

# **SUMMARY OF DECISIONS REQUESTED**

*Incorporating Further Submissions*

**on  
Proposed Plan Change 6A  
(Water Quality)**

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



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4650 Matarae Station Ltd	264	Chapman-Cohen, Angus	9
Adams, H F	55	City Forests Limited	283
Alliance Group Limited	187	Clarke, Andrea	305
ALT Holdings LTD	274	Clutha Agricultural Development Board	139
Amende, Deanne & Steve	205	Clutha District Council	308
Anderson, AJ & AJ	120	Clyde Dairy Farm Ltd	196
Anderson, Hamish	221	Clydevale Dairy Farms Ltd	297
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APS Heckler Family Trust	218	Cole, Stephen	8
B Landreth Ltd	253	Cone, Alan G & Bagrie, Judy	38
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Ballance Agri-Nutrients Ltd	262	Contact Energy Limited	284
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Central Otago District Council & Clutha District Council	309	Edwards, Lydia	25
Central Otago Environmental Society Inc	233	Elderslie Dairy Farms Limited	115

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Elliot, AWB	324	Hayward, Steve	44
Environmental Defence Society	267	Henderson, Duncan	100
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Rawlinson, Michael	121	Sunset Dairy Limited & van Vugt, Rob	317
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<b>Surname, First Name or Organisation</b>	<b>Submitter #</b>	<b>Surname, First Name or Organisation</b>	<b>Submitter #</b>
Williams, Richard	329	Wilson, Roy A	49
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Willowview Pastures Ltd	214	Wyllies Crossing Limited	312
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## Index to Original Submitters – By Number

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2	Constance, Helen	45	Hopefield Investments Ltd (C Cochrane)
3	Wharton, David	46	Mosgiel Taieri Community Board
4	Rawle, Colin	47	Boyes, Des
5	Ford, Martin	48	Werner, Craig
6	McCurdy, Andrew	49	Wilson, Roy A
7	Luxmore Dairies	50	Geddes, G & S
8	Cole, Stephen	51	Parks, Marianne & Michael
9	Chapman-Cohen, Angus	52	Robertson, JP
10	Thomas, WH	53	Hollis, Melvyn
11	Shennan, Marianne	54	North Otago Vegetable and Growers Association
12	Williams, Barry	55	Adams, H F
13	Milne, Kelvin	56	Three Creeks Farm Ltd
14	Green, Mrs I	57	University of Otago, Department of Zoology
15	McDonald, Mrs Marie C	58	Mulholland, CP
16	Kearney, Kaye	59	Glenayr Ltd (D & D Sangster)
17	Starke, J	60	Hunt, Phillip
18	Oliver, Jim	61	SH Andrews and Sons Ltd
19	Penny, FR & R	62	Green Party (Dunedin Branch)
20	Martin, Paul	63	Deans, Peter & Deans, Graham
21	Mitchell, Zoe	64	Providence Farm 2007 Ltd
22	Manley, JH	65	Burgess, Gerald
23	Cruickshank, Neil Douglas	66	Burgess, Barry John
24	Sargeant, Tami and Jason	67	Evans, G
25	Edwards, Lydia	68	Ramsay, Greg & Stott, G
26	Pennycuick, Nina	69	Borrie, Peter
28	PR Lyders Trust	70	Hawkdun Idaburn Irrigation Company Ltd
29	Munro, EJ	71	Philpott, BR
30	Scott, Donald	72	Davies, Simon
32	Spooner, Jeanette	73	Crawford, Stephen
33	Mackie, David John	74	Hopgood, Eric
34	McGettigan, Patrick Alexander	75	Loganbrae Ltd
35	Hill, Lynne	76	Glen Ayr Ltd (D & C Dundass)
36	Shag Valley Station	77	Cross Family Trusts
37	Marsh, Wayne & Billee	78	Thompson, Jeff & Alison
38	Cone, Alan G & Bagrie, Judy	79	River-Estuary Care: Waikouaiti-Karitane
39	Hewett Farm Ltd	80	Crawford, Paul
40	Glenorchy Branch of Lakes Landcare	81	Braemorn Farm Ltd
41	Rees Valley Station Limited	82	Fox, Roger
42	Crutchley, GR	83	Invernia Holdings Ltd
43	Isbister, Graeme	84	Kington, Melvyn John
44	Hayward, Steve	85	Petrie, Tim
86	Trevathan, NG & Trevathan, MA	130	Strathburn Limited

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87	McKenzie, John	131	Bradfield, Grant
88	Wilson, Alan L	132	Jackson, Andrew
89	Fox, Ray	133	The Cow Farm Limited
90	Kintyre Farms 2008 Ltd	134	Mitchell, MB & JA
91	Cain, Mark	135	Foxhaven Farms Ltd
92	Paton, ED	136	Mount Gowrie Station
93	Verbakel, AJ & TT	137	PJ & AM Neame Ltd
94	Corboy, Paul	138	Waitaki District Council
95	Strachan, Wallace Evan	139	Clutha Agricultural Development Board
96	Meikle, Trevor	140	Otago Conservation Board
97	Botting, David	141	Neeley, Eloise
98	Val Ridge Farm Ltd	142	Korteweg Family Trust
99	Blumden, Clive	143	ML & PJ Lord Family Trust
100	Henderson, Duncan	144	Hamilton, WL
101	Wallace, Ross & Alexa	145	New Zealand Pork Industry Board
102	Glenshee Station Ltd (P Hore)	146	Dairy NZ Limited
103	Southern District Health Board	147	Pioneer Generation
104	McMillan, Alan	148	Glenshee Station Limited (Marks & Mouat)
105	Rutherford, Alastair	149	Ernslaw One Ltd
106	Lower Waitaki Irrigation Company	150	McNeilly, Dean
107	Groundwater, Daniel	151	Isbister, Grant
108	Keep, Graham A	152	Trust for the estate of WJ Johnston
109	Oughton, John	153	Run 248m Ltd
110	Fox, Barry	154	Shalloch Farms Ltd
111	James, Phil	155	Corona Farms Ltd
112	Cooper, Sarah	156	Richardson, Andrew & Barbara
113	Rudduck, Fiona	157	de Geest, Nigel
114	Teviot Irrigation Company Limited	158	Ranui Partnership
115	Elderslie Dairy Farms Limited	159	Booth, Gerard
116	Morrison, Stewart	160	McNamara, Ruth
117	Hollamby, Bob	161	Kane, Sam
118	Hayes, SA	162	Latta, John
119	PGG Wrightson	163	Matuanui Ltd
120	Anderson, AJ & AJ	164	Strath Taieri Community Board
121	Rawlinson, Michael	165	Gibson, Jim
122	McTainsh, Albert	166	Hunter Valley Station Ltd
123	Isbister Farms Limited	167	Watt, James
124	Young, Jane	168	Dunje, Dawn
125	Finlay Family Trust	169	Mann, Sydney
126	Hawea Community Association	170	Hughes, Tony
127	Mt Aspiring Station	171	JN & JM Lawson Family Trust
128	Gilmour, Cath	172	George, Peter
129	Belmont	173	Hay, Ross
174	Kitson, Niere	216	Butler, Graham

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175	Sopson, Logan	217	Locharburn Grazing Company
176	Diedrichs, Barry	218	APS Heckler Family Trust
177	Ewing Farms Ltd & Haddington Farms Ltd	219	Rimu Downs Ltd
178	Hill, JR	220	Waverley Downs Ltd
179	Black, Gilbert	221	Anderson, Hamish
180	Smale, Dan	222	Fulton Hogan Limited
181	Hubbard, Terisha	223	Bisson, Jeremy
182	Quambatook Ltd	224	Holcim (New Zealand)
183	Stanger, Trevor	225	Preserve Our Water Society Inc
184	Streeter, Kate	226	Shaw, Dave
185	Windsor Park Dairies Ltd	227	Medical Students For Global Awareness
186	Mitchell & Webster Ltd	228	John Newlands Farming Company
187	Alliance Group Limited	229	O'Brien, Lauren
188	Tisdall, Raymond Grant	230	Rowley Family
189	Lovells Creek Farm Ltd	231	Anderson, N
190	Kingan, Bob	232	Kawarau Station Limited
191	Ludemann, Grant	233	Central Otago Environmental Society Inc
192	McNab, Peter	234	O'Connor, Michael
193	Lowery, Rex & Penny	235	Dulce-Domum Trust
194	Wales, Jeremy	236	Raughan, CC & GA
195	Dairy Holdings Limited	237	Blair, David
196	Clyde Dairy Farm Ltd	238	Silver Fern Farms Limited
197	Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	239	Grant, N O
198	Barlow, John	240	Forest Range Ltd
199	Bryant, Ian	241	Fonterra Co-operative Group Limited
200	Hopefield Investments Ltd (R Griffiths)	242	Philip, Rod
201	Rillstone, Dougal	243	Otago Rock Lobster Industry Organisation
202	Irrigation New Zealand Incorporated	244	McLaren, DJ & NA
203	NZ Transport Agency	245	Plunket, Richard
204	NZ Agricultural Aviation Association	246	Otago Commercial Fishing Sector
205	Amende, Deanne & Steve	247	Viewmont Limited
206	Trustpower Limited	248	Ravensdown Fertiliser Co-operative Ltd
207	MCHolland Farming Ltd	249	Sandy Bay Ltd
208	Poplar Grove Station Ltd	250	Waihemo Water Catchment Society Inc
209	Blakely Pacific Limited	251	Meridian Energy Limited
210	Lakes Landcare	252	New Zealand Fertiliser Manufacturers Research Association Inc
211	Dunedin City Council (Water and Waste Services)	253	B Landreth Ltd
212	T A Whiteside & Co Ltd	254	Lee, John & Pezaro, Dennis
213	Kerr, Vivienne & Greg	255	Queenstown Lakes District Council
214	Willowview Pastures Ltd	256	Rayonier New Zealand Ltd
215	Macgregor, Alan Grant	257	Waitaki Irrigators Collective Limited
258	LAC Property Trust	297	Clydevale Dairy Farms Ltd

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259	Smith, B & J	298	Greenfield Farming Ltd
260	North Otago Irrigation Company	299	Big River Dairy Limited
261	Lynch, Bernard	300	Smith, M W
262	Ballance Agri-Nutrients Ltd	301	Pile, William John
263	DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	302	Graylands Farms Ltd
264	4650 Matarae Station Ltd	303	Kirkland, Allan
265	Hogg, Graeme & Jane	304	Wilson, P, H & G
266	Douglas, Clyde	305	Clarke, Andrea
267	Environmental Defence Society	306	The Director-General of Conservation
268	Scurr, Colin	307	Northburn Limited
269	Horticulture New Zealand	308	Clutha District Council
270	Schallenberg, Marc	309	Central Otago District Council & Clutha District Council
271	Forest and Bird	310	Glen Dene Limited
272	Telford, Ken	311	Graham, Ben
273	Fish and Game (Central South Island)	312	Wyllies Crossing Limited
274	ALT Holdings LTD	313	Calder Stewart Industries Limited
275	Scurr, TM and CM	314	Greer Farms Partnerships
276	Guy, Karl	315	DJ & JC Andrew & the DJ Andrew Family Trust & Partnership
277	Kingsbury, Mark	316	Homestead Farm Limited
278	Federated Farmers of New Zealand	317	Rob van Vugt & Sunset Dairy Limited
279	Wenita Forest Products	318	GB & RE Gardner Partnership
280	Stuart, Annie	319	Macraes Community Incorporated
281	Coutts, Sue	320	Mainland Poultry Limited
282	New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	321	Michelle, Travis
283	City Forests Limited	322	Borst, Robert
284	Contact Energy Limited	323	Dunedin International Airport Limited
285	Oceana Gold (New Zealand) Limited	324	Elliot, AWB
286	Cardrona Land Care Group	325	Parks, Simon
287	Fish and Game (Otago)	326	Kyeburn Pastoral Company Ltd
288	Paterson Pitts Partners Ltd	327	Lone Star Farms Ltd
289	Southern Wood Council	328	Rowland, Peter
290	Waitensea Ltd	329	Williams, Richard
291	Beaton Family	330	Sheat, Ronald
292	Otago Water Resource User Group (OWRUG)	331	R & M Borrie Ltd
293	Deer Industry New Zealand	332	Hunter, Graham & Pam
294	MacTavish, Dugald	333	Lake Edge Farms Ltd
295	Smith, Neil	334	Cocks, Alastair
296	Janefield Farm		



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Central Otago Wine Growers Association	1054	Michelle, Mr TR	1037
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Dunedin International Airport Limited	1038	Otago Water Resource Users Group	1056
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1002	Elston, ME	1041	Craig, Mr TE & Mrs JA
1003	Waitaki District Council	1042	Andrew, Mr DJ & Mrs JC
1004	McTainsh, Albert	1043	Macraes Community Incorporated
1005	Lower Waitaki Irrigation Co	1044	Gardner, Mr GV & Mrs RE
1006	Smith, B & J	1045	Elliot, Mr AWB
1007	Forest and Bird NZ	1046	Hodge, Mrs J
1008	Scott, DJ & KR	1047	Van Vught, Mr RP & Mrs RR
1009	Braemorn Farm Ltd	1048	Mainland Poultry Limited
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1011	The Director-General of Conservation	1050	Clutha District Council
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1014	Meridian Energy Limited	1053	Cavanagh, RN & JA
1015	Rayonier New Zealand Limited	1054	Central Otago Wine Growers Association
1016	Ernslaw One Ltd	1055	Environmental Defence Society
1017	Auripo Enterprises Ltd	1056	Otago Water Resource Users Group
1018	Sheat, Ronald	1057	Federated Farmers of New Zealand
1019	Hopefield Investments Ltd	1058	Isa Holdings Ltd
1020	McNally, KA & William, JH	1059	TrustPower
1021	McNally, RJ	1060	Alliance Group Limited
1022	Pringle, Quinten & Bronwyn	1061	North Otago Irrigation Company
1023	Pypers Produce Ltd	1062	Glenshee Station Limited
1024	Heany, Kim & Mary	1063	Webster, John
1025	Dunedin City Council	1064	Mitchell, Peter
1026	Arthur, TJ & NM	1065	Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga Hawkdun Idaburn Irrigation Company Limited
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Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 99</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of "good quality water" and "natural and human use values", particularly that this includes farming and related rural activities.</li> <li>• Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</li> </ul>
Glen Dene Limited	310	Amend	<p>Clarify the relationship between this rule and rule 12.C.0.5.</p> <p>Amend the timeframe or mechanism to account for catchment dynamics.</p> <p>Delete reference to 'where the discharge is about the enter water' and exchange for 'after reasonable mixing'.</p>	<ul style="list-style-type: none"> <li>• Relationship with rule 12.C.0.5 unclear.</li> <li>• Unclear at what point the discharge will be measured.</li> <li>• No provision for reasonable mixing.</li> <li>• Unknown scientific basis is for the 12 hour timeframe.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
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Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 – 326 ref. 99</i>		<ul style="list-style-type: none"> <li>• Difficult to monitor and enforce due to differing performance of catchments following rainfall.</li> <li>• Farmers may not know if they are complying or not at a particular time.</li> <li>• More technical robustness needed.</li> <li>• Need provision for reasonable mixing.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 99</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 99</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

### 100 Rule 12.C.1.3 - Nitrogen loading permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Andrew McCurdy	6	Support	Maintain proposed levels through the process thus protecting water quality - don't water it down.	<ul style="list-style-type: none"> <li>• Stringent setting of specified limits for discharges will protect water quality.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 6 ref. 100</i>		<ul style="list-style-type: none"> <li>• Unworkable, limits not realistic or achievable.</li> <li>• Despite taking precautions farmers may breach limits.</li> <li>• Not appropriate to refer to specific version of Overseer.</li> <li>• Inconsistent with RMA Part II and s107.</li> <li>• Objectives and policies don't support prohibited activity status.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms</i>	1074	<i>Oppose submission 6 ref.</i>		<ul style="list-style-type: none"> <li>• Does not allow flexibility for existing farming operations to give effect to the NPS.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Partnership</i>		100		<ul style="list-style-type: none"> <li>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>Does take into account local environmental conditions and economic/development consideration.</li> </ul>
Hewett Farm Ltd	39	Amend	The 30 kgN/ha per annum target is too low for winter crops and needs specific attention.	<ul style="list-style-type: none"> <li>Negative impact on crop productivity as yields reduced, so larger crop areas needed.</li> <li>Economic and potential environmental implications.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 39 ref. 100		<ul style="list-style-type: none"> <li>Limits not realistic or achievable.</li> <li>Despite taking precautions farmers may breach limits.</li> <li>Not appropriate to refer to specific version of Overseer.</li> <li>Inconsistent with RMA Part II and s107.</li> <li>Objectives and policies don't support prohibited activity status.</li> </ul>
Hewett Farm Ltd	39	Did not specify	Would like some examples explained for given P applications what the impact on DRP levels are, particularly if N applications are substituted for P to get around N loadings.	<ul style="list-style-type: none"> <li>Maintenance fertiliser application (particularly P-based) shouldn't breach 30 kgN, but DRP levels need to take this into account.</li> </ul>
Graeme Isbister	43	Amend	Lift the level of nitrate movement from land to the North Otago Volcanic Aquifer to 30 kgN/ha minimum.	<ul style="list-style-type: none"> <li>10 kgN/ha too low.</li> <li>This water source is not used for human consumption.</li> <li>Nitrate levels only part of water quality problem.</li> <li>Maybe other sources of contaminants going to aquifer (industry, civil population, road runoff, transport industry).</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 43 ref. 100		<ul style="list-style-type: none"> <li>Without this change many farmers will not be able to achieve the standards, despite taking precautions and could put landowners out of business.</li> </ul>
Hopefield Investments Ltd (C Cochrane)	45	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame imposed.	<ul style="list-style-type: none"> <li>Proposed time frame places inequitable financial burden on pastoral farmers.</li> <li>Will devalue ORC's primary sector rating base.</li> <li>Inhibit development and enhancement of resources unless financial assistance granted to landholders.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 45 ref. 100		<ul style="list-style-type: none"> <li>Concerns with workability.</li> <li>Despite precautions may still breach rules, making scheme unworkable with financial costs.</li> </ul>
Marianne & Michael Parks	51	Oppose	Would like more information as to how the Regional Council is likely to obtain a nutrient budget for all land use activities via OVERSEER and how it intends to ensure that fertiliser application is as indicated in the nutrient management plan is as planned.  If this rule change will lead to a whole new bureaucracy, we would not be supportive.	<ul style="list-style-type: none"> <li>Supportive of minimising N fertiliser getting to water.</li> <li>Not supportive of only dairy farms monitored (cropping farms use higher amounts of N).</li> <li>Not supportive if rule change leads to whole new bureaucracy.</li> </ul>
North Otago Vegetable and Growers Association	54	Amend	(i) From 31 March 2019, calculated nitrogen leaching by the Council using OVERSEER version 6.0, does not exceed: (a) 10 kg... (b) 30 kg... (c) 50 kilograms nitrogen per hectare per year over North Otago Volcanic Aquifer.  We request that the ORC undertake a Public Health Risk Assessment of the aquifer in keeping with ORC's effects based ideology for policy and rules.	<ul style="list-style-type: none"> <li>OVERSEER not applicable to market gardening systems in current form.</li> <li>North Otago Volcanic Aquifer about 30 mg/L for nitrates - drinking water standard is 11.3 mg/L.</li> <li>No domestic or communal supplies from aquifer.</li> </ul>
<i>Horticulture New Zealand</i>	1032	Support submission 54 ref. 100		<ul style="list-style-type: none"> <li>OVERSEER not appropriate tool for horticulture crops.</li> </ul>
<i>John Webster</i>	1063	Support		<ul style="list-style-type: none"> <li>Question if inclusion of 50kg N/ha reflects confusion over the NOVA area and</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 54 ref. 100</i>		<i>whether it is in a 10, 30 or 50 kg zone as was talked about at initial briefings by ORC.</i>
<i>Nicholas Webster</i>	1069	<i>Support submission 54 ref. 100</i>		<i>• Agree Overseer is not a tested model for predicting nitrogen loss under market gardening.</i>
Three Creeks Farm Ltd	56	Oppose	The proposed nitrogen loading is unrealistic at 10 or 30 kg/ha.	<ul style="list-style-type: none"> <li>• Based on a model yet to be tested and peer reviewed within this or any other catchment in Otago.</li> <li>• Doesn't account for distinct different regions and farming systems.</li> <li>• Proposed limit will make my farming system untenable.</li> <li>• Contrary to RMA and ORC objectives in setting sustainable limits.</li> <li>• Loading limits unworkable.</li> <li>• Loss of tree shelter and effects on animal welfare, with change to spray irrigation.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 56 ref. 100</i>		<i>• Rule is unscientific, uncertain and unworkable.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 56 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 56 ref. 100</i>		<i>• Farmers must be allowed to take into account local environmental conditions and economic/development consideration.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 56 ref. 100</i>		<i>• No reasons given.</i>
Glenayr Ltd (D & D Sangster)	59	Amend	Needs to be a discretionary activity as one size does not fit all.	<ul style="list-style-type: none"> <li>• Graze cows/calves on some wetlands at low stocking rate.</li> <li>• Put minimal fertiliser on land.</li> <li>• Every farm has different circumstances and a lot of our swamp is at times dryland.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 59 ref. 100</i>		<i>• Discretionary activity status not necessary to address potential effects.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 59 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
Green Party (Dunedin Branch)	62	Support	The transition times for meeting discharge standards after notification of a failure to meet these standards is far too long at 7 years for total nitrogen and 5 years for all other discharges in particular waterways as set out in Schedule 15. We would recommend a 2 year period.	<ul style="list-style-type: none"> <li>• Support load limits of nitrogen, and classification of aquifers into two types.</li> <li>• Issue is urgent, cannot allow to drift for five years.</li> <li>• ORC to accept responsibility for decline in water quality.</li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 62 ref. 100</i>		<i>• Request is inappropriate and unreasonable and would place unnecessary costs on resource users.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 100</i>		<i>• A two-year transition period is too short.</i>
<i>Mr RJ Borst</i>	1034			
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 62 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Unreasonably short timeframe.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 62 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Reduction in lead in time unworkable and not achievable.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 62 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Discharge standards questionable as to attainability, if retained an equitable timeframe to attempt to attain them will be required.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Does not allow flexibility for existing farming operations to give effect to the NPS.</i></li> <li>• <i>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</i></li> <li>• <i>Does take into account local environmental conditions and economic/development consideration.</i></li> <li>• <i>Disproportionate and overly restrictive.</i></li> </ul>
Peter Deans & Graham Deans	63	Amend	12.C.1.3 (b) Amend so 30kg nitrogen per hectare per year averaged out over whole farm per year e.g. not just crop paddocks.	<ul style="list-style-type: none"> <li>• Average over whole farm.</li> </ul>
Providence Farm 2007 Ltd	64	Oppose	Removal of nitrogen loading limits 10 and 30kg/ha.	<ul style="list-style-type: none"> <li>• Unrealistic, based on a model which has yet to be tested and peer reviewed.</li> <li>• Doesn't account for distinctive regions and farming systems.</li> <li>• Unworkable, make my farming system (including border-dyking) untenable.</li> <li>• Contrary to the RMA and ORC objectives to set limits in a sustainable way.</li> <li>• Timespan between notification and end of the submission period leaves little opportunity for making a researched submission based on true consultative basis.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 64 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions and systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
G Evans	67	Did not specify	(b) 30 kgN/ha/farm elsewhere in Otago.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Peter T Borrie	69	Amend	I will accept any figure of more than 30 kg per ha of nitrogen that the Lower Waitaki Irrigation Company expert witness determines.	<ul style="list-style-type: none"> <li>• 30kg N/ha unachievable for border dyke, dairy or intensive grazing farm.</li> <li>• In Lower Waitaki about 10,000 ha border dyke, 90% dairying for more than 5 years.</li> <li>• More farms convert from border dyke to spray irrigation yearly, and more DCD used (lower nitrates).</li> <li>• Disadvantages of moving from border dyke irrigation - trees and wetlands</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				removed, increased energy use, large capital investment. <ul style="list-style-type: none"> <li>• Welcome Creek spring fed, salmon hatchery established, trout flourish.</li> <li>• Drinking water in Lower Waitaki above WHO standards.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 69 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Amend	Should all be permitted.	<ul style="list-style-type: none"> <li>• Repair and maintenance of irrigation systems.</li> <li>• Region wide standards and limits - regional or local conditions vary, so common sense has to be balancing factor.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 70 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i></li> <li>• <i>Farmers may not know if they are complying or not at a particular time.</i></li> <li>• <i>More technical robustness needed.</i></li> <li>• <i>Need provision for reasonable mixing.</i></li> </ul>
Loganbrae Ltd	75	Amend	Needs to be a discretionary activity.	<ul style="list-style-type: none"> <li>• Graze cows/calves on some wetlands at low stocking rate.</li> <li>• Put minimal fertiliser on land.</li> <li>• Every farm has different circumstances and a lot of our swamp is at times dryland.</li> </ul>
Glen Ayr Ltd (D & C Dundass)	76	Amend	Needs to be a discretionary activity.	<ul style="list-style-type: none"> <li>• Concerned about implications for significant wetlands.</li> <li>• Farming practices differ between farms e.g. Sheep/beef compared to dairy.</li> <li>• <b>Have minimal stocking rates (beef) and don't apply fertiliser.</b></li> </ul>
Cross Family Trusts	77	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame imposed.	<ul style="list-style-type: none"> <li>• Proposed timeframe for change places inequitable financial burden upon pastoral farmers.</li> <li>• Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources.</li> </ul>
Jeff & Alison Thompson	78	Amend	More research needs to be done to ensure levels are going to be achievable for most farms within a reasonable cost.  Realistic expectations established as to how these can be worked on.	<ul style="list-style-type: none"> <li>• Levels permitted in new rules too low and unrealistic, will have serious impacts on financial viability of farming and wider community.</li> <li>• Important that research is done into water quality levels from farms on a variety of soil types and farming operations to demonstrate that these ideals are achievable in all parts of Otago.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 78 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions and systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> </ul>
Braemorn Farm Ltd	81	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> <li>• Levels based on Canterbury work, no on-site scientific studies.</li> <li>• OVERSEER 6.0 unknown model at this time.</li> <li>• Existing farms in sensitive areas require large operational changes.</li> <li>• No study on economic effect.</li> <li>• North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 81 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions and systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
Roger Fox	82	Amend	Relies too heavily on (OVERSEER 6.0). [Amounts in 12.C.1.3 (i) (a) and (b)] too low and unproven, particularly (a).	<ul style="list-style-type: none"> <li>• More investigation, is it a sturdy tool?</li> <li>• Too low and unproven.</li> </ul>
Invernia Holdings Ltd	83	Amend	Increase levels [from 30kg/ha in (i)(b)] to a workable economic level.	<ul style="list-style-type: none"> <li>• 30 kg/ha unachievable with present methods.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 83</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Melvyn John Kington	84	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> <li>• Levels based on Canterbury work, no on-site scientific studies.</li> <li>• OVERSEER 6.0 unknown model at this time.</li> <li>• Existing farms in sensitive areas require large operational changes.</li> <li>• No study on economic effect.</li> <li>• North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?</li> </ul>
Tim Petrie	85			
John McKenzie	87			
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submissions 84, 85 &amp; 87 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Alan L Wilson	88	Amend	Would like the standard reduced to a level we can all achieve.	<ul style="list-style-type: none"> <li>• Support high water quality in principle, but standard too high, may be higher than natural state without stock, impossible to achieve.</li> </ul>
Mark Cain	91	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> <li>• Levels based on Canterbury work, no on-site scientific studies.</li> <li>• OVERSEER 6.0 unknown model at this time.</li> <li>• Existing farms in sensitive areas require large operational changes.</li> <li>• No study on economic effect.</li> <li>• North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 91 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
A J & T T Verbakel	93	Amend	[Rule 12.C.1.3(i)(b) should be] 50 kg Nitrogen for Waitaki Plains area.	<ul style="list-style-type: none"> <li>• Little change in Welcome Stream water quality over last 15 years, with significant increase in cow numbers.</li> </ul>
Wallace Evan Strachan	95	Oppose	[Rule 12.C.1.3(i)(b) should read] 45kg N/ha elsewhere in Otago.	<ul style="list-style-type: none"> <li>• Graph trends for bore J41/0317 show decline over last 3 years.</li> </ul>
Trevor Meikle	96	Amend	Amend the nitrogen cap to a higher level to allow present day farming operations to be able to function successfully.	<ul style="list-style-type: none"> <li>• Proposed nitrogen cap will impact negatively on future farming viability.</li> </ul>
Val Ridge Farm Ltd	98	Amend	Amend the proposed nitrogen cap to a higher level to allow present farming businesses to operate successfully.	<ul style="list-style-type: none"> <li>• Proposed nitrogen cap will impact negatively on future farming viability.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 98 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Duncan Henderson	100	Support	Do not change rule.	<ul style="list-style-type: none"> <li>• Do not change new rules on Nitrogen and other fertiliser.</li> <li>• Leaching from old mining sites cause contamination.</li> </ul>
Lower Waitaki Irrigation Company	106	Amend	<p>Recognise the Waitaki Plains as a special designated area and allow calculated nitrogen leaching to be greater than the proposed 30 kg limit per hectare per year.</p> <p>If science based evidence proves a need to convert from border dyke irrigation to spray irrigation then a long time frame be allowed.</p> <p>ORC to provide an accurate tool for arable properties to measure losses.</p>	<ul style="list-style-type: none"> <li>• Support principle of effects-based plan.</li> <li>• Overseer is not configured to cope with arable properties, and version 6 currently unavailable to establish nutrient losses.</li> <li>• Use of Overseer not consulted on, not effects-based - current groundwater quality extremely good and area almost completely intensive dairy or dairy support.</li> <li>• Longer timeframes needed if major irrigation infrastructure change to the company water distribution network and financial investment required (9000 ha of Waitaki Plains, estimated \$50 million+).</li> <li>• Under border dyking, 30 kg unachievable without reducing stock numbers up</li> </ul>

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				<ul style="list-style-type: none"> <li>to 40%.</li> <li>Preliminary modelling shows targets unachievable under spray irrigation methods.</li> <li>Health of Welcome Stream improving, supports salmon hatchery.</li> <li>Waitaki River administered by Ecan, high volume river not affected by local activity in lower reaches.</li> <li>Border dyking dilutes nitrates, concentration in aquifer lower due to assimilation.</li> <li>Spray irrigation has greater carbon footprint, could affect planted amenity shelters.</li> <li>Water use efficiency a separate issue.</li> <li>One size fits all approach does not work for the North Otago area.</li> <li>Limits will restrict production and harm the community, with no additional environmental benefit.</li> <li>More research on state of Lower Waitaki Plains aquifer is needed.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 106 ref. 100</i>		<ul style="list-style-type: none"> <li><i>Under border dyking 30kg limit not achievable.</i></li> <li><i>Would reduce stock numbers, restrict production and harm community without science or environmental benefit.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 106 ref. 100</i>		<ul style="list-style-type: none"> <li><i>The direct or indirect discharges of nutrients to water is opposed.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 106 ref. 100</i>		<ul style="list-style-type: none"> <li><i>Reliance on one version of OVERSEER is overly restrictive.</i></li> <li><i>Greater flexibility on timeframes should be afforded.</i></li> </ul>
Daniel Groundwater	107	Oppose	Delay implementation.	<ul style="list-style-type: none"> <li>To allow better research to be carried out for feasibility.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 107 ref. 100</i>		<ul style="list-style-type: none"> <li><i>Measures not realistic and don't account for differing regions and systems.</i></li> <li><i>Farmers may breach limits despite taking precautions.</i></li> </ul>
Barry Fox	110	Oppose	Delay implementation.	<ul style="list-style-type: none"> <li>North Otago Volcanic Aquifer is not used for drinking water and goes straight to sea.</li> </ul>
Phil James	111	Oppose	Delay implementation until there is an economically viable means of implementation.	<ul style="list-style-type: none"> <li>On site scientific studies haven't been done.</li> <li>Not feasible for majority of farmers.</li> </ul>
Sarah Cooper	112	Amend	Delay implementation.	<ul style="list-style-type: none"> <li>Allow time for region/area specific research to take place.</li> </ul>
Fiona Rudduck	113	Amend	Delay implementation.	<ul style="list-style-type: none"> <li>Allow time for better research into environmental, economic and social impact.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 113 ref. 100</i>		<ul style="list-style-type: none"> <li><i>Measures not realistic and don't account for differing regions and systems.</i></li> <li><i>Farmers may breach limits despite taking precautions.</i></li> </ul>
Stewart Morrison	116	Amend	More time for research to be carried out on how limits will affect farming and on whether the proposed limits are set correctly.	<ul style="list-style-type: none"> <li>All-Otago limit doesn't take into account differences between regions and farming systems.</li> <li>Time hasn't been taken to test or peer-review model.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 116 ref. 100</i>		<ul style="list-style-type: none"> <li><i>Limits not realistic or achievable.</i></li> <li><i>Despite taking precautions farmers may breach limits.</i></li> <li><i>Not appropriate to refer to specific version of Overseer.</i></li> <li><i>Inconsistent with RMA Part II and s107.</i></li> <li><i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Bob Hollamby	117	Amend	<p>Recognise the Waitaki Plains as a special designated area.</p> <p>Allow calculated nitrogen leaching to be greater than the proposed 30kg limit.</p>	<ul style="list-style-type: none"> <li>Nitrogen leaching limits not achievable due to border dyke irrigation.</li> <li>Stocking rate would need to reduce by almost 40%, making farms uneconomic.</li> <li>Design of Lower Waitaki Irrigation Scheme means conversion to spray not</li> </ul>

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				simple, requires more energy and will destroy biodiversity. <ul style="list-style-type: none"> <li>Groundwater nitrate level half maximum drinking water standard despite intensive dairy activity; diluted by irrigation.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 117 ref. 100</i>		<ul style="list-style-type: none"> <li>Limits cannot always be achieved.</li> <li>Would reduce stock numbers, restrict production and harm community without science or environmental benefit.</li> </ul>
PGG Wrightson	119	Amend	Nutrient and E coli runoff levels should be set across the board at 30 kgN/ha.	<ul style="list-style-type: none"> <li>Allows good farmers to continue to operate and achieve good water quality.</li> <li>Need good practices but a level below 30 kgN/ha is unachievable.</li> <li>Dairy industry should be well monitored and controlled, not ruined by unachievable laws.</li> </ul>
A J & A J Anderson	120	Amend	30 kgs be changed to 45 kgN/ha/yr elsewhere in Otago.  Allow some margin for error until nitrogen leaching can be accurately assessed.	<ul style="list-style-type: none"> <li>No reliable way to accurately measure N leaching.</li> <li>Told border dyke irrigation can't comply with this rule.</li> <li>Changing irrigation system would be expensive, infrastructure wouldn't cope, and mean removing recently planted trees and shelter belts; for little gain in water quality.</li> <li>N leached is more diluted with flood irrigation.</li> <li>Decisions need to be measured, realistic and implemented over a period of time. Financial losses must be considered.</li> </ul>
Isbister Farms Limited	123	Amend	A single nitrogen loading target of 30 kg/ha be adopted for the greater Kakanui catchment.	<ul style="list-style-type: none"> <li>10kg N loading limit unrealistic - would make my farming system untenable, reduce production value.</li> <li>Contrary to RMA and ORC objectives to set limits in a sustainable way.</li> <li>Based on a model not yet tested and peer-reviewed.</li> <li>Aquifer has nutrient contribution from the entire catchment: two N levels disadvantage those in sensitive areas.</li> <li>Assess results of the actions farmers have already taken before setting targets that might be too aggressive/ unnecessary.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 123 ref. 100</i>		<ul style="list-style-type: none"> <li>Limits not realistic or achievable.</li> <li>Despite taking precautions farmers may breach limits.</li> <li>Not appropriate to refer to specific version of Overseer.</li> <li>Inconsistent with RMA Part II and s107.</li> <li>Will put farmers out of business.</li> <li>Objectives and policies don't support prohibited activity status.</li> </ul>
Jane Young	124	Amend	Suggest incremental introduction of limits and a shorter overall time frame.  Remove reference to specific software.	<ul style="list-style-type: none"> <li>Records of management practices should be compulsory so ORC has database for decision-making.</li> <li>Lead-in times too long.</li> <li>Overseer Version 6 likely to be out of date by 2019.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 124 ref. 100</i>		<ul style="list-style-type: none"> <li>Schedule 16 does not take into account local environmental conditions and economic/development consideration.</li> <li>Schedule 16 is disproportionate and overly restrictive.</li> <li>Does not allow for greater flexibility (particularly in relation to timeframes) to ensure that disproportionate costs are not imposed on existing farming operations.</li> </ul>
Finlay Family Trust	125	Amend	Delete 10 & 30 kg/ha nitrogen.	<ul style="list-style-type: none"> <li>Uncertain, measurement difficult.</li> <li>Even if possible to measure, N loading limits unrealistic.</li> <li>Contrary to RMA and ORC objectives to set limits in sustainable way.</li> <li>Based on a model not yet tested and peer-reviewed.</li> <li>Ignore the different regions and farming systems.</li> <li>Not enough time has been given for researched submission and a truly consultative basis.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 125</i>		<ul style="list-style-type: none"> <li>Measures not realistic and don't account for differing regions and systems.</li> <li>Farmers may breach limits despite taking precautions.</li> </ul>

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		<i>ref. 100</i>		
Mt Aspiring Station	127	Oppose	Delete the proposed 10 kgN/ha/year limit for Nitrogen Sensitive Zones until more research is done and more time is allowed to discuss realistic and feasible limits.	<ul style="list-style-type: none"> <li>On property, with zero nitrogen fertiliser additions and a conservative stocking rate, the limit is breached.</li> <li>Limit has not been verified through the Overseer program.</li> <li>Limits do not come into effect until March 2019 which gives plenty of time to do further investigation.</li> <li>Even with 7 year transition which gives time to undertake research, wrong to set limits initially that are not substantiated and could prove inaccurate.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 127 ref. 100</i>		<ul style="list-style-type: none"> <li>Limits not realistic or achievable.</li> <li>Despite taking precautions farmers may breach limits.</li> <li>Not appropriate to refer to specific version of Overseer.</li> <li>Inconsistent with RMA Part II and s107.</li> </ul>
Grant Bradfield	131	Amend	Clarification is needed as to whether this applies only to the application of nitrogen, fertiliser and effluent.	<ul style="list-style-type: none"> <li>If it applies to urine leaching there is little a farmer can do but destock.</li> <li>Overseer not a suitable tool to be used in legal cases as accuracy is +/- 30%.</li> <li>Is this rule necessary when NNN covered by Schedule 16.</li> </ul>
Andrew Jackson	132	Amend	Make the 30 kgs of N cover all the farm.	<ul style="list-style-type: none"> <li>Still need to winter stock.</li> </ul>
The Cow Farm Limited	133	Oppose	Withdraw Rule 12.C.1.3 and the associated maps until clear robust science can justify its inclusion.	<ul style="list-style-type: none"> <li>Overseer version 6 not currently available.</li> <li>Other software may be equally useful. Rule should refer to system outcome rather than specifying a particular one.</li> <li>Requirement for sensitive areas to meet 10 kg/ha not realistic or achievable.</li> <li>No clear evidence or science in S32 Report to supports the 10 kg/ha figure for nitrogen sensitive areas.</li> <li>The application of a more stringent 10 kg/ha requirement where there is no issue with water quality, while areas of concern (South West Otago and Dunedin) are not subject to this requirement, is not fair or just.</li> <li>Generic figure doesn't take into account soil type, pasture development, climate or on-farm management.</li> <li>Adjacent properties could be subject to very different requirements, without any direct scientific evidence to support the application rates.</li> <li>Economic implications for nitrogen sensitive areas include economic unviability, lower property values and lower economic activity.</li> <li>All rural land users could potentially require consent to apply fertiliser. Practical implications of this have not been made clear. Potentially significant compliance issues with rural-based industry.</li> <li>The requirement for the majority of farmers to get consent onerous and unfair - science does not exist to justify this approach.</li> <li>Rule does not indicate whether the application rates apply on a per hectare basis, on a per hectare across one property basis, or a per hectare across a specific catchment basis.</li> </ul>
<i>Teviotdowns Ltd</i>	<i>1001</i>	<i>Support submission 133 ref. 100</i>		<ul style="list-style-type: none"> <li>Has an effluent discharge permit and works very hard to achieve 8kg N loss/ha/year.</li> <li>10 kg N and 30 kg N are arbitrary and should be system specific.</li> <li>Rule 12.C.1.3 should be withdrawn until robust science can justify its inclusion.</li> </ul>
<i>Pypers Produce Ltd</i>	<i>1023</i>	<i>Support submission 133 ref. 100</i>		<ul style="list-style-type: none"> <li>OVERSEER calculation for nitrate leaching is not accurate enough. Results can be altered by climate conditions.</li> <li>More scientific way needed to produce accurate reading of historical data.</li> <li>10kg/ha not economically sustainable.</li> </ul>
<i>Otago Water Resource Users Group</i>	<i>1056</i>	<i>Support in part submission 133 ref. 100</i>		<i>The rule should provide flexibility to accommodate alternative monitoring systems.</i>

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<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 100</i>		<ul style="list-style-type: none"> <li>• Limits not realistic or achievable. Science doesn't justify stringent measures.</li> <li>• Lack of fairness as to differing catchment and farm types.</li> <li>• Reliance upon Overseer inappropriate given limitations and availability issues.</li> <li>• Result could be economic unviability.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 133 ref. 100</i>		<ul style="list-style-type: none"> <li>• Support withdrawal of rule until clean robust science can justify its inclusion and the economic effects as per the S32 can be shown.</li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 133 ref. 100</i>		<ul style="list-style-type: none"> <li>• Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</li> </ul>
Foxhaven Farms Ltd	135	Oppose	<p>That Rule 12.C.1.3 is deleted and that the per hectare limits on nitrogen be removed from the plan.</p> <p>That the use of Overseer as a monitoring/measurement/compliance tool is removed from the plan.</p>	<ul style="list-style-type: none"> <li>• Doubts the science behind the margins and limits.</li> <li>• May have to destock despite investment in efficient spray irrigation and become unviable.</li> <li>• Appreciate the need to manage N appropriately; we take steps to reduce potential nutrient loss.</li> <li>• Serious concerns with the use of OVERSEER to model N loss from property and/or using it for any compliance.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 135 ref. 100</i>		<ul style="list-style-type: none"> <li>• Limits not realistic or achievable. Science doesn't justify stringent measures.</li> <li>• Lack of fairness as to differing catchment and farm types.</li> <li>• Reliance upon Overseer inappropriate given limitations and availability issues.</li> <li>• Result could be economic unviability.</li> </ul>
Otago Conservation Board	140	Amend	Withdraw Plan Change 6A; or amend the provisions in Rule 12.C.1.3 to clarify whether resource consent is required if the nitrogen tests are failed, or if what is proposed is prohibited.	<ul style="list-style-type: none"> <li>• The proposed change could lead to the deterioration of water quality in Otago.</li> <li>• If discretionary consent is required, the rules should clearly state the matters to which the Council will restrict its discretion.</li> <li>• Rules should clarify whether the proposal is prohibited or consent is required.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support in part submission 140 ref. 100</i>		<ul style="list-style-type: none"> <li>• Support in part if the Council clarifies the concerns raised by the submitter.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 140 ref. 100</i>		<ul style="list-style-type: none"> <li>• Supports withdrawal of the plan.</li> <li>• Agree plan provisions are unclear and complex.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			

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<i>Central Otago Wine Growers Association</i>	1054			
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 140 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Support a reduction in the discharge or contaminants and nutrients directly or indirectly to water.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 140 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 16 does not take into account local environmental conditions and economic/development consideration.</i></li> <li>• <i>Schedule 16 is disproportionate and overly restrictive.</i></li> </ul>
Eloise Neeley	141	Amend	Would like to see a longer lead in time for the requirements to keep Overseer records and more work done on the expected impacts to the region, both in water quality and economic.	<ul style="list-style-type: none"> <li>• Enforcement of this rule is a blunt instrument to effect change.</li> <li>• Longer transition times with education and collaboration would get better result.</li> <li>• Overseer not used by all farmers so in order to know if compliant have to use this programme. Version 6 still in development stage.</li> <li>• Even with best practice some farmers will fail to meet requirements leading to fear and suspicion, not the intent of the plan change.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 141 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Reliance upon Overseer inappropriate given limitations and availability issues.</i></li> <li>• <i>Result could be economic unviability.</i></li> </ul>
M L & P J Lord Family Trust	143	Oppose	<p>Review limits in terms of whether they are achievable and make full assessment against the economic impacts of the limits.</p> <p>Assess the impacts of the limits on farmers and whether or not the limits need to be applied across all parts of Otago.</p> <p>Increase the limits, particularly in the sensitive zones and in parts of Otago where the combination of soil types and irrigation systems causes 30 kg Nitrate/ha/yr to be unachievable.</p>	<ul style="list-style-type: none"> <li>• 2 standards for whole of Otago is too simplistic.</li> <li>• Changes required to meet the limits through irrigation conversion or destocking could result in loss of jobs and viability of farming operations especially farmers in a sensitive zone.</li> <li>• Larger question of water quality has not been put side by side with the cost of implementing proposed standards.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 143 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Practical alternatives &amp; more workable rules offered.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 143 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
W L Hamilton	144	Amend	<p>12.C.1.3 (i) should state "latest version of Overseer".</p> <p>12.C.1.3 (i)(b) should state "40kg nitrogen/ha/yr".</p>	<ul style="list-style-type: none"> <li>• Overseer is in development.</li> <li>• Allows more intensification and production in relatively safe areas.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 144 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Will put farmers out of business.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
New Zealand Pork Industry Board	145	Amend	<p>Remove reference to 'Version 6' from the rule.</p> <p>Retain the reference to 31st March 2019.</p> <p>Add the following to Rule 12.C.1.3:</p>	<ul style="list-style-type: none"> <li>• OVERSEER regularly updated, will be superseded by 2019.</li> <li>• Retaining 31 March 2019 provides a transition phase.</li> <li>• Number of land uses currently can't use OVERSEER or have a significant degree of uncertainty surrounding nutrient budgets produced (e.g. Outdoor pig production, discharge of solid manure or litter to land) which impacts on the</li> </ul>

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			iii) Activities which cannot be modelled by Overseer will have an exemption from points (i) and (ii) of this rule. a) Once a new activity is included into Overseer the activity will be provided with a 7 year transition phase before having to meet the requirements of (i) (a) and (b).	ability to know if systems are compliant.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 145 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Reliance upon Overseer inappropriate given limitations and availability issues.</i></li> <li>• <i>Limits and timeframes need to be higher.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 145 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Support further direction on land uses that cannot be modelled using Overseer.</i></li> <li>• <i>Extending the timeframe for compliance with the nitrogen limits beyond 2019 is not supported.</i></li> </ul>
Dairy NZ Limited	146	Oppose	Withdraw Rule 12.C.1.3 and the associated Maps I1 - I6.  ORC should initiate a collaborative process with a broad range of stakeholders to develop a rule that is more technically robust and has broad community support.	<ul style="list-style-type: none"> <li>• Permitted activity maximum nitrogen leaching rate rule based on Overseer is appropriate but current rule too deficient.</li> <li>• Inappropriate discretion by ORC to determine compliance.</li> <li>• Using one model version which is not operational is uncertain and inappropriate.</li> <li>• Would version 6 be available when model updated.</li> <li>• Insufficient analysis on proposed zone boundaries.</li> <li>• More technical assessments needed for appropriate thresholds.</li> <li>• Need to specify loading limit based on receiving water quality.</li> <li>• Need a qualified person to undertake Overseer.</li> <li>• Need clarification on limits applying as whole property average.</li> <li>• No clear framework for resource consents.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 146 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change process provides for the "working through" of these matters.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Reliance upon Overseer inappropriate given limitations and availability issues.</i></li> <li>• <i>Limits need to be higher.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 146 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>The deletion of the thresholds for the leaching of nitrogen from land to groundwater is opposed.</i></li> <li>• <i>A requirement for the landowner/manager to engage a suitably qualified person to undertake Overseer modelling and provide certification is supported.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support submission 146 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Rule not technically robust. Inappropriate discretion retained by ORC.</i></li> <li>• <i>Insufficient analysis of impacts undertaken.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Need for provision in the transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge standards.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i></li> </ul>
Trust for the estate of W J Johnston	152	Amend	A nutrient loading level target of 30 - 40 kg/ha to be adopted for the entire Kakanui and Kauru catchment area.	<ul style="list-style-type: none"> <li>• 10 kg/ha unrealistic, based on untested model.</li> <li>• 10 kg/ha doesn't account for differences in regions and farming, creates winners and losers.</li> <li>• Little time allowed to make a researched, consultative based submission on</li> </ul>



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				<p>the figures.</p> <ul style="list-style-type: none"> <li>• 10 kg/ha is contrary to RMA and ORC objectives, to set limits in sustainable way.</li> <li>• 10 kg/ha will limit future farming options and negatively affect land values.</li> <li>• The 2 nitrogen loading levels disadvantage land users in the sensitive area, unreasonable and unnecessary as entire catchment contributes to nutrients in the Kakanui-Kauru aquifer.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 152 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Result could be economic unviability.</i></li> </ul>
Shalloch Farms Ltd	154	Amend	Change the limit in (i) from 30kgN/Ha per year elsewhere in Otago and include different limits more specific to specific regions or aquifers.	<ul style="list-style-type: none"> <li>• 30kgN/Ha limit should not be Otago wide.</li> <li>• Should be different limits more specific to specific regions or aquifers.</li> <li>• Dairy farm on Waitaki Plains extensively rebordyked, use all best management practices still would not meet 30kg limit.</li> <li>• Overseer does not calculate different irrigation efficiencies of border dykes.</li> <li>• Cost of converting to spray \$1-1.5 million, with loss of wetlands and shelter trees.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 154 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Result could be economic unviability.</i></li> </ul>
Corona Farms Ltd	155	Amend	Feel more work needs to be done on what well run modern border dyke systems can achieve.	<ul style="list-style-type: none"> <li>• Won't be able to continue to use border dykes.</li> <li>• Annual rebordering 5-10% of farm, considerable expense, use less water therefore less runoff.</li> <li>• Not enough time to plan for long-term expenditure.</li> <li>• Efficient modern borders a better solution than electricity-consuming pivots.</li> </ul>
Andrew & Barbara Richardson	156	Amend	<p>Improvement in the science behind the decision-making. Collection of more current and historical data on groundwater nitrate levels).</p> <p>A sliding scale of leaching allowed over time to give more time for change.</p>	<ul style="list-style-type: none"> <li>• Support prevention of increasing nitrogen in groundwater.</li> <li>• Disappointed with standard of science used to back decisions.</li> <li>• Stronger reliance on factual information needed and less reliance on modelling.</li> <li>• More data should be collected in the future to monitor change in groundwater nitrate.</li> <li>• 30 kg/N will be a challenge for some lower Waitaki Plains farms and will involve a significant cost to convert from border dyke to spray irrigation.</li> </ul>
Gerard Booth	159	Oppose	Needs more scientific research and economic analysis.	<ul style="list-style-type: none"> <li>• More analysis needed.</li> </ul>
Sam Kane	161	Amend	Adopt a blanket discharge limit of 50kg N/Ha/year until there is sufficient science to support lowering the limit.	<ul style="list-style-type: none"> <li>• Proposed limits arbitrary.</li> <li>• Practicality of using Overseer questionable.</li> </ul>
Matuanui Ltd	163	Amend	<p>Clarify the following:</p> <ul style="list-style-type: none"> <li>- What is a discharge of nitrogen from land to groundwater i.e. Does this only apply to fertiliser and effluent applications over a shallow aquifer?</li> <li>- Why Overseer is being used to control discharges to groundwater when it is designed to calculate losses below the root zone?</li> <li>- How Overseer is to be applied e.g. whole farm vs. block vs. paddock.</li> <li>- The relationship between 12.C.0.2 and 12.C.0.3 - if I meet Overseer, but actual sample breaches the Schedule 16 limits, what happens?</li> </ul> <p>Provide evidence that 10 &amp; 30 are justified and achievable.</p> <p>Clarify.</p>	<ul style="list-style-type: none"> <li>• Some aquifers mapped, but in some cases groundwater very deep and fertiliser not getting there.</li> <li>• Rule appears to apply to all farming including wintering even though I don't apply nitrogen or effluent.</li> <li>• Queries if a cost/benefit analysis has been undertaken to determine how much change is needed, and if it is achievable.</li> <li>• Limits could ban some farming practices such as wintering, conversion, intensification or border-dyking.</li> </ul>

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<i>Federated Farmers of New Zealand</i>	1057	Support submission 163 ref. 100		<ul style="list-style-type: none"> <li>• Rule uncertain and confusing for users.</li> <li>• Limits not realistic or achievable. Science doesn't justify stringent measures.</li> <li>• Lack of fairness as to differing catchment and farm types.</li> <li>• Result could be economic unviability.</li> </ul>
Jim Gibson	165	Oppose	No change to the N leaching until good scientific figures can be proved especially for arable cropping.	<ul style="list-style-type: none"> <li>• Need scientific evidence.</li> <li>• Current production should be provided for.</li> <li>• Overseer version 6 not yet available, so uncertainty in what is being proposed.</li> </ul>
Hunter Valley Station Ltd	166	Amend	Re-evaluate decisions on high rainfall properties and the influence this has on them.	<ul style="list-style-type: none"> <li>• Many examples of river deltas and associated problems caused by natural phenomena, that cannot be attributed to offenses associated with farming.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 166 ref. 100		<ul style="list-style-type: none"> <li>• Limits not achievable, science doesn't justify stringent measures.</li> <li>• Lack of fairness as to differing catchment and farm types.</li> <li>• Economically unviable.</li> </ul>
Dawn Dunjey	168	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> <li>• Levels set based on Canterbury study, no onsite scientific studies undertaken.</li> <li>• OVERSEER version 6 currently an unknown model.</li> <li>• Existing farm operations in sensitive areas unable to continue.</li> <li>• Large changes in farm operations required.</li> <li>• No economic effects studies completed.</li> <li>• North Otago Volcanic Aquifer not used for drinking, discharges to sea.</li> <li>• Queries benefit of and time to lower nitrogen levels in this aquifer.</li> </ul>
Ross Hay	173			
Niere Kitson	174			
Logan Sopson	175			
Barry Diedrichs	176			
Quambatook Ltd	182			
Trevor Stanger	183			
Kate Streeter	184			
<i>Federated Farmers of New Zealand</i>	1057	Support submissions 168, 173 – 176 & 182 – 184 ref. 100		<ul style="list-style-type: none"> <li>• Rule uncertain and confusing for users.</li> <li>• Limits not realistic or achievable. Science doesn't justify stringent measures.</li> <li>• Lack of fairness as to differing catchment and farm types.</li> <li>• Economically unviable.</li> <li>• Concern with reference to specific Overseer version.</li> </ul>
Mitchell & Webster Ltd	186	Amend	That this rule be not implemented until further thorough studies and investigation of the consequences of the limits suggested in the plan are evaluated based on science, the environment and the economics of the related regions.	<ul style="list-style-type: none"> <li>• OVERSEER version 6 currently an unknown model.</li> <li>• OVERSEER does not currently work for cropping farmers or market gardeners.</li> <li>• There is a lack of knowledge on the soils overlaying some of the aquifers.</li> <li>• Levels set based on Canterbury study, no onsite scientific studies undertaken.</li> <li>• North Otago Volcanic Aquifer not used for drinking, discharges to sea.</li> <li>• 10 kg N/ha rarely achieved, would require huge changes in farming practices (not minor changes as suggested).</li> <li>• No economic effects studies completed.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 186 ref. 100		<ul style="list-style-type: none"> <li>• Rule uncertain and confusing for users.</li> <li>• Limits not realistic or achievable. Science doesn't justify stringent measures.</li> <li>• Lack of fairness as to differing catchment and farm types.</li> <li>• Economically unviable.</li> </ul>
Bob Kingan	190	Amend	Amend rule 6A seeking an increase in the proposed discharge limits so they are more achievable for farmers.	<ul style="list-style-type: none"> <li>• Have taken a number of water tests on farm.</li> <li>• Limits should be set closer to what we can achieve without compromising production.</li> </ul>
Grant Ludemann	191	Amend	10 kg N/ha on sensitive [zone] be changed to 25 kg, and (b) 30 kg be changed to 40 kg.	<ul style="list-style-type: none"> <li>• Not enough scientific evidence to justify original limits.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 191 ref. 100		<ul style="list-style-type: none"> <li>• Rule uncertain and confusing for users.</li> <li>• Support change in limits. Limits not realistic or achievable. Science doesn't justify stringent measures.</li> <li>• Lack of fairness as to differing catchment and farm types.</li> <li>• Economically unviable.</li> </ul>
Rex & Penny Lowery	193	Amend	Want the policy to be practical and achievable so it's still warrantable to continue farming.	<ul style="list-style-type: none"> <li>• Unwarrantable to a sheep farmer, influenced by the dairy market.</li> <li>• A farmer does not have the time or knowledge to do the required testing.</li> </ul>

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<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 193 ref. 100</i>		<ul style="list-style-type: none"> <li>Doesn't allow for natural variation between catchments or weather events that cause natural turbidity.</li> <li>Concern with workability of timeframes.</li> <li>Needs to be achievable and cost effective.</li> </ul>
Jeremy Wales	194	Oppose	Drop rule.	<ul style="list-style-type: none"> <li>Farmers will only use necessary materials, not waste money.</li> </ul>
Dairy Holdings Limited	195	Amend	<p>Although a permitted activity approach is supported, the rule is opposed.</p> <p>The rule package needs to be amended to accommodate the concerns outlined [in reasons] - including the possible use of a concentration limit.</p> <p>Within the Waitaki area, complying with a total maximum nitrate concentration in groundwater.</p>	<ul style="list-style-type: none"> <li>Border-dykers unable to meet 30 kgN/ha/yr limit, even with best practice and full mitigation.</li> <li>Conversion to spray uneconomic, unclear if groundwater nitrate levels would improve.</li> <li>Unclear in lower Waitaki what environmental issue being addressed.</li> <li>In lower Waitaki complying with a total maximum nitrate groundwater concentration more appropriate, less adverse economic effects.</li> <li>Activity status when discharge limit not met unclear.</li> <li>Unclear how to show compliance with limits, what monitoring requirements needed, inadequate assessment of monitoring practicality and cost.</li> <li>OVERSEER has limitations for irrigated agriculture, reliant on agreed protocols for data entry which should be incorporated into the plan change.</li> <li>No provision for updates of OVERSEER, or use of other suitable models.</li> <li>Unclear role of individuals for data and costs, and ORC data analysis process.</li> <li>Inappropriate discretion given to ORC on compliance.</li> <li>Unclear where limits are to be calculated, total or part of property, zone average.</li> <li>Section 32 report and technical analysis do not justify need for, or implications of, rule.</li> <li>Inappropriate to rely on Canterbury report for plan change, values not suitable at farm scale.</li> </ul>
<i>Lower Waitaki Irrigation Co</i>	1005	<i>Support submission 195 ref. 100</i>		<ul style="list-style-type: none"> <li>Supports material in the submission questioning OVERSEER's suitability.</li> <li>Supports the rationale on high cost of capital incurred in converting border dyke systems to spray irrigation systems.</li> <li>Supports submitter's alternative solution of total maximum nitrate concentration in groundwater.</li> <li>Supports concerns about achievability of 30kg N limit with borderdyke irrigation.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 100</i>		<ul style="list-style-type: none"> <li>Submission outlines concern of further submitter.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 195 ref. 100</i>		<ul style="list-style-type: none"> <li>Rule uncertain and confusing for users.</li> <li>Limits not realistic or achievable. Science doesn't justify stringent measures.</li> <li>Lack of fairness as to differing catchment and farm types.</li> <li>Economically unviable.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 100</i>		<ul style="list-style-type: none"> <li>Support in part, particularly regarding wider effect of the plan change.</li> <li>Although it doesn't request total withdrawal the submission recognises lack of specificity of controls and concern for lack of evidence supporting discharge limits, particularly given reliance on prohibited activity status.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 100</i>		<ul style="list-style-type: none"> <li>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</li> <li>Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	<p>Rule 12.C.1.3 be deleted</p> <p>OR</p>	<ul style="list-style-type: none"> <li>OVERSEER version 6.0 not yet publicly available, cannot determine appropriateness of using this model.</li> <li>(i) lacks clarity, does it apply to calculated nitrogen leaching by landowners or</li> </ul>

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			Rule 12.C.1.3 should be redrafted to link what is occurring on-site to the outcomes sought within groundwater. The redrafted rule should be clear, enforceable and enable people to determine whether they comply with the rule.  AND  That a maximum lead in time of 5 years should be provided.	ORC? • 7 years lead in excessive - 5 years used in other regions. • "Necessary" data not specified.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 197 ref. 100</i>		• Supports clear enforceable rule which people are able to determine if they comply with it.
<i>Horticulture New Zealand</i>	1032	<i>Oppose in part submission 197 ref. 100</i>		• Reduced timeframe is unrealistic for implementation.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose in part submission 197 ref. 100</i>		• Opposes deletion of the rule. • Opposes the five-year transitional timeframe and supports the 31/03/2019 trigger date to allow necessary changes in land management practices.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 197 ref. 100</i>		• Agree with clarity and enforceability concerns. Confusion for plan users as to how to comply and with reference to specific Overseer model. • Strongly oppose suggested reduction in transition times.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 100</i>		• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 100</i>		• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Hopefield Investments Ltd (R Griffiths)	200	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame to permit of 1 above.	• Costs associated with compliance. • Proposed time frames insufficient. • Unknown implementation management of changes by ORC.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 200 ref. 100</i>		• Concerns with implications of plan change on farming and flow-on effects to region. • Lack of scientific basis for limits and decisions. • Lack of clarity around implementation and achievability of standards and limits.
Irrigation New Zealand Incorporated	202	Oppose	Delete. A process needs to be established whereby ORC facilitates groupings of community stakeholders to set freshwater objectives (using social, economic, environmental and cultural value judgements) and then interpret these to provide corresponding limits.	• Catchment specific limits relevant, better community buy in for achieving. • Concerns with achievability and implications of crude "region wide" limits. • Some catchments have no current environmental issues. • Recommend Overseer version not stated. • Overseer 6 has limitations for irrigated agriculture. • Urgent need to develop Overseer for irrigated environments, encourage ORC to join this process.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 202 ref. 100</i>		• Supports collaborative approach and consideration of all values.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 202 ref. 100</i>		• Rule uncertain and confusing for users. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types. • Economically unviable.
<i>Glenshee Station Limited</i>	1062	<i>Support in part</i>		• Although it doesn't request total plan change withdrawal it recognises the

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		<i>submission 202 ref. 100</i>		<i>vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</i>
Lakes Landcare	210	Amend	Modify/change.	<ul style="list-style-type: none"> <li>• 10 kgN/ha is too stringent; 30 more flexible without adverse effects.</li> </ul>
T A Whiteside & Co Ltd	212	Amend	Delete proposed generic limits on Nitrogen loss to Groundwater, retain permitted activity status, work over longer time frames to introduce limits that provide for losses from different land use types, appropriate to what would occur under adopted best practice.	<ul style="list-style-type: none"> <li>• Concerned proposed changes could influence management practices.</li> <li>• Restrict amount of nitrogen we use.</li> <li>• Affect potential yields and financial viability.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 212 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Concerns with rule workability.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> </ul>
Willowview Pastures Ltd	214	Oppose	The model should reflect a fair cross section of stakeholders, both ORC and farmers. It cannot be drawn up by environmental extremists.	<ul style="list-style-type: none"> <li>• Farmers income and business directly affected.</li> <li>• Proposed nitrogen limits unrealistic, do not allow for different regions and farming systems in Otago.</li> <li>• OVERSEER 6.0 is yet to be tested/peer reviewed within Otago.</li> <li>• Concern Council will control the type of farming they see fit.</li> <li>• Limits make farming unsustainable (contrary to RMA and ORC objectives).</li> <li>• Nitrogen loading limits first notified on 31 March 2012.</li> <li>• Little time to research submission.</li> <li>• Not based on true consultation.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 214 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
Alan Grant Macgregor	215	Oppose	Total review of rule and deletion until further research available.	<ul style="list-style-type: none"> <li>• Limits unrealistic and model not tested/peer reviewed.</li> <li>• Limits unjustifiable and lack research support.</li> <li>• No consideration of farming types and management systems.</li> <li>• Many areas will be untenable for farming.</li> <li>• Contrary to RMA and ORC objectives.</li> <li>• Poor approach to formation of the proposed plan with minimal consultation.</li> <li>• Minimal time given to make informed and researched submission.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 215 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions/systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
Graham Butler	216	Amend	The ORC needs to recognise that the Waitaki plains should be a special, designated area and within the area there should be provision made for different soil types to allow the calculation of nitrogen being leached to be greater than the proposed 30kg limit per year. It needs to be looked at on a case by case basis depending on soil type and farming type. The ORC needs to do more specific monitoring of the Waitaki plains to gain a better understanding of leaching levels in the lighter soils compared to the heavier soils.	<ul style="list-style-type: none"> <li>• Not possible to submit on levels as OVERSEER 6.0 not available.</li> <li>• Compliance requires change from border dyke to spray irrigation (high economic cost).</li> <li>• Water quality static and at half drinking water level.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 216 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions/systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
Waverley Downs Ltd	220	Amend	Retain permitted activity status. Amend N limits to ensure that N loss limits are achievable under different land use scenarios. Introduce differentiated N loss limits for shoulders of spring/autumn and winter where flows are high and water temperature will limit any effects of loss. Increase limits in sensitive zones to make these more achievable.	<ul style="list-style-type: none"> <li>• Application timings of nitrogen are critical to achieve good yields.</li> <li>• Heavy rainfall could compromise our position.</li> <li>• Any reduction in yields/gross margin will impact on business.</li> <li>• Insufficient evidence showing direct relationship between N discharges and application under good practice.</li> <li>• Mole and tile drains raise concerns about achievability of limits.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Increase and stagger phase in times for achieving limits. Ensure that the use of modelling is accurate enough to predict per hectare losses under different land use scenarios including cropping.	
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 220 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions and systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Limits need greater scientific justification.</i></li> </ul>
Preserve Our Water Society Inc	225	Amend	This rule needs to be revised.	<ul style="list-style-type: none"> <li>• Can't protect groundwater by relying on Overseer.</li> <li>• ORC already uses Overseer during consenting but water quality is still deteriorating.</li> <li>• In ground monitoring is needed to pick up issues before nitrates affect groundwater.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 225 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Does not give flexibility to existing farming operations.</i></li> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
John Newlands Farming Company	228	Amend	Amend to ensure nitrogen loading levels are sustainable and realistic for all affected parties.  More time to allow for further research to support this submission.	<ul style="list-style-type: none"> <li>• Overseer has yet to be tested within Otago.</li> <li>• Nitrogen loading limits unrealistic.</li> <li>• Limits don't account for different parts of region and farming systems.</li> <li>• Proposed limits will make my farming system untenable and is contrary to RMA and ORC objectives.</li> <li>• Current water quality is excellent with current farming methods.</li> <li>• Need a more accurate measurement tool than Overseer.</li> <li>• Notification and submission period didn't allow time to research and consult on impacts of rule 12.C.1.3.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 228 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions/systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Without change could put landowners out of business.</i></li> </ul>
Kawarau Station Limited	232	Oppose	Withdraw rule 12.C.1.3.	<ul style="list-style-type: none"> <li>• Use of Overseer not proven to be most effective tool.</li> <li>• Specific problems on irrigated land.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 232 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Rule uncertain and confusing for users.</i></li> <li>• <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Economically unviable.</i></li> </ul>
Michael O'Connor	234	Oppose	Increase kilograms nitrogen per ha on different types of land where necessary.	<ul style="list-style-type: none"> <li>• One figure for all land types does not work.</li> <li>• Border dyke land will become uneconomic for dairying/cropping.</li> <li>• Border dyking has low carbon footprint compared to alternative.</li> <li>• Will result in mass denuding of Waitaki Plains, causing wind evaporation/erosion, depletion of bird life, and poor existence for farm animals and people.</li> <li>• If N figures stay same, farms will have to destock.</li> <li>• Rule does not promote ORC mission statement "To promote the sustainable development and enhancement of Otago resources".</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 234 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Rule uncertain and confusing for users.</i></li> <li>• <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Economically unviable.</i></li> </ul>
Dulce-Domum Trust	235	Amend	[Should say] 30 kg of Nitrogen per hectare per year, in line with other areas of Otago, as opposed to the proposed 10 kg per ha.	<ul style="list-style-type: none"> <li>• Property over Shag River Alluvium Aquifer.</li> <li>• 10 kg limit does not take into account ongoing fertiliser improvements e.g. Eco-N, and it curtails future development.</li> <li>• Development of plant species with more efficient N uptake.</li> </ul>
<i>Federated Farmers of New</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> <li>• <i>Rule uncertain and confusing for users.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 235 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Economically unviable.</i></li> </ul>
David Blair	237	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> <li>• Consider carrying capacity for sensitive areas.</li> <li>• Consider destocking non-performing farmers.</li> <li>• Consider effect of abstraction on concentrating pollutants.</li> </ul>
Forest Range Ltd	240	Amend	Amend rule to give flexibility with monitoring and assessing penalties for farms in this situation.	<ul style="list-style-type: none"> <li>• Impact unfairly farmers with extensive farms.</li> <li>• N fertiliser applied every 3 years at large applications, may have short term effect.</li> <li>• If farmers unable to maintain fertility, erosion of property rights.</li> <li>• Decrease incomes, negative effect of erosion.</li> </ul>
Fonterra Co-operative Group Limited	241	Oppose	Withdraw Rule 12.C.1.3 and the associated Maps I1 - I6.  ORC should initiate a collaborative process with a broad range of stakeholders to develop a rule that is more technically robust and has broad community support.	<ul style="list-style-type: none"> <li>• Permitted activity maximum nitrogen leaching rate rule based on Overseer is appropriate but current rule too deficient.</li> <li>• Inappropriate discretion by ORC to determine compliance.</li> <li>• Using one model version which is not operational is uncertain and inappropriate.</li> <li>• Would version 6 be available when model updated.</li> <li>• Insufficient analysis on proposed zone boundaries.</li> <li>• More technical assessments needed for appropriate thresholds.</li> <li>• Need to specify loading limit based on receiving water quality.</li> <li>• Need a qualified person to undertake Overseer.</li> <li>• Need clarification on limits applying as whole property average.</li> <li>• No clear framework for resource consents.</li> </ul>
<i>Forest and Bird NZ</i>	<i>1007</i>	<i>Oppose submission 241 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Rule sets appropriate thresholds and is needed to maintain and enhance water quality.</i></li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support submission 241 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Supports collaborative approach.</i></li> </ul>
<i>Environmental Defence Society</i>	<i>1055</i>	<i>Oppose submission 241 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Rule sets appropriate thresholds.</i></li> <li>• <i>Rule is needed to maintain and enhance water quality.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 241 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Rule uncertain and confusing for users.</i></li> <li>• <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Economically unviable.</i></li> <li>• <i>Concern with reference to specific Overseer version.</i></li> </ul>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 241 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose submission 241 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>The deletion of the thresholds for the leaching of nitrogen from land to groundwater is opposed. A requirement for the land owner / manager to engage a suitably qualified person to undertake Overseer modelling and provide certification is supported.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support submission 241 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
Rod Philip	242	Amend	I seek the level raised to 40 kgs/ha/yr.	<ul style="list-style-type: none"> <li>• 10 kgs/ha/yr is not a reasonable level.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 242 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Richard Plunket	245	Oppose	Would like to see the ORC wait for OVERSEER version 6 to be released before determining where the leaching level for nitrogen be set at, as the nitrogen leaching may alter dramatically under version 6.	<ul style="list-style-type: none"> <li>• Uncertainty of using version 6 as hasn't been released so can't determine leaching at present.</li> <li>• Waitaki will struggle to meet limits but can't be certain until version 6 is available.</li> <li>• There may be financial and operational implications if can't meet the limits.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 245 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Viewmont Limited	247	Oppose	Review of rule.	<ul style="list-style-type: none"> <li>• Limits unrealistic and based on a model which is yet to be tested / peer reviewed.</li> <li>• No consideration given to varying farming types and land management system.</li> <li>• Will make farming untenable which conflicts with RMA and ORC objectives.</li> <li>• Limits are unjustifiable with lack of research to support.</li> <li>• Inadequate consultation undertaken and time given to make an informed submission.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 247 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Amend	<p>Seeks the retention of the permitted activity status for the discharge of nitrogen to groundwater, [but] opposes a number of matters and wishes to see consequential changes as required to meet the other significant concerns raised above.</p> <p>Seeks clarification of the activity status for a discharge of nitrogen from land to groundwater should it not comply with Rule 12.C.1.3, and would seek such an activity be restricted discretionary.</p> <p>Seeks the opportunity to work with Otago Regional Council to resolve the consequential changes required.</p>	<ul style="list-style-type: none"> <li>• 'One size fits all' approach inappropriate.</li> <li>• Not convinced limits supported by relevant and robust science.</li> <li>• 10kg limit appears unachievable by a range of activities.</li> <li>• Not clear what activity status will be for activities that don't achieve limits.</li> <li>• Practicality of demonstrating compliance with limits needs to be questioned. It is not clear what is required.</li> <li>• It is not appropriate to identify a particular version of Overseer in provisions. By 2019 Overseer 6 may have been superseded and may not be appropriate to use anymore.</li> <li>• Rule does not stipulate ORC staff will be certified in use of OVERSEER. Risk of uncertainty</li> <li>• If consents aren't to be granted then need an approach that safeguards the equity of existing user's investments in existing farm systems.</li> <li>• Inadequate Section 32. Does not evaluate potential impact of farm systems, costs of operation and productivity potential. Indicates unbalanced Section 32 has been undertaken.</li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support in part submission 248 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Supports submitter's concerns regarding OVERSEER.</i></li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 248 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Imposed limits should be supported by science and technical data.</i></li> <li>• <i>Rules need to be clear and unambiguous.</i></li> <li>• <i>Section 32 assessment is inadequate.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			



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<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	Support submission 248 ref. 100		<ul style="list-style-type: none"> <li>• <i>Despite precautions without change standards won't be achieved.</i></li> <li>• <i>One size fits all not appropriate.</i></li> <li>• <i>Limits don't appear to be based on relevant and robust science.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	Support submission 248 ref. 100		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
Waihem Water Catchment Society Inc	250	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Proposed rates are too low to be practical.</li> <li>• Blanket coverage of region is not possible.</li> <li>• Insufficient time allowed for researching these planned changes and proposals.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 250 ref. 100		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc	252	Amend	<p>Seeks the retention of the permitted activity status for the discharge of nitrogen to groundwater, [but] opposes a number of matters and wishes to see consequential changes as required to meet the other significant concerns raised above.</p> <p>Seeks clarification of the activity status for a discharge of nitrogen from land to groundwater should it not comply with Rule 12.C.1.3, and would seek such an activity be restricted discretionary.</p> <p>Seeks the opportunity to work with Otago Regional Council to resolve the consequential changes required.</p>	<ul style="list-style-type: none"> <li>• 'One size fits all' approach inappropriate.</li> <li>• Not convinced limits supported by relevant and robust science.</li> <li>• 10kg limit appears unachievable by a range of activities.</li> <li>• Not clear what activity status will be for activities that don't achieve limits.</li> <li>• Practicality of demonstrating compliance with limits needs to be questioned. It is not clear what is required.</li> <li>• It is not appropriate to identify a particular version of Overseer in provisions. By 2019 Overseer 6 may have been superseded and may not be appropriate to use anymore.</li> <li>• Rule does not stipulate ORC staff will be certified in use of OVERSEER. Risk of uncertainty</li> <li>• If consents aren't to be granted then need an approach that safeguards the equity of existing user's investments in existing farm systems.</li> <li>• Inadequate Section 32. Does not evaluate potential impact of farm systems, costs of operation and productivity potential. Indicates unbalanced Section 32 has been undertaken.</li> </ul>
<i>Mr RJ Borst</i>	1034	Support submission 252 ref. 100		<ul style="list-style-type: none"> <li>• <i>Section 32 assessment is inadequate.</i></li> <li>• <i>Imposed limits should be supported by science and technical data.</i></li> <li>• <i>Rules need to be clear and unambiguous.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			

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<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
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<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	Support submission 252 ref. 100		<ul style="list-style-type: none"> <li>• <i>Despite precautions without change standards won't be achieved.</i></li> <li>• <i>One size fits all not appropriate.</i></li> <li>• <i>Limits don't appear to be based on relevant and robust science.</i></li> </ul>
Queenstown Lakes District Council	255	Amend	Amend the provisions to clarify whether resource consent is required if the nitrogen tests in Rule 12.C.1.3 are failed or if what is proposed is prohibited. If discretionary consent is required, it should clearly be stated what matters for discretion would be.	<ul style="list-style-type: none"> <li>• Clarification.</li> </ul>
<i>Dunedin City Council</i>	1025	Support submission 255 ref. 100		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Clutha District Council</i>	1050	Support in part submission 255 ref. 100		<ul style="list-style-type: none"> <li>• <i>Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects.</i></li> <li>• <i>Further clarity is needed.</i></li> <li>• <i>PC6A should be withdrawn if concerns are not addressed.</i></li> <li>• <i>Too complex for landowners.</i></li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>The NZ Transport Agency</i>	1073	Support submission 255 ref. 100		<ul style="list-style-type: none"> <li>• <i>Recognition Schedules 15 and 16 don't accurately reflect variations between water bodies.</i></li> <li>• <i>Agreed that allowance for appropriate mixing zones should be included.</i></li> <li>• <i>Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</i></li> <li>• <i>Seeks the submission be allowed and the plan change be amended as per the submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 255 ref. 100		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Waitaki Irrigators Collective Limited	257	Amend	<p>Clarification of the activity status of discharges which do not meet the limits provided in the rule.</p> <p>ORC undertake a review of discharge limits and whether these are appropriate/achievable/desirable at the sub-regional level. This could be done through the pilot studies and programmes proposed in the LTP.</p>	<ul style="list-style-type: none"> <li>• <i>Lacks clarity around ability to get resource consent.</i></li> <li>• <i>Limits are not required for all areas.</i></li> <li>• <i>Border-dyke irrigation will unlikely to ever meet limits.</i></li> <li>• <i>Significant costs associated with converting to spray irrigation.</i></li> <li>• <i>Spray irrigation could lead to higher stocking rates and higher nutrient levels.</i></li> <li>• <i>Loss of recharge to aquifers from change in irrigation practice.</i></li> <li>• <i>All consequences of this rule need consideration.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Amend wording from "OVERSEER version 6.0" to " the latest publically available version of OVERSEER".	<ul style="list-style-type: none"> <li>Version 6 not currently available.</li> <li>OVERSEER will be updated when rule comes into effect.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 257 ref. 100</i>		<ul style="list-style-type: none"> <li>Clarification of activity status needs when limits not met.</li> <li>Limits not realistic or achievable.</li> <li>Despite taking precautions farmers may breach limits.</li> <li>Not appropriate to refer to specific version of Overseer.</li> <li>Inconsistent with RMA Part II and s107.</li> <li>Objectives and policies don't support prohibited activity status.</li> </ul>
B & J Smith	259	Amend	Seek modification of this rule.  Further practical, analytical work is required to be undertaken, not simply generic modelling.	<ul style="list-style-type: none"> <li>Need to have levels that will allow farm productivity as well as minimising detrimental effects - practical, analytical work is required, not simply generic modelling.</li> <li>Best practice scenarios for farmers to follow are essential.</li> <li>Social and economic implications need evaluation - will have an extremely serious detrimental effect on Otago, and even the NZ GDP status.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 259 ref. 100</i>		<ul style="list-style-type: none"> <li>Limits not realistic or achievable.</li> <li>Despite taking precautions farmers may breach limits.</li> <li>Not appropriate to refer to specific version of Overseer.</li> <li>Inconsistent with RMA Part II and s107.</li> <li>Objectives and policies don't support prohibited activity status.</li> </ul>
North Otago Irrigation Company	260	Amend	That the proposed limits are reviewed to ensure they are appropriate for each catchment and based on the actual effects of nitrogen leaching.  Requests the wording of Rule 12.C.1.3 is amended to reflect that the leaching/concentration values specified should be a property average.  That the rule refers to the 'current' version of OVERSEER rather than specifying the version number.	<ul style="list-style-type: none"> <li>OVERSEER version 6 not yet released, people can't make informed decision about the impact of the plan change.</li> <li>OVERSEER is regularly updated, plan change needed to update version number.</li> <li>OVERSEER established for dairy, but in infancy for other farming systems.</li> <li>10 kgN/ha/yr leaching limit very difficult or impossible to meet.</li> <li>High N levels in groundwater only an issue for drinking water - N sensitive zones should be based on actual risk to drinking water.</li> <li>Issues with use of OVERSEER in an irrigated environment (e.g. use of average monthly climate data can result in overestimate of N leaching).</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 260 ref. 100</i>		<ul style="list-style-type: none"> <li>For reasons set out in the original submission.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 260 ref. 100</i>		<ul style="list-style-type: none"> <li>Limits not realistic or achievable.</li> <li>Despite taking precautions farmers may breach limits.</li> <li>Not appropriate to refer to specific version of Overseer.</li> <li>Inconsistent with RMA Part II and s107.</li> <li>Objectives and policies don't support prohibited activity status.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 100</i>		<ul style="list-style-type: none"> <li>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 100</i>		<ul style="list-style-type: none"> <li>Support the NOIC submission in full.</li> </ul>
Bernard Lynch	261	Amend	Increase discharge limit to 50kgN/ha under efficient flood irrigation systems.	<ul style="list-style-type: none"> <li>30 kg N/ha limit will preclude flood irrigation, especially on alluvial soils (which enables high production pastoralism).</li> <li>What are the adverse effects of increasing the discharge limit - in the Waitaki Plains receiving water is large and flows out to sea.</li> </ul>
Ballance Agri-Nutrients Ltd	262	Amend	Seeks the retention of the permitted activity status for the discharge of nitrogen to groundwater, [but] opposes a number of matters and wishes to see consequential changes as required to meet the other	<ul style="list-style-type: none"> <li>'One size fits all' approach inappropriate.</li> <li>Not convinced limits supported by relevant and robust science.</li> <li>10kg limit appears unachievable by a range of activities.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>significant concerns raised above.</p> <p>Seeks clarification of the activity status for a discharge of nitrogen from land to groundwater should it not comply with Rule 12.C.1.3, and would seek such an activity be restricted discretionary.</p> <p>Seeks the opportunity to work with ORC to resolve the consequential changes required.</p>	<ul style="list-style-type: none"> <li>• Not clear what activity status will be for activities that don't achieve limits.</li> <li>• Practicality of demonstrating compliance with limits needs to be questioned. It is not clear what is required.</li> <li>• It is not appropriate to identify a particular version of Overseer in provisions. By 2019 Overseer 6 may have been superseded and may not be appropriate to use anymore.</li> <li>• Rule does not stipulate ORC staff will be certified in use of OVERSEER. Risk of uncertainty</li> <li>• If consents aren't to be granted then need an approach that safeguards the equity of existing user's investments in existing farm systems.</li> <li>• Inadequate Section 32. Does not evaluate potential impact of farm systems, costs of operation and productivity potential. Indicates unbalanced Section 32 has been undertaken.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Section 32 assessment is inadequate.</i></li> <li>• <i>Imposed limits should be supported by Science and technical data.</i></li> <li>• <i>Rules need to be clear and unambiguous.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 262 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Despite precautions without change standards won't be achieved.</i></li> <li>• <i>One size fits all not appropriate.</i></li> <li>• <i>Limits don't appear to be based on relevant and robust science.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 100</i>		
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Amend Rule 12.C.1.3 by inserting after 'OVERSEER Version 6.0' in paragraphs (i) and (ii) the words 'or equivalent software regarded as industry best practice'.	<ul style="list-style-type: none"> <li>• Supports 7 year transition time, and 30kg nitrogen limit is appropriate.</li> <li>• Reliance on one brand of software is overly restrictive.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 263 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Clyde Douglas	266	Amend		

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			limits to allow water quality objectives to be achieved, but without unduly compromising farming operations. From 10 kg/ha/yr on sensitive zone to 20 kg/ha/yr.  That the rule refers to the 'current' version of OVERSEER rather than specifying the version number.	limit in the sensitive zones. • By specifying version, it will be out of date by 2019. • OVERSEER 6.0 isn't released yet, so impossible to make informed decision about impact of PC6A.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 266 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Colin Scurr	268	Amend	Delete rule or rule be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.  Change "Overseer version 6" to the most up to date version currently available.	<ul style="list-style-type: none"> <li>• Testing rather than modelling should determine compliance.</li> <li>• Provides no guidance on data that needs to be recorded.</li> <li>• Basis for values is unclear and how they relate to effects on environment.</li> <li>• Limits should be determined taking into account catchment loadings.</li> <li>• Needs to be clear linkage between rule and relevant discharge for rule to be lawful.</li> <li>• Overseer 6 will be obsolete in time.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Horticulture New Zealand	269	Oppose	Delete Rule 12.C.1.3 and establish a process to work with growers to develop a rule that is practical and workable for growers, including undertaking base research to establish N leaching figures from a range of horticultural crops grown in the region.	<ul style="list-style-type: none"> <li>• No rationale for the N leaching figures.</li> <li>• OVERSEER 6.0 does not include all horticultural crops and will be outdated in 2019.</li> <li>• Not appropriate for all data to be supplied to ORC or ORC to undertake nutrient budgets for every rural landowner applying nitrogen.</li> <li>• No consideration of cost.</li> <li>• Maps based on scale that's impossible to determine if grower in or out of nitrogen sensitive zones.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Measurement process to establish N level/ha unworkable.</i></li> <li>• <i>Landuse management not the ORC's role.</i></li> <li>• <i>Cost to implement the plan change will be huge.</i></li> <li>• <i>If there is valid need to restrict N usage in specific areas this should be developed in consultation with land users and sectors, not by imposition.</i></li> </ul>
Forest and Bird	271	Amend	Amend to read: "The discharge of nitrogen from land to groundwater, is a permitted activity, providing: (i) From 31 March 2019 2017, calculated nitrogen leaching by the Council using the latest OVERSEER.... (a) ...; and (b) 25 kilograms ...."  Add cross reference to Rule 12.C.0.1.  Add North Otago Volcanic Aquifer to Map I and ensure all aquifers	<ul style="list-style-type: none"> <li>• Supports identifying nitrogen sensitive zones, and the tailoring of nitrogen limits accordingly.</li> <li>• Doubt whether all aquifers and nitrogen sensitive zones have been identified.</li> <li>• Inconsistencies between PC6A and consultation materials.</li> <li>• Needs to clarify N discharges to groundwater are only permitted if not prohibited under 12.C.0.1.</li> <li>• OVERSEER is likely to be updated in future.</li> <li>• March 2019 provides an unnecessarily long time lag.</li> </ul>

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			are incorporated into the plan and maps.	
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Requested change is unnecessary and inappropriate, not based on clear rationale or science, restrictive, and no clear environmental benefits.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Not all waterways need to be enhanced.</li> <li>Background data required before any agricultural activities are restricted.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Reduced timeframe and threshold is unrealistic for implementation.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Background data required before any steps are taken to restrict agricultural activities.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
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<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Already difficulties achieving rule, proposed changes make rule less achievable and realistic with no scientific justification.</li> <li>Oppose map changes.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Number suggested is arbitrary and has no basis.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 100</i>		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Ken Telford	272	Oppose	The measurement of nitrogen leachates using OVERSEER has been shown to be unreliable.	<ul style="list-style-type: none"> <li>OVERSEER model has not proven to be reliable.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 272 ref. 100</i>		<i>• Concern with referring to specific version of Overseer (not available and may be superceded).</i>
Fish and Game (Central South Island)	273	Amend	Amend the rules, or insert advice notes, to allow for the implementation of the next version of OVERSEER, if it reaches a specified technical threshold.  Review the evidential basis for the setting of the limits for nitrogen per hectare and make corresponding changes.  Add a schedule indicating in which catchments compliance with the application limits is likely to be difficult.	<ul style="list-style-type: none"> <li>• Need for research to assess appropriateness of the limits (particularly the 30kg N/ha/yr on wet soils).</li> <li>• Need for guidance on compliance and monitoring in catchments where it may be difficult to meet the standards.</li> <li>• Council should not be limited by one version of specific software.</li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Support submission 273 ref. 100</i>		<i>• Support submitter's request for the rule to be amended, or insert advice notes, to allow for the implementation of the next version of OVERSEER.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 100</i>		<i>• Not all waterways should have a high standard of water quality.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
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<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose in part submission 273 ref. 100</i>		<i>The limits should not be reduced.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 273 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Appropriate not to refer to specific Overseer version.</i></li> <li>• <i>Lack of evidential basis for limits.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 273 ref. 100</i>		<i>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i>

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<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 273 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</i></li> </ul>
Karl Guy	276	Amend	Would like to see the limit lifted to at least 50 kg N and the time frame be extended until 2025.	<ul style="list-style-type: none"> <li>• Will cause issues for farmers on border-dyke irrigation schemes including: 1) need to convert to different irrigation system; 2) need to become less intensive; both of which have financial implications.</li> <li>• More monitoring is needed before any rules are put in place.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 276 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Mark Kingsbury	277	Oppose	The rule needs to be reworked to provide for catchment loading and testing rather than modelling to determine compliance with any nitrogen leaching rules. Non-compliance with Overseer values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> <li>• Concerned about use of Overseer to determine compliance with rule as it only provides a theoretical leaching figure.</li> <li>• Limit values don't reflect catchment differences and should be determined by actual groundwater testing.</li> <li>• Compliance with rule could risk economic viability of farming business.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 277 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
Federated Farmers of New Zealand	278	Amend	That Council delete Rule 12.C.1.3 and replace with a modified rule relying on amended Schedule 16 discharges. Or If the rule is adopted then the following amendments are made: "The discharge of nitrogen from land to groundwater, is a permitted activity providing: (i) From 31 March 2019, calculated nitrogen leaching by the Council using from any one farming enterprise does not exceed: (a) 30 kilograms nitrogen.... (b) 50 kilograms nitrogen... (c) add additional limits based on the receiving environment and specific to catchments. (ii) Upon request, the person with responsibility for the management of the land supplies the Council verified OVERSEER records by an accredited OVERSEER operator. Where limits in rule 12.C.1.3 are exceeded under this rule a resource consent is required under Rule 12.C.2.1."	<ul style="list-style-type: none"> <li>• Supports permitted approach but limits aren't realistic or achievable in many cases.</li> <li>• Nitrogen sensitive zones will put people out of business.</li> <li>• Farmers won't know if they are meeting nitrogen limits until OVERSEER run by an accredited person.</li> <li>• Input information should be administered by landholder, not ORC.</li> <li>• Oppose use of specific version of OVERSEER and retrospective use of this tool to determine compliance with permitted activity rule.</li> <li>• OVERSEER works well for pastoral farmers, but lacks precision for irrigated land and for mixed use and cropping farmers.</li> <li>• Use of maximum permitted leaching rates is not effects-based and is inconsistent with the proposed plan change.</li> <li>• Receiving environment, rather than blanket catchment-based approach, needs to be taken.</li> <li>• Discharge must be represented by the change in water quality across a property, overcomes issue of upgradient cumulative additions.</li> <li>• If nitrogen sensitive zones not removed then loss needs to be higher, and the phase in times longer.</li> <li>• Rule needs to default to restricted discretionary activity if limits can't be met.</li> <li>• Unclear about application of rule at catchment, farm, hectare or paddock.</li> </ul>
<i>B &amp; J Smith</i>	1006	<i>Support submission 278 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits are not realistic or achievable.</i></li> <li>• <i>Huge social, economic impacts to region.</i></li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Catchment and aquifer-based approach to nitrogen limits is appropriate.</i></li> <li>• <i>There is no evidence to support higher limits.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Operation relies on natural streams for continuing viability.</i></li> <li>• <i>Plan change has huge impact on farming business.</i></li> <li>• <i>Plan change does not differentiate between intensive farming and extensive</i></li> </ul>



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				<i>pastoral grazing.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 100</i>		<i>• No reason given.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 278 ref. 100</i>		<i>• Rule has to be set at achievable levels.</i>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 278 ref. 100</i>		<i>• Catchment- and aquifer-based approach to nitrogen limits is appropriate and necessary to manage cumulative effects.</i> <i>• No evidence to support higher limits.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 100</i>		<i>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i> <i>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 100</i>		<i>• Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i> <i>• Effects-based approach should allow for discharges that exceed Schedule 16 limits.</i> <i>• Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</i>
Fish and Game (Otago)	287	Amend	Amend the rules, or insert advice notes, to allow for the implementation of the next version of OVERSEER, if it reaches a specified technical threshold.  Provide for public access to the nutrient application information used for the running of OVERSEER.  Or such other relief that gives effect to [submission].	<i>• Information supplied to the ORC for running OVERSEER should be public knowledge.</i> <i>• Don't limit the process to OVERSEER 6.0 as a version with better quality and accuracy software may come along.</i>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 287 ref. 100</i>		<i>• Information on nutrient application can be commercially sensitive to a farmers business.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 100</i>		<i>• Not all waterways should have a high standard of water quality.</i> <i>• Affected by a variety of activities, not just agricultural uses.</i> <i>• Imposes unnecessary constraints on farming practices.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 100</i>		<i>• Unnecessary constraints on farming practices.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
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<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 287 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 287 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</i></li> </ul>
Fish and Game (Otago)	287	Amend	<p>Review the evidential basis for the setting of the limits for nitrogen per hectare and make corresponding changes to address the concerns raised.</p> <p>Add a schedule indicating in which catchments compliance with the application limits is likely to be difficult.</p> <p>Add a provision specifying that nutrient input information be publicly available.</p>	<ul style="list-style-type: none"> <li>• Support rule.</li> <li>• Would like to see research done that indicates the 30 kgN/ha/yr will result in compliance.</li> <li>• May need two limits (for wet and dry), or further limits based on soil type/catchment.</li> <li>• 10kg limit in sensitive areas supported.</li> <li>• Include a schedule of catchments where limits not easily achievable to guide compliance and monitoring.</li> <li>• Re Condition (ii) data about nutrient input - is it publicly available, as would be widely useful to help understand effects of land use.</li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Support submission 287 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Support submitter's request for the rule to be amended, or insert advice notes, to allow for the implementation of the next version of OVERSEER.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 287 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</i></li> </ul>
Waitensea Ltd	290	Oppose	The limit of 30 kgN/ha/yr is removed.	<ul style="list-style-type: none"> <li>• Results in all border dyking going to spray irrigation.</li> <li>• ORC not taken into consideration economic impact.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 290 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
<i>Clydevale Dairy Farms Ltd</i>	297	Amend	Amend Rule 12.C.1.3, so that it addresses the issue from catchment perspective and provides a more legally correct compliance test.	<ul style="list-style-type: none"> <li>• No flexibility either at catchment level or within individual properties.</li> <li>• N loads need determined/managed on catchment-basis, allowing individuals to better manage their land from economic perspective while avoiding, remedying or mitigating effects.</li> <li>• Concerned about OVERSEER as mechanism for compliance with Rule. Few farmers will be familiar with this approach and no guidance is provided with Rule.</li> <li>• Compliance should be tested on ground rather than modelled. May have legal implication for Council's approach.</li> </ul>
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			
<i>Federated Farmers of New</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions/systems.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submissions 297 – 299 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> <li>• <i>Concern with Overseer V6.</i></li> </ul>
M W Smith	300	Oppose	Oppose the proposed N loading limits under Rule 12.C.1.3 as they will have a severe impact on my farming operation and are based on an unproven model that has not been peer reviewed.	<ul style="list-style-type: none"> <li>• Limits may prove unworkable unless border dyke replaced with spray system; issues are capital and power costs, reliability of water supply.</li> <li>• Shelter belt removal has animal welfare implication.</li> <li>• Potential for reduction in stock and therefore income.</li> <li>• N-loading model not tested or peer reviewed in Otago.</li> <li>• Blanket approach takes no account of variation in factors.</li> <li>• While easy to administer, it may lead to water quality degradation.</li> <li>• OVERSEER 6.0 yet to be released so not yet known how properties sit for N.</li> <li>• OVERSEER is evolving but subsequent versions not provided for.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 300 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
The Director-General of Conservation	306	Amend	That 12.C.1.3 be amended as follows, or to like effect: "The discharge of nitrogen from land ... (i) From 31 March 2019, calculated nitrogen leaching by Council using OVERSEER version 6.0 or its successor(s) ..."	<ul style="list-style-type: none"> <li>• Continual updating should be recognised.</li> <li>• Support remainder of provision.</li> </ul>
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose submission 306 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>No evidence from environmental impacts from agricultural activities.</i></li> <li>• <i>Changes are vague, unclear and open-ended.</i></li> <li>• <i>No need for further restrictions on discharges.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	<i>1019</i>	<i>Oppose submission 306 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Would impact on farming operation.</i></li> <li>• <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li>• <i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Oppose submission 306 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 100		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support in part submission 306 ref. 100		<ul style="list-style-type: none"> <li>• Concern with referring to specific version of Overseer.</li> </ul>
Alliance Group Limited	1060	Oppose submission 306 ref. 100		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 100		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 100		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 100		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>
Clutha District Council	308	Amend	Rule 12.C.1.3 be reworked to provide for catchment loading. Compliance with any nitrogen leaching rules should also be determined by testing rather than modelling. Non-compliance with the OVERSEER values should not found a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> <li>• Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule.</li> <li>• No guidance on the data that needs recording.</li> <li>• Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits.</li> <li>• Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.</li> </ul>
Dunedin City Council	1025	Support submission 308 ref. 100		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
Strath Taieri Community Board	1029	Support submission 308 ref. 100		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Central Otago Wine Growers	1054	Support		<ul style="list-style-type: none"> <li>• Support the use of catchment loading and that guidance needed on</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Association</i>		<i>submission 308 ref. 100</i>		<i>information required.</i> <ul style="list-style-type: none"> <li>• <i>Concerned about legality compliance mechanism and non-compliance being determined by modelling.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> </ul>
Glen Dene Limited	310	Amend	Delete Rule 12.C.1.3; or	<ul style="list-style-type: none"> <li>• Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule.</li> <li>• No guidance on the data that needs recording.</li> <li>• Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits.</li> <li>• Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 - 326 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Limits not realistic or achievable.</i></li> <li>• <i>Despite taking precautions farmers may breach limits.</i></li> <li>• <i>Not appropriate to refer to specific version of Overseer.</i></li> <li>• <i>Inconsistent with RMA Part II and s107.</i></li> <li>• <i>Objectives and policies don't support prohibited activity status.</i></li> </ul>
<i>John Webster</i>	1063	<i>Support submission 322 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Support the deletion of the rule until further testing and science can justify its inclusion.</i></li> </ul>
<i>Nicholas Webster</i>	1069	<i>Support submission 322 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>No scientifically backed evidence to support 10 kg/ha in sensitive areas.</i></li> <li>• <i>No account given to economic effects of implementation.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 100</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</i></li> </ul>
Peter Rowland	328	Amend	To delay the implementation of this rule until further scientific environmental and economic studies are completed.	<ul style="list-style-type: none"> <li>• No onsite scientific studies have been carried out.</li> <li>• Existing farming operations in sensitive areas will not be able to continue.</li> <li>• Large changes in farming operations will be required.</li> <li>• OVERSEER Version 6.0 is unknown at this time.</li> <li>• What benefit is there/how long would it take to lower Nitrogen levels in the North Otago Volcanic Aquifer. North Otago Volcanic Aquifer is not used for drinking water and discharges to sea.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 328 ref. 100</i>		<ul style="list-style-type: none"> <li>• Limits not realistic or achievable.</li> <li>• Despite taking precautions farmers may breach limits.</li> <li>• Not appropriate to refer to specific version of Overseer.</li> <li>• Inconsistent with RMA Part II and s107.</li> <li>• Objectives and policies don't support prohibited activity status.</li> </ul>
Richard Williams	329	Oppose	Recommend the ORC carry out some more indepth studies and report back with more data.	<ul style="list-style-type: none"> <li>• Oppose rule relating to nitrogen discharge on Lower Waitaki Plains</li> <li>• Insufficient research done on the proper monitoring systems.</li> <li>• OVERSEER 6.0 is not available yet.</li> <li>• Conversion of borderdyke to spray irrigation generates huge cost and problems with power supply.</li> <li>• Nitrate levels on Lower Waitaki Plains are not high, despite the plains being extensively changed.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 329 ref. 100</i>		<ul style="list-style-type: none"> <li>• Limits not realistic or achievable (particularly for Lower Waitaki).</li> <li>• Despite taking precautions farmers may breach limits.</li> <li>• Not appropriate to refer to specific version of Overseer.</li> <li>• Inconsistent with RMA Part II and s107.</li> <li>• Objectives and policies don't support prohibited activity status.</li> </ul>
R & M Borrie Ltd	331	Amend	Higher N leaching level - 50 units.	<ul style="list-style-type: none"> <li>• Don't believe it to be based on correct data.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 331 ref. 100</i>		<ul style="list-style-type: none"> <li>• Limits not realistic or achievable.</li> <li>• Despite taking precautions farmers may breach limits.</li> <li>• Not appropriate to refer to specific version of Overseer.</li> <li>• Inconsistent with RMA Part II and s107.</li> <li>• Objectives and policies don't support prohibited activity status.</li> </ul>

#### 101 Rule 12.C.1.4 - Animal waste permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Amend	Should all be permitted.	<ul style="list-style-type: none"> <li>• Repair and maintenance of irrigation systems.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 70 ref. 101</i>		<ul style="list-style-type: none"> <li>• Difficult to monitor and enforce due to differing performance of catchments following rainfall.</li> <li>• Farmers may not know if they are complying or not at a particular time.</li> <li>• More technical robustness needed.</li> <li>• Need provision for reasonable mixing.</li> </ul>
Southern District Health Board	103	Amend	The separation of discharges from animal waste systems with drinking water bores should be Controlled or Discretionary activities which then allows for consideration of the soil types, topography and protective structures around the bore.	<ul style="list-style-type: none"> <li>• Many small rural water schemes and domestic bores in Otago.</li> <li>• Use of 50 m distance without consideration for soil type, or short circuiting via surface or subsurface saturation, an unacceptable public health risk (supported by research - further information attached as appendix to submission).</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 103 ref. 101</i>		<ul style="list-style-type: none"> <li>• Gives effect to the RMA.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support in part submission 103 ref. 101</i>		<ul style="list-style-type: none"> <li>• Controlled status for activity would allow for consideration of soil types, topography and protective structures around the bore.</li> <li>• Increasing the bufferzone distance to 100m would be an alternative to controlled status.</li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 103 ref. 101</i>		<ul style="list-style-type: none"> <li>• Nga Runanga oppose the discharge of waste to water.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being</i>	1074	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• Does take into account local environmental conditions and</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>partners of the Dairy Farms Partnership</i>		<i>submission 103 ref. 101</i>		<i>economic/development consideration.</i> <i>• Disproportionate and overly restrictive.</i>
The Cow Farm Limited	133	Amend	Amend the rule to quantify what level of discharge is considered appropriate rather than using a generic distance requirement.	<ul style="list-style-type: none"> <li>• Generic 50 m requirement potentially allows significant contaminant discharge as permitted activity,</li> <li>• Unclear how it relates to prohibited Rule 12.C.0.5.</li> <li>• Activities not considered on basis of actual and potential effects, inconsistent with RMA.</li> <li>• No reasonable justification for 50 m separation.</li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 133 ref. 101</i>		<i>• The discharge of animal waste to water is not supported. Amending the rule to require consideration of the effects of the discharge on water quality is supported.</i>
New Zealand Pork Industry Board	145	Support	Retain Rule 12.C.1.4.	• No reason given.
Dairy NZ Limited	146	Amend	Change the rule to incorporate a maximum daily discharge quantity and to remove any possible contradiction with Rule 12.C.0.5.	<ul style="list-style-type: none"> <li>• Could allow contamination of water supplies.</li> <li>• Discharge limit to be base on science and range of potential hydrogeological settings in Otago.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 146 ref. 101</i>		<i>• Need amendments to ensure compliance framework has certainty around safe application of contaminants to land.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 101</i>		<i>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 146 ref. 101</i>		<i>• The discharge of animal waste to water is not supported.</i> <i>• Amending the rule to require consideration of the effects of the discharge on domestic or public water supplies is supported.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 101</i>		<i>• Need for provision in the transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge standards.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 101</i>		<i>• Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	Rule 12.C.1.4 be redrafted as follows: The discharge of contaminants from any animal waste system, silage storage or composting process to land is a permitted activity, providing...	• Supports rule, drafting inconsistent with Rule 12.C.0.5.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 101</i>		<ul style="list-style-type: none"> <li>• The rule correctly addresses discharges of contaminants from animal waste system to land.</li> <li>• Other non-point source contaminant discharges are adequately dealt with elsewhere in the proposed plan.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 101</i>		<i>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 101</i>		<i>• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
Jeremy Bisson	223	Amend	Dairy effluent discharge should be a controlled activity requiring site specific resource consents.	• New rule is inadequate in controlling application of effluent and its effects on water quality.
Preserve Our Water Society Inc	225	Amend	Effluent discharge should be a discretionary activity requiring resource consent.	<ul style="list-style-type: none"> <li>• Provides inadequate controls on effluent application to land.</li> <li>• ORC needs to follow E-Can and E-Southland and require consents for effluent discharges.</li> </ul>
<i>Federated Farmers of New</i>	1057	<i>Oppose</i>		<i>• Permitted status more appropriate.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 225 ref. 101</i>		
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 225 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
David Blair	237	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> <li>• Consider carrying capacity for sensitive areas.</li> <li>• Consider destocking non-performing farmers.</li> <li>• Consider effect of abstraction on concentrating pollutants.</li> </ul>
Fonterra Co-operative Group Limited	241	Amend	Change the rule to incorporate a maximum daily discharge quantity and to remove any possible contradiction with Rule 12.C.0.5.	<ul style="list-style-type: none"> <li>• Could allow contamination of water supplies.</li> <li>• Discharge limit to be base on science and range of potential hydrogeological settings in Otago.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 241 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 241 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>The discharge of animal waste to water is not supported. Amending the rule to require consideration of the effects of the discharge on domestic or public water supplies is supported.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Oppose	Seeks clarification of the activity status for a discharge of contaminants from any animal waste system to land should it not comply with Rule 12.C.1.4, and would seek such an activity to be restricted discretionary.	<ul style="list-style-type: none"> <li>• Unclear what the activity status becomes if rule isn't complied with.</li> <li>• Appears to default to prohibition which is opposed.</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc	252			
<i>Mr RJ Borst</i>	1034	<i>Support submissions 248 and 252 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Rules need to be clear and unambiguous.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Support</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so</i></li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 248 ref. 101</i>		<i>that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i>
North Otago Irrigation Company	260	Amend	Requests ORC amend Rule 12.C.1.4 to include as (c) the following wording: '... any collection or storage system is sealed so as to prevent any contamination of water in any water body, drain or water race'.	<ul style="list-style-type: none"> <li>Sealing essential to be compliant with rules, but may not be obvious to farmers from this rule.</li> <li>Helpful to include prescriptive rules as bottom line.</li> <li>Avoids contractors and consultants advising farmers that ponds do not require sealing.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 101</i>		<i>• Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 101</i>		<i>• Support the NOIC submission in full.</i>
Ballance Agri-Nutrients Ltd	262	Amend	Seeks clarification of the activity status for a discharge of contaminants from any animal waste system to land should it not comply with Rule 12.C.1.4, and would seek such an activity to be restricted discretionary.	<ul style="list-style-type: none"> <li>Unclear what the activity status becomes if rule isn't complied with.</li> <li>Appears to default to prohibition which is opposed.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 101</i>		<i>• Rules need to be clear and unambiguous.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 101</i>		<i>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Support	Approve Rule 12.C.1.4 in its present form.	<i>• Rule appropriately provides for farming activities, is most appropriate method to achieve objectives and policies, and best meets purpose of the RMA.</i>
Colin Scurr	268	Support	All the performance standards for discharges from animal waste systems should be included within the same Rule to avoid misunderstanding about what needs to be complied with.	<i>• Rule as proposed and its relationship to other rules is confusing.</i>
Forest and Bird	271	Amend	Amend to read:	<i>• Contaminants within animal waste systems are highly likely to cause adverse</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			"12.C.1.4 The discharge of contaminants from any animal waste system to land, is a permitted activity, providing: (a) The discharge occurs more than 50 metres from any surface water body, any bore used to supply water for domestic needs; and"	effects on aquatic ecosystems.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Limitations on animal waste discharges are unnecessary and inappropriate.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Background data required before any steps are taken to restrict agricultural activities.</i></li> <li>• <i>Limitations on animal waste discharges are unnecessary and inappropriate.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No scientific justification.</i></li> <li>• <i>Could have significant impact on farming.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose in part submission 271 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Buffer distance is too great.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	278	<i>Amend</i>	Adopt rule with amendments to ensure that the plan provides a framework for compliance certainty around the safe application of these contaminants to land: "Where permitted activity standards are exceeded under this rule a	<ul style="list-style-type: none"> <li>• <i>Supports permitted approach.</i></li> <li>• <i>Need to provide guidance on good practice for the application of contaminants to land.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			resource consent is required under rule 12.C.2.1."	
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Practical and workable alternatives, solutions and suggestions.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Operation relies on natural streams for continuing viability.</i></li> <li>• <i>Plan change has huge impact on farming business.</i></li> <li>• <i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i></li> <li>• <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i></li> <li>• <i>Effects-based approach should allow for discharges that exceed Schedule 16 limits.</i></li> </ul>
<i>Clydevale Dairy Farms Ltd</i>	297	Support	Clarify what rules apply to this activity and the status of the activity.	<ul style="list-style-type: none"> <li>• Supported but parts of other rules may make this prohibited. This needs clarified.</li> </ul>
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			
<i>William John Pile</i>	301	Oppose	Each area to be treated on its soil type.	<ul style="list-style-type: none"> <li>• Each area must be handled differently because of soil type.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 301 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No adequate justification for prohibited activity status</i></li> <li>• <i>Rule not practical or reasonable and too vague regarding what appropriate mitigation is.</i></li> <li>• <i>Sediment runoff can occur regardless of land use.</i></li> </ul>
The Director-General of Conservation	306	Amend	That 12.C.1.4 be amended as follows, or to like effect: "The discharge of contaminants from any animal waste system to land, is a permitted activity, providing: (a) The discharge occurs more than 50 metres from any bore used to supply water for domestic needs or drinking water for livestock; and (b) There is no discharge onto any other person's property without the other person's agreement; and (c) The discharge occurs more than 50m from any surface water body or coastal water; and (d) There is no discharge of contaminants from any animal waste system either directly or via overland flow or indirectly via soil and subsurface drainage systems to any water body, or coastal water."	<ul style="list-style-type: none"> <li>• Contaminants highly likely to cause adverse effect on aquatic ecosystems and should be controlled.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No evidence from environmental impacts from agricultural activities.</i></li> <li>• <i>Changes are vague, unclear and open-ended.</i></li> <li>• <i>No need for further restrictions on discharges.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Would impact on farming operation.</i></li> <li>• <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li>• <i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr RJ Borst	1034	Oppose submission 306 ref. 101		<ul style="list-style-type: none"> <li>Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>Inappropriate to ask for changes to land management practices in absence of clear baseline of environmental impact from existing land management practices.</li> <li>Sought changes vague, unclear and open-ended.</li> <li>Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 101		<ul style="list-style-type: none"> <li>Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>Shouldn't restrict necessary farming discharges.</li> <li>No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 101		<ul style="list-style-type: none"> <li>Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>Inappropriate to ask for changes to land management practices in absence of clear baseline of environmental impact from existing land management practices.</li> <li>Sought changes vague, unclear and open-ended.</li> <li>Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 101		<ul style="list-style-type: none"> <li>12.C.1.4(c): Contrary to effects-based approach; animal waste contamination adequately addressed by Schedule 16 and associated rules.</li> <li>12.C.1.4(d): If this provision is adopted, it needs to apply the Schedule 16 timeframes and limits.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 101		<ul style="list-style-type: none"> <li>Difficulty in managing and addressing.</li> <li>Need greater scientific justification.</li> </ul>
Alliance Group Limited	1060	Oppose submission 306		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 101</i>		<i>in its original submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i></li> </ul>
<i>Hawkdun Idaburn Irrigation Company Limited</i>	1066	<i>Oppose submission 306 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Oppose additional (c) &amp; (d), both impractical to implement and monitor.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</i></li> <li>• <i>Rules fail relevant tests under section 32 RMA.</i></li> <li>• <i>Additional controls not justified in terms of effects.</i></li> <li>• <i>Seek the submission be disallowed.</i></li> </ul>
Clutha District Council	308	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> <li>• The rules are confusing as a number of different rules may apply.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 308 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Agree rules should be clear and provide for circumstances where schedule 16 cannot be complied with.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 101</i>		<ul style="list-style-type: none"> <li>• <i>Reduces confusion and ensures usability.</i></li> </ul>
Glen Dene Limited	310	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> <li>• The rules are confusing as a number of different rules may apply.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport	323			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Limited				
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Alliance Group Limited</i>	1060	Support submission 323 ref. 101		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	Support in part submission 326 ref. 101		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

### 102 Rule 12.C.1.5 - Water to water permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Amend	Should all be permitted. Delete 12.C.1.5(i) from the rule.	<ul style="list-style-type: none"> <li>Repair and maintenance of irrigation systems.</li> <li>Scheme picks up water from 2 watersheds.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 70 ref. 102		<ul style="list-style-type: none"> <li>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</li> <li>Farmers may not know if they are complying or not at a particular time.</li> <li>More technical robustness needed.</li> <li>Need provision for reasonable mixing.</li> </ul>
Invernia Holdings Ltd	83	Oppose	Irrigation runoff should be able to be collected and re-used.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
The Cow Farm Limited	133	Amend	Amend the rule to provide better clarity and some measureable targets.	<ul style="list-style-type: none"> <li>"No change to water level or hydrological function" are generic terms and not effects-based.</li> <li>No consideration for naturally fluctuating water levels where such changes may not have adverse effects but for which consent would be required.</li> <li>No evidence that Schedule 16 based on robust science.</li> <li>Rule doesn't differentiate between water bodies which would not be affected by minor discharges.</li> </ul>
Dairy NZ Limited	146	Amend	Change the rule to remove the reference to Schedule 16.  Change the rule to remove the absolute requirement for "...no change to the water level or hydrological function..."	<ul style="list-style-type: none"> <li>Schedule 16 extremely difficult to meet.</li> <li>Not justified to ensure attainment of receiving water standards.</li> <li>Clause (ii)(a) "no change" prevents the rule having any actual application.</li> </ul>
<i>Contact Energy Limited</i>	1013	Support in part submission 146 ref. 102		<ul style="list-style-type: none"> <li>Supports opposition to a "no change" position.</li> <li>Impractical to achieve it in practice.</li> </ul>
<i>Horticulture New Zealand</i>	1032	Support in part submission 146 ref. 102		<ul style="list-style-type: none"> <li>For reasons given by the submitter.</li> </ul>
<i>Alliance Group Limited</i>	1060	Support submission 146 ref. 102		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Support in part submission 146 ref. 102		<ul style="list-style-type: none"> <li>Need for provision in the transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge standards.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose in part submission 146 ref. 102		<ul style="list-style-type: none"> <li>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki	197	Support	Retain rule as currently drafted.	<ul style="list-style-type: none"> <li>Supports rule.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
& Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga				
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 102</i>		<ul style="list-style-type: none"> <li>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 102</i>		<ul style="list-style-type: none"> <li>• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</li> </ul>
NZ Transport Agency	203	Oppose	Remove clause (ii) of Rule 12.C.1.5.	<ul style="list-style-type: none"> <li>• S15 of RMA distinguishes between water and contaminants.</li> <li>• If rule is about discharge of water, clause (ii) confuses and inconsistent with Rule 12.C.1.2.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 102</i>		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 102</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Trustpower Limited	206	Amend	Amend the proposed rule as follows: "Excluding discharges captured by Rule 12.C.1.6, the discharge of water to water, or water to a Regionally Significant Wetland, that ..."	<ul style="list-style-type: none"> <li>• Clarity on how rules work together</li> <li>• Rule should not apply in addition to meeting Rule 12.1.2.6 for dam discharges.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 102</i>		<ul style="list-style-type: none"> <li>• Reasons stated in the submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 206 ref. 102</i>		<ul style="list-style-type: none"> <li>• Inconsistent with relief sought by further submitter.</li> </ul>
Dunedin City Council	211	Amend	That clause (ii) of Rule 12.C.1.5 is deleted.	<ul style="list-style-type: none"> <li>• Causes confusion.</li> <li>• Not consistent with approach in Rule 12.C.1.2.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 102</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 211 ref. 102</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 102</i>		<ul style="list-style-type: none"> <li>• Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>• Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> </ul>
Fulton Hogan Limited	222	Amend	Change the rule to replace the term "no change" in sub-clause (a) with a more achievable test as follow:	<ul style="list-style-type: none"> <li>• Plain meaning of "no change" provides a very stringent test that is unlikely to be met.</li> </ul>
Holcim (New Zealand) Limited	224		"(ii) Where it contains any of the contaminants listed in Schedule 16, the quantity of contaminants in the discharge does not exceed the limits given in Schedule 16, (iii) Where there is no change to the water level or hydrological function, and no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland, is a permitted activity."	
Kawarau Station Limited	232	Amend	Amend to remove requirement of "no change in the water level or hydrological function".	<ul style="list-style-type: none"> <li>• Unattainable to continue contour irrigation.</li> </ul>
David Blair	237	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> <li>• Consider carrying capacity for sensitive areas.</li> <li>• Consider destocking non-performing farmers.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Fonterra Co-operative Group Limited	241	Amend	Change the rule to remove the reference to Schedule 16.  Change the rule to remove the absolute requirement for "...no change to the water level or hydrological function..."	<ul style="list-style-type: none"> <li>• Consider effect of abstraction on concentrating pollutants.</li> <li>• Schedule 16 extremely difficult to meet.</li> <li>• Not justified to ensure attainment of receiving water standards.</li> <li>• Clause (ii)(a) "no change" results in rule having any actual application.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 102</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 16 with amendments to include TN and TP and improve clarity is relevant.</i></li> <li>• <i>Maintaining water levels and hydrological functions of regionally significant wetlands is essential for their protection.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 241 ref. 102</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 102</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
Rod Philip	242	Amend	This clause needs some context.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Supports in principle the permitted activity rule, [but] seeks amendment to Rule 12.C.1.5 to read as follows or similar: "The discharge of water (including groundwater) to water (including surface water), or water to a Regionally Significant Wetland, " "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland, resulting from the activity the subject of this rule".	<ul style="list-style-type: none"> <li>• Clarification as to whether the term 'water to water' includes groundwater to surface water.</li> <li>• Concern about the inability of existing and future farming operations to meet limits.</li> <li>• Condition (a) is ambiguous.</li> <li>• Section 12.C applies to any discharge not specifically provided for in sections 12.A or 12.B, therefore a discharge of contaminants from an animal waste system to land would be prohibited by default.</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc	252		Seeks issues relating to Schedule 16 addressed, and clarification of the activity status for a discharge of water (including groundwater) to water (including surface water) should it not comply with Rule 12.C.1.5, and would seek such an activity be restricted discretionary.	
<i>Mr RJ Borst</i>	1034	<i>Support submissions 248 and 252 ref. 102</i>		<ul style="list-style-type: none"> <li>• <i>Rules need to be clear and unambiguous.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	Support submission 248 ref. 102		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Waitaki Irrigators Collective Limited	257	Oppose	Remove Rule 12.C.1.5 or provide a clearer definition of the term "water".	<ul style="list-style-type: none"> <li>• Farmer could be prosecuted if discharges exceed limits that enter puddles, created wetlands or confined water.</li> <li>• Unfairness in interpretations and enforcement.</li> </ul>
North Otago Irrigation Company	260	Oppose	Remove Rule 12.C.1.5.  Clarify if the water in gullies must meet the discharge limits (where it discharges to a receiving water body) or if the discharge limits only apply to discharges to this water.	<ul style="list-style-type: none"> <li>• Difficult to know how and where discharge limits apply where water is discharged to water - would apply where a farm drain or watercourse discharges to a watercourse.</li> <li>• Discharge limits not achievable - even with best practice - will require changes that will severely impact on economic viability of farming (does not meet RMA requirement of balancing economic/social considerations with environmental).</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 260 ref. 102		<ul style="list-style-type: none"> <li>• Unclear how rule will be administered.</li> <li>• Difficulties will arise when a regionally significant wetland involved.</li> </ul>
<i>John Webster</i>	1063	Support submission 260 ref. 102		<ul style="list-style-type: none"> <li>• Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
<i>Peter Mitchell</i>	1064	Support submission 260 ref. 102		<ul style="list-style-type: none"> <li>• Support the NOIC submission in full.</li> </ul>
Ballance Agri-Nutrients Ltd	262	Amend	Supports in principle the permitted activity rule, [but] seeks amendment to Rule 12.C.1.5 to read as follows or similar: "The discharge of water (including groundwater) to water (including surface water), or water to a Regionally Significant Wetland, " "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland, resulting from the activity the subject of this rule".  Seeks issues relating to Schedule 16 addressed, and clarification of the activity status for a discharge of water (including groundwater) to water (including surface water) should it not comply with Rule 12.C.1.5, and would seek such an activity be restricted discretionary.	<ul style="list-style-type: none"> <li>• Clarification as to whether the term 'water to water' includes groundwater to surface water.</li> <li>• Concern about the inability of existing and future farming operations to meet limits.</li> <li>• Condition (a) is ambiguous.</li> <li>• Section 12.C applies to any discharge not specifically provided for in sections 12.A or 12.B, therefore a discharge of contaminants from an animal waste system to land would be prohibited by default.</li> </ul>
<i>Mr RJ Borst</i>	1034	Support submission 262 ref. 102		<ul style="list-style-type: none"> <li>• Rules need to be clear and unambiguous.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Alliance Group Limited	1060	Support submission 262 ref. 102		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Colin Scurr	268	Amend	Amend	<ul style="list-style-type: none"> <li>Regionally Significant Wetlands need to be carefully managed.</li> <li>Not clear how limits are related to environmental effects.</li> </ul>
Horticulture New Zealand	269	Amend	Amend Rule 12.C.1.5 a) as follows: "There are no more than minor effects to the water level or hydrological function ..."	<ul style="list-style-type: none"> <li>Almost impossible to meet. Any discharge is likely to cause a degree of change.</li> <li>Discharges of water to water can have positive effects on ecosystems.</li> </ul>
Meridian Energy Limited	1014	Support/Oppose in part submission 269 ref. 102		<ul style="list-style-type: none"> <li>Agrees that proposed standard is unrealistic and uncertain, and opposes rules that fail to provide certainty.</li> <li>However, submitter's proposed amendment is uncertain and subjective as well.</li> </ul>
Alliance Group Limited	1060	Support submission 269 ref. 102		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Etrick Fruitgrowers Association Inc	1067	Support submission 269 ref. 102		<ul style="list-style-type: none"> <li>Measurement process to establish N level/ha unworkable.</li> <li>Landuse management not the ORC's role.</li> <li>Cost to implement the plan change will be huge.</li> <li>If there is valid need to restrict N usage in specific areas this should be developed in consultation with land users and sectors, not by imposition.</li> </ul>
Forest and Bird	271	Support	Retain as publicly notified.	<ul style="list-style-type: none"> <li>Rule is appropriate and gives effect to RMA.</li> </ul>
Craiglea Limited	1012	Oppose submission 271 ref. 102		<ul style="list-style-type: none"> <li>Not all waterways need to be enhanced.</li> </ul>
Mr RJ Borst	1034			
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries	1049			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 102</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 102</i>		<ul style="list-style-type: none"> <li>• Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 102</i>		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Federated Farmers of New Zealand	278	Amend	<p>Amend the rule to provide certainty on how the rule will be enforced or monitored.</p> <p>Delete the provision relating to the change in water level of a Regionally Significant Wetland.</p> <p>[Add] "Where limits in rule 12.C.1.5 are exceeded under this rule a resource consent is required under rule 12.C.2.1."</p>	<ul style="list-style-type: none"> <li>• Accept all discharges to water have to meet acceptable limits.</li> <li>• Unclear how rule to be administered (e.g. drains passing through multiple properties), or to what degree it covers water courses discharging into water or artificial watercourses and drains at the point of discharge into a receiving water body.</li> <li>• Clause causes uncertainty in how rule is applied, and part of it not directly relevant to rule.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 102</i>		<ul style="list-style-type: none"> <li>• Practical and workable alternatives, solutions and suggestions.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 102</i>		<ul style="list-style-type: none"> <li>• Regionally Significant Wetlands need to be protected from changes to their water levels.</li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 102</i>		<ul style="list-style-type: none"> <li>• Operation relies on natural streams for continuing viability.</li> <li>• Plan change has huge impact on farming business.</li> <li>• Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 102</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 278 ref. 102</i>		<ul style="list-style-type: none"> <li>• Regionally significant wetlands need to be protected from changes to their water levels.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 102</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 102</i>		<ul style="list-style-type: none"> <li>• Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</li> <li>• Effects-based approach should allow for discharges that exceed Schedule 16 limits.</li> </ul>
<i>Clydevale Dairy Farms Ltd</i>	297	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> <li>• Unclear how limits in Schedule 16 relate to environmental effects.</li> </ul>
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			
The Director-General of	306	Support	Retain as publicly notified.	<ul style="list-style-type: none"> <li>• Gives effect to RMA S 30(1)(c)(iia).</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<b>Conservation</b>				
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• No evidence from environmental impacts from agricultural activities.</li> <li>• Changes are vague, unclear and open-ended.</li> <li>• No need for further restrictions on discharges.</li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Would impact on farming operation.</li> <li>• Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>• Costs of the proposed changes outweigh the benefits.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052			
<i>Hawkdun Station</i>	1053			
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 102</i>		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>
Clutha District Council	308	Oppose	Oppose in part.	<ul style="list-style-type: none"> <li>• Agrees that RSWs need to be carefully managed.</li> <li>• Not clear how Schedule 16 limits are related to environmental effects.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 102</i>		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 102</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 308 ref. 102</i>		<ul style="list-style-type: none"> <li>• Agree rules should be clear and provide for circumstances where schedule 16 cannot be complied with.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 308 ref. 102</i>		<ul style="list-style-type: none"> <li>• Need clarity as to how limits relate to effects.</li> <li>• Difficulties in achieving and reasonableness.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 102</i>		<ul style="list-style-type: none"> <li>• Seek that the submission be allowed and the Plan Change amended as per the submission.</li> </ul>
Central Otago District Council & Clutha District Council	309	Oppose	Provision for reasonable mixing for discharges under this rule should be incorporated so the rule is consistent with the Act.	<ul style="list-style-type: none"> <li>• Agrees that RSWs need to be carefully managed.</li> <li>• Not clear how Schedule 16 limits are related to environmental effects.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 309 ref. 102</i>		<ul style="list-style-type: none"> <li>• Schedule 16 limits do not provide for reasonable mixing.</li> <li>• Supports a revision of limits based on a robust Section 32 report, and consistent with the RMA.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 102</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 102</i>		<ul style="list-style-type: none"> <li>• Support that changes prevent effects of discharges being assessed on case by case basis.</li> <li>• Agree prohibited status should be removed.</li> <li>• Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable.</li> <li>• Support that reasonable mixing be provided for.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 309 ref. 102</i>		<ul style="list-style-type: none"> <li>• Should be reasonable mixing provision to ensure achievability.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 102</i>		<ul style="list-style-type: none"> <li>• Seek that the submission be allowed and the Plan Change amended as per the submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being</i>	1074	<i>Support in part</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of "good quality water" and "natural and</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>partners of the Dairy Farms Partnership</i>		<i>submission 309 ref. 102</i>		<i>human use values", particularly that this includes farming and related rural activities.</i> <ul style="list-style-type: none"> <li><i>Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</i></li> </ul>
Glen Dene Limited	310	Oppose	Oppose in part.	<ul style="list-style-type: none"> <li>Agrees that RSWs need to be carefully managed.</li> <li>Not clear how Schedule 16 limits are related to environmental effects.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submissions 310 - 326 ref. 102</i>		<ul style="list-style-type: none"> <li><i>Need clarity as to how limits relate to effects.</i></li> <li><i>Difficulties in achieving and reasonableness.</i></li> </ul>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 323 ref. 102</i>		<ul style="list-style-type: none"> <li><i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 326 ref. 102</i>		<ul style="list-style-type: none"> <li><i>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</i></li> </ul>

### 103 Rule 12.C.1.6 - Dams and water supply systems permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Three Creeks Farm Ltd	56	Amend	Oppose (e) and (f).	<ul style="list-style-type: none"> <li>Shifting to spray irrigation from border dyke would affect water feeding wetland (Te Hua Taki Wetland).</li> <li>Changing to spray irrigation would lose tree shelter and affect bird life.</li> </ul>
<i>Albert McTainsh</i>	<i>1004</i>	<i>Support submission 56 ref. 103</i>		<ul style="list-style-type: none"> <li><i>Rule is unscientific, uncertain and unworkable.</i></li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Amend	Should all be permitted. (a) should be deleted.	<ul style="list-style-type: none"> <li>Repair and maintenance of irrigation systems.</li> <li>Serious implications for our irrigation scheme.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 70 ref. 103</i>		<ul style="list-style-type: none"> <li><i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i></li> <li><i>Farmers may not know if they are complying or not at a particular time.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• More technical robustness needed.</li> <li>• Need provision for reasonable mixing.</li> </ul>
Teviot Irrigation Company Limited	114	Amend	Amend Condition (e) to allow runoff water to be transported via races from one property to another with owner's consent.	<ul style="list-style-type: none"> <li>• Proposed (e) prevents efficient irrigation operation picking up runoff and keeping discharges out of natural waterways.</li> <li>• Use of property boundaries inappropriate to schemes supplying 100 different types of irrigation operation.</li> <li>• Teviot Irrigation Scheme won't be able to operate.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 114 ref. 103		<ul style="list-style-type: none"> <li>• Must consider existing activities.</li> <li>• Further consultation with affected groups required.</li> </ul>
The Cow Farm Limited	133	Amend	Amend the rule to provide a clear definition of appropriate terminology.	<ul style="list-style-type: none"> <li>• The term "water supply transport system" undefined and unclear.</li> </ul>
Dairy NZ Limited	146	Amend	Include a definition of "water supply transport system"	<ul style="list-style-type: none"> <li>• Term not defined.</li> </ul>
<i>TrustPower</i>	1059	Support submission 146 ref. 103		<ul style="list-style-type: none"> <li>• Not clear whether hydro structures are covered under Section 12.B or Section 12.C.</li> <li>• In original submission, Trustpower suggested retaining existing rules 12.12.11 and 12.12.12 to provide for hydro structures.</li> </ul>
<i>Alliance Group Limited</i>	1060	Support submission 146 ref. 103		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Support in part submission 146 ref. 103		<ul style="list-style-type: none"> <li>• Need for provision in the transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge standards.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose in part submission 146 ref. 103		<ul style="list-style-type: none"> <li>• Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</li> </ul>
Pioneer Generation	147	Amend	<p>That the Rules under 12.C governing the discharge of contaminants to water from dams are better linked, such that (i) the relationship between Rule 12.C.1.6 and the other rules listed under Section 12.C are clearly defined, and that (ii) any non-compliance with Rule 12.C.1.6 is clearly linked to a supporting rule that provides for the discharge as a controlled activity.</p> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment set out above.</p>	<ul style="list-style-type: none"> <li>• Deletion of rules 12.12.1.1 and 12.12.2.1 may result in hydropower being caught by new 12.C provisions.</li> <li>• Activity status not clear.</li> <li>• Needs more transparent link between rules and activity classifications.</li> <li>• Discharges from dams to be controlled activity.</li> </ul>
<i>Contact Energy Limited</i>	1013	Support submission 147 ref. 103		<ul style="list-style-type: none"> <li>• Reasons stated in the submission.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	Support in part submission 147 ref. 103		<p>There is no reason to limit the application of the rule to only dams permitted under rule 12.3.2.1. The rule should apply to any dam. The situation is adequately protected by paragraphs (b) and (c).</p>
<i>TrustPower</i>	1059	Support submission 147 ref. 103		<ul style="list-style-type: none"> <li>• Not clear whether hydro structures are covered under Section 12.B or Section 12.C.</li> <li>• In original submission, Trustpower suggested retaining existing rules 12.12.11 and 12.12.12 to provide for hydro structures.</li> </ul>
J R Hill	178	Amend	To allow water to be used in this way [runoff is used to irrigate at different levels, through water races].	<ul style="list-style-type: none"> <li>• Is an irrigator on a company scheme, use runoff water for further irrigation through races.</li> <li>• Has been occurring for many years.</li> <li>• Encourage the continued efficient (re)use of water.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	Retain rule as currently drafted.	• Supports rule.
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 103</i>		• <i>Not clear whether hydro structures are covered under Section 12.B or Section 12.C.</i> • <i>In original submission, Trustpower suggested retaining existing rules 12.12.11 and 12.12.12 to provide for hydro structures.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 103</i>		• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 103</i>		• <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
Trustpower Limited	206	Amend	Retain existing Rule 12.12.1.1 and the associated principal reasons for adopting, and amend Proposed Rule 12.C.1.6 as follows: "12.C.1.6 The discharge of water or contaminants listed in Schedule 16 from: (i) a dam or diversion; or (ii) water supply transport system, to water, or to a Regionally Significant Wetland, is a permitted activity, providing: (a) There is no discharge of water from one catchment to another; and (b) The dam is not used for the storage of contaminants; and (c) The presence of contaminants does not result from the damming activity or the activities of the dam operator; and (d) The presence of contaminants does not result from the water transporting activity, or the activities of the water transporter; and (e) The water supply transport system does not convey irrigation runoff; and  That existing Rule 12.12.1.2 should be retained, and if Rule 12.12.1.1 is to be replaced by Rule 12.C.1.6 it should apply to all discharges from dams and diversions, rather than only to those from dams that are permitted.  That regard should be had to the existing explanatory text in Section 12.12 of the Plan.	<ul style="list-style-type: none"> <li>• Rule only applies to permitted activities. Should apply to dams.</li> <li>• Trustpowers' operations do not typically alter the quality of the water received.</li> <li>• Existing conditions in Rules 12.12.1.1, 12.12.1.2 should be provided for.</li> <li>• Discharges from a diversion to be provided for, as similar to those from dams.</li> <li>• It is cumbersome to submit on the inclusion of Condition (f) outside of the context of Plan Change 2.</li> <li>• Condition (f) doesn't meet requirements of permitted activity standard.</li> <li>• Explanatory text of existing rules 12.12 recognises characteristics of, and discharges from, dams and hydro-electric facilities.</li> <li>• Agrees with these explanations and opposes their deletion.</li> <li>• Existing structure gives effect to NPS for Renewable Energy Generation.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 103</i>		• <i>Reasons stated in the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 206 ref. 103</i>		• <i>Inconsistent with relief sought by further submitter.</i>
Kawarau Station Limited	232	Amend	Amend to include definition of water supply transport system.	• To clarify what rule pertains to.
Fonterra Co-operative Group Limited	241	Amend	Include a definition of "water supply transport system"	• Term not defined.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 241 ref. 103</i>		• <i>Supports clarity about water supply transport system.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 241</i>		• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons</i>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 103</i>		<i>in its original submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
North Otago Irrigation Company	260	Amend	Remove 12.C.1.6(e).	<ul style="list-style-type: none"> <li>• How are farmers to manage irrigation run-off without conveying it within a 'water supply transport system' - they must be able to manage irrigation run-off sensibly and responsibly.</li> </ul>
<i>Isa Holdings Ltd</i>	1058	<i>Support submission 260 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Amendment would support farmers to meet the rules and increase water use efficiency.</i></li> <li>• <i>Recognises border-dyke irrigation method.</i></li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i></li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Support the NOIC submission in full.</i></li> </ul>
Colin Scurr	268	Amend	Amend	<ul style="list-style-type: none"> <li>• Regionally Significant Wetlands need to be carefully managed.</li> <li>• Not clear how limits are related to environmental effects.</li> </ul>
Horticulture New Zealand	269	Amend	Amend Rule 12.C.1.6 f) as follows: "There are no more than minor effects to the water level or hydrological function..." Delete ii) Water supply transport system and conditions d) and e)	<ul style="list-style-type: none"> <li>• Almost impossible to meet. Any discharge is likely to cause a degree of change.</li> <li>• No definition of the term 'water supply transport system'.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support in part submission 269 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Supports the submission on 12.C.1.6(f).</i></li> <li>• <i>Reasons stated in the submission.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Measurement process to establish N level/ha unworkable.</i></li> <li>• <i>Landuse management not the ORC's role.</i></li> <li>• <i>Cost to implement the plan change will be huge.</i></li> <li>• <i>If there is valid need to restrict N usage in specific areas this should be developed in consultation with land users and sectors, not by imposition.</i></li> </ul>
Forest and Bird	271	Support	Retain as publicly notified.	<ul style="list-style-type: none"> <li>• Rule is appropriate and gives effect to RMA.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 103</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> </ul>
<i>Mr RJ Borst</i>	1034			
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
TrustPower	1059	Oppose submission 271 ref. 103		<ul style="list-style-type: none"> <li>• Not clear whether hydro structures are covered under Section 12.B or Section 12.C.</li> <li>• In original submission, Trustpower suggested retaining existing rules 12.12.11 and 12.12.12 to provide for hydro structures.</li> </ul>
Alliance Group Limited	1060	Oppose submission 271 ref. 103		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 271 ref. 103		<ul style="list-style-type: none"> <li>• Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 271 ref. 103		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Federated Farmers of New Zealand	278	Amend	Adopt the rule but provide for the storage of water applied for the purposes of irrigation and the application that water subject to the rules in the plan and the site standards of Rule 12.C.1.6.	<ul style="list-style-type: none"> <li>• Support permitted approach.</li> <li>• Provision needed for innovation around flood-based irrigation systems and the reapplication of that water to land.</li> </ul>
Albert McTainsh	1004	Support submission 278 ref. 103		<ul style="list-style-type: none"> <li>• Practical and workable alternatives, solutions and suggestions.</li> </ul>
Forest and Bird NZ	1007	Oppose submission 278 ref. 103		<ul style="list-style-type: none"> <li>• This rule may not include standards that are appropriate for innovative flood-based schemes.</li> </ul>
Hopfield Investments Ltd	1019	Support submission 278 ref. 103		<ul style="list-style-type: none"> <li>• Operation relies on natural streams for continuing viability.</li> <li>• Plan change has huge impact on farming business.</li> <li>• Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
Strath Taieri Community Board	1029	Support submission 278 ref. 103		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Waitaki Irrigators Collective Limited	1031	Support submission 278 ref. 103		<ul style="list-style-type: none"> <li>• Sustainable way to manage run-off, contaminant discharges and increase water use efficiency.</li> <li>• Rules that provide for this should be encouraged.</li> <li>• Would also allow border-dyke irrigation to continue.</li> </ul>
Isa Holdings Ltd	1058	Support submission 278 ref. 103		<ul style="list-style-type: none"> <li>• Amendment would support farmers to meet the rules and increase water use efficiency.</li> <li>• Recognises border-dyke irrigation method.</li> </ul>
TrustPower	1059	Oppose submission 278 ref. 103		<ul style="list-style-type: none"> <li>• Not clear whether hydro structures are covered under Section 12.B or Section 12.C.</li> <li>• In original submission, Trustpower suggested retaining existing rules 12.12.11 and 12.12.12 to provide for hydro structures.</li> </ul>
North Otago Irrigation Company	1061	Support submission 278 ref. 103		<ul style="list-style-type: none"> <li>• ORC must give farmers the tools to mitigate/control contaminants. Ability to install small capture dams is a key mechanism to prevent transfer of nutrients. Requests ORC review position on capture dams.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 103</i>		<ul style="list-style-type: none"> <li>• To support farmers meeting the rules and increasing water use efficiency.</li> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 103</i>		<ul style="list-style-type: none"> <li>• Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</li> <li>• Effects-based approach should allow for discharges that exceed Schedule 16 limits.</li> </ul>
<i>Clydevale Dairy Farms Ltd</i>	297	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> <li>• Unclear how limits in Schedule 16 relate to environmental effects.</li> </ul>
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			
The Director-General of Conservation	306	Amend	That 12.C.1.6 be amended as follows, or to like effect: Notwithstanding Rules 12.C.1.1, 12.C.1.2 and 12.C.1.5, the discharges of water or the concentration of contaminants listed in Schedule 16 from: ...	<ul style="list-style-type: none"> <li>• Contaminants in Schedule 16 are described by concentration and this needs to be reflected.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 103</i>		<ul style="list-style-type: none"> <li>• No evidence from environmental impacts from agricultural activities.</li> <li>• Changes are vague, unclear and open-ended.</li> <li>• No need for further restrictions on discharges.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 103</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 103</i>		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 103</i>		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant</li> </ul>
<i>Hawkdun Station</i>	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<p>provisions as notified.</p> <ul style="list-style-type: none"> <li>Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>Shouldn't restrict necessary farming discharges.</li> <li>No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 103		<ul style="list-style-type: none"> <li>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
Alliance Group Limited	1060	Oppose submission 306 ref. 103		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 103		<ul style="list-style-type: none"> <li>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 103		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 103		<ul style="list-style-type: none"> <li>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>Rules fail relevant tests under section 32 RMA.</li> <li>Additional controls not justified in terms of effects.</li> <li>Seek the submission be disallowed.</li> </ul>
Clutha District Council	308	Oppose	Oppose in part.	<ul style="list-style-type: none"> <li>Agrees that RSWs need to be carefully managed.</li> <li>Not clear how the Schedule 16 limits are related to environmental effects.</li> </ul>
Dunedin City Council	1025	Support submission 308 ref. 103		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
Strath Taieri Community Board	1029	Support submission 308 ref. 103		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Central Otago Wine Growers Association	1054	Support submission 308 ref. 103		<ul style="list-style-type: none"> <li>Agree rules should be clear and provide for circumstances where schedule 16 cannot be complied with.</li> </ul>
Federated Farmers of New Zealand	1057	Support in part submission 308 ref. 103		<ul style="list-style-type: none"> <li>Need clarity as to how limits relate to effects.</li> <li>Difficulties in achieving and reasonableness.</li> </ul>
The NZ Transport Agency	1073	Support submission 308 ref. 103		<ul style="list-style-type: none"> <li>Seek that the submission be allowed and the Plan Change amended as per the submission.</li> </ul>
Glen Dene Limited	310	Oppose	Oppose in part.	<ul style="list-style-type: none"> <li>Agrees that RSWs need to be carefully managed.</li> <li>Not clear how the Schedule 16 limits are related to environmental effects.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy	317			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Limited				
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	Support submissions 310 - 326 ref. 103		<ul style="list-style-type: none"> <li>• Need clarity as to how limits relate to effects.</li> <li>• Difficulties in achieving and reasonableness.</li> </ul>
<i>Alliance Group Limited</i>	1060	Support submission 323 ref. 103		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	Support in part submission 326 ref. 103		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

#### 104 Rule 12.C.2.1 - Contaminants restricted discretionary

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Stephen Cole	8	Oppose	Remove rule providing a narrow consenting option for discharges that do not meet specified limits.	<ul style="list-style-type: none"> <li>• Open to abuse, defeats rules for good quality water, affects fishing, tourism, pleasure.</li> </ul>
<i>Horticulture New Zealand</i>	1032	Oppose submission 8 ref. 104		<ul style="list-style-type: none"> <li>• Needs to be a rule which provides for assessment of effects.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Oppose submission 8 ref. 104		<ul style="list-style-type: none"> <li>• Appropriate for consent to be accessible, ensures consistency with RMA.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 8 ref. 104		<ul style="list-style-type: none"> <li>• Proposed consent option is overly restrictive and contrary to RMA principles.</li> <li>• Proposed changes are disproportionate when applied to existing farming operations.</li> </ul>
Hopefield Investments Ltd (C Cochrane)	45	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame imposed.	<ul style="list-style-type: none"> <li>• Proposed time frame places inequitable financial burden on pastoral farmers.</li> <li>• Will devalue ORC's primary sector rating base.</li> <li>• Inhibit development and enhancement of resources unless financial assistance granted to landholders.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 45 ref. 104		<ul style="list-style-type: none"> <li>• Concerns with workability.</li> <li>• Despite precautions may still breach rules, making scheme unworkable with financial costs.</li> </ul>
Marianne & Michael Parks	51	Did not specify	A key development we would like to see implemented that would have a key influence on meeting the targets set in this rule [12.C.2.1] include: ... Meeting the standards within this rule are able to managed through good management of the waterway.	<ul style="list-style-type: none"> <li>• ORC management of Pomahaka River at Kelso.</li> <li>• Lack of gravel extraction causing erosion, tons of soil entering waterway smothering native fish.</li> <li>• Want to see ORC's management plans of waterways.</li> <li>• ORC needs to be active in solution of effective management of waterways.</li> </ul>
Three Creeks Farm Ltd	56	Oppose	Seek to delete this from the plan.	<ul style="list-style-type: none"> <li>• It is uncertain.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Measurement difficult.</li> <li>• Even if could measure, probably impossible to comply with Schedule 16.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 56 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Rule is unscientific, uncertain and unworkable.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 56 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Farmers must be allowed to take into account local environmental conditions and economic/development consideration.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 56 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
Glenayr Ltd (D & D Sangster)	59	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Don't think x hours after rain will always apply.</li> <li>• Discharge can be caused by events other than rain, e.g. snow melt.</li> <li>• Not wanting to be responsible for neighbouring dairying discharges.</li> <li>• How practical it is for measuring discharge before it enters water.</li> <li>• Currently border dyke and expensive to convert, lead in time needed.</li> </ul>
Providence Farm 2007 Ltd	64	Oppose	Seek to delete this from the plan.	<ul style="list-style-type: none"> <li>• Rule uncertain, measurement difficult.</li> <li>• Impossible to comply with Schedule 16 limits.</li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Oppose	Should all be permitted.	<ul style="list-style-type: none"> <li>• Repair and maintenance of irrigation systems.</li> <li>• Sky the limit, open to bureaucratic abuse.</li> </ul>
Loganbrae Ltd	75	Oppose	Don't think x hours after rain will always apply. Not practical to measure discharges. Lead in time needed to change from border dyking.	<ul style="list-style-type: none"> <li>• Not practical to measure discharges.</li> <li>• Discharge can be caused by events other than rain e.g. Snow melt on neighbouring properties, run off from gravel roads. Have no control over these discharges and don't feel responsible for them.</li> <li>• Not wanting to be responsible for neighbouring dairying discharges.</li> </ul>
Glen Ayr Ltd (D & C Dundass)	76	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Not practical to measure discharges.</li> <li>• Discharge can be caused by events other than rain e.g. Snow melt on neighbouring properties, run off from gravel roads. Have no control over these discharges and don't feel responsible for them.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 76 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Too difficult to quantify and apportion responsibility.</i></li> <li>• <i>Lack of scientific basis makes it unworkable.</i></li> </ul>
Cross Family Trusts	77	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame imposed.	<ul style="list-style-type: none"> <li>• Proposed timeframe for change places inequitable financial burden upon pastoral farmers.</li> <li>• Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources.</li> </ul>
Isbister Farms Limited	123	Oppose	Oppose rule 12.C.2.1 and seeks its deletion.	<ul style="list-style-type: none"> <li>• Rule uncertain, measurement difficult.</li> <li>• Extremely difficult to comply with Schedule 16 limits for Kakanui and Kauru Rivers.</li> </ul>
Finlay Family Trust	125	Amend	Delete 10 & 30 kg/ha nitrogen.	<ul style="list-style-type: none"> <li>• Uncertain, measurement difficult.</li> <li>• Even if possible to measure, N loading limits unrealistic.</li> <li>• Contrary to RMA and ORC objectives to set limits in sustainable way.</li> <li>• Based on a model not yet tested and peer-reviewed.</li> <li>• Ignore the different regions and farming systems.</li> <li>• Not enough time has been given for researched submission and a truly consultative basis.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 125 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Measures not realistic and don't account for differing regions and systems.</i></li> <li>• <i>Farmers may breach limits despite taking precautions.</i></li> </ul>
The Cow Farm Limited	133	Amend	The rule should be amended to be consistent with Policy 7.D.3.	<ul style="list-style-type: none"> <li>• Item (b) directly conflicts with Policy 7.D.3.</li> <li>• Contaminants may exceed the limits but this does not mean an adverse effect</li> </ul>

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				will result.
M B & J A Mitchell	134	Amend	These proposals should be delayed till there is much better understanding of these issues.	<ul style="list-style-type: none"> <li>A lot unknown about different fertilisers and what benefit or uptake by plants.</li> </ul>
Otago Conservation Board	140	Amend	Matters of discretion listed under Rule 12.C.2.1 need to recognise that a discharge to land that is greater than the allowed standard may prove a better solution than discharge to water.	<ul style="list-style-type: none"> <li>The proposed change could lead to the deterioration of water quality in Otago.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 140 ref. 104</i>		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose in part submission 140 ref. 104</i>		<ul style="list-style-type: none"> <li>Not all waterways in Otago should be protected or enhanced. Many are affected by activities other than farming.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
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<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 140 ref. 104</i>		<ul style="list-style-type: none"> <li>Schedule 16 does not take into account local environmental conditions and economic/development consideration.</li> <li>Schedule 16 is disproportionate and overly restrictive.</li> </ul>
New Zealand Pork Industry Board	145	Amend	<p>Amend 12.C.2.1 (i) to state: "Where changes to land management or infrastructure have been unsuccessful in meeting the limits in Schedule 16 or Rule 12.C.1.3, and the discharge first occurred prior to March 2012; or..."</p> <p>Retain the following statement as proposed: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule".</p> <p>Amend glossary to define what is meant by "short-term".</p>	<ul style="list-style-type: none"> <li>Leaching of N outside rate defined in Rule 12.C.1.3 should be made restricted discretionary if discharge first occurred prior to 31 March 2012.</li> <li>Some industries cannot model N leaching using OVERSEER are unable to determine compliance.</li> </ul>
Dairy NZ Limited	146	Oppose	<p>Delete this rule and replace it with a permitted activity rule.</p> <p>Change the wording of clause (i) to make it clear that this would only apply to discharges that were legally authorised prior to 31 March 2012.</p>	<ul style="list-style-type: none"> <li>Rule more effective and efficient if permitted activity.</li> <li>Not appropriate for unauthorised discharge to be restricted discretionary and have notification precluded.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 104</i>		<ul style="list-style-type: none"> <li>• Lesser activity status more efficient and effective.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 104</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 146 ref. 104</i>		<ul style="list-style-type: none"> <li>• Support the proposed activity status to reflect the potential effects of land use activities on water quality.</li> <li>• A change of wording to make it clear the rule applies to authorised discharges is supported.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 104</i>		<ul style="list-style-type: none"> <li>• Need for provision in the transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge standards.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 104</i>		<ul style="list-style-type: none"> <li>• Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</li> </ul>
Trust for the estate of W J Johnston	152	Oppose	Oppose section 12.C.2.1 and seek its deletion.	<ul style="list-style-type: none"> <li>• Rule uncertain, measurement difficult.</li> <li>• Discharge influenced by upstream factors.</li> <li>• Very difficult to comply with limits in Schedule 16 for Kakanui and Kauru rivers.</li> </ul>
Sam Kane	161	Oppose	Delete.	<ul style="list-style-type: none"> <li>• Insufficient science-based evidence to support limits.</li> <li>• No framework for holistically assessing cumulative impact, and what is an appropriate individual and collective discharge level that balances environmental, social and economic needs.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	<p>For the matters over which council will restrict its discretion for Rule 12.C.2.1 be amended to include a additional matter, respectively: (l) Any effect on Tangata Whenua values.</p> <p>AND</p> <p>The note to the rule to be amended as follows: The Consent Authority may preclude public notification . . .</p>	<ul style="list-style-type: none"> <li>• Supports rule, but extra matter needed to give effect to Objective D1 and Policy D1 of NPSFW.</li> <li>• Could be circumstances when notification is appropriate due to scale and/or significance of activity.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 197 ref. 104</i>		<ul style="list-style-type: none"> <li>• Gives effect to the RMA.</li> <li>• Recognises potential public interest in the use of the regions public resources.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 104</i>		<ul style="list-style-type: none"> <li>• Introducing tangata whenua values may preclude the effective application of the rule: extending timeframe for compliance may conflict with tangata whenua values, but may be required by circumstances.</li> <li>• This rule will be most effective when exercised by the ORC at their sole discretion, without public participation after considering the specified matters.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 104</i>		<ul style="list-style-type: none"> <li>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 104</i>		<ul style="list-style-type: none"> <li>• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</li> </ul>
Hopefield Investments Ltd (R Griffiths)	200	Oppose	<p>Adequate time for rational debate on the regional and national implications of Plan Change 6A.</p> <p>Extension of the proposed time frame to permit of 1 above.</p>	<ul style="list-style-type: none"> <li>• Costs associated with compliance.</li> <li>• Proposed time frames insufficient.</li> <li>• Unknown implementation management of changes by ORC.</li> </ul>
<i>Federated Farmers of New</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> <li>• Concerns with implications of plan change on farming and flow-on effects to</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 200 ref. 104</i>		<i>region.</i> <ul style="list-style-type: none"> <li>• Lack of scientific basis for limits and decisions.</li> <li>• Lack of clarity around implementation and achievability of standards and limits.</li> </ul>
Trustpower Limited	206	Amend	Amend the proposed rule as follows: "For any activity that is not classified as a permitted activity under section 12.C.1, the discharge of contaminants listed in Schedule 16 to land."	<ul style="list-style-type: none"> <li>• Unclear how rules work together</li> <li>• Rule should apply only after permitted rules exhausted.</li> </ul>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support submission 206 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Reasons stated in the submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose in part submission 206 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Inconsistent with relief sought by further submitter.</i></li> </ul>
Lakes Landcare	210	Amend	Modify/change.	<ul style="list-style-type: none"> <li>• Standards imposed are too stringent</li> <li>• Based on data from major river not all tributaries.</li> </ul>
Willowview Pastures Ltd	214	Oppose	Seek its deletion.	<ul style="list-style-type: none"> <li>• Measurement is difficult.</li> <li>• Rule is uncertain.</li> <li>• Probably impossible to comply with limits in Schedule 16.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 214 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Despite taking precautions farmers may breach rules.</i></li> <li>• <i>Impractical with significant costs to those affected.</i></li> </ul>
Alan Grant Macgregor	215	Oppose	Deletion of this rule.	<ul style="list-style-type: none"> <li>• Rule is uncertain.</li> <li>• Measurement is difficult, which limits effective monitoring.</li> <li>• Compliance with limits is likely to be impossible.</li> <li>• Poor approach to formation of the proposed plan with minimal consultation.</li> <li>• Minimal time given to make informed and researched submission.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 215 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Despite taking precautions farmers may breach rules.</i></li> <li>• <i>Impractical with significant costs to those affected.</i></li> </ul>
Michael O'Connor	234	Oppose	Change to suit type and level of farming that now exists and to allow for future change of land use to occur as it does at present.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Fonterra Co-operative Group Limited	241	Oppose	Delete this rule and replace it with a permitted activity rule.  Change the wording of clause (i) to make it clear that this would only apply to discharges that were legally authorised prior to 31 March 2012.	<ul style="list-style-type: none"> <li>• Rule more effective and efficient if permitted activity.</li> <li>• Not appropriate for unauthorised discharge to be restricted discretionary and have notification precluded.</li> </ul>
<i>Forest and Bird NZ</i>	<i>1007</i>	<i>Oppose submission 241 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Rule should discretionary with provision for public notification, not a permitted activity rule.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 241 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Permitted status appropriate.</i></li> <li>• <i>Despite taking precautions farmers may breach rules.</i></li> </ul>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 241 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose in part submission 241 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Support the proposed activity status to reflect the potential effects of land use activities on water quality. A change of wording to make it clear the rule applies to authorised discharges is supported.</i></li> </ul>
Viewmont Limited	247	Oppose	Deletion of this rule.	<ul style="list-style-type: none"> <li>• Rule is uncertain</li> <li>• Complex measurement limits the ability for effective monitoring.</li> </ul>

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Ravensdown Fertiliser Co-operative Ltd	248	Oppose	Opposes rule as currently written and seeks clarity of activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 cannot be met.	<ul style="list-style-type: none"> <li>Likely meeting limits is impossible which will impact farming.</li> <li>Not clear what criteria will be used to decide eligibility under this rule.</li> <li>Unclear what activity status is for post 31 March 2012 discharges which don't meet limits.</li> <li>Concerns raised elsewhere about Schedule 16 need to be addressed.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 248 ref. 104</i>		<ul style="list-style-type: none"> <li>For reasons given by the submitter.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 104</i>		<ul style="list-style-type: none"> <li>Rules need to be clear and unambiguous.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Support submission 248 ref. 104</i>		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Waihemo Water Catchment Society Inc	250	Oppose	Delete.	<ul style="list-style-type: none"> <li>Impossible to measure and define where contaminants came from.</li> <li>Insufficient time allowed for researching these planned changes and proposals.</li> </ul>
Meridian Energy Limited	251	Amend	<p>Clarify the meaning of "short-term activity" and ensure that discharges associated with construction activities are captured by its meaning.</p> <p>Clarify the meaning of "short-term adverse effect", and ensure that effects during construction and rehabilitating periods are captured by the meaning.</p>	<ul style="list-style-type: none"> <li>No definition or guidance re what is a short term activity or adverse effect</li> <li>No explanation about how rule sits with surrounding structure.</li> <li>No explanation whether rule is stand alone or whether permitteds or prohibitions need to be considered first.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 251 ref. 104</i>		<ul style="list-style-type: none"> <li>Reasons stated in the submission.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 251 ref. 104</i>		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
New Zealand Fertiliser Manufacturers Research Association Inc	252	Oppose	Opposes the rule as currently written and seeks clarity of activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 cannot be met.	<ul style="list-style-type: none"> <li>• Not clear what criteria will be used to decide eligibility under this rule.</li> <li>• Unclear what activity status is for post 31 March 2012 discharges which don't meet limits.</li> <li>• Concerns raised elsewhere about Schedule 16 need to be addressed.</li> </ul>
<i>Mr RJ Borst</i>	1034	Support submission 252 ref. 104		<ul style="list-style-type: none"> <li>• Rules need to be clear and unambiguous.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
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<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Queenstown Lakes District Council	255	Amend	Amend the matters of discretion listed under Rule 12.C.2.1 to recognise that discharge to land that exceeds limits could be a better alternative than a discharge to water.	<ul style="list-style-type: none"> <li>• May prove to be better and workable solution.</li> </ul>
<i>Dunedin City Council</i>	1025	Support submission 255 ref. 104		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
<i>Clutha District Council</i>	1050	Support in part submission 255 ref. 104		<ul style="list-style-type: none"> <li>• Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects.</li> <li>• Further clarity is needed.</li> <li>• PC6A should be withdrawn if concerns are not addressed.</li> <li>• Too complex for landowners.</li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>The NZ Transport Agency</i>	1073	Support submission 255 ref. 104		<ul style="list-style-type: none"> <li>• Recognition Schedules 15 and 16 don't accurately reflect variations between water bodies.</li> <li>• Agreed that allowance for appropriate mixing zones should be included.</li> <li>• Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</li> <li>• Seeks the submission be allowed and the plan change be amended as per the submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 255 ref. 104		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
B & J Smith	259	Oppose	Seek deletion of this rule until which time that extensive practical monitoring has taken place over a longer period of time.	<ul style="list-style-type: none"> <li>• Overriding, generic and impracticable nature of rule.</li> <li>• Absence of practical monitoring, peer reviewed, and scientifically sound</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>Work needs to be facilitated by a neutral third party and be intensively peer-reviewed, in order for Council to make a sound and reasoned judgement on it.</p> <p>Seasonal and annual variations need to be taken into account, especially in those areas that experience vast variations in rainfall and climatic conditions within any given season.</p>	reasoning.
North Otago Irrigation Company	260	Amend	<p>This rule gives a short-term consenting option for the discharge of contaminants to land where applicants have been unable to meet the discharge limits within the timeframe specified. Request that this principle is extended to include restricted discretionary activities for the discharge of contaminants to water and the discharge of water containing contaminants to water.</p> <p>Remove the requirement for a discharge to have first occurred prior to 31 March 2012.</p>	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 260 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Difficult to determine where discharges took place and impact of them.</i></li> <li>• <i>Time bound provision should be deleted.</i></li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i></li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Support the NOIC submission in full.</i></li> </ul>
Ballance Agri-Nutrients Ltd	262	Oppose	<p>Opposes the rule as currently written and seeks clarity of activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 cannot be met.</p>	<ul style="list-style-type: none"> <li>• Not clear what criteria will be used to decide eligibility under this rule.</li> <li>• Unclear what activity status is for post 31 March 2012 discharges which don't meet the limits.</li> <li>• Concerns raised elsewhere about Schedule 16 need to be addressed.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Rules need to be clear and unambiguous.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	<p>Amend Rule 12.C.2 - Restricted Discretionary activities to provide that the discharge of contaminants listed in Schedule 16 to land where the discharge first occurred prior to 31 March 2012 is a controlled activity that will not be publicly notified. In granting a resource consent for existing discharges, insert the following criteria: Council will restrict the exercise of its control to the following matters:</p> <p>(a) Any adverse effects on water quality, including cumulative effects;</p> <p>(b) How discharge limits in section 16 will be achieved within a set timeframe, including any quality management practices to be implemented;</p> <p>(c) Any adverse effects on any Regionally Significant Wetland or on any regionally significant wetland value;</p> <p>(d) Any adverse erosion, land stability or sedimentation effects or property damage resulting from the discharge;</p> <p>(e) Any financial contribution for any Regionally Significant Wetland or on any regionally significant wetland value;</p> <p>(f) The information and monitoring requirements;</p> <p>(g) The duration of the resource consent; and</p> <p>(h) The review of conditions of the resource consent.</p>	<ul style="list-style-type: none"> <li>• The proposed permitted and prohibited activity approach is overly restrictive, and rule is contrary to good resource management practice and the purpose and principles of the RMA.</li> <li>• Existing discharges should be given some protection.</li> <li>• Meeting discharge limits will require change in practice and increased costs for farmers.</li> <li>• Assurance should be given that resource consent will be granted if discharge limits can't be met by required date.</li> </ul>
Environmental Defence Society	267	Amend	To amend the rules so that they are discretionary activities, and that the consent authority is not precluded from giving public notification of an application for resource consent for such activities.	<ul style="list-style-type: none"> <li>• Matters of discretion fail to list important factors e.g. actual or potential effects on aquatic ecosystems, indigenous species and recreational activities.</li> <li>• Should not be a rule precluding public notification due to public interest in water quality.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 267 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Discretionary status is more appropriate.</i></li> <li>• <i>Public notification should be the default position.</i></li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 267 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>If additional matters of discretion are required they should be added rather than changing the activity status.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose in part submission 267 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Oppose suggestion all applications for resource consent should be publicly notified.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Oppose submission 267 ref. 104		<ul style="list-style-type: none"> <li>Restricted discretionary status more appropriate and public notification should be precluded.</li> </ul>
Alliance Group Limited	1060	Oppose submission 267 ref. 104		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 267 ref. 104		<ul style="list-style-type: none"> <li>Oppose submission in that it supports plan change and use of prohibited activity status.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 267 ref. 104		<ul style="list-style-type: none"> <li>Inconsistent with relief sought by further submitter.</li> </ul>
Colin Scurr	268	Amend	Rule be amended or new rule provides for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> <li>Assumes Schedule 16 limits can be met in all cases.</li> <li>Not clear how applications that cannot meet Schedule 16 limits will be assessed.</li> <li>Social and economic wellbeing must be considered too.</li> </ul>
Horticulture New Zealand	269	Amend	<p>Amend Rule 12.C.2.1) as follows:  "The discharge of contaminants to land, or to water, or to land where it may enter water that does not meet the permitted activity conditions in Rules 12.C.1.1 - 12.C.1.5 is a restricted discretionary activity.</p> <p>The matters to which Council will restrict its discretion are those permitted activity conditions that the activity did not meet."</p>	<ul style="list-style-type: none"> <li>Should include discharges to water or to land where it may enter water.</li> <li>Should apply to activities that do not meet permitted activity rules 12.C.1.1 - 12.C.1.5.</li> </ul>
Alliance Group Limited	1060	Support submission 269 ref. 104		<ul style="list-style-type: none"> <li>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Etrick Fruitgrowers Association Inc	1067	Support submission 269 ref. 104		<ul style="list-style-type: none"> <li>Measurement process to establish N level/ha unworkable.</li> <li>Landuse management not the ORC's role.</li> <li>Cost to implement the plan change will be huge.</li> <li>If there is valid need to restrict N usage in specific areas this should be developed in consultation with land users and sectors, not by imposition.</li> </ul>
Forest and Bird	271	Amend	<p>Add the following matters;  "Any adverse effects on aquatic life, contact recreation, drinking and stock water."</p> <p>Define "short term".</p> <p>Delete (b), (h), (i).</p> <p>Delete:  "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."</p>	<ul style="list-style-type: none"> <li>Potential for short term discharges to have significant adverse effects on ecological, natural, human and stock use of waters.</li> <li>(h) suggest that it may be OK to adversely affect a RSW provided there is a financial contribution.</li> <li>Rule as proposed provides loophole that could be used by industry laggards.</li> <li>Existing discharges that cannot meet Schedule 16 should not be able to apply for non notified restricted discretionary consents.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Add new specifically targeted rule to allow notified discretionary consents to provide for innovation of untried but promising management regimes to be given a year to trial.	
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Current wording of the PP6A is appropriate and necessary.</i></li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Gives effect to the RMA.</i></li> <li>• <i>Recognises potential public interest in the use of the regions public resources.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Notification is not always necessary or appropriate.</i></li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Definition of short term should be available for public submission.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Notification of resource consent applications not always necessary or appropriate.</i></li> <li>• <i>Adds unnecessary delay and cost.</i></li> <li>• <i>Removes Council's discretion to determine when notification is appropriate, and to whom.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Fish and Game (Central South Island)	273	Amend	Clarification on the notification level of restricted discretionary consents under these rule, in particular clarify that Fish and Game	<ul style="list-style-type: none"> <li>• <i>Can only support rule if notification level is for limited notification.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			will be notified as an affected party.	
New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)	1010	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• Not necessary or appropriate to identify a particular party as being affected.</li> <li>• Contrary to the notification of the RMA.</li> </ul>
Craiglea Limited	1012	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• No need to publicly notify each and every resource consent application.</li> </ul>
Mr RJ Borst	1034	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• No need to publicly notify every resource consent application.</li> <li>• Unnecessary delay and cost.</li> <li>• Removes Council discretion to decide when notification is appropriate and to whom.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
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Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Otago Water Resource Users Group	1056	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• This rule will be most effective when exercised by the ORC at their sole discretion, without public participation after considering the specified matters.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• Precluding notification appropriate for the activity status given short term nature of the activity and effect.</li> </ul>
Alliance Group Limited	1060	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
Fonterra Co-operative Group Limited	1068	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• There is no certainty F&amp;G will be an affected party.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 273 ref. 104		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Federated Farmers of New Zealand	278	Amend	<p>Adopt the rule with amendments.</p> <p>Delete the words "and the discharge first occurred prior to March 2012".</p>	<ul style="list-style-type: none"> <li>• Discharges unable to meet permitted Rules 12.C.1.1-12.C.1.6 should default to restricted discretionary consent.</li> <li>• Rule should apply to all discharges.</li> <li>• Difficult to determine commencement, nature and scale of discharges.</li> <li>• Supports provision regarding publicly notifying consents.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Include either in a separate rule or provide in this rule provision for resource consent for all activities permitted under 12.C.1.	
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Practical and workable alternatives, solutions and suggestions.</i></li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Providing for all activities permitted under rule 12.C.1 as restricted discretionary consents would undermine the intent to bring about changes in land management and improve water quality.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Operation relies on natural streams for continuing viability.</i></li> <li>• <i>Plan change has huge impact on farming business.</i></li> <li>• <i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 278 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Providing for all activities permitted under Rule 12.C.1 as restricted discretionary consents would undermine the intent of the plan to bring about changes in land management to improve water quality.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i></li> <li>• <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i></li> <li>• <i>Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</i></li> </ul>
Annie Stuart	280	Amend	<p>Not sure that 'Section 12.C.2 Restricted discretionary activities: Resource consent required' provides adequate protection against practices that will have significant effects in regulating uptake of large quantities of water, discharge of chemically toxic wastewater, and potentially extensive damage to groundwater and underground water supplies.</p> <p>Object to the rider that: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."</p>	<ul style="list-style-type: none"> <li>• <i>Plan change does not reflect pressure on Otago's water with currently proposed mining.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 280 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Proposed level of protection already higher than necessary.</i></li> <li>• <i>Appropriate for no requirement to notify.</i></li> </ul>
Fish and Game (Otago)	287	Amend	Clarification on the notification level of restricted discretionary consents under this rule, in particular clarify that Fish and Game will be notified as an affected party.	<ul style="list-style-type: none"> <li>• <i>Where public notification limited, presumably affected parties still notified.</i></li> <li>• <i>Rule supported only if notification level is for limited notification.</i></li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 287 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Not necessary or appropriate to identify a particular party as being affected.</i></li> <li>• <i>Contrary to the notification of the RMA.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>No need to publicly notify each and every resource consent application.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287</i>		<ul style="list-style-type: none"> <li>• <i>No need to publicly notify every resource consent application.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035	<i>Oppose submission 287</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessary delay and cost.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr BJ Graham	1036	ref. 104		<ul style="list-style-type: none"> <li>Removes Council discretion to decide when notification is appropriate and to whom.</li> </ul>
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
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Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Oppose submission 287 ref. 104		<ul style="list-style-type: none"> <li>Precluding notification appropriate for the activity status given short term nature of the activity and effect.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 287 ref. 104		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Clydevale Dairy Farms Ltd	297	Amend	Amend rule by deleting (b) and adding a wider range of factors that Council can consider when assessing an application, in particular social and economic factors.	<ul style="list-style-type: none"> <li>Schedule 16 limits assumed appropriate and can be met in all cases. Not necessarily the case.</li> <li>Other factors under RMA, such as social and economic wellbeing, efficient use of resources must be considered when non-compliance assessed.</li> </ul>
Greenfield Farming Ltd	298			
Big River Dairy Limited	299			
Federated Farmers of New Zealand	1057	Support submissions 297 - 299 ref. 104		<ul style="list-style-type: none"> <li>Consideration beyond environmental factors appropriate and consistent with RMA.</li> </ul>
The Director-General of Conservation	306	Amend	<p>That 12.C.2.1 be amended as follows, or to like effect: The discharge of the quantity of contaminants listed in Schedule 16 to land:</p> <p>(i) Where changes to land management or infrastructure have been unsuccessful in meeting the limits in Schedule 16, and the discharge first occurred prior to 31 March 2012; or</p> <p>(ii) Where the discharge results from a short-term activity with a short-term adverse effect, is a restricted discretionary activity.</p> <p>The matters to which the Council will restrict its discretion are:</p> <p>(a)- (j)</p> <p>(k) Any natural and human use value identified in Schedule 1 for any affected water body</p> <p>(il) The review of conditions of the resource consent.</p>	<ul style="list-style-type: none"> <li>No reference to the concentration of specified contaminants which are permitted.</li> <li>Contaminants can adversely affect scheduled natural and human use values, and regard should be given to avoiding, remedying or mitigating adverse effect on these.</li> </ul>
Craiglea Limited	1012	Oppose		<ul style="list-style-type: none"> <li>No evidence from environmental impacts from agricultural activities.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		submission 306 ref. 104		<ul style="list-style-type: none"> <li>• Changes are vague, unclear and open-ended.</li> <li>• No need for further restrictions on discharges.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 104		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Horticulture New Zealand	1032	Oppose submission 306 ref. 104		<ul style="list-style-type: none"> <li>• The rule is to provide for situations where Schedule 16 cannot be met so limiting the rule to the quantities in Schedule 16 is unworkable.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 104		<ul style="list-style-type: none"> <li>• Sought changes vague, unclear and open-ended.</li> <li>• Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> <li>• Nothing to be gained from introducing a high and costly level of consenting requirements if the Council cannot monitor and enforce provisions at issue.</li> <li>• Proposed changes would require an enormous number of staff to monitor.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
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Macraes Community Incorporated	1043			
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Mrs J Hodge	1046			
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Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050	Oppose submission 306 ref. 104		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 104		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 104		<ul style="list-style-type: none"> <li>• Sought changes vague, unclear and open-ended.</li> <li>• Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> <li>• Nothing to be gained from introducing a high and costly level of consenting requirements if the Council cannot monitor and enforce provisions at issue.</li> <li>• Proposed changes would require an enormous number of staff to monitor.</li> </ul>
Otago Water Resource Users Group	1056	Oppose in part submission 306 ref. 104		<ul style="list-style-type: none"> <li>• Should refer to the "contaminants exceeding the limits listed in Schedule 16".</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 306 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Must be appropriate balance of all values to be consistent with RMA.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i></li> </ul>
<i>Hawkdun Idaburn Irrigation Company Limited</i>	1066	<i>Oppose submission 306 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Oppose new clause (k), matters already covered by existing clauses.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</i></li> <li>• <i>Rules fail relevant tests under section 32 RMA.</i></li> <li>• <i>Additional controls not justified in terms of effects.</i></li> <li>• <i>Seek the submission be disallowed.</i></li> </ul>
Northburn Limited	307	Amend	<p>Wording should state that in the specific case of the 'Northburn terraces' the use of the current Borderdyke irrigation is appropriate given that the adverse effects are no more than minor when taken in context of the overall property and potential irrigatable areas.</p> <p>With regard to the timeframe until compliance with the proposed rule this should be at least 2021 (in line with the required change from deemed permits to Water rights).</p>	<ul style="list-style-type: none"> <li>• The effects are no more than minor, due to the small area of actual or potential runoff when taken in context of the large size of the total farm.</li> <li>• Timeframe for compliance is unreasonable due to the large cost for modification of irrigation practices.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 307 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Supports ensuring rule achievability and accounting for catchment variation.</i></li> </ul>
Clutha District Council	308	Amend	<p>Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.</p> <p>Or, (b) be deleted and new clauses added providing for discretion over social, economic, and practicality considerations.</p>	<ul style="list-style-type: none"> <li>• Consent and policy framework assume Schedule 16 limits can be met in all cases.</li> <li>• Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 308 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Agree rules should be clear and provide for circumstances where schedule 16 cannot be complied with.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 104</i>		<ul style="list-style-type: none"> <li>• <i>Ensures consideration of relevant factors and enables equitable approach.</i></li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308</i>		<ul style="list-style-type: none"> <li>• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 104</i>		
Glen Dene Limited	310	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> <li>• Consent and policy framework assume Schedule 16 limits can be met in all cases.</li> <li>• Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 – 326 ref. 104</i>		<ul style="list-style-type: none"> <li>• Ensures consideration of relevant factors.</li> <li>• Should be consenting option where rule can not be met.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 104</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 104</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

### 105 Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Oppose	Should all be permitted. Delete whole section.	<ul style="list-style-type: none"> <li>• Repair and maintenance of irrigation systems.</li> <li>• Serious adverse effect upon our irrigation scheme, hold rights to transfer such water.</li> <li>• Alarming that taking water from one watershed and discharging it into another watershed will become an activity requiring consent, when the water rights already include that consent.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	That Rule 12.C.2.2 be retained as currently drafted.  AND  The note to the rule to be amended as follows: The Consent Authority may preclude public notification...	<ul style="list-style-type: none"> <li>• Supports rule, but unclear how Council intends to satisfy itself concerns of Iwi are addressed.</li> <li>• Could be circumstances when notification appropriate due to scale and/or significance of activity.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 197</i>		<ul style="list-style-type: none"> <li>• Recognises potential public interest in the use of the regions public resources.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 105</i>		
<i>Otago Water Resource Users Group</i>	<i>1056</i>	<i>Oppose submission 197 ref. 105</i>		<i>• This rule will be most effective when exercised by the ORC at their sole discretion, without public participation after considering the specified matters.</i>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 197 ref. 105</i>		<i>Supports restricted discretionary status as set out in Trustpower's original submission.</i>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 197 ref. 105</i>		<i>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose in part submission 197 ref. 105</i>		<i>• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
<i>Trustpower Limited</i>	<i>206</i>	<i>Amend</i>	<i>Amend the proposed rule as follows: "Regardless of the permitted activity rules for other discharges in section 12.C.1, the discharge of water from one catchment to another is a restricted discretionary activity."</i>	<i>• Unclear how rules work together. • Rule should apply to catchment to catchment discharge regardless of permitted activity rules.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose in part submission 206 ref. 105</i>		<i>• Inconsistent with relief sought by further submitter.</i>
<i>Trustpower Limited</i>	<i>206</i>	<i>Support</i>	<i>Adopt the proposed rule.</i>	<i>• Restricted discretionary activity status for discharges between catchments is supported.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>263</i>	<i>Support</i>	<i>Supports the approach that applications for restricted discretionary and controlled activities would be dealt with on a non-notified basis.</i>	<i>• No reason given.</i>
<i>Environmental Defence Society</i>	<i>267</i>	<i>Amend</i>	<i>To amend the rules so that they are discretionary activities, and that the consent authority is not precluded from giving public notification of an application for resource consent for such activities.</i>	<i>• Matters of discretion fail to list important factors e.g. actual or potential effects on aquatic ecosystems, indigenous species and recreational activities. • Should not be a rule precluding public notification due to public interest in water quality.</i>
<i>Forest and Bird NZ</i>	<i>1007</i>	<i>Support submission 267 ref. 105</i>		<i>• Discretionary status is more appropriate. • Public notification should be the default position.</i>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose in part submission 267 ref. 105</i>		<i>• Oppose suggestion all applications for resource consent should be publicly notified.</i>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries</i>	<i>1049</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 267 ref. 105</i>		<i>• Restricted discretionary status more appropriate and public notification should be precluded.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 267 ref. 105</i>		<i>Supports restricted discretionary status as set out in Trustpower's original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 267 ref. 105</i>		<i>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 105</i>		<i>• Oppose submission in that it supports plan change and use of prohibited activity status.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 267 ref. 105</i>		<i>• Inconsistent with relief sought by further submitter.</i>
<i>Forest and Bird</i>	271	<i>Amend</i>	Add the following matters; "Any adverse effects on aquatic life, contact recreation, drinking and stock water."  Delete (h)  Delete: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."	<i>• Potential to have significant adverse effects on ecological, natural, human and stock use of waters and wetlands, including introduction of pests, weeds, fish and invertebrate species.</i> <i>• (h) suggests that it may be OK to adversely affect a RSW provided there is a financial contribution.</i> <i>• Must be an opportunity for public submissions where discharges can affect public interests and publicly owned resources.</i>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 271 ref. 105</i>		<i>• Current wording of the PP6A is appropriate and necessary.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 105</i>		<i>• Not all waterways need to be enhanced.</i> <i>• Notification is not always necessary or appropriate.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 105</i>		<i>• Notification of resource consent applications not always necessary or appropriate.</i> <i>• Adds unnecessary delay and cost.</i> <i>• Removes Council's discretion to determine when notification is appropriate, and to whom.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Appropriate to consider financial contribution and preclude notification given short term nature of the activity and effect.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Fish and Game (Central South Island)	273	Amend	Clarification on the notification level of restricted discretionary consents under these rule, in particular clarify that Fish and Game will be notified as an affected party.	<ul style="list-style-type: none"> <li>• Can only support rule if notification level is for limited notification.</li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 273 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Not necessary or appropriate to identify a particular party as being affected.</i></li> <li>• <i>Contrary to the notification of the RMA.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>No need to publicly notify each and every resource consent application.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>No need to publicly notify every resource consent application.</i></li> <li>• <i>Unnecessary delay and cost.</i></li> <li>• <i>Removes Council discretion to decide when notification is appropriate and to whom.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers</i>	1054			



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Association</i>				
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 273 ref. 105</i>		<i>This rule will be most effective when exercised by the ORC at their sole discretion, without public participation after considering the specified matters.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 273 ref. 105</i>		<i>• Precluding notification appropriate for the activity status given short term nature of the activity and effect.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 273 ref. 105</i>		<i>Supports restricted discretionary status as set out in Trustpower's original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 273 ref. 105</i>		<i>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</i>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 273 ref. 105</i>		<i>• There is no certainty F&amp;G will be an affected party.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 105</i>		<i>• Overly restrictive and disproportionate. • Does not take into account economic considerations.</i>
Annie Stuart	280	Oppose	Not sure that 'Section 12.C.2 Restricted discretionary activities: Resource consent required' provides adequate protection against practices that will have significant effects in regulating uptake of large quantities of water, discharge of chemically toxic wastewater, and potentially extensive damage to groundwater and underground water supplies.  Object to the rider that: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."	<i>• Plan change does not reflect pressure on Otago's water with currently proposed mining.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 280 ref. 105</i>		<i>• Proposed level of protection already higher than necessary. • Appropriate for no requirement to notify.</i>
Fish and Game (Otago)	287	Amend	Clarification on the notification level of restricted discretionary consents under this rule, in particular clarify that Fish and Game will be notified as an affected party.	<i>• Where public notification limited, presumably affected parties still notified. • Rule supported only if notification level is for limited notification.</i>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 287 ref. 105</i>		<i>• Not necessary or appropriate to identify a particular party as being affected. • Contrary to the notification of the RMA.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 105</i>		<i>• No need to publicly notify each and every resource consent application.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 105</i>		<i>• No need to publicly notify every resource consent application. • Unnecessary delay and cost. • Removes Council discretion to decide when notification is appropriate and to whom.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 287 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Precluding notification appropriate for the activity status given short term nature of the activity and effect.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 287 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Supports restricted discretionary status as set out in Trustpower's original submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
The Director-General of Conservation	306	Amend	That 12.C.2.2 be amended as follows, or to like effect: The matters to which the Council will restrict its discretion are: (a)-(k) (l) Any natural and human use value identified in Schedule 1 for any affected water body	<ul style="list-style-type: none"> <li>• Discharge of water from one catchment to another can adversely affect scheduled natural and human use values, and regard should be given to avoiding, remedying or mitigating adverse effect on these.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>No evidence from environmental impacts from agricultural activities.</i></li> <li>• <i>Changes are vague, unclear and open-ended.</i></li> <li>• <i>No need for further restrictions on discharges.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• <i>Sought changes vague, unclear and open-ended.</i></li> <li>• <i>Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</i></li> <li>• <i>Nothing to be gained from introducing a high and costly level of consenting requirements if the Council cannot monitor and enforce provisions at issue.</i></li> <li>• <i>Proposed changes would require an enormous number of staff to monitor.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
<i>Hawkdun Station</i>	1053			
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Sought changes vague, unclear and open-ended.</li> <li>• Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> <li>• Nothing to be gained from introducing a high and costly level of consenting requirements if the Council cannot monitor and enforce provisions at issue.</li> <li>• Proposed changes would require an enormous number of staff to monitor.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Concern with natural and human use values being placed above other values.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Alliance supports submissions seeking to amend the Section 12.C rules so that they are measurable and practical to assess and regulate, for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>Hawkdun Idaburn Irrigation Company Limited</i>	1066	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Oppose new clause (l), matters already covered by existing clauses.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 105</i>		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>

### 106 Rule 13.1.1.1 - Use of a structure permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
C P Mulholland	58	Support	Support 13.1.1.1	• No reasons given.
Glenayr Ltd (D & D Sangster)	59	Support	Support.	• Cost of consent used to spend on structure.
Hawkdun Idaburn Irrigation Company Ltd	70	Support	Should all be permitted. Approve.	• Repair and maintenance of irrigation systems.
Loganbrae Ltd	75	Support	Support.	• Cost of consent used to spend on structure.
Alastair Rutherford	105	Support	Keep rule as proposed.	• Keeps it simple.
Ernslaw One Ltd	149	Support	Retain current wording.	• Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	That Rule 12.3.1.1 be retained as currently drafted.	• Supports rule.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 106</i>		• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
M C Holland Farming Ltd	207	Amend	That Condition (ba) be amended to read: '(ba) Steps are taken to prevent, as far as possible, animal waste from entering the water body from the structure.'	• Requires any river crossing altered to ensure no animal waste reaches water from it. • Agree with intent. • Not practical to prevent all animal waste entering water.
Blakely Pacific Limited	209	Support	Retain current wording.	• Support permitted activity.
Rayonier New Zealand Ltd	256	Support	Retain current wording.	• Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
Forest and Bird	271	Amend	Add cross reference.  Amend 13.1.1.1 to read: "The use of any structure that is fixed in, on, under, or over the bed of any lake or river, or any Regionally Significant Wetland, or wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX is a ..."	• Rule deals with animal waste, not human. This should be cross-referenced as assists with understanding the plan. • Not all RSWs have been identified.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 106</i>		• <i>Not all waterways need to be enhanced.</i> • <i>Background data required before any agricultural activities are restricted.</i> • <i>Requiring resource consent for structures in Regionally Significant Wetland is inappropriate and unnecessary.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 106</i>		• <i>Not all waterways need to be enhanced.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 106</i>		<i>• Plan Change 2 determined regionally significant wetlands, no need to extend provision beyond those.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 106</i>		<i>• Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose in part submission 271 ref. 106</i>		<i>• Oppose inclusion of other areas not identified as RSM. Resource users need certainty as to which policies and rules apply which will not occur with this amendment.</i> <i>• Support requirement to prevent animal wastes entering water body.</i>
<i>Federated Farmers of New Zealand</i>	278	<i>Amend</i>	<i>Amend Rule 13.1.1.1(ba) to reflect below wording or similar: "(ba) All reasonable precautions are taken to ensure animal waste entering the water body is avoided."</i>	<i>• Support permitted approach.</i> <i>• Condition (ba) unachievable despite reasonable precautions being taken - impossible to prevent animal waste ever getting to water.</i> <i>• Use of a structure is preferable to nothing.</i> <i>• Rule should ensure appropriate steps and precautions are taken to minimise waste entering water.</i>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 106</i>		<i>• Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 106</i>		<i>• Operation relies on natural streams for continuing viability.</i> <i>• Plan change has huge impact on farming business.</i> <i>• Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 106</i>		<i>• No reason given.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 106</i>		<i>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i> <i>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i>
<i>Wenita Forest Products</i>	279	<i>Support</i>	<i>Retain current wording.</i>	<i>• Support providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.</i>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 279 ref. 106</i>		<i>• Rules relating to bed disturbance for crossing installation require amendment.</i>
<i>New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section</i>	282	<i>Support</i>	<i>We support the permitted activity status.</i>	<i>• Support providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.</i>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282</i>		<i>• Plan change should recognise the specific nature of plantation forestry.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 106</i>		
City Forests Limited	283	Support	Retain current wording.	<ul style="list-style-type: none"> <li>Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 106</i>		<ul style="list-style-type: none"> <li><i>Rules relating to bed disturbance for crossing installation require amendment.</i></li> </ul>
Southern Wood Council	289	Support	Retain current wording.	<ul style="list-style-type: none"> <li>Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.</li> </ul>
The Director-General of Conservation	306	Support	Retain as notified.	<ul style="list-style-type: none"> <li>Gives effect to the Council's statutory functions.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 106</i>		<ul style="list-style-type: none"> <li><i>No evidence from environmental impacts from agricultural activities.</i></li> <li><i>Changes are vague, unclear and open-ended.</i></li> <li><i>Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 106</i>		<ul style="list-style-type: none"> <li><i>Would impact on farming operation.</i></li> <li><i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li><i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 106</i>		<ul style="list-style-type: none"> <li><i>No reason given.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 106</i>		<ul style="list-style-type: none"> <li><i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 106</i>		<ul style="list-style-type: none"> <li><i>Very wide changes sought without evidence of environmental impact, including land management practice.</i></li> <li><i>Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</i></li> <li><i>Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<p>provisions as notified.</p> <ul style="list-style-type: none"> <li>Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>Shouldn't restrict necessary farming discharges.</li> <li>No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053	Oppose submission 306 ref. 106		<ul style="list-style-type: none"> <li>Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>Shouldn't restrict necessary farming discharges.</li> <li>No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 106		<ul style="list-style-type: none"> <li>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 106		<ul style="list-style-type: none"> <li>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 106		<ul style="list-style-type: none"> <li>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>Rules fail relevant tests under section 32 RMA.</li> <li>Additional controls not justified in terms of effects.</li> <li>Seek the submission be disallowed.</li> </ul>

### 107 Rule 13.2.1.7 - Single span bridge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Peter Deans & Graham Deans	63	Support	Agree with rule.	<ul style="list-style-type: none"> <li>Helps make bridges easier to put in.</li> <li>Keeps stock out of waterways.</li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Support	Should all be permitted. Approve.	<ul style="list-style-type: none"> <li>Repair and maintenance of irrigation systems.</li> </ul>
B R Philpott	71	Amend	Provide a more permissive approach to bridges including repair work.	<ul style="list-style-type: none"> <li>Flexibility needed to enable disturbance of banks and waterways during repair work e.g. repairing flood damage.</li> </ul>
Alastair Rutherford	105	Support	Keep rule as proposed.	<ul style="list-style-type: none"> <li>Keeps it simple.</li> </ul>
Jane Young	124	Support	Support this being a permitted activity.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Mt Aspiring Station	127	Support	Support the approach of allowing permitted activities such as erecting stock bridges etc.	<ul style="list-style-type: none"> <li>Makes it easier for land managers to contribute to improving water quality.</li> </ul>
Grant Bradfield	131	Support	Support.	<ul style="list-style-type: none"> <li>Important these structures encouraged to stop stock crossing through waterways.</li> </ul>
Andrew Jackson	132	Support	Support.	<ul style="list-style-type: none"> <li>Good.</li> </ul>
Ernslaw One Ltd	149	Amend	Align the proposed rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> <li>The bridge section of the manual gives specific guidance on bridge installation to allow both flood flows and floating logs without hitting the</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				structure.
Peter McNab	192	Support	Totally support.	<ul style="list-style-type: none"> <li>This is common sense.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	That Rule 13.2.1.7 be amended to require that there is no change to the water level or hydrological function, or no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland.  AND  The rules should specify a minimum distance between structures.	<ul style="list-style-type: none"> <li>Wetlands amendment will strengthen rule.</li> <li>Minimum distance will avoid incremental enclosure of rivers and tributaries.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 107</i>		<ul style="list-style-type: none"> <li>Minor changes to listed components would preclude permitted activity status.</li> <li>Unnecessary to specify a minimum distance between structures and one rule will not fit all.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 107</i>		<ul style="list-style-type: none"> <li>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
NZ Transport Agency	203	Support	Approve the rule as amended.	<ul style="list-style-type: none"> <li>Effects on water bodies will be avoided, remedied or mitigated.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 107</i>		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
Blakely Pacific Limited	209	Amend	Delete Rule 13.2.1.7(f) from the plan change, or align the proposed rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> <li>Manual gives specific guidance on bridge installation.</li> </ul>
Dunedin City Council	211	Support	That Rule 13.2.1.7 be approved as amended.	<ul style="list-style-type: none"> <li>Conditions ensure that adverse effects are avoided, remedied or mitigated.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 107</i>		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 107</i>		<ul style="list-style-type: none"> <li>Agree with submissions in relation to bed disturbance.</li> </ul>
<i>Central Otago District Council</i>	1051	<i>Support submission 211 ref. 107</i>		<ul style="list-style-type: none"> <li>Agree with submissions in relation to bed disturbance.</li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 107</i>		<ul style="list-style-type: none"> <li>Agree with submissions in relation to bed disturbance.</li> </ul>
Rod Philip	242	Support	Support this clause.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Rayonier New Zealand Ltd	256	Amend	Delete Rule 13.2.1.7 (f) from PC6A or, align with the bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> <li>The bridge section of the manual gives specific guidance on bridge installation to allow both flood flows and floating logs without hitting the structure.</li> </ul>
North Otago Irrigation Company	260	Support	Supports the changes to Rules 13.2.1.7.	<ul style="list-style-type: none"> <li>Streamlines the process of installing bridges and crossings.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 107</i>		<ul style="list-style-type: none"> <li>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 107</i>		<ul style="list-style-type: none"> <li>Support the NOIC submission in full.</li> </ul>
Colin Scurr	268	Amend	Amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> <li>Bridges are not always practical.</li> <li>No provision for culverts or pipe bridges.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 268</i>		<ul style="list-style-type: none"> <li>Submitter seeks amendment to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>ref. 107</i> <i>Support submission 268</i> <i>ref. 107</i>		• <i>Appropriate to provide for capacity otherwise rule too restrictive.</i>
Forest and Bird	271	Amend	Add the following matters: "[h] Animal waste is prevented from entering the water body and its margins. [i] The bridge, or its erection or placement, does not occur in a Regionally Significant Wetland or wetland that meets the criteria for Regionally Significant Wetland in Schedule XXXX."	• Discharge of animal waste should be prevented. • Erection of bridges can have adverse impacts on aquatic and wetland values and should be controlled by discretionary consent.
<i>Craiglea Limited</i>	1012	Oppose submission 271 ref. 107		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Limitations on animal waste discharges are unnecessary and inappropriate.</i></li> <li>• <i>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</i></li> <li>• <i>Requiring resource consent for structures in Regionally Significant Wetland is inappropriate and unnecessary.</i></li> </ul>
<i>Mr RJ Borst</i>	1034			
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	Oppose submission 271 ref. 107		• <i>Unachievable, high costs would outweigh minor effects.</i>
<i>Glenshee Station Limited</i>	1062	Oppose submission 271 ref. 107		• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i>
Federated Farmers of New Zealand	278	Support	Supports rule 13.2.1.[7].	• Supports extension of permitted rules. • Such structure will have no more than minor adverse effects.
<i>Albert McTainsh</i>	1004	Support submission 278 ref. 107		• <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	Support submission 278 ref. 107		<ul style="list-style-type: none"> <li>• <i>Operation relies on natural streams for continuing viability.</i></li> <li>• <i>Plan change has huge impact on farming business.</i></li> <li>• <i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	Support		<i>No reason given.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 278 ref. 107</i>		
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 107</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Oppose	Delete Rule 13.2.1.7(f) from PC6A.	<ul style="list-style-type: none"> <li>• Too stringent for plantation forestry operations in which it is often necessary to install crossing structures to access land. Such a limit on soffit placement is impractical and unnecessary.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282 ref. 107</i>		<ul style="list-style-type: none"> <li>• Plan change should recognise the specific nature of plantation forestry.</li> </ul>
City Forests Limited	283	Amend	Align rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> <li>• The Bridge section of the manual gives specific guidance on bridge installation.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 107</i>		<ul style="list-style-type: none"> <li>• Rules relating to bed disturbance for crossing installation require amendment.</li> </ul>
Fish and Game (Otago)	287	Support	Retain.	<ul style="list-style-type: none"> <li>• Rule is a good policy for public access into wetlands.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 107</i>		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> <li>• Affected by a variety of activities, not just agricultural uses.</li> <li>• Imposes unnecessary constraints on farming practices.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 107</i>		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Southern Wood Council	289	Amend	Align rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> <li>• The Bridge section of the manual gives specific guidance on bridge installation.</li> </ul>
William John Pile	301	Support	Strongly supports permitted installation of bridges.	<ul style="list-style-type: none"> <li>• Installing bridges improves and protects streams.</li> </ul>
Graylands Farms Ltd	302	Support	Support these changes.	<ul style="list-style-type: none"> <li>• Help keep vehicles and stock out of waterways.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Philip, Heather & Geoff Wilson	304	Amend	Broaden rule to encourage culverts or pipe bridges to be permitted.	<ul style="list-style-type: none"> <li>Bridges may be the ultimate but if farm needs 10 crossings improved the economics of bridges is impossible e.g. \$5,000 -10,000 for culvert/pipe bridge vs. \$40,000 - 50,000 for costly bridge.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 304 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Submitter seeks rule is broadened to encourage culverts or pipe bridges to be permitted.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 304 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Appropriate to provide for capacity otherwise rule too restrictive.</i></li> </ul>
The Director-General of Conservation	306	Amend	That 13.2.1.7 be amended as follows, or to like effect: The erection or placement of any single span bridge, over the bed of a lake or river, or any Regionally Significant Wetland, is a permitted activity, providing: (a)-(e) (g) Any animal waste will be prevented from entering the water body. (h) The bridge, or its erection or placement, does not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	<ul style="list-style-type: none"> <li>Prevention of discharge of animal waste should be part of criteria.</li> <li>Significant aquatic values can be adversely affected by the erection or placement of structures.</li> <li>The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</i></li> <li><i>Prevents normal and safe access to properties.</i></li> <li><i>Approach does not acknowledge local environmental conditions.</i></li> <li><i>Contrary to the purpose of the RMA.</i></li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</i></li> </ul>
<i>DJ &amp; KR Scott</i>	1008	<i>Oppose submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</i></li> <li><i>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>No evidence from environmental impacts from agricultural activities.</i></li> <li><i>Changes are vague, unclear and open-ended.</i></li> <li><i>Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</i></li> </ul>
<i>Auripo Enterprises Ltd</i>	1017	<i>Oppose submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Notified permitted activity rule and site standards are adequate.</i></li> <li><i>Changes restrict farming management and at odds with RPW restriction of stock crossing waterways.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Would impact on farming operation.</i></li> <li><i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li><i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>JH William &amp; KA McNally</i>	1020	<i>Oppose submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</i></li> <li><i>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</i></li> </ul>
<i>RJ McNally</i>	1021			
<i>Kim &amp; Mary Heany</i>	1024			
<i>Dunedin City Council</i>	1025	<i>Oppose submission 306 ref. 107</i>		<ul style="list-style-type: none"> <li><i>Many small structures can be erected with minimal adverse environmental effect.</i></li> </ul>
<i>TJ &amp; NM Arthur</i>	1026	<i>Oppose submission 306</i>		<ul style="list-style-type: none"> <li><i>Hindrance to farming practices and threat to viability of farm.</i></li> <li><i>Implications for maintenance of waterways and farm access, potential</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 107</i>		<i>damage to farmland and public roads.</i> <i>• Creeks are not in their original beds.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Oppose submission 306 ref. 107</i>		<i>• Too stringent.</i>
<i>Ida Valley Station / Ida Valley Irrigation Co</i>	<i>1033</i>	<i>Oppose submission 306 ref. 107</i>		<i>• The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</i> <i>• Would have a huge impact on farming operation.</i> <i>• Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</i> <i>• Costs of proposed changes outweigh any potential benefits.</i>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 107</i>		<i>• Proposed changes wide and not supported by evidence of environmental impacts.</i> <i>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</i> <i>• Sought changes vague, unclear and open-ended.</i>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>	<i>Oppose submission 306 ref. 107</i>		<i>• Proposed changes wide and not supported by evidence of environmental impacts.</i> <i>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</i> <i>• Sought changes vague, unclear and open-ended.</i>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Moutere Station Limited</i>	<i>1052</i>	<i>Oppose submission 306 ref. 107</i>		<i>• Very wide changes sought without evidence of environmental impact, including land management practice.</i> <i>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</i> <i>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</i> <i>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</i> <i>• Shouldn't restrict necessary farming discharges.</i> <i>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Hawkdun Station</i>	<i>1053</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Oppose submission 306</i>		<i>• Proposed changes wide and not supported by evidence of environmental impacts.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 107		<ul style="list-style-type: none"> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Preventing animal waste from entering water bodies is already addressed in rule 13.1.1.1.</li> <li>• Without identified areas, scope of changes relating to areas of significant aquatic values and their consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> <li>• Removal of flood debris must take place.</li> </ul>
Otago Water Resource Users Group	1056	Oppose in part submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Preventing animal waste from entering water bodies is already addressed in rule 13.1.1.1.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• High standard unachievable, high costs and complexity to avoid such activity would outweigh minor effects.</li> </ul>
TrustPower	1059	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>• Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>• Should be initiated by the Council.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Oppose new clause (g), impractical to implement 100% "any".</li> <li>• Oppose new clause (h). Oppose introduction of Schedule xx "Significant Aquatic Values" and its use in the rules that it is referred to. Zones 1 &amp; 2 cover significant area of Otago and would reduce the purpose of a permitted activity.</li> </ul>
Fonterra Co-operative Group Limited	1068	Support submission 306 ref. 107		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
The NZ Transport Agency	1073	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</li> <li>• Seeks that the submission be disallowed.</li> </ul>
Snowline Ltd	1076	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Seeks to prohibit what council deems to be a permitted activity on land DOC has not yet defined.</li> <li>• Need for clarification of the terms "bridge" and "culverts" in the glossary.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 107		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>
Central Otago District Council & Clutha District Council	309	Amend	Provision be included here, or in the definitions section, so that this rule also permits 'pipe bridges' where water pipes cross over rivers.	<ul style="list-style-type: none"> <li>• Would make it easier to use such structures and avoid disturbance involved in placing pipes under the bed.</li> </ul>
Strath Taieri Community Board	1029	Support		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 309 ref. 107</i>		
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Support submission 309 ref. 107</i>		<ul style="list-style-type: none"> <li>• Support that changes prevent effects of discharges being assessed on case by case basis.</li> <li>• Agree prohibited status should be removed.</li> <li>• Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable.</li> <li>• Support that reasonable mixing be provided for.</li> </ul>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 309 ref. 107</i>		<ul style="list-style-type: none"> <li>• Seek that the submission be allowed and the Plan Change amended as per the submission.</li> </ul>
Glen Dene Limited	310	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> <li>• Welcomes relaxed approach which will assist water quality.</li> <li>• Bias towards small bridges and no permitted provision for culverts or pipe bridges.</li> <li>• Bridges not always practical.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submissions 310 - 326 ref. 107</i>		<ul style="list-style-type: none"> <li>• Appropriate to provide for capacity as bridges not always practical.</li> </ul>
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submissions 310, 311 &amp; 312 ref. 107</i>		<ul style="list-style-type: none"> <li>• Submitter seeks amendment to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.</li> </ul>
<i>Meridian Energy Limited</i>	<i>1014</i>	<i>Support submission 312 ref. 107</i>		<ul style="list-style-type: none"> <li>• The installation of a culvert should be included in the permitted activity status of Rule 13.2.1.7.</li> </ul>
<i>The Director-General of Conservation</i>	<i>1011</i>	<i>Oppose submission 323 ref. 107</i>		<ul style="list-style-type: none"> <li>• Incorrectly installed culverts etc. can adversely affect fish passage, spawning sites and habitat, etc.</li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 326 ref. 107</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

### 108 Rule 13.2.1.7A - Boardwalk permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Support	Should all be permitted.	<ul style="list-style-type: none"> <li>• Repair and maintenance of irrigation systems.</li> </ul>
Alastair Rutherford	105	Support	Keep rule as proposed.	<ul style="list-style-type: none"> <li>• Keeps it simple.</li> </ul>
Grant Bradfield	131	Support	Support.	<ul style="list-style-type: none"> <li>• Important these structures encouraged to stop stock crossing through waterways.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	<p>That Rule 13.2.1.7A be amended to require that there is no change to the water level or hydrological function, or no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland.</p> <p>AND</p> <p>The rules should specify a minimum distance between structures.</p>	<ul style="list-style-type: none"> <li>• Wetlands amendment will strengthen rule.</li> <li>• Minimum distance will avoid incremental enclosure of rivers and tributaries.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 197 ref. 108		<ul style="list-style-type: none"> <li>• Minor changes to listed components would preclude permitted activity status.</li> <li>• Unnecessary to specify a minimum distance between structures and one rule will not fit all.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 197 ref. 108		<ul style="list-style-type: none"> <li>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
Rod Philip	242	Support	Support this clause.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Forest and Bird	271	Amend	<p>Add the following words:</p> <p>"The erection or placement of any board walk for recreational purposes in, ...</p> <p>(b) Animal waste is prevented from entering the water body and its margins.</p> <p>(c) The structure is maintained in good repair."</p>	<ul style="list-style-type: none"> <li>• Boardwalks can be permitted provided they are for recreational purposes and do not result in discharge of animal waste.</li> </ul>
Craiglea Limited	1012	Oppose submission 271 ref. 108		<ul style="list-style-type: none"> <li>• Not all waterways need to be enhanced.</li> <li>• Limitations on animal waste discharges are unnecessary and inappropriate.</li> <li>• Not practical to minimise the use of all beds and rivers and lakes and wetlands.</li> </ul>
Mr RJ Borst	1034	Oppose submission 271 ref. 108		<ul style="list-style-type: none"> <li>• Limitations on animal waste discharges are unnecessary and inappropriate.</li> <li>• Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</li> <li>• Background data required before any steps are taken to restrict agricultural activities.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 108</i>		<i>• Unachievable, high costs would outweigh minor effects.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 108</i>		<i>• Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i>
Federated Farmers of New Zealand	278	Support	Supports rule 13.2.1.[7A].	<i>• Supports extension of permitted rules. • Such structure will have no more than minor adverse effects.</i>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 108</i>		<i>• Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 108</i>		<i>• Operation relies on natural streams for continuing viability. • Plan change has huge impact on farming business. • Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 108</i>		<i>No reason given.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 108</i>		<i>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits. • Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i>
Graylands Farms Ltd	302	Support	Support.	<i>• Help keep vehicles and stock out of waterways.</i>
The Director-General of Conservation	306	Support	Retain as notified.	<i>• Gives effect to Council's statutory functions.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 108</i>		<i>• No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 108</i>		<i>• Would impact on farming operation. • Further submitter is currently undertaking significant measures to address any potential effects on water quality. • Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 108</i>		<i>• No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 108</i>		<i>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052			
<i>Hawkdun Station</i>	1053	Oppose submission 306 ref. 108		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	Oppose submission 306 ref. 108		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
<i>Glenshee Station Limited</i>	1062	Oppose submission 306 ref. 108		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	Oppose submission 306 ref. 108		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>

### 109 Rule 13.2.1.7B - Crossing permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Luxmore Dairies	7	Amend	Amend by saying no limit on height or diameter of culverts. Amend crossing length to say 20 m.	<ul style="list-style-type: none"> <li>• Maximise flood carrying capacity.</li> <li>• Battering reduces usable crossing.</li> </ul>
Peter Deans & Graham Deans	63	Amend	13.2.1.7B (b) Amend rule so the top height of crossings to be lifted to 3 to 5 meters above creek base.	<ul style="list-style-type: none"> <li>• Agree with rule.</li> <li>• Some need to be built up to create safe crossing.</li> <li>• More crossings keep stock out of waterways.</li> </ul>
Greg Ramsay & Gae Stott	68	Amend	The top height of crossing is far too low for deep gullies, 3-5 metres.	<ul style="list-style-type: none"> <li>• Needs to be case-based (5 metres +).</li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Support	Should all be permitted. Approve.	<ul style="list-style-type: none"> <li>• Repair and maintenance of irrigation systems.</li> </ul>
B R Philpott	71	Amend	Provide a more permissive approach to crossings including repair	<ul style="list-style-type: none"> <li>• Flexibility needed to enable disturbance of banks and waterways during repair</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			work.	work e.g. repairing flood damage.
Ross A & Alexa Wallace	101	Amend	13.2.1.7B (b) unnecessary - remove. 13.2.1.7B (c) change 10 m to 12 m in length.	<ul style="list-style-type: none"> <li>• (b) unnecessary, other clauses cover this.</li> <li>• (c) a lot of culvert pipes are 6 m long.</li> </ul>
Alan McMillan	104	Amend	Agree with exemption for occasional crossing.	<ul style="list-style-type: none"> <li>• Raises questions about interpretation of 'crossing'.</li> <li>• Will prevent sedimentation and pugging but not prevent faecal contamination, e.g. underwater structures such as fords.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 104 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
Alastair Rutherford	105	Support	Keep rule as proposed.	<ul style="list-style-type: none"> <li>• Keeps it simple.</li> </ul>
Jane Young	124	Support	Support this being a permitted activity.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Grant Bradfield	131	Support	Support.	<ul style="list-style-type: none"> <li>• Important these structures encouraged to stop stock crossing through waterways.</li> </ul>
Andrew Jackson	132	Amend	Good, but increase height to 2.5 m above creek bed.	<ul style="list-style-type: none"> <li>• 1.5 m not enough in a small deep gully.</li> </ul>
Waitaki District Council	138	Amend	Clarity needed otherwise culverts may require resource consent.	<ul style="list-style-type: none"> <li>• Rule 13.2.1.7 removes 'culvert' from being permitted, and it is not clear if 'crossing' in 13.2.1.7B allows for culverts.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with DCC position.</i></li> <li>• <i>Concern about economic and social impact.</i></li> <li>• <i>Control measures of PC6A go far beyond those required to achieve the stated environmental results.</i></li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 138 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Placement of a culvert and the discharge to the stream that results from it can have detrimental effect on spawning values.</i></li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Areas of concern or support are consistent with those expressed by the NZTA.</i></li> <li>• <i>Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</i></li> <li>• <i>Seek the submission is allowed.</i></li> </ul>
Ernslaw One Ltd	149	Amend	Amend the proposed rule to be a permitted activity to be informed by Appendix E: Priority Decisions For Installation of a New In-Stream Structure from Boubee, J. et al 1999. Fish Passage At Culverts - A review, with possible solutions for New Zealand indigenous species 62p.	<ul style="list-style-type: none"> <li>• Proposed rule not consistent with good forest engineering practice.</li> <li>• Sometimes need to impede upstream passage of predatory fish to protect upstream endangered indigenous fish habitat.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 149 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Incorrectly installed culverts etc. can adversely affect fish passage, spawning sites and habitat, etc.</i></li> </ul>
John Latta	162	Amend	(b) Should be deleted.	<ul style="list-style-type: none"> <li>• Steep sided gullies or creeks often have a stream bed much deeper than 1.5m below the top of its banks.</li> <li>• Height of crossing should have no impact on water quality.</li> </ul>
James Watt	167	Amend	Remove clause (b).  Definition of "river" needed.	<ul style="list-style-type: none"> <li>• Unnecessary restriction.</li> </ul>
Gilbert Black	179	Amend	(b) The top of the crossing is no higher than 1.5 metres above the normal water surface level where it is located.	<ul style="list-style-type: none"> <li>• Best place to locate bridge is where water deepest. Water runs slowest at this point, allows more capacity under bridge during floods and reduces likelihood of erosion.</li> </ul>
Peter McNab	192	Support	Totally support.	<ul style="list-style-type: none"> <li>• This is common sense.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	That Rule 13.2.1.7B be amended to require that there is no change to the water level or hydrological function, or no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland.	<ul style="list-style-type: none"> <li>• Wetlands amendment will strengthen rule.</li> <li>• Minimum distance will avoid incremental enclosure of rivers and tributaries.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			AND	
			The rules should specify a minimum distance between structures.	
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Minor changes to listed components would preclude permitted activity status.</i></li> <li>• <i>Unnecessary to specify a minimum distance between structures and one rule will not fit all.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i></li> </ul>
NZ Transport Agency	203	Amend	Add the words ", including culverts, fords and pipe crossings," after the first incidence of the word "crossing" in Rule 13.2.1.7B. Delete (c).	<ul style="list-style-type: none"> <li>• "Crossing" needs to be defined. It should include culverts and other piped crossings.</li> <li>• Restricting length to 10 m is not justifiable in terms of effects.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
Trustpower Limited	206	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> <li>• Support ensuring bed disturbance by stock has no significant adverse effect.</li> <li>• Support making bed crossings more permissive.</li> </ul>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Supports retention of Rule 13.2.1.7B to make bed crossings more permissive.</i></li> </ul>
Blakely Pacific Limited	209	Amend	Amend rule to address the concern expressed in Reasons, reword the rule to say: the erection or placement of any crossing in or on the bed of a lake or river, is a permitted activity, provided that the maximum fill height is no greater than 1.5 m above the lowest part of the bed where it is located.	<ul style="list-style-type: none"> <li>• Rule too stringent for plantation forestry operations.</li> <li>• Culverts require a minimum overburden depth, e.g. 1 m diameter culvert requires minimum of 500 mm overburden.</li> </ul>
Lakes Landcare	210	Support	Leave.	<ul style="list-style-type: none"> <li>• <u>Sensible permitted activity allowing culverts and bridges.</u></li> </ul>
Dunedin City Council	211	Amend	Add the words ", including culverts, fords and pipe crossings," after the first incidence of the word "crossing". Delete (c).	<ul style="list-style-type: none"> <li>• Useful to clarify meaning of "crossing".</li> <li>• Restricting crossing to 10 m along length of water body is not justifiable.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 211 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Submitter seeks clarification on the word "crossing".</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Central Otago District Council</i>	1051	<i>Support submission 211 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
Rod Philip	242	Support	Support this clause.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Rod Philip	242	Support	Support this clause.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Rayonier New Zealand Ltd	256	Amend	Amend rule to address the concern [given in the reasons].	<ul style="list-style-type: none"> <li>• Overly stringent for forestry operations.</li> <li>• Rule does not allow for culverts.</li> <li>• If rule enacted could curtail half of future culvert installations.</li> <li>• In certain catchments it is desirable to impede fish passage (protection of native fish).</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Waitaki District Council	1003	Support in part submission 256 ref. 109		<ul style="list-style-type: none"> <li>• Submitter seeks rule allows for culverts.</li> </ul>
North Otago Irrigation Company	260	Support	Supports the changes to Rules 13.2.1.7B.	<ul style="list-style-type: none"> <li>• Streamlines the process of installing bridges and crossings.</li> </ul>
John Webster	1063	Support submission 260 ref. 109		<ul style="list-style-type: none"> <li>• Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
Peter Mitchell	1064	Support submission 260 ref. 109		<ul style="list-style-type: none"> <li>• Support the NOIC submission in full.</li> </ul>
Colin Scurr	268	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> <li>• Not clear what a 'crossing' is.</li> <li>• Rule too restrictive and unable to facilitate desired outcome.</li> </ul>
Waitaki District Council	1003	Support submission 268 ref. 109		<ul style="list-style-type: none"> <li>• Submitter seeks rule be amended to have a broader application and provide explicitly for installation of culverts.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 268 ref. 109		<ul style="list-style-type: none"> <li>• Appropriate to provide for capacity otherwise rule too restrictive.</li> </ul>
Forest and Bird	271	Amend	Add: "(j) Its erection or placement, does not occur in a Regionally Significant Wetland or wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX."	<ul style="list-style-type: none"> <li>• Erection of structures including crossings can have significant adverse effects on water quality.</li> </ul>
Craiglea Limited	1012	Oppose submission 271 ref. 109		<ul style="list-style-type: none"> <li>• Not all waterways need to be enhanced.</li> <li>• Requiring resource consent for structures in Regionally Significant Wetland is inappropriate and unnecessary.</li> <li>• Not practical to minimise the use of all beds and rivers and lakes and wetlands.</li> </ul>
Mr RJ Borst	1034	Oppose submission 271 ref. 109		<ul style="list-style-type: none"> <li>• Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</li> <li>• Background data required before any steps are taken to restrict agricultural activities.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change 2 process determined regionally significant wetlands.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
Federated Farmers of New Zealand	278	Support	Supports rule 13.2.1.[7B].	<ul style="list-style-type: none"> <li>• Supports extension of permitted rules.</li> <li>• Such structure will have no more than minor adverse effects.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Practical and workable alternatives, solutions and suggestions.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i></li> <li>• <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i></li> </ul>
Wenita Forest Products	279	Amend	Amend rule 13.2.1.7B (b, c, f)] to address the concerns expressed [in Reasons].	<ul style="list-style-type: none"> <li>• Rule overly stringent for plantation forestry.</li> <li>• Need to allow installation of culverts, which require a minimum of over burden depth, usually 1-1.5 times the culvert diameter. It may also need to be 2 or even 3 standard 6 metre long culverts, in deeply incised country.</li> <li>• Rule will increase costs and risks for construction of relatively minor crossings.</li> <li>• Sometimes need to impede the upstream passage of predatory fish in order to protect upstream endangered indigenous fish habitat.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 279 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Submitter seeks rule allows for culverts.</i></li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 279 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Rules relating to bed disturbance for crossing installation require amendment.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 279 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Appropriate to provide for capacity otherwise rule too restrictive.</i></li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Amend	Amend rule to address the concerns [given in the reasons].	<ul style="list-style-type: none"> <li>• Rule is overly stringent for plantation forestry operations which often need crossing structures.</li> <li>• Need to allow the installation of culverts, which require a minimum of over burden depth. For example, a one meter diameter culvert requires a minimum of 500 mm over burden.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 282 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Submitter seeks rule allows for culverts.</i></li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Plan change should recognise the specific nature of plantation forestry.</i></li> <li>• <i>Rules relating to bed disturbance for crossing installation require amendment.</i></li> </ul>
City Forests Limited	283	Amend	Amend rule to address the concerns [given in the reasons] and to be informed by Appendix E: Priority Decisions For Installation of a New In-Stream Structure from Boubee, J. et al 1999. Fish Passage At Culverts - A review, with possible solutions for New Zealand	<ul style="list-style-type: none"> <li>• Rule too stringent for plantation forestry operations. Culvert installation requires minimum overburden depth, usually 1-1.5 times the culvert diameter. It may also need to be 2 or even 3 standard 6 metre long culverts, in deeply incised country.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			indigenous species 62p.	<ul style="list-style-type: none"> <li>• Rule will increase costs and risks of construction of relatively minor crossings.</li> <li>• Sometimes need to impede the upstream passage of predatory fish in order to protect upstream endangered indigenous fish habitat.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 283 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Submitter seeks rule allows for culverts.</i></li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Rules relating to bed disturbance for crossing installation require amendment.</i></li> </ul>
Paterson Pitts Partners Ltd	288	Amend	Amend 13.2.1.7B (d) to provide that the crossing is capable of passing a 1 in 10 year or 10% AEP (annual exceedence probability) flood event.	<ul style="list-style-type: none"> <li>• Makes a crossing easier as a permitted activity.</li> <li>• "Flood conveyance of the lake or river" vague and unenforceable.</li> <li>• Farmers and contractors often underestimate culvert size for a reasonable flood event</li> <li>• Certainty required for efficiency and effectiveness.</li> <li>• <b>Not economically practical to provide for a flood event greater than 10% AEP.</b></li> </ul>
Southern Wood Council	289	Amend	Amend rule to address the concerns [given in the reasons] and to be informed by Appendix E: Priority Decisions For Installation of a New In-Stream Structure from Boubee, J. et al 1999. Fish Passage At Culverts - A review, with possible solutions for New Zealand indigenous species 62p.	<ul style="list-style-type: none"> <li>• Rule too stringent for plantation forestry operations. Culvert installation requires minimum overburden depth, e.g.1 m diameter culvert requires a minimum of 500 mm overburden. It may also need to be 2 or even 3 standard 6 metre long culverts, in deeply incised country. Rule will increase costs and risks of construction of relatively minor crossings.</li> <li>• Sometimes need to impede the upstream passage of predatory fish in order to protect upstream endangered indigenous fish habitat.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 289 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Submitter seeks rule allows for culverts.</i></li> </ul>
William John Pile	301	Support	Strongly supports permitted installation of culverts.	<ul style="list-style-type: none"> <li>• Installing culverts improves and protects streams.</li> <li>• Was going to have to pay \$3500+ to put in a culvert.</li> </ul>
Graylands Farms Ltd	302	Amend	13.2.1.7B (b): want amended to; no higher than 3m above the lowest parts.  13.2.1.7B (c): want amended to; does not exceed 15m along the length...	<ul style="list-style-type: none"> <li>• Support rule as helps keep vehicles and stock out of waterways.</li> <li>• Crossings of redundant railway formation over streams can be 3 m high, which by being level avoids low points for runoff to occur.</li> <li>• 15 m width allows room for vehicles and stock to cross with less baring of gravel or soil which can occur on narrow crossings. Extra width allows grass buffer to reduce run off for those willing to incur the cost of an extra pipe.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 302 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>More appropriate measures where needed.</i></li> </ul>
The Director-General of Conservation	306	Amend	That 13.2.1.7B be amended as follows, or to like effect: Unless covered by Rule 13.2.1.7 the erection or placement of any crossing in or on the bed of a lake or river, or any Regionally Significant Wetland, is a permitted activity, providing: (a)-(h) (i) Any animal waste will be prevented from entering the water body. (i) Its erection or placement, does not occur in an area identified in Schedule xx - Areas of Significant Aquatic Values as being in Zone 1 or 2 [see submission point 228].	<ul style="list-style-type: none"> <li>• Prevention of discharge of animal waste should be part of criteria.</li> <li>• Significant aquatic values can be adversely affected by the erection or placement of structures.</li> <li>• The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>• Including new Schedule of areas provides greater clarity.</li> <li>• Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</i></li> <li>• <i>Prevents normal and safe access to properties.</i></li> <li>• <i>Approach does not acknowledge local environmental conditions.</i></li> <li>• <i>Contrary to the purpose of the RMA.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Forest and Bird NZ	1007	Support submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>
DJ & KR Scott	1008	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>• Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
Craiglea Limited	1012	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• No evidence from environmental impacts from agricultural activities.</li> <li>• Changes are vague, unclear and open-ended.</li> <li>• Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</li> </ul>
Auripo Enterprises Ltd	1017	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Minimal waste will enter waterway. Not practical to prevent.</li> <li>• Notified permitted activity rule and site standards are adequate.</li> <li>• Changes restrict farming management and at odds with RPW restriction of stock crossing waterways.</li> </ul>
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Would impact on farming operation.</li> <li>• Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>• Costs of the proposed changes outweigh the benefits.</li> </ul>
JH William & KA McNally	1020	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>• Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
RJ McNally	1021			
Kim & Mary Heany	1024			
Dunedin City Council	1025	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Many small structures can be erected with minimal adverse environmental effect.</li> </ul>
TJ & NM Arthur	1026	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Hindrance to farming practices and threat to viability of farm.</li> <li>• Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>• Creeks are not in their original beds.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Too stringent.</li> </ul>
Ida Valley Station / Ida Valley Irrigation Co	1033	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</li> <li>• Would have a huge impact on farming operation.</li> <li>• Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</li> <li>• Costs of proposed changes outweigh any potential benefits.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community	1043			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Incorporated</i>				
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Preventing animal waste from entering water bodies is already addressed in rule 13.1.1.1.</li> <li>• Without identified areas, scope of changes relating to areas of significant aquatic values and their consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> <li>• Removal of flood debris must take place.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• High standard unachievable, high costs and complexity to avoid such activity would outweigh minor effects.</li> </ul>
TrustPower	1059	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>• Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>• Should be initiated by the Council.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 109		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306		<ul style="list-style-type: none"> <li>• Oppose new clauses (i) and (j).</li> <li>• Impractical to implement 100% "any".</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Oppose introduction of Schedule xx "Significant Aquatic Values" and its use in the rules that it is referred to. Zones 1 &amp; 2 cover significant area of Otago and would reduce the purpose of a permitted activity.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	<i>1068</i>	<i>Support submission 306 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Oppose submission 306 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</i></li> <li>• <i>Seeks that the submission be disallowed.</i></li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	<i>1077</i>	<i>Oppose submission 306 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</i></li> <li>• <i>Rules fail relevant tests under section 32 RMA.</i></li> <li>• <i>Additional controls not justified in terms of effects.</i></li> <li>• <i>Seek the submission be disallowed.</i></li> </ul>
Glen Dene Limited	310	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts where appropriate.	<ul style="list-style-type: none"> <li>• Provision needs to be made for crossings. However it is not clear what a 'crossing' is.</li> <li>• Rule is too restrictive, few crossings would comply making rule impractical.</li> <li>• Rule should provide for culverts and pipe bridges.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			<ul style="list-style-type: none"> <li>• <i>Submitters seeks clarification on what a "crossing" is</i></li> <li>• <i>Submitter seeks culverts be a permitted activity</i></li> </ul>
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support in part submissions 310 – 326 ref. 109</i>		
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submissions 310 - 326 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Appropriate to provide for capacity otherwise rule too restrictive.</i></li> </ul>
<i>The Director-General of Conservation</i>	<i>1011</i>	<i>Oppose submission 323 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Incorrectly installed culverts etc. can adversely affect fish passage, spawning sites and habitat, etc.</i></li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 326 ref. 109</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</i></li> </ul>

### 110 Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alastair Rutherford	105	Support	Keep rule as proposed.	<ul style="list-style-type: none"> <li>Keeps it simple.</li> </ul>
Waitaki District Council	138	Amend	No decision requested.	<ul style="list-style-type: none"> <li>Rule title has "repair, maintenance" but none of the subsequent rules include these as permitted activities.</li> <li>Rule 13.1.1.1 (c) provides for a structure to be in good repair", therefore is contradictory if repair works are not permitted.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 110</i>		<ul style="list-style-type: none"> <li>Consistent with DCC position.</li> <li>Concern about economic and social impact.</li> <li>Control measures of PC6A go far beyond those required to achieve the stated environmental results.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 138 ref. 110</i>		<ul style="list-style-type: none"> <li>Maintenance and repair of existing structures needs to be clarified.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 110</i>		<ul style="list-style-type: none"> <li>Areas of concern or support are consistent with those expressed by the NZTA.</li> <li>Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</li> <li>Seek the submission is allowed.</li> </ul>
Ernslaw One Ltd	149	Amend	Delete the word 'maintenance' from Rule 13.3.	<ul style="list-style-type: none"> <li>Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'.</li> <li>Maintenance should be permitted activity.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 149 ref. 110</i>		<ul style="list-style-type: none"> <li>Submitter seeks deletion of the word "maintenance" from Rule.</li> </ul>
Blakely Pacific Limited	209	Amend	Delete the word 'maintenance' from Rule 13.3.	<ul style="list-style-type: none"> <li>Reference to 'maintenance' inconsistent with Rule 13.1.1.1(c).</li> <li>Maintenance should be permitted.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 209 ref. 110</i>		<ul style="list-style-type: none"> <li>Submitter seeks deletion of the word "maintenance" from Rule.</li> </ul>
Rod Philip	242	Support	Support these clauses.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Rayonier New Zealand Ltd	256	Oppose	Delete the word "maintenance" from Rule 13.3.	<ul style="list-style-type: none"> <li>Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'.</li> <li>Maintenance should be permitted activity.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 256 ref. 110</i>		<ul style="list-style-type: none"> <li>Submitter seeks deletion of the word "maintenance" from Rule.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 256 ref. 110</i>		<ul style="list-style-type: none"> <li>Maintenance of existing structure is provided for as a permitted activity in Rule 13.3.1.1 which is not subject of change in PC6A.</li> <li>Removing reference to maintenance in the heading to section 13.3 would then achieve nothing.</li> <li>Removing that reference is beyond the scope of the plan change.</li> <li>It would achieve the opposite result to that which the submitter seeks.</li> </ul>
Federated Farmers of New Zealand	278	Amend	Adopt Rule 13.3.1 as proposed alongside inclusion of reference to Regionally Significant Wetlands.	<ul style="list-style-type: none"> <li>Activities now appropriately included.</li> <li>Given that RSW specifically referred to in 13.2, it is appropriate to expressly include them in the 13.3 rules (not otherwise amended in this plan change).</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 110</i>		<ul style="list-style-type: none"> <li>Practical and workable alternatives, solutions and suggestions.</li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278</i>		<ul style="list-style-type: none"> <li>Operation relies on natural streams for continuing viability.</li> <li>Plan change has huge impact on farming business.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 110</i>		<ul style="list-style-type: none"> <li>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 110</i>		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 110</i>		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Amend	Delete the word 'maintenance' from Rule 13.3.	<ul style="list-style-type: none"> <li>Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'.</li> </ul>
City Forests Limited	283			
Southern Wood Council	289			
<i>Waitaki District Council</i>	1003	<i>Support submissions 282, 283 &amp; 289 ref. 110</i>		<ul style="list-style-type: none"> <li>Submitter seeks deletion of the word "maintenance" from Rule.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submissions 282 and 283 ref. 110</i>		<ul style="list-style-type: none"> <li>Rules relating to bed disturbance for crossing installation require amendment.</li> </ul>

#### 111 Rule 13.3.2.1 - Alteration of a structure restricted discretionary

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Support	Should all be permitted. Approve.	<ul style="list-style-type: none"> <li>Repair and maintenance of irrigation systems.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	That Rule 13.3.2 be retained as currently drafted.	<ul style="list-style-type: none"> <li>Supports rule.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 111</i>		<ul style="list-style-type: none"> <li>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Support	Supports the approach that applications for restricted discretionary and controlled activities would be dealt with on a non-notified basis.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Forest and Bird	271	Amend	<p>Amend 13.3.2.1 as follows:  "Except as provided for by Rules 13.3.1.1 and 13.3.1.2, the extension, alteration, replacement or reconstruction of any structure, fixed in, on, under or over the bed of any lake or river, or any Regionally Significant Wetland, or wetland that meets the criteria for Regionally Significant Wetland in Schedule XXXX...</p> <p>Add the following matters:  (a) ...  (v) Indigenous flora and fauna  (vii) Any adverse effect on, water levels, and/or hydrological functioning.</p>	<ul style="list-style-type: none"> <li>Rule as proposed has potential to adversely affect ecological functioning and values of water bodies.</li> <li>Consent authority should not be precluded from publicly notifying consents that are likely to result in adverse effects.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			(aa) Any effect on any Regionally Significant Wetland or wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX, or on any regionally significant wetland value."  Delete: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 111</i>		<ul style="list-style-type: none"> <li>• Not all waterways need to be enhanced.</li> <li>• Requiring resource consent for structures in Regionally Significant Wetland is inappropriate and unnecessary.</li> <li>• Not practical to minimise the use of all beds and rivers and lakes and wetlands.</li> <li>• Notification is not always necessary and appropriate.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 111</i>		<ul style="list-style-type: none"> <li>• Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</li> <li>• Background data required before any steps are taken to restrict agricultural activities.</li> <li>• Requiring consents for bridges and other structures in Regionally Significant Wetlands inappropriate and unnecessary. It adds significant cost to farming operations.</li> <li>• Notification of resource consent applications not always necessary or appropriate.</li> <li>• Adds unnecessary delay and cost to the process.</li> <li>• Removes Council's discretion to determine when notification is appropriate, and to whom.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 111</i>		<ul style="list-style-type: none"> <li>• Plan Change 2 process determined regionally significant wetlands.</li> <li>• Appropriate to preclude public notification of applications.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 111</i>		<ul style="list-style-type: none"> <li>• Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
Federated Farmers of New Zealand	278	Amend	Amend the wording of Rule 13.3.2.1(m) to the following wording or similar: "13.3.2.1(m) Precautions taken to ensure animal waste entering water is minimised or prevented."	<ul style="list-style-type: none"> <li>• More appropriate to consider what reasonable precautions farmers will take to ensure discharge of waste is minimised or prevented.</li> <li>• More realistic and achievable.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 111</i>		<ul style="list-style-type: none"> <li>• Practical and workable alternatives, solutions and suggestions.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 278</i>		<ul style="list-style-type: none"> <li>• Recognises need to control waste entering below such structures.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Hopefield Investments Ltd</i>	1019	<i>ref. 111</i> <i>Support submission 278</i> <i>ref. 111</i>		<ul style="list-style-type: none"> <li>• Operation relies on natural streams for continuing viability.</li> <li>• Plan change has huge impact on farming business.</li> <li>• Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278</i> <i>ref. 111</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278</i> <i>ref. 111</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
The Director-General of Conservation	306	Amend	<p>That 13.3.2.1 be amended as follows, or to like effect: Except as provided for by Rules 13.3.1.1 and 13.3.1.2, the extension, alteration, replacement or reconstruction of any structure, fixed in, on, under or over the bed of any lake or river, or any Regionally Significant Wetland, is a restricted discretionary activity.</p> <p>In considering any resource consent for the extension, alteration, replacement or reconstruction of any structure in terms of this rule, the Otago Regional Council will restrict the exercise of its discretion to the following:</p> <p>(a) Any adverse effects of the activity on:</p> <p>(i)-(iv)</p> <p>(v) The areas defined in Schedule xx - Areas of Significant Aquatic Values, being in Zone 1 or 2 [see submission point 228]</p> <p>(aa) Any effect on any Regionally Significant Wetland or on any regionally significant wetland value; and</p> <p>(b)-(j); and</p> <p>(k) A financial contribution if the structure is a dam, or for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected; and</p> <p>(l) The review of conditions of the resource consent.; and</p> <p>(m) How any animal waste will be prevented from entering the water body; and</p>	<ul style="list-style-type: none"> <li>• Inadequately considered and constructed structures have the potential to adversely affect the subject water body and values within it.</li> <li>• Matters the Council would restrict their discretion to are not comprehensive enough.</li> <li>• The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>• Including new Schedule of areas provides greater clarity.</li> <li>• Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
<i>ME Elston</i>	1002	<i>Oppose submission 306</i> <i>ref. 111</i>		<ul style="list-style-type: none"> <li>• Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</li> <li>• Prevents normal and safe access to properties.</li> <li>• Negative implications for stormwater control and maintenance works.</li> <li>• Approach does not acknowledge local environmental conditions.</li> <li>• Contrary to the purpose of the RMA.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 306</i> <i>ref. 111</i>		<ul style="list-style-type: none"> <li>• Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>
<i>DJ &amp; KR Scott</i>	1008	<i>Oppose submission 306</i> <i>ref. 111</i>		<ul style="list-style-type: none"> <li>• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>• Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306</i>		<ul style="list-style-type: none"> <li>• No evidence from environmental impacts from agricultural activities.</li> <li>• Changes are vague, unclear and open-ended.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 111		• Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.
Auripo Enterprises Ltd	1017	Oppose submission 306 ref. 111		• Notified permitted activity rule and site standards are adequate. • Changes restrict farming management and at odds with RPW restriction of stock crossing waterways.
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 111		• Would impact on farming operation. • Further submitter is currently undertaking significant measures to address any potential effects on water quality. • Costs of the proposed changes outweigh the benefits.
JH William & KA McNally	1020	Oppose submission 306 ref. 111		• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area. • Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.
RJ McNally	1021			
Kim & Mary Heany	1024			
TJ & NM Arthur	1026	Oppose submission 306 ref. 111		• Hindrance to farming practices and threat to viability of farm. • Implications for maintenance of waterways and farm access, potential damage to farmland and public roads. • Creeks are not in their original beds.
Strath Taieri Community Board	1029	Oppose submission 306 ref. 111		• Too stringent.
Ida Valley Station / Ida Valley Irrigation Co	1033	Oppose submission 306 ref. 111		• The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region. • Would have a huge impact on farming operation. • Further submitter is already taking significant measures to address potential effects on water quality of land-use activities. • Costs of proposed changes outweigh any potential benefits.
Mr RJ Borst	1034	Oppose submission 306 ref. 111		• Proposed changes wide and not supported by evidence of environmental impacts. • Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices. • Sought changes vague, unclear and open-ended. • Requiring consents for structures over the bed of rivers, lakes, regionally significant wetland or in areas of alleged significant aquatic values would have unnecessary cost and bureaucracy and a negative impact on farms' viability. Relevant provisions should remain as notified. • Nothing to be gained from high and costly level of consenting requirements if ORC cannot monitor and enforce. • Proposed changes would require an enormous number of staff to monitor.
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
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Macraes Community Incorporated	1043			
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Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052			
Hawkdun Station	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 111		<ul style="list-style-type: none"> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 111		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> <li>• Requiring consents for structures over the bed of rivers, lakes, regionally significant wetland or in areas of alleged significant aquatic values would have unnecessary cost and bureaucracy and a negative impact on farms' viability. Relevant provisions should remain as notified.</li> <li>• Nothing to be gained from high and costly level of consenting requirements if ORC cannot monitor and enforce.</li> <li>• Proposed changes would require an enormous number of staff to monitor.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 111		<ul style="list-style-type: none"> <li>• Without identified areas, scope of changes and consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> <li>• Removal of flood debris must take place.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 111		<ul style="list-style-type: none"> <li>• Inconsistency with RMA Part II in putting human use values above others.</li> <li>• Extends scope of plan change with considerable impacts on farming.</li> <li>• Inequitable and contrary to RMA, given lack of environment issues.</li> </ul>
TrustPower	1059	Oppose submission 306 ref. 111		<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>• Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>• Should be initiated by the Council.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 111		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306 ref. 111		<ul style="list-style-type: none"> <li>• Oppose new (a)(v).</li> <li>• Oppose introduction of Schedule xx "Significant Aquatic Values" and its use in the rules that it is referred to. Zones 1 &amp; 2 cover significant area of Otago and would reduce the purpose of a permitted activity.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 111		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				• <i>Seek the submission be disallowed.</i>

### 112.1 Section 13.5 - Bed disturbance - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Angus Chapman-Cohen	9	Amend	Allow the clearing of some waterways e.g. drainage where needed. Avoid swamping.	• So improved land does not revert back to swamp.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 9 ref. 112.1</i>		• <i>Ensures weeds don't prevent water flow.</i> • <i>Benefits outweigh harm.</i>
Barry Williams	12	Did not specify	Why are rules [for cleaning creeks and ditches] same as rivers for consents? Why do we require permission from ORC, Fish and Game, DOC, Iwi?	• Had a costly consent for cleaning out a creek.
Alastair Rutherford	105	Amend	Feel distance downstream should stay at 250 m.	• Fine silt in Lindis River colours water easily.
NZ Transport Agency	203	Amend	Amend proposed Rules 13.5.1.1(e), 13.5.1.2(c), 13.5.1.3(c) and 13.5.1.4(c) by adding the words "in any 24 hour period" after the word "duration". The Rules will read: "The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period ; and"  Amend proposed Rules 13.5.1.1(f), 13.5.1.2(d), 13.5.1.3(d) and 13.5.1.4(d) "All reasonable steps are taken to minimise the release of sediment to the lake, river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and"	• Referring to wetted bed is effects-based. • Work will generally occur in daylight hours. 14 hours provides recovery time for affected water body length. • Distance downstream should be related to the size of the water body.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 112.1</i>		• <i>No reasons given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 112.1</i>		• <i>Ensures appropriate recovery time, more realistic timeframes to carry out work.</i>
Trustpower Limited	206	Amend	Regarding Rules 13.5.1.1 to 13.5.1.4: -Adopt the amendments to the conditions proposed relating to the wetland bed or a lake or river. -Remove the amendments relating to mixing distances from the plan change and retain the existing 250 m mixing distance.	• Support amendment relating to work in the wetted bed. • It should not matter if work is not consecutive. • 100 m mixing distance impractical and no justification has been given. • Inconsistent with 12.C prohibited sediment discharges.
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 112.1</i>		• <i>Reasons stated in the submission.</i>
B Landreth Ltd	253	Amend	Stream maintenance / bank stabilisation to maintain water courses be permissible without cost and red tape.	• Stream works needs to be allowed with no red tape and consent costs.
North Otago Irrigation Company	260	Support	Supports the removal of the word 'consecutive' from these rules.	• No reason given.
<i>Waitaki District Council</i>	1003	<i>Support submission 260 ref. 112.1</i>		• <i>Submitter supports removal of word "consecutive".</i>
<i>John Webster</i>	1063	<i>Support submission 260</i>		• <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Peter Mitchell</i>	1064	<i>ref. 112.1</i> <i>Support submission 260</i> <i>ref. 112.1</i>		<ul style="list-style-type: none"> <li>• <i>Support the NOIC submission in full.</i></li> </ul>
Fish and Game (Central South Island)	273	Amend	<p>Include the Schedule identifying areas of significant spawning habitat.</p> <p>Add rules requiring resource consents as follows:  "Zone 1: The grazing of the bed of a waterway in the waterways in the schedule will require a consent, presumably as a restricted discretionary activity, with the discretion restricted to the issue of fish spawning. The notification level should be limited notification."  "Zone 2: The erection of any structure in the scheduled waterways will require activity with the discretion restricted to the issue of fish spawning. The notification level should be limited notification."  Or in the alternative, insert a new rule requiring that resource consents be required for grazing and the erection of structures in waterways that have significant spawning habitat.</p>	<ul style="list-style-type: none"> <li>• Request for creation of two zones.</li> <li>• Information on areas of significant spawning habitat for native and introduced fish will be supplied by DoC and F&amp;G.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 273</i> <i>ref. 112.1</i>		<ul style="list-style-type: none"> <li>• <i>Known ecologically significant stretches should be scheduled and given regard to.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273</i> <i>ref. 112.1</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 273</i> <i>ref. 112.1</i>		<ul style="list-style-type: none"> <li>• <i>Without identifying the areas, the scope of changes and consequential effects cannot be identified.</i></li> <li>• <i>Could require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater, and/or unreasonable constraints in relation to structures.</i></li> <li>• <i>The values are present with the current stock management systems.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 273</i> <i>ref. 112.1</i>		<ul style="list-style-type: none"> <li>• <i>Lack of consultation and justification.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 273</i> <i>ref. 112.1</i>		<ul style="list-style-type: none"> <li>• <i>Areas not provided so no assessment can be made as to possible impacts.</i></li> </ul>

### 112.2 Section 13.5 note box - Alteration of the bed of a lake or river, or of a Regionally Significant Wetland - note

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
NZ Transport Agency	203	Amend	Delete the note under the heading [13.5] and replace with a Rule worded as follows, or to like effect: "The reclamation and deposition of cleanfill associated with works in the bed of a lake or river, or wetland, are addressed through disturbance rules in Section 13.5, and not through discharge rules in Section 12.C."	<ul style="list-style-type: none"> <li>• Guidance note should be expressed as rules to give legal weight.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 203</i> <i>ref. 112.2</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Graylands Farms Ltd	302	Support	Support.	<ul style="list-style-type: none"> <li>If rules regarding alteration of the bed of a lake or river are in one chapter they would be more clear cut to follow.</li> </ul>

### 113 Rule 13.5.1.1 - Disturbance structures permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Amend	Should all be permitted. Delete (e) too restrictive.	<ul style="list-style-type: none"> <li>Repair and maintenance of irrigation systems.</li> <li>Unnecessary, those paying bills will determine.</li> </ul>
Roger Fox	82	Amend	[Distance in Condition (f)] should be 250 m.	<ul style="list-style-type: none"> <li>Depending on water velocity 100m is not realistic.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 82 ref. 113</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li><i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li><i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Ross A & Alexa Wallace	101	Amend	13.5.1.1 (f) Amend 100 m to 250 m.	<ul style="list-style-type: none"> <li>More realistic to allow clarity to meet the required standard.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 101 ref. 113</i>		<ul style="list-style-type: none"> <li><i>No reasonable scientific justification for drop in distance.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 101 ref. 113</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li><i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li><i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Mt Aspiring Station	127	Amend	Amend to a distance of 200 metres.	<ul style="list-style-type: none"> <li>A buffer of 150 to 200 m would differentiate between a permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 127 ref. 113</i>		<ul style="list-style-type: none"> <li><i>No reasonable/scientific justification.</i></li> <li><i>Timeframes need extended.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 127 ref. 113</i>		<ul style="list-style-type: none"> <li><i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 127 ref. 113</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li><i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li><i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Waitaki District Council	138	Support	Support amended rule.	<ul style="list-style-type: none"> <li>Ten consecutive hours was overly restrictive.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 113</i>		<ul style="list-style-type: none"> <li><i>Consistent with DCC position.</i></li> <li><i>Concern about economic and social impact.</i></li> <li><i>Control measures of PC6A go far beyond those required to achieve the stated environmental results.</i></li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 138 ref. 113</i>		<ul style="list-style-type: none"> <li><i>No reasons given.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 138 ref. 113</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li><i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li><i>Neutral on the other specific aspects of the submission.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 113</i>		<ul style="list-style-type: none"> <li>• Areas of concern or support are consistent with those expressed by the NZTA.</li> <li>• Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</li> <li>• Seek the submission is allowed.</li> </ul>
Ernslaw One Ltd	149	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• 100 m stringent compared to other plans, neither sufficient nor realistic in practice.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 149 ref. 113</i>		<ul style="list-style-type: none"> <li>• No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> <li>• Timeframes need extended.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 149 ref. 113</i>		Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 149 ref. 113</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
John Latta	162	Amend	100 metres should be 400 metres.	<ul style="list-style-type: none"> <li>• Very difficult to have no short-term visual clarity impact for only 100m if creating a new culvert.</li> <li>• Short term effect for long-term improvement.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 162 ref. 113</i>		<ul style="list-style-type: none"> <li>• No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 162 ref. 113</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
James Watt	167	Amend	[Amend to] Clarity beyond a distance of 250 m.	<ul style="list-style-type: none"> <li>• 250 m is workable, practical and possible.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 167 ref. 113</i>		<ul style="list-style-type: none"> <li>• No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 167 ref. 113</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	That Rule 13.5.1.1 be redrafted to remove the use of mixing zones.  OR  That Rule 13.5.1.1 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	<ul style="list-style-type: none"> <li>• Supports rule, including reduction in the area of effect to 100 metres, but may be inconsistent with Policy 7.D.1 on removal of mixing zones.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 113</i>		<ul style="list-style-type: none"> <li>• The rule will not work effectively if the requested changes are made.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 197 ref. 113</i>		<ul style="list-style-type: none"> <li>• No scientific basis for 100m area of effect.</li> <li>• Rules unachievable so to strengthen their effects makes them more unachievable.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• Opposes submission insofar as it supports retention of plan change and fails</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 197 ref. 113</i>		<i>to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Oppose submission 197 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms' original submission included that the removal of the provision for mixing zones / reasonable mixing is inconsistent with the RMA and NPSFW, and highlighted inconsistencies in the plan regarding mixing zones.</i></li> <li>• <i>Redrafting of rules to remove the use of mixing zones is opposed by Silver Fern Farms.</i></li> </ul>
<i>Blakely Pacific Limited</i>	<i>209</i>	<i>Amend</i>	<i>Amend rule to increase the reasonable mixing distance to 250 m.</i>	<ul style="list-style-type: none"> <li>• <i>Neither achievable nor realistic in practice.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 209 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m. Needs to be realistic in practice.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 209 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>Dunedin City Council</i>	<i>211</i>	<i>Amend</i>	<p>Amend proposed Rule 13.5.1.1 (e) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;"</p> <p>Amend (f) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and..."</p>	<ul style="list-style-type: none"> <li>• <i>Support work in wetted bed as effects based.</i></li> <li>• <i>Allows 14 hours recovery time.</i></li> <li>• <i>Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.</i></li> </ul>
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support in part submission 211 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Submitter supports removal of word "consecutive" but looks to limit this to within a 24h period.</i></li> </ul>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support submission 211 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Reasons stated in the submission.</i></li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 211 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Clutha District Council</i>	<i>1050</i>	<i>Support submission 211 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 211 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Ensures appropriate recovery time and more realistic timeframes to carry out necessary work.</i></li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 211 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 211 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>reasonable mixing and mixing zones.</i> • <i>Neutral on the other specific aspects of the submission.</i>
Michael O'Connor	234	Amend	Change 100 metres to read 500 metres.	• Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 234 ref. 113</i>		• <i>Greater distances needed; different flows, topography and weather will affect discolouration.</i>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 234 ref. 113</i>		• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i> • <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i> • <i>Neutral on the other specific aspects of the submission.</i>
Silver Fern Farms Limited	238	Support	Retain.	• Provide for mixing zone however, shows inconsistency with other parts of plan.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submission 238 ref. 113</i>		• <i>Submitter supports proposed rules.</i>
<i>Isa Holdings Ltd</i>	<i>1058</i>	<i>Support in part submission 238 ref. 113</i>		<i>Supports mixing zones being included in the plan.</i>
B Landreth Ltd	253	Did not specify	An approved style of ware be permissible to drive low cost pumps but also allowing water wildlife to move safely up a bypass and that this be available without consent cost.	• Restricting stock access to water means stock water supply scheme is needed. • To set up scheme we need ability to construct wares or water races to drive water rams etc while not restricting access for aquatic life. • Need to be able to be able to meet Rule 13.5.1.8A as easily as possible with no red tape or consent expense.
Rayonier New Zealand Ltd	256	Amend	Amend the Rule to increase the reasonable mixing distance to 250 m.	• Reduction to 100 m is not achievable or realistic.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 256 ref. 113</i>		• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 256 ref. 113</i>		• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i> • <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i> • <i>Neutral on the other specific aspects of the submission.</i>
Forest and Bird	271	Amend	"Amend to read: (i) Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or its margins."  Add: "(j) The activity does not occur in a Regionally Significant Wetland or a wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX."	• Rule as proposed has potential to adversely affect ecological functioning and values of water bodies. • Need to protect RSWs and their margins.
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose submission 271 ref. 113</i>		• <i>Not all waterways need to be enhanced.</i> • <i>Requiring resource consent for structures in Regionally Significant Wetland is inappropriate and unnecessary.</i> • <i>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Contact Energy Limited	1013	Oppose submission 271 ref. 113		<ul style="list-style-type: none"> <li>Suggested new criterion (j) is too uncertain to be a condition on a permitted activity rule.</li> </ul>
Mr RJ Borst	1034	Oppose submission 271 ref. 113		<ul style="list-style-type: none"> <li>Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</li> <li>Background data required before any steps are taken to restrict agricultural activities.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Oppose submission 271 ref. 113		<ul style="list-style-type: none"> <li>Plan Change 2 determined regionally significant wetlands.</li> <li>No scientific justification for extending to 'margins'.</li> </ul>
TrustPower	1059	Oppose submission 271 ref. 113		Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.
Glenshee Station Limited	1062	Oppose submission 271 ref. 113		Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.
Federated Farmers of New Zealand	278	Amend	Adopt the rule and: - amend time to 20 hours - retain 250 metre mixing zone for visual clarity	<ul style="list-style-type: none"> <li>10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works.</li> <li>There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water quality.</li> </ul>
Albert McTainsh	1004	Support submission 278 ref. 113		Practical and workable alternatives, solutions and suggestions.
Forest and Bird NZ	1007	Oppose submission 278 ref. 113		250 m mixing zone is no longer appropriate in order to maintain or improve water quality.
Hopefield Investments Ltd	1019	Support submission 278 ref. 113		<ul style="list-style-type: none"> <li>Operation relies on natural streams for continuing viability.</li> <li>Plan change has huge impact on farming business.</li> <li>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
Strath Taieri Community Board	1029	Support		No reason given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 278 ref. 113</i>		
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 113</i>		<i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i></li> <li>• <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 278 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>Wenita Forest Products</i>	279	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• <i>100 m is very stringent compared to other plans, neither achievable or realistic in practice.</i></li> </ul>
<i>New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section</i>	282			
<i>City Forests Limited</i>	283			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 279, 282 &amp; 283 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submissions 279, 282 &amp; 283 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 283 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>Paterson Pitts Partners Ltd</i>	288	Amend	Rule 13.5.1 (e) should read: "The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 20 hours (non consecutive) in duration and the works in the wetted area are completed within two weeks of commencement".	<ul style="list-style-type: none"> <li>• <i>Change to Condition (e) makes a crossing easier.</i></li> <li>• <i>10 hours (non-consecutive) may be insufficient.</i></li> <li>• <i>Rule is too open-ended as to total time for completion (non-completed culvert could be left indefinitely).</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 288 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Support robust timeframe.</i></li> <li>• <i>10 hours arbitrary, 20 hours more appropriate.</i></li> <li>• <i>Should be about cumulative effects.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 288 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Southern Wood Council	289	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• 100 m is very stringent compared to other plans, neither achievable nor realistic in practice.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 289 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 289 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 289 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Beaton Family	291	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 291 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Support more robust timeframe for carrying out work.</i></li> <li>• <i>10 hours arbitrary, should be about cumulative effects of the activity on the bed. 20 hours more appropriate.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 291 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Graylands Farms Ltd	302	Amend	We oppose the change to (f) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	<ul style="list-style-type: none"> <li>• 100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 302 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 302 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
The Director-General of Conservation	306	Amend	That 13.5.1.1 be amended as follows, or to like effect: The disturbance of the bed of any lake or river, or any Regionally Significant Wetland, associated with: (i)-(iii) is a permitted activity, providing: (a)- (h); and (i) Except for activities covered by Rules 13.2.1.5, 13.2.1.6 or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland. (j) Such activities do not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	<ul style="list-style-type: none"> <li>• The physical removal of exotic pest plants should be permitted.</li> <li>• Significant aquatic values can be adversely affected by the erection or placement of structures.</li> <li>• The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>• Including new Schedule of areas provides greater clarity.</li> <li>• Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 113</i>		<ul style="list-style-type: none"> <li>• <i>Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</i></li> <li>• <i>Prevents normal and safe access to properties.</i></li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Negative implications for stormwater control and maintenance works (clearance of storm debris).</li> <li>Approach does not acknowledge local environmental conditions.</li> <li>Contrary to the purpose of the RMA.</li> </ul>
Forest and Bird NZ	1007	Support submission 306 ref. 113		<ul style="list-style-type: none"> <li>Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>
DJ & KR Scott	1008	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
Craiglea Limited	1012	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>No evidence from environmental impacts from agricultural activities.</li> <li>Changes are vague, unclear and open-ended.</li> <li>Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</li> </ul>
Contact Energy Limited	1013	Oppose in part submission 306 ref. 113		<ul style="list-style-type: none"> <li>Submission reserves the ability to expand the area of "significant aquatic values" beyond the areas shown on maps.</li> <li>Submission is then ultra vires for failing to adequately specify the relief sought.</li> </ul>
Auripo Enterprises Ltd	1017	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Should be allowed minimal disturbance to repair or erect structure.</li> </ul>
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Would impact on farming operation.</li> <li>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>Costs of the proposed changes outweigh the benefits.</li> </ul>
JH William & KA McNally	1020	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
RJ McNally	1021			
Kim & Mary Heany	1024			
Dunedin City Council	1025	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Many small structures can be erected with minimal adverse environmental effect.</li> </ul>
TJ & NM Arthur	1026	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Hindrance to farming practices and threat to viability of farm.</li> <li>Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>Creeks are not in their original beds.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Too stringent.</li> </ul>
Ida Valley Station / Ida Valley Irrigation Co	1033	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</li> <li>Would have a huge impact on farming operation.</li> <li>Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</li> <li>Costs of proposed changes outweigh any potential benefits.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Dunedin International Airport Limited</i>	1038			<i>practices.</i> <ul style="list-style-type: none"> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
<i>Hawkdun Station</i>	1053			
<i>Central Otago Wine Growers Association</i>	1054	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>• Without identified areas, scope of changes and consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> <li>• Removal of flood debris must take place.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>• Inconsistency with RMA Part II in putting human use values above others.</li> <li>• Extends scope of plan change with considerable impacts on farming.</li> <li>• Inequitable and contrary to RMA, given lack of environment issues.</li> </ul>
<i>TrustPower</i>	1059	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>• Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
<i>TrustPower</i>	1059	Oppose submission 306		<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 113		<ul style="list-style-type: none"> <li>Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>Should be initiated by the Council.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Oppose new (j).</li> <li>Oppose introduction of Schedule xx "Significant Aquatic Values" and its use in the rules that it is referred to. Zones 1 &amp; 2 cover significant area of Otago and would reduce the purpose of a permitted activity.</li> </ul>
The NZ Transport Agency	1073	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</li> <li>Seeks that the submission be disallowed.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 113		<ul style="list-style-type: none"> <li>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>Rules fail relevant tests under section 32 RMA.</li> <li>Additional controls not justified in terms of effects.</li> <li>Seek the submission be disallowed.</li> </ul>

#### 114 Rule 13.5.1.2 - Disturbance storm event permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Amend	Should all be permitted. Delete (c) too restrictive.	<ul style="list-style-type: none"> <li>Repair and maintenance of irrigation systems.</li> <li>Unnecessary, those paying bills will determine.</li> </ul>
B R Philpott	71	Support	Provide a more permissive approach to repair work of bridges and other crossings.	<ul style="list-style-type: none"> <li>Flexibility needed to enable disturbance of banks and waterways during repair work e.g. repairing flood damage.</li> </ul>
Waitaki District Council	1003	Support submission 71 ref. 114		<ul style="list-style-type: none"> <li>Submitter supports proposed rules.</li> </ul>
Simon Davies	72	Amend	Needs to be amended [to say "including alluvium" rather than "excluding alluvium"].	<ul style="list-style-type: none"> <li>Alluvium build-up causes damming, subsequently flooding paddocks.</li> <li>Flood water picks up contaminants and sediment.</li> <li>Needs ability to maintain flood flow capacity of waterways.</li> <li>Need tools to maintain waterways, then they can be fenced off. Protects waterway and water quality, but only if the water stays in the waterway.</li> </ul>
Roger Fox	82	Amend	Should include alluvium.	<ul style="list-style-type: none"> <li>Alluvium can restrict flood carrying capacity of the bed.</li> </ul>
Ross A & Alexa Wallace	101	Amend	13.5.1.2 (d) Amend 100 m to 250 m.	<ul style="list-style-type: none"> <li>More realistic to allow clarity to meet the required standard.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 101 ref. 114		<ul style="list-style-type: none"> <li>No reasonable scientific justification for drop in distance.</li> </ul>
Mt Aspiring Station	127	Amend	Amend to a distance of 200 metres.	<ul style="list-style-type: none"> <li>A buffer of 150 to 200 m would differentiate between a permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects.</li> </ul>
TrustPower	1059	Support submission 127 ref. 114		<ul style="list-style-type: none"> <li>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
Waitaki District Council	138	Support	Support amended rule.	<ul style="list-style-type: none"> <li>Ten consecutive hours was overly restrictive.</li> </ul>
Dunedin City Council	1025	Support submission 138		<ul style="list-style-type: none"> <li>Consistent with DCC position.</li> <li>Concern about economic and social impact.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 114</i>		<ul style="list-style-type: none"> <li>Control measures of PC6A go far beyond those required to achieve the stated environmental results.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 138 ref. 114</i>		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 114</i>		<ul style="list-style-type: none"> <li>Areas of concern or support are consistent with those expressed by the NZTA.</li> <li>Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</li> <li>Seek the submission is allowed.</li> </ul>
John Latta	162	Amend	100 metres should be 400 metres.	<ul style="list-style-type: none"> <li>Very difficult to remove material and not impact short-term visual clarity.</li> <li>Where possible, mechanical cleaning should work down the stream, not up it.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 162 ref. 114</i>		<ul style="list-style-type: none"> <li>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
James Watt	167	Amend	[Amend to] Clarity beyond a distance of 250 m.	<ul style="list-style-type: none"> <li>250 m is workable, practical and possible.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 167 ref. 114</i>		<ul style="list-style-type: none"> <li>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
Lovells Creek Farm Ltd	189	Amend	Amend rule to a distance of 250 metres downstream.	<ul style="list-style-type: none"> <li>More realistic value.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 189 ref. 114</i>		<ul style="list-style-type: none"> <li>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	That Rule 13.5.1.2 be redrafted to remove the use of mixing zones.  OR  That Rule 13.5.1.2 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	<ul style="list-style-type: none"> <li>Supports rule, including reduction in the area of effect to 100 metres, but rule may be inconsistent with Policy 7.D.1 on removal of mixing zones.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 114</i>		<ul style="list-style-type: none"> <li>The rule will not work effectively if the requested changes are made.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 197 ref. 114</i>		<ul style="list-style-type: none"> <li>No scientific basis for 100m area of effect.</li> <li>Rules unachievable so to strengthen their effects makes them more unachievable.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 114</i>		<ul style="list-style-type: none"> <li>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
Dunedin City Council	211	Amend	Amend proposed Rule 13.5.1.2 (c) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;..."  Amend (d) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and..."	<ul style="list-style-type: none"> <li>Support work in wetted bed as effects based.</li> <li>Allows 14 hours recovery time.</li> <li>Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support in part</i>		<ul style="list-style-type: none"> <li>Submitter supports removal of word "consecutive" but looks to limit this to</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		submission 211 ref. 114		within a 24h period.
Contact Energy Limited	1013	Support submission 211 ref. 114		• Reasons stated in the submission.
Strath Taieri Community Board	1029	Support submission 211 ref. 114		• No reason given.
Clutha District Council	1050	Support submission 211 ref. 114		• Agree with submissions in relation to bed disturbance.
Central Otago District Council	1051	Support submission 211 ref. 114		• Agree with submissions in relation to bed disturbance.
Central Otago Wine Growers Association	1054	Support submission 211 ref. 114		• Agree with submissions in relation to bed disturbance.
Federated Farmers of New Zealand	1057	Support submission 211 ref. 114		• Ensures appropriate recovery time and more realistic timeframes to carry out necessary work.
TrustPower	1059	Support submission 211 ref. 114		Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.
Michael O'Connor	234	Amend	Change 100 metres to read 500 metres.	• Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.
Federated Farmers of New Zealand	1057	Support in part submission 234 ref. 114		• Greater distances needed; different flows, topography and weather will affect discolouration.
Silver Fern Farms Limited	238	Support	Retain.	• Provide for mixing zone however, shows inconsistency with other parts of plan.
Waitaki District Council	1003	Support submission 238 ref. 114		• Submitter supports proposed rules.
Isa Holdings Ltd	1058	Support in part submission 238 ref. 114		• Supports mixing zones being included in the plan.
Federated Farmers of New Zealand	278	Amend	Adopt the rule and: - amend time to 20 hours - retain 250 metre mixing zone for visual clarity	• 10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works. • There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water quality.
Albert McTainsh	1004	Support submission 278 ref. 114		• Practical and workable alternatives, solutions and suggestions.
Forest and Bird NZ	1007	Oppose submission 278 ref. 114		• 250 m mixing zone is no longer appropriate in order to maintain or improve water quality.
Hopefield Investments Ltd	1019	Support submission 278 ref. 114		• Operation relies on natural streams for continuing viability. • Plan change has huge impact on farming business. • Plan change does not differentiate between intensive farming and extensive pastoral grazing.
Strath Taieri Community Board	1029	Support		• No reason given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 278 ref. 114</i>		
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 114</i>		<ul style="list-style-type: none"> <li>• Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 114</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
Beaton Family	291	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 291 ref. 114</i>		<ul style="list-style-type: none"> <li>• Support more robust timeframe for carrying out work.</li> <li>• 10 hours arbitrary, should be about cumulative effects of the activity on the bed. 20 hours more appropriate.</li> </ul>
Graylands Farms Ltd	302	Amend	We oppose the change to (d) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	<ul style="list-style-type: none"> <li>• 100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 302 ref. 114</i>		<ul style="list-style-type: none"> <li>• No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
The Director-General of Conservation	306	Amend	That 13.5.1.2 be amended as follows, or to like effect: The disturbance of the bed of any river for the purpose of clearing any material that has accumulated as a result of a storm event, excluding alluvium, in order to maintain the flood carrying capacity of the bed of the river, is a permitted activity, providing: (a)-(f) (g) Such activities do not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	<ul style="list-style-type: none"> <li>• Significant aquatic values can be adversely affected by clearing material.</li> <li>• The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>• Including new Schedule of areas provides greater clarity.</li> <li>• Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</li> <li>• Negative implications for stormwater control and maintenance works (clearance of storm debris).</li> <li>• Approach does not acknowledge local environmental conditions.</li> <li>• Contrary to the purpose of the RMA.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>
<i>DJ &amp; KR Scott</i>	1008	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>• Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• No evidence from environmental impacts from agricultural activities.</li> <li>• Changes are vague, unclear and open-ended.</li> <li>• Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Oppose in part submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Submission reserves the ability to expand the area of "significant aquatic values" beyond the areas shown on maps.</li> <li>• Submission is then ultra vires for failing to adequately specify the relief</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>sought.</i>
<i>Auripo Enterprises Ltd</i>	1017	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Weeds will build up and block waterway.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Would impact on farming operation.</i></li> <li><i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li><i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>JH William &amp; KA McNally</i>	1020	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</i></li> <li><i>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</i></li> </ul>
<i>RJ McNally</i>	1021			
<i>Kim &amp; Mary Heany</i>	1024			
<i>Dunedin City Council</i>	1025	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Many small structures can be erected with minimal adverse environmental effect.</i></li> </ul>
<i>TJ &amp; NM Arthur</i>	1026	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Hindrance to farming practices and threat to viability of farm.</i></li> <li><i>Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</i></li> <li><i>Creeks are not in their original beds.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Too stringent.</i></li> </ul>
<i>Ida Valley Station / Ida Valley Irrigation Co</i>	1033	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</i></li> <li><i>Would have a huge impact on farming operation.</i></li> <li><i>Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</i></li> <li><i>Costs of proposed changes outweigh any potential benefits.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Proposed changes wide and not supported by evidence of environmental impacts.</i></li> <li><i>Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</i></li> <li><i>Sought changes vague, unclear and open-ended.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li><i>Proposed changes wide and not supported by evidence of environmental impacts.</i></li> <li><i>Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</i></li> <li><i>Sought changes vague, unclear and open-ended.</i></li> </ul>
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
<i>Hawkdun Station</i>	1053			
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Without identified areas, scope of changes and consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> <li>• Removal of flood debris must take place.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Inconsistency with RMA Part II in putting human use values above others.</li> <li>• Extends scope of plan change with considerable impacts on farming.</li> <li>• Inequitable and contrary to RMA, given lack of environment issues.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>• Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>• Should be initiated by the Council.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>Hawkdun Idaburn Irrigation Company Limited</i>	1066	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Oppose new (g).</li> <li>• Oppose introduction of Schedule xx "Significant Aquatic Values" and its use in the rules that it is referred to. Zones 1 &amp; 2 cover significant area of Otago and would reduce the purpose of a permitted activity.</li> <li>• The Hawkdun Idaburn Irrigation Company Limits collect water from 60 intakes and often needs to take rapid action after flood events to maintain water flows for stock, domestic and irrigation purposes.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>The NZ Transport Agency</i>	1073	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</li> <li>• Seeks that the submission be disallowed.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 114</i>		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>

### 115 Rule 13.5.1.3 - Disturbance reclamation, deposition permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mt Aspiring Station</i>	127	Amend	Amend to a distance of 200 metres.  Amend time limit to 20 hours.	<ul style="list-style-type: none"> <li>• Buffer of 150 to 200 m would differentiate between permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects.</li> <li>• Works often exceeds 10 hours due to complexity of the task.</li> <li>• Unlikely farmers will get required machinery in for only 1 day, 2 days more appropriate.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 127 ref. 115</i>		<ul style="list-style-type: none"> <li>• Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 127 ref. 115</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
<i>Waitaki District Council</i>	138	Support	Support amended rule.	<ul style="list-style-type: none"> <li>• Ten consecutive hours was overly restrictive.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 115</i>		<ul style="list-style-type: none"> <li>• Consistent with DCC position.</li> <li>• Concern about economic and social impact.</li> <li>• Control measures of PC6A go far beyond those required to achieve the stated environmental results.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 138 ref. 115</i>		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 138 ref. 115</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 115</i>		<ul style="list-style-type: none"> <li>• Areas of concern or support are consistent with those expressed by the NZTA.</li> <li>• Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</li> <li>• Seek the submission is allowed.</li> </ul>
<i>Ernslaw One Ltd</i>	149	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• 100 m stringent compared to other plans, neither sufficient nor realistic in practice.</li> </ul>
<i>Federated Farmers of New</i>	1057	Support		<ul style="list-style-type: none"> <li>• No reasonable justification or scientific basis for dropping distance from 250m</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 149 ref. 115</i>		<i>to 100m.</i> • <i>Timeframes need extended.</i>
<i>TrustPower</i>	1059	<i>Support submission 149 ref. 115</i>		• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 149 ref. 115</i>		• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i> • <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i> • <i>Neutral on the other specific aspects of the submission.</i>
James Watt	167	Amend	[Amend to] Clarity beyond a distance of 250 m.	• 250 m is workable, practical and possible.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 167 ref. 115</i>		• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 167 ref. 115</i>		• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i> • <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i> • <i>Neutral on the other specific aspects of the submission.</i>
Lovells Creek Farm Ltd	189	Amend	Amend rule to a distance of 250 metres downstream.	• More realistic value.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 189 ref. 115</i>		• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 189 ref. 115</i>		• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i> • <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i> • <i>Neutral on the other specific aspects of the submission.</i>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	That Rule 13.5.1.3 be redrafted to remove the use of mixing zones.  OR  That Rule 13.5.1.3 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	• Supports rule, including reduction in the area of effect to 100 metres, but rule may be inconsistent with Policy 7.D.1 on removal of mixing zones.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 115</i>		• <i>The rule will not work effectively if the requested changes are made.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 197 ref. 115</i>		• <i>No scientific basis for 100m area of effect.</i> • <i>Rules unachievable so to strengthen their effects makes them more unachievable.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 115</i>		• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 197 ref. 115</i>		• <i>Silver Fern Farms' original submission included that removal of provision for mixing zones / reasonable mixing is inconsistent with RMA and NPSFW and also highlighted inconsistencies in the plan regarding mixing zones.</i> • <i>Redrafting of rules to remove the use of mixing zones is therefore opposed by Silver Fern Farms.</i>
Blakely Pacific Limited	209	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	• Neither achievable nor realistic in practice.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 209</i>		• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m. Needs to be realistic in practice.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 115</i>		
Dunedin City Council	211	Amend	Amend proposed Rule 13.5.1.3 (c) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;..."  Amend (d) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and..."	<ul style="list-style-type: none"> <li>• Support work in wetted bed as effects based.</li> <li>• Allows 14 hours recovery time.</li> <li>• Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Submitter supports removal of word "consecutive" but looks to limit this to within a 24h period.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Central Otago District Council</i>	1051	<i>Support submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Ensures appropriate recovery time and more realistic timeframes to carry out necessary work.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 211 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Michael O'Connor	234	Amend	Change 100 metres to read 500 metres.	<ul style="list-style-type: none"> <li>• <i>Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 234 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Greater distances needed; different flows, topography and weather will affect discolouration.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 234 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Silver Fern Farms Limited	238	Support	Retain.	<ul style="list-style-type: none"> <li>• <i>Provide for mixing zone however, shows inconsistency with other parts of plan.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Waitaki District Council</i>	1003	<i>Support submission 238 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Submitter supports proposed rules.</i></li> </ul>
<i>Isa Holdings Ltd</i>	1058	<i>Support in part submission 238 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Supports mixing zones being included in the plan.</i></li> </ul>
Rayonier New Zealand Ltd	256	Amend	Amend the Rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• Reduction to 100 m is not achievable or realistic.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 256 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 256 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Forest and Bird	271	Amend	<p>Delete the words "any Regionally Significant Wetland"</p> <p>Add to (h): "Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or its margins."</p> <p>Add: "(i) The activity does not occur in a Regionally Significant Wetland or a wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXX."</p>	<ul style="list-style-type: none"> <li>• Rule as proposed has potential to adversely affect ecological functioning and values of water bodies.</li> <li>• Need to protect RSWs and their margins.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</i></li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 271 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Suggested new criterion (j) is too uncertain to be a condition on a permitted activity rule.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</i></li> <li>• <i>Background data required before any steps are taken to restrict agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mr J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change 2 determined regionally significant wetlands.</i></li> <li>• <i>No scientific justification for extending to 'margins'.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 271 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
Federated Farmers of New Zealand	278	Amend	Adopt the rule and: - amend time to 20 hours - retain 250 metre mixing zone for visual clarity	<ul style="list-style-type: none"> <li>• 10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works.</li> <li>• There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water quality.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Practical and workable alternatives, solutions and suggestions.</i></li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>250 m mixing zone is no longer appropriate in order to maintain or improve water quality.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Operation relies on natural streams for continuing viability.</i></li> <li>• <i>Plan change has huge impact on farming business.</i></li> <li>• <i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i></li> <li>• <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 278 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Wenita Forest Products	279	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• 100 m is very stringent compared to other plans, neither achievable or realistic in practice.</li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282			
City Forests Limited	283			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Southern Wood Council	289			
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submissions 279, 282 &amp; 283 ref. 115</i>		<ul style="list-style-type: none"> <li>Plan change should recognise the specific nature of plantation forestry.</li> <li>Rules relating to bed disturbance for crossing installation require amendment.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 279, 282, 283 and 289 ref. 115</i>		<ul style="list-style-type: none"> <li>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submissions 279, 282, 283 and 289 ref. 115</i>		<i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submissions 279, 282, 283 and 289 ref. 115</i>		<ul style="list-style-type: none"> <li>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>Neutral on the other specific aspects of the submission.</li> </ul>
Beaton Family	291	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 291 ref. 115</i>		<ul style="list-style-type: none"> <li>Support more robust timeframe for carrying out work.</li> <li>10 hours arbitrary, should be about cumulative effects of the activity on the bed, 20 hours more appropriate.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 291 ref. 115</i>		<ul style="list-style-type: none"> <li>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>Neutral on the other specific aspects of the submission.</li> </ul>
Graylands Farms Ltd	302	Amend	We oppose the change to (d) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	<ul style="list-style-type: none"> <li>100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 302 ref. 115</i>		<ul style="list-style-type: none"> <li>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 302 ref. 115</i>		<ul style="list-style-type: none"> <li>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>Neutral on the other specific aspects of the submission.</li> </ul>
The Director-General of Conservation	306	Amend	That 13.5.1.3 be amended as follows, or to like effect: The disturbance or reclamation of, or the deposition of any substance in, on or under, either the bed of any lake or river, or any Regionally Significant Wetland, for the purpose of: (i)-(ii) is a permitted activity providing: (a)-(g) (h) Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological	<ul style="list-style-type: none"> <li>The physical removal of exotic pest plants should be permitted.</li> <li>Significant aquatic values can be adversely affected by reclamation or deposition of materials into waterways.</li> <li>The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>Including new Schedule of areas provides greater clarity.</li> <li>Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland. (i) Such activities do not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	
ME Elston	1002	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</li> <li>Negative implications for stormwater control and maintenance works (clearance of storm debris).</li> <li>Approach does not acknowledge local environmental conditions.</li> <li>Contrary to the purpose of the RMA.</li> </ul>
Forest and Bird NZ	1007	Support submission 306 ref. 115		<ul style="list-style-type: none"> <li>Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>
DJ & KR Scott	1008	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
Craiglea Limited	1012	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>No evidence from environmental impacts from agricultural activities.</li> <li>Changes are vague, unclear and open-ended.</li> <li>Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</li> </ul>
Contact Energy Limited	1013	Oppose in part submission 306 ref. 115		<ul style="list-style-type: none"> <li>Submission reserves the ability to expand the area of "significant aquatic values" beyond the areas shown on maps.</li> <li>Submission is then ultra vires for failing to adequately specify the relief sought.</li> </ul>
Auripo Enterprises Ltd	1017	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Relief must be provided to mitigate and repair flood damage.</li> </ul>
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Would impact on farming operation.</li> <li>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>Costs of the proposed changes outweigh the benefits.</li> </ul>
JH William & KA McNally	1020	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
RJ McNally	1021			
Kim & Mary Heany	1024			
Dunedin City Council	1025	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Many small structures can be erected with minimal adverse environmental effect.</li> </ul>
TJ & NM Arthur	1026	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Hindrance to farming practices and threat to viability of farm.</li> <li>Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>Creeks are not in their original beds.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>Too stringent.</li> </ul>
Ida Valley Station / Ida Valley Irrigation Co	1033	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</li> <li>Would have a huge impact on farming operation.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</li> <li>• Costs of proposed changes outweigh any potential benefits.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 115		<ul style="list-style-type: none"> <li>• Without identified areas, scope of changes and consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> <li>• Removal of flood debris must take place.</li> </ul>
Federated Farmers of New	1057	Oppose		<ul style="list-style-type: none"> <li>• Inconsistency with RMA Part II in putting human use values above others.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Extends scope of plan change with considerable impacts on farming.</li> <li>• Inequitable and contrary to RMA, given lack of environment issues.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>• Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>• Should be initiated by the Council.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>Hawkdun Idaburn Irrigation Company Limited</i>	1066	<i>Oppose submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Oppose new (i).</li> <li>• Oppose introduction of Schedule xx "Significant Aquatic Values" and its use in the rules that it is referred to. Zones 1 &amp; 2 cover significant area of Otago and would reduce the purpose of a permitted activity.</li> <li>• The Hawkdun Idaburn Irrigation Company Limits collect water from 60 intakes and often needs to take rapid action after flood events to maintain water flows for stock, domestic and irrigation purposes.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Oppose submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</li> <li>• Seeks that the submission be disallowed.</li> </ul>
<i>Snowline Ltd</i>	1076	<i>Oppose submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Seeks to prohibit what council deems to be a permitted activity on land DOC has not yet defined.</li> <li>• Notified rule already protects indigenous flora, fauna or its habitat.</li> <li>• Need for clarification of the term "structure" in the glossary.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 115</i>		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>
Central Otago District Council & Clutha District Council	309	Support	Support.	<ul style="list-style-type: none"> <li>• Will make maintenance work easier to manage without increase in adverse effects.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 309 ref. 115</i>		<ul style="list-style-type: none"> <li>• Submitter supports proposed rules.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 115</i>		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 115</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 115</i>		<ul style="list-style-type: none"> <li>• Support that changes prevent effects of discharges being assessed on case by case basis.</li> <li>• Agree prohibited status should be removed.</li> <li>• Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable.</li> <li>• Support that reasonable mixing be provided for.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 309 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 115</i>		<ul style="list-style-type: none"> <li>• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i></li> </ul>

#### 116 Rule 13.5.1.4 - Disturbance reinstatement permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mt Aspiring Station	127	Amend	Amend to a distance of 200 metres.  Amend time limit to 20 hours.	<ul style="list-style-type: none"> <li>• Buffer of 150 to 200 m would differentiate between permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects.</li> <li>• Works often exceeds 10 hours due to complexity of the task.</li> <li>• Unlikely farmers will get required machinery in for only 1 day, 2 days more appropriate.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 127 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 127 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Waitaki District Council	138	Support	Support amended rule.	<ul style="list-style-type: none"> <li>• Ten consecutive hours was overly restrictive.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with DCC position.</i></li> <li>• <i>Concern about economic and social impact.</i></li> <li>• <i>Control measures of PC6A go far beyond those required to achieve the stated environmental results.</i></li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 138 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 138 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Areas of concern or support are consistent with those expressed by the NZTA.</i></li> <li>• <i>Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</i></li> <li>• <i>Seek the submission is allowed.</i></li> </ul>
Ernslaw One Ltd	149	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• 100 m stringent compared to other plans, neither sufficient nor realistic in practice.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 149 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> <li>• <i>Timeframes need extended.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of</i></li> </ul>

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		<i>submission 149 ref. 116</i>		<i>the bed, providing that provision is made for a reasonable mixing zone.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 149 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>John Latta</i>	162	Amend	100 metres should be 500 metres.	<ul style="list-style-type: none"> <li>• 100 too short for temporary visual clarity impact if major remedial work required.</li> <li>• Flood mitigation work may be required, overall downstream effect less than subsequent flood erosion/deposition.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 162 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 162 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>Lovells Creek Farm Ltd</i>	189	Amend	Amend rule to a distance of 250 metres downstream.	<ul style="list-style-type: none"> <li>• More realistic value.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 189 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 189 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	197	Amend	That Rule 13.5.1.4 be redrafted to remove the use of mixing zones.  OR  That Rule 13.5.1.4 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	<ul style="list-style-type: none"> <li>• Supports rule, including reduction in the area of effect to 100 metres, but rule may be inconsistent with Policy 7.D.1 on removal of mixing zones.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>The rule will not work effectively if the requested changes are made.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 197 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>No scientific basis for 100m area of effect.</i></li> <li>• <i>Rules unachievable so to strengthen their effects makes them more unachievable.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 197 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms' original submission included that removal of provision for mixing zones / reasonable mixing is inconsistent with RMA and NPSFW and also highlighted inconsistencies in the plan regarding mixing zones.</i></li> <li>• <i>Redrafting of rules to remove the use of mixing zones is therefore opposed by Silver Fern Farms.</i></li> </ul>
<i>Blakely Pacific Limited</i>	209	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• Neither achievable nor realistic in practice.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 209</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m. Needs to be realistic in practice.</i></li> </ul>

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<i>Silver Fern Farms Limited</i>	1070	<i>ref. 116</i> <i>Support in part submission 209 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Dunedin City Council	211	Amend	<p>Amend proposed Rule 13.5.1.4 (c) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;..."</p> <p>Amend (d) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and..."</p>	<ul style="list-style-type: none"> <li>• Support work in wetted bed as effects-based.</li> <li>• Allows 14 hours recovery time.</li> <li>• Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Submitter supports removal of word "consecutive" but looks to limit this to within a 24h period.</i></li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Reasons stated in the submission.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Central Otago District Council</i>	1051	<i>Support submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Ensures appropriate recovery time and more realistic timeframes to carry out necessary work.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 211 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Michael O'Connor	234	Amend	Change 100 metres to read 500 metres.	<ul style="list-style-type: none"> <li>• Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 234</i>		<ul style="list-style-type: none"> <li>• <i>Greater distances needed; different flows, topography and weather will affect discolouration.</i></li> </ul>

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<i>Silver Fern Farms Limited</i>	1070	<i>ref. 116</i> <i>Support in part submission 234 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Silver Fern Farms Limited	238	Support	Retain.	<ul style="list-style-type: none"> <li>• Provide for mixing zone however, shows inconsistency with other parts of plan.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 238 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Submitter supports proposed rules.</i></li> </ul>
<i>Isa Holdings Ltd</i>	1058	<i>Support in part submission 238 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Supports mixing zones being included in the plan.</i></li> </ul>
Rayonier New Zealand Ltd	256	Amend	Amend the Rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> <li>• Reduction to 100 m is not achievable or realistic.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 256 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>No reasonable justification or scientific basis for dropping distance from 250m to 100m.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 256 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</i></li> <li>• <i>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</i></li> <li>• <i>Neutral on the other specific aspects of the submission.</i></li> </ul>
Forest and Bird	271	Amend	<p>Add:</p> <p>"(h) there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or its margins."</p> <p>"(i) The activity does not occur in an area identified in Schedule "Significant Aquatic Values" or is not a Regionally Significant Wetland or a wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXX."</p>	<ul style="list-style-type: none"> <li>• Rule as proposed has potential to adversely affect ecological functioning and values of water bodies.</li> <li>• Need to protect RSWs and their margins.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</i></li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 271 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Suggested new criterion (j) is too uncertain to be a condition on a permitted activity rule.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 116</i>		<ul style="list-style-type: none"> <li>• <i>Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</i></li> <li>• <i>Background data required before any steps are taken to restrict agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			

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Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Oppose submission 271 ref. 116		<ul style="list-style-type: none"> <li>Plan Change 2 determined regionally significant wetlands.</li> <li>No scientific justification for extending to 'margins'.</li> </ul>
TrustPower	1059	Oppose submission 271 ref. 116		Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.
Glenshee Station Limited	1062	Oppose submission 271 ref. 116		<ul style="list-style-type: none"> <li>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
Federated Farmers of New Zealand	278	Amend	Adopt the rule and: - amend time to 20 hours. - retain 250 metre mixing zone for visual clarity.	<ul style="list-style-type: none"> <li>10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works.</li> <li>There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water quality.</li> </ul>
Albert McTainsh	1004	Support submission 278 ref. 116		<ul style="list-style-type: none"> <li>Practical and workable alternatives, solutions and suggestions.</li> </ul>
Forest and Bird NZ	1007	Oppose submission 278 ref. 116		250 m mixing zone is no longer appropriate in order to maintain or improve water quality.
Hopefield Investments Ltd	1019	Support submission 278 ref. 116		<ul style="list-style-type: none"> <li>Operation relies on natural streams for continuing viability.</li> <li>Plan change has huge impact on farming business.</li> <li>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
Strath Taieri Community Board	1029	Support submission 278 ref. 116		No reason given.
TrustPower	1059	Support submission 278 ref. 116		Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.
Glenshee Station Limited	1062	Support in part submission 278 ref. 116		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
Silver Fern Farms Limited	1070	Support in part submission 278 ref. 116		<ul style="list-style-type: none"> <li>Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>Neutral on the other specific aspects of the submission.</li> </ul>
Wenita Forest Products	279	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	100 m is very stringent compared to other plans, neither achievable or

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New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282			realistic in practice.
City Forests Limited	283			
Southern Wood Council	289			
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submissions 279, 282 &amp; 283 ref. 116</i>		<ul style="list-style-type: none"> <li>• Plan change should recognise the specific nature of plantation forestry.</li> <li>• Rules relating to bed disturbance for crossing installation require amendment.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 279, 282, 283 and 289 ref. 116</i>		<ul style="list-style-type: none"> <li>• No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submissions 279, 282, 283 and 289 ref. 116</i>		<ul style="list-style-type: none"> <li>• Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submissions 279, 282, 283 and 289 ref. 116</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
Beaton Family	291	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 291 ref. 116</i>		<ul style="list-style-type: none"> <li>• Support more robust timeframe for carrying out work.</li> <li>• 10 hours arbitrary, should be about cumulative effects of the activity on the bed. 20 hours more appropriate.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 291 ref. 116</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
Graylands Farms Ltd	302	Amend	We oppose the change to (d) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	<ul style="list-style-type: none"> <li>• 100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 302 ref. 116</i>		<ul style="list-style-type: none"> <li>• No reasonable justification or scientific basis for dropping distance from 250m to 100m.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 302 ref. 116</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms originally submitted to retain provision for reasonable mixing (consistent with RMA and NPSFW).</li> <li>• Support submitter in part, in terms of intent of retaining the provision for reasonable mixing and mixing zones.</li> <li>• Neutral on the other specific aspects of the submission.</li> </ul>
The Director-General of Conservation	306	Amend	That 13.5.1.4 be amended as follows, or to like effect: The disturbance or reclamation of, or the deposition of any substance in, on or under, the bed of any lake or river, for the purpose of the reinstatement of any bank of a lake or river which	<ul style="list-style-type: none"> <li>• Significant aquatic values can be adversely affected by reclamation or deposition of materials into waterways.</li> <li>• The most significant habitats of acutely threatened indigenous freshwater fish should be protected. Sensitivity of such areas of habitat varies and so do</li> </ul>

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			has been eroded by a flood event is a permitted activity providing: (a)-(g) (h) Such activities do not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	activities that threaten them. <ul style="list-style-type: none"> <li>Including new Schedule of areas provides greater clarity.</li> <li>Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
ME Elston	1002	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</li> <li>Negative implications for stormwater control and maintenance works (clearance of storm debris).</li> <li>Approach does not acknowledge local environmental conditions.</li> <li>Contrary to the purpose of the RMA.</li> </ul>
Forest and Bird NZ	1007	Support submission 306 ref. 116		<ul style="list-style-type: none"> <li>Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>
DJ & KR Scott	1008	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
Craiglea Limited	1012	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>No evidence from environmental impacts from agricultural activities.</li> <li>Changes are vague, unclear and open-ended.</li> <li>Resource consent requirements adds unnecessary level of costs and bureaucracy to farming operation.</li> </ul>
Contact Energy Limited	1013	Oppose in part submission 306 ref. 116		<ul style="list-style-type: none"> <li>Submission reserves the ability to expand the area of "significant aquatic values" beyond the areas shown on maps.</li> <li>Submission is then ultra vires for failing to adequately specify the relief sought.</li> </ul>
Auripo Enterprises Ltd	1017	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Relief must be provided to mitigate and repair flood damage.</li> </ul>
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Would impact on farming operation.</li> <li>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>Costs of the proposed changes outweigh the benefits.</li> </ul>
JH William & KA McNally	1020	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
RJ McNally	1021			
Kim & Mary Heany	1024			
Dunedin City Council	1025	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Many small structures can be erected with minimal adverse environmental effect.</li> </ul>
TJ & NM Arthur	1026	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Hindrance to farming practices and threat to viability of farm.</li> <li>Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>Creeks are not in their original beds.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>Too stringent.</li> </ul>
Ida Valley Station / Ida Valley Irrigation Co	1033	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</li> <li>Would have a huge impact on farming operation.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</li> <li>• Costs of proposed changes outweigh any potential benefits.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 116		<ul style="list-style-type: none"> <li>• Without identified areas, scope of changes and consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> <li>• Removal of flood debris must take place.</li> </ul>
Federated Farmers of New	1057	Oppose		<ul style="list-style-type: none"> <li>• Inconsistency with RMA Part II in putting human use values above others.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Extends scope of plan change with considerable impacts on farming.</li> <li>• Inequitable and contrary to RMA, given lack of environment issues.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Supports notified rules for erection or placement of structures and alterations of the bed, providing that provision is made for a reasonable mixing zone.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>• Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>• Should be initiated by the Council.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>Hawkdun Idaburn Irrigation Company Limited</i>	1066	<i>Oppose submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Oppose new (h).</li> <li>• Oppose introduction of Schedule xx "Significant Aquatic Values" and its use in the rules that it is referred to. Zones 1 &amp; 2 cover significant area of Otago and would reduce the purpose of a permitted activity.</li> <li>• The Hawkdun Idaburn Irrigation Company Limits collect water from 60 intakes and often needs to take rapid action after flood events to maintain water flows for stock, domestic and irrigation purposes.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Oppose submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</li> <li>• Seeks that the submission be disallowed.</li> </ul>
<i>Snowline Ltd</i>	1076	<i>Oppose submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Seeks to prohibit what council deems to be a permitted activity on land DOC has not yet defined.</li> <li>• Notified rule already protects indigenous flora, fauna or its habitat.</li> <li>• Need for clarification of the word "structure" in glossary.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 116</i>		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>

### 118 Rule 13.5.1.8A - Disturbance livestock permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Neil Douglas Cruickshank	23	Amend	Prohibit stock from access to our waterways where it is feasible to do so.	<ul style="list-style-type: none"> <li>• Rights of others downstream to have good quality water, farming practices have to change.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 23 ref. 118</i>		<ul style="list-style-type: none"> <li>• Allows for permitted status.</li> <li>• Ensure disturbance limited to significant adverse effects.</li> <li>• In some situations its impossible to fence and either no alternatives or none that are cost effective.</li> </ul>
G & S Geddes	50	Oppose	Oppose 13.5.1.8A.	<ul style="list-style-type: none"> <li>• Does this mean no stock water?</li> <li>• Can animals cross irrigation races when water running?</li> </ul>
Green Party (Dunedin Branch)	62	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>• Hard to see how could livestock disturb waterways without damaging fauna and flora.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62</i>		<ul style="list-style-type: none"> <li>• Unnecessary and inappropriate.</li> <li>• High level of cost to farming with no clear benefit.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 118</i>		
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 62 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>No reason stated.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>			
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>Otago Water Resource Users Group</i>	<i>1056</i>	<i>Oppose submission 62 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>Unreasonable restriction on farm management.</i></li> </ul>
Peter Deans & Graham Deans	63	Amend	It is unpractical to fence off all waterways.	<ul style="list-style-type: none"> <li>• No water schemes in many rural areas.</li> <li>• Stock need access to water and must have access to shelter (Animal Welfare Act).</li> <li>• A lot of shelter is in bush clad gullies and depressions, near creek beds.</li> <li>• Rule has some positive points.</li> </ul>
Roger Fox	82	Support	Support.	<ul style="list-style-type: none"> <li>• Good.</li> </ul>
Alastair Rutherford	105	Support	Keep rule as proposed.	<ul style="list-style-type: none"> <li>• Only practical solution as many high country water courses can't be fenced and aren't affected by stock.</li> </ul>
Jane Young	124	Amend	Amend to: "... is a permitted activity, providing the land owner can demonstrate that it does not..."	<ul style="list-style-type: none"> <li>• Standards often qualitative not quantitative - hard to determine if rules breached.</li> <li>• Farmer should be one to show no environmental damage is being caused.</li> <li>• Permitting stock crossing of any wetland not appropriate.</li> </ul>
Cath Gilmour	128	Amend	Amend so that riparian strips are protected.	<ul style="list-style-type: none"> <li>• Concerned about lack of riparian protection offered.</li> <li>• Water quality poorer where agriculture more intense e.g. dairying areas.</li> <li>• ORC should control impact of these activities on region's environment.</li> </ul>
The Cow Farm Limited	133	Amend	Rule be clarified to have measurable targets.	<ul style="list-style-type: none"> <li>• Rule will not allow activities that create minor and temporary changes.</li> <li>• Higher threshold than some permitted activities (suction dredge mining, people and vehicles crossing waterways).</li> </ul>
<i>Otago Water Resource Users Group</i>	<i>1056</i>	<i>Support in part submission 133 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>Rule should allow activities that create minor and temporary changes.</i></li> </ul>
Dairy NZ Limited	146	Amend	Change this rule to remove the absolute references and replace them with independently verifiable standards such as a maximum	<ul style="list-style-type: none"> <li>• Literally no reduction in visual clarity allowed.</li> <li>• Any disturbance would not be permitted.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			turbidity change.	<ul style="list-style-type: none"> <li>• Provide certainty that rule does not apply unless significant adverse effects.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 118</i>		<ul style="list-style-type: none"> <li>• Ensure disturbance limited to significant adverse effects.</li> <li>• Recognise situations occur outside planned farming activities.</li> <li>• In some situations its impossible to fence and either no alternatives or none that are cost effective.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 118</i>		<ul style="list-style-type: none"> <li>• Provision should be made in transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge limits.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 118</i>		<ul style="list-style-type: none"> <li>• Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</li> </ul>
Matuanui Ltd	163	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Waterways lifeblood of farm which we respect and want to keep for future generations.</li> <li>• Owaka doesn't have a reticulated water scheme as naturally available in streams and creeks.</li> <li>• Crossings constructed and maintained for generations to aid this.</li> </ul>
Sydney Mann	169	Did not specify	When stock wanders into rivers - Council will prosecute.	<ul style="list-style-type: none"> <li>• Recommended by experts.</li> </ul>
J N & J M Lawson Family Trust	171	Amend	There should be no compulsion to fence both sides of rivers or waterways where extensive grazing occurs - e.g. hill country - in the future.	<ul style="list-style-type: none"> <li>• Fence repair after flooding.</li> <li>• Weed control (e.g. gorse, broom) where it takes over fenced off edges of waterways.</li> <li>• Gorse leaches more nitrate into water than extravagant fertiliser use.</li> </ul>
Peter McNab	192	Amend	No decision requested.	<ul style="list-style-type: none"> <li>• Critical to extensive grazing in Otago.</li> <li>• In many situations not viable to reticulate stock water or fence springs and gullies.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	Retain rule 13.5.1.8A as currently drafted.	<ul style="list-style-type: none"> <li>• Supports intent of rule.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 118</i>		<ul style="list-style-type: none"> <li>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
Trustpower Limited	206	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> <li>• Support ensuring bed disturbance by stock has no significant adverse effect.</li> <li>• Support making bed crossings more permissive.</li> </ul>
Kawarau Station Limited	232	Amend	Amend to take out reference to visual clarity or further define.	<ul style="list-style-type: none"> <li>• No increase in visual clarity unattainable.</li> <li>• Effect of livestock needs to be significant and more than minor.</li> </ul>
Forest Range Ltd	240	Oppose	These rules need deletion or considerable amendment to provide common sense and flexible solutions that will allow livestock enterprises on high country properties to continue farming in a sustainable manner.	<ul style="list-style-type: none"> <li>• Impact farmers on extensive properties.</li> <li>• Stock could cross river in paddock frequently.</li> <li>• Fencing not possible or affordable.</li> <li>• Grazing short period but may affect water quality outside of conditions.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 240 ref. 118</i>		<ul style="list-style-type: none"> <li>• Rule uncertain. Issue of viability where existing practices have no effects or alternatives.</li> <li>• Alternative to crossings may be unfeasible and not cost effective.</li> </ul>
Fonterra Co-operative Group Limited	241	Amend	Change this rule to remove the absolute references and replace them with independently verifiable standards such as a maximum turbidity change.	<ul style="list-style-type: none"> <li>• Literally no reduction in visual clarity allowed.</li> <li>• Any disturbance would not be permitted.</li> <li>• Provide certainty that rule does not apply unless significant adverse effects.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 118</i>		<ul style="list-style-type: none"> <li>• Livestock disturbance must be managed.</li> <li>• Impacts on sedimentation and water quality contribute to degradation of water.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 241 ref. 118</i>		<ul style="list-style-type: none"> <li>• Difficult to measure.</li> <li>• Changes may be temporary but their effects prolonged and severe.</li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• Livestock disturbance must be managed to avoid adverse effects on rivers.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 241 ref. 118</i>		<i>lakes and wetlands, and their ecosystems.</i> • <i>Their impact on sedimentation and water quality contribute to degradation of water.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 241 ref. 118</i>		• <i>Ensures rule/disturbance limited to significant adverse effects.</i>
Queenstown Lakes District Council	255	Amend	Amend Rule to provide greater direction with regard to the use of appropriate control methods to avoid livestock disturbance of the beds of water bodies.	• Riparian strips would be vulnerable. • Need to be more proactive.
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 255 ref. 118</i>		• <i>No reasons given.</i>
<i>Clutha District Council</i>	<i>1050</i>	<i>Support in part submission 255 ref. 118</i>		• <i>Further clarity is needed.</i> • <i>PC6A should be withdrawn if concerns are not addressed.</i> • <i>Too complex for landowners.</i>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 255 ref. 118</i>		• <i>Recognition Schedules 15 and 16 don't accurately reflect variations between water bodies.</i> • <i>Agreed that allowance for appropriate mixing zones should be included.</i> • <i>Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</i> • <i>Seeks the submission be allowed and the plan change be amended as per the submission.</i>
Colin Scurr	268	Amend	Rule be amended to reinstate qualifiers and provision for disturbances in emergencies or exceptional circumstances.	• Removes qualifier for conspicuous disturbance. This reduces the threshold. • Does not provide for emergency disturbances or disturbances in exceptional circumstances.
Marc Schallenberg	270	Amend	The proposed plan change should be amended to include a goal of excluding farm stock from the beds of rivers, lakes and wetlands by 2017. Farm stock should be prohibited from disturbing these beds at all times (for any purpose). However, where absolutely necessary, rare occurrences of bed disturbance could be permitted for the purpose of stock movement (e.g. Seasonal muster). Permits should be sought from the ORC for any such disturbance of the beds.	• Exclusion of stock from waterways key to safeguarding water quality, ecological and recreational values. • Need for alignment with goals of Clean Streams Accord and environmental goals of many regional councils. • Need to fence off buffer zone of 10 m from river banks and buffer zone of 20 m from lake shores.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Oppose submission 270 ref. 118</i>		• <i>Suggested timeframes and fencing requirements unachievable.</i>
<i>Fonterra Co-operative Group Limited</i>	<i>1068</i>	<i>Oppose in part submission 270 ref. 118</i>		• <i>Oppose in relation to the excessive buffer zones requiring fencing that are proposed.</i>
Forest and Bird	271	Amend	Amend to read: "The disturbance of the bed or margin of any lake or river, or any wetland by livestock is a permitted activity, providing it maintains the characteristics of good water quality in Schedule 15 and does not: (a) Cause or induce slumping, pugging or erosion; or (b) Expose soil; or (c) Involve feeding out; or (d) Involve grazing of dairy cows, including dairy runoff, farmed deer, farmed pigs; or (e) Involve livestock* contained for break-feeding or grazed on	• Rule as proposed has the potential to adversely affect the ecological functioning and values of water bodies. • Stock in riparian areas has adverse impact on water quality. • Inadequate fencing under the clean streams accord. • Rule as proposed very difficult to enforce and monitor. • Similar permitted activity status has not worked. • Simplest, most enforceable and most certain method is fencing dairy stock, cattle, farmed pigs, deer out of streams and RSWs. • Note rule does not cover margins of lakes, rivers, streams, or wetlands. It should if not covered elsewhere.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			irrigated land, adjacent to a river, lake or wetland; or [* including cattle, sheep, deer, horses, pigs, goats, lama, alpacas] (d) Increase the colour or reduce the visual clarity of water; or (f) Damage indigenous fauna, or indigenous flora, in or on the bed or margin of any lake or river, or wetland; or (g) Occur in or on any Regionally Significant Wetland, or its margin, or occur in areas that meet criteria for regionally significant wetland in Schedule XXXX.  Activities which breach rule 13.5.1.8A are a prohibited activity.	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Background data required before any agricultural activities are restricted.</i></li> <li>• <i>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</i></li> <li>• <i>Background data required before any steps are taken to restrict agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>Goes beyond rule/Plan Change 2, virtually impossible to comply with.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose in part submission 271 ref. 118</i>		<ul style="list-style-type: none"> <li>• <i>Proposed amendments are not effects based – there is no reason provided for including only these classes of stock, and the adverse effects to be managed are adequately dealt with in the existing rule.</i></li> </ul>
ALT Holdings Ltd	274	Oppose	ORC to consult with farming groups to ensure any new rules are workable for the farmer, and that not only the environmental impact but also the social economical and cultural impacts have been considered.	<ul style="list-style-type: none"> <li>• Oppose rule as not workable or practical.</li> <li>• Fencing comes at huge cost.</li> <li>• No evidence provided that changes will protect or improve water quality from current.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			I would like to see evidence that suggests our current farming (non-intensive) practices are having a negative impact on water quality.  I would like the authority to tell me in detail what evidence they have that will show that the suggested changes will in fact increase or protect our water quality more so than our current farming methods.	
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 274 ref. 118</i>		<ul style="list-style-type: none"> <li>• Rules must be practical and have scientific basis.</li> <li>• Prohibited status not justified.</li> </ul>
T M and C M Scurr	275	Oppose	Opposes rule.	<ul style="list-style-type: none"> <li>• Stock movements in high country in their grazing habits and in season's movements are essential.</li> <li>• Have strong hard ground and no problems with mud.</li> <li>• Not practicable to fence waterways and build thousands of crossings.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 275 ref. 118</i>		<ul style="list-style-type: none"> <li>• Ensure disturbance limited to significant adverse effects.</li> <li>• Recognise situations occur outside planned farming activities.</li> <li>• In some situations its impossible to fence and either no alternatives or none that are cost effective.</li> </ul>
Federated Farmers of New Zealand	278	Amend	Adopt rule with amendments: "The disturbance of the bed of any lake... (d) increase the colour or reduce the visual clarity after 100m."	<ul style="list-style-type: none"> <li>• Supports providing for stock access to water as a permitted activity.</li> <li>• Need to recognise that some situations are impossible to fence, and impractical to install crossings or stock water schemes.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 118</i>		<ul style="list-style-type: none"> <li>• Practical and workable alternatives, solutions and suggestions.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 118</i>		<ul style="list-style-type: none"> <li>• Rule does not adequately protect water quality.</li> <li>• Adding a 100m mixing zone exacerbates the problems.</li> </ul>
<i>Hopfield Investments Ltd</i>	1019	<i>Support submission 278 ref. 118</i>		<ul style="list-style-type: none"> <li>• Operation relies on natural streams for continuing viability.</li> <li>• Plan change has huge impact on farming business.</li> <li>• Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 118</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 118</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
Beaton Family	291	Did not specify	Rule 13.5.1.8A (b) seems very prohibiting.	<ul style="list-style-type: none"> <li>• Difficult for livestock not to expose soil.</li> </ul>
Deer Industry New Zealand	293	Amend	No decision requested.	<ul style="list-style-type: none"> <li>• Practicalities of fencing (\$12-14 per metre minimum).</li> <li>• Times when compliance severely tested.</li> <li>• Acknowledges rule as a strong principle, but compliance in extensive deer farming in the hill and high country will be challenging at some periods in the seasonal calendar.</li> </ul>
Graylands Farms Ltd	302	Support	Support.	<ul style="list-style-type: none"> <li>• We wish to continue farming.</li> </ul>
The Director-General of Conservation	306	Amend	That 13.5.1.8A be amended as follows, or to like effect: The disturbance of the bed of any lake or river, or any Regionally Significant Wetland, by livestock, other than dairy cows, is a permitted activity, providing it does not: (a) Cause or induce slumping, pugging or erosion; or	<ul style="list-style-type: none"> <li>• Significant aquatic values can be adversely affected by bed disturbance.</li> <li>• RMA uses the terms "Indigenous" not "New Zealand"</li> <li>• Fonterra have committed to excluding dairy cattle from all "Accord" waterways by 2014.</li> <li>• Significant habitats are located in smaller waterways and lakes. New rule</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			(b) Expose soil; or (c) Involve feeding out or planting of crops; or (d) Increase the colour or reduce the visual clarity of water; or (e) Occur in areas identified in Schedule xx - Areas of Significant Aquatic Values in Zone 1 [see submission point 228]; or (f) Damage habitats of indigenous fauna, or damage indigenous flora, in or the bed of any lake or river, or on any Regionally Significant Wetland.  Activities which breach rule are a discretionary activity.	required to recognise this and meet turbidity standards. <ul style="list-style-type: none"> <li>The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>Including new Schedule of areas provides greater clarity.</li> <li>Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</li> <li>Prevents normal and safe access to properties.</li> <li>Approach does not acknowledge local environmental conditions.</li> <li>Contrary to the purpose of the RMA.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>
<i>DJ &amp; KR Scott</i>	1008	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>No evidence from environmental impacts from agricultural activities.</li> <li>Changes are vague, unclear and open-ended.</li> <li>Restrictions are inappropriate and have adverse effects on farming operations.</li> </ul>
<i>Auripo Enterprises Ltd</i>	1017	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Not practical to exclude livestock from these areas.</li> <li>Cost and administration of resource consents process unnecessary to achieve purpose of the RPW.</li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Would impact on farming operation.</li> <li>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>Costs of the proposed changes outweigh the benefits.</li> <li>Livestock access to natural waterways is a vital part of our management policy.</li> </ul>
<i>JH William &amp; KA McNally</i>	1020	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
<i>RJ McNally</i>	1021			
<i>Kim &amp; Mary Heany</i>	1024			
<i>TJ &amp; NM Arthur</i>	1026	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Hindrance to farming practices and threat to viability of farm.</li> <li>Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>Creeks are not in their original beds.</li> <li>Stock lightly grazing the waterways protects fish habitat and water quality.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>Too stringent.</li> </ul>
<i>Ida Valley Station / Ida Valley Irrigation Co</i>	1033	<i>Oppose submission 306 ref. 118</i>		<ul style="list-style-type: none"> <li>The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</li> <li>Would have a huge impact on farming operation.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</li> <li>• Costs of proposed changes outweigh any potential benefits.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>• Without identified areas, scope of changes and consequential effects cannot be identified.</li> <li>• Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater.</li> <li>• Values are present with the current stock management system.</li> <li>• Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive.</li> </ul>
				<ul style="list-style-type: none"> <li>• Precluding dairy cows from the permitted activity is contrary to the effects-</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>based intent and is targeting land use.</li> <li>Removal of flood debris must take place.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>Significant work involved in addressing dairy cows, additional requirement not necessary.</li> <li>Rule addresses waterway values already.</li> </ul>
TrustPower	1059	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>Should be initiated by the Council.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>Impractical for large sheep, deer or cattle properties. These properties have grazed livestock for decades and if significant aquatic values are there presently there appears to be no reason to implement a bureaucratic process of applying for consent or requiring the areas to be fenced off from stock.</li> </ul>
Fonterra Co-operative Group Limited	1068	Oppose in part submission 306 ref. 118		<ul style="list-style-type: none"> <li>Oppose specific capture of dairy cows as a stock class only. This is not effects based.</li> <li>Support limiting point (f) to indigenous species only.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 118		<ul style="list-style-type: none"> <li>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>Rules fail relevant tests under section 32 RMA.</li> <li>Additional controls not justified in terms of effects.</li> <li>Seek the submission be disallowed.</li> </ul>
Glen Dene Limited	310	Amend	Rule be amended to incorporate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> <li>Removing qualifier for conspicuous disturbance reduces applicability.</li> <li>Does not provide for emergencies or exceptional circumstances.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
Federated Farmers of New Zealand	1057	Support submissions 310 - 326 ref. 118		<ul style="list-style-type: none"> <li>Ensure disturbance limited to significant adverse effects.</li> <li>Recognise situations occur outside planned farming activities.</li> <li>In some situations its impossible to fence and either no alternatives or none that are cost effective.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 118</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

### 119 Rule 13.5.1.8B - Disturbance seasonal muster permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Neil Douglas Cruickshank	23	Amend	Only permit passage of stock through waterways where it is feasible way of stock.	<ul style="list-style-type: none"> <li>• Rights of others downstream to have good quality water, farming practices have to change.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 23 ref. 119</i>		<ul style="list-style-type: none"> <li>• <i>Appropriate to allow for seasonal muster, preventing it would prevent normal farming activity.</i></li> <li>• <i>Often no feasible or cost effective alternatives to crossings.</i></li> </ul>
Green Party (Dunedin Branch)	62	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>• Hard to see how could livestock disturb waterways without damaging fauna and flora.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 119</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessary and inappropriate.</i></li> <li>• <i>High level of cost to farming with no clear benefit.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 62 ref. 119</i>		<ul style="list-style-type: none"> <li>• <i>No reason stated.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 62 ref. 119</i>		<ul style="list-style-type: none"> <li>• <i>Unreasonable restriction on farm management.</i></li> </ul>
Jane Young	124	Amend	Delete 'or Regionally Significant Wetland' as a permitted activity for seasonal muster.	<ul style="list-style-type: none"> <li>• Permitting stock crossing of any wetland not appropriate.</li> </ul>
Cath Gilmour	128	Amend	Amend so that riparian strips are protected.	<ul style="list-style-type: none"> <li>• Concerned about lack of riparian protection offered.</li> <li>• Water quality poorer where agriculture more intense e.g. dairying areas.</li> <li>• ORC should control impact of these activities on region's environment.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
The Cow Farm Limited	133	Oppose	Delete rule.	• Activity already provided for by 13.5.1.8A.
Dairy NZ Limited	146	Oppose	Delete this rule.	• Provided for in Rule 13.5.1.8A.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 119</i>		• <i>Provision should be made in transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge limits.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 119</i>		• <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	Retain rule 13.5.1.8B as currently drafted.	• Supports intent of rule.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 119</i>		• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
Trustpower Limited	206	Support	Adopt the proposed rule.	• Support ensuring bed disturbance by stock has no significant adverse effect. • Support making bed crossings more permissive.
Kawarau Station Limited	232	Amend	Amend to include additional stock movement activity.	• Need additional ability to move stock outside seasonal muster e.g. for grazing.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 232 ref. 119</i>		• <i>Need to allow for (e.g. animal health issues).</i>
Forest Range Ltd	240	Oppose	These rules need deletion or considerable amendment to provide common sense and flexible solutions that will allow livestock enterprises on high country properties to continue farming in a sustainable manner.	• Impact farmers on extensive properties. • Stock could cross river in paddock frequently. • Fencing not possible or affordable.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 240 ref. 119</i>		• <i>Rule uncertain. Issue of viability where existing practices have no effects or alternatives.</i> • <i>Alternative to crossings may be unfeasible and not cost effective.</i>
Fonterra Co-operative Group Limited	241	Oppose	Delete this rule.	• Provided for in Rule 13.5.1.8A.
B Landreth Ltd	253	Amend	Clarify what 'season muster' means e.g. Quarterly.	• Currently mitigate through use of crossings where possible but difficult to fence due to flooding.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 253 ref. 119</i>		• <i>Open to abuse without definition.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 253 ref. 119</i>		• <i>Will remove uncertainty.</i>
Queenstown Lakes District Council	255	Amend	Amend Rule to provide greater direction with regard to the use of appropriate control methods to avoid livestock disturbance of the beds of water bodies.	• Riparian strips would be vulnerable. • Need to be more proactive.
<i>Dunedin City Council</i>	1025	<i>Support submission 255 ref. 119</i>		• <i>No reasons given.</i>
<i>Clutha District Council</i>	1050	<i>Support in part submission 255 ref. 119</i>		• <i>Further clarity is needed.</i> • <i>PC6A should be withdrawn if concerns are not addressed.</i> • <i>Too complex for landowners.</i>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>The NZ Transport Agency</i>	1073	<i>Support submission 255 ref. 119</i>		• <i>Recognition Schedules 15 and 16 don't accurately reflect variations between water bodies.</i> • <i>Agreed that allowance for appropriate mixing zones should be included.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</li> <li>Seeks the submission be allowed and the plan change be amended as per the submission.</li> </ul>
Colin Scurr	268	Amend	Rule be amended to include qualifiers such as conspicuous, and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> <li>Term 'seasonal muster' is ambiguous.</li> <li>Rule does not include qualifiers, which is inconsistent with the RMA and narrows the applicability of the rule.</li> <li>No environmental basis for removal of qualifiers.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 268 ref. 119		<ul style="list-style-type: none"> <li>Will remove uncertainty.</li> <li>Ensure disturbance limited to significant adverse effects.</li> <li>Recognise situations occur outside planned farming activities.</li> <li>In some situations its impossible to fence and either no alternatives or none that are cost effective.</li> </ul>
Federated Farmers of New Zealand	278	Amend	Adopt rule as proposed with amendments: "The disturbance of the bed of any lake or river, or Regionally Significant Wetland, by livestock due to muster, is a permitted activity..."	<ul style="list-style-type: none"> <li>Need to allow for mustering and extra-ordinary farming activities e.g. animal health issues.</li> <li>Difficult to define 'seasonal muster' and more appropriate to provide for occasional movement of stock across water for the purposes of mustering (as opposed to regular crossing).</li> </ul>
Albert McTainsh	1004	Support submission 278 ref. 119		<ul style="list-style-type: none"> <li>Practical and workable alternatives, solutions and suggestions.</li> </ul>
Hopfield Investments Ltd	1019	Support submission 278 ref. 119		<ul style="list-style-type: none"> <li>Operation relies on natural streams for continuing viability.</li> <li>Plan change has huge impact on farming business.</li> <li>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
Strath Taieri Community Board	1029	Support submission 278 ref. 119		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Otago Water Resource Users Group	1056	Support in part submission 278 ref. 119		<ul style="list-style-type: none"> <li>Musters requires for more than seasonal movement of stock.</li> <li>In such cases, crossing structure not practical or would require impractical fencing.</li> </ul>
Glenshee Station Limited	1062	Support in part submission 278 ref. 119		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
Deer Industry New Zealand	293	Amend	Better definition of seasonal muster required.	<ul style="list-style-type: none"> <li>Deer often moved to accommodate breeding season requirements, management reasons, or in response to adverse events without seasonal qualifier.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 293 ref. 119		<ul style="list-style-type: none"> <li>Will remove uncertainty.</li> </ul>
Graylands Farms Ltd	302	Support	Support.	<ul style="list-style-type: none"> <li>We wish to continue farming.</li> </ul>
The Director-General of Conservation	306	Amend	The giving of full effect to the following new definition, or to like effect: Seasonal muster - The seasonal shifting of stock, being 1 shift per season.	<ul style="list-style-type: none"> <li>Seasonal muster should be defined so all plan users can be aware of their rights and responsibilities.</li> </ul>
Forest and Bird NZ	1007	Support submission 306 ref. 119		<ul style="list-style-type: none"> <li>"Seasonal" needs defining to add certainty for land managers.</li> </ul>
Craiglea Limited	1012	Oppose		<ul style="list-style-type: none"> <li>No evidence from environmental impacts from agricultural activities.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		submission 306 ref. 119		<ul style="list-style-type: none"> <li>• Changes are vague, unclear and open-ended.</li> <li>• Restrictions are inappropriate and have adverse effects on farming operations.</li> </ul>
Hopfield Investments Ltd	1019	Oppose submission 306 ref. 119		<ul style="list-style-type: none"> <li>• Would impact on farming operation.</li> <li>• Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>• Costs of the proposed changes outweigh the benefits.</li> <li>• Livestock access to natural waterways is a vital part of our management policy.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 119		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 119		<ul style="list-style-type: none"> <li>• Restrictions on seasonal musters are inappropriate and have adverse effects on the farming activities.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
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Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 119		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 119		<ul style="list-style-type: none"> <li>• Restrictions on seasonal musters are inappropriate and have adverse effects on the farming activities.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 119		<ul style="list-style-type: none"> <li>• Musters are required for more than seasonal movement of stock.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose in part submission 306 ref. 119</i>		<ul style="list-style-type: none"> <li>• Requires definition but that proposed is restrictive and unworkable.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 119</i>		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 119</i>		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>
Glen Dene Limited	310	Amend	Rule be amended to include qualifiers such as conspicuous.	<ul style="list-style-type: none"> <li>• Ambiguity around 'seasonal muster'.</li> <li>• Inconsistent with the Act.</li> <li>• Lack of qualifiers narrows applicability.</li> </ul>
Ben Graham	311	Amend	Rule be amended to include qualifiers such as conspicuous, and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. drenching) rather than daily events (such as milking).	
Wyllies Crossing Limited	312	Amend		
Calder Stewart Industries Limited	313	Amend		
Greer Farms Partnerships	314		<p>Rule be amended to include qualifiers such as conspicuous and the concept of seasonal muster needs to be clarified.</p> <p>Rule should also provide for sheep to pass through a waterway for the purpose of moving them between locations as they do not cause sufficient adverse environmental effects to warrant inclusion with Rule 13.5.A.0 below.</p>	
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315		Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
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Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 - 326 ref. 119</i>		<ul style="list-style-type: none"> <li>• Clarity in definitions removes uncertainty.</li> <li>• Lack of qualifiers narrows rule applicability.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 119</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

### 120 Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Neil Douglas Cruickshank	23	Amend	Only permit passage of stock through waterways where it is the only feasible way of moving stock.	<ul style="list-style-type: none"> <li>• Rights of others downstream to have good quality water, farming practices have to change.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 23 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Would have considerable repercussion on farming, impractical.</i></li> </ul>
Shag Valley Station	36	Amend	Make this an activity that was permitted or that resource consent could be sought to allow occasional movement of stock through this waterway [Shag River].	<ul style="list-style-type: none"> <li>• Use of 3 historic crossings on a seasonal basis would impact farming operation.</li> <li>• Shag River prone to major flood events - cost of building bridge is prohibitive.</li> <li>• Animal welfare (e.g. sheep need to get back to the woolshed because of a fly strike outbreak).</li> <li>• Crossings used are gravel based and firm (no erosion or pugging caused).</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 36 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Agree with permitted activity status for occasional stock crossings across/through river.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 36 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Essential to farming operations, alternatives not practical or cost effective.</i></li> </ul>
Glenorchy Branch of Lakes Landcare	40	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>• Number of things of concern.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 40 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Would have considerable repercussion on farming, impractical.</i></li> </ul>
Rees Valley Station Limited	41	Oppose	Delete 13.5A.	<ul style="list-style-type: none"> <li>• Looked at problems case by case.</li> <li>• Allow flexibility.</li> <li>• Rees Valley Station has a lot of waterways with which stock interact in various ways.</li> <li>• Rule inappropriate for our farm.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 41 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Rule as written by ORC is unworkable.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 41 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Rule must be more workable. Considering on case by case basis appropriate where criteria can't be met.</i></li> </ul>
G R Crutchley	42	Amend	That a further exclusion clause be included in this rule to read; "Excluding established land use where this does not result in any detectable adverse effects on water quality or existing wetland".	<ul style="list-style-type: none"> <li>• Boundary of Upper Taieri Wetland includes areas of freehold land which is sustainably used for grazing stock.</li> <li>• Farmers assured land use could continue.</li> <li>• Without exclusion clause, rule will adversely affect viability of properties with no beneficial effects on water quality or wetland values.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 42 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Proposed exclusion clause protects viability where existing practices have no effects or alternatives.</i></li> </ul>
Hopefield Investments Ltd (C Cochrane)	45	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame imposed.	<ul style="list-style-type: none"> <li>• Proposed time frame places inequitable financial burden on pastoral farmers.</li> <li>• Will devalue ORC's primary sector rating base.</li> <li>• Inhibit development and enhancement of resources unless financial assistance granted to landholders.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 45 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Concerns with workability.</i></li> <li>• <i>Despite precautions may still breach rules, making scheme unworkable with financial costs.</i></li> </ul>
G & S Geddes	50	Oppose	Oppose 13.5A.0.1.	<ul style="list-style-type: none"> <li>• Does this mean no stock water?</li> <li>• Can animals cross irrigation races when water running?</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 50 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Proposed exclusion clause protects viability where existing practices have no effects or alternatives.</i></li> </ul>
C P Mulholland	58	Oppose	Culverts put in where necessary, but not practical to fence every waterway.	<ul style="list-style-type: none"> <li>• Cannot control stock at all times.</li> <li>• Hill country extensive and difficult to access.</li> <li>• No control of poachers.</li> </ul>
Glenayr Ltd (D & D Sangster)	59	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Not practical to fence every waterway.</li> <li>• Farm has numerous drains, ditches.</li> <li>• Have fenced Taieri River, but not practical to fence every hollow, drain, lagoon, ditch on a floodplain.</li> <li>• Fencing has tradeoff with weed growth and water being held back.</li> <li>• Have provided culverts and crossings but cannot guarantee stock use them.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 59 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Consider damage from weed growth and water flow issues.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
S H Andrews and Sons Ltd	61	Amend	That in our situation a maximum of six cattle crossings per year be permitted.	<ul style="list-style-type: none"> <li>• Move cattle through Taieri six times a year, mob in river about 2 minutes.</li> <li>• Damage less than minor</li> <li>• Alternative two hour droving on 7 km of public roads.</li> </ul>
Green Party (Dunedin Branch)	62	Support	Strongly support these [prohibited activities].	<ul style="list-style-type: none"> <li>• Prohibiting direct stock access causing damage.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessary and inappropriate.</i></li> <li>• <i>High level of cost to farming with no clear benefit.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 62 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>No reason stated.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Loganbrae Ltd	75	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Not practical to fence every waterway.</li> <li>• Farm has numerous drains, ditches.</li> <li>• Have fenced Taieri River, but not practical to fence every hollow, drain, lagoon, ditch on a floodplain.</li> <li>• Fencing has tradeoff with weed growth and water being held back.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 75 ref. 120</i>		<ul style="list-style-type: none"> <li>• Have provided culverts and crossings but cannot guarantee stock use them.</li> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Glen Ayr Ltd (D & C Dundass)	76	Amend	Need clarification on what constitutes intensive stock activity close to water e.g. stocking rate.	<ul style="list-style-type: none"> <li>• Our property is included in the significant wetland and bounds Taieri River, concerned about implications for significant wetlands.</li> <li>• Not practical to fence every waterway.</li> <li>• Have positioned many crossings but can't guarantee cattle will use them.</li> <li>• Have our stock crossings on high ground / natural stock routes to eliminate scouring.</li> <li>• Only graze in summer when it is dry - any flooding and all stock removed.</li> <li>• Agree there has to be a balance between water quality and farming close to water and waterways but needs clarification.</li> <li>• Currently fence of river with an electric wire but not practical to fence off every lagoon, ditch or hollow as these flats fill and dry continually.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 76 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Cross Family Trusts	77	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame imposed.	<ul style="list-style-type: none"> <li>• Proposed timeframe for change places inequitable financial burden upon pastoral farmers.</li> <li>• Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources.</li> </ul>
Roger Fox	82	Support	Support.	• Good.
Alan L Wilson	88	Amend	Would like to see it amended in some way.	• Small farm waterways, has constructed expensive stock water ponds in paddocks, almost impossible to comply with Rule 13.5A.0.1.
Kintyre Farms 2008 Ltd	90	Amend	That it reads "Long term grazing use and established farming practice should not be prohibited where this practice has not affected water quality in the river and the adjacent oxbows and back-washes."	<ul style="list-style-type: none"> <li>• Farming Maniototo land adjacent to river for decades, use it for grazing in dry summer.</li> <li>• ORC-subsidised willow clearing and channel straightening in early 1980s benefited owners, enhanced productive value and use of low lying land adjacent to river.</li> <li>• Agricultural production will be lost, economic viability compromised.</li> <li>• Fencing river margin and monitoring adjacent grazing negates water quality concerns.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 90 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> </ul>
Paul Corboy	94	Amend	Permit the use of suitable hard-bottomed fords for stock crossings of waterways on a casual basis.	<ul style="list-style-type: none"> <li>• Can use hard-bottomed (rock or gravel) crossings with little effect on banks and bed.</li> <li>• Not for daily use, but as part of grazing rotation (every 2-4 weeks).</li> <li>• Cost of a bridge or culvert to enable crossing to a small land area could make its grazing uneconomic, with little environmental benefit.</li> </ul>
Duncan Henderson	100	Amend	OK for intensive farming.	• Concerned this rule should apply only to intensive practice, but in future will be enforced to cover all livestock properties.
Ross A & Alexa Wallace	101	Oppose	13.5.A.0 Remove.	• Unnecessary and confusing as already covered by clause 13.5.1.8A.
Glenshee Station Ltd (P Hore)	102	Amend	13.5A.0.1 Should become a permitted activity providing it does not cause or induce slumping, pugging or erosion.	<ul style="list-style-type: none"> <li>• Otherwise impractical, would impact adversely on many day to day farming operations.</li> <li>• Not helpful in maintaining good water quality in extensive farming areas e.g. weed control.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 102 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alastair Rutherford	105	Support	Keep rule as proposed.	<ul style="list-style-type: none"> <li>Practical solution.</li> </ul>
Michael Rawlinson	121	Amend	Maintain and strengthen to prohibit all unnecessary livestock access to the bed of any lake, river or wetland.	<ul style="list-style-type: none"> <li>Livestock should be kept out of riparian strips and the bed of lakes, rivers and wetlands at all times.</li> </ul>
Albert McTainsh	122	Amend	That Rule 13.5A.0 is not considered a prohibited activity, instead being a lesser activity status, restricted discretionary.	<ul style="list-style-type: none"> <li>Concerned rule will be extended to cover all stock access to creeks</li> <li>Impractical and financially unfeasible to fence off creeks, susceptible to heavy rainfall and swelling.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 122 ref. 120</i>		<ul style="list-style-type: none"> <li><i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li><i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Mt Aspiring Station	127	Amend	Add new (c) stating "Excluding when there are no practical, realistic & cost-effective alternatives that will allow the land manager to carry out their normal farming activities".	<ul style="list-style-type: none"> <li>Impractical and costly to establish and maintain bridges due to landscape.</li> <li>QLDC classified main public road impractical and uneconomic to bridge.</li> <li>Wanaka Lakes reported to have very good water quality despite 120 years of farming</li> <li>No scientific evidence of cumulative effects of stock crossing on water quality in the Matukituki or the results that banning this will have.</li> <li>Can maintain and improve water quality without banning stock crossings and associated expenditure.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 127 ref. 120</i>		<ul style="list-style-type: none"> <li><i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li><i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Grant Bradfield	131	Amend	Clarification is needed as to what is the definition of a river.	<ul style="list-style-type: none"> <li>Small, flood-prone waterways may not be suitable for bridges or culverts.</li> </ul>
The Cow Farm Limited	133	Amend	Amend rule to provide measurable parameters.  Clarify the rule in relation to ephemeral beds of rivers.  Clarify what a seasonal muster is and when it can occur.	<ul style="list-style-type: none"> <li>Prohibited activity status too restrictive, does not allow assessment on a case-by-case basis, or for emergency situations.</li> <li>Not clear what effect is mitigated by this rule</li> <li>Exclusion of seasonal mustering allows interpretation.</li> <li>No differentiation between livestock type, numbers or size of water and captures ephemeral water bodies which is nonsensical.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 120</i>		<ul style="list-style-type: none"> <li><i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li><i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
M B & J A Mitchell	134	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>How much water makes a river? What is a stream? Can stock cross naturally to eat?</li> <li>Many areas have natural streams where stock and wildlife cross.</li> <li>Streams a natural water supply for stock.</li> </ul>
P J & A M Neame Ltd	137	Amend	This rule should be changed to, "If the crossing or passing complies with the Clean Streams Accord, it shall be deemed an acceptable activity".	<ul style="list-style-type: none"> <li>Every case is different; impractical to treat every lake, stream and river crossing in the same manner.</li> </ul>
Dairy NZ Limited	146	Amend	Change this rule to specify independently verifiable standards such as a maximum turbidity change. Change the reference to "seasonal muster" and replace with more specific quantifiable limits that would ensure the attainment of a numerical water quality objective.	<ul style="list-style-type: none"> <li>Absolute prohibition is not justified based on environmental outcomes.</li> <li>Potentially unnecessary expenditure to land owners.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 146 ref. 120</i>		<ul style="list-style-type: none"> <li><i>Difficult to measure.</i></li> <li><i>Changes may be temporary but their effects prolonged and severe.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 120</i>		<ul style="list-style-type: none"> <li><i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li><i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 120</i>		<ul style="list-style-type: none"> <li><i>Provision should be made in transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge limits.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i></li> </ul>
Run 248m Ltd	153	Oppose	This rule should be deleted particularly for pastoral farming.	<ul style="list-style-type: none"> <li>• Impossible for large pastoral farming operations to continue.</li> <li>• Vast areas with numerous streams impossible to fence.</li> <li>• Fencing causes more soil disturbance than it reduces, and changes landscape.</li> <li>• Stock cross for health checks, drenching, shearing.</li> </ul>
Sam Kane	161	Oppose	Crossing stock across rivers/lakes must be a permitted activity. Exist elsewhere in the plan proviso's to ensure that this activity does not have substantial negative impacts on the environment.	<ul style="list-style-type: none"> <li>• Incorrect to assume that crossing stock causes damage.</li> </ul>
Matuanui Ltd	163	Amend	Amend rule to allow for situations where it is not feasible to put in a stock crossing and stock movement is needed outside of seasonal muster.	<ul style="list-style-type: none"> <li>• Fencing necessary in some situations, but can be impractical e.g. paddock has stream and three tributaries, impractical to alter winter stock rotation or removing natural stock drinking water.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 163 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Hunter Valley Station Ltd	166	Amend	Re-evaluate decisions on high rainfall properties and the influence this has on them.	<ul style="list-style-type: none"> <li>• Many examples of river deltas and associated problems caused by natural phenomena, that cannot be attributed to offenses associated with farming.</li> </ul>
James Watt	167	Oppose	Remove.	<ul style="list-style-type: none"> <li>• Unnecessary.</li> <li>• Contradicts Rule 13.5.1.8A.</li> </ul>
Peter McNab	192	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>• Does this mean animals can't be gathered and crossed over creeks?</li> <li>• Is this only for lakes and 'significant' rivers?</li> </ul>
Jeremy Wales	194	Oppose	A mad rule - drop it.	<ul style="list-style-type: none"> <li>• Financial implications.</li> <li>• Stock need water, land should be accessed at lowest possible cost.</li> <li>• Definitions vague.</li> <li>• Compliance decisions will be arbitrary, regardless of effect.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 194 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	13.5.A.0.1 be retained as currently drafted.	<ul style="list-style-type: none"> <li>• Supports rule.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i></li> <li>• <i>Particularly opposes retention of Rule 13.5A.0.1 as notified.</i></li> </ul>
Hopefield Investments Ltd (R Griffiths)	200	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.  Extension of the proposed time frame to permit of 1 above.	<ul style="list-style-type: none"> <li>• Costs associated with compliance.</li> <li>• Proposed time frames insufficient.</li> <li>• Unknown implementation management of changes by ORC.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 200 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Concerns with implications of plan change on farming and flow-on effects to region.</i></li> <li>• <i>Lack of scientific basis for limits and decisions.</i></li> <li>• <i>Lack of clarity around implementation and achievability of standards and limits.</i></li> </ul>
Trustpower Limited	206	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> <li>• Support ensuring bed disturbance by stock has no significant adverse effect.</li> <li>• Support making bed crossings more permissive.</li> </ul>
Poplar Grove Station Ltd	208	Amend	Rule 13.5A.0.1 is too wide in definition and impractical to a sheep farming operation.	<ul style="list-style-type: none"> <li>• Cost of fencing and water reticulation affects viability of farm.</li> </ul>
<i>Federated Farmers of New</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 208 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Lakes Landcare	210	Amend	Modify/change.	<ul style="list-style-type: none"> <li>• Impractical. Will stop stock moving through creeks or around lake margins.</li> </ul>
Rimu Downs Ltd	219	Oppose	Oppose the prohibition of stock crossing waterways to access grazing on extensive farms.	<ul style="list-style-type: none"> <li>• Better to work on case-by-case basis rather than blanket rule.</li> <li>• Not economically practical to install authorised structures for every lake, river, wetland.</li> <li>• On extensive farms, effects of stock crossing waterways is minimal or nil.</li> </ul>
Lauren O'Brien	229	Amend	Limit passage of stock through larger bodies of water.	<ul style="list-style-type: none"> <li>• Peninsula has many small creeks that would be difficult and expensive to fence stock out.</li> <li>• Landowners no longer keep stock due to costs.</li> <li>• Land is being overrun with weeds. Adding more rules and costs will only add to this problem.</li> </ul>
Rowley Family	230	Oppose	This rule is too wide ranging.	<ul style="list-style-type: none"> <li>• Would make farming impossible.</li> <li>• Can see where ORC is heading and applaud aims but must allow common sense to prevail.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 230 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> </ul>
N Anderson	231	Amend	Each area needs to be considered for its own merits.  That on lower country ... approaches more prone to damage and large numbers of large pooping cattle are regularly crossing reasonably large streams/riders, bridges and culverts plus the fencing off of waterways is essential for water quality and protection of the flora and fauna of such areas.	<ul style="list-style-type: none"> <li>• Stock regularly moved for health/food reasons (not seasonal muster).</li> <li>• Impractical, inefficient, unnecessary and expensive to put in bridges and culverts.</li> <li>• Too inflexible, need to consider number/type of animals, size/significance/type of waterway, duration of disturbance.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 231 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> </ul>
Kawarau Station Limited	232	Oppose	Delete.	<ul style="list-style-type: none"> <li>• Definition of seasonal muster different for each property.</li> <li>• Unable to move stock between grazing blocks.</li> <li>• Effect needs to be monitored not absolute prohibition.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 232 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
C C & G A Raughan	236	Amend	Amend rule to allow for situations where it is not feasible to put in a stock crossing.	<ul style="list-style-type: none"> <li>• What is seasonal muster?</li> <li>• Fencing spring fed stream on property with steep sides would cause major erosion (digger and bulldozer work).</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 236 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
N O Grant	239	Oppose	Delete this rule.	<ul style="list-style-type: none"> <li>• Impossible to implement.</li> <li>• Excludes stock from drinking water.</li> <li>• Makes farm financially unviable and impossible to operate.</li> <li>• Would require fencing and numerous bridges.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 239 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Forest Range Ltd	240	Oppose	These rules need deletion or considerable amendment to provide common sense and flexible solutions that will allow livestock enterprises on high country properties to continue farming in a sustainable manner.	<ul style="list-style-type: none"> <li>• Impact farmers on extensive properties.</li> <li>• Stock could cross river in paddock frequently.</li> <li>• Fencing not possible or affordable.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 240 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Rule uncertain. Issue of viability where existing practices have no effects or alternatives.</i></li> <li>• <i>Alternative to crossings may be unfeasible and not cost effective.</i></li> </ul>
Fonterra Co-operative Group Limited	241	Amend	Change this rule to specify independently verifiable standards such as a maximum turbidity change. Change the reference to "seasonal muster" and replace with more specific quantifiable limits that would ensure the attainment of a numerical water quality objective.	<ul style="list-style-type: none"> <li>• Absolute prohibition is not justified based on environmental outcomes.</li> <li>• Potentially unnecessary expenditure to land owners.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited status unworkable. Crossings essential to farming operations, alternatives not practical or cost effective.</i></li> </ul>
Sandy Bay Ltd	249	Amend	Amend rule to allow for situations where it is not feasible to put in a stock crossing and stock movement is needed outside of seasonal muster.	<ul style="list-style-type: none"> <li>• If a stream is flowing through paddock (large area) a crossing is not effective without fencing the whole stream.</li> <li>• Some areas can be re-fenced to realign them around waterways but isn't possible everywhere.</li> <li>• Time and financial budgeting is required to meet rule but isn't allowed as rule has effect now.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 249 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited status unworkable. Crossings essential to farming operations, alternatives not practical or cost effective.</i></li> </ul>
Graeme & Jane Hogg	265	Amend	Slow down these changes. They must be more flexible. Work in with farmers with options to their particular problems rather than hitting them with a sledge hammer when a tap will do.	<ul style="list-style-type: none"> <li>• Local environment is not always suitable for culverts.</li> <li>• Changes must be gradual and must take into account other users, e.g. recreational.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 265 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited status unworkable. Crossings essential to farming operations, alternatives not practical or cost effective.</i></li> </ul>
Colin Scurr	268	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for on a case by case basis.	<ul style="list-style-type: none"> <li>• Ambiguity around 'seasonal muster'.</li> <li>• Does not provide for emergencies, exceptional circumstances.</li> <li>• No environmental basis for such a broad prohibition.</li> <li>• Does not allow for a case by case assessment of the effects of the discharge.</li> <li>• Objectives and Policies do not provide support for prohibited status.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Based on activity not effects, unfair where existing practices have no effects or alternatives.</i></li> </ul>
Marc Schallenberg	270	Amend	The proposed plan change should be amended to include a goal of excluding farm stock from the beds of rivers, lakes and wetlands by 2017. Farm stock should be prohibited from disturbing these beds at all times (for any purpose). However, where absolutely necessary, rare occurrences of bed disturbance could be permitted for the purpose of stock movement (e.g. Seasonal muster). Permits should be sought from the ORC for any such disturbance of the beds.	<ul style="list-style-type: none"> <li>• Exclusion of stock from waterways key to safeguarding water quality, ecological and recreational values.</li> <li>• Need for alignment with goals of Clean Streams Accord and environmental goals of many regional councils.</li> <li>• Need to fence off buffer zone of 10 m from river banks and buffer zone of 20 m from lake shores.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 270 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Suggested timeframes and fencing requirements unachievable.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose in part submission 270 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Oppose in relation to the excessive buffer zones requiring fencing that are proposed.</i></li> </ul>
Forest and Bird	271	Support	Retain 13.5A.0.1 as publicly notified.	<ul style="list-style-type: none"> <li>• Support this rule.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Background data required before any agricultural activities are restricted.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 120		<ul style="list-style-type: none"> <li>• Not practical to minimise the use of all beds and rivers and lakes and wetlands.</li> </ul>
Mr RJ Borst	1034	Oppose submission 271 ref. 120		<ul style="list-style-type: none"> <li>• Not practicable to minimise the use of all beds of rivers and lakes and wetlands.</li> <li>• Background data required before any steps are taken to restrict agricultural activities.</li> <li>• Limitations on animal waste discharges are unnecessary and inappropriate.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Glenshee Station Limited	1062	Oppose submission 271 ref. 120		<ul style="list-style-type: none"> <li>• Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
ALT Holdings Ltd	274	Oppose	<p>ORC to consult with farming groups to ensure any new rules are workable for the farmer, and that not only the environmental impact but also the social economical and cultural impacts have been considered.</p> <p>Would like to see evidence that suggests our current farming (non-intensive) practices are having a negative impact on water quality.</p> <p>Would like the authority to tell me in detail what evidence they have that will show that the suggested changes will in fact increase or protect our water quality more so than our current farming methods.</p>	<ul style="list-style-type: none"> <li>• Oppose rule as not workable or practical.</li> <li>• Fencing comes at huge cost.</li> <li>• No evidence provided that changes will protect or improve water quality from current.</li> </ul>
Federated Farmers of New Zealand	1057	Support in part submission 274 ref. 120		<ul style="list-style-type: none"> <li>• Rules must be practical and have scientific basis.</li> <li>• Prohibited status not justified.</li> </ul>
Federated Farmers of New Zealand	278	Amend	Amend rule from being prohibited to restricted discretionary activity.	<ul style="list-style-type: none"> <li>• Prohibited status is unworkable, impracticable and unrealistic particularly for hill country sheep and beef farmers.</li> <li>• More practical and user friendly to provide alternative status (to permitted or prohibited) requiring consent, that balances environmental objectives and farming operations.</li> <li>• ORC should have power to decline or seek conditions that provide certainty that effects will be appropriately managed by the consent holder.</li> </ul>
Albert McTainsh	1004	Support submission 278		<ul style="list-style-type: none"> <li>• Practical and workable alternatives, solutions and suggestions.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 120</i>		
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 120</i>		<ul style="list-style-type: none"> <li>• Stock crossing regionally significant wetlands, lakes and rivers can have a significant adverse effect on water quality.</li> <li>• Appropriate that it remains a prohibited activity.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 120</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose in part submission 278 ref. 120</i>		<ul style="list-style-type: none"> <li>• Stock crossing regionally significant wetlands and lakes and rivers has the potential to significantly adversely affect water quality.</li> <li>• Concerns about practicability and workability can be addressed through framing of rule.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Support in part submission 278 ref. 120</i>		<ul style="list-style-type: none"> <li>• Notified rule unworkable and unrealistic.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 120</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
Waitensea Ltd	290	Amend	Allow stock to cross over a stream or water source if on a culvert or bridge - but the bridge should not have to be authorised.	<ul style="list-style-type: none"> <li>• Cost and administration problem.</li> <li>• Too many consents already.</li> </ul>
Deer Industry New Zealand	293	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary to allow consent to be applied for, considered on a case by case basis.	<ul style="list-style-type: none"> <li>• Prohibited status removes ability to gain resource consent.</li> <li>• Does not appear to be any environmental basis for prohibited status (Section 68 RMA).</li> <li>• Does not provide for emergencies, exceptional circumstances, constraints and management of deer.</li> <li>• Ambiguity around "seasonal muster"</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 293 ref. 120</i>		<ul style="list-style-type: none"> <li>• Uncertainty for farmers.</li> <li>• Based on activity not effects, unfair where existing practices have no effects, and no practical or cost effective alternatives.</li> <li>• Lesser activity status appropriate.</li> </ul>
Clydevale Dairy Farms Ltd	297	Amend	That this rule be amended to discretionary activity status with ephemeral beds, thalwegs and small streams excluded from the rule.	<ul style="list-style-type: none"> <li>• Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report.</li> <li>• Not justified by any analysis of actual or potential effects.</li> <li>• Impractical because definition of 'river' includes any flow channel that may carry water under heavy rain. Stopping stock crossing such land is impractical and does not relate to environmental effects.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 297 ref. 120</i>		<ul style="list-style-type: none"> <li>• Uncertainty for farmers.</li> <li>• Based on activity not effects, unfair where existing practices have no effects, and no practical or cost effective alternatives.</li> </ul>
Greenfield Farming Ltd	298	Amend	That this rule be amended to discretionary activity status with ephemeral beds, thalwegs and small streams excluded from the rule.	<ul style="list-style-type: none"> <li>• Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report.</li> <li>• Not justified by any analysis of actual or potential effects.</li> <li>• Impractical because definition of 'river' includes any flow channel that may carry water under heavy rain. Stopping stock crossing such land is impractical and does not relate to environmental effects.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 298 ref. 120</i>		<ul style="list-style-type: none"> <li>• Uncertainty for farmers.</li> <li>• Based on activity not effects, unfair where existing practices have no effects, and no practical or cost effective alternatives.</li> </ul>
Big River Dairy Limited	299	Amend	That this rule be amended to discretionary activity status with ephemeral beds, thalwegs and small streams excluded from the	<ul style="list-style-type: none"> <li>• Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			rule.	<ul style="list-style-type: none"> <li>• Not justified by any analysis of actual or potential effects.</li> <li>• Impractical because definition of 'river' includes any flow channel that may carry water under heavy rain. Stopping stock crossing such land is impractical and does not relate to environmental effects.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 299 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Based on activity not effects, unfair where existing practices have no effects, and no practical or cost effective alternatives.</i></li> </ul>
Graylands Farms Ltd	302	Amend	Add (c) Excluding where installing any authorised structure over water would cause considerable environmental disturbance.	<ul style="list-style-type: none"> <li>• Places exist where stock crossings not practical or feasible to locate or access, e.g. goat track around a mountain.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 302 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Based on activity not effects, unfair where existing practices have no effects or alternatives.</i></li> </ul>
The Director-General of Conservation	306	Amend	<p>The giving of full effect to the following new rule, or to like effect: 13.5.1.8.C From 1 July 2014 the disturbance of the bed of any river which is wider than a metre, deeper than 30 cm and flowing all year; and all lakebeds; or any Regionally Significant Wetland, by dairy cows is a discretionary activity.</p> <p>The giving of full effect to the following new rule, or to like effect: 13.5.1.8D From 31 March 2017 the disturbance of the bed of any river, intermittent water body, all lakebeds or any Regionally Significant Wetland by dairy cows is a discretionary activity.</p> <p>Retain 13.5A.0.1 as publicly notified.</p> <p>The giving of full effect to the following new definition, or to like effect: Seasonal muster - The seasonal shifting of stock, being 1 shift per season.</p>	<ul style="list-style-type: none"> <li>• Significant aquatic values can be adversely affected by bed disturbance.</li> <li>• Fonterra have committed to excluding dairy cattle from all "Accord" waterways by 2014.</li> <li>• Significant habitats are located in smaller waterways and lakes. New rule required to recognise this and meet turbidity standards.</li> <li>• Stock movements are likely to adversely affect RMA S 6(c) values.</li> <li>• Seasonal muster should be defined so all plan users can be aware of their rights and responsibilities.</li> </ul>
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts.</i></li> <li>• <i>Prevents normal and safe access to properties.</i></li> <li>• <i>Approach does not acknowledge local environmental conditions.</i></li> <li>• <i>Contrary to the purpose of the RMA.</i></li> </ul>
<i>DJ &amp; KR Scott</i>	1008	<i>Oppose submission 306 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</i></li> <li>• <i>Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>No evidence from environmental impacts from agricultural activities.</i></li> <li>• <i>Changes are vague, unclear and open-ended.</i></li> <li>• <i>Restrictions are inappropriate and have adverse effects on farming operations.</i></li> </ul>
<i>Auripo Enterprises Ltd</i>	1017	<i>Oppose submission 306 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Difficulties with specific definition of seasonal muster.</i></li> <li>• <i>More appropriate to provide for occasional movement of stock across water.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Would impact on farming operation.</i></li> <li>• <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li>• <i>Costs of the proposed changes outweigh the benefits.</i></li> <li>• <i>Livestock access to natural waterways is a vital part of our management policy.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hopefield Investments Ltd	1019	Support submission 306 ref. 120		<ul style="list-style-type: none"> <li>• Operation relies on natural streams for continuing viability.</li> <li>• Plan change has huge impact on farming business.</li> <li>• Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
JH William & KA McNally	1020	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>• Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
RJ McNally	1021			
Kim & Mary Heany	1024			
TJ & NM Arthur	1026	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>• Hindrance to farming practices and threat to viability of farm.</li> <li>• Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>• Creeks are not in their original beds.</li> <li>• Stock lightly grazing the waterways protects fish habitat and water quality.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>• Too stringent.</li> </ul>
Ida Valley Station / Ida Valley Irrigation Co	1033	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>• The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</li> <li>• Would have a huge impact on farming operation.</li> <li>• Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</li> <li>• Costs of proposed changes outweigh any potential benefits.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> <li>• Restrictions on seasonal musters are inappropriate and have adverse effects on the farming activities.</li> <li>• Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> <li>• Nothing to be gained from high and costly level of consenting requirements if ORC cannot monitor and enforce.</li> <li>• Proposed changes would require an enormous number of staff to monitor.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> </ul>
Hawkdun Station	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>Shouldn't restrict necessary farming discharges.</li> <li>No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>Sought changes vague, unclear and open-ended.</li> <li>Restrictions on seasonal musters are inappropriate and have adverse effects on the farming activities.</li> <li>Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> <li>Nothing to be gained from high and costly level of consenting requirements if ORC cannot monitor and enforce.</li> <li>Proposed changes would require an enormous number of staff to monitor.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>Precluding dairy cows from the permitted activity is contrary to the effects-based intent and is targeting land use.</li> <li>Musters are required for more than seasonal movement of stock.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>Concerns addressed elsewhere in plan.</li> <li>Not shown why additional measure necessary.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>Oppose proposed new rule 13.5.1.8C, impractical to implement.</li> <li>Oppose proposed new rule 13.5.1.8D. "Intermittent water body" presumably covers ephemeral water courses and swales in paddocks that flow after heavy rain. Even more impractical than proposed 13.5.1.8C.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 120		<ul style="list-style-type: none"> <li>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>Rules fail relevant tests under section 32 RMA.</li> <li>Additional controls not justified in terms of effects.</li> <li>Seek the submission be disallowed.</li> </ul>
Clutha District Council	308	Amend	Rule be amended to identify conditions that must be breached for the activity to be prohibited, and to provide for use of lawful structures.	<ul style="list-style-type: none"> <li>Rule is based on the activity rather than environmental effects.</li> <li>Use of word 'authorised' implies consent or authorisation - many older structures will have been lawful when installed but have no formal proof of authorisation.</li> </ul>
Dunedin City Council	1025	Support submission 308 ref. 120		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
Strath Taieri Community Board	1029	Support submission 308 ref. 120		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Central Otago Wine Growers Association	1054	Support submission 308		<ul style="list-style-type: none"> <li>Support submission in relation to livestock crossing.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>ref. 120</i> <i>Support submission 308</i> <i>ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Based on activity not effects, unfair where existing practices have no effects, and no viable alternatives to waterways access.</i></li> </ul>
Glen Dene Limited	310	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> <li>• Removes all ability for consent to be granted and scope for case-by-case assessment.</li> <li>• Prohibits crossing of stock with no environmental basis.</li> <li>• Prohibited status not justified.</li> <li>• Does not provide for emergencies or exceptional circumstances.</li> <li>• Ambiguity around what 'seasonal muster' is.</li> </ul>
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 - 326</i> <i>ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Uncertainty for farmers.</i></li> <li>• <i>Based on activity not effects, unfair where existing practices have no effects, and no viable alternatives to waterways access.</i></li> <li>• <i>Removes case by case assessment and consent option.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326</i> <i>ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</i></li> </ul>
Lone Star Farms Ltd	327	Amend	Amend b) excluding seasonal musters any river crossing used less than once per month.	<ul style="list-style-type: none"> <li>• Braided rivers change course after every major rain event, causing crossing places to change as well.</li> <li>• Allowing for seasonal musters is not enough to accommodate stock management and protect the environment.</li> <li>• Need an allowance of one crossing per month for country that is farmed extensively.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 327</i> <i>ref. 120</i>		<ul style="list-style-type: none"> <li>• <i>Ensure disturbance limited to significant adverse effects.</i></li> <li>• <i>Some situations occur outside planned farming activities.</i></li> <li>• <i>Some waterways are impossible to fence and either no alternatives or none that are cost effective.</i></li> </ul>

## 121 Chapter 15 - Methods

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
University of Otago, Department of Zoology	57	Amend	Consider cross referencing the Methods Other than Rules Section 15.4.2 of the Water Plan and adding a sentence on continuing to work with landowners on matters of monitoring and compliance.	<ul style="list-style-type: none"> <li>• Better explanation of how effects-based approach should work in practice needed.</li> </ul>
Roger Fox	82	Oppose	Should be maintained.	<ul style="list-style-type: none"> <li>• Important ORC function.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 82 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
Dairy NZ Limited	146	Oppose	Change the plan to provide a clear implementation method that provides support for voluntary and/or regulatory codes of practice or standards that would assist in the achievement of specified environmental outcomes.	<ul style="list-style-type: none"> <li>• Benefit to collaboratively developing codes of practice and standards.</li> <li>• Potentially used as regulatory provisions.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 146 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i></li> </ul>
Irrigation New Zealand Incorporated	202	Oppose	It is important ORC continues to partner with industry and consent holders in the development of Codes of Practice, Standards and Environmental Management Systems and reinforce their uptake through the policy framework.	<ul style="list-style-type: none"> <li>• Concerned with deletion.</li> <li>• Effective tools.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 202 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
Jeremy Bisson	223	Oppose	Clarification of why the methods have been repealed.	<ul style="list-style-type: none"> <li>• Public consultation was about less regulation and working with farming community to ensure good farming practices are used.</li> <li>• Sees this as the one section that could be used to actually achieve this.</li> </ul>
Silver Fern Farms Limited	238	Oppose	This is inconsistent with other parts of plan where encouraging land owners/users to adopt best practice.	<ul style="list-style-type: none"> <li>• Indicates ORC no longer wants industry led codes of practice or other voluntary methods.</li> </ul>
Fonterra Co-operative Group Limited	241	Amend	Change the plan to provide a clear implementation method that provides support for voluntary and/or regulatory codes of practice or standards that would assist in the achievement of specified environmental outcomes.	<ul style="list-style-type: none"> <li>• Benefit to collaboratively developing codes of practice and standards.</li> <li>• Potentially used as regulatory provisions.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Voluntary codes of practice have so far failed to achieve high enough water quality.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Oppose	Seeks the inclusion of section 15.5 in the Water Plan.	<ul style="list-style-type: none"> <li>• No explanation or evaluation for adopting this amendment in S 32 Report.</li> <li>• Deleting methods is inappropriate and doesn't send clear message to users that best practice is promoted and rewarded.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support</i>		<ul style="list-style-type: none"> <li>• <i>Section 32 assessment is inadequate.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr NS Mackenzie</i>	1035	<i>submission 248 ref. 121</i>		
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 248 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
Sandy Bay Ltd	249	Oppose	Retain methods.	<ul style="list-style-type: none"> <li>• Want certainty that ORC will publically continue to provide support.</li> <li>• Don't want to have to apply each year through annual plan process for funding.</li> <li>• If it's in water plan then it automatically occurs?</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc	252	Oppose	Seeks the inclusion of section 15.5 in the Water Plan.	<ul style="list-style-type: none"> <li>• No explanation or evaluation for adopting this amendment in the Section 32 Report.</li> <li>• Deleting methods is inappropriate and doesn't send clear message to users that best practice is promoted and rewarded.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 252 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Section 32 assessment is inadequate.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 252 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
Waitaki Irrigators Collective Limited	257	Oppose	Concerned with the deletion of 15.5.	<ul style="list-style-type: none"> <li>• Important that ORC continues to partner with industry and consent holders in development of codes of practice, standards and environmental management systems and reinforce their uptake through policy framework.</li> <li>• Methods an effective tool for achieving freshwater objectives.</li> <li>• ORC previously advocated and successfully implemented GMP/ASM approach.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 257 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
North Otago Irrigation Company	260	Oppose	Crucial that these methods continue to be recognised by ORC.	<ul style="list-style-type: none"> <li>• These methods have an important role in addressing water quality issues.</li> <li>• Understand method removed to streamline plan, not because ORC no longer supports use of these methods.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i></li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Support the NOIC submission in full.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 260 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
Ballance Agri-Nutrients Ltd	262	Oppose	Seek the inclusion of Section 15.5 in the Water Plan.	<ul style="list-style-type: none"> <li>• No explanation or evaluation of adopting this amendment in Section 32 Report.</li> <li>• Deleting methods is inappropriate and doesn't send clear message to users that best practice is promoted and rewarded.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Section 32 assessment is inadequate.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport</i>	1038			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 262 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>
Horticulture New Zealand	269	Oppose	Retain provisions in 15.5 Methods other than rules for Codes of practice and environmental management systems.	<ul style="list-style-type: none"> <li>• Effective and efficient mechanisms to use.</li> <li>• Assist with achieving environmental outcomes that are practical, workable and measurable.</li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Oppose deletion of 15.5 - codes of practice and environmental management systems. Horticultural sectors have wide spread adoption of NZGAP quality assurance programme that is recognised by multi-national global retailers as responsible stewardship of resources.</i></li> <li>• <i>ORC would be ill advised to lost recognition of these internationally recognised programmes.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 269 ref. 121</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms stated in their original submission that voluntary methods important to achieve plan outcomes and deletion of these methods is inconsistent with the plan where the adoption of best practice is being encouraged.</i></li> <li>• <i>Therefore, submissions with the intent of retaining Chapter 15 Methods (other than rules) are supported.</i></li> </ul>

#### 124 Information requirement 16.3.3 - The discharge of water or contaminants

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
University of Otago, Department of Zoology	57	Amend	Add a clause which requires the applicant to seek confirmation from Council that no threatened native fish are present in the area resource consent has been applied for. If threatened fish populations have previously been identified in the area, then an adequate fish assessment involving electric fishing or trapping must be conducted by a suitably qualified expert. Add a comprehensive map to the Water Plan which identifies	<ul style="list-style-type: none"> <li>• Information required for consent application falls short of providing adequate protection to freshwater biodiversity.</li> <li>• To give effect to the NPS for Freshwater Management 2011 and promote the purpose of the RMA.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			populations of threatened freshwater fish. If the area for which consent is sought falls within identified native fish habitat areas the landowner must seek an adequate fish assessment of the area as above.	
Contact Energy Limited	1013	Oppose in part submission 57 ref. 124		<ul style="list-style-type: none"> <li>Level of investigation would be beyond that required by the 4th Schedule of the Act, because unrelated to the potential for adverse effects.</li> <li>However, identification of the habitat of threatened freshwater species by ORC would be a useful addition to the plan.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Support submission 57 ref. 124		<ul style="list-style-type: none"> <li>Protects habitats and wider needs of mahika kai, taoka species and other species of importance to Kai Tahu ki Otago.</li> </ul>
Silver Fern Farms Limited	238	Oppose	<p>Seeks the retention of information requirements for the discharge of water contaminants or the replacement with a comparative alternative.</p> <p>In the alternative, we seek clarification as to whether the general information requirement (section 16.2) will be considered as sufficient information for discharge to water consent applications.</p>	<ul style="list-style-type: none"> <li>Queries intention of its removal.</li> <li>Could infer information under general requirements is sufficient, or discharges won't be allowed.</li> </ul>
Horticulture New Zealand	269	Oppose	Retain 16.3.3 Information requirements.	<ul style="list-style-type: none"> <li>12.C.2.1 should be widened to provide for a range of activities. Therefore, 16.3.3 should be retained.</li> </ul>
Silver Fern Farms Limited	1070	Support in part submission 269 ref. 124		<ul style="list-style-type: none"> <li>Silver Fern Farms sought the retention of this section in its original submission and therefore supports the intent (with no bias) to retain Section 16.3.3 information requirements also.</li> </ul>

### 125 Schedule 15 - Good quality water

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Green Party (Dunedin Branch)	62	Support	Consider the proposed contaminant limits for surface water are adequate.	<ul style="list-style-type: none"> <li>Decline in water quality related to intensive agriculture.</li> <li>ORC to accept responsibility for decline in water quality.</li> <li>Under proposed rules how long for water bodies to return to pristine state?</li> <li>Issue urgent, don't let it drift for 5 years.</li> </ul>
Craiglea Limited	1012	Oppose submission 62 ref. 125		<ul style="list-style-type: none"> <li>Two year period too short.</li> </ul>
Mr RJ Borst	1034	Oppose submission 62 ref. 125		<ul style="list-style-type: none"> <li>No reason stated.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 62 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms submitted against the adoption of Schedule 15 in its current form and therefore oppose submissions in support of its inclusion as it stands.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Does not allow flexibility for existing farming operations to give effect to the NPS.</i></li> <li>• <i>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</i></li> <li>• <i>Does take into account local environmental conditions and economic/development consideration.</i></li> <li>• <i>Disproportionate and overly restrictive.</i></li> </ul>
Elderslie Dairy Farms Limited	115	Amend	Revisit standards on water quality and set them at a level landowners and farmers can attain in catchments and creeks while still making the practice of farming an economically viable one.	<ul style="list-style-type: none"> <li>• Proposed standards are unachievable even with changes to farming management, fencing and riparian planting.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 115 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and extend transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
The Cow Farm Limited	133	Oppose	The targets should be developed in consultation with stakeholders and should be withdrawn until such time as practical, science based targets can be imposed.	<ul style="list-style-type: none"> <li>• Targets do not take into account natural differences in each environment.</li> <li>• No scientific justification for generic standards; no evidence that water quality will be improved as a result of the restrictions.</li> <li>• No logic behind target dates; no evidence of adverse effects if dates are not complied with.</li> </ul>
Clutha Agricultural Development Board	139	Amend	Clarification of whether the values should never be breached in any test.	<ul style="list-style-type: none"> <li>• Denies natural variations and ignores difficulties and inaccuracies involved in one-off testing as shown in research.</li> </ul>
Otago Conservation Board	140	Amend	Withdraw Plan Change 6A; or amend Schedule 15 to better reflect the differing receiving environments and the issues they face using historic monitoring records to set specifically targeted limits and goals for the improvement of each waterway.	<ul style="list-style-type: none"> <li>• Supports the use of descriptive characteristics.</li> <li>• Limits too low for some waterways and could lead to the deterioration of water quality in Otago.</li> <li>• Implementation timeframes and standards should take into account TA plans for ongoing maintenance and upgrading of their water treatment plants.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Oppose in part submission 140 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Agrees that specifically targeted limits and goals are desirable for each waterway, to better reflect the differing receiving environments.</i></li> <li>• <i>The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</i></li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 140 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 15 should be amended.</i></li> <li>• <i>Amendments should be informed by a robust section 32 analysis and should take into account spatial variability.</i></li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 140 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Division of region into five categories is not appropriate.</i></li> <li>• <i>Categories do not reflect characteristics of water bodies.</i></li> <li>• <i>Amending the Schedule would be helpful and lead to more appropriate standards.</i></li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 140 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Concerns about the current limits in Schedule 15 allowing for degradation in headwater catchments.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr RJ Borst	1034	Support in part submission 140 ref. 125		<ul style="list-style-type: none"> <li>• Supports withdrawal of the plan.</li> <li>• Agree plan provisions are unclear and complex.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support submission 140 ref. 125		<ul style="list-style-type: none"> <li>• Must be amendments to limits and transition times.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Support submission 140 ref. 125		<ul style="list-style-type: none"> <li>• Protects habitats and the wider needs of mahika kai, taoka species and other species of importance to Kai Tahu ki Otago.</li> </ul>
The NZ Transport Agency	1073	Support submission 140 ref. 125		<ul style="list-style-type: none"> <li>• Division of the region into five broad categories as proposed not considered to be appropriate. Categories that broad do not reflect different characteristics of water bodies.</li> <li>• Amendments proposed helpful and could lead to more appropriate receiving water standards being set.</li> <li>• Seek the submission is allowed and the schedule amended as per the submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 140 ref. 125		<ul style="list-style-type: none"> <li>• Schedule 16 does not take into account local environmental conditions and economic/development consideration.</li> <li>• Schedule 16 is disproportionate and overly restrictive.</li> </ul>
Eloise Neeley	141	Amend	Increase the lead in time for the adoption of Schedule [15] and ensure that the standards are realistic and achievable.	<ul style="list-style-type: none"> <li>• Current proposal has far reaching effects on farming viability and doesn't provide sufficient time to modify farming or know how such modification should occur.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 141 ref. 125		<ul style="list-style-type: none"> <li>• Must be amendments to limits and transition times.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
Ernslaw One Ltd	149	Amend	Amend Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12, to be informed	<ul style="list-style-type: none"> <li>• Recognise importance of Schedule 15 but oppose stringent turbidity units and their impact on forest owners.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			by the recommendation of the Land and Water Forum, and aligned.	<ul style="list-style-type: none"> <li>LAWF recommends community consultation when setting limits (catchment by catchment basis).</li> </ul>
Grant Ludemann	191	Amend	<p>Kakanui River should be classified as a short accrual river. Instead of triple N going from 0.444 to 0.075 a difference of 6 times and 4.33 times for DRP.</p> <p>Wildlife should be taken into account when determining appropriate levels for E coli.</p>	<ul style="list-style-type: none"> <li>This was proposed in consultation.</li> <li>A graduated scale is more appropriate.</li> <li>Wildlife plays a large part in E coli levels.</li> </ul>
Dairy Holdings Limited	195	Oppose	The standards/targets set out in the Schedule (along with the wider plan change) need to be withdrawn until these matters [below in the reasons] can be worked through in a collaborative manner.	<ul style="list-style-type: none"> <li>Overly simplistic, unlikely to be useful.</li> <li>'Good water quality' is not well defined, some requirements cannot be achieved (e.g. 'colour-free').</li> <li>Little technical support.</li> <li>Discharge limits (as opposed to catchment load limits) not practicable for diffuse pollution.</li> <li>Will be difficult, onerous and costly for individual farmers to measure discharge.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	<i>1031</i>	<i>Support submission 195 ref. 125</i>		<ul style="list-style-type: none"> <li>Submission outlines concern of further submitter.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 195 ref. 125</i>		<ul style="list-style-type: none"> <li>Amend limits and extend transition times to allow reassessment.</li> <li>Must be stronger links between discharge compliance and environmental improvements.</li> <li>Needs to be more science informed decision making.</li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 195 ref. 125</i>		<ul style="list-style-type: none"> <li>Support in part, particularly regarding wider effect of the plan change.</li> <li>Although it doesn't request total withdrawal the submission recognises lack of specificity of controls and concern for lack of evidence supporting discharge limits, particularly given reliance on prohibited activity status.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 195 ref. 125</i>		<ul style="list-style-type: none"> <li>Clarification required to references of 'good quality water' and 'natural and human use values'.</li> </ul>
Clyde Dairy Farm Ltd	196	Oppose	Some of your targets for water quality are unreasonably high.	<ul style="list-style-type: none"> <li>Water quality and farming practices have improved immensely in lower Clutha.</li> <li>Maintaining high environmental standards is paramount, but should not be exclusively to farmers' financial detriment.</li> </ul>
Irrigation New Zealand Incorporated	202	Amend	<p>Agrees that it is not practicable to set limits for each individual catchment [as per NPSFW], however there is a need for greater engagement with communities at the sub-region level than has occurred in this instance.</p> <p>If limits are set at the farm level they must relate to the desired state of the freshwater body in question, taking into account the assimilative capacity of the environment and its attenuation factors.</p>	<ul style="list-style-type: none"> <li>First set freshwater objectives then set limits accordingly.</li> <li>Objectives and limits include environmental, social, cultural, and economic values.</li> <li>Need robust decision making.</li> <li>Unclear how attenuation is factored into limits.</li> <li>Mitigations for increasing assimilative capacity must be enabled.</li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support in part submission 202 ref. 125</i>		<ul style="list-style-type: none"> <li>Support the need for greater community engagement.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 202 ref. 125</i>		<ul style="list-style-type: none"> <li>Amend limits and extend transition times to allow reassessment.</li> <li>Must be stronger links between discharge compliance and environmental improvements.</li> <li>Needs to be more science informed decision making.</li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 202</i>		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 125</i>		<i>prohibited activity status.</i>
NZ Transport Agency	203	Amend	Revise Schedule 15 to: a. Divide the region up on a more rational basis. b. Specify that the receiving water targets are medians. c. Clarify that the targets will be monitored by the ORC as part of the State of the Environment monitoring programme, not for example in worst case scenarios such as immediately after rainfall. d. The targets will not be applied as maximums when implementing Plan Change 6A. e. Specify more appropriate dates for those catchments that do not currently comply with the Schedule 15 targets.	<ul style="list-style-type: none"> <li>• Current division of Otago is not appropriate.</li> <li>• One single standard for entire river does not recognise differences in different parts of catchment.</li> <li>• Contaminant limit document supporting plan change uses medians from SOE datasets.</li> <li>• Targets could be interpreted as maximums.</li> <li>• 5 years to comply not assessed in the plan change or S32 Report. Highly stringent and may not be achievable.</li> <li>• Recognises scums and foams occur naturally and not an effect that needs avoided, remedied or mitigated.</li> </ul>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support in part submission 203 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Supports the desirability of recognising the differences in different parts of each significant catchment.</i></li> </ul>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 203 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 203 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Basis for dividing region not appropriate and doesn't recognise catchment differences.</i></li> <li>• <i>Need clarity around targets and revision of target dates to ensure they're achievable.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support submission 203 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Support in part in so far as the submission highlights that the current division of Otago is not appropriate and one single standard for an entire river does not recognise differences in different parts of the catchment.</i></li> </ul>
M C Holland Farming Ltd	207	Oppose	The water quality targets and timeframes contained in Schedule 15 for the Waianakarua catchment are revised to be appropriate and achievable, or the Waianakarua catchment is classified as a short accrual catchment, or more than two categories are established for catchments in Otago to avoid the issues raised with catchments such as the Waianakarua that sit right on the boundary of the current categories.	<ul style="list-style-type: none"> <li>• Waianakarua doesn't meet NNN or DRP targets, but would if classified as "short accrual".</li> <li>• Waianakarua on margin between short and long accrual groups.</li> <li>• Waianakarua has good water quality, not been of concern to ORC.</li> <li>• Concerned that nutrient guidelines have been applied as targets in Schedule 15.</li> <li>• <i>Queries 2017 target date as no justification provided.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 207 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and extend transition times to allow reassessment.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Blakely Pacific Limited	209	Amend	Amendment to Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12.	<ul style="list-style-type: none"> <li>• Recognise importance of Schedule 15</li> <li>• Oppose stringent turbidity units and impact these will have on forest owners.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 209 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i></li> </ul>
Dunedin City Council	211	Amend	That Schedule 15 is revised by: Dividing the region up on a more rational basis. Specifying that the receiving water targets: are medians, will be monitored by the ORC as part of its State of the Environment monitoring programme, not for example in worst case scenarios of immediately after rainfall, will not be applied as maximums when implementing PC6A. Specifying more appropriate dates for those catchments that do not currently comply with the Schedule 15 targets.	<ul style="list-style-type: none"> <li>• Current division of region is too broad and does not reflect different water body characteristics.</li> <li>• Single standard for entire length of river not appropriate.</li> <li>• Could be interpreted as maximums.</li> <li>• A five year timeframe for compliance has not been assessed, appears stringent.</li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 211</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>

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		<i>ref. 125</i>		
<i>Clutha District Council</i>	<i>1050</i>	<i>Support submission 211 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 15 requires review.</i></li> <li>• <i>Section 32 analysis was inadequate.</i></li> </ul>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 211 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and extend transition times to allow reassessment.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 211 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i></li> <li>• <i>Greater flexibility should be introduced (particularly in relation to the timeframes).</i></li> </ul>
<i>Vivienne &amp; Greg Kerr</i>	<i>213</i>	<i>Support</i>	<i>Support the use of Table 15.1 as a descriptive measure of water quality and Table 15.2, timeframes for catchments to meet specified measures of good receiving water quality and the maximum limits for nitrogen, phosphorus, E coli, and sediment as set down in the table.</i>	<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Oppose submission 213 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms submitted against the adoption of Schedule 15 in its current form and therefore oppose submissions in support of its inclusion as it stands.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	<i>238</i>	<i>Amend</i>	<i>Plan change 6A needs to reflect that such a high water quality standard is not reasonable or necessary for all water bodies and that such a "one size fits all" approach is an inadequate approach.</i>	<ul style="list-style-type: none"> <li>• <i>Koau Branch too dangerous for contact recreation.</i></li> <li>• <i>Queries if water standards suitable for water use.</i></li> </ul>
<i>Meridian Energy Limited</i>	<i>1014</i>	<i>Support in part submission 238 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>One set of water clarity values to be applied across the region is inappropriate and does not reflect the natural fluvial variability in water bodies.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 238 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and extend transition times to allow reassessment.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
<i>Forest Range Ltd</i>	<i>240</i>	<i>Did not specify</i>	<i>It is essential that ORC contamination limits and monitoring programmes provide flexibility to take intermittent but significant short term adverse effects on water quality into account in relation to the anomalies described.</i>	<ul style="list-style-type: none"> <li>• <i>Undermine current conservation work.</i></li> <li>• <i>Rules need to provide common sense and flexible solutions.</i></li> </ul>
<i>Ravensdown Fertiliser Co-operative Ltd</i>	<i>248</i>	<i>Oppose</i>	<i>Supports in principle the intent of Schedule 15 to define 'good water quality ', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.</i>	<ul style="list-style-type: none"> <li>• <i>Criteria are inadequate and needs further consideration.</i></li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 248 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 15 values are not well defined.</i></li> <li>• <i>Unclear how values will be determined consistently.</i></li> <li>• <i>Imposed limits should be supported by science and technical data.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			

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<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
New Zealand Fertiliser Manufacturers Research Association Inc	252	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> <li>Criteria are inadequate and needs further consideration.</li> </ul>
<i>Mr RJ Borst</i>	1034	Support submission 252 ref. 125		<ul style="list-style-type: none"> <li>Schedule 15 values are not well defined.</li> <li>Unclear how values will be determined consistently.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	Support submission 252 ref. 125		<ul style="list-style-type: none"> <li>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</li> <li>Greater robustness in decision making needed.</li> </ul>
Queenstown Lakes District Council	255	Amend	Amend Schedule 15 to better reflect the differing receiving environments and the issues they face.  Assessment of Schedule 15 matters should take reasonable mixing into consideration.	<ul style="list-style-type: none"> <li>More targeted and accurate standards need to be set.</li> <li>What point in water body does an assessment of Schedule 15 take place.</li> <li>Policy 7.D.1 indicates no mixing and limits applied at point of discharge.</li> </ul>
<i>Contact Energy Limited</i>	1013	Support in part submission 255 ref. 125		<ul style="list-style-type: none"> <li>More targeted and accurate standards should be set.</li> <li>Reasonable mixing should be taken into account in Schedule 15.</li> </ul>
<i>Dunedin City Council</i>	1025	Support		<ul style="list-style-type: none"> <li>Schedules 15 and 16 do not accurately reflect variations between water</li> </ul>

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		<i>submission 255 ref. 125</i>		<i>bodies.</i>
<i>Clutha District Council</i>	<i>1050</i>	<i>Support in part submission 255 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Allowance for appropriate mixing zones should be included.</i></li> <li>• <i>Schedule 15 standards need to be accurate and targeted.</i></li> </ul>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 255 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 255 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Recognition Schedules 15 and 16 don't accurately reflects variations between water bodies.</i></li> <li>• <i>Agreed that allowance for appropriate mixing zones should be included.</i></li> <li>• <i>Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</i></li> <li>• <i>Seeks the submission be allowed and the plan change be amended as per the submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose submission 255 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Rayonier New Zealand Ltd	256	Amend	Amendment to Schedule 15 as may be required to support relief requested for policies and rules in Chapter 12.	<ul style="list-style-type: none"> <li>• <i>Recognise importance.</i></li> <li>• <i>Opposes stringent restriction in relation to turbidity units for permitted activities.</i></li> </ul>
North Otago Irrigation Company	260	Amend	<p>Amend the Schedules to provide clarity as to which waterways are captured under Schedule 15 and which are off farm discharges which must meet the limits under Schedule 16.</p> <p>Clarify how the rules will be applied where watercourses do not discharge to the coast within Otago's regional boundaries.</p> <p>That Schedule 15 is amended so that:</p> <ul style="list-style-type: none"> <li>• The Waiaireka and Kakanui catchments are treated separately.</li> <li>• The Waiaireka catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments.</li> <li>• The Kakanui catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments.</li> <li>• The Schedule 15 objectives are appropriate for the Waiaireka catchment - the ANZECC guidelines for lowland streams could be an alternative. Note that these are slightly higher than the limits currently proposed.</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Supports listed good water characteristics.</i></li> <li>• <i>Difficult to know how and where discharge limits apply where water is discharged to water - would apply where a farm drain or watercourse discharges to a watercourse.</i></li> <li>• <i>Unlisted catchments that do not discharge to the coast are not clearly dealt with in the plan change.</i></li> <li>• <i>In some catchments different limits are appropriate. Certain hydrogeomorphic processes in the Waireka catchment mean the objectives and discharge limits are not appropriate.</i></li> <li>• <i>Waiaireka and Kakanui catchments are different. Both are on boundary between long and short accrual, and were in short accrual group during consultation.</i></li> </ul>
<i>B &amp; J Smith</i>	<i>1006</i>	<i>Support submission 260 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Supports the requirement of further clarity around which waterways and aquifers are included.</i></li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	<i>1031</i>	<i>Support submission 260 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>For reasons set out in the original submission.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 260 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
<i>John Webster</i>	<i>1063</i>	<i>Support submission 260 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i></li> </ul>



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<i>Peter Mitchell</i>	1064	Support submission 260 ref. 125		<ul style="list-style-type: none"> <li>• Support the NOIC submission in full.</li> </ul>
Ballance Agri-Nutrients Ltd	262	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> <li>• Criteria are inadequate and needs further consideration.</li> </ul>
<i>Mr RJ Borst</i>	1034	Support submission 262 ref. 125		<ul style="list-style-type: none"> <li>• Schedule 15 values are not well defined.</li> <li>• Unclear how values will be determined consistently.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	Support submission 262 ref. 125		<ul style="list-style-type: none"> <li>• Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</li> <li>• Greater robustness in decision making needed.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Introduce greater flexibility in relation to the timeframes set out Schedule 15.	<ul style="list-style-type: none"> <li>• Need to avoid disproportionate costs on land managers, and to provide flexibility in time in order to give effect to the NPSFW 2030 deadline.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 263 ref. 125		<ul style="list-style-type: none"> <li>• Matters within schedules lack investigation, scientific basis &amp; are not achievable.</li> <li>• Greater robustness in decision making needed.</li> </ul>
Colin Scurr	268	Amend	Amend Schedule to reflect properly differentiated statistical models for ambient water quality.	<ul style="list-style-type: none"> <li>• Targets expressed as absolute limits. Does not reflect scientific practice for SOE monitoring.</li> <li>• Does not reflect natural variation across a river.</li> <li>• Establishes unnecessary restrictive regime.</li> <li>• Absolute targets in Schedule 15 are unlawful as does not have regard to actual or potential effects.</li> <li>• No foundation or support for target dates.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 268 ref. 125		<ul style="list-style-type: none"> <li>• Doesn't reflect natural variation across a river.</li> <li>• Amend limits and extend transition times to allow reassessment.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Needs to be more science informed decision making.</li> </ul>
Horticulture New Zealand	269	Oppose	Withdraw Schedule 15 and establish a process with the community to review the natural and human use values in the Plan and amend Schedule 15 so that the natural and human use values are supported and achievable.	<ul style="list-style-type: none"> <li>• Targets do not support human use values.</li> <li>• Descriptors in Table 15.1 overlap, are general and difficult to quantify.</li> <li>• Targets are unrealistic.</li> <li>• No robust technical analysis of numbers or cost-benefit analysis of effectiveness and efficiency.</li> <li>• No clear rationale for the 5 receiving water groups.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 269 ref. 125		<ul style="list-style-type: none"> <li>• Must be amendments to limits and transition times.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
TrustPower	1059	Support submission 269 ref. 125		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
Alliance Group Limited	1060	Support submission 269 ref. 125		<ul style="list-style-type: none"> <li>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</li> </ul>
Etrick Fruitgrowers Association Inc	1067	Support submission 269 ref. 125		<ul style="list-style-type: none"> <li>• Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.</li> </ul>
Silver Fern Farms Limited	1070	Support submission 269 ref. 125		<ul style="list-style-type: none"> <li>• Support in part in so far as the natural and human use values need to be identified and standards set accordingly.</li> </ul>
Fish and Game (Central South Island)	273	Support	Address the use of Schedule 15 in an explanation.  Clarity need to be provided on whether the standards in Schedule 15 are within the receiving bodies, or for contaminants in a discharge prior to them entering water.	<ul style="list-style-type: none"> <li>• Supportive of setting water quality standards and timeframes for achieving these.</li> <li>• Limits are ecologically sound and will improve water quality where degraded.</li> </ul>
Craiglea Limited	1012	Oppose submission 273 ref. 125		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> <li>• Affected by a variety of activities, not just agricultural uses.</li> <li>• Imposes unnecessary constraints on farming practices.</li> </ul>
Contact Energy Limited	1013	Support/Oppose in part submission 273 ref. 125		<ul style="list-style-type: none"> <li>• It should be clarified that standards in Schedule 15 are within the receiving water bodies, to provide suitable effects based criterion for management of discharges.</li> <li>• Opposes submission's other aspects: not possible to identify whether, if accepted, it would improve the plan.</li> </ul>
Otago Water Resource Users Group	1056	Oppose in part submission 273 ref. 125		<ul style="list-style-type: none"> <li>• Such measures would need to be agreed on.</li> </ul>
TrustPower	1059	Oppose submission 273 ref. 125		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
Alliance Group Limited	1060	Oppose submission 273 ref. 125		<ul style="list-style-type: none"> <li>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</li> </ul>
Silver Fern Farms Limited	1070	Oppose submission 273 ref. 125		<ul style="list-style-type: none"> <li>• Silver Fern Farms submitted against the adoption of Schedule 15 in its current form and therefore oppose submissions in support of its inclusion as it stands.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 273 ref. 125		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
T M and C M Scurr	275	Oppose	A catchment by catchment standard and limits should apply.	<ul style="list-style-type: none"> <li>Setting an Otago wide standard is not a good idea as Cardrona Valley has other characteristics.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 275 ref. 125</i>		<ul style="list-style-type: none"> <li><i>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li><i>Greater robustness in decision making needed.</i></li> </ul>
Federated Farmers of New Zealand	278	Amend	Amend limits and increase transition times. Review catchment and sub catchment classification.	<ul style="list-style-type: none"> <li>Where standards currently exceeded the timeframes should be extended to meet those of Schedule 16.</li> <li>Provide stronger links between farm discharge compliance and resulting improvements in the receiving environment.</li> <li>Important to define natural vs. modified waterways in schedule to clarify which waterways are captured under Schedule 15 and which require limits under Schedule 16.</li> <li>Approach generally supported with use of ANZECC guidelines and appropriate scientific measuring and reporting methodologies.</li> <li>Specific catchments must be accounted for.</li> <li>Receiving water standards should all be consistent with ANZECC guidelines or upland and lowland classifications. Any departure requires a full explanation.</li> <li>Nationally adopted MfE monitoring and reporting regime should be adhered to, including dissolved oxygen.</li> <li>Approach of not allowing a single variable to be noncompliant whilst meeting a "good" water quality standard is inconsistent with accepted national practice.</li> <li>Unclear how catchments that don't flow to coast or are sub-catchments will be managed.</li> <li>Minimum of 5 years to comply considered appropriate.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 125</i>		<ul style="list-style-type: none"> <li><i>Practical and workable alternatives, solutions and suggestions.</i></li> </ul>
<i>Hopfield Investments Ltd</i>	1019	<i>Support submission 278 ref. 125</i>		<ul style="list-style-type: none"> <li><i>Operation relies on natural streams for continuing viability.</i></li> <li><i>Plan change has huge impact on farming business.</i></li> <li><i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 125</i>		<ul style="list-style-type: none"> <li><i>No reason given.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 125</i>		<ul style="list-style-type: none"> <li><i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i></li> <li><i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 125</i>		<ul style="list-style-type: none"> <li><i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i></li> <li><i>Effects-based approach should allow for discharges that exceed Schedule 16 limits.</i></li> </ul>
Wenita Forest Products	279	Amend	Amend Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12.	<ul style="list-style-type: none"> <li>Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 279 ref. 125</i>		<ul style="list-style-type: none"> <li><i>Schedule 15 requires amendment.</i></li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngāherehere o Aotearoa	282	Amend	Amendment to Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12.	<ul style="list-style-type: none"> <li>Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Incorporated, Otago/Southland Section				
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 15 requires amendment.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 282 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
City Forests Limited	283	Amend	Amendment to Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12.	<ul style="list-style-type: none"> <li>• Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 15 requires amendment.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 283 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
Southern Wood Council	289	Amend	Amendment to Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12, to be informed by and aligned to the recommendations of the Land and Water Forum.	<ul style="list-style-type: none"> <li>• Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners.</li> <li>• LAWF recommends community consultation when setting limits (catchment by catchment basis).</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 289 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
Beaton Family	291	Did not specify	Seeks clarification on the following: <ul style="list-style-type: none"> <li>- Shouldn't areas of similar farming use have the same standards proposed?</li> <li>- Which of these standards must we comply with?</li> </ul>	<ul style="list-style-type: none"> <li>• The lower Taieri plains have a farming intensity compatible with areas of the Lower Clutha but have a different type of classification. The flat areas around Benhar are also designated different from the areas across the river.</li> <li>• Tables are not all in same units.</li> <li>• Unclear which standards we need to comply with.</li> </ul>
Janefield Farm	296	Amend	That Council increases the lead in times for the adoption of Schedule 15 and 16 and ensure that the standards are realistic and achievable.	<ul style="list-style-type: none"> <li>• Believe best practice won't meet requirements.</li> <li>• Far reaching effects on future viability of farming.</li> <li>• How can ORC propose change without knowing impact on sector?</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 296 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Provides science-based, workable and practical suggestions.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 296 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Must be amendments to limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Clydevale Dairy Farms Ltd	297	Oppose	Delete schedule or identify more practical and justifiable limits.	<ul style="list-style-type: none"> <li>• Targets overly restrictive; do not reflect natural variations within catchment, so does not reflect practice for SOE monitoring.</li> <li>• No reason given why standards and target dates for compliance selected.</li> </ul>
Greenfield Farming Ltd	298			
Big River Dairy Limited	299			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 297, 298 &amp; 299 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Must be amendments to limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Andrea Clarke	305	Amend	Identify the number of different catchments within the Otago region all with differing triggers.	<ul style="list-style-type: none"> <li>• Important to set realistic and appropriate limits to the geographical characteristics of Otago.</li> <li>• Understanding soil systems and nutrient movement, limits achievement of proposed levels of contaminants within timeframe.</li> <li>• Appropriate for ORC to identify the different contaminants that result in decreasing water quality.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Specific limits will maintain existing quality where good or reasonable and help improve where quality poor.</li> <li>• Potential difficulty in identifying individual land use activities that exceed limits - need tools.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 305 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Must be amendments to limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Central Otago District Council & Clutha District Council	309	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Approach does not reflect scientific practice.</li> <li>• Does not reflect natural variation and establishes regime more restrictive than necessary.</li> <li>• Targets in Schedule 15 are unlawful.</li> <li>• Target dates or compliance have no support in objectives or policies.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Agree schedules 15 and 16 need to be based on environmental effects and science.</i></li> <li>• <i>Agree objective and policy framework do not support inclusion of the scheduled limits.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and extend transition times to allow reassessment.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 309 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Reasons set out in Trustpower's submission.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 309 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i></li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i></li> </ul>
Glen Dene Limited	310	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Approach does not reflect scientific practice.</li> <li>• Does not reflect natural variation and establishes regime more restrictive than necessary.</li> <li>• Targets in Schedule 15 are unlawful.</li> <li>• Target dates or compliance have no support in objectives or policies.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 310 ref. 125</i>		<ul style="list-style-type: none"> <li>• <i>Doesn't reflect natural variation across a river.</i></li> <li>• <i>Amend limits and extend transition times to allow reassessment.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Ben Graham	311	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> <li>• Approach does not reflect scientific practice.</li> <li>• Does not reflect natural variation and establishes regime more restrictive than necessary.</li> <li>• Targets in Schedule 15 are unlawful.</li> <li>• Target dates or compliance have no support in objectives or policies.</li> </ul>
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew	315			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Family Trust & Partnership				
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	Support submissions 311 - 326 ref. 125		<ul style="list-style-type: none"> <li>Doesn't reflect natural variation across a river.</li> <li>Amend limits and extend transition times to allow reassessment.</li> <li>Must be stronger links between discharge compliance and environmental improvements.</li> <li>Needs to be more science informed decision making.</li> </ul>
<i>Glenshee Station Limited</i>	1062	Support in part submission 326 ref. 125		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>
Alastair Cocks	334	Amend	Any standards set must be fair and achievable.	<ul style="list-style-type: none"> <li>Some standards unable to be met, in part due to natural turbidity of waterways within property.</li> <li>Support the maintenance of the environment and clean waterways, and our farming practices aim to achieve that.</li> <li>Proposed changes could severely compromise ability to farm unless the right balance is achieved.</li> <li>Short notice (received flyer in mail the day submissions were due) and pressure of seasonal work obstacle to preparing a submission.</li> <li>Need more time to gather information on impact of proposed levels for various nutrients.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 334 ref. 125		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments.</li> <li>Standards must be achievable.</li> <li>Needs amendment to limits and increase in transition times.</li> </ul>

### 126 Table 15.1 - Characteristics of good quality water

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Michael Rawlinson	121	Support	Maintain descriptions (in particular sediment and bank).	<ul style="list-style-type: none"> <li>These are vitally important characteristics of a healthy waterway.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	Oppose submission 121 ref. 126		<ul style="list-style-type: none"> <li>Whilst ORC has to set limits under the NPSFW, they must be clearly defined and achievable. The proposed Characteristic descriptions in Table 15.1 are subjective and as such Silver Fern Farms submitted that the table is withdrawn and further amended. Silver Fern Farms opposes support for the retention of Table 15.1 in its proposed form.</li> </ul>
Dairy NZ Limited	146	Oppose	Withdraw this table.	<ul style="list-style-type: none"> <li>Replaced with clear narrative and numerical standards.</li> <li>Need to develop with input from Otago community.</li> </ul>
<i>Forest and Bird NZ</i>	1007	Oppose submission 146		<ul style="list-style-type: none"> <li>Opposes withdrawing table.</li> <li>Supports amendments to table to provide standards for lakes, wetlands and</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 126</i>		<i>aquifers.</i>
<i>Waitaki Irrigators Collective Limited</i>	<i>1031</i>	<i>Support submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• More thorough collaboration with the community should be undertaken than occurred in the development of the proposed Plan Change.</li> <li>• Objectives and values should be set at sub-regional level and supported by technical and scientific analysis.</li> </ul>
<i>Environmental Defence Society</i>	<i>1055</i>	<i>Oppose submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• Opposes withdrawing table.</li> <li>• Supports measures to further define "good water quality".</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• Measures proposed lack investigation, scientific basis &amp; are not achievable.</li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</li> </ul>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• Silver Fern Farms submitted that Table 15.1 was subjective and not clearly defined. Silver Fern Farms supports the intent of these submissions in terms of withdrawing and replacing the table with clearly defined technically sound standards.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose in part submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 146 ref. 126</i>		<ul style="list-style-type: none"> <li>• Provision should be made in transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge limits.</li> </ul>
<i>Pioneer Generation</i>	<i>147</i>	<i>Amend</i>	<i>That the term 'good quality water' be deleted.</i>	<ul style="list-style-type: none"> <li>• Overly simplistic and unlikely to be useful.</li> <li>• Open to divergent interpretations.</li> </ul>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support submission 147 ref. 126</i>		<ul style="list-style-type: none"> <li>• Reasons stated in the submission.</li> </ul>
<i>Alliance Group Limited</i>	<i>187</i>	<i>Oppose</i>	<i>That it is removed from Plan Change.</i>	<ul style="list-style-type: none"> <li>• Not most appropriate way to achieve purpose of RMA.</li> <li>• Impractical and arbitrary.</li> <li>• No consideration given to temporal variability, exceptions.</li> <li>• No assessment provided of how characteristics or exceptions derived.</li> <li>• If a catchment does not achieve its targets, it doesn't mean that a discharge would have adverse effects on the water body.</li> <li>• Application should be able to be made on a case-by-case basis.</li> </ul>
<i>Meridian Energy Limited</i>	<i>1014</i>	<i>Support submission 187 ref. 126</i>		<ul style="list-style-type: none"> <li>• Table 15.1 should be removed as characteristics defining "good quality water" are arbitrary and impractical.</li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 187 ref. 126</i>		<ul style="list-style-type: none"> <li>• Agrees Schedule 15 is impractical, arbitrary and could prevent granting of discharge consents regardless of extent.</li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	<i>Support submission 187 ref. 126</i>		<ul style="list-style-type: none"><li>• Reasons set out in Trustpower's submission.</li></ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 187 ref. 126</i>		<ul style="list-style-type: none"><li>• Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</li></ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 187 ref. 126</i>		<ul style="list-style-type: none"><li>• Silver Fern Farms submitted that Table 15.1 was subjective and not clearly defined. Silver Fern Farms supports the intent of these submissions in terms of withdrawing and replacing the table with clearly defined technically sound standards.</li></ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	197	<i>Support</i>	Table 15.1 be retained as currently drafted.	<ul style="list-style-type: none"><li>• Supports table.</li></ul>
<i>Meridian Energy Limited</i>	1014	<i>Oppose submission 197 ref. 126</i>		<ul style="list-style-type: none"><li>• Table 15.1 in its current form set arbitrary and idealistic characteristics.</li><li>• Under current Table 15.1, no further discharges may be able to occur in many catchments.</li></ul>
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 126</i>		<ul style="list-style-type: none"><li>• Reasons set out in Trustpower's submission.</li></ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 126</i>		<ul style="list-style-type: none"><li>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li></ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 197 ref. 126</i>		<ul style="list-style-type: none"><li>• Whilst ORC has to set limits under the NPSFW, they must be clearly defined and achievable. The proposed Characteristic descriptions in Table 15.1 are subjective and as such Silver Fern Farms submitted that the table is withdrawn and further amended. Silver Fern Farms opposes support for the retention of Table 15.1 in its proposed form.</li></ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 126</i>		<ul style="list-style-type: none"><li>• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</li></ul>
<i>Irrigation New Zealand Incorporated</i>	202	<i>Oppose</i>	Withdraw. Table 15.1 need be rewritten so as it clearly separates the narrative and numerical objectives. This should be done in collaboration with stakeholders throughout Otago and also with better understanding of the benefits to and consequences upon individual communities for each.	<ul style="list-style-type: none"><li>• No reason given.</li></ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 202 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Support the need for greater collaboration with stakeholders.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 202 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Matters within tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</i></li> </ul>
NZ Transport Agency	203	Amend	Clarify the intent of Table 15.1 and resolve uncertainty in the definition of some characteristics.	<ul style="list-style-type: none"> <li>• Unclear if needs to be complied with as well as the Table 15.2 and, if so, by what date.</li> <li>• Exemptions/qualifications contained in colour, sediment and smell make application very uncertain.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Matters within tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
Trustpower Limited	206	Oppose	Seeks that Table 15.1 is deleted/removed from the Plan Change.	<ul style="list-style-type: none"> <li>• 'Good quality water' characteristics are arbitrary</li> <li>• They do not provide for natural variability in colour, turbidity and siltiness.</li> <li>• Odour difficult to assess, may come from surrounding land.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Reasons stated in the submission.</i></li> </ul>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Provisions arbitrary and difficult to assess.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 206 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Measures arbitrary, don't account for natural turbidity and colour variations.</i></li> <li>• <i>Uncertainty as to how targets established and can be realistically achieved.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 206 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support submission 206 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Table figures are arbitrary and not appropriate for across region use.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 206 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i></li> </ul>
Dunedin City Council	211	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>• Unclear whether Table 15.1 characteristics are supposed to be complied with and by what date.</li> <li>• Exemptions/qualifications for colour, sediment, smell, make application very uncertain.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 15 requires review.</i></li> <li>• <i>Section 32 analysis was inadequate.</i></li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers</i>	1054			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Association</i>				
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 126</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>• Greater flexibility should be introduced (particularly in relation to the timeframes).</li> </ul>
Fulton Hogan Limited	222	Amend	Change the Schedule to have each description of the water quality characteristics complemented by numerical standards.	<ul style="list-style-type: none"> <li>• Narrative statements are uncertain and subject to a range of interpretations.</li> </ul>
Holcim (New Zealand) Limited	224			
Central Otago Environmental Society Inc	233	Amend	Add clear, unequivocal statements identifying the base standards for quality water from the perspectives of health, recreation and ecological values.	<ul style="list-style-type: none"> <li>• Agriculture, horticulture, forestry, construction and infrastructure necessary activities.</li> <li>• Discharges that degrade water quality threaten public rights and interests.</li> <li>• Acceptable balance between less than perfect water standard, and that which is not acceptable by way of pollution.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 233 ref. 126</i>		<ul style="list-style-type: none"> <li>• The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</li> <li>• Agrees that a greater clarity would assist.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 233 ref. 126</i>		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 233 ref. 126</i>		<ul style="list-style-type: none"> <li>• Submission requests stricter controls on agricultural activities without recognising social and economic effects such controls would have on farmers already potentially burdened with considerable compliance costs.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 233 ref. 126</i>		<ul style="list-style-type: none"> <li>• Plan should adopt an effects-based approach to managing rural discharges.</li> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Silver Fern Farms Limited	238	Oppose	The standards/targets set out in the Schedule (along with the wider plan change) need to be withdrawn until these matters can be worked through in a collaborative manner.	<ul style="list-style-type: none"> <li>• Table 15.1 simplistic and unlikely to be useful.</li> <li>• Good water quality not well defined.</li> <li>• Water being "colour free" unachievable.</li> <li>• Little technical support.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 238 ref. 126</i>		<ul style="list-style-type: none"> <li>• Matters within tables lack investigation, scientific basis &amp; are not achievable.</li> <li>• Greater robustness in decision making needed.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 238 ref. 126</i>		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 238 ref. 126</i>		<ul style="list-style-type: none"> <li>• Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</li> </ul>
Fonterra Co-operative Group Limited	241	Oppose	Withdraw this table.	<ul style="list-style-type: none"> <li>• Replaced with clear narrative and numerical standards.</li> <li>• Need to develop with input from Otago community.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 241 ref. 126</i>		<ul style="list-style-type: none"> <li>• Withdrawal would scupper the Plan Change.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 241 ref. 126</i>		<ul style="list-style-type: none"> <li>• Reasons stated in the submission.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 126</i>		<ul style="list-style-type: none"> <li>• Matters within tables lack investigation, scientific basis &amp; are not achievable.</li> <li>• Greater robustness in decision making needed.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 241</i>		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 126</i>		
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 241 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i></li> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> <li>• Criteria are overly simple, unlikely to be useful and need further consideration.</li> <li>• Many rivers unlikely to achieve some characteristics even in their natural state.</li> <li>• Statement 'water is colour-free' is incorrect.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 15 values are not well defined.</i></li> <li>• <i>Unclear how values will be determined consistently.</i></li> <li>• <i>Imposed limits should be supported by science and technical data.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Meridian Energy Limited	251	Oppose	Opposes the characteristics that seek: "Water is clear"; "water is colour-free"; and "riffles and runs free of obvious mud and silt deposits".	<ul style="list-style-type: none"> <li>• Characteristics are arbitrary and idealistic. Do not provide for natural spatial and temporal variability.</li> <li>• Not conceivable for all water bodies to achieve these characteristics.</li> <li>• Characteristics may infer that no further discharges are able to occur in many catchments.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 251 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Reasons stated in the submission.</i></li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 251 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>For reasons given by submitter.</i></li> <li>• <i>The characteristics are arbitrary and idealistic.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 251 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Silver Fern Farms also submitted that it is unreasonable and unachievable to have characteristics such as colourfree and clear water and therefore supports the submissions to amend/delete these characteristics.</i></li> </ul>
New Zealand Fertiliser	252	Oppose	Supports in principle the intent of Schedule 15 to define 'good water	<ul style="list-style-type: none"> <li>• Criteria are overly simple, unlikely to be useful and need further consideration.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Manufacturers Research Association Inc			quality', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> <li>Many rivers will be unlikely to achieve this even in their natural state.</li> <li>Statement 'water is colour-free' is incorrect.</li> </ul>
Ballance Agri-Nutrients Ltd	262			
Mr RJ Borst	1034	Support submissions 252 and 262 ref. 126		<ul style="list-style-type: none"> <li>Schedule 15 values are not well defined.</li> <li>Unclear how values will be determined consistently.</li> <li>Imposed limits should be supported by science and technical data.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support submissions 252 and 262 ref. 126		<ul style="list-style-type: none"> <li>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</li> <li>Greater robustness in decision making needed.</li> </ul>
Silver Fern Farms Limited	1070	Support submission 262 ref. 126		<ul style="list-style-type: none"> <li>Silver Fern Farms also submitted that it is unreasonable and unachievable to have characteristics such as colourfree and clear water and therefore supports the submissions to amend/delete these characteristics.</li> </ul>
Environmental Defence Society	267	Amend	Amend Table 15.1 so that the characteristics of good quality water are also defined in quantitative terms as far as possible.	<ul style="list-style-type: none"> <li>"Good water quality" should be specific and measurable as possible so people aware what standard is to be attained.</li> <li>Using everyday language is useful. However needs to translate to scientific measurements to reduce ambiguity.</li> </ul>
The Director-General of Conservation	1011	Support submission 267 ref. 126		<ul style="list-style-type: none"> <li>Provides clarity.</li> </ul>
Contact Energy Limited	1013	Oppose submission 267 ref. 126		<ul style="list-style-type: none"> <li>The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</li> <li>Agrees that a greater clarity would assist.</li> </ul>
Horticulture New Zealand	1032	Oppose submission 267 ref. 126		<ul style="list-style-type: none"> <li>Need to take into account variations across the region.</li> </ul>
Mr RJ Borst	1034	Support in part submission 267 ref. 126		<ul style="list-style-type: none"> <li>Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport	1038			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	<i>Oppose submission 267 ref. 126</i>		<i>• Reasons set out in Trustpower's submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 126</i>		<i>• Oppose submission in that it supports plan change and use of prohibited activity status.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 267 ref. 126</i>		<i>• Clarification required to references of "good quality water" and "natural and human use values", particularly that this includes farming and related rural activities.</i>
Marc Schallenberg	270	Amend	If this table is supposed to reflect characteristics of lakes (not just rivers), it should include characteristics of good water quality related to lakes as well. Divide the table into sections specifically listing characteristics for rivers, lakes, wetlands, and aquifers. For lakes and rivers, the absence of algal and cyanobacterial blooms (i.e. > 10 ug/L chla) is a characteristic which should be included. For the lay person, this could be stated as "the water does not have a murky green, brown or red colour". I also suggest including: "The absence of nuisance proliferations of aquatic plants, algae (planktonic or benthic), scums, slimes, or algae blanketing the bed."	<i>• Table 15.1 does not cover all key characteristics.</i>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 270 ref. 126</i>		<i>• Table 15.1 should include characteristics for lakes, wetlands and aquifers as well as rivers.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 270 ref. 126</i>		<i>• Overly restrictive and disproportionate. • Does not take into account economic considerations.</i>
Forest and Bird	271	Amend	Ensure Schedule 15.1 is adequately incorporated as a standard into all relevant rules. Define over what length of bed 30% refers to for the extent of coverage by algae. Define vegetation cover as; Vegetation cover provides buffer from adjoining land uses, and discharges.	<i>• Supports schedule, which should be part of permitted activity status for all rules. • Not clear what area of bed 30% coverage refers to for algae coverage. • The term "Vegetation is not stripped bare" does not describe a healthy margin.</i>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 271</i>		<i>• Provides clarity.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 126</i>		
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose submission 271 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</i></li> </ul>
<i>Meridian Energy Limited</i>	<i>1014</i>	<i>Oppose submission 271 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Relationship between Rules and Schedules should be clarified.</i></li> <li>• <i>However, inappropriate to use Table 15.1 as a standard to assess all rules and in particular permitted activity rules.</i></li> </ul>
<i>Central Otago Environmental Society</i>	<i>1028</i>	<i>Support submission 271 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Better definition required, with quantitative and qualitative values for "good quality" water.</i></li> <li>• <i>Distinction between parts of individual catchments needed.</i></li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 271 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>			
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>TrustPower</i>	<i>1059</i>	<i>Oppose submission 271 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Reasons set out in Trustpower's submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 271 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose submission 271 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
<i>Fish and Game (Central South Island)</i>	<i>273</i>	<i>Amend</i>	<p>Include the following measures:</p> <ul style="list-style-type: none"> <li>- The Macroinvertebrate Community Index (MCI)</li> <li>- Temperature</li> <li>- Periphyton growth</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Qualitative definitions hard to understand and enforce.</i></li> <li>• <i>"Vegetation is functioning and healthy" may be better measure than "vegetation is not stripped bare".</i></li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	<i>1010</i>	<i>Oppose submission 273 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Additional measures (MCI; Temperature, Periphyton growth) to Table 15.1 adds unnecessary complexity to the definition.</i></li> <li>• <i>Matters already provided for in the SOE Reporting.</i></li> </ul>
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		submission 273 ref. 126		<ul style="list-style-type: none"> <li>Affected by a variety of activities, not just agricultural uses.</li> <li>Imposes unnecessary constraints on farming practices.</li> </ul>
Horticulture New Zealand	1032	Oppose submission 273 ref. 126		<ul style="list-style-type: none"> <li>Addition of numerical standards would need to be subject to a plan change and public submission.</li> </ul>
Mr RJ Borst	1034	Oppose submission 273 ref. 126		<ul style="list-style-type: none"> <li>Not all waterways should have a high standard of water quality.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
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Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Otago Water Resource Users Group	1056	Oppose in part submission 273 ref. 126		<ul style="list-style-type: none"> <li>Such measures would need to be agreed on.</li> </ul>
TrustPower	1059	Oppose submission 273 ref. 126		<ul style="list-style-type: none"> <li>Reasons set out in Trustpower's submission.</li> </ul>
Silver Fern Farms Limited	1070	Oppose submission 273 ref. 126		<ul style="list-style-type: none"> <li>Whilst ORC has to set limits under the NPSFW, they must be clearly defined and achievable. The proposed Characteristic descriptions in Table 15.1 are subjective and as such Silver Fern Farms submitted that the table is withdrawn and further amended. Silver Fern Farms opposes support for the retention of Table 15.1 in its proposed form.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 273 ref. 126		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Contact Energy Limited	284	Amend	Amend Table 15.1 to provide explicitly that water is or remains of 'good quality' if it does not/ceases to have a defined characteristic: <ul style="list-style-type: none"> <li>(i) By reason of its natural characteristics; or</li> <li>(ii) By reason of water flows and/or levels in the catchment being above the mean; or</li> <li>(iii) If the alternative water quality only occurs for short periods (less than one week); or</li> <li>(iv) As a result of necessary bed disturbance works.</li> </ul>	<ul style="list-style-type: none"> <li>Same standards apply to most Otago water bodies.</li> <li>No clear statement on how to apply objective for water with naturally elevated sediment, or during abnormal flows.</li> <li>May be desired to reduce water quality for short periods for other objectives, e.g., working to mitigate flood risk.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
New Zealand Wind Energy Association	1030	Support in part submission 284 ref. 126		<ul style="list-style-type: none"> <li>Table 15.1 too uncertain.</li> <li>May be desirable to reduce water quality for short periods, e.g. working to mitigate flood risk.</li> <li>It could also be appropriate to reduce water quality for short periods if that reduction forms part of a renewable electricity generation activity.</li> </ul>
Fish and Game (Otago)	287	Amend	<p>Wishes to see the characteristics include the following measures:</p> <p>(a) The Macroinvertebrate Community Index (MCI).  (b) Temperature  (c) Periphyton growth</p> <p>"Vegetation is functioning and healthy" may be a better measure [than "stripped bare"].</p>	<ul style="list-style-type: none"> <li>Qualitative definitions hard to understand and enforce.</li> <li>Riparian vegetation is damaged well before being stripped bare.</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)	1010	Oppose submission 287 ref. 126		<ul style="list-style-type: none"> <li>Additional measures (MCI; Temperature, Periphyton growth) to Table 15.1 adds unnecessary complexity to the definition.</li> <li>Matters already provided for in the SOE Reporting.</li> </ul>
Craiglea Limited	1012	Oppose submission 287 ref. 126		<ul style="list-style-type: none"> <li>Not all waterways should have a high standard of water quality.</li> <li>Affected by a variety of activities, not just agricultural uses.</li> <li>Imposes unnecessary constraints on farming practices.</li> </ul>
Contact Energy Limited	1013	Oppose submission 287 ref. 126		<ul style="list-style-type: none"> <li>Not possible to identify submission's effect in the absence of suggested quantitative values.</li> <li>A criterion focusing on whether vegetation is functioning and healthy assumes riparian margins were previously naturally vegetated.</li> </ul>
Mr RJ Borst	1034	Oppose submission 287 ref. 126		<ul style="list-style-type: none"> <li>Not all waterways should have a high standard of water quality.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
TrustPower	1059			
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms	1074	Oppose submission 287		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Partnership</i>		<i>ref. 126</i>		
The Director-General of Conservation	306	Amend	That Table 15.1 be amended as follows, or to like effect: Healthy riparian margins: Vegetation functions as an effective buffer of adjoining land use and provides habitat.  Characteristic: Biological activity Description: Macroinvertebrate activity, measured through the Macroinvertebrate Community Index (MCI). A high MCI score is indicative of a healthy and functioning ecosystem.	<ul style="list-style-type: none"> <li>• A riparian margin with a stubble of vegetation should not be classed as healthy.</li> <li>• Biological activity is characteristic of good water quality.</li> </ul>
<i>Forest and Bird NZ</i>	<i>1007</i>	<i>Support submission 306 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Adding MCI index will add to ability to identify water quality that provides healthy ecosystems.</i></li> </ul>
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose submission 306 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>No evidence from environmental impacts from agricultural activities.</i></li> <li>• <i>Changes are vague, unclear and open-ended.</i></li> <li>• <i>No need on further restrictions on discharges.</i></li> <li>• <i>Requires and enormous number of staff to monitor.</i></li> </ul>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Oppose submission 306 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Relief sought assumes riparian margins were previously naturally vegetated.</i></li> <li>• <i>Opposes the use of the MCI index as low MCI scores are not necessarily related to contaminant levels e.g. low MCI scores are common in rivers downstream of storage dams with controlled releases of water.</i></li> </ul>
<i>Hopfield Investments Ltd</i>	<i>1019</i>	<i>Oppose submission 306 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Would impact on farming operation.</i></li> <li>• <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li>• <i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Oppose submission 306 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 126</i>		<ul style="list-style-type: none"> <li>• <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>	<i>Oppose submission 306</i>		<ul style="list-style-type: none"> <li>• <i>Very wide changes sought without evidence of environmental impact, including land management practice.</i></li> </ul>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Moutere Station Limited</i>	<i>1052</i>			
<i>Hawkdun Station</i>	<i>1053</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 126		<ul style="list-style-type: none"> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 126		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
TrustPower	1059	Oppose submission 306 ref. 126		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 126		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 126		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 126		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>

### 127 Table 15.2 - Receiving water standards

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Andrew McCurdy	6	Amend	Splitting Pomahaka River catchment into Area 2 and Area 4 to reflect different river and catchment characteristics over the rivers length.	<ul style="list-style-type: none"> <li>• Recognise catchment value of this very important waterway.</li> </ul>
The Director-General of Conservation	1011	Support submission 6 ref. 127		<ul style="list-style-type: none"> <li>• Provides clarity.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 6 ref. 127		<ul style="list-style-type: none"> <li>• Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>• Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>• Does take into account local environmental conditions and economic/development consideration.</li> </ul>
Hewett Farm Ltd	39	Did not specify	To understand what the minimum acceptable levels will be that balance economic considerations, and what these implications are for land owners, over what time frame for implementation.	<ul style="list-style-type: none"> <li>• Not satisfied with explanation of why targets have been set at the levels they have.</li> <li>• Will levels maintain water quality at acceptable economic cost?</li> </ul>
Green Party (Dunedin Branch)	62	Amend	Would recommend a 2 year period [transition time].	<ul style="list-style-type: none"> <li>• Five years is too long.</li> </ul>
New Zealand Fertiliser	1010	Oppose		<ul style="list-style-type: none"> <li>• Request is inappropriate and unreasonable and would place unnecessary</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Manufacturers Research Association Inc (Fert Research)		submission 62 ref. 127		costs on resource users.
Craiglea Limited	1012	Oppose submission 62 ref. 127		• A two-year transition period is too short.
Mr RJ Borst	1034			
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Otago Water Resource Users Group	1056	Oppose submission 62 ref. 127		• Unreasonably short timeframe.
Federated Farmers of New Zealand	1057	Oppose submission 62 ref. 127		• Reduction in lead in times unworkable and not achievable.
Fonterra Co-operative Group Limited	1068	Oppose submission 62 ref. 127		• Discharge standards questionable as to attainability, if retained an equitable timeframe to attempt to attain them will be required.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 62 ref. 127		<ul style="list-style-type: none"> <li>• Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>• Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>• Does take into account local environmental conditions and economic/development consideration.</li> <li>• Disproportionate and overly restrictive.</li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Did not specify	No decision requested.	• Region wide standards and limits - regional or local conditions vary, so common sense has to be balancing factor.
Mt Aspiring Station	127	Amend	<p>Delay the date of notification in line with the timeframes suggested by Federated Farmers in order to allow for the following:</p> <ul style="list-style-type: none"> <li>- Further research on smaller tributaries rather than relying on extrapolation from main stem rivers.</li> <li>- More testing to understand seasonal and "point of testing" variation to build a better picture of what realistic targets are.</li> </ul>	<ul style="list-style-type: none"> <li>• Measures pushed through without appropriate investigation/discussion.</li> <li>• Despite very good water quality, only 12 to 80% of the sites in Wanaka lakes within target levels for different tests, standards set too low.</li> <li>• More investigation required to get appropriate standards.</li> <li>• Setting standards too low deters farmers from trying to meet them.</li> <li>• Creates distrust towards ORC, tarnishes future efforts to establish more</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			- Further consultation between the ORC and stakeholder groups. - Allow individual land managers to adjust their management practices to the targets.  Amend the Matukituki River to be exempt from turbidity measures until further research can be carried out to determine whether the Turbidity results tested were due to natural factors or human controlled factors.	realistic targets. • Matukituki catchment has significantly high natural sediment levels.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 127 ref. 127</i>		• <i>Measures proposed lack investigation, scientific basis &amp; are not achievable.</i> • <i>E.g. Matukituki catchment has high natural sediment levels making achieving limits more difficult.</i>
Dairy NZ Limited	146	Oppose	Withdraw this table.	• Complementary analysis needed to determine appropriate standards. • Technical report needed to provide evidence for foundation of rules. • Withdraw until worked collaboratively with community.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 146 ref. 127</i>		• <i>Opposes withdrawing table.</i> • <i>Supports amendments to include TN &amp; TP and setting thresholds that represent the target 95% percentile set at ANZECC guidelines, or better.</i>
<i>Braemorn Farm Ltd</i>	1009	<i>Support submission 146 ref. 127</i>		• <i>Better technical analysis is needed.</i>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 146 ref. 127</i>		• <i>Withdrawal could scupper the Plan Change.</i>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 146 ref. 127</i>		• <i>More thorough collaboration with the community should be undertaken than occurred in the development of the proposed Plan Change.</i> • <i>Objectives and values should be set at sub-regional level and supported by technical and scientific analysis.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 127</i>		• <i>Measures proposed lack investigation, scientific basis &amp; are not achievable.</i>
<i>TrustPower</i>	1059	<i>Support submission 146 ref. 127</i>		<i>Reasons set out in Trustpower's submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 127</i>		• <i>Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 146 ref. 127</i>		• <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 146 ref. 127</i>		• <i>Silver Fern Farms supports the intent of the submission in terms of withdrawing and replacing Table 15.2 with clearly defined, technically sound standards agreed with the community.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 127</i>		• <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 127</i>		• <i>Provision should be made in transitional provisions for resource consents for existing discharges, even where those do not meet the proposed discharge limits.</i>
Alliance Group Limited	187	Oppose	Table 15.2 should be removed from the plan change.	• If catchment breaches Table 15.2, this policy will impede granting of consents for discharges regardless of the extent of effects of the discharge.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Consent applicant may be required to assess compliance with Table 15.2 - arduous, costly, extensive, inefficient.</li> <li>Monitoring and enforcement a strain on Council resources.</li> <li>Onus may be on consent holders to achieve catchment targets, unfair burden.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support in part submission 187 ref. 127</i>		<ul style="list-style-type: none"> <li><i>Recognises ORC has to set water quality limits and the date by which limits have to be met, under the NPS.</i></li> <li><i>Concerned with the approach undertaken to populate Table 15.2.</i></li> <li><i>Lack of a Section 32 analysis to justify proposed limits.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 127</i>		<ul style="list-style-type: none"> <li><i>Agrees Schedule 15 is impractical, arbitrary and could prevent granting of discharge consents regardless of extent.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	<i>Support submission 187 ref. 127</i>		<ul style="list-style-type: none"> <li><i>Reasons set out in Trustpower's submission.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 187 ref. 127</i>		<ul style="list-style-type: none"> <li><i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 187 ref. 127</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms supports the intent of the submission in terms of withdrawing and replacing Table 15.2 with clearly defined, technically sound standards agreed with the community.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	197	<i>Amend</i>	<p>That Table 15.2 be retained, but that the values set out should be maximum values rather than averages.</p> <p>AND</p> <p>That Table 15.2 sets out where, physically, these values are to be monitored.</p>	<ul style="list-style-type: none"> <li>Values in Table 15.2 won't achieve outcomes in Table 15.1.</li> <li>Implementation concerns, monitoring at current ORC sites, or where waterway leaves property, or everywhere discharges may enter water (numerous and impossible to achieve)?</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 197</i>		<ul style="list-style-type: none"> <li><i>Provides clarity.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 127</i>		
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose in part submission 197 ref. 127</i>		<ul style="list-style-type: none"> <li>• Limits and transition times unachievable.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 127</i>		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 197 ref. 127</i>		<ul style="list-style-type: none"> <li>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 127</i>		<ul style="list-style-type: none"> <li>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 127</i>		<ul style="list-style-type: none"> <li>• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</li> </ul>
<i>Irrigation New Zealand Incorporated</i>	202	<i>Oppose</i>	Withdraw. Table 15.2 need be reviewed in collaboration with stakeholders.	<ul style="list-style-type: none"> <li>• Unable to locate technical reports that support standards and transition times.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 202 ref. 127</i>		<ul style="list-style-type: none"> <li>• Need for greater collaboration with stakeholders.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 202 ref. 127</i>		<ul style="list-style-type: none"> <li>• Matters within tables lack investigation, scientific basis &amp; are not achievable.</li> <li>• Greater robustness in decision making needed.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 202 ref. 127</i>		<ul style="list-style-type: none"> <li>• Reasons set out in Trustpower's submission.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 202 ref. 127</i>		<ul style="list-style-type: none"> <li>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 127</i>		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</li> </ul>
<i>Trustpower Limited</i>	206	<i>Oppose</i>	Remove Table 15.2 from the plan change, or amend it to identify the concerns identified by TrustPower.	<ul style="list-style-type: none"> <li>• No certainty as to how targets were established.</li> <li>• No certainty as to how targets can be achieved.</li> <li>• Supplementary information should be provided assessing compliance with standards, to assist in determining if achievable.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 127</i>		<ul style="list-style-type: none"> <li>• Reasons stated in the submission.</li> </ul>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 127</i>		<ul style="list-style-type: none"> <li>• Lack of certainty associated with provisions.</li> <li>• Supplementary information should be provided.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 206 ref. 127</i>		<ul style="list-style-type: none"> <li>• Measures arbitrary, don't account for natural turbidity and colour variations.</li> <li>• Uncertainty as to how targets established and can be realistically achieved.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 206 ref. 127</i>		<ul style="list-style-type: none"> <li>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</li> </ul>
<i>Te Runanga o Ngai Tahu,</i>	1065	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• Support a reduction in the discharge of contaminants and nutrients directly or</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>		<i>submission 206 ref. 127</i>		<i>indirectly to water.</i>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support submission 206 ref. 127</i>		<i>• Table figures are arbitrary and not appropriate for across region use.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 206 ref. 127</i>		<i>• Clarification required to references of 'good quality water' and 'natural and human use values'.</i>
Fulton Hogan Limited	222	Oppose	Withdraw this table.	<i>• No technical information has been cited that compares proposed standards with appropriate water quality guidelines, or provides comparison of standards against the status quo, or whether gap between them can be bridged by applying these standards.</i>
Holcim (New Zealand) Limited	224			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 222 and 224 ref. 127</i>		<i>• Limits and transition times unachievable. • Must be stronger links between discharge compliance and environmental improvements. • Needs to be more science informed decision making.</i>
<i>TrustPower</i>	1059	<i>Support submissions 222 and 224 ref. 127</i>		<i>• Reasons set out in Trustpower's submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submissions 222 and 224 ref. 127</i>		<i>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i>
Central Otago Environmental Society Inc	233	Amend	Timeframes to meet specified measures - add intermediate compliance objectives.  Further define catchments, taking account of variations in water quality between lower and upper reaches and the possibility that higher standards may be required for as yet unpolluted catchments.	<i>• Without immediate pressure there will be procrastination. • ORC needs to be seen moving quickly. • Blanket classification of catchments (Areas 1-5) overlooks differences. • Risks unintended degradation.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 233 ref. 127</i>		<i>• Reasons set out in Trustpower's submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 233 ref. 127</i>		<i>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 233 ref. 127</i>		<i>• Submission requests stricter controls on agricultural activities without recognising social and economic effects such controls would have on farmers already potentially burdened with considerable compliance costs.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 233 ref. 127</i>		<i>• Plan should adopt an effects-based approach to managing rural discharges. • Overly restrictive and disproportionate. • Does not take into account economic considerations.</i>
Silver Fern Farms Limited	238	Oppose	That the implementation and enforcement of new standards is delayed until after the submission/hearing process.	<i>• Timeframes are effective immediately. • Questions the appropriateness of such high standards. • Need to reflect actual state of what people expect.</i>
<i>TrustPower</i>	1059	<i>Support submission 238 ref. 127</i>		<i>• Reasons set out in Trustpower's submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 238 ref. 127</i>		<i>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i>
<i>Te Runanga o Ngai Tahu,</i>	1065	<i>Oppose</i>		<i>• Support a reduction in the discharge of contaminants and nutrients directly or</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>		<i>submission 238 ref. 127</i>		<i>indirectly to water.</i>
Fonterra Co-operative Group Limited	241	Oppose	Withdraw this table.	<ul style="list-style-type: none"> <li>• Complementary analysis needed to determine appropriate standards.</li> <li>• Technical report needed to provide evidence for foundation of rules.</li> <li>• Withdraw until worked collaboratively with community.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 241 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Matters within tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 241 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Reasons set out in Trustpower's submission.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose submission 241 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 241 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i></li> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
Meridian Energy Limited	251	Oppose	Opposes Table 15.2.	<ul style="list-style-type: none"> <li>• Concerned compliance with schedule would require detailed catchment-wide assessment of water quality which would be arduous and potentially costly process.</li> <li>• Inefficient to require such a process.</li> <li>• For reasons given by the submitter.</li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support submission 251 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Matters within tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 251 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Reasons set out in Trustpower's submission.</i></li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 251 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i></li> </ul>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 251 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i></li> </ul>
John Lee & Dennis Pezaro	254	Did not specify	It is disingenuous for ORC to give deadline dates for some waterways to achieve ORC's acceptable standard for good quality water.	<ul style="list-style-type: none"> <li>• Particular waterways already meet ORC's standards.</li> <li>• Different groupings a reflection that ORC accepts a higher level of pollution in some rivers.</li> <li>• No mention that this appears to confirm appropriate and environmentally sensitive farming practices by members of the Cardrona Landcare group.</li> <li>• Evidenced by Cardrona River.</li> </ul>
Environmental Defence Society	267	Amend	Amend the table to give effect to the other points made in this submission.	<ul style="list-style-type: none"> <li>• As stated for related submission points.</li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support in part submission 267 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			



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<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	<i>Oppose submission 267 ref. 127</i>		<i>• Reasons set out in Trustpower's submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 267 ref. 127</i>		<i>• Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 127</i>		<i>• Oppose submission in that it supports plan change and use of prohibited activity status.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support submission 267 ref. 127</i>		<i>• Clarification required to references of "good quality water" and "natural and human use values", particularly that this includes farming and related rural activities.</i>
<i>Marc Schallenberg</i>	270	<i>Amend</i>	<i>Add total N and total P to these tables.  Suggest that the thresholds in these tables should represent the target 95th percentile of the annual distribution of the values from each river/lake and this 95th percentile should be set as the ANZECC (2000) guideline for recreational water quality. This suggestion is for setting minimum water quality targets (i.e. for systems with a moderate to high assimilation capacity). For sensitive systems, setting the 95th percentile targets to a higher standard (i.e. drinking water standard) might be appropriate.</i>	<i>• Omitting TN and TP from list will result in underestimation of impact of nutrient loadings to aquatic systems. • Not clear what numbers in this Schedule refer to. • Are numbers annual mean values or annual medians. • What is the minimum number of samples necessary? • Do these numbers relate to ANZECC guidelines?</i>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 270 ref. 127</i>		<i>• Including TN and TP and setting clear targets is essential. • Need to be clear if annual medians or annual mean values - Annual median is a better statistic.</i>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 270 ref. 127</i>		<i>• Provides clarity.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 270 ref. 127</i>		<i>• Limits proposed already difficult to comply with.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 270 ref. 127</i>		<i>• Overly restrictive and disproportionate. • Does not take into account economic considerations.</i>
<i>Forest and Bird</i>	271	<i>Amend</i>	<i>Amend Table 15.2 to state precise locations for where the specified</i>	<i>• Bring all waters that are currently below "good" up to or beyond "good". •</i>

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			<p>standards are to be applied, and ensure that they provide as short as possible time frames for current inferior water to be upgraded to meet 'good' or better standards, and ensure that waters with current very good and good water quality are maintained or improved, and all water bodies meet standards suitable for contact recreation and human consumption at all times.</p> <p>Amend Table 15.2 to split upper and lower catchments so that upper catchments, above 900m are in a Receiving Waters Group that has standards that maintain them with 'very good' water quality.</p> <p>Amend Table 15.2 to ensure that catchments with predominantly indigenous vegetation (70% indigenous cover or more) are in a Receiving Waters Group that has standards that maintain them with 'excellent' water quality.</p>	<p>Maintain or improve waters classified as "good". Maintain waters classified as "very good"</p> <ul style="list-style-type: none"> <li>It is not recognised rivers draining higher altitude and lesser developed areas have excellent water quality.</li> <li>Timeframes to improve water quality standards must not exceed 5 years.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>Not all waterways need to be enhanced.</li> <li>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support in part submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>Subdividing categories into upper and lower catchments would be helpful and could lead to more appropriate receiving water standards.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Oppose in part submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>5-year time frame is overly restrictive and is likely to have significant economic and social effects.</li> <li>Standard to have water suitable for contact recreation and human consumption in all waterbodies at all times is unachievable.</li> </ul>
<i>Central Otago Environmental Society</i>	1028	<i>Support submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>Schedule should reflect policy objective to enhance / improve water quality.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>Addition of precise locations and standards would need to be subject to a plan change and public submission.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>Not all waterways need to be enhanced.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			

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<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Limits and timeframes unachievable. Low limits not necessary where assimilative capacity of receiving water sufficient to avoid adverse effects.</i></li> <li>• <i>Some farms won't meet targets, even with best practice.</i></li> <li>• <i>Increasing standards and restricting activities in high altitude areas isn't justified given lack of issues.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Reasons set out in Trustpower's submission.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>The expectation that all water bodies meet standards suitable for contact recreation and human consumption standards at all times is unrealistic and does not materially add to the plan.</i></li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Oppose in part submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Oppose extending timeframes to no more than 5 years as it is overly restrictive, appears to have been suggested without recognition of whether 5 years is suitable. Would have significant social and economic effects. Balance must be struck between the environment and social, economic and cultural factors. Seek that the submission be disallowed.</i></li> <li>• <i>Oppose suggestion that all water bodies meet standards for contact recreation and human consumption at all times. Unachievable, won't be met following rain. Seek that the submission be disallowed.</i></li> <li>• <i>Support further division into upper and lower catchments, could lead to more appropriate receiving water standards. Seek that the submission be allowed.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Fish and Game (Otago)	287	Amend	<p>Limits for all areas are supported.</p> <p>Compliance date of 31 March 2012 is supported.</p> <p>Pomahaka - this river must be split into upper and lower sections, with a boundary at Dusky Falls. The upper Pomahaka should be in Area 4 catchments.</p> <p>Shotover - most if not all of the Shotover should be an Area 4 catchment, accepting that the turbidity in this catchment is exempt.</p> <p>Lake Onslow needs to be in Area 4 catchments it is not a lake prone to eutrophication, or if it is, [submitter] doesn't know about this problem currently. If land use around the lake is about to change such to require it to be in a lower category, this should not be the impetus for changing the standard for this lake.</p>	<ul style="list-style-type: none"> <li>• <i>Delineation between upper and lower catchments is a concern.</i></li> <li>• <i>Different area values may result in degradation of quality or an acceptance of the status quo, rather than improvement.</i></li> <li>• <i>Further information on other catchments will be provided in formal submission.</i></li> </ul>

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			The same applies for any relatively pristine upper catchments within Central and Coastal Otago. Currently the limits may result in a legal lowering of water quality for these catchments. A suggestion would be to have an Area 4 inclusion for all headwater streams in Central Otago, above the line of existing development.  CFU needs to be changed to a direct measure of E coli. Public Health South may advise on this.	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 287 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Inadequate justification provided.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 287 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Reasons set out in Trustpower's submission.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 287 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 127</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
<i>Dugald MacTavish</i>	294	<i>Amend</i>	Are there some pristine locations where more stringent controls are required?	<ul style="list-style-type: none"> <li>• <i>Important existing water quality is protected or enhanced.</i></li> <li>• <i>Don't let it be permitted for water quality to decline to common standard.</i></li> <li>• <i>Lag effect with groundwater may be difficult to achieve targets in timeframes.</i></li> <li>• <i>Difficult to assess impact to groundwater from certain land uses and linking</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				with specific landowners.
The Director-General of Conservation	306	Amend	Receiving water Group 1-5 is amended so that the location of where the specified measures of good receiving water quality are to be met are clearly noted.  Receiving water Group 4 be amended to include all portions of the regions waterways above 800m asl.	<ul style="list-style-type: none"> <li>No indication in scheduled catchments where any of the specified measures will be met. No certainty they can be accurately measured. Measures in Table 15.2 are therefore contrary to RMA section 35(2)(b).</li> <li>Higher portions of catchments in Otago have better quality than lower sections.</li> <li>Support Table 15.2 subject to amendments.</li> </ul>
Forest and Bird NZ	1007	Support submission 306 ref. 127		<ul style="list-style-type: none"> <li>Establishing point of measurement adds certainty to the plan.</li> <li>All upland waterways have better water quality than lower catchments and this needs to be maintained.</li> </ul>
Craiglea Limited	1012	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>No evidence from environmental impacts from agricultural activities.</li> <li>Changes are vague, unclear and open-ended.</li> <li>No need on further restrictions on discharges.</li> <li>Requires and enormous number of staff to monitor.</li> </ul>
Contact Energy Limited	1013	Support in part submission 306 ref. 127		<ul style="list-style-type: none"> <li>It should be made clear where receiving water quality standards are to be measured and met, depending on the location chosen.</li> </ul>
Hopfield Investments Ltd	1019	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Would impact on farming operation.</li> <li>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>Costs of the proposed changes outweigh the benefits.</li> </ul>
Strath Taieri Community Board	1029	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
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Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>Inappropriate and costly to require consents for structures over rivers, lakes &amp;</li> </ul>
Central Otago District Council	1051			
Moutere Station Limited	1052			
Hawkdun Station	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>Shouldn't restrict necessary farming discharges.</li> <li>No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Inconsistency with RMA Part II.</li> <li>Extends beyond scope of plan change.</li> <li>Will impact farming given lack of environmental issues.</li> </ul>
TrustPower	1059	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Reasons set out in Trustpower's submission.</li> </ul>
Alliance Group Limited	1060	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Alliance seeks that Table 15.2 is withdrawn for the reasons in its original submission.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Snowline Ltd	1076	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Poorly conceived, arbitrary and unnecessarily onerous.</li> <li>Not supported by empirical data.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 127		<ul style="list-style-type: none"> <li>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>Rules fail relevant tests under section 32 RMA.</li> <li>Additional controls not justified in terms of effects.</li> <li>Seek the submission be disallowed.</li> </ul>

### 128 Schedule 16 - Discharge limits for water quality

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Andrew McCurdy	6	Support	Maintain proposed levels through the process thus protecting water quality - don't water it down.	<ul style="list-style-type: none"> <li>Stringent setting of specified limits for discharges will protect water quality.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 6 ref. 128		<ul style="list-style-type: none"> <li>Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>Does take into account local environmental conditions and economic/development consideration.</li> </ul>
Hewett Farm Ltd	39	Did not specify	To understand what the minimum acceptable levels will be that balance economic considerations, and what these implications are	<ul style="list-style-type: none"> <li>Not satisfied with explanation of why targets have been set at the levels they have.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
University of Otago, Department of Zoology	57	Amend	for land owners, over what time frame for implementation. Include cumulative effects (contamination from several farms in a catchment combined) by adding a separate class for cumulative maximums in waterways, and localised areas of lakes.  Assign lower values to Area 1 limits per discharge, in addition to the introduction of cumulative maximums per catchment.	<ul style="list-style-type: none"> <li>• Will levels maintain water quality at acceptable economic cost?</li> <li>• Current limits potentially interpreted to apply to individual farms.</li> <li>• Number of farms in small catchment with compliant discharges might cumulatively mean an unacceptable effect.</li> <li>• Discharge limits in Area 1 too generous and would decrease water quality.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 57 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Cumulative effects are incorporated.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 57 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Difficult to manage.</i></li> <li>• <i>Unreasonable for one farmer to be accountable for all issues in catchment.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 57 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</i></li> </ul>
C P Mulholland	58	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• How do farmers measure a discharge, or water from thunderstorms, snow melt.</li> <li>• May rain 2ml on farm but neighbour gets 30ml so uncontrollable to farmer downstream.</li> <li>• Not practical to farming operations.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 58 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Limits difficult to comply with even in "good" catchments.</i></li> <li>• <i>Difficulties in practicality, measurement, statistic presentation and justification.</i></li> <li>• <i>Needs amendments to limits and increase in transition times.</i></li> </ul>
Green Party (Dunedin Branch)	62	Amend	Would recommend a 2 year period [transition time].	<ul style="list-style-type: none"> <li>• Seven years and five years too long.</li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 62 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Request is inappropriate and unreasonable and would place unnecessary costs on resource users.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>A two-year transition period is too short.</i></li> </ul>
<i>Mr RJ Borst</i>	1034			
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Central Otago Wine Growers Association	1054			
Otago Water Resource Users Group	1056	Oppose submission 62 ref. 128		<ul style="list-style-type: none"> <li>Unreasonably short timeframe.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 62 ref. 128		<ul style="list-style-type: none"> <li>Reduction in lead in times unworkable and not achievable.</li> </ul>
Fonterra Co-operative Group Limited	1068	Oppose submission 62 ref. 128		<ul style="list-style-type: none"> <li>Discharge standards questionable as to attainability, if retained an equitable timeframe to attempt to attain them will be required.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 62 ref. 128		<ul style="list-style-type: none"> <li>Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>Does take into account local environmental conditions and economic/development consideration.</li> <li>Disproportionate and overly restrictive.</li> </ul>
Gerald Burgess	65	Amend	Triple N number to be more leaner.	<ul style="list-style-type: none"> <li>Winter tests give high results with wet weather.</li> <li>High clover usage.</li> <li>Waterfowl gives bad results.</li> </ul>
Barry John Burgess	66	Amend	Lift acceptable NNN levels to 1.5 - 2 (mg/l) instead of 0.45 mg/l in winter.  E Coli levels need to be lots higher in the dry summer time.	<ul style="list-style-type: none"> <li>Unachievable.</li> </ul>
Stephen Crawford	73	Amend	Need to include a window over the winter period for livestock grazing on winter feed crops. The schedule of discharge for this window needs to be higher. Window needs to be from 1 June to mid August.  Need to have consultation with community and stakeholders before anything in Schedule 16 is set.	<ul style="list-style-type: none"> <li>Proposed limits unachievable over winter when grazing stock on crops in certain weather conditions.</li> <li>Too ambiguous - is the 12 hour window enough, what is a rain event (1 or 5 mm)?</li> <li>Doesn't consider soil condition.</li> <li>Lacks the balance required by RMA and does not consider Part 2, Section 5.</li> <li>Schedule 16 limits unobtainable and economically out of reach for most of society.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 73 ref. 128		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments, particularly in winter.</li> <li>Difficulties in practicality, measurement, statistic presentation and justification.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
Jeff & Alison Thompson	78	Amend	More research needs to be done to ensure levels are going to be achievable for most farms within a reasonable cost. Allowances need to be made to include differences in the contents of spring water and the impact this may have in the overall [contaminant] levels in the drains / creeks.  Realistic expectations established as to how these can be worked on.	<ul style="list-style-type: none"> <li>Levels permitted in new rules too low and unrealistic, will have serious impacts on financial viability of farming and wider community.</li> <li>Drains often contain water from naturally occurring springs which may be naturally higher in some nutrients / contaminants and give higher or inaccurate readings.</li> <li>Important that research is done into water quality levels from farms on a variety of soil types and farming operations to demonstrate that these ideals are achievable in all parts of Otago.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 78 ref. 128		<ul style="list-style-type: none"> <li>Measures not realistic and don't account for differing regions and systems.</li> <li>Farmers may breach limits despite taking precautions.</li> </ul>
Alan L Wilson	88	Amend	Would like the standard reduced to a level we can all achieve.	<ul style="list-style-type: none"> <li>Support high water quality in principle, but standard too high, may be higher than natural state without stock, impossible to achieve.</li> </ul>
Ross A & Alexa Wallace	101	Amend	Change the E-coli standard to 500.	<ul style="list-style-type: none"> <li>Testing records show E-coli limit of 126 is too stringent.</li> <li>Clarification of whether the NNN limit is realistic.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Elderslie Dairy Farms Limited	115	Amend	Revisit standards on water quality and set them at a level landowners and farmers can attain in catchments and creeks while still making the practice of farming an economically viable one.	<ul style="list-style-type: none"> <li>Proposed standards are unachievable even with changes to farming management, fencing and riparian planting.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 115 ref. 128</i>		<ul style="list-style-type: none"> <li><i>Amend limits and extend transition times.</i></li> <li><i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li><i>Needs to be more science informed decision making.</i></li> </ul>
Stewart Morrison	116	Amend	Discharge to water should be averaged out as one discharge per farm not individual drains.  Need information on the science behind the limits set.	<ul style="list-style-type: none"> <li>Average discharges over whole farm (15 drains) for a more accurate measure of impact on water quality.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 116 ref. 128</i>		<ul style="list-style-type: none"> <li><i>Amend limits and transition times.</i></li> <li><i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li><i>Needs to be more science informed decision making.</i></li> </ul>
Cath Gilmour	128	Amend	That differential standards be introduced for pristine water catchments.	<ul style="list-style-type: none"> <li>No distinction between pristine water catchments and those already degraded, allowing deterioration of cleanest waterways.</li> </ul>
Grant Bradfield	131	Oppose	This schedule should be replaced.	<ul style="list-style-type: none"> <li>Limits set by ORC staff, not communities as promised.</li> <li>Owaka catchment doesn't meet these standards.</li> <li>ORC hasn't shown source of contamination, so are all farmers in catchment liable?</li> <li>Unachievable, not based on science.</li> </ul>
The Cow Farm Limited	133	Oppose	Oppose.	<ul style="list-style-type: none"> <li>Discharge limits appear arbitrary and lacking science.</li> <li>No evidence these limits achieve the purpose of the RMA.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 128</i>		<ul style="list-style-type: none"> <li><i>Amend limits and transition times.</i></li> <li><i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li><i>Needs to be more science informed decision making.</i></li> </ul>
Clutha Agricultural Development Board	139	Oppose	Oppose the standards proposed.  Ask farmers to ensure that water leaving the farm is of better or equivalent quality to that which enters the farm, rather than suggesting absolute water quality levels.	<ul style="list-style-type: none"> <li>Gives farmers responsibility to take actions which are within their power and is truly effects based approach.</li> <li>"Hard and fast levels" covering all environments and circumstances are problematic and unrealistic.</li> <li>Mitigation methods such as riparian strips and wetland areas could be discouraged under a fixed absolute standard e.g. Water won't meet the standard on entry to a treatment wetland.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 139 ref. 128</i>		<ul style="list-style-type: none"> <li><i>Amend limits and transition times.</i></li> <li><i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li><i>Needs to be more science informed decision making.</i></li> </ul>
Otago Conservation Board	140	Amend	Withdraw Plan Change 6A; or amend Schedule 15 to better reflect the differing receiving environments and the issues they face using historic monitoring records to set specifically targeted limits and goals for the improvement of each waterway.	<ul style="list-style-type: none"> <li>Supports the use of descriptive characteristics.</li> <li>Limits too low for some waterways and could lead to the deterioration of water quality in Otago.</li> <li>Implementation timeframes and standards should take into account TA plans for ongoing maintenance and upgrading of their water treatment plants.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 140 ref. 128</i>		<ul style="list-style-type: none"> <li><i>Reference to historic monitoring gives baseline.</i></li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 140 ref. 128</i>		<ul style="list-style-type: none"> <li><i>Division of region into five categories is not appropriate.</i></li> <li><i>Categories do not reflect characteristics of water bodies.</i></li> <li><i>Amending the Schedule would be helpful and lead to more appropriate standards.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Otago Fish and Game Council	1027	Support submission 140 ref. 128		• No reasons given.
Horticulture New Zealand	1032	Support in part submission 140 ref. 128		• An approach focussed on different receiving environments has merit.
Mr RJ Borst	1034	Support in part submission 140 ref. 128		<ul style="list-style-type: none"> <li>• Supports withdrawal of the plan.</li> <li>• Agree plan provisions are unclear and complex.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
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Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support submission 140 ref. 128		<ul style="list-style-type: none"> <li>• Must be amendments to limits and transition times.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Support submission 140 ref. 128		• Protects habitats and the wider needs of mahika kai, taoka species and other species of importance to Kai Tahu ki Otago.
The NZ Transport Agency	1073	Support submission 140 ref. 128		<ul style="list-style-type: none"> <li>• Division of the region into five broad categories as proposed not considered to be appropriate. Categories that broad do not reflect different characteristics of water bodies.</li> <li>• Amendments proposed helpful and could lead to more appropriate receiving water standards being set.</li> <li>• Seek the submission is allowed and the schedule amended as per the submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 140 ref. 128		<ul style="list-style-type: none"> <li>• Schedule 16 does not take into account local environmental conditions and economic/development consideration.</li> <li>• Schedule 16 is disproportionate and overly restrictive.</li> </ul>
Eloise Neeley	141	Amend	Increase the lead in time for the adoption of Schedule [16] and ensure that the standards are realistic and achievable.	• Current proposal has far reaching effects on farming viability and doesn't provide sufficient time to modify farming or know how such modification should occur.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Even with best practice, some farmers will fail to meet the requirements on their farms.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 141 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Must be amendments to limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
M L & P J Lord Family Trust	143	Amend	<p>Amend schedule 16 to make the limits more achievable and amend the lead in times for achieving the limits to give farmers more time to ensure that they are investing in the right tools to achieve the limits.</p> <p>Review limits in terms of whether they are achievable and make full assessment against the economic impacts of the limits.</p>	<ul style="list-style-type: none"> <li>• Process of setting timeframes for meeting limits must account for achievability and economic cost for meeting limits within specified timeframes.</li> <li>• Not clear if limits are workable or achievable.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 143 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Practical alternatives &amp; more workable rules offered.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 143 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Dairy NZ Limited	146	Oppose	The schedule and associated maps should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> <li>• Don't understand logic behind discharge limits.</li> <li>• No technical report that rationalises limits or locations.</li> <li>• Withdraw until collaboratively worked with community.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Schedule needed to set targets.</i></li> <li>• <i>Amendments needed to protect better water quality in the higher catchments.</i></li> </ul>
<i>Braemorn Farm Ltd</i>	1009	<i>Support submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Better technical analysis is needed</i></li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change process provides for the "working through" of these matters.</i></li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Schedule needed to set targets for water quality.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Provision should be made in transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge limits.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i></li> </ul>
Grant Isbister	151	Oppose	Want catchment based load limits to be set at a realistically achievable level.	<ul style="list-style-type: none"> <li>• Even when farmers fence off ditches, limits not achievable.</li> <li>• Use results from tests carried out on fenced dairy farm ditches to determine realistic load limits.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 151 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Matuanui Ltd	163	Amend	Remove discharge limits from Schedule 16 until a catchment study and community consultation has been undertaken to determine realistic, appropriate, achievable limits for the different catchments.	<ul style="list-style-type: none"> <li>• Farm on tile drains, need to see data and research to have confidence that limits are achievable, and we can continue farming.</li> <li>• Public meetings and information received indicated that community values and practical farming ideas would be included in catchment consultation, this hasn't happened.</li> <li>• Limits aren't achievable, realistic for our area.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 163 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and transition times to allow for reassessment.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Windsor Park Dairies Ltd	185	Oppose	Oppose the proposed plan in regard to the level of E-Coli, NNN, DRP, NH4, TURB. More time and testing will show what is achievable therefore more realistic.	<ul style="list-style-type: none"> <li>• Encouraging to allow innovation to meet goals.</li> <li>• Place emphasis on sustainability and have a well managed dairy farm (see photos and graphs attached to submission)</li> <li>• Limits unachievable, current best practice fails - shown by ORC testing results from our farm site.</li> <li>• Unrealistic levels will be to the detriment of the industry, community and economy.</li> </ul>
Alliance Group Limited	187	Oppose	Ensure the discharge limits proposed are consistent with achieving sustainable management and are not based on singular ecological or environmental premise.	<ul style="list-style-type: none"> <li>• Limits exceptionally low, unnecessary where assimilative capacity of receiving water sufficient to avoid adverse environmental effects beyond a mixing zone.</li> <li>• No explanation in Section 32 for how discharge limits established, if they are based on comprehensive scientific analysis, or take into account existing environment and broader elements of sustainable management (as noted in preamble of NPSFW).</li> <li>• Need certainty that limits will achieve sustainable management (human use and environmental values).</li> <li>• Make information available to submitters regarding how discharge limits devised, and provide opportunity to submit on discharge limits having regard to that information.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 187 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Supports discharge limits that are consistent with the RMA and based on a robust Section 32 assessment.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 16 limits should apply following consideration of assimilative capacity of receiving water.</i></li> <li>• <i>Current draft difficult to enforce.</i></li> <li>• <i>Does not balance all relevant aspects under RMA Section 5.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	Support submission 187 ref. 128		<ul style="list-style-type: none"> <li>• Limits and timeframes unachievable. Low limits not necessary where assimilative capacity of receiving water sufficient to avoid adverse effects.</li> <li>• Some farms won't meet targets, even with best practice.</li> </ul>
Dairy Holdings Limited	195	Oppose	The standards/targets set out in the Schedule (along with the wider plan change) need to be withdrawn until these matters [below in the reasons] can be worked through in a collaborative manner.	<ul style="list-style-type: none"> <li>• Discharge limits not practicable for diffuse pollution, should set catchment/water body total concentration limits.</li> <li>• Source of, or need for, limits unclear.</li> <li>• Unclear how diffuse discharges can be measured.</li> <li>• Overly onerous, not realistically achievable.</li> <li>• Section 32 report and technical analysis do not justify the need for, or implications of, rule.</li> <li>• Discharge limits (as opposed to catchment load limits) are not practicable for diffuse pollution.</li> <li>• Will be difficult, onerous and costly for individual farmers to measure discharge.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	Support submission 195 ref. 128		<ul style="list-style-type: none"> <li>• Submission outlines concern of further submitter.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 195 ref. 128		<ul style="list-style-type: none"> <li>• Amend limits and transition times to allow for reassessment.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
<i>Glenshee Station Limited</i>	1062	Support in part submission 195 ref. 128		<ul style="list-style-type: none"> <li>• Support in part, particularly regarding wider effect of the plan change.</li> <li>• Although it doesn't request total withdrawal the submission recognises lack of specificity of controls and concern for lack of evidence supporting discharge limits, particularly given reliance on prohibited activity status.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Support in part submission 195 ref. 128		<ul style="list-style-type: none"> <li>• Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	That Schedule 16 be retained, but that the values set out should be maximum values rather than averages.  AND  That Schedule 16 sets out where, physically, these values are to be monitored.	<ul style="list-style-type: none"> <li>• Values in Schedule 16 won't achieve outcomes in Table 15.1.</li> <li>• Implementation concerns, monitoring at current ORC sites, or where waterway leaves property, or everywhere discharges may enter water (numerous and impossible to achieve)?</li> </ul>
<i>The Director-General of Conservation</i>	1011	Support submission 197 ref. 128		<ul style="list-style-type: none"> <li>• Support submission for identifying where the values will be monitored.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Oppose in part submission 197 ref. 128		<ul style="list-style-type: none"> <li>• Limits and transition times unachievable.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
<i>Alliance Group Limited</i>	1060	Oppose submission 197		<ul style="list-style-type: none"> <li>• Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological</li> </ul>

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		<i>ref. 128</i>		<i>or environmental premise, for the reasons in its original submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i></li> </ul>
Irrigation New Zealand Incorporated	202	Oppose	<p>Withdraw. Schedule 16 need be reviewed in collaboration with stakeholders.</p> <p>Agrees that it is not practicable to set limits for each individual catchment [as per NPSFW], however there is a need for greater engagement with communities at the sub-region level than has occurred in this instance.</p>	<ul style="list-style-type: none"> <li>• Unable to locate technical reports that support discharge limits and transition times.</li> <li>• First set freshwater objectives then set limits accordingly.</li> <li>• Objectives and limits include environmental, social, cultural, and economic values.</li> <li>• Need robust decision making.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 202 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Supports collaborative approach.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 202 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Matters within tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 202 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</i></li> </ul>
NZ Transport Agency	203	Amend	Revise the limits in Schedule 16 so that they are appropriate and attainable.	<ul style="list-style-type: none"> <li>• Not allowing for mixing zones is inappropriate.</li> <li>• Such stringent standards are inappropriate.</li> <li>• In supporting documentation, limits derived from medians, but these applied as maximums.</li> <li>• Limits based on data under general conditions, inappropriate for worst-case situations.</li> <li>• Concerned unachievable even with best management practices.</li> <li>• Basing receiving water targets as discharge limits do not reflect actual environmental impact.</li> <li>• Currently available information shows proposed limits not realistic.</li> <li>• Future extension to infrastructure discharges concerning.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Limits difficult to comply with even in "good" catchments.</i></li> <li>• <i>Difficulties in practicality, measurement, statistic presentation and justification.</i></li> <li>• <i>Needs amendments to limits and increase in transition times.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</i></li> </ul>
M C Holland Farming Ltd	207	Amend	That Schedule 16 is amended to set realistic and measureable discharge limits and time limits to attain them.	<ul style="list-style-type: none"> <li>• Oppose Schedule 16 as consider them unachievable.</li> <li>• Not aware of treatment system that would achieve limits.</li> <li>• No means to collect non-point source discharges.</li> <li>• Meeting limits not practical or possible.</li> <li>• Limits would push us too consent.</li> </ul>

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				<ul style="list-style-type: none"> <li>• Poses significant risk to ongoing farm viability.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 207 ref. 128		<ul style="list-style-type: none"> <li>• Limits difficult to comply with even in "good" catchments.</li> <li>• Difficulties in practicality, measurement, statistic presentation and justification.</li> <li>• Needs amendments to limits and increase in transition times.</li> </ul>
Dunedin City Council	211	Amend	<p>The discharge limits contained in Schedule 16 are revised so that they are appropriate and attainable.</p> <p>Rules in Chapter 12.C are amended to make clear that compliance with Schedule 16 limits is only required by the dates in Schedule 16.</p>	<ul style="list-style-type: none"> <li>• Translating medians to maximums is highly conservative and not appropriate.</li> <li>• More restrictive than necessary to achieve water quality objectives.</li> <li>• Concerned even with best management practice they will be unachievable.</li> <li>• Timeframes not reflected in rules, this could be interpreted as limits applying from notification.</li> </ul>
Meridian Energy Limited	1014	Support in part submission 211 ref. 128		<ul style="list-style-type: none"> <li>• Discharge limits should be revised.</li> <li>• Supports a revision of limits based on a robust Section 32 report.</li> </ul>
Strath Taieri Community Board	1029	Support submission 211 ref. 128		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Clutha District Council	1050	Support submission 211 ref. 128		<ul style="list-style-type: none"> <li>• Schedule 16 requires review.</li> <li>• Section 32 analysis was inadequate.</li> <li>• Prohibitions are overly restrictive and have unintended application due to schedule 16 limits.</li> </ul>
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support submission 211 ref. 128		<ul style="list-style-type: none"> <li>• Amend limits and transition times.</li> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
Alliance Group Limited	1060	Support submission 211 ref. 128		<ul style="list-style-type: none"> <li>• Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 211 ref. 128		<ul style="list-style-type: none"> <li>• Greater flexibility should be introduced (particularly in relation to the timeframes).</li> </ul>
T A Whiteside & Co Ltd	212	Amend	Delete proposed generic limits on Nitrogen loss to Groundwater, retain permitted activity status, work over longer time frames to introduce limits that provide for losses from different land use types, appropriate to what would occur under adopted best practice.	<ul style="list-style-type: none"> <li>• Concerned proposed changes could influence management practices.</li> <li>• Restrict amount of nitrogen we use.</li> <li>• Affect potential yields and financial viability.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 212 ref. 128		<ul style="list-style-type: none"> <li>• Concerns with rule workability.</li> <li>• Farmers may breach limits despite taking precautions.</li> </ul>
Waverley Downs Ltd	220	Amend	<p>Amend N limits to ensure that N loss limits are achievable under different land use scenarios. Introduce differentiated N loss limits for shoulders of spring/autumn and winter where flows are high and water temperature will limit any effects of loss.</p> <p>Increase limits in sensitive zones to make these more achievable.</p> <p>Increase and stagger phase in times for achieving limits.</p>	<ul style="list-style-type: none"> <li>• Application timings of nitrogen are critical to achieve good yields.</li> <li>• Heavy rainfall could compromise our position.</li> <li>• Any reduction in yields/gross margin will impact on business.</li> <li>• Insufficient evidence showing direct relationship between N discharges and application under good practice.</li> <li>• Mole and tile drains raise concerns about achievability of limits.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 220 ref. 128		<ul style="list-style-type: none"> <li>• Measures not realistic and don't account for differing regions and systems.</li> <li>• Farmers may breach limits despite taking precautions.</li> <li>• Limits need greater scientific justification.</li> </ul>
Hamish Anderson	221	Amend	Mixing zones should be allowed. Discharge limits should be increased allowing for mixing, not set at the desired receiving water standards.	<ul style="list-style-type: none"> <li>• Disconnect between first principles and Schedule 16.</li> <li>• Standards too tight for the environmental outcomes, only good for enforcement purposes.</li> </ul>

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				<ul style="list-style-type: none"> <li>• Not enough work done to prove standards can be met.</li> <li>• Best practice options should be sensible and not detrimental.</li> <li>• AgResearch report shows a drop of 10% in dairy and 50-100% sheep/beef profits if all best practice measures adopted.</li> <li>• Limits should be increased to allow for mixing.</li> <li>• Misleading as targets in consultation (Table 15.1) don't line up with proposed standards.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 221 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Amend limits and transition times to allow for reassessment.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
Fonterra Co-operative Group Limited	241	Oppose	The schedule and associated maps should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> <li>• Don't understand logic behind discharge limits.</li> <li>• No technical report that rationalises limits or locations.</li> <li>• Withdraw until collaboratively worked with community.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 241 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Supports collaborative approach.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Need greater collaboration, technical robustness and clarity.</i></li> <li>• <i>No scientific justification for limit, lack of link between limit and environmental benefit.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i></li> <li>• <i>Consistent with relief sought by further submitter.</i></li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Oppose	<p>Opposes the limits included in Schedule 16 and seeks consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water in order to address the concerns raised.</p> <p>Consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water.</p>	<ul style="list-style-type: none"> <li>• Source of limits is unclear.</li> <li>• One set of limits for a diversity of catchments is not appropriate.</li> <li>• Nutrient discharge limits is unlikely to be practical for diffuse discharges. Catchment loading limits more helpful.</li> <li>• Diffuse discharges are diffuse - therefore impractical to take samples at point of discharge.</li> <li>• Limits don't allow for mitigation or avoidance of adverse effects through mixing with receiving waters.</li> <li>• Excessively restrictive and likely to be unachievable for productive farming.</li> <li>• Likely outcome will be unmanageable compliance demands for consents.</li> <li>• Rules are inconsistent with RMA due to lack of allowance for reasonable mixing and proposed method not being effects based.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Supports setting of catchment load limits.</i></li> <li>• <i>Imposed limits should be supported by Science and technical data.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			



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<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	Support submission 248 ref. 128		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments.</li> <li>Difficulties in practicality, measurement, statistic presentation and justification.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
<i>Alliance Group Limited</i>	1060	Support submission 248 ref. 128		<ul style="list-style-type: none"> <li>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</li> </ul>
Sandy Bay Ltd	249	Amend	Remove discharge limits from Schedule 16 until a catchment study and community consultation has been undertaken to determine realistic, appropriate, achievable limits for the different catchments.	<ul style="list-style-type: none"> <li>Want to see science data and research behind limits</li> <li>Will there be individual catchment consultation if don't think the limits are achievable.</li> <li>What happens if can't meet the limits after doing everything possible?</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc	252	Oppose	<p>Opposes the limits included in Schedule 16 and seeks consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water in order to address the concerns raised.</p> <p>Consideration of an alternative approach that involves setting catchment-wide loading limits link to the assimilative capacity of water.</p>	<ul style="list-style-type: none"> <li>Source of limits is unclear.</li> <li>One set of limits for a diversity of catchments is not appropriate.</li> <li>Nutrient discharge limits is unlikely to be practical for diffuse discharges. Catchment loading limits more helpful.</li> <li>Diffuse discharges are diffuse - therefore impractical to take samples at point of discharge.</li> <li>Limits don't allow for mitigation or avoidance of adverse effects through mixing with receiving waters.</li> <li>Excessively restrictive and likely to be unachievable for productive farming.</li> <li>Likely outcome will be unmanageable compliance demands for consents.</li> <li>Rules are inconsistent with RMA due to lack of allowance for reasonable mixing and proposed method not being effects based.</li> </ul>
<i>Mr RJ Borst</i>	1034	Support submission 252 ref. 128		<ul style="list-style-type: none"> <li>Supports setting of catchment load limits.</li> <li>Imposed limits should be supported by science and technical data.</li> <li>Rules need to be clear and unambiguous.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			

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Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support submission 252 ref. 128		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments.</li> <li>Difficulties in practicality, measurement, statistic presentation and justification.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
Alliance Group Limited	1060	Support submission 252 ref. 128		<ul style="list-style-type: none"> <li>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</li> </ul>
Queenstown Lakes District Council	255	Amend	<p>Amend Schedule 16 to better reflect the differing receiving environments and the issues they face.</p> <p>Allowance for appropriate mixing zones should be included.</p>	<ul style="list-style-type: none"> <li>Standards don't reflect variations between water bodies, or high quality of receiving environment e.g. E coli.</li> <li>Could result in reduction of water quality.</li> <li>Standards and timeframes should reflect maintenance and upgrading of water treatment plants.</li> <li>More targeted and accurate standards should be set.</li> </ul>
Meridian Energy Limited	1014	Support submission 255 ref. 128		<ul style="list-style-type: none"> <li>Supports discharge limits that are consistent with the RMA, and based on a robust Section 32 assessment recognising natural variability in water quality across the region.</li> </ul>
Dunedin City Council	1025	Support submission 255 ref. 128		<ul style="list-style-type: none"> <li>Schedules 15 and 16 do not accurately reflect variations between water bodies.</li> <li>Allowance for appropriate mixing zones should be included.</li> </ul>
Clutha District Council	1050	Support in part submission 255 ref. 128		<ul style="list-style-type: none"> <li>Schedule 16 limits should reflect variations in waterbodies.</li> </ul>
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support submission 255 ref. 128		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments.</li> <li>Difficulties in practicality, measurement, statistic presentation and justification.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
The NZ Transport Agency	1073	Support submission 255 ref. 128		<ul style="list-style-type: none"> <li>Recognition Schedules 15 and 16 don't accurately reflects variations between water bodies.</li> <li>Agreed that allowance for appropriate mixing zones should be included.</li> <li>Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</li> <li>Seeks the submission be allowed and the plan change be amended as per the submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 255 ref. 128		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Waitaki Irrigators Collective Limited	257	Amend	<p>The limits should be set after further community consultation, potentially as part of the catchment programmes and studies to be implemented as per the draft LTP.</p> <p>The timeframes for achieving the limits in the Schedule should therefore be adjusted to allow for sufficient lead-in time once more appropriate limits have been set.</p>	<ul style="list-style-type: none"> <li>ORC requested feedback if water body accrual type but unclear if feedback was taken into account.</li> <li>Unclear if accrual method was even used to determine discharge limit areas.</li> <li>Objectives and limits should be determined at sub-regional level following catchment studies/programmes in draft LTP.</li> <li>Need to clarify whether catchments which discharge into another water body are included e.g. discharge into Waitaki.</li> <li>Informed limits and rules developed would be sound and achievable.</li> <li>Community would be better informed to make decisions following catchment by catchment programmes (as set in LTP).</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 257 ref. 128		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments.</li> <li>Difficulties in practicality, measurement, statistic presentation and justification.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
North Otago Irrigation Company	260	Amend	Amend the Schedules to provide clarity as to which waterways are	<ul style="list-style-type: none"> <li>Difficult to know how and where discharge limits apply where water is</li> </ul>

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			<p>captured under Schedule 15 and which are off farm discharges which must meet the limits under Schedule 16.</p> <p>Amend timeframes in Schedule 16 to allow the proposed limits regime to be tested.</p> <p>Amend discharge limits in Schedule 16 so they are achievable, and also so that they are appropriately linked to receiving water quality targets. A number of options could be considered to achieve this, such as:</p> <ul style="list-style-type: none"> <li>• Amend discharge limits to reflect MFE SOE reporting approach - e.g. four out of five of the proposed parameters tested must meet the proposed limits.</li> <li>• Increase discharge limits in some catchments or 'zones' only depending on the key characteristics of the catchment or 'zone'.</li> <li>• Increase discharge limits for smaller watercourses only, e.g. first and second order watercourses.</li> <li>• Increase discharge limits across the board to reflect the 'average' assimilative capacity of watercourses.</li> <li>• Ensure limits regime reflects actual contribution of contaminants to a water body.</li> </ul> <p>Re-consider the proposed discharge limits to make some allowance for the assimilative capacity of watercourses and recognise the investment that has been made in existing farming operations and the many other important environmental (e.g. weed control, pest control) and social services these businesses provide.</p> <p>Clarify how the rules will be applied where watercourses do not discharge to the coast within Otago's regional boundaries.</p> <p>That Schedule 16 is amended so that:</p> <ul style="list-style-type: none"> <li>• The Waiareka and Kakanui catchments are treated separately.</li> <li>• The Waiareka catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments.</li> <li>• The Kakanui catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments.</li> <li>• The Schedule 16 discharge limits are appropriately linked to receiving water quality and are set at a level that is achievable for farmers</li> </ul>	<p>discharged to water - would apply where a farm drain or watercourse discharges to a watercourse.</p> <ul style="list-style-type: none"> <li>• Discharge limits not achievable - even with best practice - will require changes that will severely impact on economic viability of farming (does not meet RMA requirement of balancing economic/social considerations with environmental).</li> <li>• Submitter offers to work with ORC on determining achievability of limits, and any changes needed - likely longer transition times would be needed.</li> <li>• Higher discharge limits could achieve water quality objectives without such an impact on farming.</li> <li>• No direct link between discharge contaminant levels and receiving water quality; assimilative capacity of watercourses not taken into account (recognised in RMA).</li> <li>• Low volume discharges of high contaminant concentration will have no impact on receiving water body quality.</li> <li>• Unlisted catchments that do not discharge to the coast are not clearly dealt with in the plan change.</li> <li>• In some catchments different limits are appropriate. Certain hydrogeomorphic processes in the Waiareka catchment mean the objectives and discharge limits are not appropriate.</li> <li>• Waiareka and Kakanui catchments are different. Both are on boundary between long and short accrual, and were in short accrual group during consultation.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 260 ref. 128</i>		<i>• For reasons set out in the original submission.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 260 ref. 128</i>		<i>• Supports consideration of Waiareka and Kakanui catchments</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 260 ref. 128</i>		<i>• Limits difficult to comply with even in "good" catchments. • Difficulties in practicality, measurement, statistic presentation and justification. • Needs amendments to limits and increase in transition times.</i>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 128</i>		<i>• Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i>

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<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Support the NOIC submission in full.</i></li> </ul>
Bernard Lynch	261	Amend	Support the concept but reduce the discharge limits to more manageable levels.	<ul style="list-style-type: none"> <li>• In consultation ORC related limits to average catchment discharge levels.</li> <li>• More details on numbers of current exceedences needed to determine if limits are manageable.</li> </ul>
Ballance Agri-Nutrients Ltd	262	Oppose	<p>Opposes the limits included in Schedule 16 and seeks consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water in order to address the concerns raised.</p> <p>Consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water.</p>	<ul style="list-style-type: none"> <li>• Source of limits is unclear.</li> <li>• One set of limits for a diversity of catchments is not appropriate.</li> <li>• Nutrient discharge limits is unlikely to be practical for diffuse discharges. Catchment loading limits more helpful.</li> <li>• Diffuse discharges are diffuse - therefore impractical to take samples at point of discharge.</li> <li>• Limits don't allow for mitigation or avoidance of adverse effects through mixing with receiving waters.</li> <li>• Excessively restrictive and likely to be unachievable for productive farming.</li> <li>• Likely outcome will be unmanageable compliance demands for consents.</li> <li>• Rules are inconsistent with the RMA due to lack of allowance for reasonable mixing and the proposed method not being effects based.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Supports setting of catchment load limits.</i></li> <li>• <i>Imposed limits should be supported by Science and technical data.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 262 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Limits difficult to comply with even in "good" catchments.</i></li> <li>• <i>Difficulties in practicality, measurement, statistic presentation and justification.</i></li> <li>• <i>Needs amendments to limits and increase in transition times.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</i></li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Additional flexibility in timeframes is sought.	<ul style="list-style-type: none"> <li>• Individual discharge limits are the most appropriate way to give effect to NPSFW.</li> <li>• Transition times are needed.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Federated Farmers of New Zealand	1057	Support submission 263 ref. 128		<ul style="list-style-type: none"> <li>Difficulties in practicality, measurement, statistic presentation and justification.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
Environmental Defence Society	267	Amend	To amend the permitted activity discharge limits to ensure that cumulatively they do not give rise to effects outlined in Section 70 of the RMA, and that they maintain or improve water quality.	<ul style="list-style-type: none"> <li>Setting catchment load limits is only effective way to manage cumulative effects of multiple discharges.</li> <li>Permitted activity limits should not exceed catchment limits.</li> </ul>
Mr RJ Borst	1034	Oppose in part submission 267 ref. 128		<ul style="list-style-type: none"> <li>Oppose suggestion all applications for resource consent should be publicly notified.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
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Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Oppose submission 267 ref. 128		<ul style="list-style-type: none"> <li>Difficulty for landowners to comply individually when considering cumulative effects. Difficulty in monitoring and enforcement.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 267 ref. 128		<ul style="list-style-type: none"> <li>Oppose submission in that it supports plan change and use of prohibited activity status.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 267 ref. 128		<ul style="list-style-type: none"> <li>Inconsistent with relief sought by further submitter.</li> </ul>
Colin Scurr	268	Amend	<p>Amend Schedule to reflect properly differentiated statistical models for discharge standards and allowing for reasonable mixing.</p> <p>Add provision to make tests to be an average of 5 samples over a period of 24 hours.</p>	<ul style="list-style-type: none"> <li>Unclear how limits relate to environmental effects.</li> <li>Unnecessarily restrictive.</li> <li>Unlawful to have limits that apply 'prior to the point of discharge'.</li> <li>Limits should apply after reasonable mixing or be increased to reflect dilution or assimilation capacity.</li> <li>Unclear why limits selected are necessary to achieve purpose of RMA.</li> <li>Standards must be practical and achievable.</li> <li>No regime for circumstances where limits cannot be reached or other effects outweigh actual or potential effects of allowing the discharge.</li> <li>One sample can be contaminated.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 268		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments.</li> <li>Difficulties in practicality, measurement, statistic presentation and justification.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Needs amendments to limits and increase in transition times.</i></li> </ul>
Horticulture New Zealand	269	Amend	Withdraw Schedule 16 and establish a process with the community to review the natural and human use valued in the Plan and amend Schedule 16 so that the natural and human use values are supported and achievable.	<ul style="list-style-type: none"> <li>• Limits are unrealistic.</li> <li>• Application and implementation unworkable.</li> <li>• No robust technical analysis of numbers or cost-benefit analysis of their effectiveness and efficiency.</li> <li>• Unclear how 2 areas in Schedule 16 relate to the 5 receiving water groups in Schedule 15.</li> <li>• <b>Maps are not at sufficient scale.</b></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Must be amendments to limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</i></li> </ul>
Marc Schallenberg	270	Amend	<p>Add total N and total P to these tables.</p> <p>Suggest that the thresholds in these tables should represent the target 95th percentile of the annual distribution of the values from each river/lake and this 95th percentile should be set as the ANZECC (2000) guideline for recreational water quality. This suggestion is for setting minimum water quality targets (i.e. For systems with a moderate to high assimilation capacity). For sensitive systems, setting the 95th percentile targets to a higher standard (i.e. drinking water standard) might be appropriate.</p>	<ul style="list-style-type: none"> <li>• Omitting TN and TP from list will result in underestimation of impact of nutrient loadings to aquatic systems.</li> <li>• Not clear what numbers in this Schedule refer to.</li> <li>• Are numbers annual mean values or annual medians.</li> <li>• What is the minimum number of samples necessary?</li> <li>• Do these numbers relate to ANZECC guidelines?</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 270 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Collaborative process required to consider thresholds.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 270 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Limits proposed already difficult to comply with.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 270 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Forest and Bird	271	Amend	<p>Amend Schedule 16 if necessary to ensure that it provides for current inferior water to be upgraded to meet 'good' or better standards, and ensure that waters with current very good and excellent water quality are maintained or improved.</p> <p>Delete time frames of March 2019 and replace with March 2017.</p>	<ul style="list-style-type: none"> <li>• Supports Schedule as long as improves all waterways..</li> <li>• Reduce timeframes to 5 years.</li> <li>• Improving water quality is a keenly sought priority by general public.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Background data required before any agricultural activities are restricted.</i></li> </ul>
<i>Dunedin City Council</i>	1025	<i>Oppose submission 271 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>5-year time frame is overly restrictive and is likely to have significant economic and social effects.</i></li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Reduced timeframe is unrealistic</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> </ul>

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Mr NS Mackenzie	1035	submission 271 ref. 128		
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
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Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Oppose submission 271 ref. 128		<ul style="list-style-type: none"> <li>• Even with best practice limits and levels not achievable. Reducing timeframes reduces likelihood of success.</li> <li>• Low limits not necessary where assimilative capacity sufficient to avoid adverse effects.</li> </ul>
Alliance Group Limited	1060	Oppose submission 271 ref. 128		<ul style="list-style-type: none"> <li>• Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 271 ref. 128		<ul style="list-style-type: none"> <li>• Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
The NZ Transport Agency	1073	Oppose submission 271 ref. 128		<ul style="list-style-type: none"> <li>• The amended timeframe is overly restrictive and would have significant social and economic effects.</li> <li>• Seek that the submission be disallowed.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 271 ref. 128		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Fish and Game (Central South Island)	273	Support	<p>Address the use of Schedule 15 in an explanation.</p> <p>Clarity need to be provided on whether the standards in Schedule 16 are within the receiving bodies, or for contaminants in a discharge prior to them entering water.</p>	<ul style="list-style-type: none"> <li>• Limits are ecologically sound and will improve water quality where degraded.</li> <li>• Supportive of setting water quality standards and timeframes for achieving these.</li> </ul>
Craiglea Limited	1012	Oppose submission 273 ref. 128		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> <li>• Affected by a variety of activities, not just agricultural uses.</li> <li>• Imposes unnecessary constraints on farming practices.</li> </ul>
Mr RJ Borst	1034	Oppose submission 273 ref. 128		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 273 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</i></li> </ul>
T M and C M Scurr	275	Oppose	A catchment by catchment standard and limits should apply.	<ul style="list-style-type: none"> <li>• Setting an Otago wide standard is not a good idea as Cardrona Valley has other characteristics.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 275 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Matters within schedules and tables lack investigation, scientific basis &amp; are not achievable.</i></li> <li>• <i>Greater robustness in decision making needed.</i></li> </ul>
Federated Farmers of New Zealand	278	Amend	<p>Amend limits and increase transition times.</p> <p>Maps must be updated to indicate discharge limit areas 1 and 2 to more appropriately reflect ANZECC descriptions and the state of the receiving water body.</p>	<ul style="list-style-type: none"> <li>• Limits unlikely to be complied with at off-farm level irrespective of receiving environment classification (i.e. even in catchments considered 'good' water quality).</li> <li>• Difficulties in the practicality, measurement, statistical presentation and scientific justification of the methodology.</li> <li>• Reflecting ANZECC median guidelines will enable sound scientific and statistical approach as opposed to notified Schedule 16.</li> <li>• Currently no connection between appropriate median for 'good' water quality in the receiving environment and measurement and reporting of the discharge.</li> <li>• Schedule 16 should incorporate the off-farm discharge as a median increase in water quality and include surface water and groundwater components.</li> <li>• Groundwater parameter should only include NNN.</li> <li>• Discharge limits should be set in comparison to receiving environment e.g. based on median values for receiving water and discharges.</li> <li>• Under this modified option, a reverse sensitivity will occur where outlying discharges inconsistent with the median state of receiving water quality can be identified. This is a sound scientific and statistical approach.</li> <li>• Minimum of 5 years to comply considered appropriate.</li> <li>• Existing areas are not detailed correctly according to ANZECC and insufficient information is provided as to how these have been stipulated.</li> </ul>
<i>Hopfield Investments Ltd</i>	1019	<i>Support submission 278 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Operation relies on natural streams for continuing viability.</i></li> <li>• <i>Plan change has huge impact on farming business.</i></li> <li>• <i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i></li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Strath Taieri Community Board	1029	Support submission 278 ref. 128		• No reason given.
Glenshee Station Limited	1062	Support in part submission 278 ref. 128		<ul style="list-style-type: none"> <li>• Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>• Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 278 ref. 128		<ul style="list-style-type: none"> <li>• Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</li> <li>• Effects-based approach should allow for discharges that exceed Schedule 16 limits.</li> </ul>
Fish and Game (Otago)	287	Support	Retain as is.	• Happy with Schedule as it stands.
Craiglea Limited	1012	Oppose submission 287 ref. 128		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> <li>• Affected by a variety of activities, not just agricultural uses.</li> <li>• Imposes unnecessary constraints on farming practices.</li> </ul>
Meridian Energy Limited	1014	Oppose submission 287 ref. 128		<ul style="list-style-type: none"> <li>• Discharge limits not based on the best available information, and scientific and socio-economic knowledge.</li> <li>• Schedules inconsistent with NPSFW and RMA.</li> </ul>
Mr RJ Borst	1034	Oppose submission 287 ref. 128		<ul style="list-style-type: none"> <li>• Unnecessary constraints on farming practices.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
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Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Alliance Group Limited	1060	Oppose submission 287 ref. 128		<ul style="list-style-type: none"> <li>• Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 287 ref. 128		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Beaton Family	291	Did not specify	Seeks clarification on the following: - Shouldn't areas of similar farming use have the same standards	<ul style="list-style-type: none"> <li>• The lower Taieri plains have a farming intensity compatible with areas of the Lower Clutha but have a different type of classification. The flat areas around</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			proposed? - Which of these standards must we comply with?	Benhar are also designated different from the areas across the river. • Tables are not all in same units. • Unclear which standards we need to comply with.
Janefield Farm	296	Amend	That Council increases the lead in times for the adoption of Schedule 15 and 16 and ensure that the standards are realistic and achievable.	• Believe best practice won't meet requirements. • Far reaching effects on future viability of farming. • How can ORC propose change without knowing impact on sector?
<i>Albert McTainsh</i>	<i>1004</i>	<i>Support submission 296 ref. 128</i>		• <i>Provides science-based, workable and practical suggestions.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 296 ref. 128</i>		• <i>Must be amendments to limits and transition times.</i> • <i>Must be stronger links between discharge compliance and environmental improvements.</i> • <i>Needs to be more science informed decision making.</i>
Clydevale Dairy Farms Ltd	297	Oppose	Delete schedule or identify more practical and justifiable limits.	• Limits unnecessarily restrictive; no reasons given for limits and how applied. • Limits have no mixing option as a mitigation method, as RMA, NPS and RPS provide for. Approach has no justification. • Uncertain what happens if Schedule not complied with. Providing temporary consents only, while steps taken to reach standards, do not recognise circumstances where other effects or impacts outweigh effects of allowing discharge.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 297 ref. 128</i>		• <i>Must be amendments to limits and transition times.</i> • <i>Must be stronger links between discharge compliance and environmental improvements.</i> • <i>Needs to be more science informed decision making.</i>
Greenfield Farming Ltd	298	Oppose	Delete schedule or identify more practical and justifiable limits.	• Limits unnecessarily restrictive; no reasons given for limits and how applied. • Limits have no mixing option as a mitigation method, as RMA, NPS and RPS provide for. Approach has no justification. • Uncertain what happens if Schedule not complied with. Providing temporary consents only, while steps taken to reach standards, do not recognise circumstances where other effects or impacts outweigh effects of allowing discharge.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 298 ref. 128</i>		• <i>Must be amendments to limits and transition times.</i> • <i>Must be stronger links between discharge compliance and environmental improvements.</i> • <i>Needs to be more science informed decision making.</i>
Big River Dairy Limited	299	Oppose	Delete schedule or identify more practical and justifiable limits.	• Limits unnecessarily restrictive; no reasons given for limits and how applied. • Limits have no mixing option as a mitigation method, as RMA, NPS and RPS provide for. Approach has no justification. • Uncertain what happens if Schedule not complied with. Providing temporary consents only, while steps taken to reach standards, do not recognise circumstances where other effects or impacts outweigh effects of allowing discharge.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 299 ref. 128</i>		• <i>Must be amendments to limits and transition times.</i> • <i>Must be stronger links between discharge compliance and environmental improvements.</i> • <i>Needs to be more science informed decision making.</i>
Philip, Heather & Geoff Wilson	304	Oppose	Unfair to strike standards that the community as a whole cannot meet.	• Mosgiel discharging stormwater and sewage into the Silverstream, in times of heavy rain, so unfair to strike these standards
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 304 ref. 128</i>		• <i>Amend limits and transition times.</i> • <i>Must be stronger links between discharge compliance and environmental improvements.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Andrea Clarke	305	Amend	Identify the number of different catchments within the Otago region all with differing triggers.	<ul style="list-style-type: none"> <li>• <i>Needs to be more science informed decision making.</i></li> <li>• Important to set realistic and appropriate limits to the geographical characteristics of Otago.</li> <li>• Understanding soil systems and nutrient movement, limits achievement of proposed levels of contaminants within timeframe.</li> <li>• Appropriate for ORC to identify the different contaminants that result in decreasing water quality.</li> <li>• Specific limits will maintain existing quality where good or reasonable and help improve where quality poor.</li> <li>• Potential difficulty in identifying individual land use activities that exceed limits - need tools.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 305 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Must be amendments to limits and transition times.</i></li> <li>• <i>Must be stronger links between discharge compliance and environmental improvements.</i></li> <li>• <i>Needs to be more science informed decision making.</i></li> </ul>
The Director-General of Conservation	306	Amend	All portion of any catchments listed in Schedule 16, Discharge Limit Area 1 above 800m asl are listed in Discharge Limit Area 2.	<ul style="list-style-type: none"> <li>• Higher portions of catchments in Otago have better quality than lower sections.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>No evidence from environmental impacts from agricultural activities.</i></li> <li>• <i>Changes are vague, unclear and open-ended.</i></li> <li>• <i>No need on further restrictions on discharges.</i></li> </ul>
<i>Hopfield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Would impact on farming operation.</i></li> <li>• <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li>• <i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050	<i>Oppose submission 306</i>		<ul style="list-style-type: none"> <li>• <i>Very wide changes sought without evidence of environmental impact, including land management practice.</i></li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052			
<i>Hawkdun Station</i>	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 128</i>		<ul style="list-style-type: none"> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• Inconsistency with RMA Part II.</li> <li>• Extends beyond scope of plan change.</li> <li>• Will impact farming given lack of environmental issues.</li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	<i>1077</i>	<i>Oppose submission 306 ref. 128</i>		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>
<i>Central Otago District Council &amp; Clutha District Council</i>	<i>309</i>	<i>Amend</i>	<i>The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur.</i>	<ul style="list-style-type: none"> <li>• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing.</li> <li>• Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged.</li> <li>• No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary.</li> <li>• Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.</li> </ul>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support submission 309 ref. 128</i>		<ul style="list-style-type: none"> <li>• Reasons stated in the submission.</li> </ul>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 309 ref. 128</i>		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 309 ref. 128</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support in part submission 309 ref. 128</i>		<ul style="list-style-type: none"> <li>• Supports provision of reasonable mixing zone.</li> </ul>
<i>Central Otago Wine Growers</i>	<i>1054</i>	<i>Support</i>		<ul style="list-style-type: none"> <li>• Agree schedules 15 and 16 need to be based on environmental effects and</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Association		submission 309 ref. 128		science. • Agree objective and policy framework do not support inclusion of the scheduled limits.
Federated Farmers of New Zealand	1057	Support submission 309 ref. 128		• Limits difficult to comply with even in "good" catchments. Standards must be achievable. • Needs amendments to limits and increase in transition times. • Inconsistent with RMA.
Alliance Group Limited	1060	Support submission 309 ref. 128		• Alliance seeks that any discharge limits in the plan are consistent with achieving sustainable management and are not based on a singular ecological or environmental premise, for the reasons in its original submission.
The NZ Transport Agency	1073	Support submission 309 ref. 128		• Seek that the submission be allowed and the Plan Change amended as per the submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 309 ref. 128		• Clarification required to references of "good quality water" and "natural and human use values", particularly that this includes farming and related rural activities. • Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.
Glen Dene Limited	310	Amend	The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur.	• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
Federated Farmers of New Zealand	1057	Support submission 310 ref. 128		• Limits difficult to comply with even in "good" catchments. Standards must be achievable. • Needs amendments to limits and increase in transition times. • Process unclear where limits can't be reached or other impacts outweigh effects of discharge.
Ben Graham	311	Amend	The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur.  Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.	• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Federated Farmers of New Zealand	1057	Support submissions 311 - 313 ref. 128		• Limits difficult to comply with even in "good" catchments. Standards must be achievable. • Needs amendments to limits and increase in transition times.
Greer Farms Partnerships	314	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.	• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				necessary. <ul style="list-style-type: none"> <li>Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 314 ref. 128</i>		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments. Standards must be achievable.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.  Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> <li>Limits are restrictive, and exacerbated by removal of provision for reasonable mixing.</li> <li>Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged.</li> <li>No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary.</li> <li>Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.</li> </ul>
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 315 - 321 ref. 128</i>		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments. Standards must be achievable.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
Robert Borst	322	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.  Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.  The timeframes for compliance should also reflect scientific analysis.	<ul style="list-style-type: none"> <li>Limits are restrictive, and exacerbated by removal of provision for reasonable mixing.</li> <li>Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged.</li> <li>No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary.</li> <li>Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.</li> <li>Not clear why the compliance dates have been selected and whether they relate to scientific analysis. Concerned the dates are arbitrary and compliance will be unachievable.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 322 ref. 128</i>		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments. Standards must be achievable.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
Dunedin International Airport Limited	323	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.  Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> <li>Limits are restrictive, and exacerbated by removal of provision for reasonable mixing.</li> <li>Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged.</li> <li>No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary.</li> <li>Unclear process where the limits can not be reached to other effects or impacts outweigh actual or potential effects of allowing the discharge.</li> </ul>
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 323 - 326 ref. 128</i>		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments. Standards must be achievable.</li> <li>Needs amendments to limits and increase in transition times.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 128</i>		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Peter Rowland	328	Amend	Reassess the levels set in Schedule 16 to ensure that they are practical and achievable levels.	<ul style="list-style-type: none"> <li>Levels are not achievable and need reassessing.</li> </ul>
Alastair Cocks	334	Amend	Any standards set must be fair and achievable.	<ul style="list-style-type: none"> <li>Some standards unable to be met, in part due to natural turbidity of waterways within property.</li> <li>Support the maintenance of the environment and clean waterways, and our farming practices aim to achieve that.</li> <li>Proposed changes could severely compromise ability to farm unless the right balance is achieved.</li> <li>Short notice (received flyer in mail the day submissions were due) and pressure of seasonal work obstacle to preparing a submission.</li> <li>Need more time to gather information on impact of proposed levels for various nutrients.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 334 ref. 128</i>		<ul style="list-style-type: none"> <li>Limits difficult to comply with even in "good" catchments.</li> <li>Standards must be achievable.</li> <li>Needs amendment to limits and increase in transition times.</li> </ul>

### 130 Fertiliser - Glossary definition

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
New Zealand Pork Industry Board	145	Amend	Amend as follows: "Fertiliser - Any proprietary substance specifically manufactured for use in increasing the nutrient status of land. Excludes effluent or seaweed."	<ul style="list-style-type: none"> <li>Remove compost as it is a treated product used to increase nutrient status of land.</li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Opposes the current definition of fertiliser and seeks it to be replaced with the following definition (see submission for wording) which is better aligned to the definition used in the regulations of the Agricultural and Veterinary Medicines Act, Code of Practice for the Sale of Fertilisers and Code of Practice for Nutrient Management.	<ul style="list-style-type: none"> <li>To ensure national consistency in terms and definitions.</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc	252			
Ballance Agri-Nutrients Ltd	262			
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submissions 248, 252 &amp; 262 ref. 130</i>		<ul style="list-style-type: none"> <li>No stated reason.</li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>			
<i>Central Otago District Council</i>	<i>1051</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 252 and 262 ref. 130</i>		• <i>More consistent with other legislation and Codes of Practice, more relevant.</i>
Horticulture New Zealand	269	Amend	Amend definition of fertiliser to read: "Any substance (whether solid or fluid in form) which is described as or held out to be for, or suitable for, sustaining or increasing the growth, productivity, or quality of plants or animals through the application of essential nutrients to plants or soils."	• Should be consistent with the Code of Practice for Nutrient Management.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 130</i>		• <i>More consistent with other legislation and Codes of Practice, more relevant.</i>
Federated Farmers of New Zealand	278	Amend	Replace with the following definition: "Fertiliser - a) means a substance or biological compound or mix of substances or biological compounds that is described as, or held out to be suitable for, sustaining or increasing the growth, productivity, or quality of plants or, indirectly, animals through the application to plants or soil of - i) nitrogen, phosphorus, potassium, sulphur, magnesium, calcium, chlorine, and sodium as major nutrients; or ii) manganese, iron, zinc, copper, boron, cobalt, molybdenum, iodine, and selenium as minor nutrients; or iii) fertiliser additives; and b) includes nonnutrient attributes of the materials used in fertiliser; but c) does not include substances that are plant growth regulators that modify the physiological functions of plants"	• Aligned to definition used in regulations of the Agricultural and Veterinary Medicines Act, Code of Practice for the Sale of Fertilisers, and Code of Practice of Nutrient Management.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 130</i>		• <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 130</i>		• <i>Operation relies on natural streams for continuing viability.</i> • <i>Plan change has huge impact on farming business.</i> • <i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 130</i>		• <i>No reason given.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 130</i>		• <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i> • <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 130</i>		• <i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i> • <i>Effects-based approach should allow for discharges that exceed Schedule 16 limits.</i> • <i>Activities should only be prohibited when they have significant adverse environmental effects.</i> • <i>Reliance on one brand of proprietary software (OVERSEER) is overly</i>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>restrictive.</i>

### 131 Minor and consequential changes

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ernslaw One Ltd	149	Amend	Seek such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	• As discussed in other submission points.
Alliance Group Limited	187	Amend	Such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	• As discussed in other submission points.
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 131</i>		• <i>Supports the submission.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	Make any similar amendments with like effect to the relief sought [in this submission].  Make any consequential amendments necessary to give effect to the relief sought [in this submission].	• To give effect to relief sought.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 131</i>		• <i>Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 131</i>		• <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
Trustpower Limited	206	Not Applicable	Such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	• As discussed in other submission points.
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 131</i>		• <i>Supports the relief sought.</i>
M C Holland Farming Ltd	207	Amend	Such other relief as is appropriate to give effect to our submission.	• As discussed in other submission points.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Blakely Pacific Limited	209	Amend	Such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 209 ref. 131</i>		<ul style="list-style-type: none"> <li>Inconsistent with relief sought by further submitter.</li> </ul>
Dunedin City Council	211	Amend	Such other relief as is appropriate to give effect to our submission.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 131</i>		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 131</i>		<ul style="list-style-type: none"> <li>Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> </ul>
Meridian Energy Limited	251	Amend	Any similar or consequential amendments to the Plan Change necessary to give effect to the submission.	<ul style="list-style-type: none"> <li>To give effect to the submission.</li> </ul>
Rayonier New Zealand Ltd	256	Did not specify	Seek such consequential or other relief as may be required to give effect to the submissions discussed.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
North Otago Irrigation Company	260	Amend	Further requests such other deletions amendments or changes as may be needed to give full effect to this submission and the issues raised.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 131</i>		<ul style="list-style-type: none"> <li>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 131</i>		<ul style="list-style-type: none"> <li>Support the NOIC submission in full.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Such similar or consequential relief necessary to give effect to this submission.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
Horticulture New Zealand	269	Not Applicable	Horticulture NZ seeks that consequential changes are made as required to give effect to the changes sought in this submission.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 131</i>		<ul style="list-style-type: none"> <li>Plan change is arbitrary and unworkable, will have substantial adverse impact on horticultural production. Horticulture already has self governing best practice for soil, water and nutrient management.</li> <li>Plan change is inconsistent with the NPSFW.</li> </ul>
Wenita Forest Products	279	Amend	Seek such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
City Forests Limited	283			
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submissions 279 and 283 ref. 131</i>		<ul style="list-style-type: none"> <li>Agree with submission in relation to Objectives and policies.</li> <li>Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules.</li> <li>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>Matters relating to reasonable mixing need to be reconsidered.</li> <li>Rules relating to bed disturbance for crossing installation require amendment.</li> <li>Schedule 15 requires amendment.</li> </ul>
Oceana Gold (New Zealand) Limited	285	Not Applicable	[Seeks any] other relief that gives effect to the concerns raised by OceanaGold.	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>
Fish and Game (Otago)	287	Not Applicable	For the avoidance of doubt, seeks the general relief of any additional or consequential changes to provisions that give effect to	<ul style="list-style-type: none"> <li>As discussed in other submission points.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			the concerns raised.	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 131</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 131</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 131</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Southern Wood Council	289	Amend	Seek such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	• As discussed in other submission points.
The Director-General of Conservation	306	Amend	That any consequential amendments to the Plan required to explain or give effect to these changes be made.	• As discussed in other submission points.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 131</i>		<ul style="list-style-type: none"> <li>• <i>No evidence from environmental impacts from agricultural activities.</i></li> <li>• <i>Changes are vague, unclear and open-ended.</i></li> <li>• <i>No need for further restrictions on discharges.</i></li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 131</i>		<ul style="list-style-type: none"> <li>• <i>Would impact on farming operation.</i></li> <li>• <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i></li> <li>• <i>Costs of the proposed changes outweigh the benefits.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 131</i>		• <i>No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 131</i>		<ul style="list-style-type: none"> <li>• <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited Hawkdun Station	1052 1053	Oppose submission 306 ref. 131		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 131		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 131		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 131		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 131		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</li> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>

### 132 I series maps

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Foxhaven Farms Ltd	135	Amend	[If Rule 12.C.1.3 not deleted] That Foxhaven Farms is removed from the sensitive N zone on the relevant planning maps [1 Kakanui-Kauru Aquifer].	<ul style="list-style-type: none"> <li>• Property is in nitrogen sensitive zone in unrealistic way - farm is allowed 10 kg but 1m over boundary is permitted 30 kg.</li> <li>• Unclear how margins and limits were developed as theoretically property is in</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				10 and 30kg zones.
Dairy NZ Limited	146	Oppose	Withdraw Maps I1-I6 associated with Rule 12.C.1.3.	<ul style="list-style-type: none"> <li>Insufficient analysis on proposed zone boundaries.</li> <li>Map resolution not sufficient</li> <li>Map must be of detail so stakeholder knows where rule applies.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 146 ref. 132</i>		<ul style="list-style-type: none"> <li>Maps assist in Plan Change giving effect to RMA.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 132</i>		<ul style="list-style-type: none"> <li>Need greater analysis of proposed zone boundaries, ensure decisions scientifically based.</li> </ul>
Nigel de Geest	157	Did not specify	Would like to see more clarification and information on what methods were used to achieve what appears to be inconsistency within these zones [I1 Kakanui-Kauru Aquifer].	<ul style="list-style-type: none"> <li>On the map the submitter's property located above the aquifer, while land next door with identical make-up isn't.</li> </ul>
Fulton Hogan Limited	222	Amend	Improve the resolution of the planning maps to ensure it can easily be determined where the water quality areas are.	<ul style="list-style-type: none"> <li>Resolution of maps is too low.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 222 ref. 132</i>		<ul style="list-style-type: none"> <li>Importance of maps being easily interpreted, ease of use results in greater accuracy.</li> </ul>
Holcim (New Zealand) Limited	224	Amend	Improve the resolution of the planning maps to ensure it can easily be determined where the water quality areas are.	<ul style="list-style-type: none"> <li>Resolution of maps is too low.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 224 ref. 132</i>		<ul style="list-style-type: none"> <li>Importance of maps being easily interpreted, ease of use results in greater accuracy.</li> </ul>
Preserve Our Water Society Inc	225	Amend	More information on Lakes Area maps [I-6].	<ul style="list-style-type: none"> <li>Nitrogen sensitive area should be expanded to include source area of the water which feeds back area of Hawea aquifer.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 225 ref. 132</i>		<ul style="list-style-type: none"> <li>No scientific justification, lack of link between limit and environmental benefit.</li> </ul>
John Newlands Farming Company	228	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>Water quality in aquifer is affected by all land uses but map places all risk and responsibility on land owners north of Gemmel's Crossing Road [I1 Kakanui-Kauru Aquifer].</li> </ul>
Fonterra Co-operative Group Limited	241	Oppose	Withdraw Maps I1-I6 associated with Rule 12.C.1.3.	<ul style="list-style-type: none"> <li>Insufficient analysis on proposed zone boundaries.</li> <li>Map resolution not sufficient</li> <li>Map must be of detail so stakeholder knows where rule applies.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 132</i>		<ul style="list-style-type: none"> <li>Maps are of sufficient detail and include all sensitive zones and all aquifers, they identify zones and set appropriate limits.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 241 ref. 132</i>		<ul style="list-style-type: none"> <li>Supports collaborative approach.</li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 241 ref. 132</i>		<ul style="list-style-type: none"> <li>Maps are of sufficient detail.</li> <li>They include all sensitive zones and all aquifers.</li> <li>They identify zones and set appropriate limits.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 132</i>		<ul style="list-style-type: none"> <li>Need greater collaboration, technical robustness and clarity.</li> <li>No scientific justification for limit, lack of link between limit and environmental benefit.</li> </ul>

### 139 J series maps

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Korteweg Family Trust	142	Amend	Alter to include correct boundaries (line which follows the road from the Railway Bridge along the Kaitangata highway, turning left onto Storer Road and right onto Lakeside Road to Kaitangata).	<ul style="list-style-type: none"> <li>Map leaves out the Delta land on the northern side of the Clutha River between Clutha Railway bridge to Kaitangata.</li> <li>Area is of the same soil type and farmed in the same way as its neighbouring delta land on Inch Clutha and Paretai.</li> <li>Line proposed is used by the Animal Health Board.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 142 ref. 139</i>		<ul style="list-style-type: none"> <li><i>More appropriate reflection of soil types, in line with AHB boundaries.</i></li> </ul>
Dairy NZ Limited	146	Oppose	Maps associated with Schedule 16 should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> <li>Resolution inadequate for stakeholders to know where discharge limit area.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 146 ref. 139</i>		<ul style="list-style-type: none"> <li><i>Plan Change process provides for the "working through" of these matters.</i></li> </ul>
Fulton Hogan Limited	222	Amend	Improve the resolution of the planning maps to ensure it can easily be determined where the water quality areas are.	<ul style="list-style-type: none"> <li>Resolution of maps is too low.</li> </ul>
Holcim (New Zealand) Limited	224			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 222 and 224 ref. 139</i>		<ul style="list-style-type: none"> <li><i>Importance of maps being easily interpreted, ease of use results in greater accuracy.</i></li> </ul>
Fonterra Co-operative Group Limited	241	Oppose	Maps associated with Schedule 16 should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> <li>Resolution inadequate for stakeholders to know where discharge limit area.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 139</i>		<ul style="list-style-type: none"> <li><i>Schedule 16 and associated J series maps essential to maintain and improve water quality.</i></li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 241 ref. 139</i>		<ul style="list-style-type: none"> <li><i>Supports collaborative approach.</i></li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 241 ref. 139</i>		<ul style="list-style-type: none"> <li><i>Schedule 16 and associated maps are essential to maintain and improve water quality.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 139</i>		<ul style="list-style-type: none"> <li><i>Need greater collaboration, technical robustness and clarity.</i></li> <li><i>No scientific justification for limit, lack of link between limit and environmental benefit.</i></li> </ul>

### 201 Whole plan change (general support)

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Helen Constance	2	Support	Aim for good quality water in Otago.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 2 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
David Wharton	3	Support	To pass the proposal.	<ul style="list-style-type: none"> <li>Improve water quality.</li> <li>Control effects of agricultural runoff and stock management.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 3 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Kelvin Milne	13	Support	Support tougher rules on wastewater.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 13 ref. 201</i>		<i>specific areas. As such opposes implementation of the plan change in its current form.</i>
Mrs I Green	14	Support	This proposal, if designed to improve water quality, should stand as it is.	<ul style="list-style-type: none"> <li>Reduce health risks and degradation of waterways.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 14 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Kaye Kearney	16	Support	Implement the plan change.	<ul style="list-style-type: none"> <li>Needs to take place now.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 16 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
J Starke	17	Support	ORC to go ahead with their submission.	<ul style="list-style-type: none"> <li>Supply quality water.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 17 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
F R & R Penny	19	Support	In favour of all moves to the delivery to our homes of fresh clean water.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 19 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Zoe Mitchell	21	Support	Any change that reduces/tightens rules for discharge of contaminants etc into our waterways is a positive change.	<ul style="list-style-type: none"> <li>Need stricter rules on what seeps into rivers.</li> <li>Positive effect on water quality.</li> <li>Drinkable freshwater.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 21 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
J H Manley	22	Support	Proposed Plan Change 6A should proceed.	<ul style="list-style-type: none"> <li>Important to keep the waterways clean.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 22 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Tami and Jason Sargeant	24	Support	Support the proposed plan change.	<ul style="list-style-type: none"> <li>Protect waterways for recreational purposes.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 24 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Lydia Edwards	25	Support	To maintain water quality, improve it through control of contaminants discharging from land to water. That ORC support the proposed plan change.	<ul style="list-style-type: none"> <li>Supports amendment of provisions for river and lake beds, and streamlining.</li> <li>For good quality water.</li> <li>Reduce effects of discharges.</li> <li>Landholders will need to pay costs.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 25 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Jeanette Spooner	32	Support	Add support for the aim to have good water quality.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 32 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Lynne Hill	35	Support	Encourage the ORC in any decisions which would reverse the decline in water quality seen over the past ten years.	<ul style="list-style-type: none"> <li>Water is valuable resource.</li> <li>Intensive farming linked to declining water quality.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 35 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Wayne & Billee Marsh	37	Support	Support Proposed Plan Change 6A. We seek the adoption of	<ul style="list-style-type: none"> <li>Proposed Tarras Irrigation Scheme will bring intensive farming to our area.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Proposed Plan Change 6A by the ORC.	<ul style="list-style-type: none"> <li>Farming practices not acceptable if pollute aquifers and waterways.</li> <li>New Zealanders expect higher standards of environmental management.</li> <li>Regulate farming and industrial practices to keep waterways and aquifers pollution free.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 37 ref. 201</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Alan G Cone & Judy Bagrie	38	Support	Just get it done would be great.	<ul style="list-style-type: none"> <li>Continued build up of algae in Lake Wanaka.</li> <li>Rapid build up of livestock numbers in Lakes catchments.</li> <li>Stock number build up closely linked with fertiliser application.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 38 ref. 201</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Steve Hayward	44	Support	Implement the change 6A Water Quality. Action must be taken (and enforced) as soon as possible.	<ul style="list-style-type: none"> <li>Water quality throughout Otago and NZ is declining rapidly.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 44 ref. 201</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Des Boyes	47	Support	Legislation to protect it [water quality] is good.	<ul style="list-style-type: none"> <li>Water quality is very important.</li> <li>Importance of vegetation.</li> <li>Rainfall is declining.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 47 ref. 201</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Melvyn Hollis	53	Support	Support of all methods which the ORC can introduce to improve the water quality of our rivers, streams, lakes and wetland areas.	<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 53 ref. 201</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
H F Adams	55	Support	Supports the general thrust of the plan change. Stock must be kept from all streams, rivers, etc. Effluent disposal that is raw needs to be strictly monitored.	<ul style="list-style-type: none"> <li>In pork industry two settling ponds were not enough, four were needed</li> <li>Those with "honey wagons" needed to leave a cover to avoid run-off.</li> <li>A new piggery in Invercargill with latest equipment was forced to close as was polluting river.</li> <li>Wilding pines should be left to grow and improve water quality and reduce scree movement.</li> <li>A positive partnership approach be used to implement plan.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 55 ref. 201</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
River-Estuary Care: Waikouaiti-Karitane	79	Support	In general supports Plan Change 6A.	<ul style="list-style-type: none"> <li>Positive change to better ensure protection of Otago waterways.</li> <li>May allow for new innovative methods beyond the previously regulated ones.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 79 ref. 201</i>		<i>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 79 ref. 201</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Roger Fox	82	Support	This is generally a good plan but have issues with the [points raised in this submission].	<ul style="list-style-type: none"> <li>See other submission points.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 82</i>		<i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its</i>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 201</i>		<i>current form.</i>
Paul Corboy	94	Support	Support most of the main points of the Plan Change.	• No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 94 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
David Botting	97	Support	On the whole support the Plan.	• Innovative approach. • Sediment runoff to waterways.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 97 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Clive Blumden	99	Support	Agree with anything to do with cleaning up the waterways and rivers of our region.	• No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 99 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Teviot Irrigation Company Limited	114	Support	Generally supports the approach on the proposed plan change.	• No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 114 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Hawea Community Association	126	Support	Hawea community supports the proposed plan change.	• Gives effect to the water quality strategy and requires active management of water. • Controlling pollution and allocation imperative to maintaining water quality and quantity.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 126 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
W L Hamilton	144	Support	Support Plan Change 6A with suggested amendments to 12.C.1.3 (i) - reference to latest version of Overseer- and (i)(b) - reference to 40kg Nitrogen/ha/yr.	• No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 144 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Dean McNeilly	150	Support	Support the Otago Regional Council's proposed rules which set standards controlling nitrogen, phosphorus, bacteria and sediment released from rural drains and through runoff and leaching.	• Concerned about deteriorating water quality. • Regularly observes Clutha district waterways and rural land management practices.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 150 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
Tony Hughes	170	Support	Support all the rules and want the ORC to get on and implement them.	• Better to have some rules in place for everybody to work with, rather than current situation where everybody has a different interpretation of what needs doing.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 170 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
J R Hill	178	Support	Generally support the approach taken by the Otago Regional Council.	• No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 178 ref. 201</i>		• <i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i>
John Barlow	198	Support	Strongly support the overarching idea of an effects based plan as it is proposed.	• If it works could become template for how water and land interrelationship is managed NZ wide.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 198 ref. 201</i>		<ul style="list-style-type: none"> <li>The plan does not cover activities that are totally unsuited to the land type.</li> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Dougal Rillstone	201	Support	Support the intent and philosophy underpinning the draft plan change. Would strongly resist any dilution of the thrust of the plan change, or any weakening of the protective measures proposed.	<ul style="list-style-type: none"> <li>Likes the manner in which the Council is addressing water quality.</li> <li>Enjoy use of water as angler.</li> <li>Wider amenity values.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 201 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Vivienne & Greg Kerr	213	Support	Support in general the implementation of the regulatory framework as described in the Rural Water Quality Strategy to set maximum discharge limits, into Otago water bodies, for nitrogen, phosphorus, E. Coli, and sediment.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 213 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 213 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Does not give flexibility to existing farming operations.</i></li> <li><i>Overly restrictive and disproportionate.</i></li> <li><i>Does not take into account economic considerations.</i></li> </ul>
Medical Students For Global Awareness	227	Support	Put the plan through with no changes, or, if possible form a more comprehensive plan which will help both enforce and support the changes in farming practices required to promote clean, unpolluted waterways.	<ul style="list-style-type: none"> <li>Water quality is paramount for a sustainable, healthy future for all New Zealanders.</li> <li>Ability to swim, gather food, enjoy our waterways plays a big role in the NZ lifestyle.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 227 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Dulce-Domum Trust	235	Support	Supports the concepts of water quality improvement.	<ul style="list-style-type: none"> <li>Apart from Rule 12.C.1.3.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 235 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Otago Rock Lobster Industry Organisation	243	Support	Strongly support the introduction of Plan Change 6A to bring into effect the NPSFW.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 243 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 243 ref. 201</i>		<ul style="list-style-type: none"> <li><i>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</i></li> </ul>
Federated Farmers of New Zealand	278	Amend	Supports the plan change in part, but only if council adopt significant changes. If these changes are not adopted, opposes the plan change.	<ul style="list-style-type: none"> <li>Linkage between water quality cause and effect should be evidence-based.</li> <li>Water quality issues should not be justification for determining or controlling land use.</li> <li>Policy should be based on a science-informed, risk priority framework.</li> <li>Implementation, compliance and monitoring should be cost effective.</li> <li>Implementation should be flexible enough to adapt to each farm.</li> <li>Policy should empower and encourage self-responsibility, adaptive management and innovation.</li> <li>Plan should provide certainty to encourage long-term, on-farm decision making and planning.</li> <li>Section 32 analysis not comprehensive enough, doesn't provide enough information to gauge environmental or financial implications, or sufficient</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				justification for adopted approach. <ul style="list-style-type: none"> <li>No Section 32 analysis of how the regime may be put into practice, no data or scenarios given, or cases or models presented, thus no certainty.</li> <li>No detailed Section 32 analysis of other methods.</li> </ul>
<i>Teviotdowns Ltd</i>	1001	<i>Support submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Support plan change if significant amendments adopted as per Federated Farmers' reasons, otherwise oppose the plan change.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Practical and workable alternatives, solutions and suggestions.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Practical and workable alternatives, solutions and suggestions.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Submitted plan changes will not achieve the appropriate water quality targets and the NPSFW requirements.</li> </ul>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Operation relies on natural streams for continuing viability.</li> <li>Plan change has huge impact on farming business.</li> <li>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</li> <li>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 201</i>		<ul style="list-style-type: none"> <li>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</li> <li>Effects-based approach should allow for discharges that exceed Schedule 16 limits.</li> <li>Activities should only be prohibited when they have significant adverse environmental effects.</li> <li>Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</li> </ul>
Dugald MacTavish	294	Support	Generally support the proposed plan change but consider some aspects may warrant further consideration.	<ul style="list-style-type: none"> <li>Section 32 sets out well options available and reasoning.</li> <li>Proposes clear delineations and timelines for achieving targets.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 294 ref. 201</i>		<ul style="list-style-type: none"> <li>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</li> </ul>
Lake Edge Farms Ltd	333	Support	Support in part Plan Change 6A	<ul style="list-style-type: none"> <li>Water in Otago is getting worse and something needs to be done but with better timeframe and incentives.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose in part submission 333 ref. 201</i>		<ul style="list-style-type: none"> <li>Silver Fern Farms submitted on a number of issues as a whole and on some specific areas. As such opposes implementation of the plan change in its current form.</li> </ul>

## 202 Whole plan change (general opposition)

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Jim Oliver	18	Oppose	The ORC just keep on policing water, and runoffs, as they are doing.	<ul style="list-style-type: none"> <li>Any change would involve more cost.</li> </ul>
Patrick Alexander McGettigan	34	Oppose	Rule should say that when farms are being converted to different practices the owners need to apply for a resource consent.	<ul style="list-style-type: none"> <li>Ensure land is suitable for new practices.</li> <li>Current focus on symptoms, not cause.</li> <li>Deterioration in water quality over last ten years.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 34 ref. 202</i>		<ul style="list-style-type: none"> <li><i>Opposes land use rules.</i></li> <li><i>Unnecessarily restrictive.</i></li> <li><i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
G & S Geddes	50	Oppose	Oppose the whole format in the current form.	<ul style="list-style-type: none"> <li>Website a minefield, hard to get information pertaining to farming situation.</li> <li>Not enough discussion with those affected.</li> <li>How do you plan to police change and have it remain workable for farming in future?</li> </ul>
Eric Hopgood	74	Oppose	Oppose the proposed plan change in general.	<ul style="list-style-type: none"> <li>Current Water Plan more than adequate to protect water quality.</li> <li>Farmers don't want any more punitive rules and regulations placed on them.</li> </ul>
Cross Family Trusts	77	Oppose	Oppose Plan Change 6A.	<ul style="list-style-type: none"> <li>Proposed timeframe for change places inequitable financial burden upon pastoral farmers.</li> <li>Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources.</li> <li>If significant financial assistance is not provided, proposed measures will devalue Council's primary sector rating base value and inhibit development and enhancement of the region's resources.</li> </ul>
Jeff & Alison Thompson	78	Oppose	Oppose the changes to plan change 6A (water quality).	<ul style="list-style-type: none"> <li>Timeframes for implementation.</li> <li>Small capture dams should be permitted.</li> <li>Removal of mixing zones.</li> <li>Issues relating to the natural mixing of spring and surface water.</li> <li>Permitted levels of contaminants should be increased.</li> </ul>
Paul Crawford	80	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>Local government making farming harder and harder.</li> <li>Farmers want to look after the land so that their children can take over.</li> <li>Pleased that ORC has not been unreasonable and rurally challenged like other councils.</li> <li>Need to be looking at ways of increasing protein production off the land for NZ's economy while continuing to be environmentally aware.</li> </ul>
N G Trevathan & M A Trevathan	86	Oppose	Where land use remains the same landholders are not required to be involved with unnecessary paper shuffling.	<ul style="list-style-type: none"> <li>If no evidence water degrading from existing practice, it is a waste of land owners' time and expense.</li> </ul>
Graham A Keep	108	Oppose	Water quality needs to be maintained without too big an impact on farming.	<ul style="list-style-type: none"> <li>Farming needs to be a viable industry.</li> </ul>
John Oughton	109	Oppose	Leave unchanged.	<ul style="list-style-type: none"> <li>Proposal will seriously impact on land-use in North-Otago and its economy.</li> </ul>
Albert McTainsh	122	Oppose	Oppose in general PPC6A.	<ul style="list-style-type: none"> <li>Plan change not workable</li> <li>Concerned about the impact on farming operation.</li> </ul>
Strathburn Limited	130	Oppose	Site specific rules need to be considered.  Leave the rules as they are for those with good quality water acknowledging our good practices and concentrate your efforts on the areas that are causing issues.	<ul style="list-style-type: none"> <li>The plan change as proposed imposes a unmeasurable standard and lacks balancing of environmental issues with economic, social and cultural issues.</li> <li>Council is trying to fix a problem in some isolated areas by imposition of blanket rules.</li> <li>Some rules are inconsistent with other provisions in plan while others impose extreme cost for insufficient reason.</li> <li>Plan lacks clarity and balance.</li> <li>Unfair without tools or sampling method.</li> <li>If staff worked alongside farmers and understood what we did better rules could be produced.</li> </ul>
The Cow Farm Limited	133	Oppose	That ORC withdraw PC6A until clear, accurate and reliable rules	<ul style="list-style-type: none"> <li>Support intent to improve water quality.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			can be implemented and after appropriate consultation with industry personnel has occurred.	<ul style="list-style-type: none"> <li>Shortcomings are significant, widespread and will potentially undermine entire rural sector.</li> <li>Targets and limits appear arbitrary, onerous, inflexible and unfounded. No supporting evidence produced to support their inclusion, use of a one size fits all approach takes no account of naturally variable environments.</li> <li>Section 32 report lacking in specific scientific data, so rules appear frivolous and lacking in clear and precise thought.</li> <li>Targets should be based on achievable, clear data and achieve the purpose of the RMA.</li> <li>Lack of effective community consultation especially with industry organisations.</li> </ul>
Otago Conservation Board	140	Oppose	Oppose Plan Change 6A in its current form and seek the amendments discussed in submission.	<ul style="list-style-type: none"> <li>PPC6A creates potential for deterioration in water quality in Otago and therefore fails to meet the objectives of NPSFW.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 140 ref. 202</i>		<ul style="list-style-type: none"> <li>Supports intent of the Plan Change.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 140 ref. 202</i>		<ul style="list-style-type: none"> <li>Supports withdrawal of the plan.</li> <li>Agree plan provisions are unclear and complex.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 140 ref. 202</i>		<ul style="list-style-type: none"> <li>Schedule 16 does not take into account local environmental conditions and economic/development consideration.</li> <li>Schedule 16 is disproportionate and overly restrictive.</li> </ul>
M L & P J Lord Family Trust	143	Amend	Oppose the plan change in part. Want Council to rethink the plan change to achieve standards that a first world country desires/deserves, while allowing for the ability to farm in an economically viable manner.	<ul style="list-style-type: none"> <li>Cost of the Plan change may be more than individual farmers and communities can sustain (loss of jobs and production).</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 143 ref. 202</i>		<ul style="list-style-type: none"> <li>Practical alternatives &amp; more workable rules offered.</li> </ul>
Dairy NZ Limited	146	Oppose	Withdraw as soon as possible until a more collaboratively based	<ul style="list-style-type: none"> <li>Uncertain environmental outcomes.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			water quality management plan for Otago is developed and the issues identified in this submission are addressed.	<ul style="list-style-type: none"> <li>• Uncertainty for stakeholders.</li> <li>• Interpretation of the objectives, policies and rules.</li> <li>• Inconsistency with the Regional Policy Statement.</li> <li>• Water quality targets and standards.</li> <li>• Derivation of numerical water quality targets or standards.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 146 ref. 202</i>		<ul style="list-style-type: none"> <li>• Submitted plan changes will not achieve the appropriate water quality targets and the NPSFW requirements.</li> <li>• Months of consultation have already occurred.</li> <li>• Prolonged collaborative approach will cause delays.</li> <li>• Implementation of practices urgently needed to maintain and upgrade water quality.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 146 ref. 202</i>		<ul style="list-style-type: none"> <li>• Requests for withdrawal and more collaborative process similar to the outcome sought by further submitter.</li> </ul>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 146 ref. 202</i>		<ul style="list-style-type: none"> <li>• Withdrawal of the plan change will delay the implementation of the NPS for Fresh Water Management 2011.</li> <li>• It will result in continued deterioration of waterways.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 146 ref. 202</i>		<ul style="list-style-type: none"> <li>• Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support in part submission 146 ref. 202</i>		<ul style="list-style-type: none"> <li>• Support ORC leading a review of the proposed plan, incorporating appropriate community consultation, collaborative stakeholder involvement, resulting in a practical plan that will deliver on all community objectives related to water values.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 202</i>		<ul style="list-style-type: none"> <li>• Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 202</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>• Activities should only be prohibited where they are likely to result in significant adverse effects.</li> <li>• Provision should be made in transitional provisions for resource consents for existing discharges, even where those do not meet the proposed discharge limits.</li> </ul>
Glenshee Station Limited (Marks & Mouat)	148	Oppose	<p>That Plan Change 6A be rejected in its entirety.</p> <p>Without limiting the scope of the submission, the following parts are opposed in particular Objective 7.A.1, Objective 7.A.2, Objective 7.A.2, Objective 7.A.3, Policy 7.B, Policy 7.D, Rule 12.B, Rule 12.C.</p>	<ul style="list-style-type: none"> <li>• Rules are not best method to achieve objectives.</li> <li>• Rules don't allow individuals/communities to manage effects.</li> <li>• Does not recognise on farm solutions i.e. Riparian planting.</li> <li>• Some terms unclear i.e. "natural and human use values"</li> <li>• If to address effects of dairy need to be more clear.</li> <li>• Great expense for compliance to be achieved.</li> <li>• Areas of land no longer able to be utilised.</li> <li>• Plan does not provide for social and economic wellbeing.</li> </ul>
Ernslaw One Ltd	149	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> <li>• Supports intent to address declining water quality.</li> <li>• Doesn't practically allow for primary production operations, such as forestry, to continue operations if permitted rules not met.</li> <li>• If not permitted become prohibited, even if all practicable measures have been taken to mitigate, remedy or avoid effects.</li> <li>• Undertake their operation in accordance with Environmental Code of Practice for Plantation Forestry 2007 (awarded Best Planning Document of the Year by the Resource Management Law Association in 2009).</li> <li>• NZ Forest Owners Association forest road engineering manual due for</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				release in July 2012. Contains best practice and guidance on erosion and sediment control. <ul style="list-style-type: none"> <li>• Maintains their own Environmental Management System.</li> <li>• Without substantial modification, the forestry industry will be required to comply with unrealistic standards, that are not achievable even in undeveloped, pristine catchments.</li> </ul>
Grant Isbister	151	Oppose	Strongly oppose the new Water Quality plans in their current form.	<ul style="list-style-type: none"> <li>• Unachievable for farmers.</li> <li>• Unrealistic nature will have massive detrimental financial impact on farmers, causing negative flow on effect to region.</li> </ul>
Run 248m Ltd	153	Oppose	Oppose the regional water plan proposed plan change 6A and in particular rule 12.C.0.4 and 13.5A.0.1.	<ul style="list-style-type: none"> <li>• Rules are draconian, economically unsound and ill advised.</li> </ul>
Strath Taieri Community Board	164	Oppose	ORC needs to withdraw the plan change and start communicating effectively with landholders as to better means to maintain and improve water quality and in that process consider a variable plan change that considers areas of high water quality have a lower standard of control reflecting current good management practice and consider rules only to be implemented where land use changes are undertaken.	<ul style="list-style-type: none"> <li>• Agree with the general purpose of the plan change, to ensure retention and improvement of high quality water.</li> <li>• Water quality in our area good, unless there is proof of degradation (or potential degradation) then current practices should be considered acceptable, with recognition given to good land managers.</li> <li>• Require farming for social values and infrastructure.</li> <li>• Little environmental gain to mitigate unrealised threat.</li> <li>• Potential long term effects of intensification and/or change of land use to defray expensive fencing costs.</li> <li>• Plan change unclear and subject to strict interpretation.</li> <li>• Imposes too great a burden without balancing social and economic matters.</li> <li>• Water quality measures not easy or realistically measurable.</li> <li>• Some water degradation is from the natural processes of waterways and might not be caused by farming practices.</li> <li>• Unclear as to how water degradation is to be measured.</li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 164 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</i></li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 164 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Support in part in that it requests withdrawal of the plan change, as the changes are unclear and uneconomic for farmers.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	<i>1068</i>	<i>Support in part submission 164 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Support ORC leading a review of the proposed plan, incorporating appropriate community consultation, collaborative stakeholder involvement, resulting in a practical plan that will deliver on all community objectives related to water values.</i></li> </ul>
Alliance Group Limited	187	Oppose	As a first priority, Proposed Plan Change 6A should be withdrawn.	<ul style="list-style-type: none"> <li>• Considerable uncertainty with what is trying to be achieved through the plan change, and its implementation.</li> <li>• Unnecessary complications for its operations, and for other rural industries.</li> <li>• Balance not achieved as required by section 5(2) RMA.</li> <li>• Significant amendments are required should the Plan Change be adopted.</li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 187 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>PC6A is uncertain and unnecessary.</i></li> <li>• <i>Does not balance all relevant aspects under RMA Section 5.</i></li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	<i>Support submission 187 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</i></li> </ul>
Raymond Grant Tisdall	188	Oppose	Plan change risks the very lifestyles and land use that has maintained the water quality in the area.	<ul style="list-style-type: none"> <li>• Local waterways in good condition, existing practices can maintain this.</li> <li>• Imposes greater cost on sheep farming, which has least impact on water quality, and is best suited to our area.</li> <li>• Only the impact on one wellbeing has been considered (out of environmental, social, economic and cultural).</li> <li>• ORC has not sufficiently communicated the effect of the plan change, documentation vague and unclear.</li> <li>• Fencing major work, requires unaffordable water reticulation - little gain as water already high quality.</li> <li>• Fencing will create waterway problems such as overgrowth, blockages, blowing out, erosion.</li> <li>• Fencing will lead to drastic changes in land use - including intensification to cope with costs.</li> <li>• Fencing will impede recreational access to waterways.</li> <li>• The standards are unfair - cannot measure or check them, may be unaware and not at fault for a breach, but still liable.</li> <li>• Plan change has to work for both small and large landholders.</li> <li>• Plan change risks the very lifestyles and land use in area that currently maintain good water quality.</li> <li>• Most properties in my area are farmed in harmony with water plan aspirations.</li> <li>• There are no incentives to improve behaviour, and no reward for those already doing a good job for water quality.</li> </ul>
Rex & Penny Lowery	193	Amend	Want it amended.	<ul style="list-style-type: none"> <li>• Injudicious to sheep farmers.</li> <li>• Excessive, impractical unworkable, would make it unwarrantable to continue farming.</li> </ul>
Dairy Holdings Limited	195	Oppose	Plan change 6A should be withdrawn (or rejected).  Or alternative is that Within the Waitaki area, complying with a total maximum nitrate concentration in groundwater would be far more appropriate and have less adverse economic effects than what has been proposed.	<ul style="list-style-type: none"> <li>• Support intent of effects-based regime, but plan change unduly onerous, unwarranted and unnecessary.</li> <li>• Insufficient clarity, inappropriate level of Council discretion.</li> <li>• 'No mixing' approach is contrary to Section 107 RMA, fails to give effect to RPS policy 6.5.5(c).</li> <li>• Impractical, difficult, onerous, costly measurement/monitoring.</li> <li>• Default prohibited status contrary to good RMA practice.</li> <li>• Inadequate section 32 analysis.</li> <li>• Insufficient technical analyses, nor proof Schedule 15 standards will be achieved by target dates.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Reliance on use of Overseer.</li> <li>• Effect on border-dyking in the Waitaki.</li> <li>• Would undermine water allocations (through the Waitaki Catchment Water Allocation Regional Plan), pushing water currently used in Otago, into Canterbury.</li> </ul>
<i>Lower Waitaki Irrigation Co</i>	1005	<i>Support submission 195 ref. 202</i>		<ul style="list-style-type: none"> <li>• Supports the reference made to Waitaki allocation regional plan re undermining allocations.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 202</i>		<ul style="list-style-type: none"> <li>• Submission outlines concern of further submitter.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 202</i>		<ul style="list-style-type: none"> <li>• Support in part, particularly regarding wider effect of the plan change.</li> <li>• Although it doesn't request total withdrawal the submission recognises lack of specificity of controls and concern for lack of evidence supporting discharge limits, particularly given reliance on prohibited activity status.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 202</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>• Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</li> <li>• Activities should only be prohibited where they are likely to have an adverse effect on the environment.</li> <li>• Reliance on one brand of proprietary software (OVERSEER) is overly restrictive.</li> </ul>
Clyde Dairy Farm Ltd	196	Oppose	It is unjust that Council are adamant in imposing unreasonable laws upon their rate payers.	<ul style="list-style-type: none"> <li>• Plan change has unjust economic and social impact on farmers, and negative flow on effect for whole economy.</li> <li>• Needs better explanation.</li> <li>• Some regulations unworkable.</li> </ul>
Ian Bryant	199	Amend	Plan 6A should be delayed.	<ul style="list-style-type: none"> <li>• Support the effects-based approach, but new technology and tools referred to in ORC Rural Water Strategy not yet available.</li> <li>• Discharge limits unachievable.</li> <li>• Sediment rule open to interpretation.</li> <li>• Queries if heavy metals from highways addressed.</li> <li>• 12 hrs after rain too lenient for steep areas, harder on flat areas.</li> </ul>
Deanne & Steve Amende	205	Oppose	Do not agree on all of Proposed plan Change 6a (Water Quality) that affect Significant Wetlands until a sensible decision is made on the boundaries of our Akatore property.	<ul style="list-style-type: none"> <li>• Submission and hearings on Plan Change 2 seem invalid.</li> <li>• Agree on boundaries before another policy comes out, so know effects on our property.</li> </ul>
Trustpower Limited	206	Oppose	Opposes the Plan Change and has set out the specific relief sought in Appendix C.	<ul style="list-style-type: none"> <li>• Does not promote sustainable management.</li> <li>• Does not recognise unique nature of discharges associated with hydroelectric.</li> <li>• Does not give effect to NPS for Renewable Energy Generation.</li> <li>• Does not promote efficient use, development of resources.</li> <li>• Does not have comprehensible structure.</li> <li>• Did not take into consideration consultation.</li> <li>• Does not represent sound resource management practice.</li> </ul>
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 206 ref. 202</i>		<ul style="list-style-type: none"> <li>• Contrary to the RMA.</li> </ul>
Blakely Pacific Limited	209	Oppose	Make the changes outlined in the submission.	<ul style="list-style-type: none"> <li>• Doesn't practically allow for primary production operations, such as forestry:</li> <li>• Not meeting permitted rules becomes prohibited even if all practicable measures have been taken to mitigate, remedy, or avoid effects.</li> <li>• Plan change will require forestry industry to comply with unrealistic and</li> </ul>

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				unachievable standards.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 209 ref. 202</i>		<i>• Inconsistent with relief sought by further submitter.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 202</i>		<i>• Clarification required to references of 'good quality water' and 'natural and human use values'. • Activities should only be prohibited where they are likely to result in significant adverse effects.</i>
Dunedin City Council	211	Oppose	That a more substantive S32 Analysis is undertaken with adequate consideration of the alternatives, including their costs and benefits.	<ul style="list-style-type: none"> <li>• Fails to provide level of guidance necessary to implement objectives, policies and rules.</li> <li>• Limits are inappropriate and may be unachievable.</li> <li>• Cannot be justified on current information on environmental effects of discharges.</li> <li>• Section 32 does not provide adequate cost benefit analysis or assessment of efficiency and effectiveness of Plan Change. Minimal assessment of the adequacy of provisions of existing plan. Does not address if rigorous enforcement of existing Plan would effectively address the issues. No assessment of social, economic, and cultural effects.</li> <li>• Targets and limits have been set without recognising whether attainable or suitable.</li> <li>• Concerned plan change will not achieve outcomes.</li> <li>• Not consistent with Objective A1 of NPSFW.</li> <li>• Not undertaking core function of RMA by controlling land use (Section 30 (c)).</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 211 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>A more robust Section 32 analysis required to inform the proposed plan change.</i></li> <li>• <i>Proposed prohibited activity rules set idealistic water quality outcomes &amp; do not consider economic and social benefits derived from use of water resource.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 202</i>		<i>• No reason given.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 211 ref. 202</i>		<i>• Costs and benefits not adequately assessed.</i>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.</i></li> <li>• <i>Agree with submissions in relation to discharge rules and prohibited discharges.</i></li> <li>• <i>Agree with submissions in relation to bed disturbance.</i></li> <li>• <i>Schedule 15 requires review.</i></li> <li>• <i>Schedule 16 requires review.</i></li> <li>• <i>Section 32 analysis was inadequate.</i></li> <li>• <i>Prohibitions are overly restrictive and have unintended application due to schedule 16 limits.</i></li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Limits and rules inappropriate and unachievable, can't be justified on current information.</i></li> <li>• <i>Lack of scientific justification and appropriate Section 32 analysis.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Oppose submission 211 ref. 202</i>		<i>• Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms</i>	1074	<i>Support in part submission 211</i>		<i>• Clarification required to references of 'good quality water' and 'natural and human use values'.</i>

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<i>Partnership</i>		<i>ref. 202</i>		<ul style="list-style-type: none"> <li>• Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>• Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> <li>• Activities should only be classified as 'prohibited' where they are likely to result in significant adverse effects.</li> </ul>
Locharburn Grazing Company	217	Oppose	No decision requested.	<ul style="list-style-type: none"> <li>• Farming practicality not been considered.</li> <li>• Little consideration for low impact farming of sheep, beef cattle and deer.</li> <li>• Soil loss has reduced since we direct drill.</li> <li>• Nitrogen fertiliser not used extensively on farm.</li> </ul>
Hamish Anderson	221	Oppose	A delay in the implementation of the plan change until enough work is done to prove that rule changes and limits proposed are workable and achievable without major economic and social disruption to the rural sector.	<ul style="list-style-type: none"> <li>• Needs to be socially and economically sustainable, as well as environmentally.</li> <li>• Can ruin basically a good idea with overly high standards which lead to economic and social decline.</li> </ul>
N Anderson	231	Amend	To amend the plan change to provide for farming practices and activities.	<ul style="list-style-type: none"> <li>• Impacts on farming operation and viability.</li> </ul>
Silver Fern Farms Limited	238	Oppose	In the first instance that the entire Plan Change 6A is withdrawn.  That Plan Change 6A is not implemented and enforced until after due process (submissions and hearing) has been undertaken.	<ul style="list-style-type: none"> <li>• Inconsistency between introduction and actual changes made.</li> <li>• ORC has mislead community as focused on non-point source. Plan includes point source.</li> <li>• Removal of provisions for mixing zones.</li> <li>• Prohibited activities.</li> <li>• Immediate effect given.</li> <li>• Clarification of animal waste system.</li> <li>• Insufficient clarity.</li> <li>• Inadequate section 32 Report.</li> <li>• Insufficient technical analyses.</li> <li>• Limited grounds for immediate implementation of rules.</li> <li>• Need resolution over proposed changes contrary to RMA.</li> <li>• Our consented discharge could be prohibited, would close Fineland operation as no suitable alternatives.</li> <li>• Intent of RMA s86B to protect water bodies in poor state, nothing to indicate Clutha requires immediate action.</li> <li>• Highjacks/bypasses planning process.</li> <li>• Given removal of mixing zones counter to RMA, NPSFW and courts, PC6A so highly flawed it should not be progressed at all, let alone have immediate effect.</li> </ul>
<i>Isa Holdings Ltd</i>	<i>1058</i>	<i>Support in part submission 238 ref. 202</i>		<ul style="list-style-type: none"> <li>• Supports mixing zones being included in the plan.</li> </ul>
Fonterra Co-operative Group Limited	241	Oppose	The plan change is not in its current form, an appropriate mechanism to manage the quality component of the Otago region's water resource and should be modified through appropriate changes as required to address the concerns identified within the DairyNZ submission and this submission.	<ul style="list-style-type: none"> <li>• Does not meet expectations of community involvement in objective setting.</li> <li>• Does not meet expectations of effective and practical implementation.</li> <li>• Does not meet expectations of assessment against and delivery of other community objectives, especially economic outcomes.</li> <li>• No linkage of existing water quality to support blanket region policy.</li> <li>• Lack of effects basis for general N loss limits at broad level.</li> <li>• Moving away from reasonable mixing.</li> <li>• Subjectiveness of narrative water quality standards leaving undue discretion to ORC.</li> <li>• Extensive use of prohibited status.</li> <li>• Impacts on existing, legal higher N loss land uses.</li> <li>• If practical options currently exist to allow land holders to undertake</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				monitoring.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 241 ref. 202</i>		<ul style="list-style-type: none"> <li>• Supports the reasons provided by the submitter</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 202</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>• Consistent with relief sought by further submitter.</li> </ul>
Meridian Energy Limited	251	Amend	<p>Should amendments not be made in accordance with submission that the Plan Change be withdrawn.</p> <p>Undertake a robust S 32 analysis, including scientific and economic assessments, of the proposed permitted activity rules and subsequently amend them so that they are measurable and enforceable.</p>	<ul style="list-style-type: none"> <li>• Report is high level</li> <li>• Doesn't provide robust assessment of standards</li> <li>• Doesn't give due regard to the sustainable management purpose of the RMA.</li> </ul>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 251 ref. 202</i>		<ul style="list-style-type: none"> <li>• S32 report too high level, without robust assessment of standards, and no due regard paid to sustainable management.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 251 ref. 202</i>		<ul style="list-style-type: none"> <li>• Plan Change requires a monitoring and enforcement programme.</li> <li>• Unclear how the discharges will be monitored - This should be clarified.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 251 ref. 202</i>		<ul style="list-style-type: none"> <li>• Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support in part submission 251 ref. 202</i>		<ul style="list-style-type: none"> <li>• Support ORC leading a review of the proposed plan, incorporating appropriate community consultation, collaborative stakeholder involvement, resulting in a practical plan that will deliver on all community objectives related to water values.</li> </ul>
Queenstown Lakes District Council	255	Oppose	<p>Withdraw Plan Change 6a, or</p> <p>Amend as per submission points.</p>	<ul style="list-style-type: none"> <li>• Potentially enable deterioration of Queenstown Lakes district water quality.</li> <li>• Unduly restrict management of water treatment facilities.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 255 ref. 202</i>		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
<i>Clutha District Council</i>	1050	<i>Support in part submission 255 ref. 202</i>		<ul style="list-style-type: none"> <li>• Further clarity is needed.</li> <li>• PC6A should be withdrawn if concerns are not addressed.</li> <li>• Too complex for landowners.</li> <li>• Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects.</li> <li>• Schedule 16 limits should reflect variations in waterbodies.</li> <li>• Schedule 15 standards need to be accurate and targeted.</li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	<i>Support submission 255 ref. 202</i>		<ul style="list-style-type: none"> <li>• Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 255 ref. 202</i>		<ul style="list-style-type: none"> <li>• Recognition Schedules 15 and 16 don't accurately reflects variations between water bodies.</li> <li>• Agreed that allowance for appropriate mixing zones should be included.</li> <li>• Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</li> <li>• Seeks the submission be allowed and the plan change be amended as per the submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being</i>	1074	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• Activities should only be prohibited where they are likely to result in significant</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>partners of the Dairy Farms Partnership</i>		<i>submission 255 ref. 202</i>		<i>adverse effects.</i> <ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Rayonier New Zealand Ltd	256	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> <li>• Supports intent to address declining water quality.</li> <li>• Doesn't practically allow for primary production operations, such as forestry, to continue operations if permitted rules not met.</li> <li>• If not permitted become prohibited, even if all practicable measures have been taken to mitigate, remedy or avoid effects.</li> <li>• Undertake their operation in accordance with Environmental Code of Practice for Plantation Forestry 2007 (awarded Best Planning Document of the Year by the Resource Management Law Association in 2009).</li> <li>• NZ Forest Owners Association forest road engineering manual due for release in July 2012. Contains best practice and guidance on erosion and sediment control.</li> <li>• Maintains their own Environmental Management System.</li> <li>• Without substantial modification, the forestry industry will be required to comply with unrealistic standards, that are not achievable even in undeveloped, pristine catchments.<sup>3</sup></li> </ul>
Waitaki Irrigators Collective Limited	257	Amend	<p>Urge the Council to review the entire Plan and reconsider the process by which the objectives are determined and limits set, as well as the rules which will determine how monitoring and compliance are undertaken.</p> <p>Environmental outcomes should be balanced with the economic, cultural and social consequences of achieving these outcomes.</p>	<ul style="list-style-type: none"> <li>• Support philosophical approach (permitted activity, level of flexibility) but plan has many aspects which are of concern.</li> <li>• Doesn't reflect local values - Strategy allows for sub-regional differences.</li> <li>• Impact on productivity.</li> <li>• NPS states limits should be informed by the best available information and scientific and socio-economic knowledge.</li> <li>• Policies and rules seek to improve quality of all freshwater bodies. Is it necessary for such strict limits when regional water quality mainly good.</li> <li>• Region may not benefit from irrigation fund if reducing stocking rates required to meet discharge limits.</li> <li>• Changes required to meet discharge limits very expensive.</li> <li>• Affected stakeholders informed robust consultation would be undertaken, did not occur.</li> </ul>
LAC Property Trust	258	Oppose	That the present draft of PC6A be rejected or withdrawn.	<ul style="list-style-type: none"> <li>• Plan change is inconsistent with RMA, NPSFW, and RPS, and contrary to sound resource management practice.</li> <li>• Matters other than water quality not considered - e.g. economic and social wellbeing.</li> <li>• Objectives do not address all values water has (outlined in NPSFW).</li> <li>• Removal of "offensive, objectionable or conspicuous odours" inconsistent with RMA, inappropriately broadens rules.</li> <li>• Rules are not clear or certain, ascertaining compliance is impossible, uncertain rules are unlawful.</li> <li>• Rules do not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work - inconsistent with s 107 of the RMA.</li> <li>• Section 32 Report fails to evaluate objectives, policies and rules as required under the RMA.</li> <li>• Prohibitions inappropriately remove ability for a resource consent to be made, and effects of activity assessed.</li> <li>• Prohibited status not supported by Objectives and Polices, not adequately assessed in Section 32 report.</li> </ul>
Colin Scurr	268	Oppose	That where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should be withdrawn.	<ul style="list-style-type: none"> <li>• Water quality objectives are placed above all, fail to address the variety of values outlined in NPSFW. Little scope for considering other matters, e.g. economic and social wellbeing.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Inconsistent with RMA, NPSFW, and RPS.</li> <li>• Does not provide for reasonable mixing or incorporate qualifiers in relation to discharges.</li> <li>• Section 32 fails to adequately evaluate whether objectives, policies and rules are most appropriate, efficient and effective way to achieve purpose of the Act.</li> <li>• Section 32 fails to adequately assess prohibited activity status.</li> </ul>
Horticulture New Zealand	269	Oppose	Withdraw all elements of the Plan Change and conduct a process similar or the same as the process outlined in Appendix 1. Otherwise, provide for the relief outlined in this submission.	<ul style="list-style-type: none"> <li>• Doesn't support plan change 6A, withdraw and undertake fully consultative process and a full cost benefit analysis.</li> <li>• NPSFW states water quality limits must reflect local and national values. Process for setting limits should be informed by best available information and scientific and socio-economic knowledge.</li> <li>• Chapter 5 of water plan with natural and human use values not reviewed, inappropriate.</li> <li>• Values must be determined before establishment of freshwater objectives and limits and approach to managing the limits.</li> <li>• Development of Plan Change should be undertaken in accordance with NPSFW process.</li> <li>• Section 32 report limited, does not adequately address implementation costs, no clear assessment of efficiency and effectiveness.</li> <li>• Considers the cost of meeting plan change may render some land unable to be used for horticultural production, an unreasonable cost.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 269 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</i></li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Plan change is arbitrary and unworkable, will have substantial adverse impact on horticultural production. Horticulture already has self governing best practice for soil, water and nutrient management.</i></li> <li>• <i>Plan change is inconsistent with the NPSFW.</i></li> </ul>
T M and C M Scurr	275	Amend	That the changes outline in submission be implemented, or otherwise that the present draft of PC6A be rejected or withdrawn.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Wenita Forest Products	279	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> <li>• Doesn't practically allow for primary production operations, such as forestry.</li> <li>• Not meeting permitted rules becomes prohibited even if all practicable measures have been taken to mitigate remedy or avoid effects.</li> <li>• This plan change will require the forestry industry to comply with unrealistic and unachievable standards.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 279 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submission in relation to Objectives and policies.</i></li> <li>• <i>Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules.</i></li> <li>• <i>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</i></li> <li>• <i>Matters relating to reasonable mixing need to be reconsidered.</i></li> <li>• <i>Rules relating to bed disturbance for crossing installation require amendment.</i></li> <li>• <i>Schedule 15 requires amendment.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 279 ref. 202</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</i></li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Amend	Substantial modification.	<ul style="list-style-type: none"> <li>• The plan change will require the forestry industry to comply with unrealistic and unachievable standards.</li> <li>• Particular concern: the thresholds for permitted activities and the default prohibited activity status.</li> <li>• Needs substantial modification.</li> </ul>

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<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282 ref. 202</i>		<ul style="list-style-type: none"> <li>• Plan change should recognise the specific nature of plantation forestry.</li> <li>• Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> <li>• Rules relating to bed disturbance for crossing installation require amendment.</li> <li>• Schedule 15 requires amendment.</li> </ul>
City Forests Limited	283	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> <li>• Doesn't practically allow for primary production operations, such as forestry.</li> <li>• Not meeting permitted rules becomes prohibited even if all practicable measures have been taken to mitigate remedy or avoid effects.</li> <li>• This plan change will require the forestry industry to comply with unrealistic and unachievable standards.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 202</i>		<ul style="list-style-type: none"> <li>• Agree with submission in relation to Objectives and policies.</li> <li>• Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> <li>• Rules relating to bed disturbance for crossing installation require amendment.</li> <li>• Schedule 15 requires amendment.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 283 ref. 202</i>		<ul style="list-style-type: none"> <li>• Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</li> </ul>
Cardrona Land Care Group	286	Oppose	<p>That the present draft of PC6A be rejected or withdrawn.</p> <p>That the Cardrona Valley catchment be considered on its own basis.</p>	<ul style="list-style-type: none"> <li>• Plan change inconsistent with RMA; contrary to sound resource management practice; places water quality objectives above all else such as economic and social wellbeing.</li> <li>• Rules are challenging for compliance. Being uncertain, farmers cannot know day-to-day if they are compliant.</li> <li>• Uncertain rules are unlawful.</li> <li>• Objectives do not address the variety of values that water has.</li> <li>• Plan change inconsistent with RMA, NPS and RPS.</li> <li>• Inappropriately broadens the applicability of rules.</li> <li>• Prohibited activity removes ability for a resource consent on merits and effects of the activity.</li> <li>• Inconsistent with RMA S107as doesn't provide for emergencies, exceptional circumstances, discharges that are temporary or associated with maintenance.</li> <li>• Assumption that all catchments can be managed the same is flawed and incorrect.</li> <li>• Cardrona Valley's unique characteristics have not been taken into account including climate, terrain, natural sediment load, extensive hill country which is impractical to fence.</li> <li>• S32 Report does not evaluate each provision for appropriateness, efficiency or effectiveness to achieve the purpose of RMA.</li> <li>• Due to lack of time, have not included detailed comments within this submission, will table at hearing.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 286 ref. 202</i>		<ul style="list-style-type: none"> <li>• Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</li> </ul>
Southern Wood Council	289	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> <li>• Doesn't practically allow for primary production operations, such as forestry.</li> <li>• Not meeting permitted rules become prohibited even if all practicable measures have been taken to mitigate remedy or avoid effects.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>This plan change will require the forestry industry to comply with unrealistic and unachievable standards.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 289 ref. 202</i>		<ul style="list-style-type: none"> <li>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</li> </ul>
Neil Smith	295	Oppose	Acknowledge that change is evolutionary but in this case respectfully oppose any changes proposed by ORC.	<ul style="list-style-type: none"> <li>Irrigation in district has increased production, helped local businesses, increased school rolls.</li> <li>Nitrogen leaching appears to have stabilised.</li> <li>Waitaki has never been closed for fishing, except in flood.</li> <li>Have both spray and border dyke irrigation, border dyke is more cost efficient.</li> </ul>
Janefield Farm	296	Oppose	<p>Revisit the proposed water plan changes to ensure that while we continue to achieve continued improvement in the state of our water that the plan change will not result in significant economic impacts on all who live in Otago</p> <p>Review its rules and the very short time frame to be able to adjust to these changes.</p>	<ul style="list-style-type: none"> <li>Changes in plan will impose on ability to farm and make a living is great concern.</li> <li>More time spent working with farmer and ORC as a team is the real answer to long sustainable water quality change.</li> </ul>
<i>Albert McTainsh</i>	1004	<i>Support submission 296 ref. 202</i>		<ul style="list-style-type: none"> <li>Provides science-based, workable and practical suggestions.</li> </ul>
Clydevale Dairy Farms Ltd	297	Oppose	<p>That the Plan Change in its entirety is withdrawn and the status quo remains OR</p> <p>The relief sought on specific provisions is provided.</p>	<ul style="list-style-type: none"> <li>ORC not even-handed; dairy farmers singled out while similar infractions from other farming types ignored.</li> <li>Local authorities repeatedly exceed waste water discharge consents.</li> <li>Dairy farmers relatively compliant with existing water quality controls.</li> <li>Plan change places water quality objectives above economic and social wellbeing. This is inconsistent with RMA, NPSFW and RPS.</li> <li>Rules present compliance challenge; many uncertain and inconsistent.</li> <li>Difficult for farmers to know if compliant.</li> <li>No allowance made for reasonable mixing.</li> <li>Qualifiers currently in plan are removed.</li> <li>No apparent ability to assess discharges based on effects.</li> <li>Many of rules are unlawful.</li> <li>S 32 of RMA not complied with, report fails to evaluate appropriateness of objectives or efficiency/effectiveness of policies and rules.</li> </ul>
Greenfield Farming Ltd	298	Oppose	<p>That the Plan Change in its entirety is withdrawn and the status quo remains OR</p> <p>The relief sought on specific provisions is provided.</p>	<ul style="list-style-type: none"> <li>ORC not even-handed; dairy farmers singled out while similar infractions from other farming types ignored.</li> <li>Local authorities repeatedly exceed waste water discharge consents.</li> <li>Dairy farmers relatively compliant with existing water quality controls.</li> <li>Plan change places water quality objectives above economic and social wellbeing. This is inconsistent with RMA, NPSFW and RPS.</li> <li>Rules present compliance challenge; many uncertain and inconsistent.</li> <li>Difficult for farmers to know if compliant.</li> <li>No allowance made for reasonable mixing.</li> <li>Qualifiers currently in plan are removed.</li> <li>No apparent ability to assess discharges based on effects.</li> <li>Many of rules are unlawful.</li> <li>S 32 not complied with, report fails to evaluate appropriateness of objectives or efficiency/effectiveness of policies and rules.</li> </ul>
Big River Dairy Limited	299	Oppose	<p>That the Plan Change in its entirety is withdrawn and the status quo remains OR</p> <p>The relief sought on specific provisions is provided.</p>	<ul style="list-style-type: none"> <li>ORC not even-handed; dairy farmers singled out while similar infractions from other farming types ignored.</li> <li>Local authorities repeatedly exceed waste water discharge consents.</li> <li>Dairy farmers relatively compliant with existing water quality controls.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Plan change places water quality objectives above economic and social wellbeing. This is inconsistent with RMA, NPSFW and RPS.</li> <li>Rules present compliance challenge; many uncertain and inconsistent.</li> <li>Difficult for farmers to know if compliant.</li> <li>No allowance made for reasonable mixing.</li> <li>Qualifiers currently in plan are removed.</li> <li>No apparent ability to assess discharges based on effects.</li> <li>Many of rules are unlawful.</li> <li>S 32 not complied with, report fails to evaluate appropriateness of objectives or efficiency/effectiveness of policies and rules.</li> </ul>
Glen Dene Limited	310	Oppose	<p>Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.</p> <p>Council should continue to work with the Deer farming industry to address any remaining issues and develop workable solutions.</p>	<ul style="list-style-type: none"> <li>Uncertainty of rules and compliance with rules.</li> <li>Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS.</li> <li>Proposal will increase costs and reduce viability of deer industry.</li> <li>S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.</li> </ul>
<i>Central Otago Environmental Society</i>	1028	<i>Oppose submission 310 ref. 202</i>		<ul style="list-style-type: none"> <li>While amendments may be necessary, doing nothing is not an option.</li> </ul>
Ben Graham	311	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> <li>Uncertainty of rules and compliance with rules.</li> <li>Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS.</li> <li>S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.</li> </ul>
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
D J & J C Andrew & the D J Andrew Family Trust & Partnership	315			
Homestead Farm Limited	316			
Rob van Vugt & Sunset Dairy Limited	317			
G B & R E Gardner Partnership	318			
Macraes Community Incorporated	319			
Mainland Poultry Limited	320			
Travis Michelle	321			
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Central Otago Environmental Society</i>	1028	<i>Oppose submissions 311 - 326 ref. 202</i>		<ul style="list-style-type: none"> <li>While amendments may be necessary, doing nothing is not an option.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 323 ref. 202</i>		<ul style="list-style-type: none"> <li>Plan Change should be withdrawn for the reasons set out in Trustpower's submission.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 202</i>		<ul style="list-style-type: none"> <li>Although it doesn't request total plan change withdrawal it recognises the rule package is uncertain and makes it difficult or impossible for farmers to know on a day-to-day basis whether they comply. The high level of uncertainty imposes significant costs and isn't in accordance with the RMA Part 2.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ronald Sheat	330	Oppose	Totally opposed to the water quality plan.	• No reason given.
<i>Ronald Sheat</i>	<i>1018</i>	<i>Support submission 330 ref. 202</i>		• <i>10kg/ha is totally unachievable.</i> • <i>Water quality in the Shag is classed as good.</i>

### 203 Removal of issues - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
University of Otago, Department of Zoology	57	Amend	<p>Amend second paragraph of Introduction [to plan change document]. Explain briefly why non-point source pollution and cumulative effects are so important. The University suggests adding sentences to this paragraph along the following lines "Non-point source pollution is especially hard to quantify. The cumulative effects of pollution may cause damage and degradation to recreational activities, private and public water supplies, the amenity values and natural character of an area, and the flora and fauna of our freshwater ecosystems. It is therefore imperative that we start managing pollution more effectively, including pollution from non-point sources, in order to stop further degradation of our waterways".</p> <p>The Plan could also refer to the recent Council report that showed that water quality has declined in 33 of Otago's 62 regularly monitored waterways during the past 10 years, as cited in an Otago Daily Times article on 18 April 2012.</p>	• Reasons within decision requested.
Pioneer Generation	147	Oppose	<p>That Section 7 (Water Quality) include an Issues section, which set out the key resource management issues to be addressed by the objectives and policies. The issues section must give effect to, and thus be consistent with the policy outcomes provided for within the NPS FM and the RPS. The Issues to be addressed should include:</p> <ol style="list-style-type: none"> <li>1. The effects of non-point source discharges on water quality;</li> <li>2. The need to control the effects of land use intensification on water quality;</li> <li>3. The cumulative effects of proposals to discharge, both on their own and/or in combination with other discharges;</li> <li>4. Contaminants not always being discharged to the most appropriate receiving environment.</li> </ol> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment set out above.</p>	<ul style="list-style-type: none"> <li>• Section 7 not supported by discussion on key issues guiding policy framework.</li> <li>• Issues set the tone on why matters need addressing.</li> </ul>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support submission 147 ref. 203</i>		<ul style="list-style-type: none"> <li>• <i>Supports the request that issues should be included, and supports the issues suggested by submitter.</i></li> <li>• <i>Helpful to understanding the context in which the objectives and policies need to be interpreted.</i></li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support submission 147</i>		• <i>Need to identify key issues.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Dunedin City Council	211	<i>ref. 203</i> Amend	That Chapter 7 is amended by including the issues that have given rise to the new objectives and policies.	<ul style="list-style-type: none"> <li>Assists plan users to understand why new objectives and policies have been adopted.</li> <li>Clearly outlines current water quality issues.</li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 211 ref. 203</i>		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Clutha District Council</i>	<i>1050</i>	<i>Support submission 211 ref. 203</i>		<ul style="list-style-type: none"> <li>Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.</li> <li>Agree with submissions in relation to discharge rules and prohibited discharges.</li> <li>Agree with submissions in relation to bed disturbance.</li> <li>Schedule 15 requires review.</li> <li>Schedule 16 requires review.</li> <li>Section 32 analysis was inadequate.</li> <li>Prohibitions are overly restrictive and have unintended application due to schedule 16 limits.</li> </ul>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 211 ref. 203</i>		<ul style="list-style-type: none"> <li>Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> <li>Activities should only be classified as 'prohibited' where they are likely to result in significant adverse effects.</li> </ul>
Ravensdown Fertiliser Co-operative Ltd	248	Oppose	Seek the inclusion of a commentary on the resource management issues affecting water quality in the region (including those identified above), and an explanation of how the issues are to be addressed by the objectives and policies.	<ul style="list-style-type: none"> <li>Inclusion of issues and explanations would assist the reader.</li> <li>Issues should include: effects of non-point source discharges; management of effects of land use intensification; cumulative effects of discharges; discharge of contaminants to inappropriate receiving environments.</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc	252			
Ballance Agri-Nutrients Ltd	262			
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submissions 248, 252 &amp; 262 ref. 203</i>		<ul style="list-style-type: none"> <li>Rules need to be clear and unambiguous.</li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Forest and Bird	271	Oppose	Re-instate the issues section.	<ul style="list-style-type: none"> <li>Environment Court judgements point out the importance of issues.</li> <li>No reasons given.</li> </ul>
Craiglea Limited	1012	Oppose submission 271 ref. 203		
Mr RJ Borst	1034	Oppose submission 271 ref. 203		<ul style="list-style-type: none"> <li>Not all waterways need to be enhanced.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Glenshee Station Limited	1062	Oppose submission 271 ref. 203		<ul style="list-style-type: none"> <li>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 271 ref. 203		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>

### 208 Chapter 7 - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	<p>Replace all references to 'water body' in the Plan Change 6A with 'freshwater body'.</p> <p>Provide explicit reference in the plan change to tangata whenua cultural values and interests, including kaitiakitanga.</p>	<ul style="list-style-type: none"> <li>RMA definition of 'water body' excludes artificial water bodies, land drainage networks.</li> <li>'Freshwater' broader term.</li> <li>NPSFW gives directions to ORC with regard to Nga Runanga involvement in decision making.</li> <li>Plan change makes no explicit reference to tangata whenua values and interests.</li> </ul>
Contact Energy Limited	1013	Support in part submission 197		<ul style="list-style-type: none"> <li>Supports the request to refer more specifically to "freshwater body" throughout the plan change.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 208		<ul style="list-style-type: none"> <li>• Present reference to water bodies includes geothermal waterbodies, which is inappropriate.</li> <li>• Does not agree with the submission that "freshwater" is a broader term.</li> <li>• Replacement of water body with fresh water body is not supported.</li> </ul>
Horticulture New Zealand	1032	Oppose in part submission 197 ref. 208		<ul style="list-style-type: none"> <li>• Opposes replacement of "water body" with "freshwater body": the proposed plan change should protect public water bodies.</li> <li>• Opposes explicit reference to tangata whenua cultural values and interests: too general to appreciate the effects of the change.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 197 ref. 208		<ul style="list-style-type: none"> <li>• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 197 ref. 208		<ul style="list-style-type: none"> <li>• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose in part submission 197 ref. 208		<ul style="list-style-type: none"> <li>• Explanations provide context and guidance and are useful for certainty and interpretation.</li> </ul>
NZ Transport Agency	203	Amend	Include explanations for objectives and policies.	<ul style="list-style-type: none"> <li>• Explanatory text would help resource users understand the intent of the proposed plan change's objectives and policies.</li> </ul>
Meridian Energy Limited	1014	Support submission 203 ref. 208		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
Dunedin City Council	1025	Support submission 203 ref. 208		<ul style="list-style-type: none"> <li>• Concerned that a balance as not be achieved for social, economic, cultural wellbeing.</li> <li>• Does not recognise discharges can have significant positive benefits outweighing adverse effects.</li> </ul>
Trustpower Limited	206	Did not specify	<p>That such amendments are made to the objectives and policies as required to achieve consistency with the purpose of the RMA as defined in Section 5(2).</p> <p>That such amendments are made to the objectives and policies as required to achieve consistency with the purpose of the RMA. This may require amendments to the existing objectives and policies or additional objectives and policies being proposed.</p>	<ul style="list-style-type: none"> <li>• Alliance seeks that new objectives and policies are included to recognise the positive benefits associated with discharges.</li> </ul>
Alliance Group Limited	1060	Support submission 206 ref. 208		<ul style="list-style-type: none"> <li>• Provides useful context and guidance to plan users.</li> <li>• Many policies vague and have interpretation difficulties.</li> </ul>
Dunedin City Council	211	Amend	That explanations for objectives and policies are included in Chapter 7.	<ul style="list-style-type: none"> <li>• The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</li> <li>• Agrees that explanations for objectives and policies would be useful.</li> </ul>
Contact Energy Limited	1013	Oppose submission 211 ref. 208		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Strath Taieri Community Board	1029	Support submission 211 ref. 208		<ul style="list-style-type: none"> <li>• Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.</li> <li>• Section 32 analysis was inadequate.</li> </ul>
Clutha District Council	1050	Support submission 211 ref. 208		<ul style="list-style-type: none"> <li>• Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>• Greater flexibility should be introduced (particularly in relation to the timeframes).</li> </ul>
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 211 ref. 208		

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> <li>• Activities should only be classified as 'prohibited' where they are likely to result in significant adverse effects.</li> </ul>
Fulton Hogan Limited	222	Amend	Specific policies are needed to provide the appropriate guidance for the rules.	<ul style="list-style-type: none"> <li>• Plan change relies on rules that have uncertainties in their interpretation.</li> </ul>
Holcim (New Zealand) Limited	224			
Otago Commercial Fishing Sector	246	Amend	Include Policies and Objectives relating to the effects of land use on water quality where freshwater interacts with the marine environment.	<ul style="list-style-type: none"> <li>• To create a link between the aims of the Water Plan and Coast Plan.</li> </ul>
Contact Energy Limited	1013	Oppose submission 246 ref. 208		<ul style="list-style-type: none"> <li>• The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</li> <li>• Desirable that the water quality provisions in the Regional Plan address the interface between freshwater bodies and the coastal marine area.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 246 ref. 208		<ul style="list-style-type: none"> <li>• Plan should adopt an effects-based approach to managing rural discharges.</li> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
John Lee & Dennis Pezaro	254	Amend	Some important concepts remain ambiguous. Examples include; "Good quality water", "Natural and Human use values" and "Contaminants".	<ul style="list-style-type: none"> <li>• Concepts are ambiguous with no glossary definition.</li> <li>• Ambiguous if "contaminants" includes chemicals not mentioned in rule 12.C.0.1.</li> </ul>
Contact Energy Limited	1013	Oppose submission 254 ref. 208		<ul style="list-style-type: none"> <li>• The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</li> <li>• Supports the desirability of clarity in the Plan provisions.</li> </ul>
Rayonier New Zealand Ltd	256	Amend	Amendment to policies as may be required to support relief requested below for rules in Chapter 12.	<ul style="list-style-type: none"> <li>• Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.</li> </ul>
Waitaki Irrigators Collective Limited	257	Amend	<p>Include policies and objectives which encourage community-level approaches to managing the effects of activities on water quality.</p> <p>The policies and rules as developed do not make any allowances for the assimilative capacity or mixing zones as a method for enabling good water quality outcomes are met. If the approach which the Council is proposing truly is "effects-based" then allowing for attenuation or mixing zones in order to reduce the negative effects of land-use on water quality would surely meet this objective.</p>	<ul style="list-style-type: none"> <li>• Unclear how community recognition and management of the effect of activities on water quality will be achieved.</li> <li>• Rules are focused on individual level not community.</li> <li>• Few incentives and some disincentives for catchment level mitigation.</li> <li>• Contrary to the RMA, S 70.</li> <li>• Questionable whether there needs to be an improvement in water quality where it is already good.</li> </ul>
Federated Farmers of New Zealand	1057	Support in part submission 257 ref. 208		<ul style="list-style-type: none"> <li>• Ensuring community buy-in will ensure the objectives can be met.</li> </ul>
Horticulture New Zealand	269	Amend	Insert reasonable mixing zones and a policy on reasonable mixing that provides for reasonable mixing into provisions in Plan Change 6A.	<ul style="list-style-type: none"> <li>• Removal of mixing zones removes ability to implement the RMA approach by adverse effects being avoided, remedied, or mitigated.</li> <li>• Inconsistency between regimes for point source and non-point discharges.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 269 ref. 208		<ul style="list-style-type: none"> <li>• Removal of mixing zones removes ability to implement RMA approach (avoid, remedy, mitigate).</li> </ul>
Etrick Fruitgrowers Association Inc	1067	Support submission 269 ref. 208		<ul style="list-style-type: none"> <li>• Plan change is arbitrary and unworkable, will have substantial adverse impact on horticultural production. Horticulture already has self governing best practice for soil, water and nutrient management.</li> <li>• Plan change is inconsistent with the NPSFW.</li> </ul>
Silver Fern Farms Limited	1070	Support submission 269 ref. 208		<ul style="list-style-type: none"> <li>• Silver Fern Farms supports seeking the provision of mixing zones as it made a similar submission.</li> </ul>
Marc Schallenberg	270	Amend	Support the special mention of significant wetlands throughout the	<ul style="list-style-type: none"> <li>• Need to safeguard the water quality and ecological values of all fresh- and</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			water plan; however, would like the ORC to include similar protections for the water quality and ecological values of Otago's significant lakes, rivers, estuaries and aquifers.	brackish water bodies.
Contact Energy Limited	1013	Oppose submission 270 ref. 208		<ul style="list-style-type: none"> <li>The reasons prompting special recognition of significant wetlands in the Otago region do not apply to all other freshwater bodies throughout the region.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 270 ref. 208		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Forest and Bird	271	Amend	<p>Add definitions for 'good', 'very good' and 'excellent' water quality based on SOE Surface Water Quality 2007 report.</p> <p>Add definition of adaptive management to the Glossary:  "Adaptive management is a systematic process for continually improving management policies and practices by learning from the outcomes of previously employed policies and practices. It requires careful implementation, monitoring, evaluation of results, and consequent adjustment of objectives and practices."</p> <p>Define short term as "less than xx working days".</p>	<ul style="list-style-type: none"> <li>Definitions will help plan users to understand Plan provisions.</li> </ul>
Craiglea Limited	1012	Oppose submission 271 ref. 208		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
Contact Energy Limited	1013	Oppose submission 271 ref. 208		<ul style="list-style-type: none"> <li>The suggested definition of "adaptive management" does not capture the need to respond to unsatisfactory and/or unexpected outcomes.</li> <li>The request for other terms to be defined, although supported in principle, is expressed too generally to determine the effect if the submission were accepted.</li> </ul>
Horticulture New Zealand	1032	Oppose in part submission 271 ref. 208		<ul style="list-style-type: none"> <li>Definition of short term does not specify the number of days.</li> <li>Unclear if the definition of adaptive management requires adjustment of objectives and policies.</li> </ul>
Mr RJ Borst	1034	Oppose submission 271 ref. 208		<ul style="list-style-type: none"> <li>Not all waterways need to be enhanced.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 271 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Appropriate water quality should be determined on the basis of the actual water body values the community wishes to see expressed. These should not be dumbed down.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Wenita Forest Products	279	Amend	Amendment to policies as may be required to support relief requested below for rules in Chapter 12.	<ul style="list-style-type: none"> <li>• <i>Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.</i></li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 279 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submission in relation to Objectives and policies.</i></li> <li>• <i>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</i></li> <li>• <i>Matters relating to reasonable mixing need to be reconsidered.</i></li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Amend	Opposes objectives and policies as they support stringent permitted and prohibited activity standards in Chapter 12.	<ul style="list-style-type: none"> <li>• <i>Supports intent of the objectives.</i></li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Plan change should recognise the specific nature of plantation forestry.</i></li> <li>• <i>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</i></li> <li>• <i>Matters relating to reasonable mixing need to be reconsidered.</i></li> </ul>
City Forests Limited	283	Amend	Amendment to policies as may be required to support relief requested for rules in Chapter 12.	<ul style="list-style-type: none"> <li>• <i>Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.</i></li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Agree with submission in relation to Objectives and policies.</i></li> <li>• <i>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</i></li> <li>• <i>Matters relating to reasonable mixing need to be reconsidered.</i></li> </ul>
Fish and Game (Otago)	287	Amend	Would like the addition of this policy section, or such policy that has similar effect: "Policies for public information 7.E.1 Provide the public with full information on water quality, including but not limited to the following: (a) Results of water quality monitoring of catchments and subcatchments at regular intervals, including the level of compliance with the permitted activity rules (b) Information on agricultural nutrients that is supplied to the Otago Regional Council as part of compliance with the permitted activity status is to be treated as public information."	<ul style="list-style-type: none"> <li>• <i>Public interest in water management needs reaffirming.</i></li> <li>• <i>Public must be provided with information about long term rights of discharge to waterways which are permitted.</i></li> <li>• <i>With no AER, the plan needs a policy to link it to water quality monitoring and SOE reporting.</i></li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 287 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Information on water quality monitoring and on agricultural nutrients as part of compliance can be commercially sensitive to a farmers business.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 208</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035	<i>submission 287</i>		



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr BJ Graham	1036	ref. 208		
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
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Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 287 ref. 208		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Southern Wood Council	289	Amend	Amendment to policies as may be required to support relief requested for rules in Chapter 12.	<ul style="list-style-type: none"> <li>Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.</li> </ul>
Andrea Clarke	305	Amend	Policies need to reflect the current water quality within catchments and work towards improving the quality of waterways that have been identified as fair or poor under the Council's yearly monitoring scheme.	<ul style="list-style-type: none"> <li>Concerned by difficulty in identifying individual source of pollutants.</li> <li>Have potential to encourage landowners to consider existing land management practice and ways to deal with pollutants.</li> </ul>

### 209 Chapter 12 - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Roy A Wilson	49	Did not specify	How this discharge [south end of Taieri Plain] can be guaranteed to be the required quality must be proven before anymore ratepayers funds are spent.	<ul style="list-style-type: none"> <li>South end of Taieri Plain is unique design where water is pumped out.</li> <li>Discharge joined by other drainage from several areas, e.g. Berwick triangle, under the contour channel.</li> </ul>
S H Andrews and Sons Ltd	61	Did not specify	Will in no way accept responsibility for degraded water measured as it leaves our property unless it can be conclusively proven that it was attributed to our farming practices and not originating upstream.	<ul style="list-style-type: none"> <li>Potentially threaten ability to farm.</li> <li>Water draining our farm is reasonable quality.</li> <li>Will not accept responsibility for degraded water entering property from neighbours.</li> <li>Flooding events result in water eventually entering Taieri often weeks or months later.</li> </ul>
Green Party (Dunedin Branch)	62	Amend	If the ORC thinks that stricter rules may be needed in the future it should at least indicate in a document such as this Water Quality Rules and Standards, that if, in the future, standards are not being met under the existing rules future rules will be introduced. The nature of these future rules would need to be spelt out.	<ul style="list-style-type: none"> <li>NZ authorities need to be aware of consequences that will follow from the government signing the Trans Pacific Partnership Agreement and some Free Trade Agreements.</li> <li>Clauses give a partner nation's company the right to take legal action, where laws, rules and policies are changed subsequent to the company operating in NZ. The least restrictive conditions apply, as stricter rules are treated as</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 209</i>		unreasonable constraints on free trade. • <i>Inappropriate to include future rules in RPW.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 62 ref. 209</i>		• <i>Inappropriate for a regional plan to include future rules.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 209</i>		<ul style="list-style-type: none"> <li>• <i>Does not allow flexibility for existing farming operations to give effect to the NPS.</i></li> <li>• <i>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</i></li> <li>• <i>Does take into account local environmental conditions and economic/development consideration.</i></li> <li>• <i>Disproportionate and overly restrictive.</i></li> </ul>
<i>Invernia Holdings Ltd</i>	83	<i>Amend</i>	<i>Option 2 ["control discharges through resource consents" in section 5.5 of the Section 32 Report is supported].</i>	• <i>The Waitaki catchment is unique and should be separate from the rest of Otago.</i>
<i>Dairy NZ Limited</i>	146	<i>Amend</i>	<i>Include a rule for proposed or existing activities that would otherwise default under section 87B of the RMA to be discretionary activities, with some specific guidance on what applicants need to do to obtain a resource consent.</i>	• <i>No guidance for resource consent applications.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 146 ref. 209</i>		• <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 146 ref. 209</i>		• <i>Consistent with Ernslaw One's submission.</i>
<i>City Forests</i>	1071	<i>Support submission 146 ref. 209</i>		• <i>Consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being</i>	1074	<i>Support in part</i>		• <i>Activities should only be prohibited where they are likely to result in significant</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>partners of the Dairy Farms Partnership</i>		<i>submission 146 ref. 209</i>		<i>adverse effects.</i> • <i>Provision should be made in transitional provisions for resource consents for existing discharges, even where those do not meet the proposed discharge limits.</i>
Dan Smale	180	Amend	Would like the plan changed so that non-point source discharge rules and regulations apply not only to horticulture practices (i.e. dairying) but also explicitly stated that they also apply to mining and industrial processes.	• No reason given.
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Oppose submission 180 ref. 209</i>		• <i>Oppose this submission as it seeks to extend the discharge rules to industrial and mining (in addition to horticulture) which is not the purpose of this Plan Change.</i>
Alliance Group Limited	187	Amend	Retain Principal Reasons for the rules in Section 12, and develop new Principal Reasons to justify the proposed rules.	• To provide certainty. • In accordance with RMA Section 67(2)(c).
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support submission 187 ref. 209</i>		• <i>Reasons stated in the submission.</i>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 187 ref. 209</i>		• <i>Rules need to be certain.</i>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries Limited</i>	<i>1049</i>			
<i>Clutha District Council</i>	<i>1050</i>			
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	Replace all references to 'water body' in the Plan Change 6A with 'freshwater body'.  Provide explicit reference in the plan change to tangata whenua cultural values and interests, including kaitiakitanga.	• RMA definition of 'water body' excludes artificial water bodies, land drainage networks. • 'Freshwater' broader term. • NPSFW gives directions to ORC with regard to Nga Runanga involvement in decision making. • Plan change makes no explicit reference to tangata whenua values and interests.
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Oppose submission 197 ref. 209</i>		• <i>Replacement of water body with fresh water body is not realistic</i>
<i>Otago Water Resource Users</i>	<i>1056</i>	<i>Oppose</i>		• <i>Opposes replacement of "water body" with "freshwater body": the proposed</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Group		submission 197 ref. 209		plan change should protect public water bodies. • Opposes explicit reference to tangata whenua cultural values and interests: too general to appreciate the effects of the change.
Glenshee Station Limited	1062	Oppose submission 197 ref. 209		• Opposes submission insofar as it supports retention of plan change and fails to recognise its effect on farmers to provide for their social and economic wellbeing.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose in part submission 197 ref. 209		• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Dunedin City Council	211	Amend	That each of the rules in these sections [12.A-12.C] be revised to clarify the status of activities, rather than relying on the introductory notes.	• Introductory notes do not have legal weight. • Rules do not reflect interpretation contained in introductory notes and will result in ambiguity and confusion.
Contact Energy Limited	1013	Support submission 211 ref. 209		• Reasons stated in the submission.
Meridian Energy Limited	1014	Support submission 211 ref. 209		• Where status of activities is uncertain and open to various interpretations, it should be made clearer.
Rayonier New Zealand Limited	1015	Support submission 211 ref. 209		• Consistent with Rayonier's submission.
Ermslaw One Ltd	1016	Support submission 211 ref. 209		• Consistent with Ermslaw One's submission.
Strath Taieri Community Board	1029	Support submission 211 ref. 209		• No reason given.
Horticulture New Zealand	1032	Support submission 211 ref. 209		• For the reasons given by the submitter.
City Forests	1071	Support submission 211 ref. 209		• Consistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 211 ref. 209		• Clarification required to references of 'good quality water' and 'natural and human use values'. • Greater flexibility should be introduced (particularly in relation to the timeframes). • Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges. • Activities should only be classified as 'prohibited' where they are likely to result in significant adverse effects.
Meridian Energy Limited	251	Amend	Clarify the rules structure, in particular in relation to proposed Restricted Discretionary Rule 12.C.2.1- ensure that this is the only trigger in regard to construction related discharges.  Amend proposed permitted activity rules so they are measurable and enforceable.	• Uncertainty needs to be resolved if Plan is to be practical to implement. • Allow for construction activities without need to be assessed first under prohibitions and permissions. • No explanation about how rule sits with surrounding structure, whether rule is stand alone or whether permitteds or prohibitions need to be considered first. • Undertake a robust section 32 analysis, including scientific and economic assessments.
Contact Energy Limited	1013	Support submission 251 ref. 209		• Supports suggested relief on construction-related discharges. • These discharges should be treated separately as they are short-term by nature.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 251 ref. 209</i>		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 251 ref. 209</i>		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 251 ref. 209</i>		<ul style="list-style-type: none"> <li>• Need for clarity in the rules structure.</li> <li>• Need to amend permitted standards so that they are measurable and enforceable.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 251 ref. 209</i>		<ul style="list-style-type: none"> <li>• For the reasons given by the submitter.</li> </ul>
<i>City Forests</i>	1071	<i>Support submission 251 ref. 209</i>		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
Waitaki Irrigators Collective Limited	257	Amend	<p>Insertion of a clause to recognise that there can be movement of water across properties or that some water bodies can be ephemeral in nature and pick up contaminants from multiple properties before "discharging".</p> <p>Insertion of a rule that would allow the capture and re-use of irrigation run-off as a permitted activity.</p> <p>The policies and rules as developed do not make any allowances for the assimilative capacity or mixing zones as a method for enabling good water quality outcomes are met. If the approach which the Council is proposing truly is "effects-based" then allowing for attenuation or mixing zones in order to reduce the negative effects of land-use on water quality would surely meet this objective.</p>	<ul style="list-style-type: none"> <li>• No protection for landholders where water enters their land in a degraded state.</li> <li>• WIC were advised farmers would be protected from this.</li> <li>• Is another option to help improve water quality and water-use efficiency.</li> <li>• Current rules make this costly process.</li> <li>• Contrary to the RMA, S 70.</li> <li>• Questionable whether there needs to be an improvement in water quality where it is already good.</li> </ul>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 257 ref. 209</i>		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 257 ref. 209</i>		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
<i>City Forests</i>	1071	<i>Support submission 257 ref. 209</i>		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
Horticulture New Zealand	269	Amend	This approach is not supported in the plan change.	<ul style="list-style-type: none"> <li>• Only allowing for permitted or prohibited activities is contrary to Part II RMA.</li> <li>• RMA clearly allows for broader regulatory structure.</li> <li>• Appears if activity is not permitted then it is prohibited.</li> </ul>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 269 ref. 209</i>		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 209</i>		<ul style="list-style-type: none"> <li>• Plan change is arbitrary and unworkable, will have substantial adverse impact on horticultural production. Horticulture already has self governing best practice for soil, water and nutrient management.</li> <li>• Plan change is inconsistent with the NPSFW.</li> </ul>
Wenita Forest Products	279	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns	<ul style="list-style-type: none"> <li>• Insufficient consideration given to the impacts on forestry sector.</li> <li>• Fails to provide a default standard in event of non-compliance.</li> </ul>
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Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Te Putahi Ngāherehere o Aotearoa Incorporated, Otago/Southland Section			discussed in this submission.	<ul style="list-style-type: none"> <li>• Need to provide clarity and certainty.</li> </ul>
City Forests Limited	283			
Calder Stewart Industries Limited	1049	Support submissions 279, 282 & 283 ref. 209		<ul style="list-style-type: none"> <li>• Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> </ul>
Paterson Pitts Partners Ltd	288	Amend	That the plan change needs to provide for a specific exemption for existing border dyke and flood irrigation, with at least a 30-year transition period to full compliance.	<ul style="list-style-type: none"> <li>• Difficult for extensive flood and border dyke irrigation, in Central Otago to comply with the limits.</li> <li>• Prohibiting this type of irrigation will have enormous economic impact.</li> </ul>
Federated Farmers of New Zealand	1057	Support in part submission 288 ref. 209		<ul style="list-style-type: none"> <li>• Difficulties for compliance relating to border dyke irrigation.</li> <li>• Ensuring achievability ensures objectives can be met.</li> </ul>
Southern Wood Council	289	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> <li>• Insufficient consideration given to the impacts on forestry sector.</li> <li>• Fails to provide a default standard in event of non-compliance.</li> <li>• Need to provide clarity and certainty.</li> </ul>
Beaton Family	291	Amend	<p>Seeks clarification on the following:</p> <ul style="list-style-type: none"> <li>- Will the pumping of flood waters become a restricted or prohibited activity?</li> <li>- Do we have to be able to pump off flood waters within a specified time?</li> <li>- Will this time be achievable in practice?</li> <li>- Will it become necessary to divert fresh water over land to dilute natural waters within a floodbanked area before pumping i.e. diverting the Contour Channel through the West Taieri Drainage Area before pumping back into Lake Waipori.</li> </ul> <p>Large numbers of ducks and swans go directly from farm land to the lakes. They feed on the pasture lands of the Taieri Plains at night and return to Lakes Waipori and Waihola during the day big flights of them at times of the year. What effect does this have?</p>	<ul style="list-style-type: none"> <li>• Flood may take long time to drain.</li> <li>• Flood water may release an odour, create foams.</li> <li>• May be several days until we can pump flood waters.</li> <li>• Water not back to normal within 12 hours.</li> <li>• Lakes can become muddy with good wind.</li> <li>• Fish and Game should be made to account for effects of game birds.</li> </ul>
William John Pile	301	Amend	<p>Leave as it is [any changes to spray irrigation].</p> <p>[Retaining water on property] Have regard to the soil type and look at individual situations.</p>	<ul style="list-style-type: none"> <li>• Millions have been spent on border dyking with great success.</li> <li>• Leave successful irrigation systems as they are.</li> <li>• Are good caretakers of our farms.</li> <li>• Would object to removing shelter trees.</li> <li>• Impossible to meet limits on Waitaki plains in flood situation.</li> </ul>
Andrea Clarke	305	Amend	Rules need to reflect the current water quality within catchments and work towards improving the quality of waterways that have been identified as fair or poor under the Council's yearly monitoring scheme.	<ul style="list-style-type: none"> <li>• Concerned by difficulty in identifying individual source of pollutants.</li> <li>• Have potential to encourage landowners to consider existing land management practice and ways to deal with pollutants e.g. Great allowance for climatic conditions and investing in better effluent management systems.</li> </ul>
The Director-General of Conservation	306	Amend	That 12.3.1.3 be amended as follows, or to like effect: "(d) Mokoreta River from its source to the Otago Regional Council boundary."	<ul style="list-style-type: none"> <li>• Currently does not give full effect to the Water Conservation (Mataura River) Order 1997.</li> <li>• RMA regional plans must not be inconsistent with water conservation orders.</li> </ul>
Craiglea Limited	1012	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• No evidence from environmental impacts from agricultural activities.</li> <li>• Changes are vague, unclear and open-ended.</li> <li>• No need for further restrictions on discharges.</li> </ul>
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• Would impact on farming operation.</li> <li>• Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Strath Taieri Community Board	1029	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• Costs of the proposed changes outweigh the benefits.</li> <li>• No reason given.</li> </ul>
Mr RJ Borst	1034	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>
Moutere Station Limited	1052			
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• No adequate justification for inclusion.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 209		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Greenfield Rural Opportunities	1077	Oppose		<ul style="list-style-type: none"> <li>• Methodology used to identify areas of significant aquatic values not stated, no</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Limited		submission 306 ref. 209		<p>indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</p> <ul style="list-style-type: none"> <li>• Rules fail relevant tests under section 32 RMA.</li> <li>• Additional controls not justified in terms of effects.</li> <li>• Seek the submission be disallowed.</li> </ul>

### 211 Compliance, enforcement, education

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Andrew McCurdy	6	Amend	Amend plan to include monitoring of compliance by ORC.	<ul style="list-style-type: none"> <li>• Essential for plan implementation, waterway preservation, polluter compliance.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 6 ref. 211		<ul style="list-style-type: none"> <li>• Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>• Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>• Does take into account local environmental conditions and economic/development consideration.</li> </ul>
W H Thomas	10	Not Applicable	Surveillance of farmers and other land managers to achieve discharge limits is essential to control any activities in this direction.	<ul style="list-style-type: none"> <li>• To achieve discharge limits.</li> </ul>
E J Munro	29	Not Applicable	Waterways need protection through prosecution of those who offend.	<ul style="list-style-type: none"> <li>• Voluntary measures do not stop degradation.</li> <li>• Dairying only allowed when safeguards are in place.</li> </ul>
Lynne Hill	35	Not Applicable	Water is a valuable resource and should be carefully monitored.	<ul style="list-style-type: none"> <li>• Intensive farming linked to declining water quality.</li> </ul>
Mosgiel Taieri Community Board	46	Amend	That the Plan must be clearer, able to be monitored efficiently and effectively and the proposed mitigation needs to be cost effective.	<ul style="list-style-type: none"> <li>• Rules pertaining to control of discharges such as overland run-off and to groundwater are uncertain and difficult to apply.</li> <li>• Uncertainty means difficult to be confident of compliance and manage risk.</li> <li>• Our area renowned for flooding.</li> </ul>
TrustPower	1059	Support submission 46 ref. 211		<ul style="list-style-type: none"> <li>• Plan Change requires a monitoring and enforcement programme.</li> <li>• Unclear how the discharges will be monitored - This should be clarified.</li> </ul>
Alliance Group Limited	1060	Support submission 46 ref. 211		<ul style="list-style-type: none"> <li>• Alliance generally supports submissions seeking to clarify how the plan change will be implemented in terms of monitoring, compliance and enforcement.</li> </ul>
Craig Werner	48	Amend	Add to it the proposal to do monitoring of water runoff quality at every property at multiple points.	<ul style="list-style-type: none"> <li>• Planned runoff testing programme details not given.</li> <li>• Many testing points required if runoff monitoring/control is the single regulatory method used, given the range of Otago geomorphology and geology.</li> <li>• Sampling numerous points can be expensive.</li> <li>• Selection of few test points too open to individual sampling bias and error which might leave points of dirty leakage undiscovered.</li> </ul>
University of Otago, Department of Zoology	57	Amend	Amend Introduction [to plan change document] to add detail on enforcement regime for new Water Plan regulations. Better explain how the new discharge regulations in Rules 12.C.0, 12.C.2 and 13.5A.0 are to be monitored and enforced by Council. This could be achieved by cross referencing the Monitoring and Review Section 19 of the Water Plan and inserting a sentence regarding the relevant enforcement sections in the RMA (Part 12, Declarations, Enforcement and Ancillary Powers).	<ul style="list-style-type: none"> <li>• Emphasise new regulations are not in name only and will be monitored and enforced by ORC.</li> <li>• Prosecution action taken for non-compliance.</li> </ul>
TrustPower	1059	Support submission 57		<ul style="list-style-type: none"> <li>• Plan Change requires a monitoring and enforcement programme.</li> <li>• Unclear how the discharges will be monitored - This should be clarified.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 211</i>		
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 57 ref. 211</i>		<ul style="list-style-type: none"> <li>• Ensures contaminants being discharged directly or indirectly are reduced.</li> </ul>
Green Party (Dunedin Branch)	62	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• How does the Plan propose to judge the source of contaminant in a waterway?</li> <li>• Plan does not address how to monitor and control non-point source pollution.</li> <li>• Discharges can only be monitored in water courses leaving a property.</li> <li>• Water leaving property may have originated elsewhere.</li> <li>• Serious omission.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 211</i>		<ul style="list-style-type: none"> <li>• No reason stated.</li> </ul>
<i>Mr RJ Borst</i>	1034			
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Peter T Borrie	69	Not Applicable	Promote monitoring to ensure we all abide by the required standards to ensure that quality is maintained.	<ul style="list-style-type: none"> <li>• No deterioration in water quality.</li> <li>• 4th generation farmer and land caretaker.</li> </ul>
River-Estuary Care: Waikouaiti-Karitane	79	Not Applicable	The lead time to full compliance should be used as an active period with full engagement of council, landowners and communities to make sure this [plan change] works.	<ul style="list-style-type: none"> <li>• If properly implemented, could allow for better stewardship by landowners, councils and the general public.</li> <li>• A lot will depend on good monitoring practices and vigilant effective compliance follow up.</li> </ul>
Southern District Health Board	103	Not Applicable	That the ORC retains control of any auditing and compliance work.	<ul style="list-style-type: none"> <li>• Unsure how ORC are going to achieve increased compliance work coming out of changes.</li> <li>• Audited self management is a tool that is being increasingly used to manage compliance costs and could be used given the volume of compliance work that will be generated.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Oppose in part submission 103 ref. 211</i>		<ul style="list-style-type: none"> <li>• ORC responsible for State of the Environment Monitoring and for auditing resource consent conditions.</li> <li>• Consent holders should be responsible for all other monitoring necessary to confirm consent compliance.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	Support submission 103 ref. 211		<ul style="list-style-type: none"> <li>Protects habitats and wider needs of mahika kai, taoka species and other species of importance to Kai Tahu ki Otago.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 103 ref. 211		<ul style="list-style-type: none"> <li>Does take into account local environmental conditions and economic/development consideration.</li> <li>Disproportionate and overly restrictive.</li> </ul>
Alan McMillan	104	Not Applicable	A specific program of monitoring is established by ORC, or an independent body, and rigorously enforced.	<ul style="list-style-type: none"> <li>Concept of reliance on self-monitoring is flawed.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	Support in part submission 104 ref. 211		<ul style="list-style-type: none"> <li>Further submitter would be satisfied if the "audited" part of audited self-management was implemented.</li> <li>ORC must retain independence of monitoring beyond this.</li> </ul>
Stewart Morrison	116	Amend	<p>Discharge to water should be averaged out as one discharge per farm not individual drains.</p> <p>Need more information on how to measure and where to measure.</p>	<ul style="list-style-type: none"> <li>Average discharges over whole farm (15 drains) for a more accurate measure of impact on water quality.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 116 ref. 211		<ul style="list-style-type: none"> <li>Amend limits and transition times.</li> <li>Must be stronger links between discharge compliance and environmental improvements.</li> <li>Needs to be more science informed decision making.</li> </ul>
Cath Gilmour	128	Not Applicable	Enforcement and monitoring be actively undertaken by the regional council.	<ul style="list-style-type: none"> <li>Concerned about approach of permitting landowners to manage, meet standards or get consent rather than ORC actively applying and enforcing them.</li> <li>By the time compliance undertaken, damage done.</li> </ul>
Clutha Agricultural Development Board	139	Not Applicable	<p>Emphasis should be solely on the quality of water measured in waterways, not in water that may get into waterways.</p> <p>Acknowledge that spot checks will not be used against farmers who may in all respects be following 'best on-farm practice' to minimise damage to water quality.</p> <p>Farmers would like assurance that these rule changes will be fairly applied across all water management situations, urban and rural.</p>	<ul style="list-style-type: none"> <li>Effects should be monitored, rather than particular practices that may affect water quality.</li> <li>Research shows one off sampling doesn't accurately show health status or understanding of the complex chemistry / natural variables involved.</li> <li>Random and unfair 'example setting' will alienate farmers.</li> <li>Concerns about the likely fairness in the administration and enforcement of PPC6A.</li> </ul>
Otago Conservation Board	140	Not Applicable	Withdraw Plan Change 6A; or provide clear and consistent guidance and support for landowners to ensure delivery, including a clearly stated plan for and schedule of compliance audit monitoring by Council.	<ul style="list-style-type: none"> <li>Concern with effects-based strategy, which is reactive. Reactive approach seems to accommodate protracted and incremental deterioration of water quality. Only proactive regulation of polluting land-use activities can prevent deterioration of water quality.</li> <li>Reliance on individual landowners to maintain accurate records and undertake appropriate monitoring.</li> <li>Without clear and consistent guidance compliance and monitoring process will be overly complex for landowners.</li> <li>Could lead to the deterioration of Otago's freshwater habitats, ecosystems and species.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	Oppose submission 140 ref. 211		<ul style="list-style-type: none"> <li>Some headwater streams suffer the potential problem of degradation, however for the majority of the waterways the standards will result in improvement or maintenance of water quality.</li> </ul>
<i>Mr RJ Borst</i>	1034	Support in part submission 140 ref. 211		<ul style="list-style-type: none"> <li>Supports withdrawal of the plan.</li> <li>Agree plan provisions are unclear and complex.</li> <li>No point monitoring if the effects of the activity being monitored are unable to be identified. Non-compliance levels must be clear.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport</i>	1038			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 140 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Schedule 16 does not take into account local environmental conditions and economic/development consideration.</i></li> <li>• <i>Schedule 16 is disproportionate and overly restrictive.</i></li> </ul>
Ruth McNamara	160	Not Applicable	Voluntary testing should not be allowed. Mandatory 3 year testing of properties by ORC staff, and registers kept of all the properties and the results of the tests so that checks are followed up on until they meet the required standards.	<ul style="list-style-type: none"> <li>• More ORC input needed for testing of non-point source water quality, land management.</li> <li>• ORC to oversee what is happening before contaminants get to waterway.</li> <li>• No township in Central Otago should have to boil water.</li> <li>• Time to rectify any problem.</li> </ul>
Peter George	172	Not Applicable	Larger fines and more rural inspections.	<ul style="list-style-type: none"> <li>• Waterways being ruined for profit.</li> <li>• For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated.</li> <li>• Ignorance not an excuse.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 172 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessarily restrictive.</i></li> <li>• <i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
Dan Smale	180	Not Applicable	Monitoring of water quality be expanded to look at water quality indicators related to mining and industrial discharges - where and when needed.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
John Barlow	198	Not Applicable	Add another section to the plan, say section 17, which would detail how non compliance is to be handled.	<ul style="list-style-type: none"> <li>• Plan needs to spell out what happens when an activity which has been allowed but cannot comply, continues to non comply with no possibility of complying.</li> <li>• Plan change silent on these matters.</li> <li>• Proposed approach will only work with sufficient resources allocated to monitoring individual catchments, and dealing with subsequent non-compliance.</li> </ul>
Trustpower Limited	206	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• Monitoring and enforcement of proposed rules could potentially generate significant strain on ORC's resources.</li> <li>• Onus may be on consent holders to achieve targets. Creates unfair burden not shared by all discharges.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 206 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change requires a monitoring and enforcement programme.</i></li> <li>• <i>Unclear how the discharges will be monitored - This should be clarified.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support</i>		<ul style="list-style-type: none"> <li>• <i>Alliance generally supports submissions seeking to clarify how the plan</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 206 ref. 211</i>		<i>change will be implemented in terms of monitoring, compliance and enforcement.</i>
Medical Students For Global Awareness	227	Not Applicable	That ORC along with the proposed changes provide informational support to those required to make changes.	<ul style="list-style-type: none"> <li>Continued education needed.</li> <li>Actively make updated information readily available to all farmers.</li> <li>Cleaning up waterways is a public issue stemming from practices we as a nation use to support our economy,</li> <li>It is unfair to make it all the farmers' responsibility when it is everyone's responsibility.</li> <li>ORC is a leadership body that can get this message to central government and the general public.</li> </ul>
Central Otago Environmental Society Inc	233	Amend	<p>Add a section or schedule indicating how discharges will be monitored and what actions will follow from proven non-compliance.</p> <p>Provide for the active involvement of interested individuals and groups as voluntary water quality monitors of their local streams and rivers.</p> <p>Include a provision for robust and regular reporting on the condition of Otago's streams, rivers and lakes.</p>	<ul style="list-style-type: none"> <li>Effects-based strategy relies on stringent monitoring and compliance programme.</li> <li>Costs of implementing monitoring regime concerning.</li> <li>Potential for volunteers as water quality monitors.</li> <li>Keep public informed to maintain support.</li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 233 ref. 211</i>		<ul style="list-style-type: none"> <li><i>Plan Change requires a monitoring and enforcement programme.</i></li> <li><i>Unclear how the discharges will be monitored - This should be clarified.</i></li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 233 ref. 211</i>		<i>Submission requests stricter controls on agricultural activities without recognising social and economic effects such controls would have on farmers already potentially burdened with considerable compliance costs.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose submission 233 ref. 211</i>		<ul style="list-style-type: none"> <li><i>Plan should adopt an effects-based approach to managing rural discharges.</i></li> <li><i>Overly restrictive and disproportionate.</i></li> <li><i>Does not take into account economic considerations.</i></li> </ul>
Queenstown Lakes District Council	255	Not Applicable	<p>Provide assurance that effective and regular monitoring is undertaken.</p> <p>Provide clear and consistent guidance and support for landowners to ensure delivery.</p>	<ul style="list-style-type: none"> <li>Could result in ORC responding after problem.</li> <li>Doesn't prevent in the first instance.</li> <li>Process overly complex for landholders to operate.</li> <li>Potentially increase liability to prosecution.</li> </ul>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 255 ref. 211</i>		<i>No reasons given.</i>
<i>Clutha District Council</i>	<i>1050</i>	<i>Support in part submission 255 ref. 211</i>		<ul style="list-style-type: none"> <li><i>Further clarity is needed.</i></li> <li><i>Too complex for landowners.</i></li> <li><i>Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects.</i></li> <li><i>Schedule 16 limits should reflect variations in waterbodies.</i></li> <li><i>Schedule 15 standards need to be accurate and targeted.</i></li> </ul>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 255 ref. 211</i>		<ul style="list-style-type: none"> <li><i>Recognition Schedules 15 and 16 don't accurately reflect variations between water bodies.</i></li> <li><i>Agreed that allowance for appropriate mixing zones should be included.</i></li> <li><i>Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</i></li> <li><i>Seeks the submission be allowed and the plan change be amended as per the submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms</i>	<i>1074</i>	<i>Oppose submission 255</i>		<i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Partnership</i>		<i>ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Waitaki Irrigators Collective Limited	257	Not Applicable	Rules should not be open to different interpretations depending on the ORC representative one is dealing with 'on the day'.	<ul style="list-style-type: none"> <li>• Concerned how rules will be enforced on the ground.</li> <li>• Rules lack definition leaving landholders in positions of uncertainty in cases of compliance monitoring.</li> <li>• Different ORC officers have different understandings on how to interpret, implement, and enforce rules and policies.</li> </ul>
North Otago Irrigation Company	260	Not Applicable	<p>Provide further information on ORC's compliance strategy.</p> <p>Recognise in ORC's compliance strategy that if farmers implement good environmental practices then they are taking appropriate steps towards achieving discharge limits and will not be subject to compliance action, at least in the short term.</p> <p>Provide a summary of "good environmental practice" for various farming operations to farmers as a middle ground between an effects-based approach and activity-based requirements.</p> <p>Further develop the definition of watercourse and/or provide some clear examples to help farmers and council compliance officers understand what is and isn't a watercourse.</p>	<ul style="list-style-type: none"> <li>• Current approach has significant uncertainty and risk for farmers if don't know how to avoid prosecution.</li> <li>• Approach has significant uncertainty and risk for farmers if don't know how to avoid prosecution.</li> <li>• Definition of watercourse in RMA and regional plan is confusing (e.g. what is "intermittently flowing"? What is the difference between a farm drain and a modified watercourse.</li> <li>• Clarification will help decision making on whether consent needed.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i></li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Support the NOIC submission in full.</i></li> </ul>
Forest and Bird	271	Not Applicable	The approach of setting limits and only requiring consents if limits are not met, will require constant vigilance by Council to monitor and enforce limits.	<ul style="list-style-type: none"> <li>• Congratulate ORC on innovative approach.</li> <li>• Plan's integrity can only be upheld by strict enforcement.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Background data required before any agricultural activities are restricted.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>No point monitoring if the activity's effects cannot be identified.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries</i>	1049			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Fish and Game (Central South Island)	273	Not Applicable	<p>A new Schedule be created for this plan, indicating the methodology that will be used to assess noncompliance with the plan. In particular, it should indicate the following:</p> <ul style="list-style-type: none"> <li>- Methods used to determine the source and direction of discharge</li> <li>- The approach used in cases where it cannot be distinguished which individual property that a discharge may be coming from. The ability to jointly prosecute noncompliant properties needs to be an option.</li> <li>- A list of priority catchments for compliance work. This is substantially the same list as was in Policy 7.6 which has now been removed, and it is also much the same list as in the recent State of the Environment water quality report.</li> </ul>	<ul style="list-style-type: none"> <li>• Clarity about compliance and monitoring required to enact this plan change and to make it effective.</li> <li>• Plan provides no direction on compliance and monitoring.</li> <li>• Provides no evidence on feasibility of ensuring compliance.</li> <li>• For plan to be effective there needs to be confidence that it's practicable and enforceable.</li> <li>• How will non-compliant catchments be studied to determine where non-compliance will be occurring.</li> <li>• If compliance and is not addressed then plan change risks failing.</li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 273 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Request for methodology to assess non-compliance is unnecessary and inappropriate.</i></li> <li>• <i>PC6A adequate provisions to deal with non-point discharges.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 211</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Otago Water Resource Users Group	1056	Oppose in part submission 273 ref. 211		<ul style="list-style-type: none"> <li>Such measures would need to be agreed on.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 273 ref. 211		<ul style="list-style-type: none"> <li>New schedule not proven appropriate or necessary, covered elsewhere in plan.</li> </ul>
TrustPower	1059	Support submission 273 ref. 211		<ul style="list-style-type: none"> <li>Plan Change requires a monitoring and enforcement programme.</li> <li>Unclear how the discharges will be monitored - This should be clarified.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 273 ref. 211		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Fish and Game (Otago)	287	Not Applicable	<p>That a new Schedule be created for this plan, indicating the methodology that will be used to assess noncompliance with the plan. In particular, it should indicate the following:</p> <p>(a) Methods used to determine the source and direction of discharge</p> <p>(b) The approach used in cases where it cannot be distinguished which individual property that a discharge may be coming from. The ability to jointly prosecute noncompliant properties needs to be an option.</p> <p>(c) A list of priority catchments for compliance work. This is substantially the same list as was in Policy 7.6 which has now been removed, and it is also much the same list as in the recent State of the Environment water quality report.</p> <p>The list of streams [in Section 7.6] needs to be sent to compliance for priority enforcement action.</p>	<ul style="list-style-type: none"> <li>Clarity about compliance and monitoring required to make plan change effective.</li> <li>Plan change provides no clearly written, strong direction on how monitoring and compliance will be undertaken.</li> <li>How plan change will be implemented and monitored, and how compliance staff deal with breaches is a concern.</li> <li>No evidence provided on feasibility or ensuring rules are enforced and enforceable.</li> <li>Seems unlikely that existing budget for compliance and monitoring will be sufficient to meet the new requirements of the plan.</li> <li>Is a reminder of past policy failures to protect waterways.</li> </ul>
New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)	1010	Oppose submission 287 ref. 211		<ul style="list-style-type: none"> <li>Request for methodology to assess non-compliance is unnecessary and inappropriate.</li> <li>PC6A adequate provisions to deal with non-point discharges.</li> </ul>
Craiglea Limited	1012	Oppose submission 287 ref. 211		<ul style="list-style-type: none"> <li>Not all waterways should have a high standard of water quality.</li> <li>Affected by a variety of activities, not just agricultural uses.</li> <li>Imposes unnecessary constraints on farming practices.</li> </ul>
Central Otago Environmental Society	1028	Support submission 287 ref. 211		<ul style="list-style-type: none"> <li>Effects-based strategy relies on a monitoring and compliance programme which leaves no room for ignorance or misunderstanding.</li> </ul>
Mr RJ Borst	1034	Oppose submission 287 ref. 211		<ul style="list-style-type: none"> <li>Not all waterways should have a high standard of water quality.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community	1043			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Incorporated</i>				
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Oppose submission 287 ref. 211		<ul style="list-style-type: none"> <li>• New schedule not proven appropriate or necessary, covered elsewhere in plan.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 287 ref. 211		<ul style="list-style-type: none"> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Andrea Clarke	305	Not Applicable	Clarify whether there will be a clear guideline for the implementation of the monitoring scheme of these limits to ensure monitoring of land-use activities by Council is fair and reasonable.	<ul style="list-style-type: none"> <li>• Potential difficulty in identifying individual land use activities that exceed Schedule 16 limits.</li> <li>• To ensure the monitoring of land-use activities by Council is fair and reasonable.</li> </ul>

### 219 Overall strategic approach

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hewett Farm Ltd	39	Not Applicable	Agree with the general principles of water quality for Otago.	<ul style="list-style-type: none"> <li>• Land use is not stipulated.</li> <li>• Pragmatic and flexible approach.</li> </ul>
Craig Werner	48	Not Applicable	Retain the current regulatory approach and add to it the proposal to do monitoring of water runoff quality at every property at multiple points.	<ul style="list-style-type: none"> <li>• Approach must be more stringent.</li> <li>• Discharges, land uses and nutrient inputs must be addressed to cope with the intensification of rural land use.</li> <li>• Failure to provide detail of testing programme.</li> <li>• 2020 compliance target to distant.</li> </ul>
Horticulture New Zealand	1032	Oppose submission 48 ref. 219		<ul style="list-style-type: none"> <li>• Impractical to monitor.</li> </ul>
University of Otago, Department of Zoology	57	Not Applicable	Amend description of "effects-based approach" in Introduction [to plan change document]. Better explain how this approach should work in practice given the existing workloads and resources of both the affected farmers and ORC staff.	<ul style="list-style-type: none"> <li>• Supports approach in principle but queries how will it work in practice.</li> <li>• Unrealistic to expect farmers to regularly collect discharge samples without frequent checks from ORC compliance staff and enforcement action.</li> <li>• Compliance would require considerable staff time and money. Could create resentment with farmers.</li> </ul>
Green Party (Dunedin Branch)	62	Not Applicable	If ORC is committed to restoring and protecting the natural values of each river, lake and wetland in Otago, which is its statutory responsibility, then it will have to reconsider its overall approach.	<ul style="list-style-type: none"> <li>• Land use controls should be used.</li> <li>• Does not address how to monitor and control non-point source pollution.</li> <li>• Relationship of water quality with river flows not considered.</li> </ul>
Craiglea Limited	1012	Oppose submission 62 ref. 219		<ul style="list-style-type: none"> <li>• No reason stated.</li> </ul>
Mr RJ Borst	1034			
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport	1038			



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 62 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Opposes land use rules.</i></li> <li>• <i>Requires more information on what activities are likely to be detrimental to water quality.</i></li> <li>• <i>Unnecessarily restrictive.</i></li> <li>• <i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Does not allow flexibility for existing farming operations to give effect to the NPS.</i></li> <li>• <i>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</i></li> <li>• <i>Does take into account local environmental conditions and economic/development consideration.</i></li> <li>• <i>Disproportionate and overly restrictive.</i></li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• Managing rural discharges with focus on controlling contaminants - theoretical knowledge and practical farming observations poles apart.</li> <li>• Not easily recognised where water might gather before leaving the farm.</li> <li>• Cost, reduced productive output, disincentives to overbearing and demanding proposal.</li> </ul>
Lower Waitaki Irrigation Company	106	Not Applicable	Support the principle of having an effects-based plan.	<ul style="list-style-type: none"> <li>• Submission relates to administration of such a plan.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 106 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Plan should adopt an effects-based approach.</i></li> </ul>
Jane Young	124	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• Benefits of effects-based strategy which allows greater scope for innovation and autonomy.</li> <li>• Issue around dependence on frequent expensive monitoring of discharges to met rules.</li> </ul>
Hawea Community Association	126	Not Applicable	ORC follow its mandate and manages the Hawea aquifer and our lake and rivers so that there is no deterioration of water quality and that everyone gets their fair share.	<ul style="list-style-type: none"> <li>• Main issue is changing land use due to increased population and dairy intensification.</li> <li>• What incentives for farmers to comply? Throughout NZ water continues to be polluted despite rules in place.</li> </ul>
Mt Aspiring Station	127	Not Applicable	Support overriding concept and use of effects based approach rather than controlling land use.	<ul style="list-style-type: none"> <li>• General support but some areas (detailed in submission) need to be further addressed.</li> </ul>
			Support the use of permitted activities for activities such as bridges	

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			in order to make it easier for land managers to contribute to improving water quality.	
Strathburn Limited	130	Not Applicable	Council has failed to identify and consider other forms of means to encourage changes in land use management.	<ul style="list-style-type: none"> <li>• Incorrectly based proposal on nature being always good and farmers always bad.</li> <li>• Balancing done by farmers in managing land and nature ensures good quality water.</li> </ul>
Waitaki District Council	138	Not Applicable	<p>Support the overall objectives of improving water quality in the Otago region for the environmental, cultural and recreational benefits.</p> <p>Concerned the manner proposed to manage water quality will have a significant detrimental effect on region's ability to deliver on economic outcomes.</p>	<ul style="list-style-type: none"> <li>• PPC6A doesn't acknowledge or take into account economic and social considerations.</li> <li>• Measures go far beyond those required to achieve stated environmental results.</li> </ul>
<i>B &amp; J Smith</i>	<i>1006</i>	<i>Support submission 138 ref. 219</i>		<ul style="list-style-type: none"> <li>• Rule goes far beyond those required to achieve stated environmental results</li> <li>• Lack of consideration of social and economic impacts.</li> </ul>
<i>Meridian Energy Limited</i>	<i>1014</i>	<i>Support submission 138 ref. 219</i>		<ul style="list-style-type: none"> <li>• Imbalance in the consideration of economic, social and environmental values.</li> <li>• Proposed Plan Change does not achieve sustainable management as defined in RMA Section 5(2).</li> </ul>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 138 ref. 219</i>		<ul style="list-style-type: none"> <li>• Consistent with DCC position.</li> <li>• Concern about economic and social impact.</li> <li>• Control measures of PC6A go far beyond those required to achieve the stated environmental results.</li> </ul>
<i>Otago Fish and Game Council</i>	<i>1027</i>	<i>Support in part submission 138 ref. 219</i>		<ul style="list-style-type: none"> <li>• Other measures, including voluntary provisions, have largely failed to address the decline of Otago's water quality.</li> <li>• More stringent rules, such as approach in PC6A are needed.</li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support in part submission 138 ref. 219</i>		<ul style="list-style-type: none"> <li>• Need to consider economic and social factors</li> </ul>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 138 ref. 219</i>		<ul style="list-style-type: none"> <li>• Areas of concern or support are consistent with those expressed by the NZTA.</li> <li>• Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</li> <li>• Seek the submission is allowed.</li> </ul>
Clutha Agricultural Development Board	139	Not Applicable	<p>Support for the merits of an effects-based approach over the rules/consents based approach.</p> <p>Emphasis for Council monitoring and enforcement should be solely on the quality of water measured in waterways, not in water that may get into waterways.</p> <p>Urge a continuation of a co-operative approach with all but the most intransigent of farmer polluters.</p>	<ul style="list-style-type: none"> <li>• Concerned about use of prohibitions.</li> <li>• Farming becomes problematic with prohibition of farming practices that may cause water quality degradation.</li> <li>• Effects of activities should be prohibited not the potential effects.</li> <li>• Consistency of effects-based approach needed.</li> <li>• Recent improvements in water quality haven't been made through unrealistic regulation that 'best practice' couldn't meet or put them out of business.</li> <li>• Throughout the consultation process, ORC indicated there would be monitoring and measurement tools for farmers. No such tools have been indicated.</li> </ul>
Eloise Neeley	141	Not Applicable	Revisit the proposed water plan changes to ensure that while we continue to achieve continued improvement in the state of our water that the plan change will not result in significant economic impacts on all who live in Otago.	<ul style="list-style-type: none"> <li>• Approve initiative to allow farmers to make their own decisions by measuring effects rather than imposing onerous consent requirements.</li> <li>• Doesn't provide enough certainty and confidence in compliance with changes with the current monitoring tools.</li> <li>• ORC doesn't know how changes will impact on the agricultural sector.</li> </ul>
Korteweg Family Trust	142	Not Applicable	Support and applaud the initiative in giving urban and rural sector the opportunity to take ownership of their discharges to waterways	<ul style="list-style-type: none"> <li>• Prefers this approach to that of other councils.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			and how they manage them.	
M L & P J Lord Family Trust	143	Not Applicable	Support the overall concept of the plan. Supports use of permitted activities.	<ul style="list-style-type: none"> <li>Concerned that costs to some individuals and communities will be too great.</li> </ul>
<i>Albert McTainsh</i>	<i>1004</i>	<i>Support submission 143 ref. 219</i>		<ul style="list-style-type: none"> <li><i>Practical alternatives &amp; more workable rules offered.</i></li> </ul>
Ernslaw One Ltd	149	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> <li>Support efforts to address contaminants in runoff, drainage and leaching.</li> <li>Support approach to effects-based management instead of controlling land use activities.</li> </ul>
Corona Farms Ltd	155	Not Applicable	Agree with the philosophy of the change.	<ul style="list-style-type: none"> <li>Less nutrients in waterways.</li> <li>More work needed on what modern border dyke systems can achieve.</li> <li>Not enough science invested in plan change.</li> <li>Would like to see border dyke watering still being a viable system.</li> </ul>
Nigel de Geest	157	Amend	Very supportive of what Council is trying to achieve however do believe the bar has been set too high in regard to discharge limits.	<ul style="list-style-type: none"> <li>Has environmental farm plan for sheep and beef farm on the Kakanui River, but still won't meet the discharge limits.</li> </ul>
Matuanui Ltd	163	Not Applicable	The ORC ideas to monitor farming practice is in the best interests of our future generations however the aggressive changes proposed in this document are unrealistic and not sustainable for the owner operated farmer.	<ul style="list-style-type: none"> <li>Agree with aim to maintain and enhance water quality.</li> <li>Agree with permitted activity approach.</li> <li>Significant concerns with practicality of sampling and achievability of Schedule 16 discharge limits.</li> </ul>
Jim Gibson	165	Not Applicable	Object to flawed proposal to allow the "community" to decide the quality of water.	<ul style="list-style-type: none"> <li>Views of non-farming community will stifle farming.</li> <li>Reasonable view from all parties needed.</li> </ul>
Peter McNab	192	Not Applicable	Support concept of protecting of enhancing our region's water quality and totally support the ORC stance of effects based policy rather than the act based policy.	<ul style="list-style-type: none"> <li>Issue is the costs and logistics of making changes to meet the standards, while ensuring animal welfare.</li> <li>Much of the best shelter in gullies.</li> <li>Long lead in period is required to meet targets sustainably - need support from ORC (not brutal enforcement).</li> </ul>
Irrigation New Zealand Incorporated	202	Not Applicable	Supports the 'effects-based' approach ORC has taken to managing within water quality limits.  The plan needs to be revisited, more clearly articulating what its objectives and policies are and what the expectations of the rules are.  Section 32 report - Review. Overall the analysis is high level and simplistic and needs to be revisited in greater depth -exploring a broader range of options.	<ul style="list-style-type: none"> <li>Provides flexibility.</li> <li>Allows catchment specific approach.</li> <li>Wording in plan change subjective, open to wide interpretation.</li> <li>Consistency, better understanding of implications, as well as monitoring and enforcement.</li> <li>Do not agree with evaluation of strategic approaches, or with setting contaminant limits vs catchment based load limits.</li> <li>Plan change doesn't allow communities to explore other approaches, such as cap and transfer mechanisms.</li> </ul>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 202 ref. 219</i>		<ul style="list-style-type: none"> <li><i>Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</i></li> </ul>
M C Holland Farming Ltd	207	Not Applicable	That PC6A needs substantial amendment before it is made operative.	<ul style="list-style-type: none"> <li>Section 32 does not adequately assess social and economic costs.</li> <li>Are targets and standards achievable without substantial change in land use.</li> </ul>
Blakely Pacific Limited	209	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> <li>Support efforts to address contaminants in runoff, drainage and leaching.</li> <li>Support approach to effects-based management instead of controlling land use activities.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 209 ref. 219</i>		<ul style="list-style-type: none"> <li><i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i></li> </ul>
Dunedin City Council	211	Not Applicable	Very supportive of the aims of maintaining the existing water quality in Otago and improving it where necessary.	<ul style="list-style-type: none"> <li>Good water quality supports environmental, economic, social and cultural values.</li> <li>Provides for sustainable management of Otago's resources.</li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support</i>		<ul style="list-style-type: none"> <li><i>No reason given.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 211 ref. 219</i>		
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 219</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>• Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>• Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> <li>• Activities should only be classified as 'prohibited' where they are likely to result in significant adverse effects.</li> </ul>
A P S Heckler Family Trust	218	Not Applicable	Support idea behind Plan Change.	<ul style="list-style-type: none"> <li>• Concerned with limitations, applications, and possible cost structure affecting our economic viability.</li> <li>• Timeframe set is unachievable.</li> </ul>
Hamish Anderson	221	Not Applicable	Agree with the ORC's plan to allow farmers to get on with farming provided their discharges as a result of their farming activities do not have major impact on waterways.	<ul style="list-style-type: none"> <li>• First principles seemed reasonable and understandable.</li> </ul>
Fulton Hogan Limited	222	Not Applicable	Seek to ensure certainty is provided across all activities, and not a select few.	<ul style="list-style-type: none"> <li>• Plan change is uncertain.</li> <li>• Inappropriate level of discretion retained by ORC.</li> <li>• Discharges with low environmental risk is prohibited.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 222 ref. 219</i>		<ul style="list-style-type: none"> <li>• Further clarification of the different terminology utilised and the activity status of proposed activities in Section 12 would be beneficial for resource users.</li> </ul>
Holcim (New Zealand) Limited	224	Not Applicable	Seek to ensure certainty is provided across all activities, and not a select few.	<ul style="list-style-type: none"> <li>• Level of uncertainty for activities not specifically addressed.</li> <li>• Inappropriate level of discretion retained by ORC.</li> <li>• Policies don't provide appropriate guidance.</li> <li>• Discharges that are low environmental risk are prohibited.</li> </ul>
Central Otago Environmental Society Inc	233	Not Applicable	Supports adoption of an effects-based strategy.	<ul style="list-style-type: none"> <li>• Notes continuing deterioration due to non-compliance with current plan.</li> <li>• Concerned that leaving water quality management with land managers alone is unrealistic.</li> <li>• Plan change ignores other important issues that affect water quality - water availability and land use intensification.</li> <li>• Plan must observe precautionary principle of "do no harm" and deny activities likely to risk water quality.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 233 ref. 219</i>		<ul style="list-style-type: none"> <li>• Submission requests stricter controls on agricultural activities without recognising social and economic effects such controls would have on farmers already potentially burdened with considerable compliance costs.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 233 ref. 219</i>		<ul style="list-style-type: none"> <li>• Plan should adopt an effects-based approach to managing rural discharges.</li> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Silver Fern Farms Limited	238	Not Applicable	Would like clarification on what the intention of the plan changes are.	<ul style="list-style-type: none"> <li>• Introduction gives impression PC6A based on Rural Water Strategy, but it covers more than rural and farming discharges.</li> </ul>
Richard Plunket	245	Not Applicable	In support of an effects-based plan.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Otago Commercial Fishing Sector	246	Not Applicable	ORC to discuss their approach with ECan to find ways of improving it.  Include land-use controls to support targets and objectives.	<ul style="list-style-type: none"> <li>• Concerned about effects-based approach.</li> <li>• Prefer the approach taken by ECan in its draft Land and Water Regional Plan.</li> <li>• Not confident that the approach will fully mitigate the problem of non-point source discharges.</li> <li>• Monitoring non point source discharges is a near impossible task.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 246 ref. 219</i>		<ul style="list-style-type: none"> <li>• Plan should adopt an effects-based approach to managing rural discharges.</li> <li>• Overly restrictive and disproportionate.</li> <li>• Does not take into account economic considerations.</li> </ul>
Ravensdown Fertiliser Co-operative	248	Not Applicable	Overall, support the intent of Proposed Plan Change 6A, and in	<ul style="list-style-type: none"> <li>• Community consultation undertaken by ORC was inadequate.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ltd			particular the intent to take an "effects-based" approach by permitting discharges that meet specified limits for nitrogen and phosphorus, and not to directly control land uses. Notwithstanding this, has concerns about a number of matters [outlined in submission].	<ul style="list-style-type: none"> <li>• Setting of discharges limits that aren't effects based.</li> <li>• Practicalities of sampling.</li> <li>• Removal of provision for mixing zones.</li> <li>• Activity status for discharges that cannot meet limits.</li> <li>• Use of Overseer.</li> <li>• Use of prohibited activity status.</li> <li>• Adequacy of Section 32 report.</li> <li>• Overly simplistic narrative in Schedule 15.</li> <li>• Source of discharge limits in Schedule 16, inequitable division into 2 areas.</li> <li>• Definition of fertiliser.</li> <li>• There was discrepancies in information provided, changes in view, inconsistencies in the N loading limits discussed and what appeared in the plan.</li> <li>• Concerned provisions have taken effect from notification date despite uncertainty regarding Schedule 15, Schedule 16, whether permitted activity standards can be met and what activity status is, if permitted can't be met.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 248 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Concern about the use of OVERSEER and the practicalities of sampling.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Section 32 assessment is inadequate.</i></li> <li>• <i>Rules need to be clear and unambiguous.</i></li> <li>• <i>Schedule 15 values are not well defined.</i></li> <li>• <i>Unclear how values will be determined consistently.</i></li> <li>• <i>Supports setting of catchment load limits.</i></li> <li>• <i>Imposed limits should be supported by Science and technical data.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
New Zealand Fertiliser Manufacturers Research Association Inc	252	Not Applicable	Overall, support the intent of Proposed Plan Change 6A, and in particular the intent to take an "effects-based" approach by permitting discharges that meet specified limits for nitrogen and phosphorus, and not to directly control land uses. Notwithstanding this, has concerns about a number of matters [outlined in submission].	<ul style="list-style-type: none"> <li>• Community consultation undertaken by ORC was inadequate.</li> <li>• Setting of discharges limits that aren't effects based.</li> <li>• Practicalities of sampling.</li> <li>• Removal of provision for mixing zones.</li> <li>• Activity status for discharges that cannot meet limits.</li> <li>• Use of Overseer.</li> <li>• Use of prohibited activity status.</li> <li>• Adequacy of Section 32 report.</li> <li>• Overly simplistic narrative in Schedule 15.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Source of discharge limits in Schedule 16, inequitable division into 2 areas.</li> <li>• Definition of fertiliser.</li> <li>• There was discrepancies in information provided, changes in view, inconsistencies in the N loading limits discussed and what appeared in the plan.</li> <li>• Concerned provisions have taken effect from notification date despite uncertainty regarding Schedule 15, Schedule 16, whether permitted activity standards can be met and what activity status is, if permitted can't be met.</li> </ul>
Mr RJ Borst	1034	Support submission 252 ref. 219		<ul style="list-style-type: none"> <li>• Section 32 assessment is inadequate.</li> <li>• Rules need to be clear and unambiguous.</li> <li>• Imposed limits should be supported by science and technical data.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Rayonier New Zealand Ltd	256	Not Applicable	Retain the current approach and incorporate changes to address issues identified.	<ul style="list-style-type: none"> <li>• Support efforts to address contaminants in runoff, drainage and leaching.</li> <li>• Support approach to effects-based management instead of controlling land use activities.</li> </ul>
B & J Smith	259	Not Applicable	Full support of improving on-farm management practices including stock restriction to waterways, the reduction of sediment in waterways and a heightened level of good on-farm management practices in regards to proactive nutrient management techniques and individual case-by-case monitoring.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
North Otago Irrigation Company	260	Not Applicable	Support maintaining and improving water quality, and the effects-based approach.	<ul style="list-style-type: none"> <li>• Policies and rules should be achievable, clear, and not compromise the economics of farming.</li> </ul>
John Webster	1063	Support submission 260 ref. 219		<ul style="list-style-type: none"> <li>• Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
Peter Mitchell	1064	Support submission 260 ref. 219		<ul style="list-style-type: none"> <li>• Support the NOIC submission in full.</li> </ul>
Ballance Agri-Nutrients Ltd	262	Not Applicable	Overall, support the intent of Proposed Plan Change 6A, and in particular the intent to take an "effects-based" approach by permitting discharges that meet specified limits for nitrogen and	<ul style="list-style-type: none"> <li>• Community consultation undertaken by ORC was inadequate.</li> <li>• Setting of discharges limits that aren't effects based.</li> <li>• Practicalities of sampling.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			phosphorus, and not to directly control land uses. Notwithstanding this, has concerns about a number of matters [outlined in submission].	<ul style="list-style-type: none"> <li>Removal of provision for mixing zones.</li> <li>Activity status for discharges that cannot meet limits.</li> <li>Use of Overseer.</li> <li>Use of prohibited activity status.</li> <li>Adequacy of Section 32 report.</li> <li>Overly simplistic narrative in Schedule 15.</li> <li>Source of discharge limits in Schedule 16, inequitable division into 2 areas.</li> <li>Definition of fertiliser.</li> <li>There was discrepancies in information provided, changes in view, inconsistencies in the N loading limits discussed and what appeared in the plan.</li> <li>Concerned provisions have taken effect from notification date despite uncertainty regarding Schedule 15, Schedule 16, whether permitted activity standards can be met and what activity status is, if permitted can't be met.</li> </ul>
<i>Mr RJ Borst</i> <i>Mr NS Mackenzie</i> <i>Mr BJ Graham</i> <i>Mr TR Michelle</i> <i>Dunedin International Airport Limited</i> <i>Mr DC Greer</i> <i>Mr RG &amp; Mrs SS Burdon</i> <i>Mr TE &amp; Mrs JA Craig</i> <i>Mr DJ &amp; Mrs JC Andrew</i> <i>Macraes Community Incorporated</i> <i>Mr GV &amp; Mrs RE Gardner</i> <i>Mr AWB Elliot</i> <i>Mrs J Hodge</i> <i>Mr RP &amp; Mrs RR Van Vught</i> <i>Mainland Poultry Limited</i> <i>Calder Stewart Industries Limited</i> <i>Clutha District Council</i> <i>Central Otago District Council</i> <i>Central Otago Wine Growers Association</i>	1034 1035 1036 1037 1038 1039 1040 1041 1042 1043 1044 1045 1046 1047 1048 1049 1050 1051 1054	Support submission 262 ref. 219		<ul style="list-style-type: none"> <li>Section 32 assessment is inadequate.</li> <li>Rules need to be clear and unambiguous.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Not Applicable	Regional controls on water quality should be introduced that enable dairy farming without disproportionate costs or inefficiencies.	<ul style="list-style-type: none"> <li>Dairy farming is an existing, permitted land use.</li> <li>Supports flexibility for farmers to make changes in their own way.</li> <li>Proposed effects-based approach accords with RMA and allows consideration of local environmental conditions and economic factors.</li> </ul>
Environmental Defence Society	267	Not Applicable	<p>Retain current approach to control discharges directly.</p> <p>Amend the proposed plan so it gives effect to the New Zealand Coastal Policy Statement, in particular policy 21.</p> <p>Amend the proposed plan so it gives effect to the NPSFW, in particular Objectives A1 and A2.</p>	<ul style="list-style-type: none"> <li>Discharge rules addressing point and non-point pollution are necessary under RMA Section 15.</li> <li>NZCPS requires plans to identify areas of coastal water which have deteriorated.</li> <li>ORC will need to work 'back up the catchment' in order to improve deteriorated areas of coastal water.</li> <li>NPS includes requirement to protect outstanding freshwater bodies and the significant values of wetlands.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose in part submission 267</i>		<ul style="list-style-type: none"> <li>Need for changes to how discharges are controlled in the Plan Change.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Horticulture New Zealand</i>	1032	<i>ref. 219</i> <i>Support in part submission 267 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>PC should give effect to NPSFW.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose in part submission 267 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Oppose suggestion all applications for resource consent should be publicly notified.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports plan change and use of prohibited activity status.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 267 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Inconsistent with relief sought by further submitter.</i></li> </ul>
<i>Horticulture New Zealand</i>	269	Not Applicable	A land use activity based approach more workable	<ul style="list-style-type: none"> <li>• Certainty and implementation should have been considered in selection of a strategic approach.</li> <li>• Had proposed limits been presented with Rural Water Quality Strategy, highly unlikely there would have been support.</li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Plan change is arbitrary and unworkable, will have substantial adverse impact on horticultural production. Horticulture already has self governing best practice for soil, water and nutrient management.</i></li> <li>• <i>Plan change is inconsistent with the NPSFW.</i></li> </ul>
Marc Schallenberg	270	Not Applicable	<p>Would like the ORC to adopt at least two different approaches - one for more sensitive catchments and one for catchments with greater assimilation capacity. As other regional councils (e.g. Waikato, Horizons, EBOP, ES) are discovering, one policy approach is not sufficient for all situations.</p> <p>The S 32 report should be peer reviewed by at least 2 experts from other Regional Councils. Suggest inviting people from Environment Waikato, Horizons, EBOP or Environment Southland to peer review</p>	<ul style="list-style-type: none"> <li>• More than one approach required to manage different water issues and situations.</li> <li>• Responsibilities for monitoring and decision-making should rest with Council.</li> <li>• Cannot expect lay people to properly collect samples, interpret data, and pay for measurements.</li> <li>• Strong need for expertise, rules and penalties to bring those breaching their responsibilities into line.</li> <li>• For sensitive catchments other approaches being used include nitrogen cap-and-trade, limitations on land-use development.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			the report as these councils are advancing in the way they manage water quality issues. The peer reviews should be made public and sent to all submitters.	<ul style="list-style-type: none"> <li>• S 32 report concludes effects-based approach warranted all Otago, however, proposal to turn over practical aspects of catchment management to communities questionable as they do not have expertise, incentives or access to measurement technologies. Will lead to "Tragedy of the Commons", where responsibilities for managing collective resource diffused to such an extent that prudent management not possible.</li> <li>• The cost-benefit analysis is not backed up by rigorous evidence (at least no references are given).</li> <li>• Conclusions of S 32 report need to be examined by independent experts and backed up by evidence.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 270 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Fish and Game (Central South Island)	273	Not Applicable	More alignment between Canterbury Water Management Strategy (CWMS) Zone of Implementation Programme and the Plan, to ensure CWMS targets met.	<ul style="list-style-type: none"> <li>• Lower Waitaki South Coastal Canterbury zone overlaps with area covered by plan change.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> <li>• <i>Affected by a variety of activities, not just agricultural uses.</i></li> <li>• <i>Imposes unnecessary constraints on farming practices.</i></li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 273 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Crucial that two Councils collaborate when developing planning frameworks and policies around land use and water quality.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways should have a high standard of water quality.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
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<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
T M and C M Scurr	275	Not Applicable	Section 5.5, Option 2 [Section 32 report] - A catchment by catchment standard and limits should apply.	<ul style="list-style-type: none"> <li>• Setting an Otago wide standard is not a good idea as Cardrona Valley has other characteristics.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Section 5.7, Option 2 [Section 32 report] - Out of the question to fence waterways and build thousands of crossings.	<ul style="list-style-type: none"> <li>• Stock movements in high country in their grazing habits and in season's movements essential. Have strong hard ground and no problems with mud.</li> </ul>
Wenita Forest Products	279	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> <li>• Support efforts to address contaminants in runoff, drainage and leaching.</li> <li>• Support approach to effects-based management instead of controlling land use activities.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 279 ref. 219</i>		<ul style="list-style-type: none"> <li>• Agree with submission in relation to Objectives and policies.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> </ul>
Sue Coutts	281	Not Applicable	Water Plan should be impartial and objective, needs to work for all sectors not just primary production.	<ul style="list-style-type: none"> <li>• Must consider the wide range of both use and intrinsic values.</li> <li>• Rules will affect more than just stated rural landholders. Landholders will feel impacts first but, longterm, wellbeing of all is affected.</li> <li>• High water quality is an asset to visitors, is a marketing advantage and is vital to an economy dependent on tourism.</li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Not Applicable	Strongly supports the intent of Plan Change 6A to maintain water quality, or improve it as necessary, through control of contaminants discharging from land to water.  Supports the Council's effort to improve water quality in the region, however, the plan change does not practically allow for primary production operations, such as forestry, to continue to operate if permitted activity rules cannot be complied with.	<ul style="list-style-type: none"> <li>• Plan outlines policies and objectives to identify and address declining water quality.</li> <li>• Failure to meet permitted status would lead to prohibition, even when all practicable measures have been taken to avoid, remedy or mitigate adverse environmental effects.</li> <li>• Would result in loss of economic, social and environmental benefits provided by forestry.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282 ref. 219</i>		<ul style="list-style-type: none"> <li>• Plan change should recognise the specific nature of plantation forestry.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> </ul>
City Forests Limited	283	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> <li>• Support efforts to address contaminants in runoff, drainage and leaching.</li> <li>• Support approach to effects-based management instead of controlling land use activities.</li> </ul>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 219</i>		<ul style="list-style-type: none"> <li>• Agree with submission in relation to Objectives and policies.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> </ul>
Oceana Gold (New Zealand) Limited	285	Not Applicable	Ensure provisions encourage innovation and the development of new technology.	Object to any plan change deters innovation and development of new technology addressing water quality management.
Fish and Game (Otago)	287	Not Applicable	Strongly supportive of the intent and philosophy behind this plan change.	<ul style="list-style-type: none"> <li>• Provisions will improve water quality.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 219</i>		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> <li>• Affected by a variety of activities, not just agricultural uses.</li> <li>• Imposes unnecessary constraints on farming practices.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 287 ref. 219</i>		<ul style="list-style-type: none"> <li>• Does support the intent and philosophy of PC6A.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 219</i>		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
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<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
Paterson Pitts Partners Ltd	288	Not Applicable	Supports general intent.	<ul style="list-style-type: none"> <li>• Concerned at lack of practical and effective tools for land managers to self measure non-point discharge from their land is a concern, especially relating to groundwater.</li> <li>• Enforcement practicalities are a concern, when limits exceeded</li> <li>• Very difficult to trace to an individual landowner where contaminated groundwater affects surface water.</li> </ul>
Southern Wood Council	289	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> <li>• Support efforts to address contaminants in runoff, drainage and leaching.</li> <li>• Support approach to effects-based management instead of controlling land use activities.</li> </ul>
Graylands Farms Ltd	302	Not Applicable	Support your stand that farming is a permitted activity and your aim to improve poor water quality.	No reason given.
Andrea Clarke	305	Not Applicable	Support overall intention of plan change 6A to reduce the contaminates entering waterways from non-point source pollution that result in a reduction of water quality within the Otago region.	<ul style="list-style-type: none"> <li>• Intensification in farming has resulted in increased sediment and nutrients in water.</li> </ul>
Central Otago District Council & Clutha District Council	309	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• Agree that water quality is important and needs to be managed carefully but concerned approach taken by the ORC will not achieve the purpose of the Act</li> <li>• Approach fails to provide for variations within catchments, social and economic factors, the use of best practicable options and allow for case-by-case assessment of environmental effects.</li> <li>• Proposal is more restrictive than required and imposes significant costs / restrictions on resource users including councils and ratepayers.</li> <li>• Section 32 does not justify the significant cost and restrictions of proposal.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 219</i>		<ul style="list-style-type: none"> <li>• <i>Agree with original submission on the overall strategic approach.</i></li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309</i>		<ul style="list-style-type: none"> <li>• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>ref. 219</i> <i>Support in part submission 309 ref. 219</i>		<ul style="list-style-type: none"> <li>• Clarification required to references of "good quality water" and "natural and human use values", particularly that this includes farming and related rural activities.</li> <li>• Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</li> <li>• Activities should only be prohibited when they have significant adverse environmental effects.</li> </ul>

## 220 Process

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Paul Martin	20	Not Applicable	Consultation process inadequate and doesn't meet local government requirements.	• Without access to all the documentation effective consultation is not feasible.
Isbister Farms Limited	123	Not Applicable	More time is allowed to conduct more research to support submission.	<ul style="list-style-type: none"> <li>• Not enough time given to make researched submission based on true consultative basis.</li> <li>• Process rushed despite significant economic consequences for individuals and community.</li> </ul>
Corona Farms Ltd	155	Not Applicable	Disagree with the timeframe and process of calculating what is acceptable.	• Not been adequate notice (between public meetings and closing date of submissions) to calculate what will land uses changes will be required to comply with the proposed plan and to calculate the costs associated with this.
Poplar Grove Station Ltd	208	Not Applicable	Needs greater consultation with more practical examples.	<ul style="list-style-type: none"> <li>• Compliance costs would dramatically affect farming outputs.</li> <li>• Difficult to understand practical application of changes.</li> </ul>
Dave Shaw	226	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• Only heard about changes from Federated Farmers on 18 April so didn't have time to mitigate with rules having immediate effect.</li> <li>• Should have heard about changes from ORC in the first instance.</li> </ul>
D J & N A McLaren	244	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• Poor communication from ORC on plan change.</li> <li>• Lack of awareness of farmers of changes and the future effect for their farming.</li> <li>• Financial implications from fencing of waterways.</li> </ul>

## 222 Beyond the scope - general

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Edna & Thomas Williams	1	Not Applicable	Don't sell the water off.	• Knows what ORC are up too.
Kelvin Milne	13	Not Applicable	Support bigger finds [fines].	• No reason given.
C J Downing	27	Not Applicable	ORC should tidy up existing issues instead of putting them in the too hard basket. Nothing has been done to fix lake weed in Lake Dunstan - fix it. Nothing has been done re Didymo in Clutha River from Wanaka - Lake Dunstan - fix it. Act now before it's too late.	• Signs at boat ramps and bottles of detergent a waste of time.
Donald Scott	30	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• Concerns relate to 7.C.2(a) [operative policy 7.7.4].</li> <li>• Sensitivity of receiving environment to adverse effects.</li> </ul>
A L Graves	31	Not Applicable	Re Alexandra area water supply. Could it be possible to - (a) de-lime it before it goes to consumer, or (b) find another source that does not have the lime.	• Alexandra water supply has too much lime in it.
Jeanette Spooner	32	Not Applicable	No decision requested.	• Mining uses water and causes pollution.
Alan G Cone & Judy Bagrie	38	Not Applicable	All testing [of Lagarosiphon control in Lake Wanaka] be peer reviewed.	<ul style="list-style-type: none"> <li>• Amount of Diquat being used.</li> <li>• How well it has been site tested on small aquatic creatures.</li> <li>• Edge fishing has been very poor since December as lack of insect and bully</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				life.
University of Otago, Department of Zoology	57	Not Applicable	Add an additional clause to 13.4.1.1 providing: (i) An assessment of freshwater fish values is completed in both the upstream and downstream areas of the structure. Make 13.4.1.1 a controlled or restricted discretionary activity, and then assess each area for freshwater fish values upon resource application, thereby allowing the Council to apply conditions ensuring the protection of native fish populations.	<ul style="list-style-type: none"> <li>• Poses a high risk to freshwater biodiversity.</li> <li>• Needs to be amended to provide adequate protection.</li> <li>• Removal of structure may unintentionally link fish populations e.g. Galaxiids and Trout.</li> </ul>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Oppose submission 57 ref. 222</i>		<ul style="list-style-type: none"> <li>• <i>Onerous, particularly where the watercourse is small and/or intermittently flowing.</i></li> <li>• <i>Unlikely to result in the further protection of native fish.</i></li> </ul>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Oppose submission 57 ref. 222</i>		<ul style="list-style-type: none"> <li>• <i>Requiring consent and assessment of freshwater fish values for demolition/removal of structures is onerous, particularly when the watercourse is small and/or intermittently flowing and the activity is unlikely to have an effect on freshwater fish values (if present).</i></li> <li>• <i>Requirements proposed are unlikely to result in the protection of native fish populations above what is achieved through the permitted activity.</i></li> <li>• <i>Seek that the submission is disallowed.</i></li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Not Applicable	No decision requested [regarding Section 13.4]	<ul style="list-style-type: none"> <li>• Yes.</li> </ul>
Clive Blumden	99	Not Applicable	Wish you to enforce the "don't use it lose it" rule [for water rights].	<ul style="list-style-type: none"> <li>• Some irrigate only once a year, so that they can say they have used it.</li> <li>• Large farms fragmented into small holdings, on 'paper' no available water for them, but in reality more than enough because water rights not being used.</li> </ul>
Mount Gowrie Station	136	Not Applicable	There needs to be water storage dams or reservoirs put in place on farms. Surplus to minimum water can be taken from rivers and streams. This water can be used for irrigation rather than taking from creeks and rivers, when water levels are already at their prudent recovery levels.	<ul style="list-style-type: none"> <li>• ORC too lenient with resource consents, allowing irrigators to pump water when rivers are struggling.</li> </ul>
Peter George	172	Not Applicable	More regulation of water use by farms and limiting supply as well as charging for irrigation that is often excessive.	<ul style="list-style-type: none"> <li>• Waterways being ruined for profit.</li> <li>• For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated.</li> <li>• Ignorance not an excuse.</li> </ul>
<i>Otago Water Resource Users Group</i>	<i>1056</i>	<i>Oppose submission 172 ref. 222</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessarily restrictive.</i></li> <li>• <i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
Preserve Our Water Society Inc	225	Not Applicable	Composting toilets added as permitted activity.	<ul style="list-style-type: none"> <li>• Will address concern regarding leaching of nitrates from septic tanks and could include conditions for installation.</li> </ul>
Forest and Bird	271	Not Applicable	Add the following as a Schedule  Schedule XX Ecological Criteria 1. Ecological Context The ecological context of the wetland has one or more of the following functions and or attributes: a. a role in protecting adjacent ecological values, including adjacent and downstream ecological and hydrological processes, indigenous vegetation, habitats or species populations; or b. is a habitat for critical life history stages of indigenous fauna including breeding/spawning, roosting, nesting, resting, feeding, moulting, refugia, migration staging points (as used seasonally, temporarily or permanently); or c. it contributes to ecological networks (such as connectivity and	<ul style="list-style-type: none"> <li>• Not all significant wetlands are identified.</li> <li>• Need to include a schedule of criteria for identifying wetlands.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>corridors for movement of indigenous fauna); or  d. it contributes to the ecological function and processes within the wetland.</p> <p>2. Representative Wetlands  A representative wetland is one that contains indigenous wetland vegetation types or indigenous fauna assemblages that were typical for, and has the attributes of, the relevant class of wetland as it would have existed prior to 1840.</p> <p>The criterion will be satisfied if the wetland (not including pakihī wetlands) contains indigenous wetland vegetation types that have the following attributes:  Either (a):  i. The indigenous wetland vegetation types that are typical in plant species composition and structure; and  ii. The condition of the wetland is what would have existed prior to 1840 in that:  <ul style="list-style-type: none"> <li>• indigenous species dominate; and</li> <li>• most of the expected species and tiers of the wetland vegetation type(s) are present</li> </ul> for the relevant class of wetland.</p> <p>Or (b):  The wetland contains indigenous fauna assemblages that:  <ul style="list-style-type: none"> <li>• are typical of the wetland class; and</li> <li>• indigenous species are present in most of the guilds expected for the wetland habitat type.</li> </ul> </p> <p>The representative wetland criterion applies to the whole or part of the wetland irrespective of land tenure.</p> <p>Each wetland is to be assessed at the ecological district and freshwater biogeographic unit scale.</p> <p>3. Rarity  The wetland satisfies this criterion if:  a. nationally threatened species(1) are present(2). or  b. nationally at risk species or uncommon communities or habitats are present and the population at this site has an important contribution to the national population and distribution of a species or number of at risk species or distribution and extent of threatened or uncommon communities or habitats.; or  c. regionally uncommon species are present; or  d. is a member of a wetland class that is now less than 30% of its original extent as assessed at the ecological district and the freshwater biogeographic unit scales; or  e. excluding pakihī, it contains wetland ecosystems that re identified as historically rare by Williams et al (2007).</p> <p>4. Distinctiveness  The wetland satisfies the distinctiveness criterion if it has special</p>	

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>ecological features of importance at the international, national, freshwater bio geographic unit or ecological district scale including:</p> <p>a. intact ecological sequences such as estuarine wetland systems adjoining tall forest species distribution limit; and</p> <p>b. an unusual characteristic (for example an unusual combination of species, wetland classes, wetland structural forms, or wetland landforms).</p> <p>Explanation The wetland classes may be determined in a number of ways including the classification index of Johnson and Gerbeaux (2004). Wetland indigenous vegetation types are identified with reference to the dominant plants species that are present, the structural class, wetland class and hydrosystem (see for example Johnson and Gerbeaux (2005)) or similar method.</p> <p>(1) The Threatened and At Risk categories are defined in the current version of the New Zealand threat classification system (Townsend et al 2008). Species are reassessed according to these categories approximately every three years.</p> <p>(2) For mobile species such as kotuku this requires some assessment of the importance of the site for the species i.e. the intention is not to include areas such as wet pasture where birds may be foraging.</p>	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 222</i>		<ul style="list-style-type: none"> <li>• <i>Not all waterways need to be enhanced.</i></li> <li>• <i>Background data required before any agricultural activities are restricted.</i></li> <li>• <i>Not practical to minimise the use of all beds and rivers and lakes and wetlands.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 271 ref. 222</i>		<ul style="list-style-type: none"> <li>• <i>Plan Change 2 determined regionally significant wetlands.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 222</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submission in that it supports retention of plan change and fails to recognise the cost of the plan change in its current form on the farming community.</i></li> </ul>

### 223 Riparian planting

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Colin Rawle	4	Not Applicable	All river banks should be replanted with suitable vegetation (not willows) to a width of perhaps 20 metres.	<ul style="list-style-type: none"> <li>• Cleared river banks with stock grazing are susceptible to erosion, slipping, silting and contamination.</li> <li>• Excrement, fertilisers, pesticides and herbicides become toxic run-off.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 4 ref. 223</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 4 ref. 223</i>		<ul style="list-style-type: none"> <li>• <i>Costly and impractical, who will fund this planting?</i></li> </ul>
Paul Martin	20	Not Applicable	Vital that riparian strips are mandated to be planted closely with a wide variety of native plants.	<ul style="list-style-type: none"> <li>• Creates barrier for mammals, filters effluent, reduces bank erosion.</li> </ul>
E J Munro	29	Not Applicable	Riparian strips should be compulsory on all waterways.	<ul style="list-style-type: none"> <li>• Voluntary measures do not stop degradation.</li> <li>• Dairying only allowed when safeguards are in place.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Green Party (Dunedin Branch)	62	Not Applicable	For dairy farms make mandatory the planting of riparian strips (10 metres wide) beginning in 2 years of the adoption of these rules and standards, and staggered over 10 years.	<ul style="list-style-type: none"> <li>Farming practice which would help meet water quality standards.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 223</i>		<ul style="list-style-type: none"> <li><i>Two year period is too short.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 62 ref. 223</i>		<ul style="list-style-type: none"> <li><i>Mandatory planting of riparian strips unnecessary and inappropriate.</i></li> <li><i>High cost to farming without clear benefit.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 62 ref. 223</i>		<ul style="list-style-type: none"> <li><i>Unnecessarily restrictive.</i></li> <li><i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 62 ref. 223</i>		<ul style="list-style-type: none"> <li><i>Dairy farms already doing fencing of waterways, an extra 10 metre strip of planting takes out operational land and goes beyond that necessary.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 62 ref. 223</i>		<ul style="list-style-type: none"> <li><i>Integrated riparian management is supported.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 62 ref. 223</i>		<ul style="list-style-type: none"> <li><i>No basis provided for extent of riparian strip. Riparian planting not always an appropriate action.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 223</i>		<ul style="list-style-type: none"> <li><i>Does not allow flexibility for existing farming operations to give effect to the NPS.</i></li> <li><i>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</i></li> <li><i>Does take into account local environmental conditions and economic/development consideration.</i></li> <li><i>Disproportionate and overly restrictive.</i></li> </ul>
David Botting	97	Not Applicable	The Council should take ownership (e.g. responsibility) of the land	<ul style="list-style-type: none"> <li>Farmers give up productive land for communal good, riparian planting</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			that has been fenced from stock e.g. weed and pest planting and release spraying. Council staff, including the CEO, might spend a day a month out in the field doing riparian plant maintenance, or Fish & Game or Forest & Bird etc could be on projects.	requires lots of maintenance at a busy time of year, farmers don't have the expertise.
Terisha Hubbard	181	Not Applicable	Would like the ORC to rule that any person who has a waterway (stream or river) running through their property provide a revegetated strip as a natural barrier and filtration area of 5 metres (or preferably 10 metres wide) on each side of the waterway.	<ul style="list-style-type: none"> <li>Waterways polluted, biodiversity degraded, natural areas lost.</li> <li>Dogs and children can no longer swim, drink or play in many areas.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Oppose submission 181 ref. 223</i>		<i>Unrealistic, involves substantial costs and loss of productive land. No scientific justification to should cost would produce sufficient benefits</i>

## 224 Fencing

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Nina Pennycuik	26	Not Applicable	Would like to see an exemption clause which people can apply for, for a reasonable fee, which allows people to present a case for them not being required to fence.	<ul style="list-style-type: none"> <li>Regulations for environmental damage caused by corporate style farming should not unfairly disadvantage small landholders.</li> </ul>
Jeanette Spooner	32	Support	Fencing to keep stock out. Would like to see work done with farmers to bring this in. Because of the cost maybe it could be brought in over time.	<ul style="list-style-type: none"> <li>Something needs to be done.</li> </ul>
Hewett Farm Ltd	39	Not Applicable	A more pragmatic solution to this [fencing] requirement needs to be found, including the ORC providing funds to fence/reticulate water if the ORC wishes to pursue a fencing/water reticulation timeline that a farmer cannot economically sustain, or will impact negatively on other farming investment priorities.	<ul style="list-style-type: none"> <li>Economically onerous for sheep and beef farmers: extensive farm size and amount of waterways.</li> <li>Need for reticulated water.</li> <li>Potential impact on existing county water schemes to keep up with demand.</li> <li>It would cost \$500,000 to fence off all waterways and reticulate water on our farm.</li> </ul>
J P Robertson	52	Not Applicable	Allow me to not fence the [Cardrona] river running through my farm as it is unfenceable.	<ul style="list-style-type: none"> <li>Stock have lots of drinking water (creeks and ponds) without using river.</li> <li>Stock spend 6 months with no access to river.</li> </ul>
Green Party (Dunedin Branch)	62	Not Applicable	For dairy farms make mandatory the fencing off of all waterways, staggered over 10 years.	<ul style="list-style-type: none"> <li>Farming practice which would help meet water quality standards.</li> </ul>
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose submission 62 ref. 224</i>		<ul style="list-style-type: none"> <li><i>Unnecessary and inappropriate.</i></li> <li><i>High level of cost to farming with no clear benefit.</i></li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>			
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ &amp; Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV &amp; Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			
<i>Mrs J Hodge</i>	<i>1046</i>			
<i>Mr RP &amp; Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			
<i>Calder Stewart Industries</i>	<i>1049</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 62 ref. 224</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessarily restrictive.</i></li> <li>• <i>Proposed plan change adequately addresses adverse effects.</i></li> <li>• <i>Fencing of all waterways would impose a significant financial and farm management burden on landowners.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 62 ref. 224</i>		<ul style="list-style-type: none"> <li>• <i>Integrated riparian management is supported.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 224</i>		<ul style="list-style-type: none"> <li>• <i>Does not allow flexibility for existing farming operations to give effect to the NPS.</i></li> <li>• <i>Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</i></li> <li>• <i>Does take into account local environmental conditions and economic/development consideration.</i></li> <li>• <i>Disproportionate and overly restrictive.</i></li> </ul>
Hawkdun Idaburn Irrigation Company Ltd	70	Not Applicable	Fencing our responsibility to decide.	<ul style="list-style-type: none"> <li>• Fencing of races for stock control our responsibility to decide - generally won't be fenced.</li> <li>• Race berms for access, water management, cleaning will remain private access.</li> <li>• Most gullies won't be fenced as they only carry intermittent flows.</li> <li>• Stock will have access to graze this valuable grass, has benefit of controlling excess growth.</li> </ul>
Alan McMillan	104	Not Applicable	Keeping all large farm animals out of these riparian areas by fencing must be a priority for your council in declaring it a prohibited activity.	<ul style="list-style-type: none"> <li>• Large farm animals must be denied direct access to waterways in order to meet the characteristics for 'banks' outlined in Schedule 15.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 104 ref. 224</i>		<ul style="list-style-type: none"> <li>• <i>No reasons given.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 104 ref. 224</i>		<ul style="list-style-type: none"> <li>• <i>Not workable, issues of cost-effectiveness.</i></li> </ul>
Stewart Morrison	116	Not Applicable	Support fencing of waterways.	<ul style="list-style-type: none"> <li>• Helps water quality in a number of ways.</li> </ul>
Mount Gowrie Station	136	Not Applicable	In favour of fencing around small tributaries or riparian areas.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Trust for the estate of W J Johnston	152	Not Applicable	Support fencing of waterways where practical.	<ul style="list-style-type: none"> <li>• ORC policy to allow meandering rivers while doing little or no flood protection maintenance work.</li> <li>• Flooding causes channel movement, making permanent fencing difficult.</li> <li>• Do not like to fence swimming holes as it restricts public access.</li> </ul>
Terisha Hubbard	181	Not Applicable	Would like the ORC to rule that any person who has a waterway (stream or river) running through their property fence this stream off so that no farm animals can get into the stream.	<ul style="list-style-type: none"> <li>• Waterways polluted, biodiversity degraded, natural areas lost.</li> <li>• Dogs and children can no longer swim, drink or plan in many areas.</li> </ul>
John Lee & Dennis Pezaro	254	Not Applicable	Farmers with beef herd should fence waterways where cattle are grazed, to protected water quality.	<ul style="list-style-type: none"> <li>• Beef have potential to damage banks and contaminate water.</li> <li>• Limited fencing could be used to restrict cattle access to pugging prone ground.</li> </ul>
Graham & Pam Hunter	332	Not Applicable	That sheep and beef farmers do not need to fence off waterways on hill country where stock units (SU) are under 5 SU per acre.	<ul style="list-style-type: none"> <li>• Fencing of waterways is unpractical and unworkable on steep hill country.</li> <li>• Concerned if there was a plan to have rules requiring fencing.</li> </ul>

## 226 Land use controls

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Patrick Alexander McGettigan	34	Not Applicable	Rule should say that when farms are being converted to different practices the owners need to apply for a resource consent.	<ul style="list-style-type: none"> <li>• Ensure land is suitable for new practices.</li> <li>• Current focus on symptoms, not cause.</li> <li>• Deterioration in water quality over last ten years.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 34 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>Opposes land use rules.</i></li> <li>• <i>Unnecessarily restrictive.</i></li> <li>• <i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
Craig Werner	48	Not Applicable	Proposed change 6A is to monitor water quality discharges and to delete control of land use practices and the level of nutrient inputs. I believe this is wrong. All three controls are needed to cope with the intensification of rural land use.	<ul style="list-style-type: none"> <li>• Intensification of rural land use.</li> </ul>
Melvyn Hollis	53	Not Applicable	Concerned about high intensity stock management on the Taieri Plain, where clay field tile drains are installed and would prefer that this practice is prohibited.	<ul style="list-style-type: none"> <li>• Field drains never intended to cope with large quantities of stock effluent.</li> <li>• Intensive grazing on saturated ground increases pollution runoff to Taieri River.</li> <li>• Waterway been degrading over past 40 years.</li> <li>• Implement a better way to graze high cow numbers</li> <li>• Allowing 21st century intensive grazing practises on 19th century farming practices for draining fields does not equate to improvement.</li> <li>• Should be addressed immediately.</li> </ul>
Green Party (Dunedin Branch)	62	Not Applicable	Acknowledge that intensive dairy farming is incompatible with good water quality without the introduction of a strong regulatory approach.  Dairying on sensitive aquifers should be a prohibited activity. It is essential that these issues [herd homes, animal welfare, effluent management] are addressed before dairying is established on a sensitive aquifer.	<ul style="list-style-type: none"> <li>• Hard to understand why ORC adamant it will not use RMA section 30(1)(c)(ii) allows land use control.</li> <li>• Inevitable cost to water quality from intensive land use, costs ultimately transferred to ratepayer when Councils monitor or remediate contaminated waterways.</li> <li>• Increase in irrigation and ability of river flows to assimilate run off.</li> <li>• Effects-based approach unlikely to protect water bodies at risk from development of dairying in association with new irrigation schemes.</li> <li>• Permissive approach does not protect water quality.</li> <li>• Admitted at ORC meeting that the only dairying that would meet sensitive aquifer discharge requirements would be herd sheds housing cows for 12 months, with feed cut and carried or supplements.</li> <li>• Effluent management impossible under such a regime, and animal welfare issues.</li> </ul>
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 62 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>Request is unnecessary and unreasonable, and would place undue restrictions on land uses.</i></li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 62 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>No evidence that dairying has any more impact on sensitive aquifers than other activities.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community</i>	1043			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Incorporated</i>				
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Otago Water Resource Users Group	1056	Oppose submission 62 ref. 226		<ul style="list-style-type: none"> <li>• Opposes land use rules.</li> <li>• Requires more information on what activities are likely to be detrimental to water quality.</li> <li>• Unnecessarily restrictive.</li> <li>• Proposed plan change adequately addresses adverse effects.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 62 ref. 226		<ul style="list-style-type: none"> <li>• Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>• Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>• Does take into account local environmental conditions and economic/development consideration.</li> <li>• Disproportionate and overly restrictive.</li> </ul>
Green Party (Dunedin Branch)	62	Not Applicable	It may be necessary for the ORC to require that winter feed is cut and carried to the stock in a place where the effluent can be captured.	<ul style="list-style-type: none"> <li>• N leaching from winter blocks a serious issue.</li> </ul>
Craiglea Limited	1012	Oppose submission 62 ref. 226		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 62 ref. 226		<ul style="list-style-type: none"> <li>• Opposes land use rules.</li> <li>• Requires more information on what activities are likely to be detrimental to water quality.</li> <li>• Unnecessarily restrictive.</li> <li>• Proposed plan change adequately addresses adverse effects.</li> </ul>
Alan McMillan	104	Not Applicable	No recognition of this potential problem [intensive stocking] is apparent in the amendment, nor is a remedy suggested.	<ul style="list-style-type: none"> <li>• Management of stock grazing rotation may reduce impacts of high contaminant concentrations from intensive stock numbers.</li> </ul>
Otago Fish and Game Council	1027	Support submission 104 ref. 226		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
Hawea Community Association	126	Not Applicable	Wish to see intensive dairy farming being treated as a discretionary activity until it is proven it can be managed otherwise.	<ul style="list-style-type: none"> <li>• Oppose the fact that in the Groundwater Protection Zone septic tanks require consent but intensive farming doesn't.</li> </ul>
Otago Water Resource Users Group	1056	Oppose submission 126 ref. 226		<ul style="list-style-type: none"> <li>• Proposed plan change adequately addresses adverse effects.</li> </ul>
Otago Conservation Board	140	Not Applicable	Only by proactively regulating those land use activities that pollute our waterways can the ORC prevent the deterioration of Otago's freshwater quality.	<ul style="list-style-type: none"> <li>• Reason given in decision requested.</li> </ul>
Mr RJ Borst	1034	Oppose in part submission 140 ref. 226		<ul style="list-style-type: none"> <li>• Not all waterways in Otago should be protected or enhanced. Many are affected by activities other than farming.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Peter George	172	Not Applicable	Limits on stock numbers.	<ul style="list-style-type: none"> <li>• Waterways being ruined for profit.</li> <li>• For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated.</li> <li>• Ignorance not an excuse.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 172 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessarily restrictive.</i></li> <li>• <i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
Central Otago Environmental Society Inc	233	Not Applicable	Include as an issue; the intensification of land uses increases the potential of adverse effects on waterways and therefore requires strict control, management and monitoring.	<ul style="list-style-type: none"> <li>• Increasing water supply encourages intensification, which heightens risk to water quality.</li> <li>• Effects-based strategy Increases cost environmentally and financially if it goes wrong.</li> <li>• Land use be controlled for precautionary approach.</li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 233 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>Submission requests stricter controls on agricultural activities without recognising social and economic effects such controls would have on farmers already potentially burdened with considerable compliance costs.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 233 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>Plan should adopt an effects-based approach to managing rural discharges.</i></li> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
David Blair	237	Not Applicable	Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> <li>• Consider carrying capacity for sensitive areas.</li> <li>• Consider destocking non-performing farmers.</li> </ul>
Otago Commercial Fishing Sector	246	Amend	Include relevant land-use controls in the Plan which, based on the best available scientific information, would support the proposed targets and objectives.	<ul style="list-style-type: none"> <li>• Will make the plan enforceable and provide certainty for land-users.</li> <li>• Not confident that the Plan would comply with NPSFW.</li> <li>• Plan needs to be enforceable and supported by methods and rules to avoid over-allocation.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 246 ref. 226</i>		<ul style="list-style-type: none"> <li>• <i>Plan should adopt an effects-based approach to managing rural discharges.</i></li> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>

## 227 Prohibitions - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
E J Munro	29	Support	Waterways need protection through prohibition of contaminants.	<ul style="list-style-type: none"> <li>• Voluntary measures do not stop degradation.</li> <li>• Dairying only allowed when safeguards are in place.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 29 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Oppose submissions seeking to retain prohibited status rules.</i></li> <li>• <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i></li> <li>• <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i></li> <li>• <i>With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand.</i></li> </ul>
Mosgiel Taieri Community Board	46	Amend	That the Plan must be clearer, able to be monitored efficiently and effectively and the proposed mitigation needs to be cost effective.	<ul style="list-style-type: none"> <li>• Rules pertaining to control of discharges such as overland run-off are uncertain and difficult to apply.</li> <li>• Uncertainty means difficult to be confident of compliance and manage risk.</li> <li>• Our area renowned for flooding.</li> </ul>
University of Otago, Department of Zoology	57	Amend	12.C.0: Replace "prohibited activities" with "non complying activities". Suggested that this section be revised as "non complying activities" with a stated preference towards public notification of applications for such activities.	<ul style="list-style-type: none"> <li>• Prohibited status rarely used as level of environmental effects to justify application is high.</li> <li>• Prohibited rules difficult to enforce.</li> <li>• Changing status will be deterrent for applications.</li> <li>• Will allow applications judged on unique circumstances.</li> <li>• More palatable to farming community.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 57 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited status high and inconsistent with RMA.</i></li> <li>• <i>Uncertainty around expectations makes rule unworkable and likely to add confusion.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 57 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited rules should be withdrawn.</i></li> <li>• <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 57 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</i></li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 57 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Support an activity status that reflects the potential effects of land use on water quality.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 57 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 57 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Proposed changes to Schedule 16 are disproportionate and overly restrictive.</i></li> </ul>
Green Party (Dunedin Branch)	62	Amend	For dairy farms make mandatory the prohibition of irrigation run off into creeks.	<ul style="list-style-type: none"> <li>• Farming practice which would help meet water quality standards.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>No reason given.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 62 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Not practicable to change land management so that there is no runoff of any irrigation into creeks.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Otago Water Resource Users Group	1056	Oppose submission 62 ref. 227		<ul style="list-style-type: none"> <li>• Unnecessarily restrictive.</li> <li>• Proposed plan change adequately addresses adverse effects.</li> <li>• Purpose of plan to prevent contaminated run-off, not all run-off.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 62 ref. 227		<ul style="list-style-type: none"> <li>• Difficult from operation perspective, prohibited status impractical.</li> </ul>
Alliance Group Limited	1060	Oppose submission 62 ref. 227		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
Fonterra Co-operative Group Limited	1068	Oppose in part submission 62 ref. 227		<ul style="list-style-type: none"> <li>• Already addressed in discharge provisions.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 62 ref. 227		<ul style="list-style-type: none"> <li>• Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>• Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>• Does take into account local environmental conditions and economic/development consideration.</li> <li>• Disproportionate and overly restrictive.</li> </ul>
Michael Rawlinson	121	Support	Maintain 12.C.0 rules as proposed (in particular 12.C.0.4).	<ul style="list-style-type: none"> <li>• Sediment discharge has destroyed former high quality trout habitat in both branches of the Waikouaiti River.</li> </ul>
Silver Fern Farms Limited	1070	Oppose submission 121 ref. 227		<ul style="list-style-type: none"> <li>• Oppose submissions seeking to retain prohibited status rules.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand.</li> </ul>
Jane Young	124	Support	Support 12.C.0 prohibited activities.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
Waitaki District Council	1003	Oppose submission 124 ref. 227		<ul style="list-style-type: none"> <li>• Submitter supports rule.</li> </ul>
Silver Fern Farms Limited	1070	Oppose submission 124 ref. 227		<ul style="list-style-type: none"> <li>• Oppose submissions seeking to retain prohibited status rules.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 124 ref. 227</i>		<ul style="list-style-type: none"> <li>• Activities should only be prohibited where they are likely to result in significant adverse effects.</li> </ul>
Waitaki District Council	138	Amend	Rules need to be rewritten to include subordination to the permitted and discretionary rules.	<ul style="list-style-type: none"> <li>• Wording of rules implies precedence over all the other rules: all discharges covered by this section would be prohibited, regardless of the proposed permitted and discretionary rules.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with DCC position.</li> <li>• Concern about economic and social impact.</li> <li>• Control measures of PC6A go far beyond those required to achieve the stated environmental results.</li> </ul>
<i>Otago Fish and Game Council</i>	1027	<i>Support in part submission 138 ref. 227</i>		<ul style="list-style-type: none"> <li>• Nothing on the order in the RMA that says that prohibited statutes cannot come first.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 138 ref. 227</i>		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
<i>Te Runanga o Ngai Tahu, Moeraki &amp; Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 138 ref. 227</i>		<ul style="list-style-type: none"> <li>• Support an activity status that reflects the potential effects of land use on water quality, subject to appropriate policy guidance and public notification.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 138 ref. 227</i>		<ul style="list-style-type: none"> <li>• Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 227</i>		<ul style="list-style-type: none"> <li>• Areas of concern or support are consistent with those expressed by the NZTA.</li> <li>• Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</li> <li>• Seek the submission is allowed.</li> </ul>
Dairy NZ Limited	146	Oppose	Withdraw the rule.	<ul style="list-style-type: none"> <li>• No analysis showing prohibitions most appropriate options</li> <li>• Vulnerable to legal challenge.</li> <li>• Many terms not defined.</li> <li>• If interpreted literally would include trivial discharges.</li> <li>• Need to define exactly so stakeholders know what to avoid.</li> <li>• Not appropriate to leave discretion with consent authority.</li> <li>• Rules have effect so persons vulnerable to legal action.</li> <li>• Need to provide stakeholders certainty.</li> <li>• Environment Court stated criteria be "clearly specified and capable of objective attainment".</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support in part</i>		<ul style="list-style-type: none"> <li>• Rule unclear.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		submission 146 ref. 227		
Forest and Bird NZ	1007	Oppose submission 146 ref. 227		<ul style="list-style-type: none"> <li>Prohibited status appropriate.</li> <li>Provides certainty as to when resource consents are needed.</li> <li>Most efficient status for listed activities.</li> </ul>
Rayonier New Zealand Limited	1015	Support in part submission 146 ref. 227		<ul style="list-style-type: none"> <li>Partly consistent with Rayonier's submission.</li> </ul>
Ernslaw One Ltd	1016	Support in part submission 146 ref. 227		<ul style="list-style-type: none"> <li>Partly consistent with Ernslaw One's submission.</li> </ul>
Environmental Defence Society	1055	Oppose submission 146 ref. 227		<ul style="list-style-type: none"> <li>Prohibited status is appropriate; most efficient status for the listed activities.</li> <li>Concerns that it will apply to trivial discharges can be addressed.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 146 ref. 227		<ul style="list-style-type: none"> <li>Prohibited status needs greater justification, lack of science behind decisions.</li> </ul>
TrustPower	1059	Support submission 146 ref. 227		<ul style="list-style-type: none"> <li>Prohibited rules should be withdrawn.</li> <li>Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
Alliance Group Limited	1060	Support submission 146 ref. 227		<ul style="list-style-type: none"> <li>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Oppose submission 146 ref. 227		<ul style="list-style-type: none"> <li>Support an activity status that reflects the potential effects of land use activities on water quality.</li> </ul>
Silver Fern Farms Limited	1070	Support in part submission 146 ref. 227		<ul style="list-style-type: none"> <li>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand.</li> <li>Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>
City Forests	1071	Support in part submission 146 ref. 227		<ul style="list-style-type: none"> <li>Partly consistent with City Forests's submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose in part submission 146 ref. 227		<ul style="list-style-type: none"> <li>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 146 ref. 227		<ul style="list-style-type: none"> <li>Activities should only be prohibited where they are likely to result in significant adverse effects.</li> <li>Provision should be made in transitional provisions for resource consents for existing discharges, even where those do not meet the proposed discharge limits.</li> </ul>
Ernslaw One Ltd	149	Amend	Remove prohibited activity status from the rules in PPC6A and replace it with Controlled Activity status for activities that are non-	<ul style="list-style-type: none"> <li>RMA enables people to undertake sustainable activities.</li> <li>If forestry cannot meet permitted then likely to be prohibited.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			compliant with Rule, as per MfE's proposed Plantation Forestry NES.	<ul style="list-style-type: none"> <li>Plan change prevents resource consent application.</li> <li>Prohibited status only used when effects cannot be avoided, remedied or mitigated.</li> <li>Insufficient justification to use prohibited status and inconsistent with case law.</li> <li>Out of proportion to potential adverse effects.</li> <li>Fails to account beneficial environmental effects.</li> <li>Initiate private plan changes.</li> <li>Significant departure from approaches used elsewhere.</li> </ul>
Waitaki District Council	1003	Support in part submission 149 ref. 227		<ul style="list-style-type: none"> <li>Rule makes all discharges prohibited.</li> </ul>
TrustPower	1059	Support submission 149 ref. 227		<ul style="list-style-type: none"> <li>Prohibited rules should be withdrawn.</li> <li>Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
Alliance Group Limited	1060	Support submission 149 ref. 227		<ul style="list-style-type: none"> <li>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
Fonterra Co-operative Group Limited	1068	Support submission 149 ref. 227		<ul style="list-style-type: none"> <li>Inappropriate use of prohibited activity status unnecessarily constraining appropriate activities.</li> </ul>
Alliance Group Limited	187	Oppose	Remove the proposed prohibited activity rules in Section 12.C.	<ul style="list-style-type: none"> <li>Proposed rules are uncertain and inappropriate.</li> <li>No limits or triggers to assess compliance or allowance for mixing zone, therefore inconsistent with RMA sections 5(2) and 107(1) and (2).</li> </ul>
Waitaki District Council	1003	Support submission 187 ref. 227		<ul style="list-style-type: none"> <li>Rule uncertain and inappropriate.</li> </ul>
Rayonier New Zealand Limited	1015	Support submission 187 ref. 227		<ul style="list-style-type: none"> <li>Consistent with Rayonier's submission.</li> </ul>
Ernslaw One Ltd	1016	Support submission 187 ref. 227		<ul style="list-style-type: none"> <li>Consistent with Ernslaw One's submission.</li> </ul>
Mr RJ Borst	1034	Support submission 187 ref. 227		<ul style="list-style-type: none"> <li>Supports removal of prohibited rules.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries	1049			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	Support submission 187 ref. 227		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	Support in part submission 187 ref. 227		<ul style="list-style-type: none"> <li>• Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>
<i>City Forests</i>	1071	Support submission 187 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
Dairy Holdings Limited	195	Amend	Opposed to the prohibited activity rule suite. Seeks the other matters raised [below in the reasons] to be addressed in any discretionary activity rule - after the current proposed rules have been withdrawn and an appropriately detailed analysis undertaken to identify a more appropriate set of rules that are technically justified and drafted to provide all parties with certainty about exactly what activities would be prohibited.	<ul style="list-style-type: none"> <li>• Default prohibited status inappropriate, contrary to good RMA practice.</li> <li>• Section 32 report and technical analysis do not justify need for, or implications of, prohibitions.</li> <li>• No environmental need for such a strict regime.</li> <li>• A number of acceptable activities (under Part II of the RMA) will now be prohibited, including those with no more than minor effects, e.g. a small increase in colour.</li> <li>• Compliance implications and obligations same for prohibited activities as for discretionary or non-complying.</li> <li>• Rule package lacks sufficient detail and is inappropriate - given the ambiguity, implied subjective considerations, vast coverage and uncertainties.</li> <li>• Term "any discharge of contaminants" all-inclusive, could automatically prohibit activities not covered in other rules.</li> <li>• Key phrases such as "ponding" not defined, ponding could be appropriate in some cases.</li> </ul>
<i>Waitaki District Council</i>	1003	Support in part submission 195 ref. 227		<ul style="list-style-type: none"> <li>• Rule uncertain and inappropriate.</li> </ul>
<i>Rayonier New Zealand Limited</i>	1015	Support submission 195 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
<i>Ermslaw One Ltd</i>	1016	Support submission 195 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with Ermslaw One's submission.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	Support submission 195 ref. 227		<ul style="list-style-type: none"> <li>• Submission outlines concern of further submitter.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	Support submission 195		<ul style="list-style-type: none"> <li>• Prohibited status needs greater justification, lack of science behind decisions.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 227</i>		
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Support in part, particularly regarding wider effect of the plan change.</i></li> <li>• <i>Although it doesn't request total withdrawal the submission recognises lack of specificity of controls and concern for lack of evidence supporting discharge limits, particularly given reliance on prohibited activity status.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 195 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i></li> <li>• <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i></li> <li>• <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i></li> <li>• <i>With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</i></li> </ul>
<i>City Forests</i>	1071	<i>Support submission 195 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with City Forest's submission.</i></li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</i></li> <li>• <i>Activities should only be prohibited where they are likely to have an adverse effect on the environment.</i></li> </ul>
Irrigation New Zealand Incorporated	202	Oppose	Rules 12.C.0.1 - 5 - Withdraw	<ul style="list-style-type: none"> <li>• <i>Subjectivity in prohibited activities.</i></li> <li>• <i>Land users need certainty.</i></li> <li>• <i>Open to interpretation.</i></li> <li>• <i>Restricted discretionary or non-complying better.</i></li> <li>• <i>ORC needs to recognise complexities of water quality.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 202 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Rules uncertain and confusing.</i></li> <li>• <i>Lack of fairness as to differing catchment and farm types.</i></li> <li>• <i>Science doesn't justify stringent measures.</i></li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 202 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited rules should be withdrawn.</i></li> <li>• <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 202 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 202 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i></li> <li>• <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i></li> <li>• <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i></li> <li>• <i>With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</i></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Trustpower Limited	206	Amend	Revise all other prohibited activity statuses.	<ul style="list-style-type: none"> <li>• Oppose the prohibited statuses proposed in the Plan Change.</li> <li>• Without significant justification and cost/benefit analysis, remove prohibited status.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited activity controls overly restrictive: prohibit discharges with minor effects on water quality.</i></li> <li>• <i>Opposes rules inconsistent with RMA.</i></li> </ul>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with Rayonier's submission.</i></li> </ul>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with Ernslaw One's submission.</i></li> </ul>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Prohibition activity status inappropriate.</i></li> <li>• <i>Lack of justification in the cost/benefit analysis.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Prohibited status high and inconsistent with RMA.</i></li> <li>• <i>Uncertainty around expectations makes rule unworkable and likely to add confusion.</i></li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</i></li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Inappropriate use of prohibited activity status unnecessarily constraining appropriate activities.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i></li> <li>• <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i></li> <li>• <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i></li> <li>• <i>With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</i></li> </ul>
<i>City Forests</i>	1071	<i>Support submission 206 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Consistent with City Forest's submission.</i></li> </ul>
M C Holland Farming Ltd	207	Amend	The prohibited activity rules are revised to recognise that some of the activities currently prohibited only have minor effects on water quality and hence should not be prohibited.	<ul style="list-style-type: none"> <li>• Rules very stringent.</li> <li>• Rule 12.C.0.2 allows no decrease in visual clarity whatsoever.</li> <li>• Rule 12.C.0.3 allows no erosion, likely to be impossible to met.</li> <li>• Adverse effects may only be no more than minor and localised.</li> </ul>
Blakely Pacific Limited	209	Oppose	Remove prohibited activity status from the rules in PPC6A and replace it with controlled activity status.	<ul style="list-style-type: none"> <li>• RMA enables people to undertake sustainable activities.</li> <li>• Prohibitions should be introduced only if there is clear evidence of adverse effects that can't be appropriately managed.</li> <li>• Failure to comply with permitted activities will result in forestry being a prohibited activity.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 227</i>		<ul style="list-style-type: none"> <li>• <i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i></li> </ul>
Dunedin City Council	211	Amend	Rewrite to include subordination to the permitted and discretionary	<ul style="list-style-type: none"> <li>• All discharges under section would be prohibited regardless of permitted and</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			rules.	discretionary rules.
<i>Waitaki District Council</i>	1003	<i>Support submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Rule needs to include subordination to permitted and discretionary rules.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Agree with submissions in relation to discharge rules and prohibited discharges.</li> <li>• Section 32 analysis was inadequate.</li> <li>• Prohibitions are overly restrictive and have unintended application due to schedule 16 limits.</li> </ul>
<i>Central Otago District Council</i>	1051	<i>Support submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Agree with submissions in relation to discharge rules and prohibited discharges.</li> <li>• Section 32 analysis was inadequate.</li> <li>• Prohibitions are overly restrictive and have unintended application due to schedule 16 limits.</li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Agree with submissions in relation to discharge rules and prohibited discharges.</li> <li>• Section 32 analysis was inadequate.</li> <li>• Prohibitions are overly restrictive and have unintended application due to schedule 16 limits.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited status high and inconsistent with RMA.</li> <li>• Uncertainty around expectations makes rule unworkable and likely to add confusion.</li> <li>• Conflict between prohibited and permitted activity status on rules.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 227</i>		<ul style="list-style-type: none"> <li>• Activities should only be prohibited where they are likely to result in significant adverse effects.</li> </ul>
<i>Silver Fern Farms Limited</i>	238	Oppose	Withdraw prohibited activity rules 12.C.0.1 - 12.C.0.5  In the alternative, change the activity status of these rule to discretionary.	<ul style="list-style-type: none"> <li>• No provision for reasonable mixing.</li> <li>• Would make our consented discharge prohibited.</li> <li>• Unreasonable and unjust.</li> <li>• No analysis why prohibition most appropriate option.</li> <li>• Many terms not well defined.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 238 ref. 227</i>		<ul style="list-style-type: none"> <li>• Makes discharge prohibited.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 238 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 238 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 238 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited status high and inconsistent with RMA.</li> <li>• Uncertainty around expectations makes rule unworkable and likely to add confusion.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 238 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 238 ref. 227</i>		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
<i>City Forests</i>	1071	<i>Support submission 238 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
Meridian Energy Limited	251	Oppose	Withdraw the proposed prohibited activity rules from the Plan Change, or rework them and amend the activity status.	<ul style="list-style-type: none"> <li>• Inconsistent with RMA Ss 5(2), 107(1) and (2).</li> <li>• Prevent discharge permits that meet S 107(2) from being granted.</li> <li>• Set idealistic water quality outcomes, without providing for community social and economic wellbeing to be considered, evaluated and appropriately determined.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Makes discharge prohibited.</li> </ul>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited activity status should be withdrawn or reworked.</li> <li>• Some prohibited discharges may be consistent with RMA S5(2), 1007(1)&amp;(2).</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• For the reasons given by the submitter.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited status high and inconsistent with RMA.</li> <li>• Uncertainty around expectations makes rule unworkable and likely to add confusion.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 251 ref. 227</i>		<ul style="list-style-type: none"> <li>• Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>
City Forests	1071	Support submission 251 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
Rayonier New Zealand Ltd	256	Oppose	Remove prohibited activity status from the rules in PPC6A and replace it with controlled activity standard.	<ul style="list-style-type: none"> <li>• RMA enables people to undertake sustainable activities.</li> <li>• If forestry cannot meet permitted then likely to be prohibited.</li> <li>• If forestry cannot meet permitted then likely to be prohibited.</li> <li>• Plan change prevents resource consent application.</li> <li>• Prohibited status only used when effects cannot be avoided, remedied or mitigated.</li> <li>• Insufficient justification to use prohibited status and inconsistent with case law.</li> <li>• Out of proportion to potential adverse effects.</li> <li>• Fails to account beneficial environmental effects.</li> <li>• Initiate private plan changes.</li> <li>• Significant departure from approaches used elsewhere.</li> </ul>
Waitaki District Council	1003	Support submission 256 ref. 227		<ul style="list-style-type: none"> <li>• Makes discharge prohibited.</li> </ul>
Federated Farmers of New Zealand	1057	Support in part submission 256 ref. 227		<ul style="list-style-type: none"> <li>• Prohibited status high and inconsistent with RMA.</li> <li>• Uncertainty around expectations makes rule unworkable and likely to add confusion.</li> </ul>
North Otago Irrigation Company	260	Amend	<p>Prohibited activities needs to be clearly defined to give land users certainty as to what is and what is not prohibited.</p> <p>These activities should generally be non-complying activity rather than prohibited.</p>	<ul style="list-style-type: none"> <li>• Rules too subjective, literal interpretation - many minor discharges prohibited.</li> </ul>
Waitaki District Council	1003	Support submission 260 ref. 227		<ul style="list-style-type: none"> <li>• Makes discharge prohibited.</li> </ul>
Rayonier New Zealand Limited	1015	Support submission 260 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
Ernslaw One Ltd	1016	Support submission 260 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 260 ref. 227		<ul style="list-style-type: none"> <li>• Prohibited status high and inconsistent with RMA.</li> <li>• Uncertainty around expectations makes rule unworkable and likely to add confusion.</li> </ul>
John Webster	1063	Support submission 260 ref. 227		<ul style="list-style-type: none"> <li>• Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
Peter Mitchell	1064	Support submission 260 ref. 227		<ul style="list-style-type: none"> <li>• Support the NOIC submission in full.</li> </ul>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
City Forests	1071	Support submission 260 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
Environmental Defence Society	267	Amend	Amend the rule so it is clearer as to when it applies and what discharges it applies to.	<ul style="list-style-type: none"> <li>• Rule should be clear and not alleged to be ultra vires.</li> <li>• For example "When the discharge is about to enter water" is ambiguous.</li> </ul>
Contact Energy Limited	1013	Oppose submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Supports greater clarity is desirable.</li> <li>• The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</li> </ul>
Rayonier New Zealand Limited	1015	Support submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
Ernslaw One Ltd	1016	Support submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
Mr RJ Borst	1034	Support in part submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
TrustPower	1059	Oppose submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
Alliance Group Limited	1060	Oppose submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Oppose submission in that it supports plan change and use of prohibited activity status.</li> </ul>
City Forests	1071	Support submission 267 ref. 227		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being	1074	Oppose		<ul style="list-style-type: none"> <li>• Inconsistent with relief sought by further submitter.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>partners of the Dairy Farms Partnership</i>		<i>submission 267 ref. 227</i>		
Horticulture New Zealand	269	Oppose	That Rules 12.C.0 be deleted and a detailed analysis undertaken to identify a more appropriate set of rules that are technically justified which provides certainty and clarity about exactly what activities would be prohibited.	<ul style="list-style-type: none"> <li>• Broad, contain terms that are not well defined.</li> <li>• Many activities may be classed as prohibited as lack of certainty.</li> <li>• Not appropriate effects based planning.</li> <li>• Prohibited activity rules need to be certain, specific and clear, and no discretion to ORC.</li> <li>• Unclear if analysis undertaken to show rules most efficient and effective means of meeting objectives.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Supports the carrying out of a robust Section 32 report to inform amendments of the rules in Section 12C.</li> </ul>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with Rayonier's submission.</li> </ul>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with Ernslaw One's submission.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited status high and inconsistent with RMA.</li> <li>• Uncertainty around expectations makes rule unworkable and likely to add confusion.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Measurement process to establish N level/ha unworkable.</li> <li>• Landuse management not the ORC's role.</li> <li>• Cost to implement the plan change will be huge.</li> <li>• If there is valid need to restrict N usage in specific areas this should be developed in consultation with land users and sectors, not by imposition.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>
<i>City Forests</i>	1071	<i>Support submission 269 ref. 227</i>		<ul style="list-style-type: none"> <li>• Consistent with City Forest's submission.</li> </ul>
Wenita Forest Products	279	Oppose	Remove prohibited activity status from the rules in PPC6A and replace it with restricted discretionary activity standard.	<ul style="list-style-type: none"> <li>• RMA enables people to undertake sustainable activities.</li> <li>• Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed.</li> <li>• Failure to comply will lead to forestry being a prohibited activity.</li> </ul>
<i>Calder Stewart Industries</i>	1049	<i>Support</i>		<ul style="list-style-type: none"> <li>• Rules in 12.C need to be more precise and further clarity is needed for activity</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Limited		submission 279 ref. 227		status of activities that breach the rules. <ul style="list-style-type: none"> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> </ul>
Federated Farmers of New Zealand	1057	Support in part submission 279 ref. 227		<ul style="list-style-type: none"> <li>• Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</li> </ul>
TrustPower	1059	Support submission 279 ref. 227		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
Alliance Group Limited	1060	Support submission 279 ref. 227		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Oppose	Strongly oppose the use of prohibited activity status.	<ul style="list-style-type: none"> <li>• RMA enables people to undertake sustainable activities.</li> <li>• Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed.</li> <li>• Failure to comply will lead to forestry being a prohibited activity.</li> <li>• Insufficient justification for the use of prohibited status and approach is inconsistent with case law authority.</li> </ul>
Calder Stewart Industries Limited	1049	Support submission 282 ref. 227		<ul style="list-style-type: none"> <li>• Plan change should recognise the specific nature of plantation forestry.</li> <li>• Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 282 ref. 227		<ul style="list-style-type: none"> <li>• Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</li> </ul>
TrustPower	1059	Support submission 282 ref. 227		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
Alliance Group Limited	1060	Support submission 282 ref. 227		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
City Forests Limited	283	Oppose	Remove prohibited activity status from the rules in PPC6A and replace it with Controlled Activity status for activities that are non-compliant with Rule, as per MfE's proposed Plantation Forestry NES.	<ul style="list-style-type: none"> <li>• RMA enables people to undertake sustainable activities.</li> <li>• Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed.</li> <li>• Failure to comply will lead to forestry being a prohibited activity.</li> </ul>
Calder Stewart Industries Limited	1049	Support submission 283 ref. 227		<ul style="list-style-type: none"> <li>• Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules.</li> <li>• Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</li> <li>• Matters relating to reasonable mixing need to be reconsidered.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 283 ref. 227		<ul style="list-style-type: none"> <li>• Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</li> </ul>
TrustPower	1059	Support submission 283 ref. 227		<ul style="list-style-type: none"> <li>• Prohibited rules should be withdrawn.</li> <li>• Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
Alliance Group Limited	1060	Support submission 283		<ul style="list-style-type: none"> <li>• Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 227</i>		<i>management of natural and physical resources.</i>
Contact Energy Limited	284	Amend	Rules 12.C.0.1 - 12.C.0.4 should be categorised as non-complying activities rather than prohibited activities and be expressed to be subject to the rules in the balance of section 12.C.	<ul style="list-style-type: none"> <li>Absence of reasons for rules suggests insufficient consideration was given to the situations that may or may not apply in a prohibited activity.</li> <li>Uncertain if it accounts for situation of water taken then discharged.</li> </ul>
<i>Forest and Bird NZ</i>	<i>1007</i>	<i>Oppose submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Prohibited status is more appropriate for these activities which are likely to result in significant adverse effects on water quality.</i></li> </ul>
<i>Rayonier New Zealand Limited</i>	<i>1015</i>	<i>Support submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Consistent with Rayonier's submission.</i></li> </ul>
<i>Ernslaw One Ltd</i>	<i>1016</i>	<i>Support submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Consistent with Ernslaw One's submission.</i></li> </ul>
<i>New Zealand Wind Energy Association</i>	<i>1030</i>	<i>Support in part submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Supports the request to amend the activity status.</i></li> <li><i>Moreover, the non-complying activity status is not appropriate for a renewable electricity generation activity.</i></li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</i></li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Prohibited rules should be withdrawn.</i></li> <li><i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i></li> </ul>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</i></li> </ul>
<i>City Forests</i>	<i>1071</i>	<i>Support submission 284 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Consistent with City Forest's submission.</i></li> </ul>
Cardrona Land Care Group	286	Oppose	Oppose.	<ul style="list-style-type: none"> <li>Prohibited activity removes ability for a resource consent to be made or considered on merits and effects of the activity.</li> <li>Prohibited status of rules not supported by objectives and policies or adequately assessed in Section 32.</li> </ul>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 286 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Prohibited rules should be withdrawn.</i></li> <li><i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i></li> </ul>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 286 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</i></li> </ul>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 286 ref. 227</i>		<ul style="list-style-type: none"> <li><i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i></li> <li><i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i></li> <li><i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i></li> <li><i>With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand.</i></li> <li><i>Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</i></li> </ul>
Fish and Game (Otago)	287	Support	Retain [prohibited activity] rules as proposed.	<ul style="list-style-type: none"> <li>12C rules conditionally supported provided they are enforceable, and technically practicable.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Waitaki District Council	1003	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Prohibited rules are excellent; good to present them first.</li> <li>Submitter supports rule.</li> </ul>
Craiglea Limited	1012	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Not all waterways should have a high standard of water quality.</li> <li>Affected by a variety of activities, not just agricultural uses.</li> <li>Imposes unnecessary constraints on farming practices.</li> </ul>
Meridian Energy Limited	1014	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Rules in their current form do not promote sustainable management and are inconsistent with the RMA.</li> </ul>
Rayonier New Zealand Limited	1015	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Inconsistent with Rayonier's submission.</li> </ul>
Ernslaw One Ltd	1016	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Inconsistent with Ernslaw One's submission.</li> </ul>
Mr RJ Borst	1034	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Unnecessary constraints on farming practices.</li> </ul>
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
TrustPower	1059	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Prohibited rules should be withdrawn.</li> <li>Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
Alliance Group Limited	1060	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
City Forests	1071	Oppose submission 287 ref. 227		<ul style="list-style-type: none"> <li>Inconsistent with City Forest's submission.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms	1074	Oppose submission 287		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Partnership</i>		<i>ref. 227</i>		
Southern Wood Council	289	Amend	Remove prohibited activity status from the rules in PPC6A and replace it with Controlled Activity status for activities that are non-compliant with Rule, as per MfE's proposed Plantation Forestry NES.	<ul style="list-style-type: none"> <li>RMA enables people to undertake sustainable activities.</li> <li>Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed.</li> <li>Failure to comply will lead to forestry being a prohibited activity.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 289 ref. 227</i>		<ul style="list-style-type: none"> <li>Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 289 ref. 227</i>		<ul style="list-style-type: none"> <li>Prohibited rules should be withdrawn.</li> <li>Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 289 ref. 227</i>		<ul style="list-style-type: none"> <li>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
Clutha District Council	308	Oppose	Replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> <li>Removes all ability for consent to be granted and scope for case-by-case assessment.</li> <li>Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work.</li> <li>Inconsistent with RMA section 107.</li> <li>Objectives and policies do not support prohibited activity status.</li> <li>Section 32 assessment inadequate.</li> </ul>
<i>Waitaki District Council</i>	1003	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>Makes discharge prohibited.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>Reasons stated in the submission.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>Agree that prohibited status not required and should be replaced with discretionary.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA, NPS and RPS.</li> <li>Need scope for case by case assessments.</li> </ul>
<i>TrustPower</i>	1059	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>Prohibited rules should be withdrawn.</li> <li>Overly restrictive and inconsistent with achieving the purpose of the RMA.</li> </ul>
<i>Alliance Group Limited</i>	1060	<i>Support submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>Alliance supports the withdrawal of the prohibited activity rules (and opposes their inclusion). They are overly restrictive and will not achieve the sustainable management of natural and physical resources.</li> </ul>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 308 ref. 227</i>		<ul style="list-style-type: none"> <li>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>
The NZ Transport Agency	1073	Support submission 308 ref. 227		<ul style="list-style-type: none"> <li>• Seek that the submission be allowed and the Plan Change amended as per the submission.</li> </ul>
Ben Graham	311	Oppose	Replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> <li>• Removes all ability for consent to be granted and scope for case-by-case assessment.</li> <li>• Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work.</li> <li>• Inconsistent with RMA section 107.</li> <li>• Objectives and policies do not support prohibited activity status.</li> <li>• Section 32 assessment inadequate.</li> </ul>
Waitaki District Council	1003	Support submission 311 ref. 227		<ul style="list-style-type: none"> <li>• Makes discharge prohibited.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 311 ref. 227		<ul style="list-style-type: none"> <li>• Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA, NPS and RPS.</li> <li>• Need scope for case by case assessments.</li> </ul>
Silver Fern Farms Limited	1070	Support in part submission 311 ref. 227		<ul style="list-style-type: none"> <li>• Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</li> <li>• Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</li> <li>• Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</li> <li>• With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand. Silver Fern Farms supports submitter in part, in terms of the intent of withdrawing the rules, but is neutral on the other aspects of the submissions.</li> </ul>

### 228 Permitted contaminant discharges - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mosgiel Taieri Community Board	46	Amend	That the Plan must be clearer, able to be monitored efficiently and effectively and the proposed mitigation needs to be cost effective.	<ul style="list-style-type: none"> <li>• Rules pertaining to control of discharges to groundwater and overland run-off are uncertain and difficult to apply.</li> <li>• Uncertainty means difficult to be confident of compliance and manage risk.</li> <li>• Our area renowned for flooding.</li> </ul>
Korteweg Family Trust	142	Did not specify	Major concern is whether we can realistically achieve the objectives set out by the ORC regarding nutrient loadings.	<ul style="list-style-type: none"> <li>• Concerned about remaining commercially competitive and viable.</li> <li>• When things go wrong as a result of weather conditions there is no or little provision for avoiding an infringement fine or court action.</li> </ul>
Federated Farmers of New Zealand	1057	Support submission 142 ref. 228		<ul style="list-style-type: none"> <li>• Must be stronger links between discharge compliance and environmental improvements.</li> <li>• Needs to be more science informed decision making.</li> </ul>
Ernslaw One Ltd	149	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> <li>• Insufficient consideration given to the impacts on forestry sector.</li> <li>• Fails to provide a default standard in event of non-compliance.</li> <li>• Need to provide clarity and certainty.</li> </ul>
Nigel de Geest	157	Amend	Amend.	<ul style="list-style-type: none"> <li>• The bar has been set too high.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Current sheep and beef farming practices using environmental plan will not meet discharge limits.</li> </ul>
Peter George	172	Amend	Far tighter limits on discharges.	<ul style="list-style-type: none"> <li>• Waterways being ruined for profit.</li> <li>• For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated.</li> <li>• Ignorance not an excuse.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 172 ref. 228</i>		<ul style="list-style-type: none"> <li>• <i>Unnecessarily restrictive.</i></li> <li>• <i>Proposed plan change adequately addresses adverse effects.</i></li> </ul>
Ewing Farms Ltd & Haddington Farms Ltd	177	Amend	Need benchmarks that are attainable for specific - these need to be discretionary.	<ul style="list-style-type: none"> <li>• Standards unattainable for many, may force people out of business or their homes.</li> <li>• Need benchmark to work towards, not against.</li> <li>• Defeats the purpose if everyone gets around problem by applying for consent.</li> </ul>
Mitchell & Webster Ltd	186	Support	Support the principle of allowing permitted activities with conditions that relate to that activity.	<ul style="list-style-type: none"> <li>• Saves consents, bureaucracy and time, lets land owners get on with activities.</li> </ul>
Ian Bryant	199	Oppose	Oppose.	<ul style="list-style-type: none"> <li>• Limits subjectively set, too low to be achievable, low compared to urban discharge standards.</li> </ul>
Fulton Hogan Limited	222	Amend	Include a permitted activity rule in relation to discharges of sediment not associated with a rain event.	<ul style="list-style-type: none"> <li>• How discharges of sediment from activities involving water that is not rain are addressed is not clear.</li> </ul>
Holcim (New Zealand) Limited	224	Amend	Include a permitted activity rule in relation to discharges of sediment not associated with a rain event.	<ul style="list-style-type: none"> <li>• How discharges of sediment from activities involving water that is not rain are addressed is not clear.</li> <li>• Proposed rules do not provide a clear indication or certainty about what is required for compliance.</li> </ul>
Rayonier New Zealand Ltd	256	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission. Insert a controlled activity standard for activities that are non-compliant with Rule 12.C.1.1.	<ul style="list-style-type: none"> <li>• Appears rules designed for intensification of pastoral farming.</li> <li>• Insufficient consideration given to impact on forestry.</li> <li>• Fails to provide default standard in event of non-compliance.</li> <li>• A default of controlled activity should be included.</li> <li>• Prohibition inappropriate default.</li> <li>• Activity non-compliant with rule but compliant with prohibition will be an "innominate activity".</li> <li>• Creates uncertainty.</li> <li>• If permitted under district plan then needs certainty for investors that it can be harvested.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Existing use of border dykes (where established prior to 31 march 2012) should have permitted status provided that it is not likely to result in significant adverse environmental effects.	<ul style="list-style-type: none"> <li>• The proposed permitted and prohibited activity approach is overly restrictive, contrary to good resource management practice and the purpose and principles of the RMA.</li> </ul>
Environmental Defence Society	267	Amend	To amend the permitted activity discharge limits to ensure that cumulatively they do not give rise to effects outlined in Section 70 of the RMA, and that they maintain or improve water quality.	<ul style="list-style-type: none"> <li>• Setting catchment load limits is only effective way to manage cumulative effects of multiple discharges.</li> <li>• Permitted activity limits should not exceed catchment limits.</li> <li>• Permitted activities cannot result in Section 70 effects.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Support submission 267 ref. 228</i>		<ul style="list-style-type: none"> <li>• <i>Cumulative effects need to be considered to give effect to the RMA and NPSFW.</i></li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Oppose in part submission 267 ref. 228</i>		<ul style="list-style-type: none"> <li>• <i>Supports the setting out of discharge limits based on robust information, to carry out the purpose of the RMA.</i></li> <li>• <i>But, expectation that every discharge of contaminants maintain water quality is flawed.</i></li> <li>• <i>Catchment's overall water quality should be maintained in accordance with the NPS.</i></li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose in part submission 267</i>		<ul style="list-style-type: none"> <li>• <i>Oppose suggestion all applications for resource consent should be publicly notified.</i></li> </ul>
<i>Mr NS Mackenzie</i>	1035			



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mr BJ Graham	1036	ref. 228		
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			
Mr DC Greer	1039			
Mr RG & Mrs SS Burdon	1040			
Mr TE & Mrs JA Craig	1041			
Mr DJ & Mrs JC Andrew	1042			
Macraes Community Incorporated	1043			
Mr GV & Mrs RE Gardner	1044			
Mr AWB Elliot	1045			
Mrs J Hodge	1046			
Mr RP & Mrs RR Van Vught	1047			
Mainland Poultry Limited	1048			
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Glenshee Station Limited	1062	Oppose submission 267 ref. 228		<ul style="list-style-type: none"> <li>• Oppose submission in that it supports plan change and use of prohibited activity status.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 267 ref. 228		<ul style="list-style-type: none"> <li>• Inconsistent with relief sought by further submitter.</li> </ul>
Dugald MacTavish	294	Amend	The setting of contaminant limits needs to consider the wider assimilation capacity of global level as well as local ecological and social values e.g. for N and P and perhaps certain chemicals.	<ul style="list-style-type: none"> <li>• Setting limits in broader context helps incorporate costing of activities.</li> <li>• Promotes sustainability of agricultural systems.</li> <li>• May raise questions how to best utilise/dispose additional quantities of nutrients.</li> </ul>
The Director-General of Conservation	306	Amend	<p>Add Schedule xx - Areas with Significant Aquatic Values [see original submission document].</p> <p>The Maps [attached to submission] titled "Coastal Otago", "Central Otago", "Wanaka" and "Wakatipu" and the areas identified as "Zone 1" and "Zone 2" on these Maps and as contained in the proposed Schedule be recognised and managed via the application of amendments sought in this submission to the provisions setting out how disturbance of river and lake and other water body beds will be managed.</p>	<ul style="list-style-type: none"> <li>• Including new Schedule of areas provides greater clarity.</li> <li>• Significant aquatic values can be adversely affected by the erection or placement of structures.</li> <li>• The most significant habitats of acutely threatened indigenous freshwater fish should be protected.</li> <li>• Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.</li> </ul>
ME Elston	1002	Oppose submission 306 ref. 228		<ul style="list-style-type: none"> <li>• Approach does not acknowledge local environmental conditions.</li> <li>• Extent of waterways is misrepresented in the maps.</li> <li>• Insufficient factual evidence and detail provided by submitter.</li> <li>• Should be justified by factual site investigation by suitably qualified ecologist.</li> <li>• Permission should be sought from landowners to undertake site investigations.</li> <li>• Landowners should be consulted with any new information and given suitable time to respond.</li> </ul>
Forest and Bird NZ	1007	Support submission 306		<ul style="list-style-type: none"> <li>• Addition of schedule for significant aquatic values is needed to meet RMA section 6 requirements.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 228</i>		
<i>DJ &amp; KR Scott</i>	<i>1008</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>• Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• No evidence from environmental impacts from agricultural activities.</li> <li>• Changes are vague, unclear and open-ended.</li> <li>• No need for further restrictions on discharges.</li> </ul>
<i>Auripo Enterprises Ltd</i>	<i>1017</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Not based on factual evidence.</li> <li>• Maps inaccurate</li> <li>• Liaison with adjoining landholder is more preferable approach than blanket protection.</li> </ul>
<i>Hopefield Investments Ltd</i>	<i>1019</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Would impact on farming operation.</li> <li>• Further submitter is currently undertaking significant measures to address any potential effects on water quality.</li> <li>• Costs of the proposed changes outweigh the benefits.</li> </ul>
<i>JH William &amp; KA McNally</i>	<i>1020</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Several areas within Zone 1 are incorrectly identified as waterways on land within the Ida Valley area.</li> <li>• Requested changes unduly restrictive on the right to live and work on affected land and contrary to the RMA.</li> </ul>
<i>RJ McNally</i>	<i>1021</i>			
<i>Kim &amp; Mary Heany</i>	<i>1024</i>			
<i>Dunedin City Council</i>	<i>1025</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Many small structures can be erected with minimal adverse environmental effect.</li> </ul>
<i>TJ &amp; NM Arthur</i>	<i>1026</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Hindrance to farming practices and threat to viability of farm.</li> <li>• Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>• Creeks are not in their original beds.</li> <li>• Inaccuracy of maps.</li> <li>• Stock lightly grazing the waterways protects fish habitat and water quality.</li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Too stringent.</li> </ul>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Inclusion of new schedule is not supported without a full S32 report.</li> </ul>
<i>Ida Valley Station / Ida Valley Irrigation Co</i>	<i>1033</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• The plan adequately manages the potential effects of activities such as the construction of structures and stock access to water, on waterbodies in the region.</li> <li>• Would have a huge impact on farming operation.</li> <li>• Further submitter is already taking significant measures to address potential effects on water quality of land-use activities.</li> <li>• Costs of proposed changes outweigh any potential benefits.</li> </ul>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> <li>• Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> </ul>
<i>Mr NS Mackenzie</i>	<i>1035</i>			
<i>Mr BJ Graham</i>	<i>1036</i>			
<i>Mr TR Michelle</i>	<i>1037</i>			
<i>Dunedin International Airport Limited</i>	<i>1038</i>			
<i>Mr DC Greer</i>	<i>1039</i>			
<i>Mr RG &amp; Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE &amp; Mrs JA Craig</i>	<i>1041</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested	
Mr DJ & Mrs JC Andrew	1042			<ul style="list-style-type: none"> <li>• Nothing to be gained from high and costly level of consenting requirements if ORC cannot monitor and enforce.</li> <li>• Proposed changes would require an enormous number of staff to monitor.</li> </ul>	
Macraes Community Incorporated	1043				
Mr GV & Mrs RE Gardner	1044				
Mr AWB Elliot	1045				
Mrs J Hodge	1046				
Mr RP & Mrs RR Van Vught	1047				
Mainland Poultry Limited	1048				
Calder Stewart Industries Limited	1049				
Clutha District Council	1050				
Central Otago District Council	1051				
Moutere Station Limited	1052	Oppose submission 306 ref. 228		<ul style="list-style-type: none"> <li>• Very wide changes sought without evidence of environmental impact, including land management practice.</li> <li>• Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement.</li> <li>• Inappropriate and costly to require consents for structures over rivers, lakes &amp; RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified.</li> <li>• Seasonal muster restrictions inappropriate, permit at least 12 crossings per year.</li> <li>• Shouldn't restrict necessary farming discharges.</li> <li>• No gain from high &amp; costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</li> </ul>	
Hawkdun Station	1053				
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 228			<ul style="list-style-type: none"> <li>• Proposed changes wide and not supported by evidence of environmental impacts.</li> <li>• Inappropriate to ask changes to land management practices in the absence of clear baseline of environmental impact from existing land management practices.</li> <li>• Sought changes vague, unclear and open-ended.</li> <li>• Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.</li> <li>• Nothing to be gained from high and costly level of consenting requirements if ORC cannot monitor and enforce.</li> <li>• Proposed changes would require an enormous number of staff to monitor.</li> </ul>
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 228			<ul style="list-style-type: none"> <li>• Inconsistency with RMA Part II.</li> <li>• Extends beyond scope of plan change.</li> <li>• Will impact farming given lack of environmental issues.</li> </ul>
TrustPower	1059	Oppose submission 306 ref. 228			<ul style="list-style-type: none"> <li>• Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values.</li> <li>• Should be accompanied by a robust section 32 analysis and supporting material.</li> <li>• Should be initiated by the Council.</li> </ul>
Glenshee Station Limited	1062	Oppose submission 306 ref. 228			<ul style="list-style-type: none"> <li>• Opposes the support in DoC's submission for reasons in Glenshee's original submission.</li> <li>• Opposes that the Kyeburn catchment, which contains Glenshee station, should be identified as an Area of Significant Aquatic Habitat.</li> </ul>
The NZ Transport Agency	1073	Oppose submission 306 ref. 228			<ul style="list-style-type: none"> <li>• Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</li> <li>• Seeks that the submission be disallowed.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• <i>Overly restrictive and disproportionate.</i></li> <li>• <i>Does not take into account economic considerations.</i></li> </ul>
<i>Blackstone Hill Ltd</i>	1075	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• <i>The DoC proposal is in conflict with previous agreements made by the department with the landowner.</i></li> <li>• <i>The proposal diminishes the parcel of rights that are within Freehold Title.</i></li> </ul>
<i>Snowline Ltd</i>	1076	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• <i>Protection for vulnerable indigenous flora, fauna and their habitat is already provided for.</i></li> <li>• <i>Suggested changes is superfluous and overly onerous.</i></li> </ul>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 228</i>		<ul style="list-style-type: none"> <li>• <i>Methodology used to identify areas of significant aquatic values not stated, no indication of how significance measured or why entire networks of waterways included. Concessions in DoC's submission make imposition of more restrictive rules inappropriate.</i></li> <li>• <i>Rules fail relevant tests under section 32 RMA.</i></li> <li>• <i>Additional controls not justified in terms of effects.</i></li> <li>• <i>Seek the submission be disallowed.</i></li> </ul>

### 236 Transition times

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Craig Werner	48	Amend	Rather than plan change 6A's timetable, a compliance timetable much more rigorous than the 2020 target would assist in this regard.	<ul style="list-style-type: none"> <li>• Year 2020 compliant target far too distant.</li> <li>• Waterways vulnerable to extreme drought.</li> <li>• Unprecedented weather patterns are a global reality.</li> <li>• Damage done by low flow/high pollutant concentrations to aquatic species, other flora and fauna</li> <li>• Ensure ratepayers not exposed to negative economic impact of restoration required by extreme climate events.</li> </ul>
Jeff & Alison Thompson	78	Oppose	More time needed for farmers to a) fully understand new rules; b) collect data of current water levels.	<ul style="list-style-type: none"> <li>• Timeframe for implementation of new rules too short.</li> <li>• Need more time to fully understand implications e.g. need time to collect data before and after wintering of cows in order to make changes / have information to make a submission suggesting suitable levels.</li> <li>• At least 12 months of data would give a realistic and accurate picture of what current water quality levels are at present.</li> </ul>
Ian Bryant	199	Oppose	Plan 6A should be delayed till these measuring tools [as quoted in ORC Rural Water Quality Strategy] are readily available.	<ul style="list-style-type: none"> <li>• Tools to allow farmers to take "frequent, inexpensive, and practical measurement of contaminant levels in discharges" unavailable.</li> <li>• These tools are essential in managing any discharge.</li> </ul>
Irrigation New Zealand Incorporated	202	Amend	An economic analysis is required to robustly define transition times.	<ul style="list-style-type: none"> <li>• Current transition times are arbitrary.</li> <li>• Transition times must reflect investment required.</li> <li>• Blanket 'one size fits all' not sound approach.</li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 202 ref. 236</i>		<ul style="list-style-type: none"> <li>• <i>Transition times will be difficult to achieve, particularly with unrealistic limits.</i></li> </ul>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 236</i>		<ul style="list-style-type: none"> <li>• <i>Although it doesn't request total plan change withdrawal it recognises the vague nature of controls proposed as inappropriate, particularly use of prohibited activity status.</i></li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Any timeframe for implementation should pay due regard to valuable property rights secured to land managers under existing resource consents. A collaborative approach which recognises the role of land managers and farm owners in implementing water quality measures is appropriate.	<ul style="list-style-type: none"> <li>• NPSFW enables policy implementation "as promptly as is reasonable in the circumstances" and requires "progressive implementation".</li> <li>• Reasonable timeframes involves consideration of land management practices, avoiding disproportionate costs, and ensuring sufficient time to change practices.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Philip, Heather & Geoff Wilson	304	Amend	Please give us more time. We need a fair and balanced approach. This should be considered on a case-by-case basis.	<ul style="list-style-type: none"> <li>• Cost of change not able to be financed in the timeframes given.</li> <li>• Already spending over \$50,000/yr on crossings, fencing, water supply systems etc but still have approximately \$500,000 more to spend to comply with current requirements.</li> <li>• <b>Not acceptable to put us out of business with the plan change.</b></li> </ul>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 304 ref. 236</i>		<ul style="list-style-type: none"> <li>• <i>Extensions to transition times will ensure plan is more achievable.</i></li> </ul>

### 237 Dams for collection and treatment

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Jeff & Alison Thompson	78	Not Applicable	Would like capture dams to be permitted to mitigate the effects of runoff - particularly in undulating farm land.	<ul style="list-style-type: none"> <li>• Try hard to limit runoff but hard to do this on North Otago land forms.</li> <li>• Permitting small capture dams would capture and reuse irrigation water thus stopping nuisance to neighbours, make the most of the resource and capturing potential contaminants before they enter a waterway.</li> </ul>
<i>North Otago Irrigation Company</i>	1061	<i>Support submission 78 ref. 237</i>		<ul style="list-style-type: none"> <li>• <i>ORC must give farmers the tools to mitigate/control contaminants. Ability to install small capture dams is a key mechanism to prevent transfer of nutrients. Requests ORC review position on capture dams.</i></li> <li>• <i>To support farmers meeting the rules and increasing water use efficiency.</i></li> </ul>
Windsor Park Dairies Ltd	185	Not Applicable	Review legislation regarding capture dams and recycling of the water stored in the capture dams.	<ul style="list-style-type: none"> <li>• Multiple low risk potential contamination has the effect of high risk.</li> <li>• Solutions include multiple sediment traps, track margins, cut offs, but pose ongoing issues.</li> <li>• Irrigated rolling country with high water holding capacity results in many springs and small waterways.</li> <li>• A better solution in some situations is a capture dam, to prevent contaminants entering larger waterways.</li> <li>• On farm innovation.</li> <li>• <b>Water from the capture dam should be able to be used on farm.</b></li> </ul>
<i>North Otago Irrigation Company</i>	1061	<i>Support submission 185 ref. 237</i>		<ul style="list-style-type: none"> <li>• <i>ORC must give farmers the tools to mitigate/control contaminants. Ability to install small capture dams is a key mechanism to prevent transfer of nutrients. Requests ORC review position on capture dams.</i></li> <li>• <i>To support farmers meeting the rules and increasing water use efficiency.</i></li> </ul>
Bob Kingan	190	Not Applicable	Utilising small dams to stop discharge to waterways, to allow settling and sunlight to improve quality and return collected water to be irrigated to farmland.	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>North Otago Irrigation Company</i>	1061	<i>Support submission 190 ref. 237</i>		<ul style="list-style-type: none"> <li>• <i>ORC must give farmers the tools to mitigate/control contaminants. Ability to install small capture dams is a key mechanism to prevent transfer of nutrients. Requests ORC review position on capture dams.</i></li> <li>• <i>To support farmers meeting the rules and increasing water use efficiency.</i></li> </ul>
Grant Ludemann	191	Not Applicable	Capture dams should be a permitted activity in gullies.	<ul style="list-style-type: none"> <li>• Will help cope with nutrient levels, and will allow nutrients to be reapplied through irrigation.</li> </ul>
<i>North Otago Irrigation Company</i>	1061	<i>Support submission 191 ref. 237</i>		<ul style="list-style-type: none"> <li>• <i>ORC must give farmers the tools to mitigate/control contaminants. Ability to install small capture dams is a key mechanism to prevent transfer of nutrients. Requests ORC review position on capture dams.</i></li> <li>• <i>To support farmers meeting the rules and increasing water use efficiency.</i></li> </ul>
North Otago Irrigation Company	260	Not Applicable	That ORC review its position on capture dams during this plan change process, so that where appropriate, farmers are able to manage their run-off in this way	<ul style="list-style-type: none"> <li>• Collection and re-use of irrigation run off through capture dams key mechanism to prevent transfer of nutrients.</li> <li>• Regulatory regime prevents this in the Waiareka catchment.</li> <li>• <b>Without capture dams irrigation run off can cross to dryland neighbouring</b></li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				properties - will create tension as neighbours will need to take measures to ensure contaminant levels are not increased.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 260 ref. 237</i>		<ul style="list-style-type: none"> <li>• Sustainable way to manage run-off, contaminant discharges and increase water use efficiency.</li> <li>• Rules that provide for this should be encouraged</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 237</i>		<ul style="list-style-type: none"> <li>• Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 237</i>		<ul style="list-style-type: none"> <li>• Support the NOIC submission in full.</li> </ul>

### 239 Consented contaminant discharges - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
NZ Transport Agency	203	Amend	Add a catchall discretionary rule to allow discharges to water to obtain consent.	<ul style="list-style-type: none"> <li>• There is no discretionary activity for discharges to water.</li> <li>• Compliance with Schedule 16 unachievable.</li> <li>• Concerned about possible future extension of this approach to stormwater discharges.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 239</i>		<ul style="list-style-type: none"> <li>• No reasons given.</li> </ul>
Dunedin City Council	211	Amend	Add a "catch all" discretionary rule to Section 12.C to allow discharges to water to obtain consent.	<ul style="list-style-type: none"> <li>• Current information from ORC shows Schedule 16 not achievable, so all discharges become prohibited.</li> <li>• Oppose as will have significant social, economic and cultural effects.</li> <li>• Allowing discretionary activity rule will still allow objectives and policies to be met.</li> </ul>
<i>Contact Energy Limited</i>	1013	<i>Support submission 211 ref. 239</i>		<ul style="list-style-type: none"> <li>• Reasons stated in the submission.</li> </ul>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 211 ref. 239</i>		<ul style="list-style-type: none"> <li>• Existing rule framework overly restrictive.</li> <li>• Provisions for discretionary activities should be included for discharges to water.</li> <li>• Supports rules consistent with the relevant objectives and policies in the plan.</li> </ul>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 239</i>		<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 211 ref. 239</i>		<ul style="list-style-type: none"> <li>• Allows for plan objectives to be met, while recognising potential negative impacts of the discharge rules on other areas of well-being (beyond environmental).</li> <li>• Allow some activities to take place, where appropriate.</li> </ul>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 239</i>		<ul style="list-style-type: none"> <li>• Agree with submissions in relation to discharge rules and prohibited discharges.</li> <li>• Schedule 16 requires review.</li> <li>• Section 32 analysis was inadequate.</li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 239</i>		<ul style="list-style-type: none"> <li>• Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>• Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> <li>• Activities should only be classified as 'prohibited' where they are likely to</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>result in significant adverse effects.</i>
Fonterra Co-operative Group Limited	241	Amend	Include a rule for proposed or existing activities that would otherwise default under S 87B of the RMA to be discretionary activities, with some specific guidance on what applicants need to do to obtain a resource consent.	<ul style="list-style-type: none"> <li>No guidance for resource consent applications.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 239</i>		<ul style="list-style-type: none"> <li>Consistent with relief sought by further submitter.</li> </ul>
North Otago Irrigation Company	260	Amend	That it is recognised within the plan that existing discharge consents will not be reviewed to the proposed discharge limits.	<ul style="list-style-type: none"> <li>Hold a number of existing consents for discharge of pipeline scour water.</li> </ul>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 239</i>		<ul style="list-style-type: none"> <li>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 239</i>		<ul style="list-style-type: none"> <li>Support the NOIC submission in full.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Insert new rule: 12.C.3 Discretionary activity: resource consent required and provide for any discharge of contaminants from an animal waste system to saturated land or that results in ponding as a discretionary activity.	<ul style="list-style-type: none"> <li>The proposed permitted and prohibited activity approach is overly restrictive, contrary to good resource management practice and the purpose and principles of the RMA.</li> </ul>
Fish and Game (Central South Island)	273	Amend	Amend rules 12.1 and 12.2 to include the effects of the use of water in the matters to which discretion is restricted.	<ul style="list-style-type: none"> <li>Without rules for controlling land use intensification, specifically irrigation, the desired Schedule 15 standards may not be met or maintained.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 239</i>		<ul style="list-style-type: none"> <li>Not all waterways should have a high standard of water quality.</li> <li>Affected by a variety of activities, not just agricultural uses.</li> <li>Imposes unnecessary constraints on farming practices.</li> </ul>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 273 ref. 239</i>		<ul style="list-style-type: none"> <li>A land-use activity approach is more workable.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 273 ref. 239</i>		<ul style="list-style-type: none"> <li>The water quality matters are appropriately contained within the Rules addressed by the Proposed Plan Change.</li> </ul>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 273 ref. 239</i>		<ul style="list-style-type: none"> <li>If point of the plan change is to address these concerns via schedule values rather than imposition of further controls via consideration of the use water would be put to.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 239</i>		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Contact Energy Limited	284	Amend	Add a new discretionary rule as follows: "Notwithstanding Rules 12.C.0.1, 12.C.0.2, 12.C.0.3 and 12.C.0.4., the discharge of water or contaminants from a lawfully established dam is a discretionary activity, providing the principal purpose of the dam is not to enable storage of contaminants."	<ul style="list-style-type: none"> <li>Absence of reasons for rules suggests insufficient consideration was given to the situations that may or may not apply in a prohibited activity.</li> <li>Uncertain if it accounts for situation of water taken then discharged.</li> </ul>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 284 ref. 239</i>		<ul style="list-style-type: none"> <li>Such discharges would be discretionary if they did not meet prohibited status.</li> <li>If they do not meet the standards to ensure good quality water, then they should remain prohibited.</li> </ul>
Oceana Gold (New Zealand) Limited	285	Not Applicable	That specific exemptions be made for existing discharges, such as those from the Macraes Gold Project;  That protection and appropriate weight are given to existing operations such as the Macraes Gold Project, that represent	<ul style="list-style-type: none"> <li>OceanaGold recently obtained consents from ORC for discharges associated with expanded mine.</li> <li>Compliance limits apply after reasonable mixing.</li> <li>OceanaGold objects to any plan change that may risk the operations of Macraes Gold Project.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			significant investment and that provide significant economic and social benefit to the region.	

#### 240 Water discharges - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
E D Paton	92	Amend	Reduce allowable water to run onto other properties. No irrigating with centre-pivots near streams.	<ul style="list-style-type: none"> <li>Independent inspections for pipeline leaks.</li> <li>Reduce irrigation when soil is wet.</li> <li>Low land owners should not be responsible for problems caused by other irrigators.</li> <li>All water used for irrigation to be measured daily (i.e. soil moisture).</li> </ul>
<i>Isa Holdings Ltd</i>	<i>1058</i>	<i>Oppose submission 92 ref. 240</i>		<i>Prohibiting centre-pivots near streams unnecessary.</i>
Blakely Pacific Limited	209	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> <li>Insufficient consideration given to the impacts on forestry sector.</li> <li>Fails to provide a default standard in event of non-compliance.</li> <li>Need to provide clarity and certainty.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 209 ref. 240</i>		<i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i>
Ken Telford	272	Amend	Need to remove the word "drainage" in relation to non-point source pollutants.	<ul style="list-style-type: none"> <li>South Otago relies on ditching, tiling, and mole ploughing.</li> <li>Drainage should be considered when effluent or contaminant is introduced.</li> <li>Drainage cannot be lumped in with run-off and leach ate as source of non-point source pollution.</li> </ul>

#### 243 Chapter 13 - general requests

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mitchell & Webster Ltd	186	Support	Supports the implementation of this rule.	<ul style="list-style-type: none"> <li>Saves consents, bureaucracy and time, lets land owners get on with activities.</li> </ul>
Dunedin City Council	211	Amend	That each of the rules in these sections be revised to clarify the status of activities, rather than relying on the introductory notes.	<ul style="list-style-type: none"> <li>Introductory notes do not have legal weight.</li> <li>Rules do not reflect interpretation contained in introductory notes and will result in ambiguity and confusion.</li> </ul>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 211 ref. 243</i>		<i>No reason given.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 211 ref. 243</i>		<ul style="list-style-type: none"> <li>Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> </ul>
Fulton Hogan Limited	222	Amend	Amend.	<ul style="list-style-type: none"> <li>Proposed rules do not provide certainty and is difficult to determine status of activities.</li> <li>Reduces certainty about environmental outcomes that can be expected.</li> </ul>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 222 ref. 243</i>		<i>Need certainty on status of rules.</i>
Holcim (New Zealand) Limited	224	Amend	Amend.	<ul style="list-style-type: none"> <li>Proposed rules do not provide certainty</li> <li>It's difficult to determine status of activities.</li> <li>Reduces certainty about the environmental outcomes that can be expected.</li> </ul>
<i>Federated Farmers of New</i>	<i>1057</i>	<i>Support</i>		<i>Need certainty on status of rules.</i>



Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 224 ref. 243</i>		
Waitaki Irrigators Collective Limited	257	Support	Supportive of the changes that the Council have suggested in order to make the erection of bridges simpler and less costly for land holders.	• No reason given.
Federated Farmers of New Zealand	278	Amend	Amend Rule 13.1.2 to ensure appropriate inclusion Regionally Significant Wetlands: "13.1.2.1 ...the use of a structure that is fixed in, on, under or over the bed of any lake or river, or Regionally Significant Wetland, is a restricted discretionary activity."	• Inclusion of RSWs within the plan change means it is appropriate for these to be included within circumstances falling outside Rule 13.1.1.1 criteria.
<i>Albert McTainsh</i>	<i>1004</i>	<i>Support submission 278 ref. 243</i>		• <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	<i>1019</i>	<i>Support submission 278 ref. 243</i>		• <i>Operation relies on natural streams for continuing viability.</i> • <i>Plan change has huge impact on farming business.</i> • <i>Plan change does not differentiate between intensive farming and extensive pastoral grazing.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 278 ref. 243</i>		• <i>No reason given.</i>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 278 ref. 243</i>		• <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i> • <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i>
Fish and Game (Otago)	287	Amend	Retain these provisions [land use in relation to beds of wetlands].  Include the schedule identifying areas of significant spawning habitat  Add rules requiring resource consents as follows: (a) Zone 1: The grazing of the bed of a waterway in the waterways in the schedule will require a consent, presumably as a restricted discretionary activity with the discretion restricted to the issue of fish spawning. The notification level should be limited notification. (b) Zone 2: The erection of any structure in the scheduled waterway will require activity with the discretion restricted to the issue of fish spawning. The notification level should be limited notification.  Or in the alternative, insert a new rule requiring that resource consents be required for grazing and the erection of structures in waterways that have significant spawning habitat.	• Stricter rules applied to land use in relation to beds of wetlands are supported. • Information will be supplied to ORC on spawning habitat. • Shapefiles supplied separately for mapping form part of this submission.
<i>DJ &amp; KR Scott</i>	<i>1008</i>	<i>Oppose submission 287 ref. 243</i>		• <i>Hindrance to farming practice / livelihood: contrary to right to undertake normal, lawful activities on one's land; adverse economic impact due to cost of consenting process for both farmers and the ORC; risk of devaluation of farm.</i> • <i>Maintenance of waterways and farm access: risk of blocked culverts, flooded access routes and roads; flooding of farmland has negative economic impact on farm.</i> • <i>Creeks are not in their original bed: they have been altered to supply stock with water in drought time; in eight out of the last eleven years, the creeks have dried up.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Maps provided by DOC inaccurate.</li> <li>• No factual evidence that quoted fish species exist in the area.</li> </ul>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 243</i>		<ul style="list-style-type: none"> <li>• Not all waterways should have a high standard of water quality.</li> <li>• Affected by a variety of activities, not just agricultural uses.</li> <li>• Imposes unnecessary constraints on farming practices.</li> </ul>
<i>Auripo Enterprises Ltd</i>	1017	<i>Oppose submission 287 ref. 243</i>		<ul style="list-style-type: none"> <li>• Not based on factual evidence.</li> <li>• Maps inaccurate.</li> <li>• Liaison with adjoining landholder is more preferable approach than blanket protection.</li> <li>• Excluding livestock, sheep and beef is not practical.</li> </ul>
<i>JH William &amp; KA McNally</i>	1020	<i>Oppose submission 287 ref. 243</i>		<ul style="list-style-type: none"> <li>• Hindrance to farming practice / livelihood: contrary to right to undertake normal, lawful activities on one's land; adverse economic impact due to cost of consenting process for both farmers and the ORC; risk of devaluation of farm.</li> <li>• Maintenance of waterways and farm access: risk of blocked culverts, flooded access routes and roads; flooding of farmland has negative economic impact on farm.</li> <li>• Creeks are not in their original bed: they have been altered to supply stock with water in drought time; in eight out of the last eleven years, the creeks have dried up.</li> <li>• Maps provided by DOC inaccurate.</li> <li>• No factual evidence that quoted fish species exist in the area.</li> </ul>
<i>RJ McNally</i>	1021			
<i>Kim &amp; Mary Heany</i>	1024	<i>Oppose submission 287 ref. 243</i>		<ul style="list-style-type: none"> <li>• Hindrance to farming practice / livelihood: contrary to right to undertake normal, lawful activities on one's land; adverse economic impact due to cost of consenting process.</li> <li>• Maintenance of waterways and farm access: implications for farm access, stormwater control and management; cost for landowners and Council.</li> <li>• In eight out of the last eleven years, the creeks have dried up.</li> <li>• No factual evidence that quoted fish species exist in the area.</li> </ul>
<i>TJ &amp; NM Arthur</i>	1026	<i>Oppose submission 287 ref. 243</i>		<ul style="list-style-type: none"> <li>• Hindrance to farming practices and threat to viability of farm.</li> <li>• Implications for maintenance of waterways and farm access, potential damage to farmland and public roads.</li> <li>• Creeks are not in their original beds.</li> <li>• Inaccuracy of maps.</li> <li>• Stock lightly grazing the waterways protects fish habitat and water quality.</li> </ul>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 243</i>		<ul style="list-style-type: none"> <li>• Unnecessary constraints on farming practices.</li> <li>• Impractical and costly.</li> <li>• Does not enable agricultural land to be fully utilised.</li> </ul>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 287 ref. 243</i>		• <i>Additional zones not shown to be ... [further submission incomplete].</i>
<i>The NZ Transport Agency</i>	1073	<i>Oppose submission 287 ref. 243</i>		• <i>Many small structures can be erected with minimal adverse environmental effects and should not need resource consent.</i> • <i>Seeks that the submission be disallowed.</i>

#### 244 Other approaches

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Marianne Shennan	11	Not Applicable	Agri-industry should dispose of their own waste or find way to recycle it (i.e. dung as fuel).	• Water is of inestimable value.
Mrs I Green	14	Not Applicable	Tighter control should be made on farmers' allocated water to stick to that allocation.	• Actual water use greater than allocated water use, causes loss of water quality.
Mrs Marie C McDonald	15	Not Applicable	Government help farmers financially to encourage them to fence off along the edges of rivers and streams.	• Cows cause pollution and trample fish eggs.
David John Mackie	33	Not Applicable	Believe farmers should be given more time to enlarge their effluent ponds.	• Consents given by ORC in first place. • Larger ponds needed to hold effluent until conditions are right. • Too quick to take farmers to court - farmers and ORC in this together.
Hewett Farm Ltd	39	Not Applicable	Thought needs to be given to some form of N tradeable certificates for those who wish to apply more N than the guidelines allow, similar to the approach around Lake Taupo.	• Tactical N applications over the year.
Marianne & Michael Parks	51	Not Applicable	Key development we would like to see implemented that would have a key influence on meeting the targets set in this rule [12.C.2.1] include a sustainable farming fund managed by the Regional Council where land users can obtain funding from Council to fence off waterways and riparian planting that create corridors of native plants along the banks of waterways to support habitats for native birds and fish as well as preventing silting by mitigating erosion. What we envisage is something similar to the QE2 Trust that works in partnership with land users to support water quality improvements through fencing of waterways and riparian planting.	• Not acceptable only land users on waterways targeted (catchment far greater). • Don't support focus on dairy (all land users polluters e.g. deer) • Some emphasis in plan on how ORC will co-ordinate with farmers on waterways re fencing and riparian planting • Funding should be part of solution.
University of Otago, Department of Zoology	57	Not Applicable	Encourage "best management practice" for agriculture to help ensure that waterway health can be as good as realistically possible in farmed areas.	• Encourage fencing, riparian planting, and preventing livestock damage to waterways. • Mentioning issues in Table 15.1 (vegetation is not stripped bare) not sufficient.
Green Party (Dunedin Branch)	62	Not Applicable	A further consideration is the relation between river flows and contaminated runoff. Can find nowhere in the plan where this issue is addressed.	• Water quality threatened by increase in irrigation. • River at winter levels can assimilate contaminants. • Water taken at low flows affects rivers' ability to assimilate.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 244</i>		• <i>No reason stated.</i>
<i>Mr RJ Borst</i>	1034			
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	1036			
<i>Mr TR Michelle</i>	1037			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG &amp; Mrs SS Burdon</i>	1040			
<i>Mr TE &amp; Mrs JA Craig</i>	1041			
<i>Mr DJ &amp; Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV &amp; Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP &amp; Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049			
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 244</i>		<ul style="list-style-type: none"> <li>• Does not allow flexibility for existing farming operations to give effect to the NPS.</li> <li>• Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime.</li> <li>• Does take into account local environmental conditions and economic/development consideration.</li> <li>• Disproportionate and overly restrictive.</li> </ul>
Cross Family Trusts	77	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>• If significant financial assistance is not provided, proposed measures will devalue Council's primary sector rating base value and inhibit development and enhancement of the region's resources.</li> </ul>
E D Paton	92	Not Applicable	To inspect stream for rubbish laying beside stream, i.e., old heaps of willows.  All problems caused by irrigation should be addressed and paid for by those causing the problems and not the low land owners.	<ul style="list-style-type: none"> <li>• Have had electric fences wiped out by such rubbish.</li> </ul>
Jane Young	124	Not Applicable	Monitoring can only be done if there is sufficient financial support available both for ORC staff and individual farmers.	<ul style="list-style-type: none"> <li>• Success depends on frequent expensive monitoring of discharges, doesn't appear to be provided for.</li> </ul>
Hawea Community Association	126	Not Applicable	If we are committed to protecting our water then we must have constructive communication and cooperation between all parties.	<ul style="list-style-type: none"> <li>• ORC and QLDC need to work together to ensure the aim of good water quality is met.</li> <li>• QLDC needs to recognise water quality and quantity in district planning and consenting.</li> </ul>
Belmont	129	Not Applicable	Enforce lower water rates on steep hill country and steep land and should have to obtain consent for irrigation.	<ul style="list-style-type: none"> <li>• Support clean water but can't accept benefit a person derives while causing cost to another.</li> </ul>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 129 ref. 244</i>		<ul style="list-style-type: none"> <li>• Unnecessarily restrictive.</li> <li>• Proposed plan change adequately addresses adverse effects.</li> </ul>
Clyde Dairy Farm Ltd	196	Not Applicable	The Council should continue to help educate and promote good farming practices. 'Not' to try regulate farmers and others out of business.	<ul style="list-style-type: none"> <li>• Potential nutrient run off during an extreme rain event could be good for oceans.</li> <li>• Landowners should apply some mitigation to heavily reduce or stop silt loss, but Council zero tolerance is unreasonable.</li> </ul>
Medical Students For Global Awareness	227	Not Applicable	That ORC along with the proposed changes provide financial support to those required to make changes.	<ul style="list-style-type: none"> <li>• ORC, in consultation with public, corporate sponsorship and central government, should help reduce financial burden on farmers for cleaning up</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				our waterways. <ul style="list-style-type: none"> <li>Cleaning up waterways is a public issue stemming from practices we as a nation use to support our economy,</li> <li>It is unfair to make it all the farmers' responsibility when it is everyone's responsibility.</li> </ul>
Otago Rock Lobster Industry Organisation	243	Not Applicable	Include in the plan change a realistic process by which the parties impacted on by the change can establish recognised Development and Management Programmes in order to progress toward compliance with the National Fresh Water Standards.  Establishment of an agriculture and forestry based group to oversee the initiation of programmes.  A rate be levied on those parties that don't participate in management plan and compliance initiatives, to cover the cost of monitoring their discharges and compliance with fresh water standards.	<ul style="list-style-type: none"> <li>There needs to be time to change practices and implement change.</li> <li>Degrading of freshwater has had significant impact on coastal marine environments i.e. Kelp forests on the Otago coast.</li> <li>Degradation has impacted on commercial marine operations i.e. Otago Lobster Industry.</li> <li>Changing rules won't change behaviour. Time to set out prescriptive requirements and start managing catchments.</li> </ul>
North Otago Irrigation Company	260	Not Applicable	Streamline the current consenting process required to undertake works to construct wetlands for the purposes of improving water quality.  That ORC provide some form of subsidy of financial support to assist farmers undertaking projects to enhance water quality, including riparian fencing and planting. These subsidies could include an incentive to move quickly, e.g. a five year time limit.	<ul style="list-style-type: none"> <li>Many farmers would be interested in constructing wetlands - long costly consent process puts them off.</li> <li>Significant work needed by farmers to meet water quality objectives.</li> <li>Other regional councils provide subsidies with good outcomes.</li> </ul>
<i>Waitaki Irrigators Collective Limited</i>	<i>1031</i>	<i>Support submission 260 ref. 244</i>		<ul style="list-style-type: none"> <li>Allows innovative mitigation options to be undertaken.</li> <li>Supports a truly effects-based approach.</li> </ul>
<i>John Webster</i>	<i>1063</i>	<i>Support submission 260 ref. 244</i>		<ul style="list-style-type: none"> <li>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</li> </ul>
<i>Peter Mitchell</i>	<i>1064</i>	<i>Support submission 260 ref. 244</i>		<ul style="list-style-type: none"> <li>Support the NOIC submission in full.</li> </ul>
Dugald MacTavish	294	Not Applicable	Don't consider that the ORC should ignore examination of catchment-based load limits as they will help identify sustainable landuse configurations at a catchment level before the horse has bolted.	<ul style="list-style-type: none"> <li>Role for ORC to promote landuse diversification.</li> <li>Could be included under "methods other than rules".</li> </ul>
Philip, Heather & Geoff Wilson	304	Not Applicable	If ORC wants better quality water, provide us with a decent service for the rates we pay.	<ul style="list-style-type: none"> <li>Due to poor maintenance of West Taieri drains, water can pond for 30 days after heavy rain, making farming difficult.</li> </ul>
Lake Edge Farms Ltd	333	Not Applicable	Incentives for planting and fencing.	<ul style="list-style-type: none"> <li>Water in Otago is getting worse and something needs to be done.</li> <li>Incentive may help achieve change.</li> </ul>

#### 245 Future plan changes

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Jeff & Alison Thompson	78	Not Applicable	Urban areas should also be held to the same standards for runoff / water contamination.	<ul style="list-style-type: none"> <li>No reason given.</li> </ul>
Alan L Wilson	88	Not Applicable	If we [farmers] have to reach a certain standard regardless of cost then streams such as the Leith and Kaikorai should have to reach	<ul style="list-style-type: none"> <li>Objects to singling out farmers for water quality control.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Queenstown Lakes District Council	255	Not Applicable	the same standard. Amend Plan Change 6A and its associated plans to clarify that the proposed provisions and standards do not apply to the urban parts of the district.	<ul style="list-style-type: none"> <li>Inappropriate to adopt approach to wastewater/stormwater for urban areas.</li> </ul>
<i>Dunedin City Council</i>	1025	<i>Support submission 255 ref. 245</i>		<ul style="list-style-type: none"> <li>No reasons given.</li> </ul>
<i>Clutha District Council</i>	1050	<i>Support in part submission 255 ref. 245</i>		<ul style="list-style-type: none"> <li>Further clarity is needed.</li> </ul>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>The NZ Transport Agency</i>	1073	<i>Support submission 255 ref. 245</i>		<ul style="list-style-type: none"> <li>Recognition Schedules 15 and 16 don't accurately reflects variations between water bodies.</li> <li>Agreed that allowance for appropriate mixing zones should be included.</li> <li>Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects.</li> <li>Seeks the submission be allowed and the plan change be amended as per the submission.</li> </ul>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 255 ref. 245</i>		<ul style="list-style-type: none"> <li>Activities should only be prohibited where they are likely to result in significant adverse effects.</li> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Horticulture New Zealand	269	Not Applicable	If the approach in Plan Change 6A is to be retained include a requirement for urban discharges and septic discharges to meet limits in Schedule 16.	<ul style="list-style-type: none"> <li>Inequitable approach to discharges.</li> <li>Horizons one plan showed urban and road network based sources were significant contributors to degradation.</li> <li>To not address urban discharges places unfair burden on rural land use activities.</li> </ul>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 245</i>		<ul style="list-style-type: none"> <li>Measurement process to establish N level/ha unworkable.</li> <li>Landuse management not the ORC's role.</li> <li>Cost to implement the plan change will be huge.</li> <li>If there is valid need to restrict N usage in specific areas this should be developed in consultation with land users and sectors, not by imposition.</li> </ul>
Annie Stuart	280	Not Applicable	Would like to have specific reference to the scope of contamination extended beyond agricultural, stormwater and sewage, which seem to be the main through of these changes, to include mining activities.	<ul style="list-style-type: none"> <li>Plan change does not reflect pressure on Otago's water with currently proposed mining.</li> </ul>
Oceana Gold (New Zealand) Limited	285	Not Applicable	That any policy changes in respect of discharge of contaminants related to farming activities not be applied on a blanket basis throughout the Water Plan in subsequent plan changes;	<ul style="list-style-type: none"> <li>Concerned the plan change may be applied in later changes to stormwater/industrial and trade premises discharges.</li> <li>OceanaGold objects to any plan change that may risk the operations of the Macraes Gold Project.</li> </ul>

#### 248 Supports another submission

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Mosgiel Taieri Community Board	46	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>Supports and endorses the DCC's submission [submitter number 211].</li> </ul>
Ray Fox	89	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>Support submissions made on my behalf by Lower Waitaki Irrigation Co and Federated Farmers [submitter numbers 106 and 278].</li> </ul>
S A Hayes	118	Not Applicable	ORC should be guided by the Lower Waitaki Irrigation submission [submitter number 106] on proposed plan change 6A.	<ul style="list-style-type: none"> <li>Represent families and farms most affected.</li> <li>They have researched, have local knowledge, taken expert advice, and are a very successful company.</li> </ul>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Contact Energy Limited	1013	Oppose submission 118 ref. 248		<ul style="list-style-type: none"> <li>The reasons prompting special recognition of significant wetlands in the Otago region do not apply to all other freshwater bodies throughout the region.</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 118 ref. 248		<ul style="list-style-type: none"> <li>Overly restrictive and disproportionate.</li> <li>Does not take into account economic considerations.</li> </ul>
Strathburn Limited	130	Support	No decision requested.	<ul style="list-style-type: none"> <li>Supports submission by Federated Farmers and has not repeated it here for brevity [submitter number 278].</li> </ul>
Clutha Agricultural Development Board	139	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>Have discussed plan change and issues with CDC.</li> <li>Support CDC's submission points [submitter number 308].</li> </ul>
Korteweg Family Trust	142	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>Fully support Federated Farmers submission.</li> <li>Is a member and had input into the submission.</li> </ul>
Strath Taieri Community Board	164	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>Has seen some parts of the Federated Farmers and DCC submissions and support them [submitter numbers 278 and 211].</li> </ul>
Glenshee Station Limited	1062	Support in part submission 164 ref. 248		<ul style="list-style-type: none"> <li>Support in part in that it requests withdrawal of the plan change, as the changes are unclear and uneconomic for farmers.</li> </ul>
Dunedin City Council	211	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>Aware that CDC and CODC have made submission on this plan change. We are in general support of these submissions [submitter numbers 308 and 309].</li> </ul>
Strath Taieri Community Board	1029	Support submission 211 ref. 248		No reason given.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 211 ref. 248		<ul style="list-style-type: none"> <li>Clarification required to references of 'good quality water' and 'natural and human use values'.</li> <li>Greater flexibility should be introduced (particularly in relation to the timeframes).</li> <li>Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</li> <li>Activities should only be classified as 'prohibited' where they are likely to result in significant adverse effects.</li> </ul>
Fonterra Co-operative Group Limited	241	Not Applicable	Fonterra generally supports the submission of Dairy NZ on the Proposed Plan Change with the emphasis given to the points [in their own submission].	<ul style="list-style-type: none"> <li>Supports Dairy NZ submission [submitter number 146].</li> </ul>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 241 ref. 248		<ul style="list-style-type: none"> <li>Consistent with relief sought by further submitter.</li> </ul>
John Lee & Dennis Pezaro	254	Not Applicable	No decision requested.	<ul style="list-style-type: none"> <li>Are members of the Cardrona Landcare group.</li> <li>Strongly support the submission of the Cardrona Landcare group [submitter number 286].</li> </ul>
ALT Holdings Ltd	274	Not Applicable	No decision requested	<ul style="list-style-type: none"> <li>Agrees with Federated Farmers comments on rule 13.5.1.8A and 13.5.A, support their submissions in respect to this [submitter number 278].</li> </ul>