" to "promoting" in clause (4)(c). I consider that on-site storage is likely to require site-specific assessment before it can be ascertained whether storage is appropriate or not and therefore prefer to retain the wording as notified".	While we understand it is built into the NOF process we are concerned that talking about values of freshwater rather than its health per se is a device to enable you to degrade some waters or certain attributes of water that you do not happen to value at that time. It's a dangerous approach especially when the FMUs have so much power over what is chosen as their vision for the water. Hamish Rennie has addressed the difference between "encourage" and "promote" in his evidence. I think this ORC response is not relevant for the context of developing RPS policy. **Giving the concept behind LF–FW–M7 (5) effect in Regional and District plans is key to the intent of our overall submission.**	Rennie Rennie

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			(a) minimise the peak volume of stormwater needing off-site disposal and the load of contaminants carried by it, (b) minimise adverse effects on fresh water and coastal water as the ultimate receiving environments, and the capacity of the stormwater network, (c) promote ~~encourage~~ on-site storage of rainfall in soil, wetlands and reservoirs to detain peak stormwater flows, and (d) promote the use of permeable surfaces. (5) actively promote low impact regenerative landuse practice that maximises carbon sequestration, maximises water harvest in soils, aquifers and hence baseflow to rivers, minimises the need for supplementary nutrient and promotes catchment level planning to maximise community resilience. (6) Give practical effect to all the relevant freshwater policies			
LF- FW-M15A New Policy	New Policy to use management practices that avoid the polluting side effects of potentially hazardous substances.	People in the region need to avoid pollution of land, water and air. It must be demonstrated to the ORCs satisfaction that there are no other effective alternatives available that would minimise or avoid the need to use hazardous chemical substances.	Insert new Policy Regional and district plans are to require the use of potentially harmful chemical substances to be fully justified and if use is approved, any polluting side effects will be monitored and reported on.	The use of individual substances is not a matter for a regional policy statement – the discharge of contaminants, including hazardous substances, is controlled by regional plans. I am unsure what Wise Response considers to be 'fully justified'. I do not recommend accepting this submission point.	Something would need to go in the subordinate plan to require the proponent to demonstrate that. Again, how do you encourage the use of more benign farming practice if not with this kind of requirement. We note again this new policy in LF-FW-P15 (4) and LF-FW-P16 (4) "promoting source control as a method for reducing contaminants in discharges".	Rennie
Anticipated environmental results	Support with amendment		LF–FW–AER4 Fresh water is allocated within limits that contribute to achieving specified environmental outcomes for water bodies within timeframes set out in regional plans that are no less stringent than the timeframes in the LF–VM section of this	"I do not consider that the amendment sought by Wise Response to LF-FW-AER4 is necessary as it does not describe the result expected from implementing the provisions of this chapter. I consider that the provisions of the LF chapter give effect to national direction and note that regional plans are required by the RMA to give effect to regional policy statements. I do not recommend accepting this submission point"	The ORC provision now reads: "There is ~~no reduction~~ an improvement in the extent or ~~quality~~ condition of Otago's natural wetlands". To be consistent with our "environmental gain" call and our policy recommendations at LF-FW-O1A I suggest we recommend "There is ~~no reduction an~~ improvement in the extent **and** ~~or~~ ~~quality~~ condition of Otago's natural wetlands.	Rennie Joy

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			chapter and meet all RPS and National policies and standards. LF–FW–AER5 Specified rivers and lakes are suitable for primary contact within the timeframes set out in LF–FW–P7. LF–FW–AER6 Degraded water quality is improved so that it meets specified environmental outcomes within timeframes set out in regional plans that are no less stringent than the timeframes in the LF–VM section of this chapter. LF–FW–AER7 Water in Otago's aquifers is suitable for human consumption, unless that water is naturally unsuitable for consumption. LF–FW–AER8 Where water is not degraded, there is no reduction in water quality. LF–FW–AER9 The frequency of wastewater overflows is reduced. LF–FW–AER10 The quality of stormwater discharges from existing urban areas is improved. LF–FW–AER11 There is a steady gain ~~no reduction~~ in the extent or quality of Otago's natural wetlands.	"I agree with Silver Fern Farms that LF-FW-AER11 does not reflect the content of the policies. I consider that "no reduction" should be replaced with "an improvement" to address this. I recommend accepting this submission point in part. I consider this also addresses the submission points of Wise Response and DairyNZ and recommend accepting them in part".		
Land and Soil						
LF–LS – Land and soil Objectives						
LF–LS–P18 – Soil erosion **KEY POLICY**	Support with amendment	Improving soil structure with increased organic matter will reduce erosion.	Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by: (1) implementing effective management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to water bodies, including by controlling the timing, duration, scale and location of soil exposure,	"As described in Wise Response's submission, improving soil structure will enhance soil retention. For this reason, I consider explicit reference to soil structure in clause (3) is not necessary, as it is already captured by the notified wording, alongside other practices that will enhance soil retention. I recommend rejecting the Wise Response submission point.	We do not disagree with the ORC response. Other methods of reducing erosion are addressed in the subclauses above so adding soil structure does not preclude them. The need to build structural strength/cohesion is a primary requirement to reduce risk of suspension of soil particles. It has the additional advantage of encouraging soil management practices known to build soil attributes for other benefits (drought resistance, fertility etc). Proposed amended wording to address ORC concern. **(3) promoting land management activities that enhance soil retention and water infiltration,**	(Anderson)

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			(2) maintaining vegetative cover on erosion-prone land, and (3) promoting activities that enhance soil retention and soil structure		**including building and preserving soil structure and avoiding compaction**	
LF–LS–P21 – Land use and fresh water **KEY POLICY**	Amend	Ensuring FMUs objectives and policies are consistent or better than other regional or national policy. Making the link between landuse and water quality clearer.	Achieve the improvement or maintenance of fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe and consistent with other regional and national policy by: (1) ~~reducing~~ enforcing direct and indirect discharge standards of contaminants to water from the use and development of land, and (2) actively promoting ~~managing~~ land uses and land use management that may have beneficial ~~adverse~~ effects on the flow of water in surface water bodies or the recharge of groundwater.	"I do not consider that the amendment sought by Wise Response to include reference to other regional and national policy is necessary. The Council has a range of obligations to meet under the RMA, including responding to the direction in other policy instruments in the manner set out in the RMA. I recommend rejecting this submission point". "I do not recommend accepting the submission point by Wise Response seeking to reference the enforcement of discharge standards. Not all contaminants may be subject to standards, and not all contaminant discharges may be sufficiently measurable to determine compliance. The submitter has also sought to refocus clause (2) from managing land uses to actively promoting their beneficial effects. It is unclear how this promotion might occur, and what guidance there would be for activities that have adverse effects. I recommended rejecting the submission point".	We think it is possible to distinguish between enforcing standards for measurable contaminants, and accepting some contaminants cannot be measured effectively. Requiring compliance will lead to benefits across most other contaminants as well. We confirm this position "enforcing" etc provides a clearer directive. Its up to Councils to develop suitable compliance methods – one option being through Farm Plans. Regarding "actively promoting" etc This is again aimed at giving wording teeth and making it active rather than passive. What does "managing" need to mean, other than status quo? This also aligns really well with our call for integrated catchment management and a move to farming based on a living soil not a Petrie dish! **We think the above are all good and important recommendations for this policy so we reconfirm them.**	Rennie
Methods LF–LS–M11 – Regional plans **KEY POLICY**	Amend	Better control over supplementary nutrient required and linking systems with national zero carbon goals.	Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and then, when it is made operative, maintain that regional plan to: (1) manage land uses that may affect the ability of environmental outcomes for water quality to be achieved by requiring: (a) the development and implementation of certified freshwater farm plans as required by the RMA and any regulations, (b) the adoption of practices that reduce the risk of sediment and nutrient loss to water, including by minimising the use of synthetic fertilizer and area and duration of exposed soil, using buffers, and actively managing critical source areas,	While I agree with Wise Response that minimising the use of supplementary nutrients is a means to reduce nutrient losses to water, I am unsure how this would be implemented given that supplementary nutrients could include both artificial and natural fertilisers, as well as nutrient supplements fed directly to stock. In addition, the use of supplementary nutrients in some circumstances may aid in reducing nutrient losses to water, rather than increase those losses, as implied by the submitter. I consider that specific management of nutrient inputs is best managed by the regional plan, alongside the synthetic nitrogen provisions in the NESF. I recommend rejecting the submission point". "In relation to Wise Response's amendments sought to clause (2), I consider it is not clear what 'active promotion' would look like in practice, nor how the relevant land use changes that are compatible with net zero carbon goals would be identified. I recommend rejecting this submission point".	The ORC response is not responding to synthetic fertilizer but nutrients at large. We cannot think of a circumstance when supplementary nutrients might actually reduce nutrient losses to freshwater. The new policy in LF-FW-P15 (4) and LF-FW-P16 (4) is "promoting source control as a method for reducing contaminants in discharges". In principle, what is the difference in that policy and asking for the equivalent with synthetic nitrogen given that we have clearly exceeded a limit with it? We don't understand why the difference between "provide for" and "actively promote" is not clear. If our recommendation for LF-FW-O1A is accepted ie "(9) all freshwater use is for activities compliant with national and formal international emissions reduction and biodiversity goals" then the recommended policy could be shortened to:	

Provision`	Support/oppose	Reasons	Decision requested	ORC s42 response	Reviewed Society Position	Evidence
			(c) effective management of effluent storage and applications systems, and (d) earthworks activities to implement effective sediment and erosion control practices and setbacks from water bodies to reduce the risk of sediment loss to water, and (2) Actively promote ~~provide for~~ changes in land use and landuse management that improve the sustainable and efficient allocation and use of fresh water, for systems compatible with national emissions reduction policy and (3) implementation of policies LF–LS–P16 to LF–LF–P22.		**2) Actively promote ~~provide for~~ changes in land use and landuse management that improve the sustainable and efficient allocation and use of fresh water ~~for systems compatible with national emissions reduction policy~~ and …** One way or another that objective would need to be reflected in policy and or methods.	
LF–LS–AER14	Amend		The use of land supports the achievement of environmental outcomes that achieve sustainable management and objectives in Otago's FMUs and rohe.	The ORC have not commented on this recommendation	We think it is helpful to have AER state what the purpose of the Act is.	Rennie