

Regional Leadership Committee

8 November 2023



Meeting will be held in the Council Chamber at Level 2, Philip Laing House
 144 Rattray Street, Dunedin
[ORC Official YouTube Livestream](#)

Members:

Michael Laws (Co-Chair)
 Cr Bryan Scott (Co-Chair)
 Cr Elliot Weir (Co-Chair)
 Cr Alexa Forbes
 Cr Gary Kelliher
 Mr Hoani Langsbury
 Cr Lloyd McCall
 Cr Kevin Malcolm
 Cr Tim Mephram
 Cr Andrew Noone
 Cr Gretchen Robertson
 Cr Alan Somerville
 Cr Kate Wilson

Senior Officer: Richard Saunders, Chief Executive

Meeting Support: Trudi McLaren, Governance Support Officer

08 November 2023 02:30 PM

Agenda Topic	Page
1. WELCOME	
2. APOLOGIES Apologies received from Cr Bryan Scott.	
3. CONFIRMATION OF AGENDA Note: Any additions must be approved by resolution with an explanation as to why they cannot be delayed until a future meeting.	
4. DECLARATION OF INTERESTS Members are reminded of the need to stand aside from decision-making when a conflict arises between their role as an elected representative and any private or other external interest they might have. ORC Councillor interests are published on the website.	
5. CONFIRMATION OF MINUTES That the minutes of the (public portion of the) Regional Leadership Committee meeting held on 10 August 2023 be received and confirmed as a true and accurate record.	3

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	To provide an update on implementation activities related to the Freshwater Farm Plan (FWFP) rollout in Otago.	
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8.	CLOSURE	



Regional Leadership Committee MINUTES

Minutes of an ordinary meeting of the Regional Leadership Committee held in the Council Chamber, Level 2 Philip Laing House, 144 Rattray Street, Dunedin on Thursday 10 August 2023, commencing at 10:00 AM (delayed due to inclement weather).

PRESENT

Cr Elliot Weir (Co-Chairperson)
Cr Bryan Scott (Co-Chairperson)
Cr Michael Laws (Co-Chairperson)
Cr Alexa Forbes
Cr Gary Kelliher
Mr Hoani Langsbury
Cr Kevin Malcolm
Cr Lloyd McCall
Cr Tim Mephram
Cr Andrew Noone
Cr Gretchen Robertson
Cr Alan Somerville
Cr Kate Wilson

1. WELCOME

Chairperson Weir welcomed Councillors, Mr Hoani Langsbury (online), and members of the public and staff to the meeting at 9:00am and opened the meeting with a karakia. Staff present included Richard Saunders, (Chief Executive), Pim Borren (Acting GM Transport), Nick Donnelly (GM Corporate Services), Anita Dawe (GM Policy and Science), Joanna Gilroy (Acting GM Regulatory), Gavin Palmer (GM Operations) Amanda Vercoe (GM Governance, Culture and Customer), Alexandra King (Acting Manager Consents) and Trudi McLaren (Governance Support)

2. APOLOGIES

Resolution: Cr Weir Moved, Cr Robertson Seconded:

That the apologies for Cr Wilson for leaving the meeting early be accepted.

MOTION CARRIED

3. PUBLIC FORUM

No requests to address the Committee under Public Forum were received.

4. CONFIRMATION OF AGENDA

The agenda was confirmed as published.

5. DECLARATIONS OF INTERESTS

No changes to Councillor Declarations of Interests were noted.

6. CONFIRMATION OF MINUTES

Resolution: Cr Wilson Moved, Cr Somerville Seconded

That the minutes of the (public portion of the) Council meeting held on 10 May 2023 be received and confirmed as a true and accurate record.

MOTION CARRIED

7. OPEN ACTIONS FROM RESOLUTIONS OF THE COMMITTEE

Open actions from resolutions of the Committee were reviewed. No changes were noted.

8. MATTERS FOR CONSIDERATION

8.1. Consents Fee Support

The purpose of the report was to update the Committee on the activities that had been funded under the Consents Fee Support Fund from 1 July 2022 to 31 June 2023. Joanna Gilroy (Acting GM Regulatory) and Alexandra King (Acting Manager Consents) were present to take questions.

Hoani Langsbury was not present for this item due to a conflict of interest.

Councillors requested that it be recorded that this is an excellent initiative and that it was good to see the amount of diversity in the projects.

Resolution RLC23-108: Cr McCall Moved, Cr Wilson Seconded

That the Regional Leadership Committee:

1. **Notes** the update on consent applications that received funding support in the 2022/23 financial year and that no changes are proposed to the policy.

MOTION CARRIED

8.2. Regulatory Group Update - Quarterly Update Report

This paper was to update the Committee on activities of the Regulatory Group between 1 July 2022 and 30 June 2023. Joanna Gilroy (Acting GM Regulatory), Alexandra King (Acting Consents Manager), Tami Sargeant (Manager Compliance) and Simon Wilson (Manager Regulatory Data and Systems) were present to give background and answer questions.

Cr Wilson left the meeting at 10:29am.

Resolution RLC23-109: Cr Robertson Moved, Cr Malcolm Seconded

That the Regional Leadership Committee:

1. **Notes** the Quarterly Update Report from the Regulatory Group.

MOTION CARRIED

8.3. Freshwater Farm Plans

This paper provided a background on Freshwater Farm Plans (FWFPs) and the proposed approach to the implementation of FWFPs in Otago. Libby Caldwell (Manager Environmental Implementation) and Joanna Gilroy (Acting GM Regulatory) were present to answer questions.

Chief Executive Richard Saunders noted to the Councillors that this paper proposes a significant change to the current approach and confirmed that the ORC is responsible for implementation across the region.

Cr Wilson returned at 11:24am.

Cr Scott left the meeting at 11:28am.

Cr Scott returned at 11.30am.

Resolution RLC23-110: Cr Weir Moved, Cr Malcolm Seconded

That the Regional Leadership Committee:

1. **Notes** this report, implementation plans, and the complexity of work associated with delivering the freshwater farm plan system for Otago.

MOTION CARRIED**8.4. Engagement Approach to Long-Term Plan**

This paper detailed the planned engagement approach for the Otago Regional Council's (ORC) Long Term Plan (LTP) 2024-34, which included different engagement approaches with mana whenua, strategic stakeholders, and region-wide community engagement. Nick Donnelly (GM Corporate Services and CFO), Andrea Howard (Manager Executive Advice) (online) and Mike Roesler (Manager Corporate Planning) were present to speak to the paper and answer questions.

Cr Mephram left the meeting at 12:10pm.

Resolution RLC23-111: Cr Scott Moved, Cr Somerville Seconded

That the Regional Leadership Committee:

1. **Notes** Council (including both councillors and staff) will engage with mana whenua, strategic stakeholders, and undertake region-wide community engagement as part of developing the Long-Term Plan 2024-34.
2. **Notes** that feedback from engagement opportunities will inform the advice coming to Council on the draft LTP development.
3. **Notes** that Council will be provided with a paper to consider communications options for the formal LTP consultation/SCP in late September 2023.

MOTION CARRIED**9. CLOSURE**

There was no further business and Chairperson Weir closed the meeting with karakia at 12:26pm.

Chairperson

Date

7.1. Regulatory Quarterly Report

Prepared for:	Regional Leadership Committee
Report No.	GOV2338
Activity:	Regulatory Quarterly Update
Author:	Alexandra King, Acting Consents Manager; Steve Rushbrook, Harbourmaster; Simon Wilson, Manager Regulatory Data and Systems and Tami Sargeant, Manager Compliance
Endorsed by:	Joanna Gilroy, Acting GM Regulatory
Date:	25 October 2023

PURPOSE

- [1] To update the Committee on activities of the Regulatory Group between 1 July 2023 and 30 September 2023.

EXECUTIVE SUMMARY

- [2] This report summarises the activity of the Regulatory Group which includes Consents, Compliance, Harbourmaster and the Regulatory Data and Systems teams.

RECOMMENDATION

That the Regional Leadership Committee:

- 1) **Notes** the Quarterly Update Report from the Regulatory Group.

DISCUSSION

- [3] The following report provides a summary of the activity of each team within the Regulatory Group.
- [4] Attachment 1 contains statistics on Regulatory Group activity for the period 1 July 2023 to 30 September 2023. This is a new attachment, with some data now shown spatially.

CONSENTS

Consent Processing

- [5] In the reporting period 170 applications have been received, compared to 167 at the same time in the previous year. This shows a consistent workload for the team, which was handled exceptionally well.
- [6] Decisions were made on 220 individual consents (cumulative total) this quarter. For context, by the same time in the previous year decisions were made on 211 individual consents. There has been a consistent number of decisions made on applications compared to last year.
- [7] Map 1 in the Appendix shows the spread of consents granted for the period 1 July 2023 to 30 September 2023 throughout Otago. Of note are the surface water takes in the Manuherehia catchment which aligns with the staged approach to deemed permit replacements. There has also been a number of discharge to land permits granted

throughout Otago shown in Map 1, which will be a combination of discharged human wastewater and animal effluent.

- [8] 100% of consents processed in the reporting period were within timeframes. Not only does this ensure Council complies with the timeframes specified in the Resource Management Act 1991, it also means that the team remains on track to meet their service delivery target as set out in the Annual Plan. Timeframe extensions were used in this period in most cases to enable the applicant to review the proposed conditions.
- [9] Applications for consents for surface water takes, bores, general land use activities and discharges to land were the main types of consents processed by the team during the reporting period.
- [10] Consent processing is predominantly undertaken by internal staff. Consultants are only used on an as required basis and still account for less than 10% of workload processing. This is generally for applications for large scale or long-term projects and where Council is the applicant.
- [11] One application was publicly notified in the reporting period. This related to a boat shed in Taieri Mouth. Submissions on this have now closed and the application is on hold.
- [12] A summary of consents statistics is included in Figures 1 to 6 of Attachment 1.

Deemed Permit Replacements

- [13] Deemed Permits and many water permits to take and use water in the region expired on 1 October 2021. Most of these permits are in Central Otago (including the Taieri catchment) and Queenstown Lakes Districts. Replacement applications for these permits were primarily lodged in 2020 and 2021.
- [14] Staff have been working collaboratively with consultants and applicants to process deemed permit related applications. Great progress has been made by all parties, with decisions made on 131 applications from 1 July 2021 to 30 September 2023. The status of the remaining 7 applications is shown in Table 1 below:

Table 1: Status of consent applications for deemed permit replacements:

Status	Number of applications
Awaiting amendment to be lodged	2 (joint applicant) – expecting amendment to be lodged in October
May be withdrawn	1
With applicant – resolving outstanding issues	4

- [15] Table 2 shows the decisions that have been made since July 2021 for deemed/water permit replacements. There have been a steady number of decisions made in the second half of 2022 and first half of 2023.

Table 2: Number of consent decisions related to deemed permit replacements.

Month	Number of deemed permit and surface water replacement decisions on applications lodged pre-1 October 2021	Number of decisions on surface water permit replacement applications lodged post-1 October 2021	Total decisions
July 2021	0	0	0
August 2021	4	0	4
September 2021	6	2	8
October 2021	4	0	4
November 2021	3	0	3
December 2021	0	1	1
January 2022	2	1	3
February 2022	4	1	5
March 2022	7	1	8
April 2022	3	0	3
May 2022	3	1	4
June 2022	1	0	1
July 2022	13	0	13
August 2022	10	0	10
September 2022	6	2	8
October 2022	4	2	6
November 2022	5	1	6
December 2022	8	1	9
January 2023	5	2	7
February 2023	6	3	9
March 2023	0	1	1
April 2023	0	6	0
May 2023	5	4	9
June 2023	0	1	1
July 2023	0	0	0
August 2023	2	1	3
September 2023	2	2	3
Total	103	33	131

Appeals, objections, and reviews

- [16] No appeals or objections on consent decisions were received during the reporting period.
- [17] One formal cost objection was received under Section 357B of the RMA in the reporting period. This relates to an earthworks consent application, and we are currently working through this matter. Clearly communicating costs and being able to invoice as quickly as possible post a decision on an application remains a focus for the team. This includes working with Council's Finance team on invoicing.
- [18] There are currently no reviews being processed.

Public Enquiries

- [19] Responding to public enquiries remains a significant part of the workload of the Consents Team. In the reporting period, 785 enquires have been received and responded to, with a peak of 304 in August. Most enquiries are resolved within two days of being received, with the remaining generally within the three to seven days. Information on these enquiries can be seen in Attachment 1. The large number of public enquiries responded to demonstrate the value of this service provided by ORC.
- [20] Requests for copies of documents, as well as information about discharges to land, farming activities and consent process enquiry are the most common enquiry types. The main method for requests is email.
- [21] The Public Enquiries team have been responding to requests for comments on applications that are seeking to use the 'Fast Track' process provided by the COVID-19 Recovery (Fast-Track Consenting). Proposals in Otago under this process (run by the EPA) that progressed in the last quarter of the financial year included:
- a) New Dunedin Hospital Inpatient Building – Stage 3.
 - b) Wooing Tree Stage 4, Cromwell; and
 - c) Southland Windfarm Project by Contact Energy, Oware Southland.
- [22] To enhance the public enquiries service, as well as the other projects reported to date staff have led, are working on or finalised:
- a) Farm effluent FAQs for the website.
 - b) Farm effluent workshops in North and South Otago.
 - c) A water take guideline document for compliance and the website.
 - d) Updates to the pre-application section on the website to make it more user friendly.
 - e) New consent application forms and internal templates for wetland creation.
 - f) National Built and Environment Act updates both to website, application forms, emails to key stakeholders and consultants. We have also created internal templates and processes.
 - g) Attended Land and Water Plan drop-in sessions.
- [23] All the above projects help us deliver an improved customer experience for users of the consent or public enquiries services. This work is balanced against chargeable work and is completed within an existing work programme.

COMPLIANCE MONITORING AND ENFORCEMENT**Performance Monitoring**

- [24] Performance monitoring returns include all information Consent Holders are required to submit by conditions in their resource consents. This includes photographs of work, water meter returns, complex annual reports, and management plans. Some consents require multiple submissions of performance monitoring per year, for example monthly water quality results, while others have no performance monitoring requirements. The grading of performance monitoring tends to be faster than a full audit and is used to help the Compliance Team prioritise which consents require audits.
- [25] In the reporting period, the Regulatory Data and Systems and Compliance teams graded 1,892 performance monitoring returns against a target of 1,350. This is down on the 2,175 returns graded in the same period last year. This is still a high level of work and the reduction was driven by recruitment within the team. The numbers reached in 2022/23 were also well up on previous years. By comparison we graded 1,766 PM returns in Q1 of 2021/22 and 1,788 returns in Q1 of 2020/21.
- [26] A summary of performance monitoring data for 2023/24 is set out in Figures 7 and 8 of Attachment 1. The geographic spread of monitoring can be seen in Map 4 of Attachment 1.

ORC compliance audits and inspections

- [27] The ORC Long-Term Plan 2021-2031 includes a performance measure of meeting 90% or more of 'programmed inspections/audits completed each year, as per the Compliance Audit and Performance Monitoring Schedule'.
- [28] In the reporting period, 254 on site audits and inspections were completed. The inspections relate to 233 consent audits, and 21 forestry inspections. This is 105% of the planned compliance audits or field inspections programmed for the 2023/24 year.
- [29] A summary of the compliance field visits and inspections compared with the 2022/23 year and Annual Plan target is set out in Figures 9 and 10 of Attachment 1.

RMA consent audits

- [30] In the reporting period, 233 on site consent audits have been completed. Compliance with consent conditions can be considered high, with most consents being considered either fully compliant (80 consents), or low risk non-compliance (69 consents). Consents are graded as low risk non-compliance when there is a likely low risk of adverse environmental effects or is technical in nature (e.g., failure to submit a monitoring report).
- [31] All consent audits graded with moderate non-compliances (33 consents) and significant non-compliances (15 consents) have been followed up by staff and either appropriate action has been taken in line with the RMA Compliance and Enforcement Policy, or investigations are continuing. Most of the significant non-compliances related to discharge to land permits.

- [32] Map 3 of Attachment 1 shows the spread of consents that have been audited throughout Otago. A summary of RMA consent audit data in the 2023/24 year is set out in Figures 11 and 12 of Attachment 1.

Plantation Forestry

- [33] In the reporting period, ORC received 43 forestry notifications and 13 management plans. Most of the forestry notifications in July and August related to afforestation. A compliance risk assessment is undertaken on forestry management plans, and on-site inspections are undertaken where appropriate to check compliance on-the-ground. Compliance staff completed 21 on site forestry inspections in the reporting period.
- [34] Overall compliance is good, with ten forestry sites graded fully compliant and nine forestry sites graded low-risk non-compliance. One forestry site was graded moderate non-compliant, and one forestry site was graded significant non-compliant. Reasons for non-compliance related to limited sediment controls, slash left within flow paths and disturbing the bed of a waterway. These matters were followed up by staff and corrective actions were made by the forestry operators.
- [35] Compliance staff actively engage with the forestry sector to encourage best practice in forestry management. This includes regular correspondence and information on forestry rules and participating in a Southern Forestry Environmental Working Group.
- [36] A summary of 2023/24 forestry notifications and inspections data is set out in Figures 14 and 15 of Attachment 1.
- [37] Central Government has replaced the National Environmental Standard for Plantation Forestry (NES-PF) with the National Environmental Standards for Commercial Forestry (NES-CF), with most of the regulations commencing from 3 November 2023. The NES-CF manages the environmental effects of plantation forestry and exotic continuous-cover forestry (sometimes called carbon forestry). ORC compliance staff are working with the forestry sector and MPI (Ministry for Primary Industries) to implement the changes.

Environmental pollution incidents

- [38] In the reporting period, 377 service requests were received on the pollution response hotline, resulting in 345 incidents being generated. This is down from 455 service requests in the same reporting period in the 2022/23 year. The most common reasons for requests related to outdoor burning (90), water pollution (72), and odour (52).
- [39] Map 5 of Attachment 1 shows pollution incidents have occurred throughout the Otago region. Geographically, the spread of incidents across the districts is as follows: Central Otago (8%), Clutha (12%), Dunedin (44%), Queenstown Lakes (24%) and Waitaki (13%).
- [40] The majority, (56%) of the pollution incidents required a field inspection to assess compliance and investigate, and 44% of the pollution incidents were assessed and resolved through desktop analysis.
- [41] Most pollution incidents are responded to on the same day the service request is received by ORC. The ORC regulatory system does not automatically record response time and requires system upgrades to enable the automatic capture of this data and is not up to an auditable level. This means accurate reporting, as well as any change to

level of service measures will be available from 2025 when ORC moves to a new regulatory system.

- [42] Further details on pollution incidents and responses in the 2023/24 year to date, can be found in Figures 16 and 17 of Attachment 1.

Investigations and enforcement action

- [43] Following discussion at the Regional Leadership Committee on 10 May 2023, additional information on formal enforcement action has been provided in this report and will be included in quarterly regulatory reports moving forward. This includes information on the geographical distribution of, and types of offences and alleged offenders. ORC is bound by the Crown Law's "Media Protocol for Prosecutors" which places certain restrictions on disclosing the identity of a defendant. By analogy, the ORC takes a similar approach to lesser offending where individuals and organisations have appeal rights available to them.
- [44] All enforcement action is taken in accordance with the RMA Compliance and Enforcement Policy. The RMA Compliance and Enforcement Policy approved by Council sets out the approach and principles by which the ORC promotes and enforces compliance with the RMA and provides an outline of how RMA compliance and enforcement is managed.
- [45] ORC has robust checks and balances in making enforcement decisions. Once an Enforcement Officer has completed an investigation into an incident or significant consent non-compliance, the Officer will recommend a form of enforcement action and present the same to the Enforcement Decision Group (EDG) for consideration. This process supports a consistent approach to the enforcement decision-making process, as well as assurance checks and ensuring any actions are independent of personal or political influence.
- [46] In the reporting period, ORC issued 32 formal enforcement actions, including 14 infringement notices, 14 abatement notices, and four formal warnings.
- [47] Map 6 of Attachment 1 indicates the location of the incidents related to the formal enforcement action. It should be noted that some incidents resulted in multiple enforcement actions. For example, issuing multiple infringement notices to multiple parties; and issuing an abatement notice and infringement notice for the same incident.
- [48] In the reporting period, ORC issued 14 infringement notices. Eight infringement notices were paid within time limits and ten are yet to be paid and are within relevant time limits. One infringement notice has been withdrawn after reviewing additional evidence provided by the alleged offender, and one has been lodged with the Ministry of Justice as unpaid and being dealt with through the Courts. Geographically the spread of infringement notices across the districts is as follows: Clutha (2), Dunedin (6), Queenstown Lakes (4) and Waitaki (2).
- [49] In the reporting period ORC issued 14 abatement notices. Geographically the spread of abatement notices across the districts is as follows: Clutha (6), Dunedin (2), Queenstown Lakes (2) and Waitaki (4).

- [50] No abatement notices have been cancelled in the reporting period. ORC staff continue to monitor compliance with the conditions of abatement notices, and work with the parties to achieve compliance and improved environmental outcomes.
- [51] For the reporting period, no new prosecutions or environmental legal proceedings have been authorised. There are four current matters at various stages in the Court proceedings process. In August 2023, City Care Limited was sentenced in relation to five wastewater discharges and one odour discharge from non-compliant Clutha District Council wastewater treatments plants identified in December 2019.
- [52] The most common RMA breaches that led to formal enforcement action in the reporting period related to contaminant discharges to land that could enter water (section 15(1)(b)), contaminant discharges to air, or into or onto land (section 15(2A)), and alteration or disturbance of waterways (section 13).
- [53] In the reporting period, formal enforcement actions were taken against 18 companies, six individuals, four territorial authorities, one trust, and one corporate body. Some parties received multiple enforcement actions for the same incident (e.g., infringement notice and abatement notice, and some parties were involved in multiple incidents.
- [54] A summary of formal enforcement action in the year to date can be found in Figures 18 and 20 of Attachment 1.

Abattoir and Homekill Project

- [55] Following significant non-compliance identified at a meat processing plant that led to prosecution proceedings, a proactive abattoir and homekill project was undertaken by the ORC Investigations Team.
- [56] The purpose of this project was to investigate known abattoirs and homekills in the Otago Region to:
- a) Assess compliance with the RMA regulations and regional plan rules; and
 - b) Ensure proper containment and disposal of the waste from their processing operations.
- [57] An initial desktop analysis was undertaken, and compliance visits were undertaken of potentially high-risk abattoir and homekill operators across Otago that did not hold ORC consents and may be operating under permitted activities. Several sites were no longer trading.
- [58] Following the site visits and desktop analysis, compliance was assessed by Investigations staff. All 18 operating abattoirs and homekill businesses visited were properly containing and disposing of the waste from their processing operations and are fully compliant with the RMA regulations and regional plan rules.

Compliance engagement and education activities

- [59] To support and enable compliance, ORC compliance staff work proactively with landowners, consent holders, and the community to engage on compliance matters and educate on good practices.
- [60] Engagement and education activities that have been undertaken by the Compliance team include:

- a) Contacting developers and earthworks contractors in advance of adverse weather conditions, encouraging them to check sediment controls are in place and functioning properly.
- b) Proactive media release advising farmers of potential impacts of an El Niño summer and its effects on farm operations, soil moisture, and water supplies.
- c) In conjunction with the other Regulatory teams, sending out the Regulatory e-newsletter in September to environmental consultants and regulatory practitioners, providing updates on the Natural Built and Environment Act and Freshwater Farm Plans.
- d) Presenting at the Downer NZ tailgate meeting on the importance of protecting waterways and practical advice on sediment and chemical controls.
- e) Media release recognising Otago dairy farmers for their efforts in complying with the nitrogen reporting regulations for July 2023.
- f) Social media campaign promoting the Pollution Hotline.
- g) Media release on compliance flyovers undertaken across the Otago region in July.
- h) Attending Water Plan drop-in sessions throughout Otago.
- i) Supporting the 'Burn dry, breathe easy' campaign, encouraging people to burn dry firewood.
- j) Sending out educational letters to alleged offenders in relation to domestic chimney and outdoor burning complaints.

HARBOURMASTER

Major Incidents

- [27] ORC's long -term plan metrics include a requirement for major incidents to be reported to Council. This incident reporting is included as part of the quarterly update reports. Major incidents can be considered incidents which have the potential to result in one or more of the following:
- a) Significant adverse effects to the environment.
 - b) Pose significant risks to health and safety; and
 - c) Significant navigational safety issues.
- [28] There are no major incidents to report for this period. On 11 October the vessel SANDRA K sank at the berth in Careys Bay. This prompted a tier 2 oil spill response. As of 26 Oct the situation is ongoing and the vessel is being salvaged. A full report will be supplied for the next reporting period.
- [29] In support of the navigational safety bylaws our infringement and enforcement regime finally gained approval from the minister. These became live as of 28 September 2023. A paper for Council is being prepared relating to delegations under this legislation.
- [30] The Harbourmaster and Deputy Harbourmaster both took the opportunity to attend some simulator training with the pilotage team from Port Otago, a rare opportunity afforded to us by Port Otago and a great opportunity to learn about the intricacies of navigating large vessels within Otago Harbour.
- [31] Following some feedback from small commercial operators, we have adjusted 4 buoy positions in the eastern Channel this period.

- [32] The media campaign for safer boating throughout the region has been agreed for this year. This campaign will ramp up as we head into Summer. The Harbourmaster Facebook page continues to grow from strength to strength and is providing a great avenue for specific boating information sharing.
- [33] The Harbourmaster team attended the Port Chalmers Seafood festival, this provided a good opportunity to engage with the public.
- [34] An oil spill exercise was held on 26 September. Along with our own ORC team we had Maritime New Zealand in attendance and a good turnout of outside contractors.
- [35] We continue to support the environmental monitoring team with sampling and buoy maintenance on Lake Wakatipu, Lake Wanaka, Lake Hawea, Lake Hayes and Lake Dunstan.

OPTIONS

- [36] As this is a report for noting there are no options.

CONSIDERATIONS

Policy Considerations

- [37] There are no policy considerations.

Financial Considerations

- [38] There are no financial considerations.

Significance and Engagement

- [39] As this is a report for noting consideration of the Significance and Engagement Policy is not required.

Legislative and Risk Considerations

- [40] A number of legislative requirements govern the activities of the Regulatory Group.
- [41] There are a number of legal and reputational risks associated with the delivery of ORC's regulatory functions.

Climate Change Considerations

- [42] There are no climate change considerations associated with this report.

Communications Considerations

- [43] Communication with the Otago community occurs on a regular basis to educate and inform people on regulatory matters. This includes a quarterly regulatory newsletter which is aimed at informing RMA professionals on technical matters and relevant updates.

NEXT STEPS

- [44] Regulatory activity will continue and will be reported quarterly to the Regional Leadership Committee.

ATTACHMENTS

1. Attachment 1 July 2023 to 30 September 2023

1. Attachment 1 July 2023 to 30 September 2023 [7.1.1 - 17 pages]

Attachment 1: REGULATORY REPORT FOR THE PERIOD 1 JULY 2023 TO 30 SEPTEMBER 2023

Consents

Figure 1: Resource Consent Applications Received

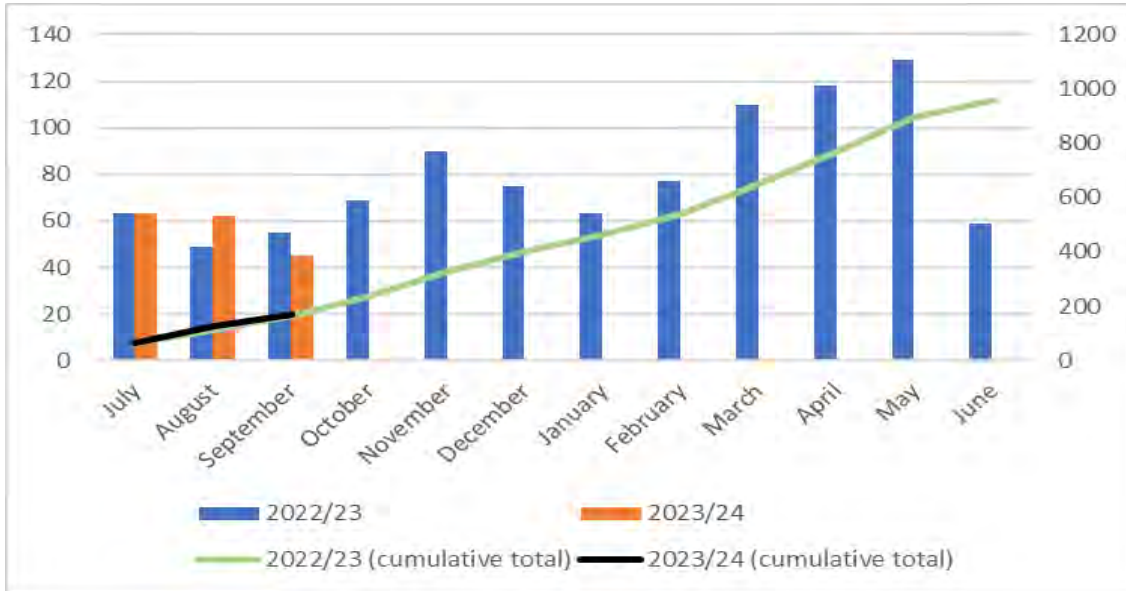
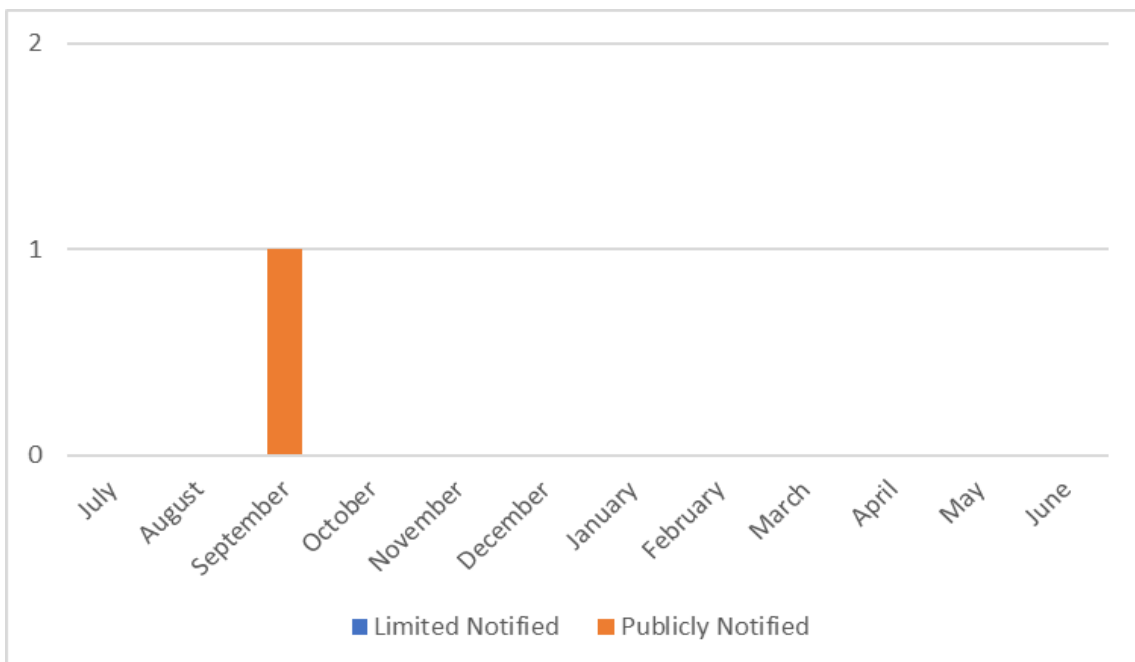
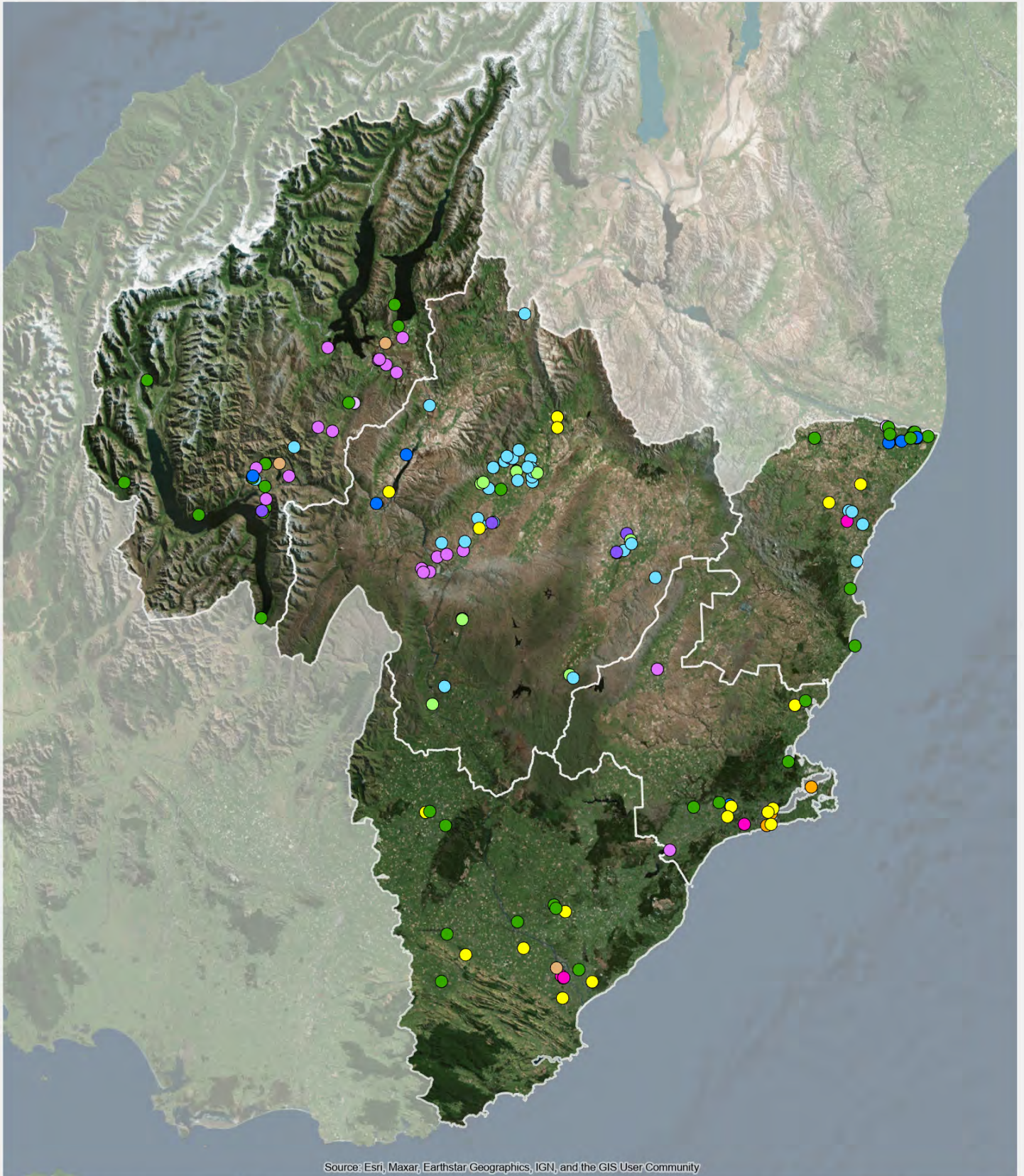


Figure 2: Notified Applications



Map 1 – Consents Issued

From 1st July 2023 to 30th September 2023



Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community

- | | | |
|----------------------------------|---------------------------------|----------------------------------|
| ● Bore Construction Consent (21) | ● Discharge to Land Permit (47) | ● Groundwater Take Permit (9) |
| ● CMA Use Permit (5) | ● Discharge to Water Permit (9) | ● Land Use Consent (42) |
| ● Coastal Discharge Permit (1) | ● Divert Water Permit (4) | ● Surface Water Take Permit (36) |
| ● Dam Water Permit (13) | ● Earthworks Consent (9) | |
| ● Discharge to Air Permit (7) | ● Effluent Storage Consent (1) | |



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Figure 3: Other Applications Received

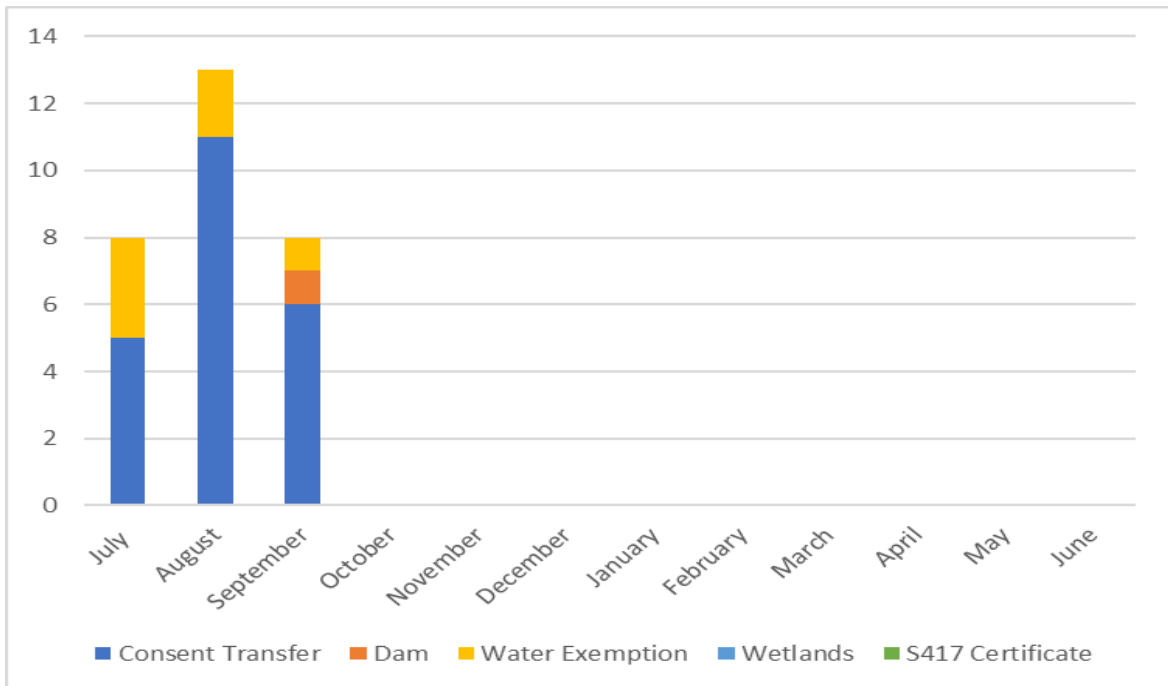


Figure 4: Other Applications Processed

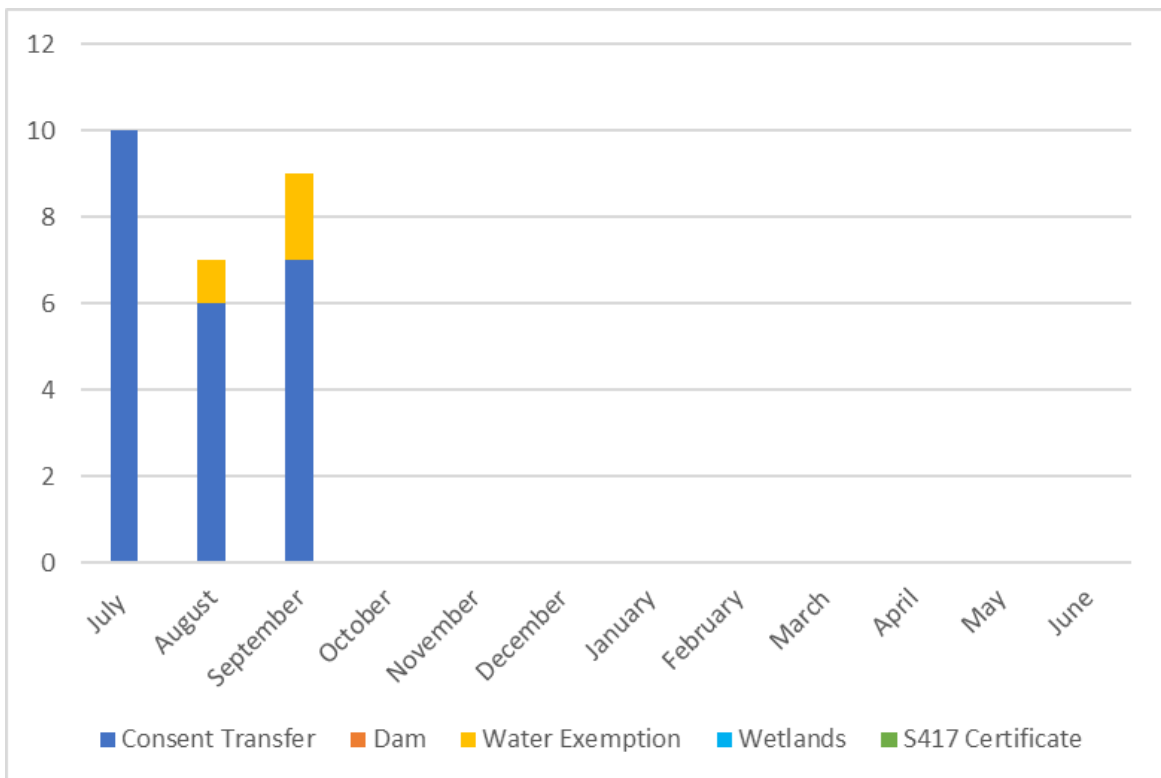


Figure 5 Consent Enquiry Response Times

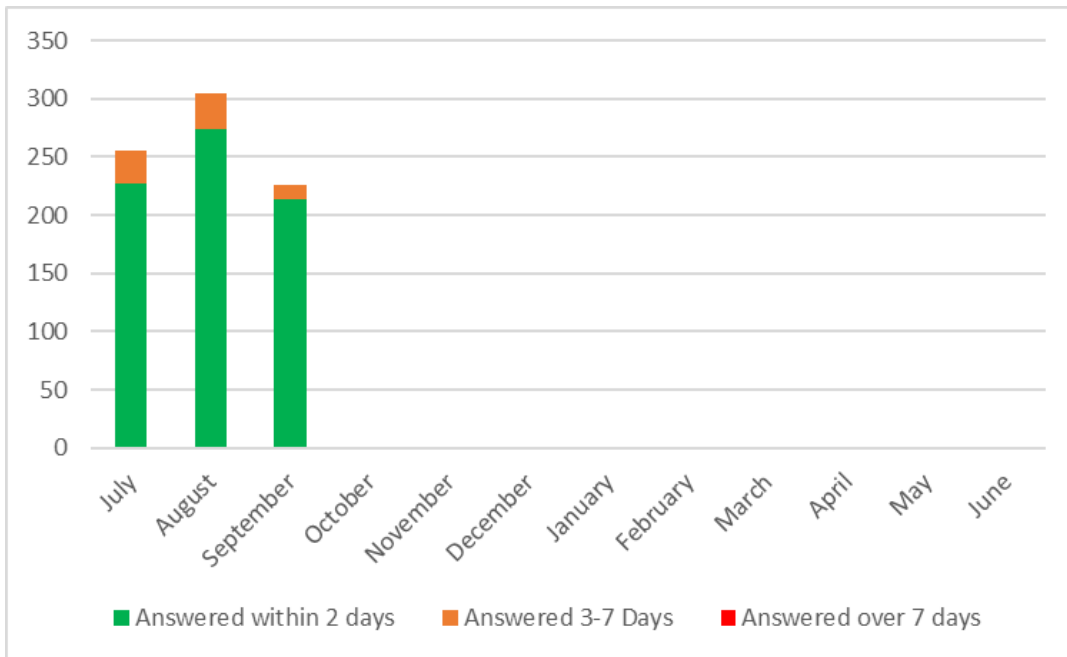
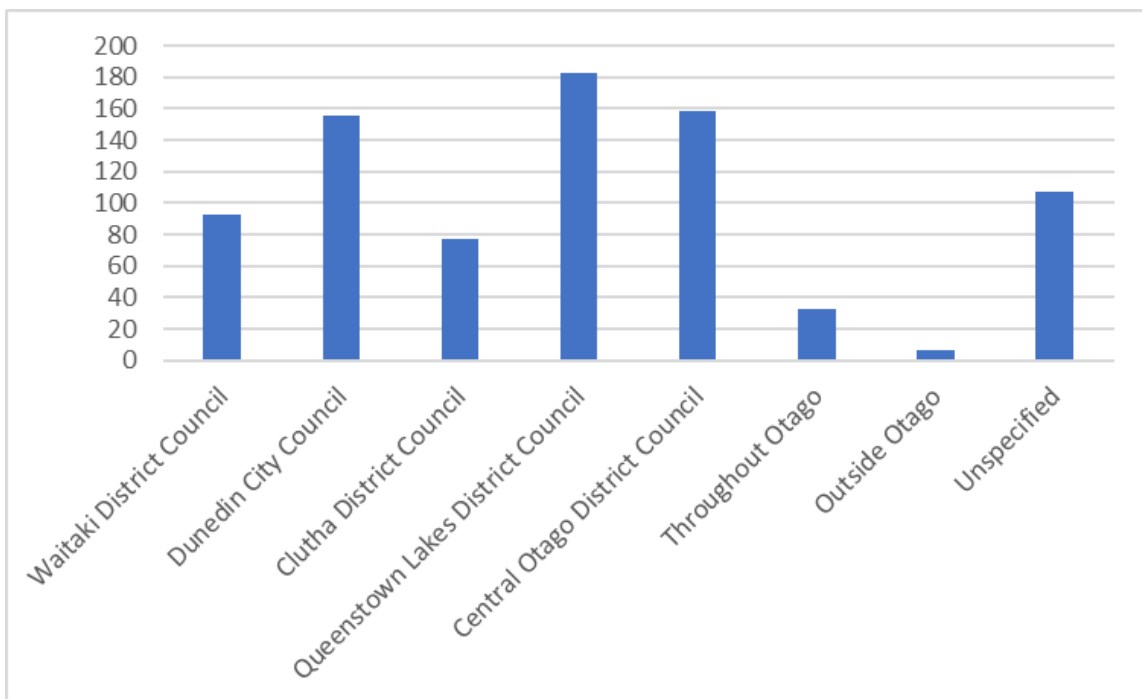
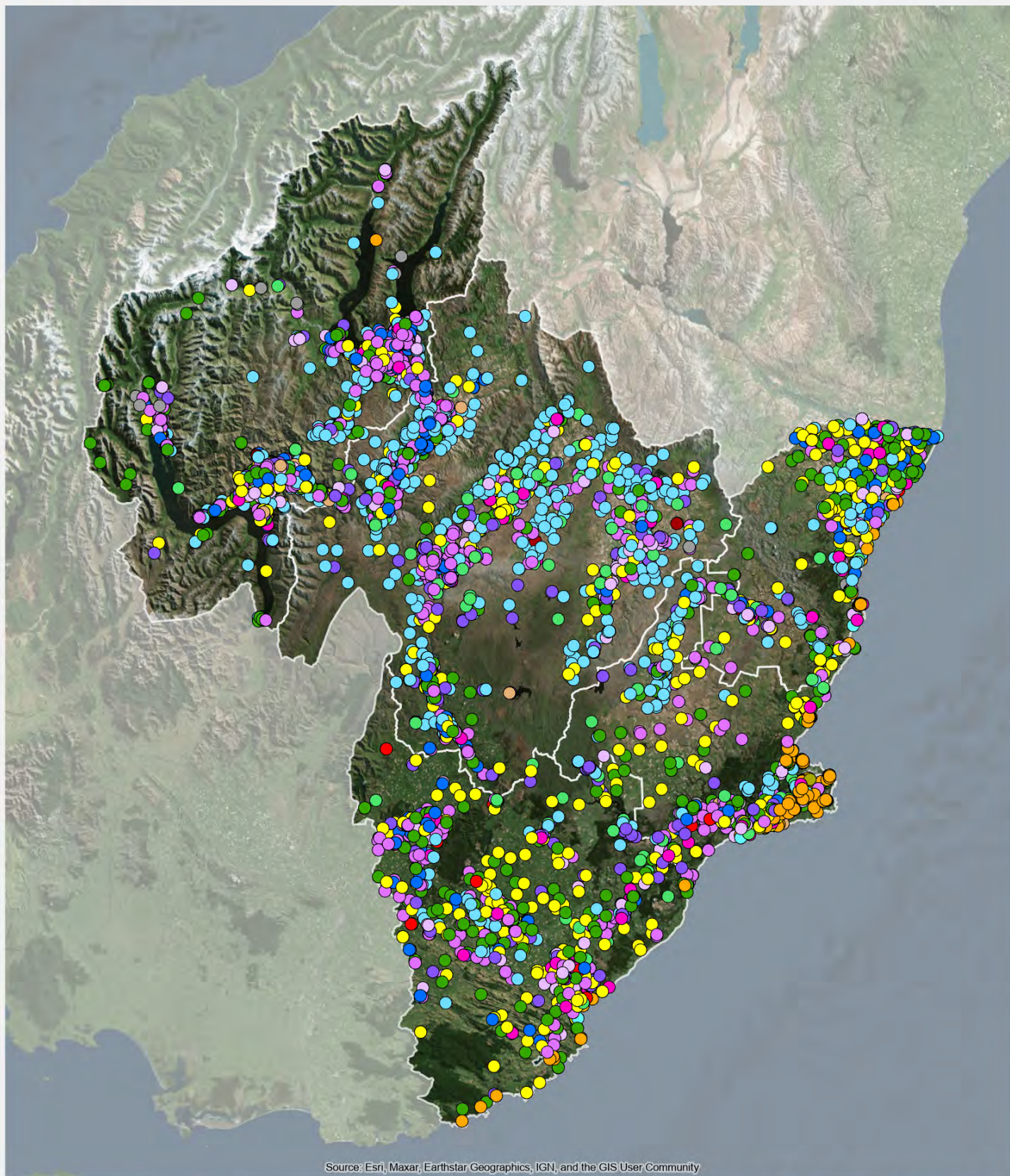


Figure 6: Consent Enquiries by Location



Map 2 – Current Consents

12/10/2023

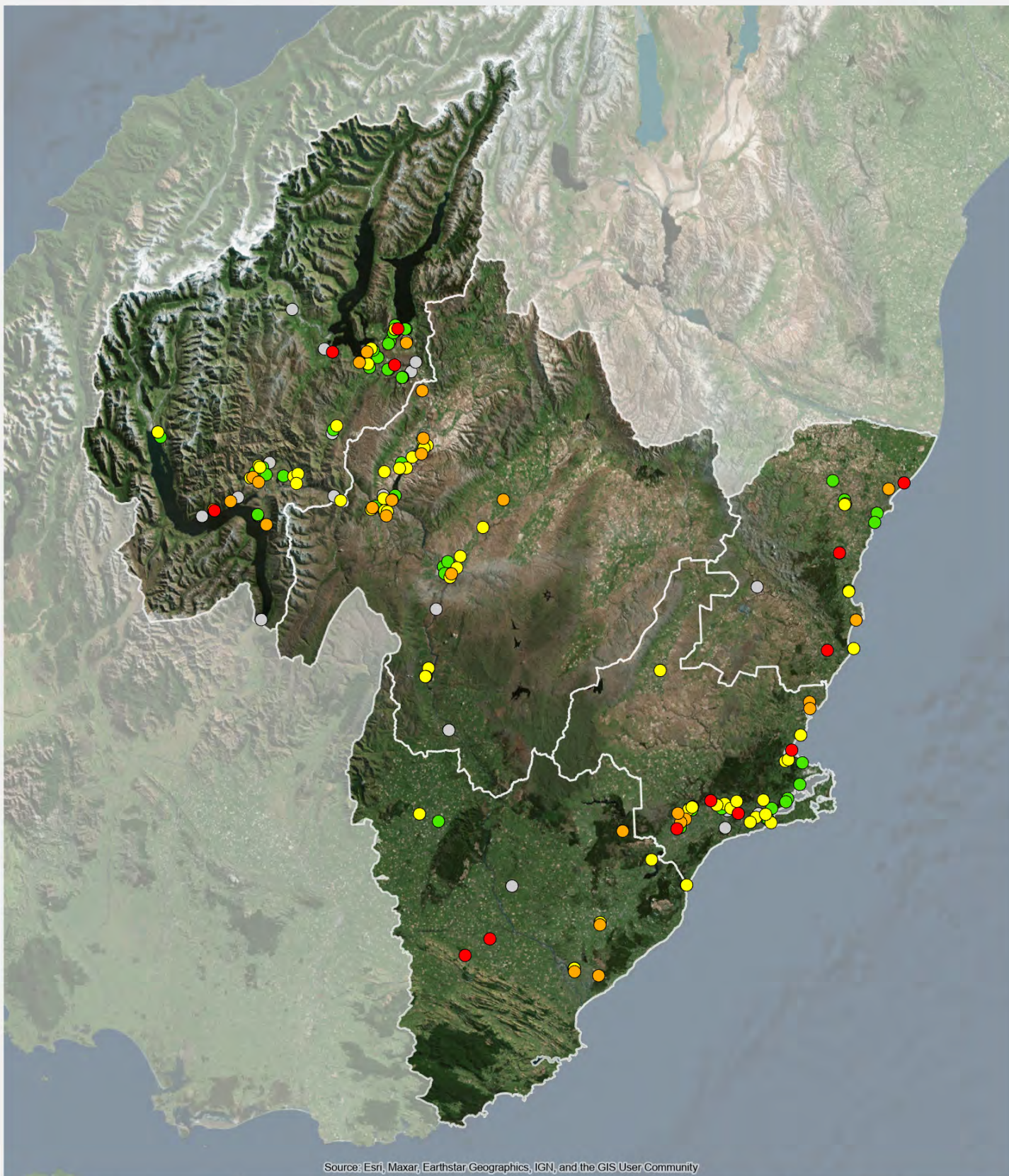


- | | | | |
|--|---|---|--|
| ● Bore Construction Consent (1091) | ● Dam Building Permit (24) | ● Discharge to Water Permit (434) | ● Gravel Extraction Consent (38) |
| ● CMA Use Permit (658) | ● Dam Water Permit (266) | ● Divert Water Permit (253) | ● Groundwater Take Permit (604) |
| ● Coastal Discharge Permit (46) | ● Discharge to Air Permit (218) | ● Earthworks Consent (88) | ● Land Use Consent (919) |
| ● Coastal Water Permit (7) | ● Discharge to Land Permit (936) | ● Effluent Storage Consent (13) | ● Surface Water Take Permit (1000) |

Information on this map may not be used for the purposes of any legal disputes. The user should independently verify the accuracy of any information before taking any action in reliance upon it. This map was generated for A4 printing on 12/10/2023 at the scale of 1:1,400,000.

Map 3 – Consent Audits

From 1st July 2023 to 30th September 2023



Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community

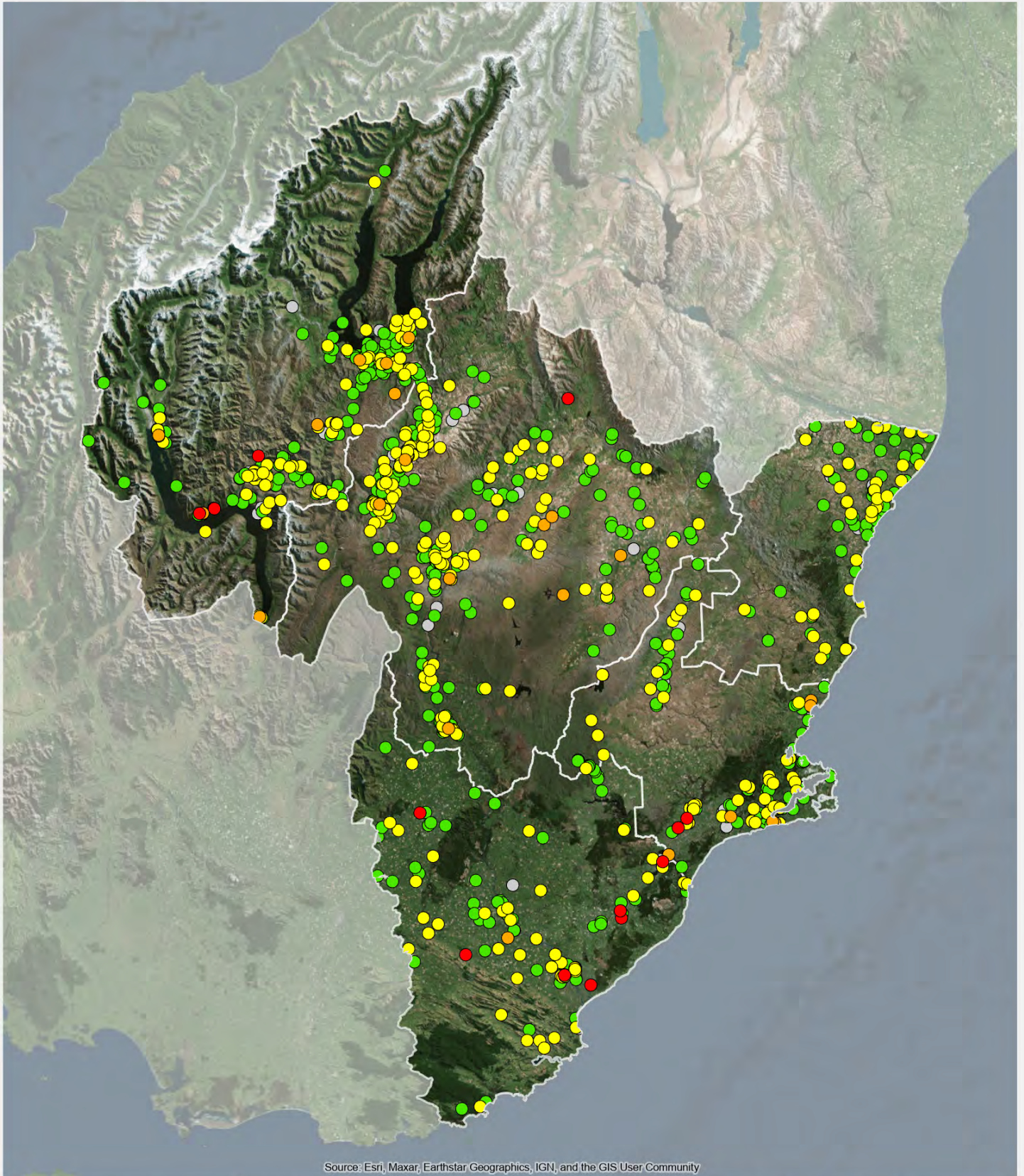
- Consent Not Yet Exercised (28)
- Full Compliance (80)
- Low Risk Non-Compliance (69)
- Moderate Non-Compliance (33)
- Significant Non-Compliance (15)



Information on this map may not be used for the purposes of any legal disputes. The user should independently verify the accuracy of any information before taking any action in reliance upon it. This map was generated for A4 printing on 12/10/2023 at the scale of 1:1,400,000.

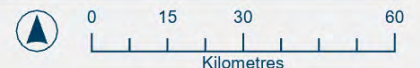
Map 4 – Consent Performance Monitoring

From 1st July 2023 to 30th September 2023



Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community

- Consent Not Yet Exercised (195)
- Full Compliance (1131)
- Low Risk Non-Compliance (504)
- Moderate Non-Compliance (47)
- Significant Non-Compliance (26)



Information on this map may not be used for the purposes of any legal disputes. The user should independently verify the accuracy of any information before taking any action in reliance upon it. This map was generated for A4 printing on 12/10/2023 at the scale of 1:1,400,000.

Figure 7: Performance Monitoring Returns Completed
LTP Performance Measure

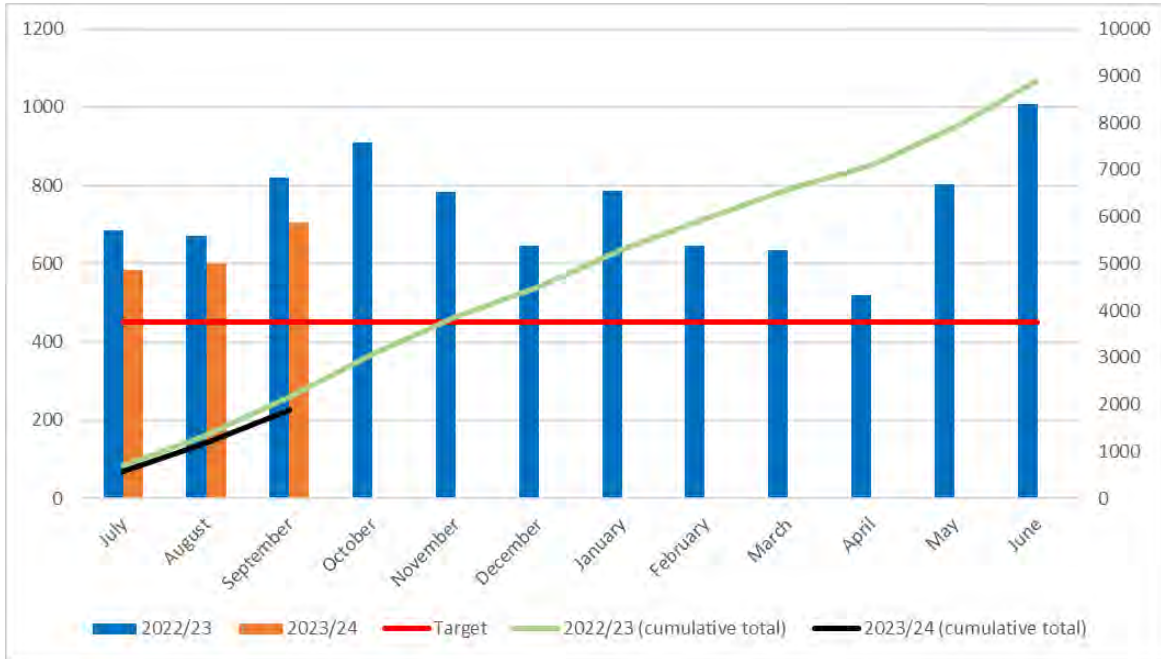


Figure 8: Performance Monitoring Grades Year on Year

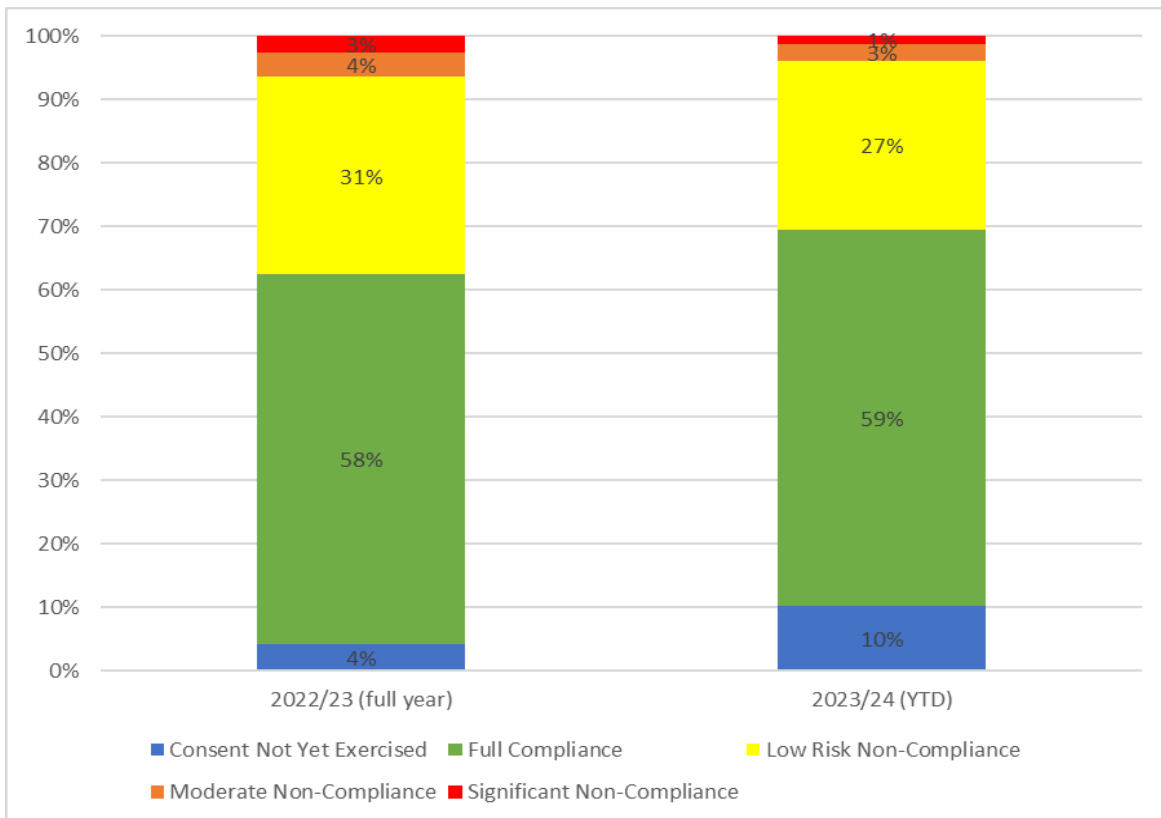


Figure 9: Compliance Audits and Field Inspections Year on Year
LTP Performance Measure

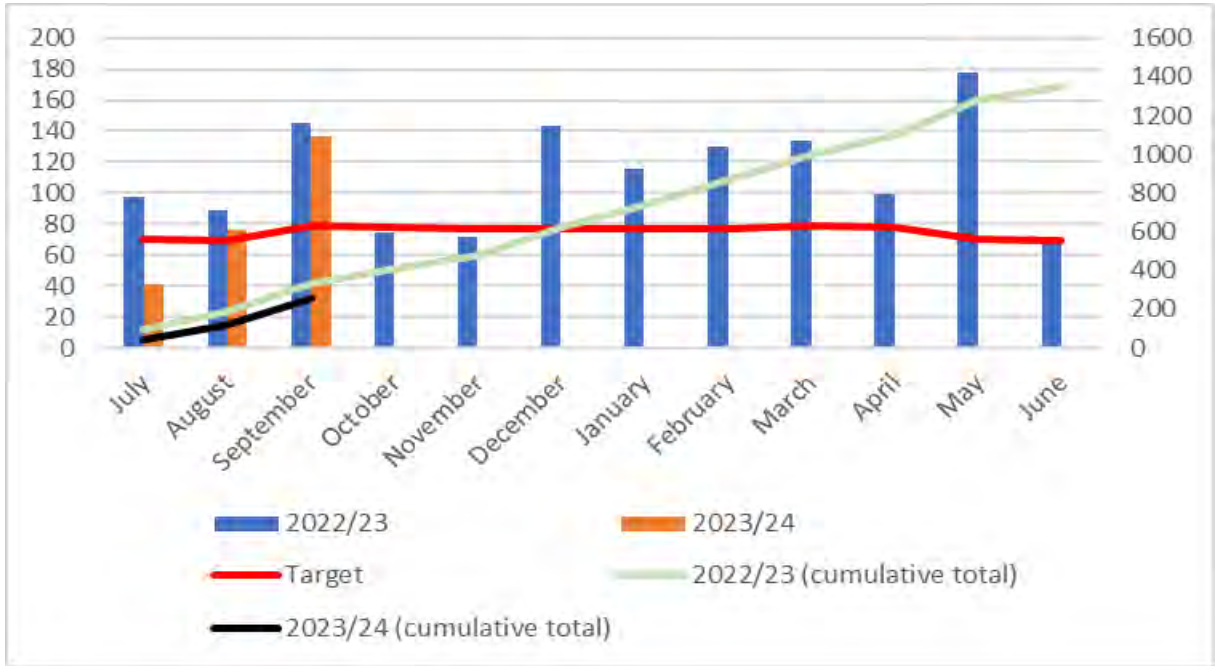


Figure 10: Compliance Audits and Field Visits by Type

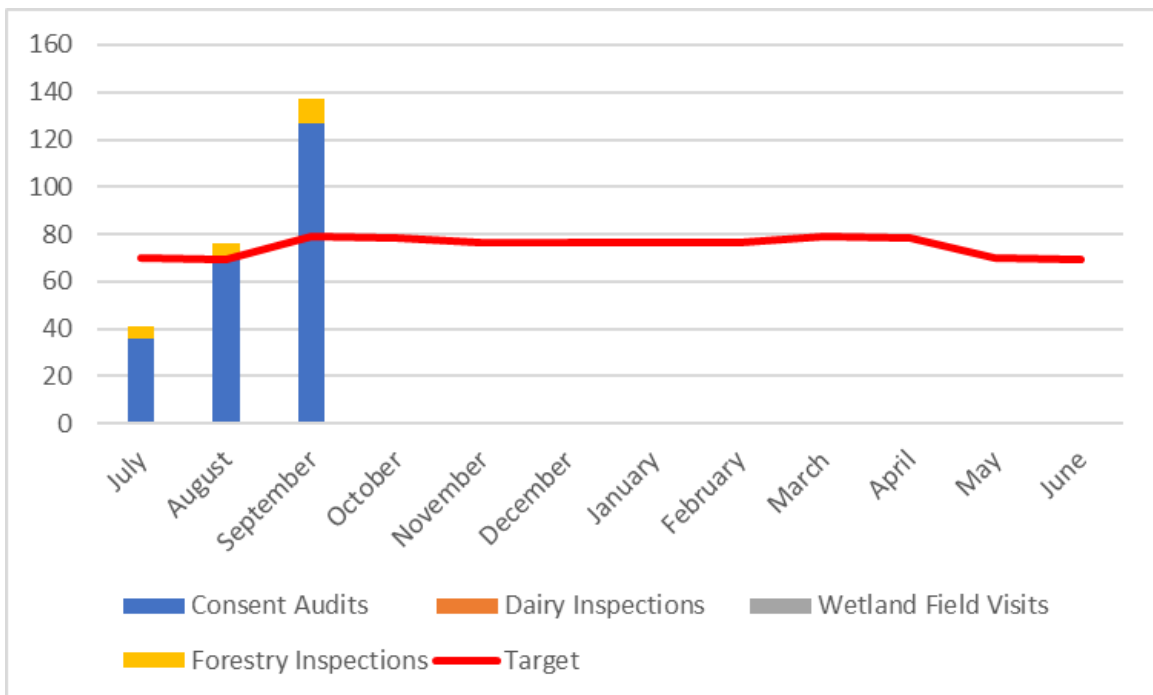


Figure 11: Consent Audit Grades Year on Year

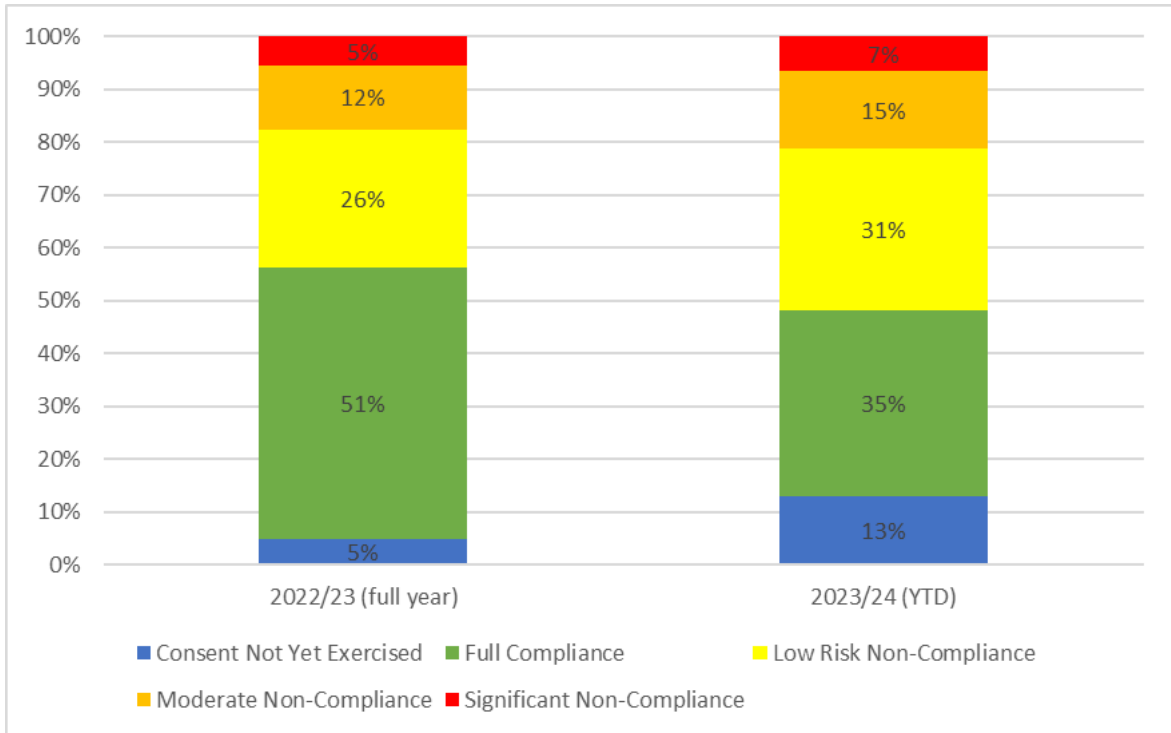


Figure 12: Significant Non-Compliance by Consent Type

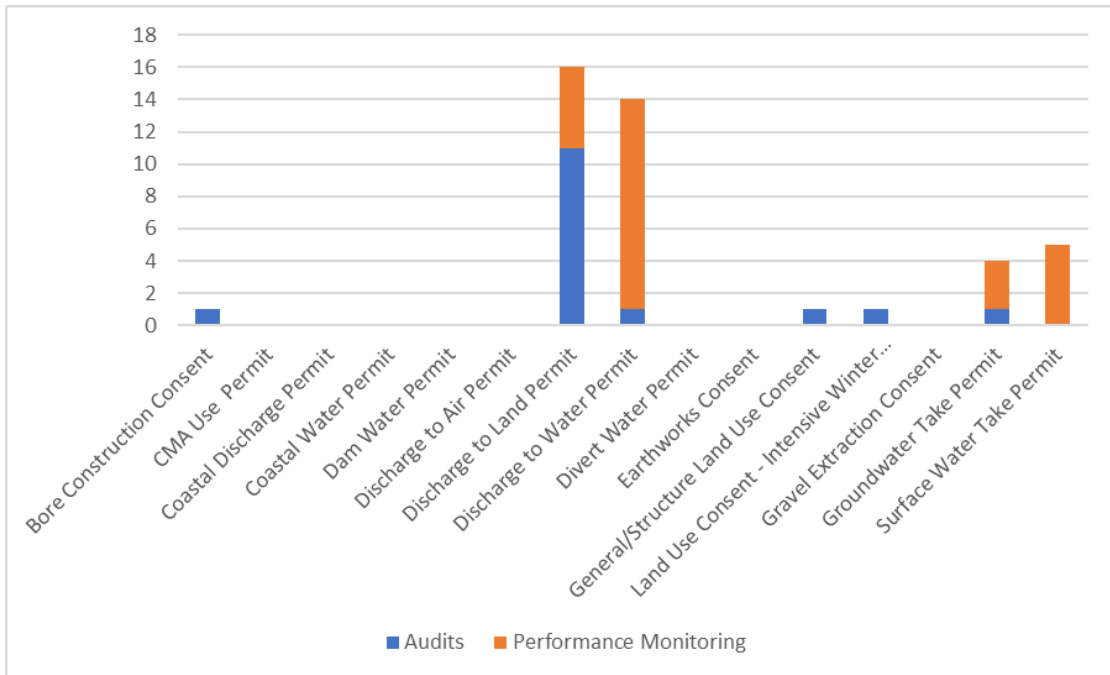


Figure 13: Dairy Inspection Grades Year on Year

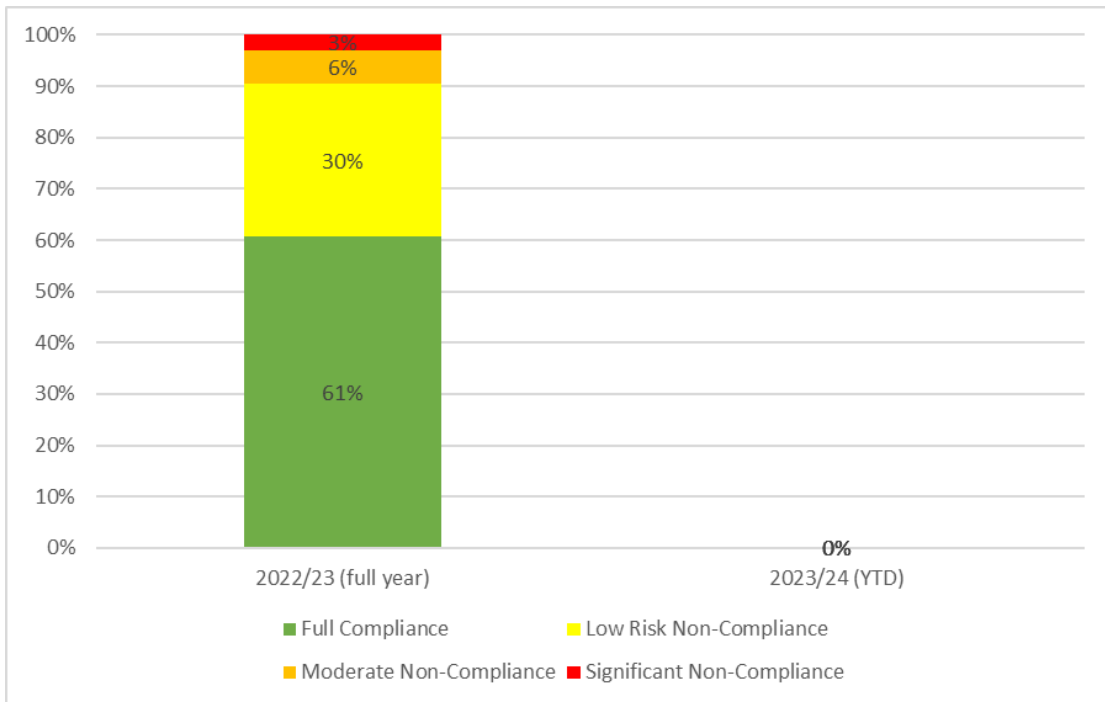


Figure 14: Forestry Notifications and Inspections

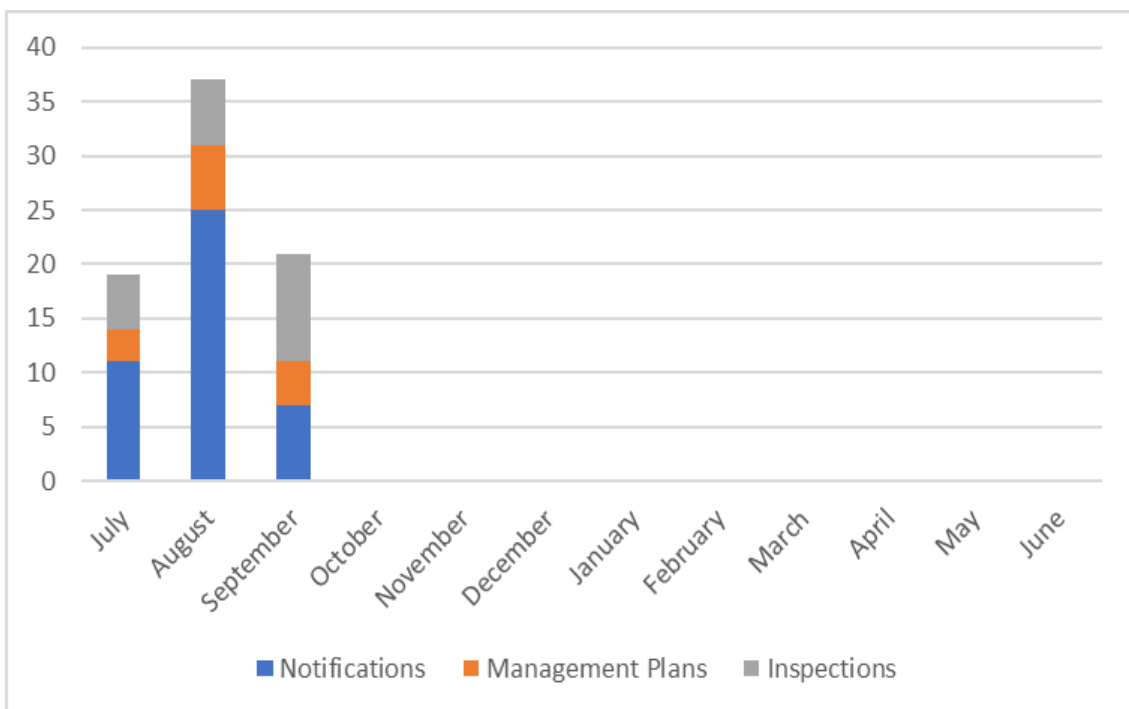
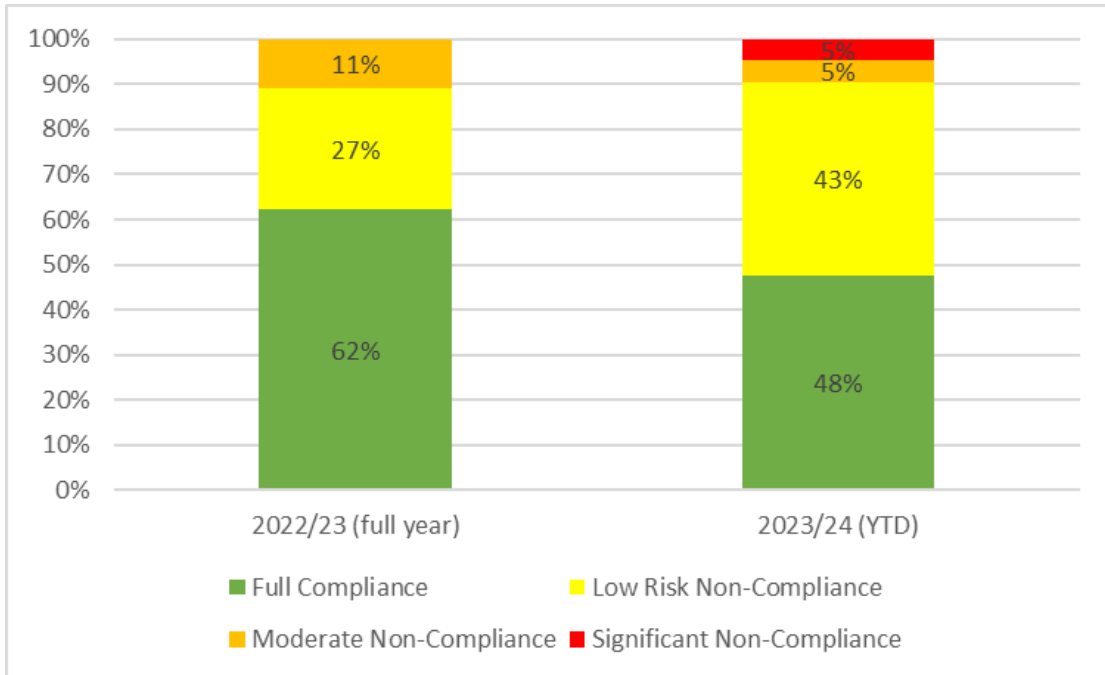
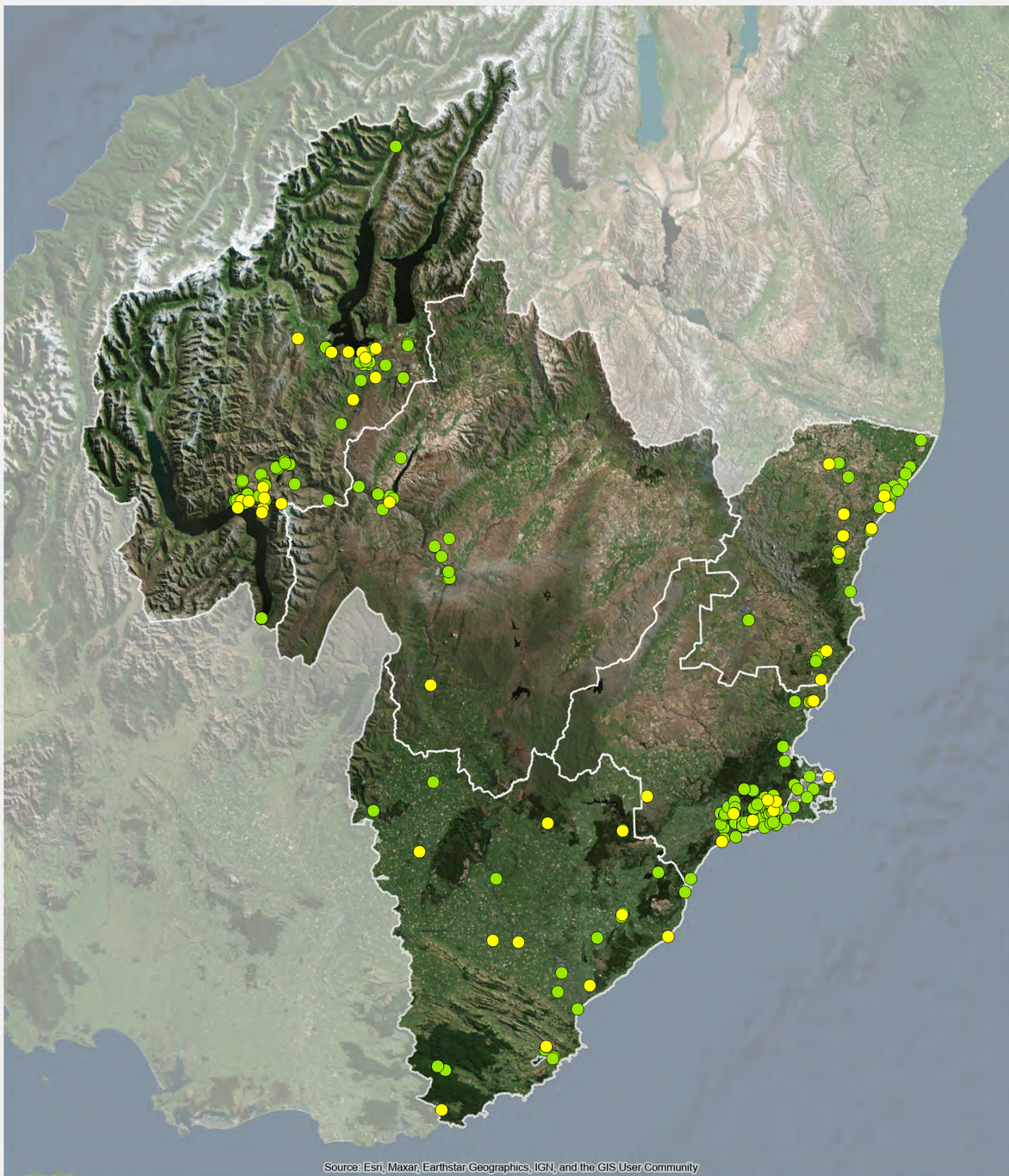


Figure 15: Forestry Inspection Grades Year on Year



Map 5 – Incidents

From 1st July 2023 to 30 September 2023



Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community

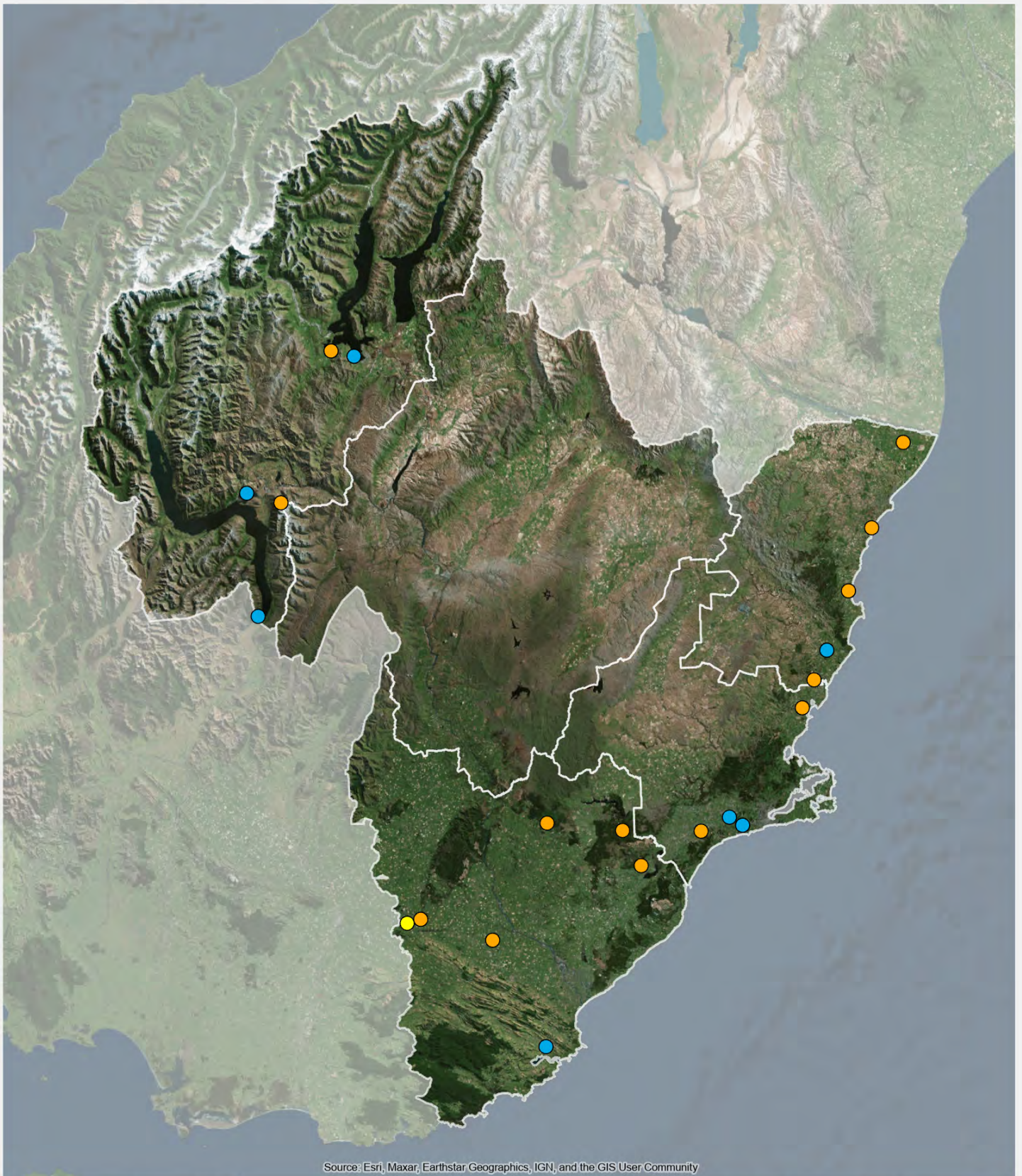
- Completed (289)
- In Progress (56)



Information on this map may not be used for the purposes of any legal disputes. The user should independently verify the accuracy of any information before taking any action in reliance upon it. This map was generated for A4 printing on 24/10/2023 at the scale of 1:1,400,000.

Map 6 – Enforcement Actions

From 1st July 2023 to 30th September 2023



Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community

- Abatement Notice (14)
- Infringement (14)
- Warning (4)



Information on this map may not be used for the purposes of any legal disputes. The user should independently verify the accuracy of any information before taking any action in reliance upon it. This map was generated for A4 printing on 24/10/2023 at the scale of 1:1,400,000.

Figure 16: Pollution Complaints by Type

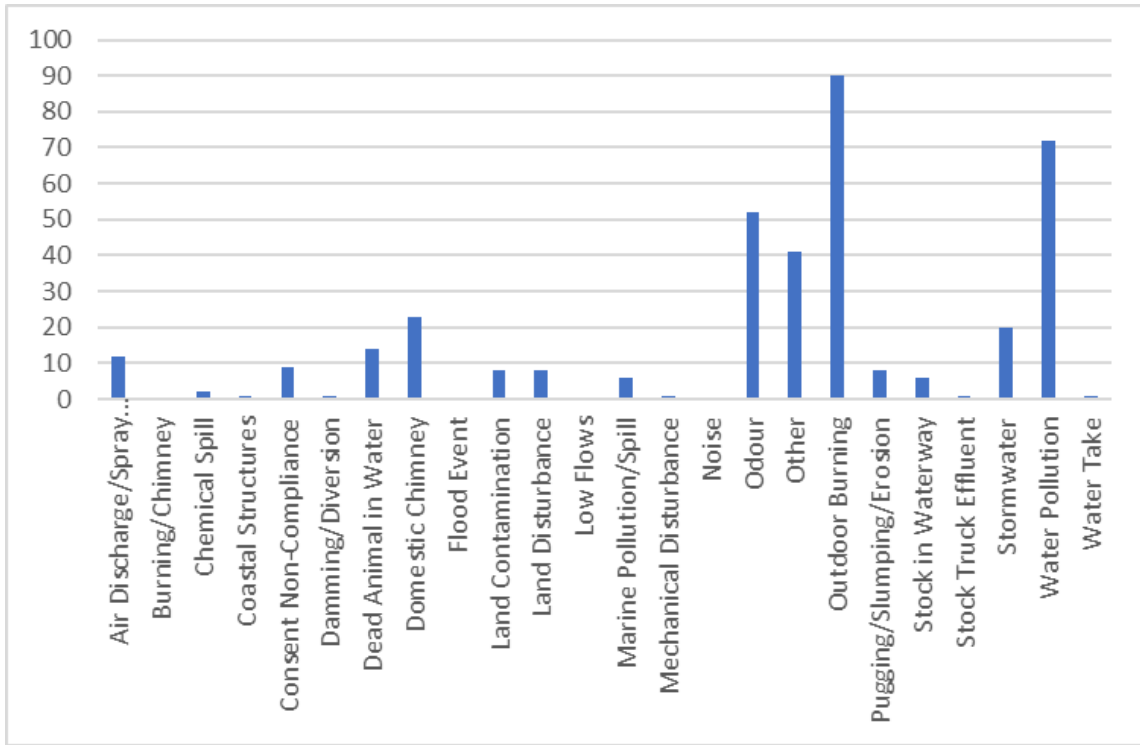


Figure 17: Incident Response Type

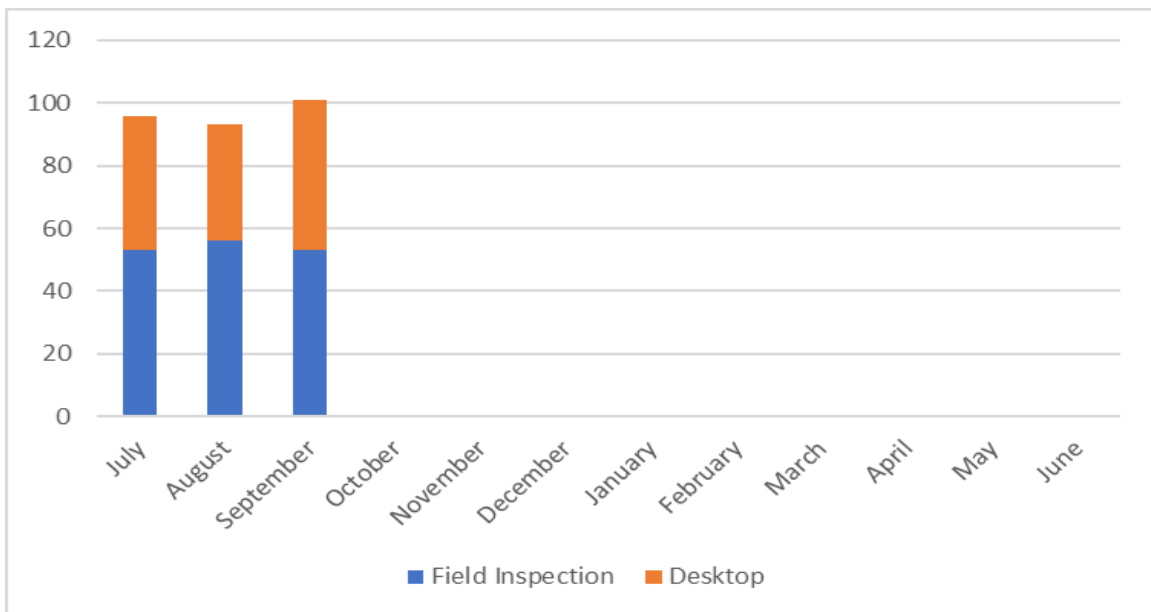
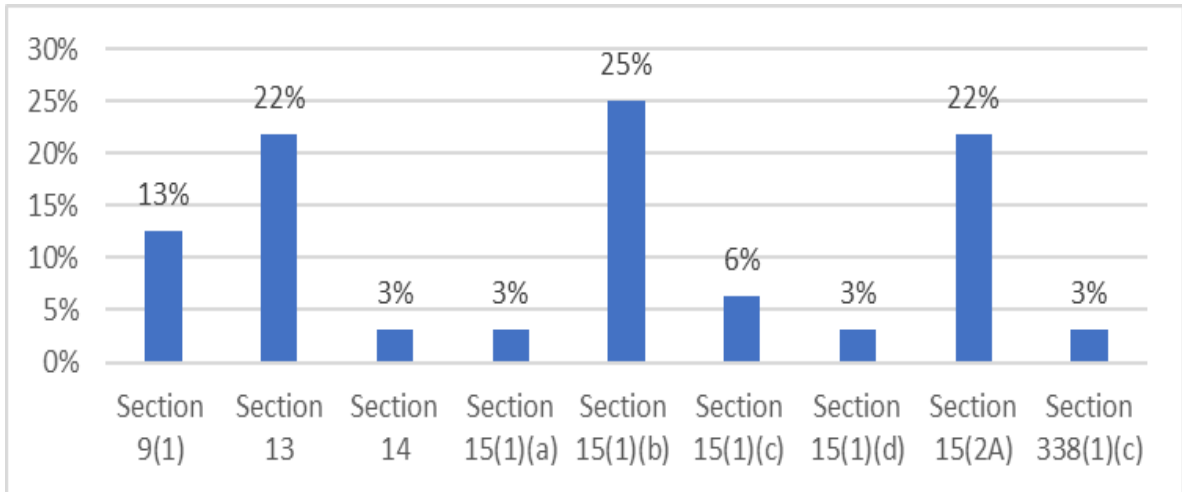
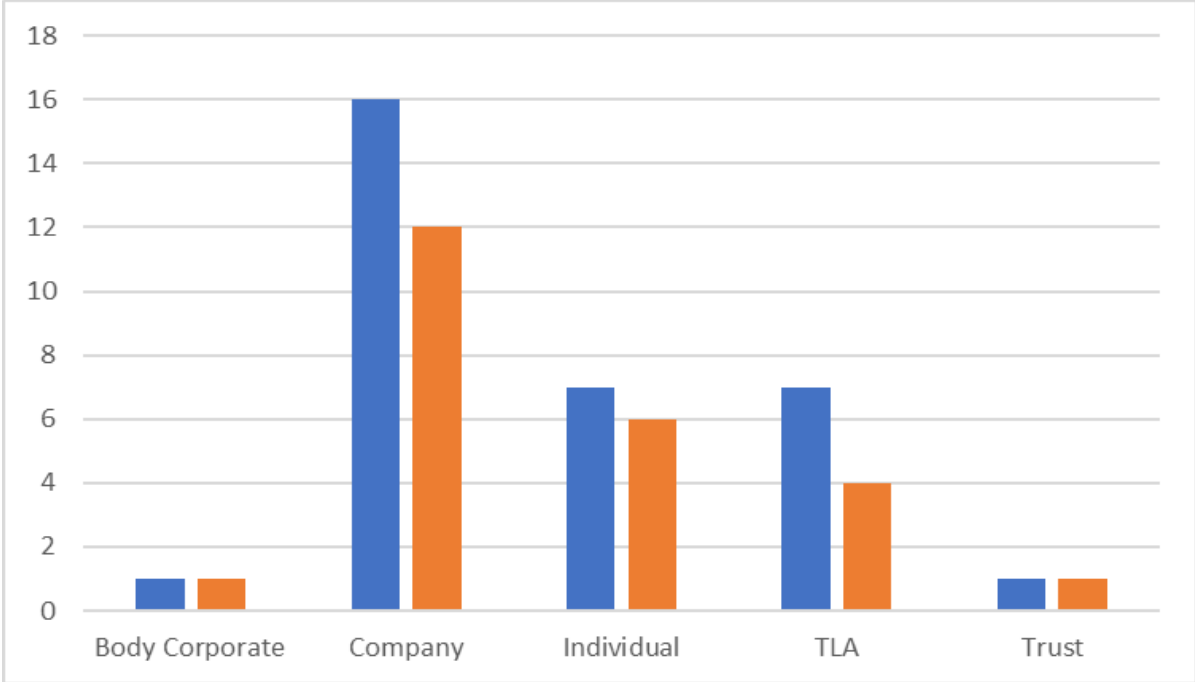


Figure 18: Enforcement Offences



Offence Description	RMA Section
Breach Restrictions On Land Use e.g Disturbance of land/discharge of contaminant to land	9
Breach Restrictions-Lake/River Bed Uses e.g. Disturb riverbed	13
Breach Water Restrictions e.g. Water take breach/Ground water take	14
Discharge Of Contaminants Water e.g. Sediment to water/WWTP discharge breaches	15(1)(a)
Discharge of Contaminants onto-into land that may result in that contaminant entering water	15(1)(b)
Discharge of Contaminates into the environment from industrial and trade premises into air	15(1)(c)
Discharge of Contaminates into the environment from industrial and trade premises onto land	15(1)(d)
Discharge Of Contaminant In On To Air Or Land e.g. Outdoor Burning	15(2) & 2A)
Contravention Of Abatement Notice	338(1)(c)

Figure 20: Enforcement by Offender Type



7.2. Intensive Winter Grazing Summary Report

Prepared for: Regional Leadership Committee

Report No. GOV2338

Activity: Regulatory: Consents and Compliance

Author: Alexandra King, Acting Consents Manager and Tami Sargeant, Manager Compliance

Endorsed by: Joanna Gilroy, Acting GM Regulatory

PURPOSE

- [1] This paper provides a summary of the consent activity for intensive winter grazing (IWG) and Otago Regional Council's (ORC) compliance approach to monitoring IWG practices in Otago for the 2023 winter season.

EXECUTIVE SUMMARY

- [2] The National Environmental Standards for Freshwater (NES-F) sets out requirements for IWG activities. 2023 was the first winter that these regulations applied and if farms could not meet the permitted activity criteria in the regulations, then resource consent was required.
- [3] ORC Compliance and Consents teams have been involved in actively supporting the farming community to achieve compliance, including through issuing consents and undertaking a proactive monitoring programme. This is in line with the approach to all activities the team's handle.

RECOMMENDATION

That the Council:

- 1) **Notes** this report on *Intensive Winter Grazing*.

BACKGROUND

- [4] In 2020, the Government introduced the National Environmental Standards for Freshwater (NES-F), which set requirements for carrying out certain activities which pose risks to freshwater and freshwater ecosystems. One of these activities is intensive winter grazing. The NES-F rules for intensive winter grazing came into force on 1 November 2022.
- [5] There are three pathways for compliance contained within the NES-F regulations:
- a) Permitted activity by meeting the relevant criteria.
 - b) Applying for a consent; or
 - c) Having a certified freshwater farm plan (this option was not available for the 2023 winter season).
- [6] Council undertook a comprehensive implementation program for IWG which involved several teams over the last two years. The work focused on providing Otago specific context to the national regulations for the farming community. This tailored approach included an education-focussed compliance programme the last two years, workshops throughout Otago, creation of consent application forms, template reports and
-

template management plans. This was supported by clear communication on the consents process and requirements for winter grazing.

- [7] Staff worked with the Otago farming community and catchment groups on IWG. This included attending sessions on IWG and providing advice about the rules and the pathways available for IWG activities.
- [8] Staff have also engaged with industry groups, recognising the key role that these groups play in communicating with the farming community. These groups are doing a significant volume of work to support their members. Staff met with, or attended, events at the request of groups including Beef+Lamb NZ, Deer Industry New Zealand, fertiliser and feed reps, Federated Farmers and DairyNZ.
- [9] To ensure that there was internal consistency on IWG and to deliver a co-ordinated programme of work, regular meetings were held with consents, catchment advisors, and compliance team members. This was key to the success of the programme. These meetings were used to discuss any community IWG sessions and to provide advice on interpretation of the rules and consents process.

DISCUSSION

- [10] A total of 297 resource consents for IWG have been issued to date, covering approximately 29,000 hectares for the 2023 winter. Figure 1 in the attachment shows the location of granted IWG consents. As well as the location of the consent being shown in Otago Maps, this was the first year that GIS mapping of the paddocks where wintering would occur was used. This was a success, but the team are looking at ways to ensure that this GIS mapping links to internal databases and covers consents which authorise an activity at more than one site.
- [11] To support farmers to have information about IWG the Consents Enquiries team led and finalised:
 - a) Website updates including a specific farming hub, intensive winter grazing page, FAQs.
 - b) Contributing to the development of regional sector FAQs drafted by Te Uru Kahika.
 - c) Responding to enquires from members of the public and industry; and
 - d) Supporting the Catchment Advisors with information so they can run sessions with rural contractors and professionals.
- [12] Consents staff attended several winter grazing sessions for the public with Council Catchment Advisors and Compliance team members. The focus of these sessions was on how to meet the permitted activity criteria in the NES-FW, grazing management plans, and the consent process. These sessions were well received, and it shows in the number of consents issued.
- [13] Various events including field days, presentations, drop-in sessions, and workshops were undertaken throughout Otago during 2022 and 2023, see Table 1 below.

Table 1: Dates and locations of events during 2022 – 2023

Date	Location
May 2022	North Otago
	South Otago
June 2022	Ranfurly
	Clinton
	Tapanui
	West Otago
	East Otago
July 2022	Omakau
August 2022	Cardrona
	Teviot
September 2022	Millers Flat
	Oamaru
October 2022	Ida Valley
	North Otago
November 2022	Omakau
	North Otago
	Tapanui
	Clydevale
	Clinton
December 2022	Tapanui
February 2023	Palmerston
	Waikouaiti
March 2023	Moeraki
	Ranfurly
	Middlemarch
	Hawea
	Papakaio
	Five forks
April 2023	Owaka
	Milton
	Lawrence
May 2023	Dunedin
	Balclutha
	Oamaru
	Alexandra
September 2023	Cromwell
	Oamaru
October 2023	Mosgiel
	Taiari
	Kurow
November 2023	Ida Valley

Intensive winter grazing compliance programme

- [14] Monitoring compliance with IWG regulations and the NES-F falls within priority one of the ORC Compliance Plan 2023-2026 to “reduce non-compliant discharges to improve freshwater quality”.
- [15] The compliance monitoring focus for winter grazing in 2023 was on farms where IWG consents had not been applied for, and waterway disturbances. Whilst this was the first winter that consents were monitored, the general approach to how compliance was monitored was the same as previous years: education and engagement with farmers and primary industry sector; flyovers; follow ups where necessary including phone calls, letters, and site visits; and responding to incidents.
- [16] Region-wide flyovers were undertaken in April and July 2023. These flights are a routine part of the compliance programme and are an excellent tool. Compliance after both flights was considered good with appropriate measures in place. Staff anecdotally observed improvement in recent years, with a lot of buffer zones and non-sown areas visible.
- [17] After the flyovers, staff followed up ‘on the ground’ with a total of 26 site visits where potential breaches or high-risk sites were identified. These were followed up due to concerns over the management of critical source areas, slope of land and proximity of grazing crops to waterways. These follow-ups provided an opportunity to ‘ground truth’ what was observed from the air. Most of the site visits showed that there was not a breach, or that the breach was low risk non-compliance. The ground truthing also allowed for educational support for the farms involved and to provide information on the consenting process.
- [18] During the 2023 Season, ORC issued one abatement notice and one infringement notice in relation to stock grazing within a critical source area causing sediment to mobilise from one paddock. Compliance was met with the abatement notice with corrective actions taken by the farmer.
- [19] In addition to the ‘on the ground’ follow-ups for the 26 sites, phone calls and letters highlighting that observed practices may not comply under the NES-F rules were sent to farms after the second flyover. Feedback was received from a small number of farmers who did have consents in place for IWG activities. Issues with this process are acknowledged and an apology was provided to parties at the time. Process improvements that will be in place for winter 2024 include:
- a) Reviewing mapping process for IWG consents, so that lease blocks are more accurately reflected in the system.
 - b) Ensuring the GIS system links to our database. This will be an additional manual check for winter 2024, but will be easier once our new system is in place from 2025.
 - c) Additional checks to confirm lot and parcel numbers provided, so that these are able to be pulled through our internal systems.
 - d) Where there is a number of letters to be sent, there will be an accompanying media release.
 - e) Use of phone calls before letters are sent.

- f) Wording changes in the letters to enhance the customer focus of them, but still making sure that the message about the importance of compliance is maintained.
- g) Additional checks to confirm that information in the database, GIS maps, aerial maps and flyover data align. This currently happens, but an additional layer of cross referencing will occur.
- [20] Sending letters after an aerial flyover is a routine part of the compliance programme and these have been sent in the last two years. They will remain as part of the approach to communications in winter 2024, but with the above changes made.
- [21] A small number of complaints received in relation to IWG practices were received via the Pollution Hotline which were followed up by staff to assess compliance.
- [22] ORC has developed an interactive GIS map which identifies IWG consents and polygons with the consented area for IWG, overlays of information from Manaaki Whenua maps of IWG crops from the 2022 season, and any proactive or reactive compliance inspection and site visits. This mapping tool supported efficient use of resources and monitoring of IWG activities in the 2023 Season.
- [23] Regular meetings were held with ORC, Environment Southland Compliance Teams and the MPI animal welfare team to support consistent and best practice compliance approaches within the regions. MPI and Environment Southland compliance staff also observed an improvement in grazing practises from last year. Regular meetings were also held with Primary Industry Groups which are a positive forum for discussing key compliance messages.

Next steps

- [24] Staff have completed an internal debrief of what worked and did not work for IWG in 2023 and will take key lessons through into winter 2024 to enhance the great work that has been completed to date. Staff are pleased with the level of engagement that there has been from farmers, industry groups, stakeholders and partners and will look to support this level of engagement moving forward into next winter.
- [25] Implementation will continue into 2024 with workshops being organised for February - March throughout Otago. At these workshops, Council will provide guidance on management plans, advice on consenting, and best practice. This work will flow into the Environmental Implementation team with support from the Consents public enquires staff. This will allow the consents team to focus on cost recoverable work.
- [26] The compliance focus for the 2024 season will be on farms that do not meet permitted conditions and do not have a consent. The roll-out of the Freshwater Farm Plans in North Otago from February 2024 may provide a potential pathway for farms in the North Otago FMU. The compliance approach and actions will be in line with ORC RMA Compliance and Enforcement Policy.

OPTIONS

- [27] As this is a report for noting there are no options.

CONSIDERATIONS

Strategic Framework and Policy Considerations

[28] The IWG consenting and compliance programme are consistent with the ORC Strategic framework. This includes supporting our vision for Otago including:

- a) An environment that supports healthy people and ecosystems.
- b) A sustainable way of life for everyone in Otago; and
- c) Te Ao Māori and Mātauranga Kāi Tahu are embedded in Otago communities.

[29] The programme also delivers on several commitments made in the strategic directions including:

- a) Effectively engaging communities.
- b) Collaborating to deliver.
- c) Mātauranga Kāi Tahu is an integral part of our decision-making.
- d) Focus on Community Needs.

Financial Considerations

[30] This work programme is included within existing budgets. Consent fees are recovered in accordance with existing policy.

Significance and Engagement

[31] As this is a report for noting consideration of the Significance and Engagement Policy is not required.

Legislative and Risk Considerations

[32] There is a risk to ORC's reputation if the community and stakeholders do not feel supported through this process.

[33] There is a legal and reputational risk if Council does not implement or give effect to the NES-F and associated delivery of ORC's regulatory functions.

Climate Change Considerations

[34] There are no climate change considerations associated with this report.

Communications Considerations

[35] Communication with the Otago community occurs on a regular basis to educate and inform people on regulatory matters. Compliance and Consents teams continue to work with the Communications team to ensure that messaging about the permitted criteria and consent pathway is provided to the community.

NEXT STEPS

[36] Staff will continue with the IWG consenting and compliance programmes that are already underway. We will continue to work closely with the wider regional sector, industry groups, key stakeholder groups and the Ministry for Environment to support the implementation of rules for IWG activities.

ATTACHMENTS

1. Attachment One Map showing IWG consents throughout Otago [7.2.1 - 1 page]

Figure 1: Map showing IWG consents throughout Otago



7.3. Farm Plan Implementation Update

Prepared for:	Regional Leadership Committee
Report No.	REG2309
Activity:	Regulatory: Policy Development
Author:	Libby Caldwell, Manager Environmental Implementation
Endorsed by:	Joanna Gilroy Acting General Manager Regulatory
Date:	8 th November 2023

PURPOSE

- [1] To provide an update on implementation activities related to the Freshwater Farm Plan (FWFP) rollout in Otago.

EXECUTIVE SUMMARY

- [2] Freshwater Farm Plans (FWFPs) have been introduced nationally through the Freshwater Package. They will roll out in Otago from 2024. FWFPs will encourage on farm actions to support freshwater outcomes.
- [3] For Otago, the regulations go live on the 1st February 2024 in North Otago. Following this every 6 month until December 2025 other areas of the region's regulations are 'turned on'. As of December 2025, the whole region will be live.
- [4] It is recognised that for successful rollout of FWFPs within Otago, ORC's relationships with industry, mana whenua, catchment groups and our farmer/grower community are essential. Staff have had regular communication and meetings with key stakeholders to ensure that there is a collaborative approach to implementation to ensure that farmers and growers are supported on the FWFP journey. This is an ongoing process and communications and engagement will ramp up over time.
- [5] Implementation work is underway includes ongoing stakeholder engagement, commencing the development of the North Otago CCCV, ongoing engagement with mana whenua to incorporate what is needed into the FWFP system, consideration of regional training needs and communication with suppliers and communications via multiple methods.

RECOMMENDATION

That the Regional Leadership Committee:

- 1) **Notes this report.**

BACKGROUND

- [6] Freshwater Farm Plans (FWFPs) were introduced through the Freshwater Package and will roll out in Otago from 2024. FWFPs will encourage and support on farm actions to support freshwater outcomes.
- [7] The regulations have been released which detail what Councils are required to provide to support FWFPs, as well as what farmers will need to include and complete to ensure they meet the regulations.
- [8] For Otago, the regulations go live on the 1st February 2024 in North Otago. Following this every 6 month until December 2025 other areas of the region's regulations are 'turned on'. As of December 2025, the whole region will be live. After an area of Otago has had the regulations 'turned on', a farmer/grower will have 18 months to have their FWFP certified.
- [9] Under the regulations FWFPs will be needed for properties if they trigger the land use thresholds. These triggers are shown below:
- a) 20 or more hectares of the farm is arable land use; or
 - b) more hectares of the farm is horticultural land use; or
 - c) 20 or more hectares of the farm is pastoral land use; or
 - d) a prescribed area of the farm is other agricultural land use prescribed in regulations made under section 217M(1)(b); or
 - e) 20 or more hectares of the farm is a combination of any 2 or more of the land uses described above.
- [10] The implementation plan for Freshwater Farm Plans (FWFPs) has been endorsed by Council and is being implemented (see attachment 1).

DISCUSSION

Implementation activities

- [11] Below is a discussion of the implementation activities that staff have completed since the last paper, based on our key workstreams. This represents in a significant volume of work in a short period of time. There are also a number of activities underway or planned. Implementation work is on track as based on our implementation plan and is an ongoing and iterative process.

Stakeholder engagement

- [12] It is important that farmers and growers in Otago feel supported through this new process and there is positive engagement through attendance at workshops or other methods of communicating with the ultimate goal of supporting water quality enhancement across the region.
- [13] Staff have had regular communication and meetings with key stakeholders to ensure that there is a collaborative approach to implementation to ensure that farmers and growers are supported on the FWFP journey. It is recognised that for successful rollout of FWFPs within Otago ORC's relationships with industry, mana whenua, catchment groups and our farmer/grower community are essential. It is important that farmers and growers in Otago feel supported through this new process and there is positive

engagement through attendance at workshops or other methods of communicating with the ultimate goal of supporting water quality enhancement across the region.

[14] Since the last update to the Regional Leadership committee in August many engagements have occurred and include:

- a. Regionals stakeholders have been identified and mapped to determine what level of engagement these will require.
- b. Email correspondence has occurred with all stakeholders with the intention of the next communication to be via a newsletter that they can sign up for and will be sent out on a monthly basis to begin with. The first issue of this newsletter will go out in November.
- c. Meetings and regular correspondence with North Otago FMU catchment groups and irrigation companies has occurred.
- d. Community meetings held in North and East Otago. By the end of November seven (three in North Otago and four in East Otago) community sessions will have been held across this area so that farmers can find out more about FWFPs and ask questions of staff. These sessions have been organised by NOSLaM and East Otago Catchment Group and are also supported by the Ministry of Primary Industries on Farm Support Team.
- e. Letters have been sent to all landowners in North Otago who may be likely to require a FWFP as of the 1st February 2024. This letter also provided information on the community meetings and resource available to them.
- f. Staff attended and presented to the Otago Extension Network on Freshwater Farm Plans and the Otago South River Care AGM.
- g. Environment Southland staff have visited ORC and discussed their implementation plan and their rollout of FWFPs.
- h. Staff have visited Waikato Regional Council to hear about their programme rollout, gained ideas and checked for consistency.
- i. Staff continue to regularly attend the sector wide meetings set up by Te Uru Kahika where updates are provided on FWFPs and the Director Freshwater Farm Plans from Te Uru Kahika has visited staff at Otago Regional Council.
- j. Staff are engaging with the land managers group (sector) to ensure that there is national consistency. ORC are also supporting the sector where we can by providing advice and information, we have created to support the councils who go live in phase 3.
- k. Two workshops have been held with MPI and MFE to understand and align stakeholder engagement efforts.
- l. Work directly with catchment groups and Otago Catchment Communities continues.
- m. We are working on a checklist that farmers and growers can use to see if once they have a farm plan partly completed that they are ready for certification. This is to support farmers and growers who may want to do their plans themselves.

[15] A monthly newsletter is in development where stakeholders and farmers will be able to sign up for the newsletter being sent to them to provide a regular update on the implementation of FWFPs across Otago.

North Otago Catchment Context Challenges and Values (CCCV)

- [16] Work has commenced to develop the North Otago CCCV which is a requirement for Council under the regulations. The regulations state that a CCCV should include the following in relation to a local area:
- a. existing information on landforms, soil data, climate data, freshwater data, freshwater bodies, contaminants, sites that are significant to the community, and significant species or ecosystems;
 - b. identified cultural matters of importance to tangata whenua including the cultural significance of the local area, the traditional names of freshwater bodies in the local area and sites and species in the local area that are significant to tangata whenua;
 - c. any objectives, policies, and rules relevant to the management of freshwater or freshwater ecosystems in policy statements or the regional plan;
 - d. any relevant freshwater matters in planning documents that are recognised by iwi authorities and lodged with the regional council;
 - e. the National Policy Statement for Freshwater Management and any action plans made by the regional council; and
 - f. any secondary legislation made under the Act that is relevant to the management of freshwater or freshwater ecosystems.
- [17] The CCCV is due to be completed in mid-December. Following completion of the North Otago CCCV the Lower Clutha CCCV development will commence.

Mana whenua

- [18] Under the National Policy Statement for Freshwater Management (NPS-FM) Councils must involve mana whenua, as well as others in the regional freshwater planning process. Engagement with mana whenua on development of the FWFP process has commenced and is ongoing through Aukaha and Te Ao Marama. Rūnaka have provided input to help determine the proposed rollout sequence for Otago and are supportive of the proposed rollout.
- [19] The Regulations include specific requirement for mana whenua involvement. This is specifically noted in the below sections of the regulations:
- a. Clause 46, where Council must collate information on CCCV including values and matters of importance to mana whenua.
 - b. Schedule 2 requires that certifiers and auditors must be able to demonstrate an understanding of the Treaty of Waitangi (te Tiriti o Waitangi), te ao Māori, Te Mana o Te Wai and sites or species of cultural significance as defined by mana whenua. This information will be included in the regional training for auditors and certifiers and will be developed by mana whenua.
 - c. Clause 5 in Schedule 2 requires Council to engage with mana whenua in the preparation and delivery of training for certifiers on catchment context, and on the competencies for certifiers. Council must also engage with mana whenua regarding practical assessments of certifiers if practical assessments are required as part of the certifier appointment process.
 - d. Clause 12 in Schedule 2 has the above requirement regarding auditor training.

- [20] Staff have worked in partnership with Aukaha and Te Ao Marama to ensure that mana whenua are included in the aspects of the FWFP system that they would like to be involved in or have oversight of. This will continue throughout this programme.
- [21] Aukaha is engaging with Rūnaka within the North Otago area to determine what will need to be included in the CCCV and what involvement and content they would like as part of the regional training.

Certifiers and Auditors

- [22] Following the development of the CCCV, regional training for Otago needs to be created and provided so that we have certifiers able to certify FWFPs in Otago. A supplier will need to be engaged to support development of these learning modules that are specific to our region. The training is likely to include a series of online modules and a one day in person day. Likely modules will include intensive winter grazing, effluent management, regional rules and Otago specific cultural matters.
- [23]ASUREQuality have been engaged at the national level by MfE to deliver the national training programme. The regional training programme will ensure that potential suppliers understand the unique challenges that Otago farmers and growers face and what our regional plan requires.
- [24] An expression of interest form has been produced to be included on the ORC website to further understand who is interested in becoming a certifier and/or auditor and how many people are interested in this role.

Integrated National Farm Data Platform (INFDP) Bridge

- [25] The INFDP Bridge has launched at the national level. The INFDP is a regulatory farm data storage system for New Zealand and the full system will be available from early 2025. In the absence of this the Bridge will be in place to fulfil the immediate needs posed by FWFP regulations and this will require manual data entry by users. The INFDP will have greater functionality including industry Application Programming Interface (API) integration opportunities and efficiencies for regional and unitary councils.

Communications

- [26] The ORC website has been updated with content with a dedicated space for FWFPs. A Frequently Asked Questions (FAQ) section has been added to this web page to provide answers to questions for stakeholders, farmers and growers and for those who are interested in becoming certifiers or auditors. This page will continue to be updated.
- [27] Advertising for the North Otago community meetings has occurred with a flyer being created for letter box drops in East Otago and letters sent to all landowners in the North Otago FMU likely to trigger the need for a FWFP.
- [28] Media releases have been issued, with the focus on raising general awareness about farm plans. These will continue over the coming months.

Te Uru Kahika documents

[29] Te Uru Kahika have produced guidance materials for Regional Councils to use and support FWFP implementation. This includes:

- a. Scale and Extent guidance
- b. Identifying the Farm Operator guidance
- c. System guidance
- d. Cross-regional boundaries guidance
- e. CCCV guidance

[30] Te Uru Kahika are also preparing guidance for farm operators on behalf of the sector. At this stage a farm operators guide to FWFP mapping has been produced. It is expected that further guidance materials will be provided including farmer and grower facing documentation on how to write FWFPs. A template is being considered by the sector, but this is a live conversation.

CONSIDERATIONS

Strategic Framework and Policy Considerations

[31] The FWFP programme is consistent with the draft Strategic Directions 2023. This includes supporting the vision for Otago, including:

- a. Environment – Otago has a healthy environment ki uta ki tai (from the mountains to the sea), including thriving ecosystems and communities and flourishing biodiversity;
- b. Communities – Otago has cohesive and engaged communities that are connected to the environment and each other;
- c. Partnerships – Otago Regional Council has effective and meaningful partnerships with mana whenua, creating better outcomes for our region.

Financial Considerations

[32] The cost to deliver the implementation plan and to support the Bridge costs for this financial year is unbudgeted.

[33] Staff time contribution to the delivery of this project is significant.

Significance and Engagement Considerations

[34] The implementation of FWFPs throughout Otago involves partnership with mana whenua as well as engagement with key stakeholders, including communities.

[35] Aukaha and Te Ao Marama have provided input into the implementation plan and have expectations this will be delivered.

Legislative and Risk Considerations

[36] FWFPs are a legal instrument established under Part 9A of the RMA (sections 217A to 217M). Council must implement this legislation.

Climate Change Considerations

[37] There are no climate change considerations associated with this report.

Communications Considerations

- [38] Communications are being led at the national level and Te Uru Kahika and MfE have provided support to Councils in this regard. A communications plan has been developed for ORC to support the delivery of the implementation plan.

NEXT STEPS

- [39] Continued delivery of the implementation plan and communications plan.
- [40] Development of the CCCV and publishing this prior to Christmas.
- [41] Regional training to be developed for certifiers and auditors.

ATTACHMENTS

1. 20 August 2023 ORC Final Project Implementation Plan [7.3.1 - 17 pages]

Otago Regional Council Freshwater Farm Plans: Final Implementation Plan

August 2023

1. Purpose

This Draft Implementation Plan provides clarity on the actions required to implement FWFPs in Otago. It is submitted as a draft, to provide an opportunity to provide feedback and direction on the implementation plan.

The intention is that the implementation plan will remain a living document, used to achieve two primary purposes:

1. To guide the development of workstream project plans
2. To use as a basis for discussion with iwi and key stakeholders

2. Context

As part of the Government's Essential Freshwater Package Freshwater Farm Plans (FWFPs) are a legal instrument established under Part 9A of the RMA (sections 217A to 217M) in 2020. FWFPs will encourage actions to reduce a farm's impact on freshwater. They will provide farmers the flexibility to find the right solution for their farm and catchment. Many farmers already have a farm environment plan or are part of an industry programme and freshwater farms plans will build on that work.

A FWFP will be required if the farm is:

- 20 hectares or more in arable or pastoral use
- Five hectares or more in horticultural use
- 20 hectares or more of combined use.

The Resource Management (Freshwater Farm Plans) Regulations 2023 (FWFP regulations) were gazetted on 6 June 2023. The Otago Region is part of the second tranche of councils required to implement FWFPs, where regulations are expected to take effect by 1 February 2024. Refer to Council Paper, *Freshwater Farm Plans*, prepared for Council Meeting 28 June 2023, for additional background and context for FWFPs.

Council has endorsed the proposed rollout order across the Otago Region, which commences with North Otago in February 2024, followed by Lower Clutha in August 2024 (see Table 1 below for all FMU rollout dates). This proposed order is yet to be confirmed by the Ministry for the Environment (MfE) but this confirmation is expected in August 2023.

Table 1: Proposed Otago FWFP Rollout dates, from Council meeting paper, 28 June 2023.

Order	Catchment	Commencement date	Anticipated Number of farms	Approximate area to be covered by FWFPs (hectares)*
1	North Otago FMU	February 2024	756	265,264.22
2	Lower Clutha rohe	August 2024	821	337,327.65
3	Rest Clutha FMU (Upper Dunstan, Manuherekia, Roxburgh)	February 2025	913	1,033,254.2
4	Taiari FMU	August 2025	520	484,742.14
4	Catlins FMU	August 2025	185	83,944.39
5	Dunedin and Coast FMU	December 2025	342	86,338.81

*note that some of these measurements cover farms which are across FMU boundaries and incorporate parts of farms.

Otago Regional Council will have a significant role in supporting the implementation of FWFPs in the Otago Region. ORC's responsibilities include:

- Creating, compiling and providing Catchment Context Challenges and Values (CCCV) information.
- Providing regional training to certifiers and auditors and appointing these certifiers and auditors.
- Ensuring compliance with FWFP regulatory obligations.
- Embedding FWFPs in the regional regulatory framework (LWRP).
- Providing clarity to farmers, growers, industry groups, catchment groups and rural professionals on regulatory expectations and where to get support.

Central government, iwi and those listed above will also have roles within the FWFP system, and these roles will be critical to timely delivery of regulatory objectives and delivery of community outcomes. Some of these roles and responsibilities are illustrated in figure 1 below, which aligns with the farmer journey towards developing a FWFP.

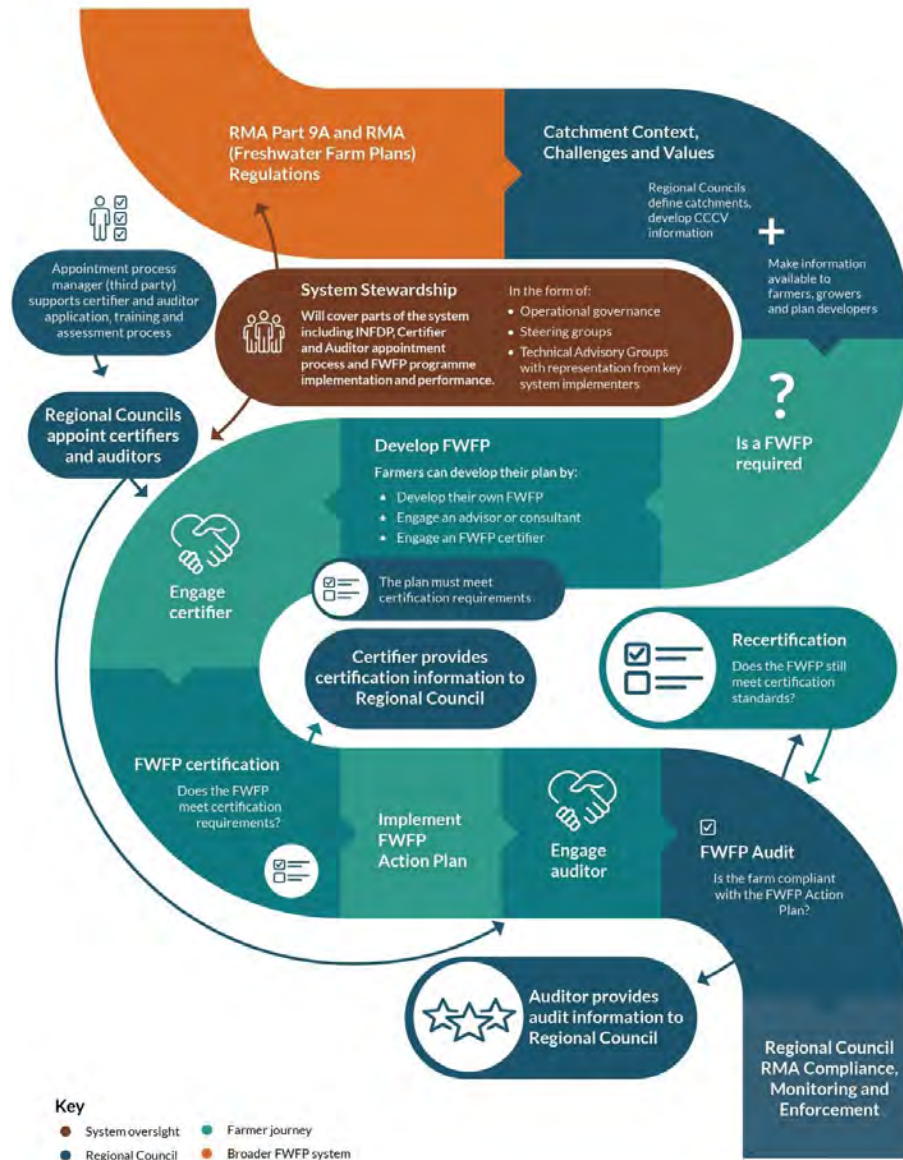


Figure 1 The Farmer Freshwater Farm Plan Journey. Source: MfE

3. Scope

This plan sets out the outcomes, objectives, activities, deliverables, tasks and ORC teams responsible for the implementation of Freshwater Farm Plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. It also identifies potential roles and responsibilities of iwi, key stakeholders, key risks and mitigation strategies.

The implementation plan covers the period from gazettal of regulations (June 2023) to full implementation of these regulations across the Otago Region (mid 2027).

Please note that this draft implementation plan does not consider the resourcing requirements needed for delivery. The draft plan focusses on what needs to be delivered, rather than the resourcing required to deliver it.

4. Structure of Plan

- i. The Draft Implementation Plan begins by setting out the principles and approaches that have guided its development.
- ii. A logic model conceptualises FWFP system delivery.
- iii. Roles and responsibilities of those involved in FWFP implementation and risks and mitigations to delivery are identified.
- iv. A summary of delivery phases captures key dates and activities. More detail on these phases, workstreams, objectives, deliverables and tasks is set out in a table following the summary.

5. Principles and Approaches

Time for delivery of freshwater farm plans is short. Additionally, implementation of Freshwater Farm Plans may require a step change for the farming and growing community, and those supporting them. Significant resources will be required to achieve community engagement and implementation. ORC has a critical role in providing clarity and support and due to the new approach of Certifiers and Auditors will need to partner with others to achieve shared outcomes. Given these factors, this implementation plan adopts the following principles and approaches:

1. **Avoid re-inventing the wheel.** Utilise other regional approaches and central government support effectively to support efficient delivery.
2. **ORC resources are limited.** Work closely with parallel ORC workstreams to maximise efficient use of ORC resources.
3. **Freshwater Farm Plan implementation will require work at multiple scales.** For example, stakeholder engagement is needed at regional, FMU and catchment scale.
4. **Freshwater Farm Plans require a relationship-based approach.** Partner with others to leverage stakeholder networks and achieve behaviour change.
5. **Monitor and adapt as you go.** Set up monitoring and evaluation processes to capture learnings and improve as needed.

6. Roles and responsibilities

It is important to understand the roles that ORC, iwi/rūnaka and stakeholders could potentially or be expected to play in delivery of the FWFP system. This understanding will assist ORC in planning its activities to align and fill gaps where needed.

Some of the roles are more certain, such as MfE's role in overall system oversight. Others are yet to be explored and confirmed with iwi and stakeholders.

Table 1 Stakeholder and Iwi Roles and Responsibilities

Organisation/s	Potential/expected role
MfE	Oversight of system FWFP Guidance
Te Uru Kahika	<ul style="list-style-type: none"> ○ FWFP guidance, coordination, and support.
ORC	<ul style="list-style-type: none"> ○ Compliance Monitoring and Enforcement ○ Compilation of CCCV information and CCCV training ○ Appointment and reviewing competency levels of certifiers and auditors ○ Maintain a certifier and auditor database. ○ Regional training

Organisation/s	Potential/expected role
	<ul style="list-style-type: none"> ○ Support for rural sector ○ Regulatory framework, i.e.: LWRP.
Iwi/rūnaka	<p>Potential roles suggested in MfE guidance: Actual role/s will be shaped by ORC/iwi/rūnaka discussions.</p> <ul style="list-style-type: none"> ○ Contributing to the collation of catchment context information ○ Preparing and delivering certifier and auditor training on catchment context – competencies for certifiers and auditors ○ Oversight of the system, including review and monitoring of system effectiveness, in delivering objectives and outcomes¹
Milk processors	<p>Farmer support</p> <ul style="list-style-type: none"> ○ Transitioning farmers from FEPs to FWFPs
Certification Authority (Assure Quality)	<p>Appointment and certification of certified freshwater farm planners. Assess capability against national (core) requirements:</p> <ul style="list-style-type: none"> ○ Qualification Pathway: in Farm systems/ Natural resource management ○ Experience Pathway: Regulations, Te Ao Māori, Farm systems <p>Undertake core training for certifiers. Maintain a database of certifiers.</p>
NZARM	<ul style="list-style-type: none"> ○ Build capability across the country to support the delivery of FW-FP ○ Support regional assessment of FW-FP delivery that is regionally tailored (to be determined by councils in August 2023). ○ Maintain ongoing networks and communities of practice.
Meat processors	<p>Farmer support</p> <ul style="list-style-type: none"> ○ Transitioning farmers from FEPs to FWFPs
Sector groups	<p>Farmer support</p> <p>Industry environmental programmes, e.g.:</p> <ul style="list-style-type: none"> ○ NZGAP ○ ZQ NZ Merino
Catchment Groups	<p>Catchment groups work within their community and may work with regional councils to identify their catchment priorities.</p> <p>They could also play a key role in:</p> <ul style="list-style-type: none"> ○ supporting the uptake of freshwater farm plans ○ sharing and setting group outcomes ○ advances in farming practice ○ evaluating farm plans as a group to progress catchment outcomes.²
Farm Planners, certifiers, auditors	<p>Current businesses including farm consultants becoming certifiers, auditors or farm planners. They can play a key role in:</p> <ul style="list-style-type: none"> ○ Supporting the uptake of freshwater farm plans ○ Advances in farming practice ○ Evaluating farm plans ○ Undertake certification and auditing process <p>Planners can work alongside farms to progress actions</p>
Irrigation Schemes	<p>Provide support and education. Encourage people to go to meetings and events. Bring in experts (for example NOIC, with MPI funding)</p>

¹ *Tangata Whenua and the Freshwater Farm Plan System. A Guide for Regional Councils. MfE, 2023.*

² MfE [Freshwater farm plans | Ministry for the Environment](#)

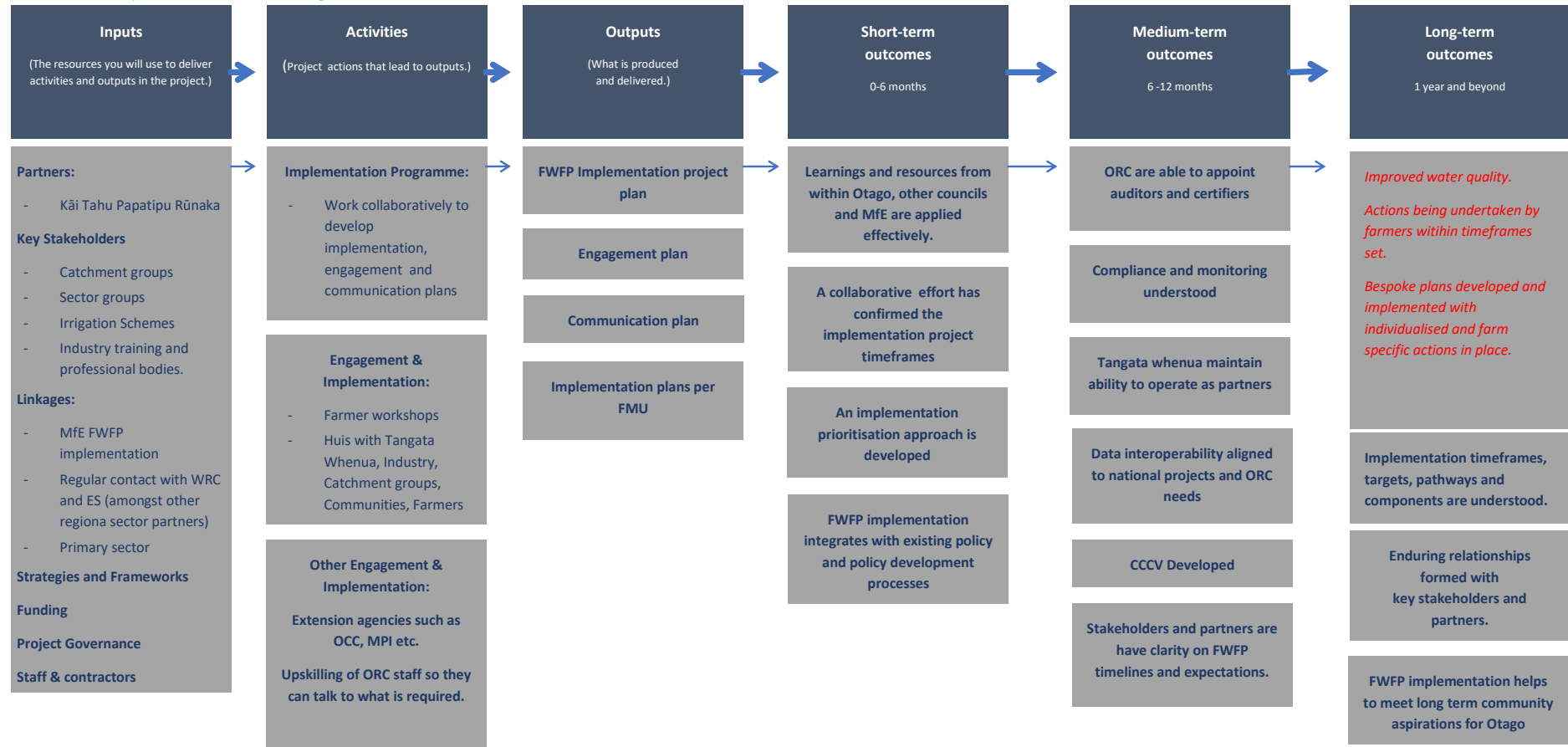
7. Risks and mitigations

These are some significant risks in delivery of FWFPs in Otago. Identifying these risks and potential mitigations is a useful first step in minimising these risks.

Risks	Mitigations
<p>ORC may not have sufficient capacity to deliver FWFP obligations and maximise the opportunity for farmer engagement, enduring behaviour change farmer change and improved environmental outcomes.</p>	<ul style="list-style-type: none"> ○ Identify ORC and stakeholder outcomes, resourcing needs to deliver these outcomes, available capacity and additional resourcing needs. ○ Work closely with stakeholders such as industry, irrigation schemes and catchment groups to align efforts and ensure efficient and effective delivery. ○ Capture and apply learnings from, and share resources with, other regions where FWFPs will be implemented before Otago. E.g.: Southland and Waikato. Capture and apply learnings from Environment Canterbury Farm Environment Plan system. ○ Leverage resourcing available from national bodies, industry, New Zealand Association of Resource Managers (NZARM), New Zealand Institute of Primary Industry Management (NZIPIM), MfE and MPI where national scale capacity is available.
<p>There will not be enough FWFP planners, certifiers and auditors. E.g.: milk companies may not want to, or have the ability to, certify plans, costs of becoming a certifier or auditor may be considered prohibitive</p>	<ul style="list-style-type: none"> ○ Identify value proposition for becoming a planner/certifier/auditor. Include this in messaging to Rural Professionals. ○ Leverage sector networks to promote becoming a FW farm planner, certifier, auditor. ○ Promote opportunity with iwi. ○ Promote with regional employment agencies/training entities. ○ Design regional training with value and accessibility in mind, especially for busy professionals. ○ Leverage existing programmes to develop capability and capacity such as NZARM. ○ Work with MFE and Te Uru Kahika to identify and support resourcing opportunities for Otago.
<p>Farm operators and certifiers may not agree on required actions.</p>	<ul style="list-style-type: none"> ○ Train certifiers in difficult conservations.

Risks	Mitigations
	<ul style="list-style-type: none"> ○ Allow farmers to be aware of their options if they disagree with any aspect of the certifier’s preliminary decision and assessment report to engage with a second certifier (MfE FWFP certification guidance, p. 22). ○ Establish a dispute and compliant register/process, this may include assessment of the certifiers actions.
<p>Certifiers and auditors may take a permissive approach to actions needed for certification and passing audits to secure work.</p>	<ul style="list-style-type: none"> ○ Require certifiers and auditors to sign a code of ethics when operating in Otago. ○ If complaints are received, auditors and certifiers can have appointment revoked. ○ Recertification process, with on-farm assessment. Certifier guidance and procedures to follow.
<p>Farmers may not undertake required actions to have a certified FWFP by the due date.</p>	<ul style="list-style-type: none"> ○ Identify barriers to behaviour change and design strategies and actions to address these. ○ Utilise sector and farmer networks, promote farmer champions for peer-to-peer influence. ○ Communication strategy to inform well before required dates.
<p>Tangata whenua may not have resourcing available to fully participate.</p>	<ul style="list-style-type: none"> ○ Discuss potential opportunities for tangata whenua participation as a package for tangata whenua to indicate interest and desired involvement and determine their priority of effort. ○ Consider how ORC resourcing could be made available to support tangata whenua involvement.
<p>Farmers may not undertake required actions within their certified FWFP and ongoing degradation occurs.</p>	<ul style="list-style-type: none"> ○ Invest in stakeholder engagement to co-design implementation as far as resourcing allows, leverage off farmer, industry and catchment group networks. ○ Understand barriers to change and develop messaging, support and resources to address these barriers. ○ Develop a Compliance and Enforcement strategy that dovetails with delivery of ORC Education and Advice.
<p>Farmers may not understand how the FWFP system relates to the LWRP.</p>	<ul style="list-style-type: none"> ○ Provide clarity on how the FWFP fits with LWRP requirements via Comms channels.

8. FWFP Implementation Programme



9. Summary of Implementation Phases



10. FWFP Implementation Timeline

Workstream and Lead	Objectives	Deliverables (overall/whole region)	June 23-Oct 2023	Nov 2023 – Feb 2024	March 2024 – August 2024	September 2024 – February 2025	March 2025 – December 2025	January 2026- mid 2027
				Feb 2024: North Otago FMU switched on	August 2024: Lower Clutha FMU switched on	February 2025: Rest Clutha FMU switched on	August 2025 Taieri/Taiari & Catlins FMUs switched on December 2025 Dunedin & Coast FMUs switched on	
Tangata whenua partnership Iwi, rūnaka	Give effect to He Mahi Rau Rika in FWFP implementation. Other work undertaken between ORC and Kai Tahu is utilised. TW are provided with the following opportunities: <ul style="list-style-type: none"> contributing to the collation of catchment context information preparing and delivering certifier and auditor training on catchment context – competencies for certifiers and auditors oversight of the system, including review and monitoring of system effectiveness, in delivering objectives and outcomes³. 	Kaupapa for engaging with Kai Tahu/rūnaka (process and desired outcomes, areas of interest/involvement). Tangata whenua engagement plan (including monitoring and evaluation)	Identify related ORC workstreams/key people. Establish Kaupapa for engaging with Kai Tahu/rūnaka. Understand what successful engagement with Kai Tahu/rūnaka means. Identify areas of tangata whenua interest and desired involvement. Build steps above into implementation plan.	Dependent on outcomes of work done in early engagement phase.	Dependent on outcomes of work done in early engagement phase.	Dependent on outcomes of work done in early engagement phase.	Dependent on outcomes of work done in early engagement phase.	Dependent on outcomes of work done in early engagement phase.

³ Tangata Whenua and the Freshwater Farm Plan System. A Guide for Regional Councils. MfE, 2023.

Workstream and Lead	Objectives	Deliverables (overall/whole region)	June 23-Oct 2023	Nov 2023 – Feb 2024	March 2024 – August 2024	September 2024 – February 2025	March 2025 – December 2025	January 2026- mid 2027
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<p>Stakeholder engagement and Comms.</p> <p>Sector groups Farmers and growers Rural professionals - farm planners/certifiers/auditors - Farm advisors/lenders Catchment Groups/collectives</p> <p>Overall responsibility: Manager Environmental Implementation and Manager Comms and Marketing</p>	<p>Give effect to He Mahi Rau Rika in FWFP implementation. Other work undertaken by ORC with stakeholders is utilised.</p> <p>Sector groups, farmers, growers, rural professionals, and catchment groups/collectives are provided with clarity on FWFP timelines and expectations.</p> <p>Sector group input into and support for ORC implementation approach is achieved.</p> <p>Sector group, rural professionals and catchment group/collective networks are used effectively for FWFP messaging.</p>	<p>Stakeholder mapping</p> <p>Stocktake of farm environment plans, assurance schemes.</p> <p>Stakeholder engagement plan (including monitoring and evaluation).</p> <p>Comms Plan</p> <p>X monthly meetings with ORC FWFP Working Group</p> <p>X meetings with sector groups</p> <p>X RP events</p> <p>X meetings/workshops with catchment collectives (catchment groups, irrigation companies).</p> <p>X direct farmer engagement meetings/events.</p> <p>Regular social media and traditional media.</p> <p>Gap analysis of resources available.</p> <p>Resources such as templates and guidelines.</p>	<p>Hold ORC FWFP Working Group monthly meetings (ongoing).</p> <p>Communicate FWFP objectives, timing and needs to community engagement team.</p> <p>Undertake stakeholder mapping (roles in FWFP delivery/interest/influence)</p> <ul style="list-style-type: none"> Region-wide North Otago Lower Clutha <p>Identify stakeholder objectives and outcomes.</p> <p>Identify comms. messages (including value propositions for target groups), audience, channels & timing.</p> <p>Undertake gap analysis of ORC and external resources.</p> <p>Understand communications overlap alignment with other projects.</p> <p>Develop and deliver media campaign:</p> <ul style="list-style-type: none"> Rural news, sector groups catchment networks. 	<p>Undertake stakeholder mapping (roles/interest/influence)</p> <ul style="list-style-type: none"> Rest of Clutha <p>Identify stakeholder outcomes (ORC and above stakeholders’ desired outcomes & expectations of ORC).</p> <p>Targeted communication to North Otago farmers and growers (FWFP due date, CCCV package being developed, where to get support).</p> <p>Targeted North Otago farmer workshops, in partnership with sector groups and catchment groups.</p> <p>Region wide communication ongoing.</p>	<p>Undertake stakeholder mapping (roles/interest/influence)</p> <ul style="list-style-type: none"> Taieri/Taiari, Catlins <p>Identify stakeholder outcomes (ORC and above stakeholders’ desired outcomes & expectations of ORC).</p> <p>Targeted communication to Lower Clutha farmers and growers (FWFP due date, CCCV package being developed, where to get support).</p> <p>Targeted Lower Clutha farmer workshops, in partnership with sector groups and catchment groups.</p> <p>Targeted communication to North Otago farmers (FWFP due date, CCCV package available, where to get support).</p> <p>Targeted North Otago farmer workshops, in partnership with sector groups and catchment groups.</p>	<p>Undertake stakeholder mapping (roles/interest/influence)</p> <ul style="list-style-type: none"> Dunedin, Coast <p>Identify stakeholder outcomes (ORC and above stakeholders’ desired outcomes & expectations of ORC).</p> <p>Targeted communication to rest of Clutha farmers and growers.</p> <p>Identify stakeholder outcomes (ORC and above stakeholders’ desired outcomes & expectations of ORC).</p> <p>Targeted communication to Taieri and Catlins farmers and growers (FWFP due date, CCCV package being developed, where to get support)</p> <p>Targeted Taieri/Taiari and Catlins farmer workshops, in partnership with sector groups and catchment groups.</p> <p>Targeted communication to Lower Clutha farmers and growers (FWFP due</p>	<p>Re-engagement with North Otago and Lower Clutha farmers and growers to assess progress and needs.</p> <p>Targeted communication to North Otago farmers and growers (FWFP due date, CCCV package available, where to get support)</p> <p>Targeted Dunedin and Coast farmer workshops, in partnership with sector groups and catchment groups.</p> <p>Targeted Taieri/Taiari and Catlins farmer workshops, in partnership with sector groups and catchment groups.</p>	<p>Re-engagement with rest of Clutha, Taieri/Taiari and Catlins farmers and growers to assess progress and needs.</p> <p>Targeted communication to Lower Clutha farmers and growers (FWFP due date, CCCV package available, where to get support)</p> <p>Targeted Dunedin and Coast farmer workshops, in partnership with sector groups and catchment groups.</p>

Workstream and Lead	Objectives	Deliverables (overall/whole region)	June 23-Oct 2023	Nov 2023 – Feb 2024	March 2024 – August 2024	September 2024 – February 2025	March 2025 – December 2025	January 2026- mid 2027
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			Develop stakeholder engagement plan and Comms plan. Promote/develop resources as required. Meetings with sector groups RP events (potential to combine/piggyback on other events) Community workshops with OCC, NOSLaM, NOIC, Lower Waitaki Irrigation, industry.		Region wide communication ongoing.	date, CCCV package available, where to get support). Targeted Lower Clutha farmer workshops, in partnership with sector groups and catchment groups.		
CCCV Overall responsibility: Senior GIS Analyst, Manager Policy and Planning and Manager Science	Learnings and resources from other councils and MfE are applied effectively. CCCV information incorporates content requirements from MfE Guidelines. ⁴ CCCV information is compiled in a timely manner.	Project plan for CCCV workstream. Participation in regional sector FWFP implementation forums. Defined catchments and scale that CCCV is implemented. Required CCCV information. CCCV gap assessment.	Develop Project Plan for CCCV workstream. Identify regional sector collaboration and information sharing opportunities and establish working relationships. Define North Otago catchments Identify North Otago CCCV information needed ⁶	Undertake work to fill gaps in North Otago CCCV information according to priority and available resourcing. Review and update North Otago CCCV package. Define Lower Clutha catchments Identify Lower Clutha CCCV information needed ⁷	Undertake work to fill gaps in Lower Clutha CCCV information according to priority. Review and update Lower Clutha CCCV package. Define rest of Clutha catchments. Identify rest of Clutha CCCV information needed ⁸	Undertake work to fill gaps in rest of Clutha CCCV information according to priority. Review and update rest of Clutha CCCV package. Define Taieri/Taiari and Catlins catchments. Identify Taieri/Taiari and Catlins CCCV information needed ⁹	Undertake work to fill gaps in Taieri/Taiari and Catlins CCCV information according to priority. Review and update Taieri/Taiari and Catlins CCCV package Define Dunedin and Coast catchments.	Refine and update CCCV packages. Ongoing training in CCCV.

⁴ Guidance on Preparing Catchment Context and Values Information. Table 1, p.10.

⁶ Ibid

⁷ Ibid

⁸ Ibid

⁹ Ibid

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	<p>CCCV information is engaging, and farmer focussed.</p> <p>Catchment communities' views on CCCV are incorporated. Tangata whenua views on CCCV are incorporated.</p>	<p>CCCV information prioritised list.⁵</p> <p>New CCCV information (to fill identified gaps)</p> <p>CCCV end user design</p> <p>End user testing results</p> <p>Refined CCCV information.</p> <p>Published CCCV information.</p> <p>Certifiers and auditors trained in CCCV.</p> <p>CCCV review process developed.</p>	<p>Compile and assess gaps in North Otago CCCV information held.</p> <p>Design interim CCCV information for North Otago communities.</p> <p>Test interim North Otago CCCV package with farmers and growers.</p> <p>Publish interim North Otago CCCV package.</p> <p>Train North Otago certifiers and auditors in CCCV.</p> <p>Decide priority gaps to fill in North Otago CCCV information, when and how.</p>	<p>Compile and assess gaps in Lower Clutha CCCV information held.</p> <p>Design interim CCCV information for Lower Clutha communities.</p> <p>Test interim Lower Clutha CCCV package with farmers and growers.</p> <p>Publish interim Lower Clutha CCCV package.</p> <p>Train Lower Clutha certifiers and auditors in CCCV.</p> <p>Decide priority gaps to fill in Lower Clutha, when and how.</p>	<p>Compile and assess gaps in rest of Clutha information held.</p> <p>Design interim CCCV information for rest of Clutha communities.</p> <p>Test interim rest of Clutha package with farmers and growers.</p> <p>Publish interim rest of Clutha CCCV package.</p> <p>Train rest of Clutha certifiers and auditors in CCCV.</p> <p>Decide priority gaps to fill in rest of Clutha, when and how.</p>	<p>Compile and assess gaps in Taieri/Taiari and Catlins information held.</p> <p>Design interim CCCV information Taieri/Taiari and Catlins communities.</p> <p>Test interim Taieri and Catlins package with farmers and growers.</p> <p>Publish interim Taieri/Taiari and Catlins CCCV package.</p> <p>Train Taieri/Taiari and Catlins certifiers and auditors in CCCV.</p> <p>Decide priority gaps to fill in Taieri/Taiari and Catlins, when and how.</p>	<p>Identify Dunedin and Coast CCCV information needed¹⁰</p> <p>Compile and assess gaps in Dunedin and Coast information held.</p> <p>Design interim CCCV information for Dunedin and Coast communities.</p> <p>Test interim Dunedin and Coast package with farmers and growers.</p> <p>Publish interim Dunedin and Coast CCCV package.</p> <p>Train Dunedin and Coast certifiers and auditors in CCCV.</p> <p>Decide priority gaps to fill in Dunedin and Coast, when and how.</p>	

⁵ Informed by MfE guidance.

¹⁰ Ibid

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Integration with policy and planning - RPS - PLWRP	RPS and PLWRP processes and outputs are utilised for FWFP implementation to avoid consultation fatigue and enable efficient use of ORC resources. CCCVs integrate with regional planning and policy work on CCCVs. FWFPs align/give effect/are integrated with RPS and PLWRP provisions.	Assessment of RPS and PLWRP process and outputs and potential alignment with FWFP implementation. Project plan for integration of FWFP implementation with policy and planning. Including process for integrating new regulation. Collation of CCCV policy and planning information (including central government policy).	Communicate FWFP objectives, timing and needs to policy team. Identify RPS and PLWRP processes and outputs of relevance to FWFP implementation. Develop project plan. Identify and compile North Otago FMU policy and planning information. Include central government policy and region-wide policy.	Compile Lower Clutha FMU policy and planning information.	Compile rest of Clutha FMU policy and planning information.	Compile Taiari/Taiari and Catlins FMU policy and planning information.	Compile Dunedin and Coast FMU policy and planning information.	
Data management Overall responsibility: Manager Regulatory Data	Ensure a data management and reporting system that: - Integrates with existing systems (IRIS) - Enables data storage and tracking of FWFP status. Enables reporting internally, to MfE and other interested parties.	Data management system that is fit for purpose.	Data gap analysis: - Ascertain the alignment or gaps with current ORC data processes and what is required in the RMA, and needed for ORC to undertake its functions in FWFP. Understand INFDP role. Its timelines and its integration with ORC and industry plans.	Project plan for data management complete. Data storage, reporting and security project underway. Data management project tested and reviewed. Data management project finalised.	CCCV and farming impacts data available to the public. FWFP data used to inform reporting. FWFP data used for monitoring and evaluation to support topics and places that may require additional support, effort and resourcing.			

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Certification and Auditing Overall Responsibility: Manager Compliance and Manager Environmental Implementation	Understand resourcing and capability available. Appoint certifiers and auditors. Develop guidance and training aligned to CCCV, PLWRP and internal government guidance.	X number of certifiers X number of auditors Guidance and training procedures for certifiers and auditors. Workshops and/or training events for certifiers.	Create certification strategy, including procedures, appointment process and requirements for certifiers and farmers. Identify and compile a list of businesses/people who are able and indicate interest in being certifiers. Define the amount of resourcing and capacity needed. Identify certifier and auditor needs.	Implement appointment process of certifiers. Training of certifiers through written guidance and workshops.	Trial certification process on select number of North Otago farms. Gain feedback on the process, adjust where required. Create and implement a complaints and second certification procedures and process	North Otago FMU certification requirement triggered. Communicate with farmers certification requirements and processes. Identify and appoint auditors. Training and guidance prepared and distributed to auditors.	Review Certification process, and progress on plans certified. North Otago FMU auditing requirement triggered. Lower Clutha FMU certification requirement triggered.	
Compliance and enforcement Overall responsibility: Manager Compliance	Effective policies and procedures in place for compliance monitoring and enforcement.	CME Strategy Stocktake of farm environment plans, assurance schemes. Policies and procedures in place for compliance monitoring and enforcement. Audit data management system.	Undertake stocktake of farm environment plans, assurance schemes.	Identify where FWFPs may be required. Undertake risk assessment to understand where compliance efforts may need to be focussed and where proactive and targeted education may be needed.		Make data management tool available for auditors to register farm grades. Targeted comms to North Otago farmers.	North Otago FMU due – commence compliance monitoring.	
Advice and information workstream Overall responsibility: Manager Consents	Advice and information requests are responded to efficiently and effectively. Clear and timely advice is provided	Triaged and allocated requests. Responses to requests, where appropriate. Register of requests and responses to Frequently Asked Questions	Identify ORC technical experts, communicate workstream needs and/or seek manager approval, where outside of ORC FWFP working group. Establish register of requests and responses to	Maintain register of requests and responses to FAQs. Translate FAQs and communicate through Comms. channels.	Maintain register of requests and responses to FAQs. Translate FAQs and communicate through Comms. channels.	Maintain register of requests and responses to FAQs. Translate FAQs and communicate through Comms. channels.	Maintain register of requests and responses to FAQs. Translate FAQs and communicate	Maintain register of requests and responses to FAQs. Translate FAQs and communicate through Comms. channels.

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	to ORC and the community.	Scalable approaches that provide efficient ways to communicate are developed (website, field sheets, powerpoints).	Frequently Asked Questions Establish process for translating/communicating FAQs through Comms. channels. Translate FAQs and communicate through Comms. channels.				through Comms. channels.	

Attachment 1: FWFP Development

