

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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Index to Original Submitters – By Name

Surname, First Name <u>or</u> Organisation	Submitter #	Surname, First Name <u>or</u> Organisation	Submitter #
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
Anderson, N	231	Cocks, Alastair	334
APS Heckler Family Trust	218	Cole, Stephen	8
B Landreth Ltd	253	Cone, Alan G & Bagrie, Judy	38
Bagrie, Judy & Cone, Alan G	38	Constance, Helen	2
Ballance Agri-Nutrients Ltd	262	Contact Energy Limited	284
Barlow, John	198	Cooper, Sarah	112
Beaton Family	291	Corboy, Paul	94
Belmont	129	Corona Farms Ltd	155
Big River Dairy Limited	299	Coutts, Sue	281
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Black, Gilbert	179	Crawford, Stephen	73
Blair, David	237	Cross Family Trusts	77
Blakely Pacific Limited	209	Cruickshank, Neil Douglas	23
Blumden, Clive	99	Crutchley, GR	42
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Borrie, Peter	69	Dairy NZ Limited	146
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Botting, David	97	de Geest, Nigel	157
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Burgess, Gerald	65	Douglas, Clyde	266
Butler, Graham	216	Dulce-Domum Trust	235
Cain, Mark	91	Dunedin City Council (Water and Waste Services)	211
Calder Stewart Industries Limited	313	Dunedin International Airport Limited	323
Cardrona Land Care Group	286	Dunjey, Dawn	168
Central Otago District Council & Clutha District Council	309	Edwards, Lydia	25
Central Otago Environmental Society Inc	233	Elderslie Dairy Farms Limited	115

Surname, First Name or Organisation	Submitter #	Surname, First Name or Organisation	Submitter #
Elliot, AWB	324	Hayward, Steve	44
Environmental Defence Society	267	Henderson, Duncan	100
Ernslaw One Ltd	149	Hewett Farm Ltd	39
Evans, G	67	Hill, JR	178
Ewing Farms Ltd & Haddington Farms Ltd	177	Hill, Lynne	35
Federated Farmers of New Zealand	278	Hogg, Graeme & Jane	265
Finlay Family Trust	125	Holcim (New Zealand)	224
Fish and Game (Central South Island)	273	Hollamby, Bob	117
Fish and Game (Otago)	287	Hollis, Melvyn	53
Fonterra Co-operative Group Limited	241	Homestead Farm Limited	316
Ford, Martin	5	Hopefield Investments Ltd (C Cochrane)	45
Forest and Bird	271	Hopefield Investments Ltd (R Griffiths)	200
Forest Range Ltd	240	Hopgood, Eric	74
Fox, Barry	110	Horticulture New Zealand	269
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Fox, Roger	82	Hughes, Tony	170
Foxhaven Farms Ltd	135	Hunt, Phillip	60
Fulton Hogan Limited	222	Hunter Valley Station Ltd	166
GB & RE Gardner Partnership	318	Hunter, Graham & Pam	332
Geddes, G & S	50	Invernia Holdings Ltd	83
George, Peter	172	Irrigation New Zealand Incorporated	202
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Lake Edge Farms Ltd	333	Mitchell, Zoe	21
Lakes Landcare	210	ML & PJ Lord Family Trust	143
Latta, John	162	Morrison, Stewart	116
Lee, John & Pezaro, Dennis	254	Mosgiel Taieri Community Board	46
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Loganbrae Ltd	75	Mt Aspiring Station	127
Lone Star Farms Ltd	327	Mulholland, CP	58
Lovells Creek Farm Ltd	189	Munro, EJ	29
Lower Waitaki Irrigation Company	106	Neeley, Eloise	141
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McLaren, DJ & NA	244	Paterson Pitts Partners Ltd	288
McMillan, Alan	104	Paton, ED	92
McNab, Peter	192	Penny, FR & R	19
McNamara, Ruth	160	Pennycuick, Nina	26
McNeilly, Dean	150	Petrie, Tim	85
McTainsh, Albert	122	Pezaro, Dennis & Lee, John	254
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Surname, First Name or Organisation	Submitter #	Surname, First Name or Organisation	Submitter #
Poplar Grove Station Ltd	208	Sopson, Logan	175
PR Lyders Trust	28	Southern District Health Board	103
Preserve Our Water Society Inc	225	Southern Wood Council	289
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Quambatook Ltd	182	Stanger, Trevor	183
Queenstown Lakes District Council	255	Starke, J	17
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Ramsay, Greg & Stott, G	68	Strachan, Wallace Evan	95
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Ravensdown Fertiliser Co-operative Ltd	248	Streeter, Kate	184
Rawle, Colin	4	Stuart, Annie	280
Rawlinson, Michael	121	Sunset Dairy Limited & van Vugt, Rob	317
Rayonier New Zealand Ltd	256	T A Whiteside & Co Ltd	212
Rees Valley Station Limited	41	Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197
Richardson, Andrew & Barbara	156	Telford, Ken	272
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Rimu Downs Ltd	219	The Cow Farm Limited	133
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Robertson, JP	52	Thomas, WH	10
Rowland, Peter	328	Thompson, Jeff & Alison	78
Rowley Family	230	Three Creeks Farm Ltd	56
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Sandy Bay Ltd	249	Trustpower Limited	206
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Schallenberg, Marc	270	Val Ridge Farm Ltd	98
Scott, Donald	30	van Vugt, Rob & Sunset Dairy Limited	317
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Scurr, TM and CM	275	Viewmont Limited	247
SH Andrews and Sons Ltd	61	Waihemo Water Catchment Society Inc	250
Shag Valley Station	36	Waitaki District Council	138
Shalloch Farms Ltd	154	Waitaki Irrigators Collective Limited	257
Shaw, Dave	226	Waitensea Ltd	290
Sheat, Ronald	330	Wales, Jeremy	194
Shennan, Marianne	11	Wallace, Ross & Alexa	101
Silver Fern Farms Limited	238	Watt, James	167
Smale, Dan	180	Waverley Downs Ltd	220
Smith, B & J	259	Wenita Forest Products	279
Smith, M W	300	Werner, Craig	48
Smith, Neil	295	Wharton, David	3

Surname, First Name or Organisation	Submitter #	Surname, First Name or Organisation	Submitter #
Willams, Richard	329	Wilson, Roy A	49
Williams, Barry	12	Windsor Park Dairies Ltd	185
Willowview Pastures Ltd	214	Wyllies Crossing Limited	312
Wilson, Alan L	88	Young, Jane	124
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Submitter #	Surname, First Name <u>or</u> Organisation	Submitter #	Surname, First Name <u>or</u> Organisation
2	Constance, Helen	45	Hopefield Investments Ltd (C Cochrane)
3	Wharton, David	46	Mosguel 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	Dunjey, 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
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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		

Index to Further Submitters – By Name

Surname, First Name <u>or</u> Organisation	Submitter #	Surname, First Name <u>or</u> Organisation	Submitter #
Alliance Group Limited	1060	Hopefield Investments Ltd	1019
Andrew, Mr DJ & Mrs JC	1042	Horticulture New Zealand	1032
Arthur, TJ & NM	1026	Ida Valley Station / Ida Valley Irrigation Co	1033
Auripo Enterprises Ltd	1017	Isa Holdings Ltd	1058
Blackstone Hill Ltd	1075	Lower Waitaki Irrigation Co	1005
Borst, Mr RJ	1034	Mackenzie, Mr NS	1035
Braemorn Farm Ltd	1009	Macraes Community Incorporated	1043
Burdon, Mr RG & Mrs SS	1040	Mainland Poultry Limited	1048
Calder Stewart Industries Limited	1049	McNally, KA & William, JH	1020
Cavanagh, RN & JA	1053	McNally, RJ	1021
Central Otago District Council	1051	McTainsh, Albert	1004
Central Otago Environmental Society	1028	Meridian Energy Limited	1014
Central Otago Wine Growers Association	1054	Michelle, Mr TR	1037
City Forests	1071	Mitchell, Peter	1064
Clutha District Council	1050	Moutere Station Limited	1052
Contact Energy Limited	1013	New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)	1010
Craig, Mr TE & Mrs JA	1041	New Zealand Wind Energy Association	1030
Craiglea Limited	1012	North Otago Irrigation Company	1061
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oceana Gold (NZ) Limited	1072
Dunedin City Council	1025	Otago Fish and Game Council	1027
Dunedin International Airport Limited	1038	Otago Water Resource Users Group	1056
Elliot, Mr AWB	1045	Pringle, Quinten & Bronwyn	1022
Elston, ME	1002	Pypers Produce Ltd	1023
Environmental Defence Society	1055	Rayonier New Zealand Limited	1015
Ernslaw One Ltd	1016	Scott, DJ & KR	1008
Ettrick Fruitgrowers Association Inc	1067	Sheat, Ronald	1018
Federated Farmers of New Zealand	1057	Silver Fern Farms Limited	1070
Fonterra Co-operative Group Limited	1068	Smith, B & J	1006
Forest and Bird NZ	1007	Snowline Ltd	1076
Gardner, Mr GV & Mrs RE	1044	Strath Taieri Community Board	1029
Glenshee Station Limited	1062	Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065
Graham, Mr BJ	1036	Pypers Produce Ltd	1023
Greenfield Rural Opportunities Limited	1077	Rayonier New Zealand Limited	1015
Greer, Mr DC	1039	Scott, DJ & KR	1008
Hawkdun Idaburn Irrigation Company Limited	1066	Sheat, Ronald	1018
Heany, Kim & Mary	1024	Silver Fern Farms Limited	1070
Hodge, Mrs J	1046	Smith, B & J	1006

Snowline Ltd	1076	TrustPower	1059
Strath Taieri Community Board	1029	Van Vught, Mr RP & Mrs RR	1047
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Waitaki District Council	1003
Teviotdowns Ltd	1001	Waitaki Irrigators Collective Limited	1031
The Director-General of Conservation	1011	Webster, John	1063
The NZ Transport Agency	1073	Webster, Nicholas	1069

Index to Further Submitters – By Number

Submitter #	Surname, First Name <u>or</u> Organisation	Submitter #	Surname, First Name <u>or</u> Organisation
1001	Teviotdowns Ltd	1040	Burdon, Mr RG & Mrs SS
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
1010	New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)	1049	Calder Stewart Industries Limited
1011	The Director-General of Conservation	1050	Clutha District Council
1012	Craiglea Limited	1051	Central Otago District Council
1013	Contact Energy Limited	1052	Moutere Station Limited
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
1027	Otago Fish and Game Council	1066	Hawkdun Idaburn Irrigation Company Limited
1028	Central Otago Environmental Society	1067	Etrick Fruitgrowers Association Inc
1029	Strath Taieri Community Board	1068	Fonterra Co-operative Group Limited
1030	New Zealand Wind Energy Association	1069	Webster, Nicholas
1031	Waitaki Irrigators Collective Limited	1070	Silver Fern Farms Limited
1032	Horticulture New Zealand	1071	City Forests
1033	Ida Valley Station / Ida Valley Irrigation Co	1072	Oceana Gold (NZ) Limited
1034	Borst, Mr RJ	1073	The NZ Transport Agency
1035	Mackenzie, Mr NS	1074	DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership
1036	Graham, Mr BJ	1075	Blackstone Hill Ltd
1037	Michelle, Mr TR	1076	Snowline Ltd
1038	Dunedin International Airport Limited	1077	Greenfield Rural Opportunities Limited
1039	Greer, Mr DC		

1.1 Section 7.1 - Introduction

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Pioneer Generation	147	Amend	That Section 7 (Water Quality) include an introduction section, which sets out the key resource management issues to be addressed by the objectives and policies. The section must give effect to, and thus be consistent with the policy outcomes provided for within the NPSFM and the RPS.	<ul style="list-style-type: none"> Section 7 not supported by discussion on key issues guiding policy framework.
<i>Contact Energy Limited</i>	1013	<i>Support submission 147 ref. 1.1</i>		<ul style="list-style-type: none"> Reasons set out in submission.
<i>Alliance Group Limited</i>	1060	<i>Support submission 147 ref. 1.1</i>		<ul style="list-style-type: none"> Alliance seeks that the existing Introduction is retained, incorporating amendments to give effects to the plan change where appropriate, for reasons in its original submission.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 147 ref. 1.1</i>		<ul style="list-style-type: none"> Amending Section 7.1 to provide guidance on the key resource management issues, and to ensure consistency with the NPS [FW] and the RPS, is supported.
Alliance Group Limited	187	Amend	Retain an introduction in Section 7, amended to be consistent with the Plan Change.	<ul style="list-style-type: none"> Removal creates uncertainty regarding what the proposed provisions set out to achieve. Unhelpful that all explanatory text removed. Doesn't assist with simplifying or streamlining. Inclusion enhances understanding and implementation of various provisions.
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 1.1</i>		<ul style="list-style-type: none"> Agrees that removal of introduction creates uncertainty.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 187 ref. 1.1</i>		<ul style="list-style-type: none"> Amending Section 7.1 to provide explanatory text is supported.
Trustpower Limited	206	Amend	Amend the Introduction to provide certainty as to which parts of the current Plan Change and any future plan changes would relate to	<ul style="list-style-type: none"> Captures discharges from renewable electricity generation. Unclear if activities relate to "industrial and trade premises" or are covered in

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			renewable electricity generation activities.	12.C. • Make clear that discharges from renewable electricity generation are captured under 12.C, as advised by ORC staff.
Contact Energy Limited	1013	Support submission 206 ref. 1.1		• Supports submission's intent. • If renewable electricity generation is to be covered in section 12.C, it should be made clear in an introduction.
New Zealand Wind Energy Association	1030	Support submission 206 ref. 1.1		• Supports amendment to the introduction section 7.1. • Provides certainty as to which parts of the plan relate to renewable electricity generation activities.
Jeremy Bisson	223	Amend	Opposed to the removal of this introductory statement in its entirety. The ORC should at least re-draft this introduction and explain its overall approach to water quality in Otago.	• Questions the reasons for the removal of the introduction. • Does ORC no longer support the existing introduction.
Environmental Defence Society	267	Amend	Reinstate the introduction and amend to be consistent with other changes sought in this submission.	• Serves to focus policy and rule framework. • Ensures reader has greater understanding of underlying rationale for approach taken.
Contact Energy Limited	1013	Oppose submission 267 ref. 1.1		• Opposes several submissions from the submitter. • Oppose an introductory discussion reflecting the submitter's view. • Support the reinstatement of an introductory discussion.
Mr RJ Borst	1034	Support in part submission 267 ref. 1.1		• Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.
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 267 ref. 1.1		• Oppose submission in that it supports plan change and use of prohibited activity status.
Sue Coutts	281	Amend	At the very least Introduction should cover off the points made in the NPSFW; • Freshwater is essential to NZ's economic, environmental, cultural and social wellbeing. • All New Zealanders have a common interest in ensuring the country's freshwater is managed wisely.	• NPS states local authorities are to manage water in an integrated and sustainable way. • Removing the introduction separates the policies, methods and targets from the broader context that provides for decision making.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<ul style="list-style-type: none"> • ORC is required to manage freshwater in an integrated and sustainable way. • Freshwater is valued for a large number of important reasons, which include both use values and intrinsic values. 	

2 Section 7.2 - Issues in general

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
NZ Transport Agency	203	Amend	Include Issues in Chapter 7: Water Quality.	<ul style="list-style-type: none"> • Including issues about water quality assists plan users to understand why new objectives and policies have been adopted.
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 203 ref. 2</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Support submission 203 ref. 2</i>		<ul style="list-style-type: none"> • <i>Amending Section 7.2 to include issues is supported.</i>
Environmental Defence Society	267	Amend	Reinstate the issues relating to water quality, and amend to be consistent with other changes sought in this submission.	<ul style="list-style-type: none"> • Serves to focus policy and rule framework. • Ensures reader has greater understanding of underlying rationale for approach taken.
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support in part submission 267 ref. 2</i>		<ul style="list-style-type: none"> • <i>Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 267 ref. 2</i>		<ul style="list-style-type: none"> • <i>Oppose submission in that it supports plan change and use of prohibited activity status.</i>
Fish and Game (Central South Island)	273	Amend	Reinsertion of the issues and contextual information. If the current issues are not appropriate, then they should be amended, rather than removed.	<ul style="list-style-type: none"> • Concerned at deletion of issues and contextual information. • Maintain high level issues outlining key challenges for water management. • Fix issue omission that is causing poor water quality in Otago.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Addition of the following issue: "Issue: The intensification of agricultural land use can lead to adverse effects on waterways, and this requires tight management and monitoring."	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 2</i>		<ul style="list-style-type: none"> • <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>Waitaki Irrigators Collective Limited</i>	1031	<i>Oppose submission 273 ref. 2</i>		<ul style="list-style-type: none"> • <i>Additional issue would not improve the Plan</i> • <i>Vary vague and ill-defined.</i> • <i>Contrary to the effects-based approach.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 2</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 273 ref. 2</i>		<i>Opposes reference to "tight management": contrary to the effects-based approach, which is supported.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 273 ref. 2</i>		<ul style="list-style-type: none"> • <i>Issue covered elsewhere.</i> • <i>Limits/timeframes ensure management and monitoring of effects.</i>
Sue Coutts	281	Amend	Issue should outline the key water quality issues for our region that the objectives, policies and methods are intended to address. These would include both point source and nonpoint source impacts on water quality. These would vary by area as there is provision in the NPSFW for variation in expectation and activity area by area within a region so long as the overall quality of freshwater within a region is maintained or improved.	<ul style="list-style-type: none"> • Allows protection of outstanding freshwater bodies, protecting significant wetlands, improving degraded water. • Removing the issues separates the policies, methods and targets from the broader context that provides for decision making.
Fish and Game (Otago)	287	Amend	Seek reinsertion of the Issues and contextual information. If the current issues are not appropriate, then they should be amended, rather than removed.	<ul style="list-style-type: none"> • Concerned at deletion of issues and contextual information. • Maintain high level issues outlining key challenges for water management. • Omission of issue that is causing poor water quality in Otago.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Addition of the following issue: "Issue: The intensification of agricultural land use can lead to adverse effects on waterways, and this requires tight management and monitoring."	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 2</i>		<ul style="list-style-type: none"> • <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>Central Otago Environmental Society</i>	1028	<i>Support submission 287 ref. 2</i>		<ul style="list-style-type: none"> • <i>Outline of related issues essential for public understanding and acceptance.</i> • <i>Proposed amendment re "intensification" addresses a matter of major public concern.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 287 ref. 2</i>		<ul style="list-style-type: none"> • <i>Need to identify key issues.</i>
<i>Horticulture New Zealand</i>	1032	<i>Oppose in part submission 287 ref. 2</i>		<ul style="list-style-type: none"> • <i>Issue regarding identification of agricultural land use is unclear.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 2</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
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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	<i>Oppose submission 287 ref. 2</i>		<ul style="list-style-type: none"> • <i>Issue covered elsewhere.</i> • <i>Limits/timeframes ensure management and monitoring of effects.</i>

5 Section 7.3 - Issues related to point source discharges to water

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Silver Fern Farms Limited	238	Oppose	Opposes this deletion and seeks the provision for mixing zones be retained.	<ul style="list-style-type: none"> No provision for point source discharges or mixing zones. Contrary to RMA s70 and s107.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 238 ref. 5</i>		<i>Mixing zones should be included as effective and natural mechanism for attenuating contaminants.</i>
<i>Isa Holdings Ltd</i>	1058	<i>Support submission 238 ref. 5</i>		<i>Supports mixing zones being included in the plan.</i>

6 Issue 7.3.1 - Large mixing zones

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Jane Young	124	Support	Support the removal of this provision.	<ul style="list-style-type: none"> No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 124 ref. 6</i>		<i>Silver Fern Farms submitted against the deletion of Section 7.3 issues related to point source discharges to water, for the reasons stated in its original submission and therefore opposes the submission supporting its removal.</i>

11 Issue 7.4.1 - Land use activities

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Silver Fern Farms Limited	238	Oppose	This be retained or at least the intent be retained in order to distinguish between the two types of discharges and the fact that point source discharges are controlled and monitored by resource consents.	<ul style="list-style-type: none"> Disagree with removal of statement that non-point source harder to control, and can undermine water quality efforts.

14 Section 7.5/7.A - Objectives

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ernslaw One Ltd	149	Amend	Amendment to objectives as may be required to support relief requested for rules in Chapter 12.	<ul style="list-style-type: none"> Supports intent. Opposes objectives as they support stringent permitted and prohibited activity standards in Chapter 12.
Alliance Group Limited	187	Amend	Add the following Objective (or similar): "7.A.4 To recognise the significant social and economic benefits that may be derived from undertaking industrial or trade related discharges into the region's waterways."	<ul style="list-style-type: none"> Recognise and provide for positive benefits of discharges.
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 14</i>		<i>Agrees objectives and policies should recognise positive effects of discharges and balance different values.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 187 ref. 14</i>		<ul style="list-style-type: none"> • <i>The discharge of industrial or trade related contaminants to water is opposed.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 187 ref. 14</i>		<ul style="list-style-type: none"> • <i>Support the new Objective in so far as it seeks to recognise and provide for the positive benefits of discharges.</i>
Irrigation New Zealand Incorporated	202	Amend	Rewrite Objectives 7.A.1 - 3.	<ul style="list-style-type: none"> • Vague, open to interpretation. • Do not adequately describe desired outcomes. • Repeats RMA and RPS, provide no further guidance.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 202 ref. 14</i>		<ul style="list-style-type: none"> • <i>The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 14</i>		<ul style="list-style-type: none"> • <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>
Blakely Pacific Limited	209	Amend	Amendment to objectives as may be required to support relief requested for rules in Chapter 12.	<ul style="list-style-type: none"> • Supports intent of the objectives. • Opposes objectives as support stringent permitted and prohibited activity standards.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 209 ref. 14</i>		<ul style="list-style-type: none"> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 14</i>		<ul style="list-style-type: none"> • <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i>
Meridian Energy Limited	251	Amend	Existing Objective 7.5.1 is more appropriate for achieving the sustainable management purpose of the RMA, in particular a balance of values, than the proposed objectives.	<ul style="list-style-type: none"> • Proposed objectives not most appropriate way to achieve purpose of the RMA. • Too much subjectivity and impracticality around "good water quality".
<i>Contact Energy Limited</i>	1013	<i>Support submission 251 ref. 14</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission</i>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 251 ref. 14</i>		<ul style="list-style-type: none"> • <i>For reasons given by submitter.</i>
<i>TrustPower</i>	1059	<i>Support submission 251 ref. 14</i>		<ul style="list-style-type: none"> • <i>Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn.</i> • <i>Reasons in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that original Policy 7.5.1 is retained and proposed Objective</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 251 ref. 14</i>		<i>7.A.1 is withdrawn for reasons in its original submission.</i>
Rayonier New Zealand Ltd	256	Amend	Amendment to objectives as may be required to support relief requested for rules in Chapter 12.	<ul style="list-style-type: none"> • Supports intent. • Opposes objectives as they support stringent permitted and prohibited activity standards in Chapter 12.
North Otago Irrigation Company <i>John Webster</i>	260 1063	Support <i>Support submission 260 ref. 14</i>	Supports Objectives.	<ul style="list-style-type: none"> • No reason given. • <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. 14</i>		<ul style="list-style-type: none"> • <i>Support the NOIC submission in full.</i>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Clarify references to "good" water quality and "natural and human use values".	<ul style="list-style-type: none"> • Largely supports objectives 7.A.1 to 7.A.3 in their present form. • Phrases are relativistic, should be linked to farming and rural uses. • Supports focus on controlling contaminants, not land uses per se - gives appropriate flexibility to land managers. • Objectives largely meet ss 5 and 7(b) RMA.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 263 ref. 14</i>		<ul style="list-style-type: none"> • <i>The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</i> • <i>However, agrees with a number of the points made in the submission.</i>
Forest and Bird	271	Amend	Add a new objective: "To regularly monitor water quality throughout Otago and take action when water quality standards are not met".	<ul style="list-style-type: none"> • Plan Change depends on monitoring and enforcement.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 14</i>		<ul style="list-style-type: none"> • <i>Not all waterways need to be enhanced.</i> • <i>Background data required before any agricultural activities are restricted.</i>
<i>Central Otago Environmental Society</i>	1028	<i>Support submission 271 ref. 14</i>		<ul style="list-style-type: none"> • <i>Plan's effectiveness requires stringent monitoring regime.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 14</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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
<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. 14</i>		<ul style="list-style-type: none"> • <i>Regular monitoring difficult.</i> • <i>Concerns regarding appropriateness and taking account of individual circumstances.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 14</i>		<ul style="list-style-type: none"> • <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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 271 ref. 14</i>		<ul style="list-style-type: none"> • <i>Ensures that contaminants being discharged directly or indirectly to water are reduced.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 14</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Fish and Game (Central South Island)	273	Amend	Include explanations under the objectives.	<ul style="list-style-type: none"> • Provides guidance toward interpreting objectives. • Provides certainty.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 14</i>		<ul style="list-style-type: none"> • <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>Contact Energy Limited</i>	1013	<i>Oppose submission 273 ref. 14</i>		<ul style="list-style-type: none"> • <i>Without clarity as to what the explanations would say, it is not possible to determine the effect if the submission were accepted.</i> • <i>Agrees that explanations might assist interpretation of the objectives.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 14</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 14</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Wenita Forest Products City Forests Limited	279 283	Amend	Amendment to objectives as may be required to support relief requested for rules in Chapter 12.	<ul style="list-style-type: none"> • Supports intent of the objectives. • Opposes objectives as they support stringent permitted and prohibited activity standards in Chapter 12.
Calder Stewart Industries Limited	1049	Support submissions 279 & 283 ref. 14		<ul style="list-style-type: none"> • Agree with submission in relation to Objectives and policies. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. • Matters relating to reasonable mixing need to be reconsidered.
Fish and Game (Otago)	287	Amend	The wording of a new objective "To provide public information on water management in Otago in a transparent and consistent way" is requested, along with corresponding policies and methods as appropriate as detailed in this submission.	<ul style="list-style-type: none"> • Public interest in water management needs reaffirming. • Public must be provided with information about long term rights of discharge to waterways which are permitted. • With no Anticipated Environmental Results, the plan needs an objective to link it to water quality monitoring and SOE reporting.
Craiglea Limited	1012	Oppose submission 287 ref. 14		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
Mr RJ Borst	1034	Oppose submission 287 ref. 14		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
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	Oppose submission 287 ref. 14		<ul style="list-style-type: none"> • Alliance opposes new objectives and policies that are unbalanced, or result in the Water Plan being unbalanced, and are inconsistent with the RMA definition of sustainable management.
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Alliance Group Limited	1060			<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 287 ref. 14		
Southern Wood Council	289	Amend	Amendment to objectives as may be required to support relief requested for rules in Chapter 12.	<ul style="list-style-type: none"> • Supports intent of the objectives. • Opposes objectives as they support stringent permitted and prohibited activity standards in Chapter 12.
Clydevale Dairy Farms Ltd	297	Amend	Amend the existing objectives or add further objectives that achieve the purpose of the Act and give effect to the NPS and RPS. In particular, the objectives must acknowledge that some discharges	<ul style="list-style-type: none"> • Too narrowly focused; do not provide for other matters under RMA. • Natural and human use values are not the only values to be considered. • Phrase 'good water' quality may be difficult when assessing applications, as it

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			to water support the community's social and economic wellbeing.	ignores variable water quality.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 297 ref. 14</i>		<ul style="list-style-type: none"> Existing objectives should be amended to ensure consistency with the RMA and to give full effect to NPS and RPS. Economic and social values should be considered.
Greenfield Farming Ltd	298	Amend	Amend the existing objectives or add further objectives that achieve the purpose of the Act and give effect to the NPS and RPS. In particular, the objectives must acknowledge that some discharges to water support the community's social and economic wellbeing.	<ul style="list-style-type: none"> Too narrowly focused; do not provide for other matters under RMA. Natural and human use values are not the only values to be considered. Phrase 'good water' quality may be difficult when assessing applications, as it ignores variable water quality.
Big River Dairy Limited	299	Amend	Amend the existing objectives or add further objectives that achieve the purpose of the Act and give effect to the [NPSFW] and RPS. In particular, the objectives must acknowledge that some discharges to water support the community's social and economic wellbeing.	<ul style="list-style-type: none"> Too narrowly focused; do not provide for other matters under RMA. Natural and human use values are not the only values to be considered. Phrase 'good water' quality may be difficult when assessing applications, as it ignores variable water quality.
The Director-General of Conservation	306	Amend	The giving of full effect to the following new objective, or to like effect: "7.A.4 To monitor water quality and to be able to react positively, effectively and rapidly when and where water quality is poor".	<ul style="list-style-type: none"> Proposal is fundamentally dependent on monitoring, but this is not evident.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> 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. Restrictions are inappropriate and have adverse effects on farming operations. No need for further restrictions on discharges. Requires and enormous number of staff to monitor.
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> 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>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> No reason given.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> Nothing to be gained from introducing a high and costly level of consenting requirements (see submitter's other sought changes) if ORC cannot monitor and enforce provisions. Proposed changes would require an enormous number of staff to monitor.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
<i>Hawkdun Station</i>	1053			
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> • Nothing to be gained from introducing a high and costly level of consenting requirements (see submitter's other sought changes) if ORC cannot monitor and enforce provisions. • Proposed changes would require an enormous number of staff to monitor.
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose in part submission 306 ref. 14</i>		<ul style="list-style-type: none"> • Addressed elsewhere.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> • Alliance opposes new objectives and policies that are unbalanced, or result in the Water Plan being unbalanced, and are inconsistent with the RMA definition of sustainable management.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 306 ref. 14</i>		<ul style="list-style-type: none"> • Monitoring of water quality is supported.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 14</i>		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.

15 Objective 7.5.1 / 7.A.1 - Good quality water

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alastair Rutherford	105	Support	Keep as proposed.	<ul style="list-style-type: none"> • Best to have individuals and communities manage the effects.
The Cow Farm Limited	133	Amend	<p>Change the objective to provide guidance and quantifiable parameters for what 'good quality water' means.</p> <p>Change the objective to provide guidance and quantifiable parameters for what 'human use values' means.</p>	<ul style="list-style-type: none"> • The term "good quality" vague and open to interpretation. • Does the term "human use values" include economic considerations?

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Contact Energy Limited	1013	Oppose submission 133 ref. 15		<ul style="list-style-type: none"> The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted. Agrees with the thinking underlying the submission.
New Zealand Pork Industry Board	145	Amend	Amend 7.A.1 to state: "To maintain or enhance the quality of water in Otago's water bodies to support their natural and natural human use values."	<ul style="list-style-type: none"> Term 'good' too subjective, unless directly referenced to parameters in Table 15.1 - Schedule 15.
Contact Energy Limited	1013	Support submission 145 ref. 15		<ul style="list-style-type: none"> Reasons set out in submission.
Otago Fish and Game Council	1027	Support in part submission 145 ref. 15		<ul style="list-style-type: none"> Water quality in upper catchments could degrade to something less than what they currently are.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Oppose in part submission 145 ref. 15		<ul style="list-style-type: none"> Retain the reference to maintaining good water quality but reference Table 15.1.
Fonterra Co-operative Group Limited	1068	Support submission 145 ref. 15		<ul style="list-style-type: none"> Provides greater clarity. Water quality is contextual and relates to community values.
Dairy NZ Limited	146	Amend	Change the objective to one that more clearly specifies the numerical water quality objectives sought and explicitly link the objective to Schedule 15. For example: "To have good quality water in Otago's water bodies that support natural and human use values by managing activities to achieve the narrative and numerical standards specified in Schedule 15 "Schedule of good quality water".	<ul style="list-style-type: none"> A more complete list of numerical water quality objectives would provide greater certainty for plan as a whole and specifically resource consent applications. Is Schedule 15 meant to define objective? Narrative descriptions not backed with numerical definitions.
Forest and Bird NZ	1007	Support in part submission 146 ref. 15		<ul style="list-style-type: none"> Supports the need for the objective to include numerical targets for water quality categories and link to Schedule 15.
Otago Fish and Game Council	1027	Support submission 146 ref. 15		<ul style="list-style-type: none"> Support the need for the objective to include numerical targets for water quality and the link to Schedule 15.
Environmental Defence Society	1055	Support in part submission 146 ref. 15		<ul style="list-style-type: none"> The objective needs to include numerical targets and to be based on parameters in Table 15.1 - Schedule 15.
TrustPower	1059	Oppose submission 146 ref. 15		<ul style="list-style-type: none"> Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn. Reasons in original submission.
Alliance Group Limited	1060	Oppose submission 146 ref. 15		<ul style="list-style-type: none"> Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 146 ref. 15		<ul style="list-style-type: none"> Clarification required to references of 'good water quality' and 'natural and human use values'.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose in part submission 146 ref. 15		<ul style="list-style-type: none"> Oppose any aspects of the submission that are contrary to the further submitter's primary submission.
Pioneer Generation	147	Oppose	That Objective 7.5.1 of the operative version of Section 7 (Water Quality) of the Regional Plan be retained and that Objective 7.A.1 be deleted. Any similar amendments to like effect.	<ul style="list-style-type: none"> "Good water quality" not referred to or defined in NPS, RPS, or RMA, inappropriately subjective and leaves objectives and policies open to divergent interpretations Outstanding water bodies not provided for.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Any consequential amendments that stem from the amendment set out above. That the term 'good quality water' be deleted from Section 7 (Water Quality).	
<i>Horticulture New Zealand</i>	1032	<i>Support submission 147 ref. 15</i>		• <i>For reasons given by submitter.</i>
<i>TrustPower</i>	1059	<i>Support submission 147 ref. 15</i>		• <i>Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn.</i> • <i>Reasons in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 147 ref. 15</i>		• <i>Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 147 ref. 15</i>		• <i>Retain objectives that provide for the maintenance and enhancement of water quality.</i> • <i>Amending these objective to provide for the protection of outstanding freshwater bodies is supported.</i>
Alliance Group Limited	187	Oppose	Retain original Objective 7.5.1 without amendments.	• Original wording allows for balance in values required by RMA section 5(2). • Not effective or efficient for objectives to seek to achieve characteristics across Otago that are only plausible for a limited number of waterways when rainfall events have not recently occurred.
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 15</i>		• <i>Agrees objectives and policies should recognise positive effects of discharges and balance different values.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 15</i>		• <i>Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn.</i> • <i>Reasons in original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa</i>	1065	<i>Oppose submission 187</i>		• <i>Retain objectives that provide for the maintenance and enhancement of the characteristics of good water quality.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Runaka Puketeraki, Hokonui Runanga</i>		<i>ref. 15</i>		
Dairy Holdings Limited	195	Amend	There is a need to: - better define, and link the objective to, the values in Schedule 15 (see elsewhere in this submission); and - amend the objective to "recognise natural and human use values".	<ul style="list-style-type: none"> • Support intent of good water quality. • 'Natural and human use values' need to be determined on a case-by-case basis, not well defined. • Unclear whether Schedule 15 intended to define the objective. • Objective will not always be met, or tension between relevant matters. • Use of the word 'support' unclear. • Objective not clear, provides little useful direction to implement the plan change.
<i>Waitaki Irrigators Collective Limited</i>	<i>1031</i>	<i>Support submission 195 ref. 15</i>		<ul style="list-style-type: none"> • <i>Submission outlines concern of further submitter.</i>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 195 ref. 15</i>		<ul style="list-style-type: none"> • <i>Support in part, particularly regarding wider effect of the plan change.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 195 ref. 15</i>		<ul style="list-style-type: none"> • <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i> • <i>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</i>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	That Objective 7.A.1 be retained as currently drafted.	<ul style="list-style-type: none"> • Supports objective.
<i>TrustPower</i>	<i>1059</i>	<i>Oppose submission 197 ref. 15</i>		<ul style="list-style-type: none"> • <i>Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn.</i> • <i>Reasons in original submission.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Oppose submission 197 ref. 15</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.</i>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 197 ref. 15</i>		<ul style="list-style-type: none"> • <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. 15</i>		<ul style="list-style-type: none"> • <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
Irrigation New Zealand Incorporated	202	Amend	Schedule 1 needs to be updated as part of this plan change.	<ul style="list-style-type: none"> • Human use values mentioned in the objective need to include water supply for irrigation.
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 202 ref. 15</i>		<ul style="list-style-type: none"> • <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>
NZ Transport Agency	203	Amend	Reinstate the word 'their' in the objective.	<ul style="list-style-type: none"> • Removal of 'their' widens the objective. • Some water bodies may not support all natural and human use values.
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 203 ref. 15</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
Trustpower Limited	206	Oppose	Reject the plan change.	<ul style="list-style-type: none"> • Not most appropriate way to achieve purpose of RMA as required by S32. • No improvement to existing wording [of 7.5.1] given arbitrary nature of 'good quality water'.
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 206</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 15</i>		
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 206 ref. 15</i>		<ul style="list-style-type: none"> • Retain objectives that provide for the maintenance and enhancement of the characteristics of good water quality.
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support in part submission 206 ref. 15</i>		<ul style="list-style-type: none"> • 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.
Dunedin City Council	211	Amend	That Objective 7.A.1 be amended by: reinstating the word 'their', acknowledging the need to balance the environmental, cultural, social and economic aspects of water management.	<ul style="list-style-type: none"> • Inconsistent with NPS Freshwater 2011, RMA 1991 and RPS. • Removing 'their' has widened objective and does not acknowledge some water bodies may not support all natural and human uses. • Objective has very narrow focus and does not recognise other factors that need to be balanced against natural and human use values.
<i>Contact Energy Limited</i>	1013	<i>Support submission 211 ref. 15</i>		<ul style="list-style-type: none"> • Reasons set out in submission.
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 211 ref. 15</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 15</i>		<ul style="list-style-type: none"> • No reason given.
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 15</i>		<ul style="list-style-type: none"> • Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.
<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. 15</i>		<ul style="list-style-type: none"> • 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).
<i>Vivienne & Greg Kerr</i>	213	Support	Support.	<ul style="list-style-type: none"> • No reason given.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 213 ref. 15</i>		<ul style="list-style-type: none"> • Does not give flexibility to existing farming operations. • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Fulton Hogan Limited	222	Amend	Support with amendments that remove the uncertainty associated with the term "good water quality".	<ul style="list-style-type: none"> • Uncertainty generated with use of "good quality water". • Link between Schedule 15 and "good water quality" is unclear.
Jeremy Bisson	223	Oppose	Opposes proposed 7.A.1.	<ul style="list-style-type: none"> • Existing objective is weakened by proposed amendments. • New objective allows current water quality to be compromised as long as it still meets criteria of 'good water quality'. • Represents a shift in ORC philosophy and is contrary to NPSFW Objective A2.
Holcim (New Zealand) Limited	224	Amend	Support with amendments that remove the uncertainty associated with the term "good water quality".	<ul style="list-style-type: none"> • Uncertainty generated with the use of "good quality water". • Link between Schedule 15 and "good water quality" is unclear.
Preserve Our Water Society Inc	225	Oppose	Original Objective 7.5.1 should remain as it is.	<ul style="list-style-type: none"> • Proposed objective fails to protect existing water quality and will allow water to become polluted.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 225 ref. 15</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Silver Fern Farms Limited	238	Amend	That the values of industry and the provision for dilution/mixing zones are appropriately recognised and retained. This objective	<ul style="list-style-type: none"> • Excludes NPSFW requirement that industry and dilution are values. • "Good water quality" vague.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			also needs to link to Schedule 15, if this was what was intended.	• No link to Schedule 15.
<i>Isa Holdings Ltd</i>	1058	<i>Support in part submission 238 ref. 15</i>		<i>Supports mixing zones being included in the plan.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 238 ref. 15</i>		• <i>The discharge of industrial or trade related contaminants to water is opposed.</i>
Fonterra Co-operative Group Limited	241	Amend	Change the objective to one that more clearly specifies the numerical water quality objectives sought and explicitly link the objective to Schedule 15. For example: "To have good quality water in Otago's water bodies that support natural and human use values by managing activities to achieve the narrative and numerical standards specified in Schedule 15 "Schedule of good quality water".	<ul style="list-style-type: none"> • A more complete list of numerical water quality objectives would provide a greater level of certainty for the plan as a whole and specifically for resource consent applications. • Is Schedule 15 meant to define objective? • Narrative descriptions not backed with numerical definitions.
<i>Forest and Bird NZ</i>	1007	<i>Support in part submission 241 ref. 15</i>		• <i>Supports the need for the objective to include numerical targets for water quality categories</i>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 241 ref. 15</i>		• <i>"Goal" of the plan change is identified.</i>
<i>Environmental Defence Society</i>	1055	<i>Support in part submission 241 ref. 15</i>		• <i>The objective needs to include numerical targets.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 241 ref. 15</i>		<ul style="list-style-type: none"> • <i>Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn.</i> • <i>Reasons in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 241 ref. 15</i>		• <i>Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons 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. 15</i>		<ul style="list-style-type: none"> • <i>Consistent with relief sought by further submitter.</i> • <i>Clarification required to references of 'good water quality' and 'natural and human use values'.</i>
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Objective 7.A.1 be amended to state: "... recognise natural and human use values". As an alternative, if issues around "good quality water" are not addressed then seeks Objective 7.5.1 of the operative version of section 7 (Water Quality) of the Regional Plan be retained, and the deletion of proposed Objective 7.A. 1 and the term "good quality water" is sought from section 7.	<ul style="list-style-type: none"> • Supports principle of Objective 7.A. 1, however is subject to concerns raised regarding Schedule 15 and Table 15.1. • Values not well defined and there is scope for them to be determined on a case by case basis. • Define what is meant by 'good water quality' as not defined in water plan, NPSFW, or RMA. • Address what supporting 'natural and human use values' means.
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 15</i>		<ul style="list-style-type: none"> • <i>Schedule 15 values are not well defined.</i> • <i>Unclear how values will be determined consistently.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & 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 & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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	Amend	Objective 7.A.1 be amended to state: "... recognise natural and human use values". As an alternative, if issues around "good quality water" are not addressed then seeks Objective 7.5.1 of the operative version of section 7 (Water Quality) of the Regional Plan be retained, and the deletion of proposed Objective 7.A. 1 and the term "good quality water" is sought from section 7.	<ul style="list-style-type: none"> • Supports principle of Objective 7.A. 1, however is subject to concerns raised regarding Schedule 15 and Table 15.1. • Values not well defined and there is scope for them to be determined on a case by case basis. • Define what is meant by 'good water quality' as not defined in water plan, NPSFW, or RMA. • Need to address what supporting 'natural and human use values' means.
<i>Mr RJ Borst</i>	1034	Support submission 252 ref. 15		<ul style="list-style-type: none"> • <i>Schedule 15 values are not well defined.</i> • <i>Unclear how values will be determined consistently.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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	Oppose submission 252 ref. 15		<ul style="list-style-type: none"> • <i>Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn.</i> • <i>Reasons in original submission.</i>
<i>Alliance Group Limited</i>	1060	Oppose submission 252 ref. 15		<ul style="list-style-type: none"> • <i>Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Waitaki Irrigators Collective Limited	257	Amend	Schedule 1 should be amended to include irrigation as a use value.	<ul style="list-style-type: none"> • Use of water essential for primary production growth. • Recognise as significant use value.
Ballance Agri-Nutrients Ltd	262	Amend	<p>Objective 7.A.1 be amended to state: "... recognise natural and human use values".</p> <p>As an alternative, if issues around "good quality water" are not addressed then seeks Objective 7.5.1 of the operative version of section 7 (Water Quality) of the Regional Plan be retained, and the deletion of proposed Objective 7.A. 1 and the term "good quality water" is sought from section 7.</p>	<ul style="list-style-type: none"> • Supports principle of Objective 7.A. 1, but subject to concerns raised regarding Schedule 15 and Table 15.1. • Values not well defined and there is scope for them to be determined on a case by case basis. • Define what is meant by 'good water quality'. • Address what supporting 'natural and human use values' means.
<i>Meridian Energy Limited</i>	1014	<i>Support in part submission 262 ref. 15</i>		<ul style="list-style-type: none"> • <i>Human use values are not suitably recognised in Objective 7.A.1 & should be factored into the management of water quality expectations.</i> • <i>Table 15.1 uses nebulous characteristics to define "good quality water".</i>
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 15</i>		<ul style="list-style-type: none"> • <i>Schedule 15 values are not well defined.</i> • <i>Unclear how values will be determined consistently.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Environmental Defence Society	267	Amend	<p>Amend the objectives so that there is an explanation as to where in the plan 'good quality' is defined in a measurable way, and what the intent of the objective is.</p> <p>Add an explanation of 'natural and human use values' or define what is meant by these terms in the plan. Natural use values should encompass intrinsic values set out in the NPSFW.</p> <p>Add a realistic timeframe for all water bodies to have 'good quality water' that supports natural values.</p>	<ul style="list-style-type: none"> • Objective too vague as to what is "good quality". • What values good water quality is intended to support. • Objectives should be more specific, measurable, realistic and time-bound.
<i>Forest and Bird NZ</i>	1007	<i>Support submission 267 ref. 15</i>		<ul style="list-style-type: none"> • <i>Natural use values need defining and should encompass intrinsic values as per NPSFW.</i>
<i>Contact Energy Limited</i>	1013	<i>Support/Oppose</i>		<ul style="list-style-type: none"> • <i>Supports the suggestion that natural & human use values should be defined,</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr RJ Borst</i>	1034	<i>in part submission 267 ref. 15</i>		<i>with reference to the NPS Freshwater Management.</i> • <i>Opposes the implication that not all of the values identified as relevant by the NPS should be considered.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 15</i>		<ul style="list-style-type: none"> • <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. 15</i>		<ul style="list-style-type: none"> • <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>
Colin Scurr	268	Amend	Amend the objective or provide additional Objectives that provide for other relevant matters under the Act, such as the national values of freshwater listed in the NPS.	<ul style="list-style-type: none"> • <i>Placing natural and human use values above all others is not consistent with RMA.</i> • <i>Implication is any adverse effects on natural or human use values is unacceptable.</i> • <i>Concept of 'good water quality' applying to entire region is arbitrary.</i> • <i>Does not reflect water quality variations across the region.</i>
Horticulture New Zealand	269	Oppose	Delete objective or undertake a review of the natural and human use values and amend Schedule 15 so that natural and human use values are supported and achievable.	<ul style="list-style-type: none"> • <i>Natural and human use values to be reviewed to ensure all appropriate values are included.</i> • <i>Limits set so land use activities likely to be severely constrained so human use values won't be met.</i>
<i>Contact Energy Limited</i>	1013	<i>Support in part submission 269 ref. 15</i>		<ul style="list-style-type: none"> • <i>Supports the concept of a review of human and use values if they are the focus of Schedule 15.</i> • <i>These values should be both supported and achievable.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 269 ref. 15</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>TrustPower</i>	1059	<i>Support submission 269</i>		<ul style="list-style-type: none"> • <i>Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn.</i> • <i>Reasons in original submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 15</i>		
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 15</i>		<ul style="list-style-type: none"> • Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 15</i>		<ul style="list-style-type: none"> • Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support in part submission 269 ref. 15</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Support submission 269 ref. 15</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
Forest and Bird	271	Amend	<p>Amend to read: "To maintain or enhance waters with very good or excellent water quality and have good quality water in Otago's water bodies and contiguous coastal waters that support natural and human use values." Or; "To have good quality water in Otago's water bodies and contiguous coastal waters and prevent any deterioration in water quality to support natural and human use values." Add definitions for 'good', 'very good' and 'excellent' water quality based on SOE Surface Water Quality 2007 report.</p>	<ul style="list-style-type: none"> • Current objective does not aim to retain existing very good to excellent water quality. • Water bodies at risk of being downgraded. • NZCPS 2010 requires inclusion of contiguous coastal waters.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 271 ref. 15</i>		<ul style="list-style-type: none"> • "Goal" of the plan change is identified.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Not all waterways need to be enhanced. • Background data required before any agricultural activities are restricted.
<i>Contact Energy Limited</i>	1013	<i>Oppose in part submission 271 ref. 15</i>		<ul style="list-style-type: none"> • An objective of preventing any (bold) deterioration in water quality is unachievable and not required by the NPS for Freshwater Management.
<i>Meridian Energy Limited</i>	1014	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Introduction of new water quality standards in objective and definitions would create further subjectivity and impracticality.
<i>Central Otago Environmental Society</i>	1028	<i>Support submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Requirement for clear, detailed definitions.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Not all waterways need to be enhanced.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			

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<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 15</i>		<ul style="list-style-type: none"> • Adds restrictions where there is no environmental issues. • Unfair and inconsistent with RMA.
<i>TrustPower</i>	1059	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn. • Reasons in original submission.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • 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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Maintaining or enhancing catchments that have excellent or very good water quality is supported.
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 15</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Fish and Game (Central South Island)	273	Amend	Amend "good" to "at least good" water quality. Or such other relief that ensures this objective appropriately protects existing high water quality bodies, and improves water quality where it is degraded.	<ul style="list-style-type: none"> • Concerned about the term "good". This may imply degradation of water quality which is 'excellent' in many places. • Risk that this objective will be used as a target, rather than the bottom line. • Benchmarks such as this are needed in plans.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 15</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 15</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 273 ref. 15</i>		<ul style="list-style-type: none"> • Extending beyond 'good' and 'noticeable' to effects unrealistic, unachievable and generic. • Inconsistent with RMA s5.
<i>TrustPower</i>	1059	<i>Oppose submission 273 ref. 15</i>		<ul style="list-style-type: none"> • Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn. • Reasons in original submission.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 273 ref. 15</i>		<ul style="list-style-type: none"> • Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 15</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Sue Coutts</i>	281	Amend	The wording in 7.A.1 should read as follows: "To maintain and enhance the quality of water in Otago's water bodies so that their good quality supports natural and human use values."	<ul style="list-style-type: none"> • Recognise importance of natural and human use values. • Settling for 'good' water quality takes us backwards, so must maintain existing quality. • Prefer 7.A.1, to have clear, measurable and enforceable standards for measuring water quality and intention to maintain and enhance. • Original 7.5.1 was more powerful and dynamic, reflecting some water bodies are pristine, others very degraded. • Shift towards overall quality of freshwater in a region at the expense of water bodies of above average quality is not supported. • Maintain and ideally improve the quality of all our water bodies from their current benchmark.
<i>Contact Energy Limited</i>	284	Amend	Amend Objective 7.A.1 to read as follows: "Otago's fresh water bodies to have good quality water over the course of a year, when at mean levels and flows".	<ul style="list-style-type: none"> • Same standards apply to most Otago water bodies. • Relationship between objective and natural and human use values is lost. • No clear statement on how to apply objective for water with naturally elevated sediment, or during abnormal flows. • May be desired to reduce water quality for short periods for other objectives, e.g., working to mitigate flood risk. • Need to amend objective because explanation deleted.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 284 ref. 15</i>		<ul style="list-style-type: none"> • Water bodies should have good water quality all year. • Plan provides for short term periods of sedimentation due to elevated flow.
<i>Meridian Energy Limited</i>	1014	<i>Support in part submission 284</i>		<ul style="list-style-type: none"> • Greater direction needed as to the circumstances where water quality standards should be met.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Fish and Game (Otago)	287	<i>ref. 15</i> Amend	Amend "good" to "at least good" water quality; OR Such other relief that ensures this objective appropriately protects existing high water quality bodies, and improves water quality where it is degraded.	<ul style="list-style-type: none"> Concerned about the term "good". This may imply degradation of water quality which is 'excellent' in many places. Risk that this objective will be used as a target, rather than the bottom line. Benchmarks such as this are needed in plans.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 15</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality. Affected by a variety of activities, not just agricultural uses. Imposes unnecessary constraints on farming practices.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 15</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 15</i>		<ul style="list-style-type: none"> Extending beyond 'good' and 'noticeable' to effects unrealistic, unachievable and generic. Inconsistent with RMA s5.
<i>TrustPower</i>	1059	<i>Oppose submission 287 ref. 15</i>		<ul style="list-style-type: none"> Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn. Reasons in original submission.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 287 ref. 15</i>		<ul style="list-style-type: none"> Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 15</i>		<ul style="list-style-type: none"> Overly restrictive and disproportionate. Does not take into account economic considerations.
The Director-General of Conservation	306	Amend	That 7.A.1 be amended as follows, or to like effect: As these are threatened by inappropriate discharges, to have good quality water in Otago's water bodies and contiguous coastal waters that support natural and human use values.	<ul style="list-style-type: none"> In absence of issues, best practice is for objectives to contain reference to the issues. To give effect to the NZCPS 2010.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306</i>		<ul style="list-style-type: none"> No evidence from environmental impacts from agricultural activities. Changes are vague, unclear and open-ended.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 15</i>		
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Reference to inappropriate discharges does not explain or justify the suggested objective wording. • An objective focusing on water quality in the coastal marine area is not appropriate for a Plan on Otago's freshwater resources.
<i>Hopefield Investments Ltd</i>	<i>1019</i>	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	<i>1029</i>	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • No reason given.
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
<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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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>Moutere Station Limited</i>	<i>1052</i>	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
<i>Hawkdun Station</i>	<i>1053</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
<i>TrustPower</i>	<i>1059</i>	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn. • Reasons in original submission.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 15</i>		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Amend	Amendments and/or additions to the Objectives are required to give effect to the NPS and RPS to achieve the purpose of the Act. In particular, acknowledgement is required that discharges to water support the community's social and economic wellbeing.	<ul style="list-style-type: none"> • Narrow focus, no recognition of other factors that must be balanced with natural and human use values. Implies any adverse effect on natural and human use values unacceptable, which is inconsistent with Act, NPS, RPS. • 'Good water' quality arbitrary, no account of regional variation, fails to implement NPS, RPS. • S 32 assessment inadequate.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 308 ref. 15</i>		<ul style="list-style-type: none"> • Gives effect to both the RPS and NPSFW.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 15</i>		<ul style="list-style-type: none"> • No reason given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 15</i>		<ul style="list-style-type: none"> • Appropriate focus on considerations. • S32 inadequate.
<i>TrustPower</i>	1059	<i>Support submission 308 ref. 15</i>		<ul style="list-style-type: none"> • Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn. • Reasons in original submission.
<i>Alliance Group Limited</i>	1060	<i>Support submission 308 ref. 15</i>		<ul style="list-style-type: none"> • Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 15</i>		<ul style="list-style-type: none"> • Seek that the submission be allowed and the Plan Change amended as per the submission.
Central Otago District Council & Clutha District Council	309	Amend	Amendments and/or additions to the Objectives are required to give effect to the NPS and RPS to achieve the purpose of the Act. In particular, acknowledgement is required that discharges to water support the community's social and economic wellbeing.	<ul style="list-style-type: none"> • Narrow focus, no recognition of other factors that must be balanced with natural and human use values. Implies any adverse effect on natural and human use values unacceptable, which is inconsistent with Act, NPS, RPS. • 'Good water' quality arbitrary, no account of regional variation, fails to implement NPS, RPS. • Section 32 assessment inadequate.
<i>Contact Energy Limited</i>	1013	<i>Support submission 309 ref. 15</i>		<ul style="list-style-type: none"> • Reasons set out in submission.
<i>Dunedin City Council</i>	1025	<i>Support submission 309</i>		<ul style="list-style-type: none"> • No reasons given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 15</i>		
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 15</i>		• <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 15</i>		• <i>No reason given.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 15</i>		• <i>Agree objectives and policies need to balance variety of values associated with water.</i> • <i>Support conclusion that section 32 inadequate and that plan change should be consistent with RMA, NPSFW and RPS.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 15</i>		• <i>Appropriate focus on considerations.</i> • <i>S32 inadequate.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 15</i>		• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 15</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>Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</i>
Glen Dene Limited	310	Amend	Amend objective or add additional objectives that provide for other relevant matters under the Act, such as the national values of freshwater listed in the NPS.	<ul style="list-style-type: none"> • Objective places natural and human use values above all others (not consistent with section 5 which requires balance). • Implication is that any adverse effects on natural or human use values will be unacceptable. • Concept of 'good water quality' throughout region is arbitrary and does not reflect variation.
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. 15</i>		• <i>Appropriate focus on considerations.</i> • <i>S32 inadequate.</i> • <i>Inconsistent with RMA s5.</i>
<i>Contact Energy Limited</i>	1013	<i>Support submission 310 ref. 15</i>		• <i>Supports focus on the values of freshwater listed in the NPS for Freshwater Management.</i> • <i>Contribute to achieving the purpose of the Act.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 312</i>		• <i>Appropriate to provide for capacity otherwise rule too restrictive.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 15</i>		
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 322 ref. 15</i>		<ul style="list-style-type: none"> • Alignment with NPS and RMA ensures consistency, predictability and co-operation between regions and supports better decision-making.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 323 ref. 15</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>TrustPower</i>	1059	<i>Support submission 323 ref. 15</i>		<ul style="list-style-type: none"> • Objective 7.5.1 should be retained, and Objective 7.A.1, withdrawn. • Reasons in original submission.
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 15</i>		<ul style="list-style-type: none"> • Alliance seeks that original Policy 7.5.1 is retained and proposed Objective 7.A.1 is withdrawn for reasons in its original submission.
<i>City Forests</i>	1071	<i>Support submission 323 ref. 15</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 15</i>		<ul style="list-style-type: none"> • 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.

16 Objective 7.A.2 - Maintain and enhance

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Martin Ford	5	Support	Maintain and then improve water quality.	<ul style="list-style-type: none"> • Clutha River, Puerua River and Karoro Creek should be pristine to support Molyneux Bay.
Mosgiel Taieri Community Board	46	Support	Support the general ambitions of the plan change, that is good water quality.	<ul style="list-style-type: none"> • No reasons given.
<i>TrustPower</i>	1059	<i>Oppose submission 46 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 46 ref. 16</i>		<ul style="list-style-type: none"> • Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
Alastair Rutherford	105	Support	Keep as proposed.	<ul style="list-style-type: none"> • Best to have individuals and communities manage the effects.
The Cow Farm Limited	133	Amend	Change the objective to have measurable and quantifiable meaning for "good quality water". Remove the word "where necessary" or provide some measurable definition of what "where necessary" means.	<ul style="list-style-type: none"> • "necessary" creates uncertainty - ORC could decide at any time, that water requires improvement, legislative framework could keep shifting.
New Zealand Pork Industry Board	145	Oppose	Delete Objective 7.A.2.	<ul style="list-style-type: none"> • Term 'good' too subjective, unless directly referenced to parameters in Table 15.1 - Schedule 15.
<i>Otago Fish and Game Council</i>	1027	<i>Support in part submission 145 ref. 16</i>		<ul style="list-style-type: none"> • Water quality in upper catchments could degrade to something less than what they currently are.
<i>TrustPower</i>	1059	<i>Support submission 145 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 145</i>		<ul style="list-style-type: none"> • Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 16</i>		
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 145 ref. 16</i>		<ul style="list-style-type: none"> • Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.
Dairy NZ Limited	146	Oppose	Delete the objective.	<ul style="list-style-type: none"> • Provides no additional guidance than RMA and RPS. • No guidance to "where necessary".
<i>The Director-General of Conservation</i>	1011	<i>Oppose submission 146 ref. 16</i>		<ul style="list-style-type: none"> • Contrary to the RMA.
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 146 ref. 16</i>		<ul style="list-style-type: none"> • Support the need for the objective to include numerical targets for water quality and the link to Schedule 15.
<i>TrustPower</i>	1059	<i>Support submission 146 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 16</i>		<ul style="list-style-type: none"> • Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 146 ref. 16</i>		<ul style="list-style-type: none"> • Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 16</i>		<ul style="list-style-type: none"> • Clarification required to references of 'good water quality' and 'natural and human use values'.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 16</i>		<ul style="list-style-type: none"> • Oppose any aspects of the submission that are contrary to the further submitter's primary submission.
Pioneer Generation	147	Oppose	<p>That Objective 7.5.1 of the operative version of Section 7 (Water Quality) of the Regional Plan be retained and that Objective 7.A.2 be deleted. Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment set out above.</p> <p>That the term 'good quality water' be deleted from Section 7 (Water Quality).</p>	<ul style="list-style-type: none"> • "Good water quality" not referred to or defined in NPS, RPS, or RMA, inappropriately subjective and leaves objectives and policies open to divergent interpretations • Outstanding water bodies not provided for.
<i>TrustPower</i>	1059	<i>Support submission 147 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 147 ref. 16</i>		<ul style="list-style-type: none"> • Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 147 ref. 16</i>		<ul style="list-style-type: none"> • Retain objectives that provide for the maintenance and enhancement of water quality. • Amending these objective to provide for the protection of outstanding freshwater bodies is supported.
Alliance Group Limited	187	Oppose	Remove proposed objective.	<ul style="list-style-type: none"> • Not effective or efficient for objectives to seek to achieve characteristics across Otago that are only plausible for a limited number of waterways when rainfall events have not recently occurred.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 16</i>		<ul style="list-style-type: none"> • <i>Agrees objectives and policies should recognise positive effects of discharges and balance different values.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 187 ref. 16</i>		<i>Retain objectives that provide for the maintenance and enhancement of the characteristics of good water quality.</i>
<i>Dairy Holdings Limited</i>	195	<i>Oppose</i>	<p>Delete the objective.</p> <p>In the alternative there is a need to better define, and link the objective to, the values in Schedule 15.</p>	<ul style="list-style-type: none"> • <i>Perfunctory, repeats RMA S 30(1)(c)(ii), and the RPS, doesn't give effect to them.</i> • <i>Little guidance given to meaning of "where necessary".</i> • <i>Objective not clear, provides little useful direction to implement the plan change.</i>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 16</i>		<ul style="list-style-type: none"> • <i>Submission outlines concern of further submitter.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 16</i>		<ul style="list-style-type: none"> • <i>Support in part, particularly regarding wider effect of the plan change.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 16</i>		<ul style="list-style-type: none"> • <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i> • <i>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	197	<i>Amend</i>	That Objective 7.A.2 be redrafted as follows: "To maintain the characteristics of good quality water in Otago's freshwater bodies, and enhance water quality where it is degraded."	<ul style="list-style-type: none"> • <i>No clear link between objective and table 15.1.</i> • <i>Should actively promote enhancement of degraded freshwater bodies.</i>
<i>Otago Water Resource Users</i>	1056	<i>Oppose</i>		<ul style="list-style-type: none"> • <i>Opposes reference to "freshwater body": the proposed plan change should</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Group		submission 197 ref. 16		protect public water bodies.
TrustPower	1059	Oppose submission 197 ref. 16		Objective 7.A.2 should be withdrawn for the reason set out in original submission.
Alliance Group Limited	1060	Oppose submission 197 ref. 16		• Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
Glenshee Station Limited	1062	Oppose submission 197 ref. 16		• 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. 16		• Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
NZ Transport Agency	203	Amend	Amend Objective 7.A.2 to make it about enhancing water quality.	• Partially overlaps 7.A.1, unnecessary as both requiring the same outcome.
Dunedin City Council	1025	Support submission 203 ref. 16		• No reasons given.
Trustpower Limited	206	Oppose	Remove this objective from the Plan Change.	• Not most appropriate way to achieve purpose of RMA as required by S32. • No improvement to existing wording [of 7.5.1] given arbitrary nature of "good quality water".
Alliance Group Limited	1060	Support submission 206 ref. 16		• Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Oppose submission 206 ref. 16		• Retain objectives that provide for the maintenance and enhancement of the characteristics of good water quality.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 206 ref. 16		• Clarification required to references of 'good quality water' and 'natural and human use values'.
Dunedin City Council	211	Amend	Objective 7.A.2 be amended to focus it on enhancing water quality.	• Partially overlaps with Objective 7.A.1 as both require maintenance of good water quality.
Contact Energy Limited	1013	Support submission 211 ref. 16		• Alternative to Contact's primary submission. • Reasons stated in the submission.
Strath Taieri Community Board	1029	Support submission 211 ref. 16		• No reason given.
Clutha District Council	1050	Support submission 211 ref. 16		• Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
TrustPower	1059	Oppose submission 211 ref. 16		Objective 7.A.2 should be withdrawn for the reason set out in original submission.
Alliance Group Limited	1060	Oppose submission 211 ref. 16		• Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms	1074	Support in part submission 211		• Clarification required to references of 'good quality water' and 'natural and human use values'.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Partnership</i>		<i>ref. 16</i>		<ul style="list-style-type: none"> • <i>Greater flexibility should be introduced (particularly in relation to the timeframes).</i>
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> • No reason given.
Fulton Hogan Limited	222	Oppose	Delete the objective.	<ul style="list-style-type: none"> • Does not provide any additional guidance than already provided in RMA. • "where necessary" introduces uncertainty.
Holcim (New Zealand) Limited	224			
<i>TrustPower</i>	<i>1059</i>	<i>Support submissions 222 and 224 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submissions 222 and 224 ref. 16</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.</i>
Fonterra Co-operative Group Limited	241	Oppose	Delete the objective.	<ul style="list-style-type: none"> • Provides no addition guidance than RMA and RPS • No guidance to "where necessary".
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 241 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 241 ref. 16</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose submission 241 ref. 16</i>		<ul style="list-style-type: none"> • <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 241 ref. 16</i>		<ul style="list-style-type: none"> • <i>Consistent with relief sought by further submitter.</i> • <i>Clarification required to references of 'good water quality' and 'natural and human use values'.</i>
Ravensdown Fertiliser Co-operative Ltd	248	Support	Supports in principle the intent of Objective 7.A.2, subject to concerns regarding better defining the values in Schedule 15.	<ul style="list-style-type: none"> • Need to define what is meant by 'good water quality' as not defined in water plan, NPSFW or RMA. • Need to address what supporting 'natural and human use values' means.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submissions 248 and 252 ref. 16</i>		<ul style="list-style-type: none"> • <i>Schedule 15 values are not well defined.</i> • <i>Unclear how values will be determined consistently.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & Mrs RR Van Vught</i>	<i>1047</i>			
<i>Mainland Poultry Limited</i>	<i>1048</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Calder Stewart Industries Limited	1049			
Clutha District Council	1050			
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
TrustPower	1059	Oppose submission 248 ref. 16		Objective 7.A.2 should be withdrawn for the reason set out in original submission.
Alliance Group Limited	1060	Oppose submission 248 ref. 16		• Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
Waitaki Irrigators Collective Limited	257	Amend	Change wording of objective.	<ul style="list-style-type: none"> • Unclear what "where necessary" means. • Who determines if water body needs enhancing? • Is there to be an objective measure or standard used?
Ballance Agri-Nutrients Ltd	262	Support	Supports in principle the intent of Objective 7.A.2, [but] subject to concerns regarding better defining the values in Schedule 15.	<ul style="list-style-type: none"> • Need to define what is meant by 'good water quality' as not defined in water plan, NPSFW or RMA. • Need to address what supporting 'natural and human use values' means.
Mr RJ Borst	1034	Support submission 262 ref. 16		<ul style="list-style-type: none"> • Schedule 15 values are not well defined. • Unclear how values will be determined consistently.
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 262 ref. 16		Objective 7.A.2 should be withdrawn for the reason set out in original submission.
Alliance Group Limited	1060	Oppose submission 262 ref. 16		• Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
Environmental Defence Society	267	Amend	Amend the objectives so that there is an explanation as to where in the plan 'good quality' is defined in a measurable way, and what the intent of the objective is.	<ul style="list-style-type: none"> • Objective too vague as to what is "good quality". • What values is good water quality intended to support. • Objectives should be more specific, measurable, realistic and time-bound.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>Add an explanation of 'natural and human use values' or define what is meant by these terms in the plan. Natural use values should encompass intrinsic values set out in the NPSFW.</p> <p>Delete the reference to "where necessary" so that the objective relates to maintaining or enhancing good water quality.</p> <p>Add a realistic timeframe for all water bodies to have 'good quality water' that supports natural values.</p>	
<i>Horticulture New Zealand</i>	1032	<i>Oppose in part submission 267 ref. 16</i>		<ul style="list-style-type: none"> • Objectives should be clear.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 267 ref. 16</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 267 ref. 16</i>		<ul style="list-style-type: none"> • Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 in part submission 267 ref. 16</i>		<ul style="list-style-type: none"> • Clarity assists plan usability, appropriate focus on considerations. • S32 inadequate. • Inconsistent with RMA s5.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 16</i>		<ul style="list-style-type: none"> • Oppose submission in that it supports plan change and use of prohibited activity status.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support submission 267 ref. 16</i>		<ul style="list-style-type: none"> • Clarification required to references of "good quality water" and "natural and human use values", particularly that this includes farming and related rural activities.
Colin Scurr	268	Amend	The Objective needs to recognise the variability of water quality and	<ul style="list-style-type: none"> • Concept of 'good water quality' is arbitrary and unclear.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			provide for integrated management of resources.	
Horticulture New Zealand	269	Amend	Delete and replace it with Objectives based on the following values - Domestic Food Production and Processing. - Export Food Production and Processing. - Community Social and Economic Wellbeing. - Recognition of lawfully established existing investment. - Equitable treatment for rural and urban communities in managing water quality. And add complementary policies, rules and methods that give effect to the new Objectives.	<ul style="list-style-type: none"> Provides lack of certainty. No guidance on when enhancement will be 'necessary'.
Contact Energy Limited	1013	Oppose submission 269 ref. 16		<ul style="list-style-type: none"> Relief sought as uncertain as notified objective. The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.
TrustPower	1059	Support submission 269 ref. 16		Objective 7.A.2 should be withdrawn for the reason set out in original submission.
Alliance Group Limited	1060	Support submission 269 ref. 16		Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
Etrick Fruitgrowers Association Inc	1067	Support submission 269 ref. 16		<ul style="list-style-type: none"> Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities. Lack of definition of objective. Recognise values as set out in Horticulture NZ's submission.
Forest and Bird	271	Amend	Amend to read: "7.A.2 To maintain or enhance waters including groundwater with very good or excellent water quality water in Otago's water bodies and contiguous coastal waters, and enhance water quality in water bodies, including groundwaters with less than good water quality."	<ul style="list-style-type: none"> Current objective does not aim to retain existing very good to excellent water quality. Need to ensure that all waterways with less than good water quality will be enhanced.
The Director-General of Conservation	1011	Support submission 271 ref. 16		"Goal" of the plan change is identified.
Craiglea Limited	1012	Oppose submission 271 ref. 16		<ul style="list-style-type: none"> Not all waterways need to be enhanced. Background data required before any agricultural activities are restricted.
Central Otago Environmental Society	1028	Support submission 271 ref. 16		<ul style="list-style-type: none"> Essential to distinguish between upper and lower catchments. Proactive management required to improve water quality where necessary.
Mr RJ Borst	1034	Oppose submission 271 ref. 16		<ul style="list-style-type: none"> Not all waterways need to be enhanced.
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			

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<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 271 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 16</i>		<i>• Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 16</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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 271 ref. 16</i>		<i>• Maintaining or enhancing catchments that have excellent or very good water quality is supported.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 16</i>		<i>• Overly restrictive and disproportionate. • Does not take into account economic considerations.</i>
Fish and Game (Central South Island)	273	Amend	Amend "good" to "at least good" water quality. Or such other relief that ensures this objective appropriately protects existing high water quality bodies, and improves water quality where it is degraded.	<i>• Concerned about the term "good". This may imply degradation of water quality which is 'excellent' in many places. • Risk that this policy will be used as a target, rather than the bottom line. • Benchmarks such as this are needed in plans.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 16</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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
<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 273 ref. 16</i>		<ul style="list-style-type: none"> • <i>Extending beyond 'good' and 'noticeable' to effects unrealistic, unachievable and generic.</i> • <i>Inconsistent with RMA s5.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 273 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 273 ref. 16</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 16</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Sue Couatts	281	Amend	Not support an approach which would only enhance water quality where "necessary".	<ul style="list-style-type: none"> • What is the threshold for determining when enhancement becomes "necessary"? • Burden of proof is on community to demonstrate that values from their perspective outweigh economic gain from having water degraded.
Contact Energy Limited	284	Oppose	Delete Objective 7.A.2.	<ul style="list-style-type: none"> • Duplicates 7.A.1. • Not clear when it might be necessary to enhance water quality. • Not clear if higher water quality than 'good' is sought and, if so, to what standard and in what circumstances. • Relationship between objective and natural and human use values is lost. • Need to amend objective because explanation deleted.
<i>TrustPower</i>	1059	<i>Support submission 284 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 284 ref. 16</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.</i>
Fish and Game (Otago)	287	Amend	Amend "good" to "at least good" water quality; OR Such other relief that ensures this objective appropriately protects existing high water quality bodies, and improves water quality where it is degraded.	<ul style="list-style-type: none"> • Concerned about the term "good". This may imply degradation of water quality which is 'excellent' in many places. • Risk that this policy will be used as a target, rather than the bottom line. • Benchmarks such as this are needed in plans.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 287 ref. 16</i>		<ul style="list-style-type: none"> • <i>Gives effect to the RMA.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 16</i>		<ul style="list-style-type: none"> • <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>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 16</i>		<ul style="list-style-type: none"> • <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. 16</i>		<ul style="list-style-type: none"> • <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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr DC Greer</i>	1039			
<i>Mr RG & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 16</i>		<ul style="list-style-type: none"> • <i>Extending beyond 'good' and 'noticeable' to effects unrealistic, unachievable and generic.</i> • <i>Inconsistent with RMA s5.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 287 ref. 16</i>		<i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 287 ref. 16</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 16</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
The Director-General of Conservation	306	Amend	That 7.A.2 be amended as follows, or to like effect: To maintain good quality water in Otago's water bodies and contiguous coastal waters, and enhance water quality where necessary, in particular where a decline in water quality has been recorded and recognised.	<ul style="list-style-type: none"> • In the absence of issues, best practice is for objectives to contain reference to the issue(s). • To give effect to the NZCPS 2010.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • <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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr DC Greer</i>	1039			
<i>Mr RG & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • There may be a decline in water quality from land use that is minor and is not required to be addressed.
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • Objective 7.A.2 should be withdrawn for the reason set out in original submission.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 16</i>		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • <i>Seek the submission be disallowed.</i>
Clutha District Council	308	Amend	Amendments and/or additions to the Objectives are required to give effect to the NPS and RPS to achieve the purpose of the Act. In particular, acknowledgement is required that discharges to water support the community's social and economic wellbeing.	<ul style="list-style-type: none"> • Narrow focus, no recognition of other factors that must be balanced with natural and human use values. Implies any adverse effect on natural and human use values unacceptable, which is inconsistent with Act, NPS and RPS. • 'Good water' quality arbitrary, no account of regional variation, fails to implement NPS and RPS. • S 32 assessment inadequate.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 308 ref. 16</i>		<ul style="list-style-type: none"> • <i>Gives effect to both the RPS and NPSFW.</i>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 16</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 16</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 16</i>		<ul style="list-style-type: none"> • <i>Appropriate focus on considerations.</i> • <i>S32 inadequate.</i>
<i>TrustPower</i>	1059	<i>Support submission 308 ref. 16</i>		<ul style="list-style-type: none"> • <i>Objective 7.A.2 should be withdrawn for the reason set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 308 ref. 16</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that proposed Objective 7.A.2 is withdrawn for reasons in its original submission.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 16</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Amend	Amendments and/or additions to the Objectives are required to give effect to the NPS and RPS to achieve the purpose of the Act. In particular, acknowledgement is required that discharges to water support the community's social and economic wellbeing.	<ul style="list-style-type: none"> • Narrow focus, no recognition of other factors that must be balanced with natural and human use values. Implies any adverse effect on natural and human use values unacceptable, which is inconsistent with Act, NPS and RPS. • 'Good water' quality arbitrary, no account of regional variation, fails to implement NPS and RPS. • Section 32 assessment inadequate.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 16</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 16</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 309 ref. 16</i>		<ul style="list-style-type: none"> • <i>Consideration of social and economic wellbeing is supported.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 16</i>		<ul style="list-style-type: none"> • <i>Agree objectives and policies need to balance variety of values associated with water.</i> • <i>Support conclusion that section 32 inadequate and that plan change should be consistent with RMA, NPSFW and RPS.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 16</i>		<ul style="list-style-type: none"> • <i>Appropriate focus on considerations.</i> • <i>S32 inadequate.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 309 ref. 16</i>		<i>the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 16</i>		<ul style="list-style-type: none"> • 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 consideration
Glen Dene Limited	310	Amend	Objective needs to recognise variability of water quality and provide for integrated management of resources.	<ul style="list-style-type: none"> • Concept of 'good water quality' is arbitrary and unclear.
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. 16</i>		<ul style="list-style-type: none"> • Appropriate focus on considerations. • S32 inadequate. • Inconsistent with RMA s5.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 16</i>		<ul style="list-style-type: none"> • 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.

17 Objective 7.A.3 - Cumulative effects

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alastair Rutherford	105	Support	Keep as proposed.	<ul style="list-style-type: none"> • Best to have individuals and communities manage the effects.
Mt Aspiring Station	127	Support	Support objective.	<ul style="list-style-type: none"> • Positive statement and the approach needed to achieve goals.
The Cow Farm Limited	133	Oppose	Delete this objective.	<ul style="list-style-type: none"> • ORC responsible for managing the effects of activities, not the community. • Vague and weak with no clear purpose.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 133 ref. 17</i>		<ul style="list-style-type: none"> • Required to ensure that the discharge of contaminants directly or indirectly to water is reduced.
Dairy NZ Limited	146	Oppose	Delete the objective.	<ul style="list-style-type: none"> • Is uncertain, not measurable, and doesn't provide guidance for subsequent policy, implementation methods, or consenting.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> Does not give effect to RPS and provides no addition guidance than RMA and RPS. Does not clearly specify outcomes sought.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 17</i>		<ul style="list-style-type: none"> Enable discharges with no more than minor effects. Should be greater objectivity and direction in policy wording.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 146 ref. 17</i>		<ul style="list-style-type: none"> Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 17</i>		<ul style="list-style-type: none"> Oppose any aspects of the submission that are contrary to the further submitter's primary submission.
Dairy Holdings Limited	195	Oppose	<p>Delete the objective.</p> <p>In the alternative there is a need to better define, and link the objective to, the values in Schedule 15 - and to refocus the objective so that it is limited to the management of effects.</p>	<ul style="list-style-type: none"> Perfunctory, repeats RMA S 30(1)(c)(ii), and the RPS, doesn't give effect to them. Unclear meaning of "recognise and manage". Arguably ultra vires, RMA about appropriate extent of avoiding, remedying, or mitigating adverse effects. Imposes a positive obligation on people per se, contrary to general approach of RMA. Objective not clear, provides little useful direction to implement the plan change.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 17</i>		<ul style="list-style-type: none"> Submission outlines concern of further submitter.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 17</i>		<ul style="list-style-type: none"> Support in part, particularly regarding wider effect of the plan change. 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 17</i>		<ul style="list-style-type: none"> Clarification required to references of 'good quality water' and 'natural and human use values'. Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	That Objective 7.A.3 be retained as currently drafted.	<ul style="list-style-type: none"> Support objective.
<i>Meridian Energy Limited</i>	1014	<i>Oppose submission 197 ref. 17</i>		<ul style="list-style-type: none"> Objective 7.A.3 is not an appropriate statement of intent and does not address any additional matters to those set out in Objectives 7.A.1 and 7.A.2.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 17</i>		<ul style="list-style-type: none"> 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. 17</i>		<ul style="list-style-type: none"> Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Trustpower Limited	206	Support	Adopt the proposed objective.	<ul style="list-style-type: none"> ORC's involvement of community in managing water quality issues is supported.
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 17</i>		<ul style="list-style-type: none"> Supports the involvement of the community in managing water quality issues.
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> No reason given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Kawarau Station Limited	232	Amend	Amend to include the requirement to have regard to cultural, social and economical consequences.	<ul style="list-style-type: none"> Community economic/social outcomes as required by RMA have not been considered.
Fonterra Co-operative Group Limited	241	Oppose	Delete the objective.	<ul style="list-style-type: none"> Is uncertain, not measurable, and doesn't provide guidance for subsequent policy, implementation methods, or consenting. Does not give effect to RPS and provides no addition guidance than RMA and RPS. Does not clearly specify outcomes sought.
Forest and Bird NZ	1007	Oppose submission 241 ref. 17		<ul style="list-style-type: none"> An objective recognising need to manage cumulative effects is important for addressing water quality.
Environmental Defence Society	1055	Oppose submission 241 ref. 17		<ul style="list-style-type: none"> An objective recognising need to manage cumulative effects is important for addressing water quality.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Oppose submission 241 ref. 17		<ul style="list-style-type: none"> Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 241 ref. 17		<ul style="list-style-type: none"> Consistent with relief sought by further submitter. Clarification required to references of 'good water quality' and 'natural and human use values'.
Ravensdown Fertiliser Co-operative Ltd	248	Support	Supports in principle the intent of Objective 7.A.3, subject to concerns regarding better defining the values in Schedule 15.	<ul style="list-style-type: none"> Need to define what is meant by 'good water quality' as not defined in water plan, NPSFW, or RMA. Need to address what supporting 'natural and human use values' means.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
Ballance Agri-Nutrients Ltd	262			
Mr RJ Borst	1034	Support submissions 248, 252 & 262 ref. 17		<ul style="list-style-type: none"> Schedule 15 values are not well defined. Unclear how values will be determined consistently.
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			
Colin Scurr	268	Amend	Delete "To have individuals and communities".	<ul style="list-style-type: none"> Purports to transfer responsibilities of regional councils under Section 30

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				RMA to community. <ul style="list-style-type: none"> • Approach creates uncertainty about what 'effects' require management and how it should be done. • Fails to adopt an integrated approach to land-use and water planning as required under RMA.
Horticulture New Zealand	269	Oppose	Delete Objective 7.A.3.	<ul style="list-style-type: none"> • Laudable intent, but is unclear and uncertain as to how it will be measured.
<i>Etrick Fruitgrowers Association Inc</i>	1067	Support submission 269 ref. 17		<ul style="list-style-type: none"> • Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.
Fish and Game (Central South Island)	273	Amend	This test should be written as "avoid", as this is what the science behind the plan limits is aiming to achieve - the avoidance of harm to waterways and the aquatic life within them.	<ul style="list-style-type: none"> • To "manage" not high enough test, when rules state all discharges over a certain level are to be prohibited.
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	Oppose submission 273 ref. 17		<ul style="list-style-type: none"> • Change requested is inappropriate and contrary to the RMA provisions.
<i>Meridian Energy Limited</i>	1014	Oppose submission 273 ref. 17		<ul style="list-style-type: none"> • "Avoiding effects" should not have the priority over "remediation" or "mitigation" of effects. • Remediation or mitigation of adverse effects may be the most appropriate option in many circumstances.
<i>Dunedin City Council</i>	1025	Oppose submission 273 ref. 17		<ul style="list-style-type: none"> • Inconsistent with Section 5 of the Act. • Will have significant social, economic and cultural effects.
<i>Horticulture New Zealand</i>	1032	Oppose submission 273 ref. 17		<ul style="list-style-type: none"> • Inconsistent with RMA.
<i>Mr RJ Borst</i>	1034	Oppose submission 273 ref. 17		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Unnecessary constraints on farming practices.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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	Oppose submission 273		Effects will not always be avoidable and this is contemplated by the RMA.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 17</i>		
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 273 ref. 17</i>		<ul style="list-style-type: none"> • Too strict, would have considerable impact to farming activities. • Contrary to RMA. • Lack of clarity in what effects require management and how, not integrated approach.
<i>The NZ Transport Agency</i>	1073	<i>Oppose submission 273 ref. 17</i>		<ul style="list-style-type: none"> • Amending the objective to focus on 'avoiding' discharges will have significant social, economic and cultural effects. RMA section 5 requires a balance and an opportunity to consider if effects can be avoided, remedied or mitigated. • Seek that the submission be disallowed.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 17</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Federated Farmers of New Zealand	278	Support	Adopt the objective and ensure that policies and rules give effect to the objective throughout the plan change.	<ul style="list-style-type: none"> • Supports, but notes plan change doesn't encourage community or catchment-based approaches to improving water quality.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 17</i>		<ul style="list-style-type: none"> • Practical and workable alternatives, solutions and suggestions.
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 17</i>		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 17</i>		<ul style="list-style-type: none"> • No reason given.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 17</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 17</i>		<ul style="list-style-type: none"> • Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use. • Effects-based approach should allow for discharges that exceed Schedule 16 limits.
Sue Coutts	281	Amend	Do not support the burden, for recognising and managing the effects of activities on water quality, falling on individuals and communities alone. Iwi, businesses, government and other organisations need to be included in this list.	<ul style="list-style-type: none"> • Everybody has a duty to maintain/enhance water quality. • Reflect that a range of groups make decisions that impact on water quality.
Fish and Game (Otago)	287	Amend	This test should be written as "avoid".	<ul style="list-style-type: none"> • To "manage" not high enough test, when rules state all discharges over a certain level are to be prohibited. • What science behind limits is aiming to achieve - avoidance of harm to waterways and aquatic life within them.
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 287 ref. 17</i>		<ul style="list-style-type: none"> • Change requested is inappropriate and contrary to the RMA provisions.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 17</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 287 ref. 17</i>		<ul style="list-style-type: none"> • A general objective of avoiding all effects is impractical and inconsistent with the purpose of the Act.
<i>Dunedin City Council</i>	1025	<i>Oppose</i>		<ul style="list-style-type: none"> • Inconsistent with Section 5 of the Act.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 287 ref. 17</i>		<ul style="list-style-type: none"> • Will have significant social, economic and cultural effects.
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 287 ref. 17</i>		<ul style="list-style-type: none"> • For reasons given by submitter.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 17</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Unnecessary constraints on farming practices.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 17</i>		<ul style="list-style-type: none"> • Too strict, would have considerable impact to farming activities. • Contrary to RMA. • Lack of clarity in what effects require management and how, not integrated approach.
<i>The NZ Transport Agency</i>	1073	<i>Oppose submission 287 ref. 17</i>		<ul style="list-style-type: none"> • Amending the objective to focus on 'avoiding' discharges will have significant social, economic and cultural effects. RMA section 5 requires a balance and an opportunity to consider if effects can be avoided, remedied or mitigated. • Seek that the submission be disallowed.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 17</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Clutha District Council</i>	308	<i>Amend</i>	The objective should be deleted or amended to reflect the ORC's role in managing activities under section 30 of the Act.	<ul style="list-style-type: none"> • Transfers ORC responsibilities under RMA section 30 to individuals and the community. • What 'effects' require management and how is uncertain. • If individuals and communities solely responsible, will lead to different approaches and acceptable thresholds, and difficulty identifying who is responsible for the integrated management of land and water resources. • Individuals and communities do not have the resources and might not achieve the standards, leading to enforcement issues. • S 32 assessment inadequate.
<i>Contact Energy Limited</i>	1013	<i>Support submission 308</i>		<ul style="list-style-type: none"> • Reasons stated in the submission.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 17</i>		
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 17</i>		• <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 17</i>		• <i>No reason given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 17</i>		• <i>Lack of clarity in what effects require management and how.</i> • <i>Contrary to RMA, inappropriate transfer of responsibilities.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 17</i>		• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Amend	No decision requested.	• Transfers ORC responsibilities under RMA section 30 to individuals and the community. • What 'effects' require management and how is uncertain. • If individuals and communities solely responsible, will lead to different approaches and acceptable thresholds, and difficulty identifying who is responsible for the integrated management of land and water resources. • Individuals and communities do not have the resources and might not achieve the standards, leading to enforcement issues. • Section 32 assessment inadequate.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 17</i>		• <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 17</i>		• <i>No reason given.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 17</i>		• <i>Agree objectives and policies need to balance variety of values associated with water.</i> • <i>Support conclusion that section 32 inadequate and that plan change should be consistent with RMA, NPSFW and RPS.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 17</i>		• <i>Lack of clarity in what effects require management and how.</i> • <i>Contrary to RMA, inappropriate transfer of responsibilities.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 17</i>		• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 17</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>Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</i> • <i>Activities should only be prohibited when they have significant adverse environmental effects.</i>
Glen Dene Limited	310	Amend	Delete 'To have individuals and communities'.	• Transfers ORC responsibilities under RMA section 30 to individuals and the community. • What 'effects' require management and how is uncertain. • Not an integrated approach.
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	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	<i>Support submissions 310 – 326 ref. 17</i>		<ul style="list-style-type: none"> • Lack of clarity in what effects require management and how. • Contrary to RMA, inappropriate transfer of responsibilities, not an integrated approach.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 17</i>		<ul style="list-style-type: none"> • 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.

18 Section 7.B - Policies general

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
University of Otago, Department of Zoology	57	Amend	Acknowledge the intrinsic ecological values of the freshwater ecosystems into which the discharges enter, for example as follows: "7.B.6. Recognise the intrinsic ecological value of freshwater ecosystems and their riparian margins being discharged into."	<ul style="list-style-type: none"> • Agree with 7.B policies but they fail to acknowledge intrinsic ecological values. • Encourage fencing, riparian planting, and preventing livestock damage to waterways. • Mentioning issues in Table 15.1 (vegetation is not stripped bare) insufficient.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 57 ref. 18</i>		<ul style="list-style-type: none"> • Alliance opposes new objectives and policies that are unbalanced, or result in the Water Plan being unbalanced, and are inconsistent with the RMA definition of sustainable management.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 57 ref. 18</i>		<ul style="list-style-type: none"> • Protects habitats and wider needs of mahika kai, taoka species and other species of importance to Kai Tahu ki Otago.
New Zealand Pork Industry Board	145	Amend	Add to Glossary: "Noticeable effects - are effects that do not meet the standards of good water quality as defined in Schedule 15 Table 15.1 Characteristics of good water quality".	<ul style="list-style-type: none"> • Term "noticeable" too subjective, applied without reference to Schedule 15.
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 145 ref. 18</i>		<ul style="list-style-type: none"> • No reasons given.
Ernslaw One Ltd	149	Amend	Amendment to policies as may be required to support relief requested below for rules in Chapter 12.	<ul style="list-style-type: none"> • Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.
Mitchell & Webster Ltd	186	Support	Support the implementation of this rule.	<ul style="list-style-type: none"> • Support principle of improving water quality and maintaining waterways.
Alliance Group Limited	187	Amend	Add the following Objective (or similar): "7.B.6 Recognise that discharges to the region's waterways can	<ul style="list-style-type: none"> • Recognise and provide for positive benefits of discharges.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			give rise to enablement of industry, which has significant social and economic benefits. Limitations are appropriate insofar as they are necessary to avoid, remedy or mitigate adverse effects arising from such discharges."	
<i>Meridian Energy Limited</i>	1014	<i>Support submission 187 ref. 18</i>		• <i>Consideration of effects should include the positive benefits derived from the activities creating discharge.</i>
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 18</i>		• <i>Agrees objectives and policies should recognise positive effects of discharges and balance different values.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 187 ref. 18</i>		• <i>The discharge of industrial or trade related contaminants to water is opposed.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 187 ref. 18</i>		• <i>Support the new Section 7.B Policy in so far as it seeks to recognise and provide for the positive benefits of discharges.</i>
<i>Dairy Holdings Limited</i>	195	<i>Amend</i>	<i>Specific policies are needed to provide the necessary framework for appropriate permitted and prohibited activities.</i>	• <i>Existing framework woefully inadequate.</i> • <i>Policies not clear, provide little useful direction to implement plan change.</i>
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 18</i>		• <i>Submission outlines concern of further submitter.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 18</i>		• <i>Support in part, particularly regarding wider effect of the plan change.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 18</i>		• <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i> • <i>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Irrigation New Zealand Incorporated	202	Amend	Rewrite.	<ul style="list-style-type: none"> • Terms unclear. • Needs clarity to provide guidance and certainty.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 202 ref. 18</i>		<ul style="list-style-type: none"> • Supports general desirability of clarity. • The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.
<i>TrustPower</i>	1059	<i>Support submission 202 ref. 18</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 202 ref. 18</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 18</i>		<ul style="list-style-type: none"> • 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.
NZ Transport Agency	203	Amend	To include policies in 7.B to provide guidance to consent processing.	<ul style="list-style-type: none"> • Currently an inconsistent approach to consent guidance between rural discharges and other discharges.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 203 ref. 18</i>		<ul style="list-style-type: none"> • The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 18</i>		<ul style="list-style-type: none"> • No reasons given.
Blakely Pacific Limited	209	Amend	Amendment to policies as may be required to support relief requested below for rules in Chapter 12.	<ul style="list-style-type: none"> • Oppose policies as they support stringent permitted and prohibited activity standards.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 18</i>		<ul style="list-style-type: none"> • Clarification required to references of 'good quality water' and 'natural and human use values'.
Dunedin City Council	211	Amend	That policies are included in Chapter 7B to provide guidance for consenting processing, similar to Policies 7.7.6-7.7.11, which have been retained.	<ul style="list-style-type: none"> • Inconsistent approach to guidance between the rural discharges and the other discharges.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 18</i>		<ul style="list-style-type: none"> • No reason given.
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 18</i>		<ul style="list-style-type: none"> • Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.
<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. 18</i>		<ul style="list-style-type: none"> • 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).
North Otago Irrigation Company	260	Support	Supports 7B policies.	<ul style="list-style-type: none"> • No reason given.
<i>John Webster</i>	1063	<i>Support submission 260 ref. 18</i>		<ul style="list-style-type: none"> • Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 18</i>		<ul style="list-style-type: none"> • Support the NOIC submission in full.
Fish and Game (Otago)	287	Amend	The addition of the following policy: "7.B.6: Recognise the values of freshwater fish when water is transferred between catchments".	<ul style="list-style-type: none"> • Concerned about disease and the effect on fish genetics of mixing water.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			OR In the alternative such other relief that gives effect to Fish and Game's concerns regarding the risks of transference of water between catchments.	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 18</i>		<ul style="list-style-type: none"> • <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. 18</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 287 ref. 18</i>		<ul style="list-style-type: none"> • <i>Alliance opposes new objectives and policies that are unbalanced, or result in the Water Plan being unbalanced, and are inconsistent with the RMA definition of sustainable management.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 18</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Deer Industry New Zealand	293	Amend	The policy should reflect greater diversity in values and use to accommodate the wider descriptions and intentions under the RMA and the recently released 2011 National Water Management Policy.	<ul style="list-style-type: none"> • Believe policies contained within Section 7 are too broad in description.
The Director-General of Conservation	306	Amend	The giving of full effect to the following new policies, or to like effect: "7.B.6 Ensure monitoring is able to both identify water quality trends rapidly and effectively and that declining trends are also remedied accordingly." "7.B.7 To ensure good water quality in Otago, and make significant improvements where water quality has deteriorated."	<ul style="list-style-type: none"> • Proposal is fundamentally dependent on effective monitoring which needs to be acknowledged in a policy. • To give effect to the proposed objectives regarding the need for monitoring.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 18</i>		<ul style="list-style-type: none"> • <i>Changes are vague, unclear and open-ended.</i> • <i>Requires and enormous number of staff to monitor.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 18		<ul style="list-style-type: none"> • 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.
Strath Taieri Community Board	1029	Oppose submission 306 ref. 18		<ul style="list-style-type: none"> • No reason given.
Mr RJ Borst	1034	Oppose submission 306 ref. 18		<ul style="list-style-type: none"> • Nothing to be gained from introducing a high and costly level of consenting requirements (see submitter's other sought changes) if ORC cannot monitor and enforce provisions. • 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			
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. 18		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 18		<ul style="list-style-type: none"> • Nothing to be gained from introducing a high and costly level of consenting requirements (see submitter's other sought changes) if ORC cannot monitor and enforce provisions. • Proposed changes would require an enormous number of staff to monitor.
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 18		<ul style="list-style-type: none"> • Opposes 7.B.6: a decline in water quality may be minor and not require remedy. • Opposes 7.B.7: Policy 7.B.1 addresses this issue and refers to target dates.
Alliance Group Limited	1060	Oppose submission 306 ref. 18		<ul style="list-style-type: none"> • Alliance opposes new objectives and policies that are unbalanced, or result in the Water Plan being unbalanced, and are inconsistent with the RMA definition of sustainable management.
Glenshee Station Limited	1062	Oppose		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 306 ref. 18</i>		<i>submission.</i>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support in part submission 306 ref. 18</i>		<ul style="list-style-type: none"> • <i>Modification of proposed policy is required to either ensure it is monitoring the expression of community water values for the water body in question and/or the trends in those biophysical indicators that may indicate a movement in water quality and the expression of community values.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 18</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 18</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>

19 Policy 7.B.1 - Address discharges and disturbance

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alan McMillan	104	Amend	(c) Should also include reference to the "banks" of rivers and lakes.	<ul style="list-style-type: none"> • No reason given.
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 104 ref. 19</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
Michael Rawlinson	121	Support	Maintain Policy 7.B.1(c).	<ul style="list-style-type: none"> • Bed disturbance (from gravel extraction) and sediment (following willow removal) has ruined good trout habitat in the Shag and Waikouaiti Rivers.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 121 ref. 19</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms submitted that policy 7.B.1 is too broadly worded and does not provide specific guidance and as such opposes those submissions that support the inclusion of this policy in its current form.</i>
The Cow Farm Limited	133	Amend	Change Policy 7.B.1 to align with existing terminology.	<ul style="list-style-type: none"> • Promotes natural and human use values over other equally important values under the RMA. • Terminology inconsistent and should instead refer to "good quality water". • Phrases such as "noticeable effects" unclear, imprecise and vague, appear to be new terms not previously used in the RMA.
<i>Waitaki District Council</i>	1003	<i>Support submission 133 ref. 19</i>		<ul style="list-style-type: none"> • <i>Term "noticeable effect" imprecise and vague.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 133 ref. 19</i>		<ul style="list-style-type: none"> • <i>Further guidance on terminology is supported.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 133 ref. 19</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms supports the intent of submissions that request the amendment of policy 7.B.1 to provide more certainty and guidance.</i> • <i>Silver Fern Farms are neutral on the other specific aspects of the submissions.</i>
Waitaki District Council	138	Oppose	Oppose.	<ul style="list-style-type: none"> • The term 'noticeable effects' is too subjective and open to misinterpretation.
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 19</i>		<ul style="list-style-type: none"> • <i>Consistent with DCC position.</i> • <i>Concern about economic and social impact.</i> • <i>Control measures of PC6A go far beyond those required to achieve the stated environmental results.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 138 ref. 19</i>		<ul style="list-style-type: none"> • <i>Term is too subjective and needs to be redefined</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 138 ref. 19</i>		<ul style="list-style-type: none"> • <i>Should enable discharges with no more than minor effects.</i> • <i>Should be greater objectivity and direction in policy.</i>
<i>TrustPower</i>	1059	<i>Support submission 138 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 138 ref. 19</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 138 ref. 19</i>		<ul style="list-style-type: none"> • <i>Support the amendment of terminology.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 138 ref. 19</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms supports the intent of submissions that request the amendment of policy 7.B.1 to provide more certainty and guidance.</i> • <i>Silver Fern Farms are neutral on the other specific aspects of the submissions.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 19</i>		<ul style="list-style-type: none"> • <i>Areas of concern or support are consistent with those expressed by the NZTA.</i> • <i>Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</i> • <i>Seek the submission is allowed.</i>
Dairy NZ Limited	146	Amend	<p>Change the policy to provide more certainty on how the objectives will be achieved. For example, avoid using terminology that does not provide adequate guidance such as "noticeable effects", "minor effects", and "minimising disturbance".</p> <p>The reference to "water is of good quality" should be changed to provide consistency with the use of the term "good quality water" and specifically refer to the standards specified in Schedule 15. For example, the policy could be changed to include the following provisions: "Prohibit the discharge of treated sewage to a river or an artificial watercourse unless there are no other practicable alternatives."</p> <p>The reference to Schedule 15 should be re-drafted as an objective.</p>	<ul style="list-style-type: none"> • <i>No guidance how objectives to be achieved.</i> • <i>Doesn't provide guidance for subsequent policy, implementation methods, or consenting.</i> • <i>Provides nothing more than already in RMA and RPS.</i>
<i>Waitaki District Council</i>	1003	<i>Support submission 146 ref. 19</i>		<ul style="list-style-type: none"> • <i>Term "noticeable effect" imprecise and vague.</i>
<i>Forest and Bird NZ</i>	1007	<i>Support in part submission 146 ref. 19</i>		<ul style="list-style-type: none"> • <i>Supports the need for the objective to include numerical targets for water quality categories and link to Schedule 15.</i>
<i>The Director-General of Conservation</i>	1011	<i>Support submission 146 ref. 19</i>		<ul style="list-style-type: none"> • <i>"Goal" of the plan change is identified.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 146 ref. 19</i>		<ul style="list-style-type: none"> • <i>For the reasons given by the submitter.</i>

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<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 146 ref. 19</i>		<ul style="list-style-type: none"> • Prohibiting the discharge of treated sewage to a river or an artificial watercourse is supported. The caveat to this proposed policy, unless there are not other practicable alternatives, is opposed.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 146 ref. 19</i>		<ul style="list-style-type: none"> • Silver Fern Farms supports the intent of submissions that request the amendment of policy 7.B.1 to provide more certainty and guidance. • Silver Fern Farms are neutral on the other specific aspects of the submissions.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 19</i>		<ul style="list-style-type: none"> • Clarification required to references of 'good water quality' and 'natural and human use values'.
Pioneer Generation	147	Amend	<p>That the term 'noticeable effects' be deleted from Policy 7.B. 1(a) and the policy be amended to state: "7.B. 1 To maintain, and where appropriate, enhance the water quality of Otago's water bodies by the target dates described in Schedule 15, to support natural and human use values, by: (a) Avoiding discharges of contaminants with unacceptable adverse effects on natural and human use values and ensuring that all other effects on these values are avoided, remedied or mitigated; and ..."</p> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment set out above.</p> <p>That the term 'good quality water' be deleted from Section 7 (Water Quality).</p>	<ul style="list-style-type: none"> • "Noticeable effects", "good water quality" subjective and open to divergent interpretation. • The Act is not 'nil effects' statute. • Inappropriate to require all discharges with noticeable effects to be avoided. • 'Good water quality' not referred to or defined in NPS, RPS, or RMA.
<i>Waitaki District Council</i>	1003	<i>Support submission 147 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effects" too subjective.
<i>Contact Energy Limited</i>	1013	<i>Support submission 147 ref. 19</i>		<ul style="list-style-type: none"> • Reasons stated in the submission.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose in part submission 147 ref. 19</i>		<ul style="list-style-type: none"> • Opposes inclusion of "and ensuring that all other effects o these values are avoided, remedied or mitigated" as these effects may not be noticeable.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 147 ref. 19</i>		<ul style="list-style-type: none"> • Should be greater objectivity and direction in policy.
<i>TrustPower</i>	1059	<i>Support submission 147 ref. 19</i>		<ul style="list-style-type: none"> • Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.
<i>Alliance Group Limited</i>	1060	<i>Support submission 147 ref. 19</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 147 ref. 19</i>		<ul style="list-style-type: none"> • The provision of further guidance on the definition of 'noticeable effects' is supported.
Ernslaw One Ltd	149	Support	Retain current wording, but have other proposed rules informed by the inherent variability in sediment yield from tussock, undisturbed	<ul style="list-style-type: none"> • (b) Reflects the inherent variability in sediment yield from forestry. • Positive effects of forestry on sediment control and influence of natural

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			native bush and harvested plantation forests.	sediment yield.
Waitaki District Council	1003	Oppose submission 149 ref. 19		<ul style="list-style-type: none"> Seeks retention of current wording.
Silver Fern Farms Limited	1070	Oppose submission 149 ref. 19		<ul style="list-style-type: none"> Silver Fern Farms submitted that policy 7.B.1 is too broadly worded and does not provide specific guidance and as such opposes those submissions that support the inclusion of this policy in its current form.
Alliance Group Limited	187	Oppose	Remove from the Plan Change.	<ul style="list-style-type: none"> If catchment breaches Table 15.2, this policy will impede granting of consents for discharges regardless of the extent of effects of the discharge. Consent applicant may be required to assess compliance with Table 15.2 - arduous, costly, extensive, inefficient. Monitoring and enforcement a strain on Council resources. Onus may be on consent holders to achieve catchment targets, unfair burden.
Mr RJ Borst	1034	Support submission 187 ref. 19		<ul style="list-style-type: none"> Agrees objectives and policies should recognise positive effects of discharges and balance different values.
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	Support submission 187 ref. 19		Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Oppose submission 187 ref. 19		<ul style="list-style-type: none"> Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.
Dairy Holdings Limited	195	Amend	<p>Oppose 7.B.1(a).</p> <p>Policy 7.B.1 (b) and (c) seem enabling and appropriate but are opposed in part.</p> <p>The wider policy (and policy framework) needs to be amended to provide more certainty on how the objectives will be achieved. In</p>	<ul style="list-style-type: none"> 'Natural and human use values' need to be determined on a case-by-case basis, not well defined. Unclear if Schedule 15 intended to define objective. Inconsistent with approach set out in RMA, Part II.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>doing so it is necessary to avoid the use of terminology as "noticeable effects", "minor effects", and "minimising disturbance" without a sufficient explanation as to what, in all contexts, those terms might mean.</p> <p>The reference to "water is of good quality" should be changed to provide consistency with the use of the term "good quality water" and specifically refer to the standards specified in Schedule 15.</p>	
<i>Waitaki District Council</i>	1003	<i>Support submission 195 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effect" too subjective.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 19</i>		<ul style="list-style-type: none"> • Submission outlines concern of further submitter.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 195 ref. 19</i>		<ul style="list-style-type: none"> • Should enable discharges with no more than minor effects. • Should be greater objectivity and direction in policy.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 19</i>		<ul style="list-style-type: none"> • Support in part, particularly regarding wider effect of the plan change. • 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>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 195 ref. 19</i>		<ul style="list-style-type: none"> • Silver Fern Farms supports the intent of submissions that request the amendment of policy 7.B.1 to provide more certainty and guidance. • Silver Fern Farms are neutral on the other specific aspects of the submissions.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 19</i>		<ul style="list-style-type: none"> • Clarification required to references of 'good quality water' and 'natural and human use values'. • Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	<p>That Policy 7.B.1(a) be redrafted as follows: Advice Note or Explanation: Noticeable effects means . . .</p> <p>ALTERNATIVELY</p> <p>(a) Avoiding discharges of contaminants with noticeable effects on the characteristics of good water quality that support natural and human use values.</p> <p>That Policy 7.B.1(b) be redrafted as follows: (b) Allowing discharges of contaminants that cumulatively have no more than minor effects; and</p> <p>That Policy 7.B.1(c) be retained as currently drafted.</p>	<ul style="list-style-type: none"> • Meaning of 'noticeable effect' unclear, appropriate to provide guidance. • May be inconsistent with NPSFW, see Objective A2 and Policy A1. • Policy should not allow a freshwater body to go over its quality limits.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 197 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effects" unclear.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 197 ref. 19</i>		<ul style="list-style-type: none"> • PC6A must be consistent with NPSFW.
<i>Contact Energy Limited</i>	1013	<i>Oppose in part submission 197</i>		<ul style="list-style-type: none"> • The terms used in the Plan should be clear. • No suggestion on what the interpretation of "noticeable effects" should be.

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		<i>ref. 19</i>		<ul style="list-style-type: none"> • Then it is not possible to determine the effect if the submission were accepted. • It is appropriate to provide for short term activities where the benefits of the activity outweigh any short term adverse effects.
<i>Otago Water Resource Users Group</i>	<i>1056</i>	<i>Oppose submission 197 ref. 19</i>		<ul style="list-style-type: none"> • Reference to short-term effects should be retained to achieve practical and realistic flexibility.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Oppose submission 197 ref. 19</i>		<ul style="list-style-type: none"> • Wording as proposed encouraging adaptive management more appropriate.
<i>TrustPower</i>	<i>1059</i>	<i>Oppose submission 197 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Oppose submission 197 ref. 19</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 197 ref. 19</i>		<ul style="list-style-type: none"> • 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>	<i>1074</i>	<i>Oppose in part submission 197 ref. 19</i>		<ul style="list-style-type: none"> • Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
<i>NZ Transport Agency</i>	<i>203</i>	<i>Amend</i>	<i>Revision of Policy 7.B.1 as a consequence of amendments to Schedule 15 and the prohibited activities.</i>	<ul style="list-style-type: none"> • Reliant on Schedule 15. Implementation and the links with remainder of Plan are inappropriate. • (a), (b) and (c) are contradictory. • (a) too stringent; leads to inclusion of prohibited activities where effects would not warrant it. • (b) is supported as it provides for minor and short term discharges.
<i>Meridian Energy Limited</i>	<i>1014</i>	<i>Support submission 203 ref. 19</i>		<ul style="list-style-type: none"> • Policy 7.B.1 unduly restrictive. • The appropriateness of a discharge activity is not solely based on whether it has minor effects.
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 203 ref. 19</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Trustpower Limited</i>	<i>206</i>	<i>Amend</i>	<i>Remove this Policy, or amend it to address the concerns identified by TrustPower.</i>	<ul style="list-style-type: none"> • How would compliance by applicants be determined. Would a catchment-wide assessment be needed? • Costly requirement for applicants undertaking minor discharges. • Clarify implementation. Would consents for discharges be given in catchments where quality targets are not met? • Applicants should not be required to assess activity against Policy; its application restricted to Council functions. • Requiring "noticeable effects" to be avoided is inappropriate. • Unsure if "cumulatively" applies to all discharges in a catchment, or to all discharges proposed by an applicant. • All discharges that have no more than minor adverse effect should be allowed.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submission 206 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effect" inappropriate.
<i>New Zealand Wind Energy Association</i>	<i>1030</i>	<i>Support in part submission 206</i>		<ul style="list-style-type: none"> • Policy 7.B.1 uncertain. • May result in appropriate costs for applicants.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 19</i>		<ul style="list-style-type: none"> • <i>Amendment or deletion of policy requested.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 206 ref. 19</i>		<ul style="list-style-type: none"> • <i>Should enable discharges with no more than minor effects.</i> • <i>Should be greater objectivity and direction in policy.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 206 ref. 19</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.</i>
M C Holland Farming Ltd	207	Amend	Policy 7.B.1 is revised following revisions to the prohibited activity rules and Schedule 15.	<ul style="list-style-type: none"> • Policy resulted in suite of inappropriate rules. • No distinction between "gross pollution" and typical discharges from well-run dairy farm. • Rules apply to all discharges including those with no more than minor effects on water quality.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 207 ref. 19</i>		<ul style="list-style-type: none"> • <i>Should enable discharges with no more than minor effects.</i> • <i>Should be greater objectivity and direction in policy.</i>
Blakely Pacific Limited	209	Support	Retain current wording.	<ul style="list-style-type: none"> • Reflects the inherent variability in sediment yield from forestry.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 209 ref. 19</i>		<ul style="list-style-type: none"> • <i>Seeks retention of current wording.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 209 ref. 19</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms submitted that policy 7.B.1 is too broadly worded and does not provide specific guidance and as such opposes those submissions that support the inclusion of this policy in its current form.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 19</i>		<ul style="list-style-type: none"> • <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i>
Dunedin City Council	211	Amend	Revision of Policy 7.B.1 as a consequence of amendments to Schedule 15 and the prohibited activities.	<ul style="list-style-type: none"> • Reliance on Schedule 15 is not considered appropriate. • Too stringent, "Avoid discharges with noticeable effects" has resulted in prohibited activities for discharges where effects wouldn't warrant it.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 19</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 19</i>		<ul style="list-style-type: none"> • <i>Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.</i>
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>TrustPower</i>	1059	<i>Support submission 211 ref. 19</i>		<ul style="list-style-type: none"> • <i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 211 ref. 19</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons 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 211 ref. 19</i>		<ul style="list-style-type: none"> • <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i> • <i>Greater flexibility should be introduced (particularly in relation to the timeframes).</i> • <i>Provision should be made for resource consents for existing activities, where they do not meet the proposed discharges.</i>
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> • No reason given.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 213 ref. 19</i>		<ul style="list-style-type: none"> • <i>Submitter supports policy.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Fulton Hogan Limited	222	Amend	Redraft to provide more certainty. This could be achieved by: - Clarifying or deleting the term "good water quality" and the status of Schedule 15; - Clarifying what constitutes minimising disturbance; - Avoiding terms such as "noticeable effects and minor effects"; - Defining "short-term"; - Including detail on how the relevant objectives are to be achieved.	<ul style="list-style-type: none"> • Contains broad language and doesn't provide link between relevant objectives and rules. • Scope for misinterpretation and differences of opinions between planners.
Holcim (New Zealand) Limited	224			
<i>Waitaki District Council</i>	1003	<i>Support submissions 222 and 224 ref. 19</i>		<ul style="list-style-type: none"> • <i>Scope for misinterpretation due to language used.</i>
<i>Meridian Energy Limited</i>	1014	<i>Support in part submission 222 ref. 19</i>		<ul style="list-style-type: none"> • <i>Policy should be redrafted to clarify its intent and provide greater certainty to resource users.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 222 ref. 19</i>		<ul style="list-style-type: none"> • <i>Should enable discharges with no more than minor effects.</i> • <i>Should be greater objectivity and direction in policy.</i>
<i>TrustPower</i>	1059	<i>Support submission 222 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 222 ref. 19</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.</i>
Silver Fern Farms Limited	238	Amend	Ambiguity needs to be rectified. Inconsistency needs to be rectified.	<ul style="list-style-type: none"> • Broadly worded. • Terms provide no specific guidance. • Ambiguity as to whether mixing zones are accommodated.
<i>Waitaki District Council</i>	1003	<i>Support submission 238 ref. 19</i>		<ul style="list-style-type: none"> • <i>Scope for misinterpretation due to language used.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 238 ref. 19</i>		<ul style="list-style-type: none"> • <i>Should enable discharges with no more than minor effects.</i> • <i>Should be greater objectivity and direction in policy.</i>
<i>TrustPower</i>	1059	<i>Support submission 238 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 238 ref. 19</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.</i>
Fonterra Co-operative Group Limited	241	Amend	Change the policy to provide more certainty on how the objectives will be achieved. For example, avoid using terminology that does not provide adequate guidance such as "noticeable effects", "minor effects", and "minimising disturbance". The reference to "water is of good quality" should be changed to provide consistency with the use of the term "good quality water" and specifically refer to the standards specified in Schedule 15. For example, the policy could be changed to include the following provisions: "Prohibit the discharge of treated sewage to a river or an artificial watercourse unless there are no other practicable alternatives." The reference to Schedule 15 should be re-drafted as an objective.	<ul style="list-style-type: none"> • No guidance how objectives to be achieved. • Doesn't provide guidance for subsequent policy, implementation methods, or consenting. • Provides nothing more than already in RMA and RPS.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Waitaki District Council</i>	1003	<i>Support in part submission 241 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effects" unclear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 19</i>		<ul style="list-style-type: none"> • Should enable discharges with no more than minor effects. • Should be greater objectivity and direction in policy.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 241 ref. 19</i>		<ul style="list-style-type: none"> • Prohibiting the discharge of treated sewage to a river or an artificial watercourse is supported. The caveat to this proposed policy, unless there are no other practicable alternatives, is opposed.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 19</i>		<ul style="list-style-type: none"> • Consistent with relief sought by further submitter.
Ravensdown Fertiliser Co-operative Ltd	248	Amend	<p>Subject to addressing concerns raised below regarding the values listed in Schedule 15, opposes Policy 7.B.1(a).</p> <p>Seeks Policy 7.B.1(a) to be amended to read as follows or similar: "(a) Avoiding, remedying or mitigating, discharges of contaminants on natural and human use values."</p> <p>Supports in principle Policy 7.B.1(b) and (c).</p>	<ul style="list-style-type: none"> • (a) doesn't provide for remedying or mitigating adverse effects of contaminant discharge with noticeable effects on natural and human use values. • Need to define what is meant by 'good water quality' as not defined in water plan, NPSFW, or RMA. • Need to address what supporting 'natural and human use values' means. • In 7.B.1(a) the term 'noticeable effects' is inappropriately subjective and open to divergent interpretation. • Diffuse nature of non-point discharges difficult to identify and avoid a discharge creating a 'noticeable effect'. • Section 32 does not adequately address costs and benefits of only avoiding effects.
<i>Waitaki District Council</i>	1003	<i>Support submission 248 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effects" imprecise and vague.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 248 ref. 19</i>		<ul style="list-style-type: none"> • Consistent with RMA.
<i>Mr RJ Borst</i>	1034	Support submission 248 ref. 19		<ul style="list-style-type: none"> • Schedule 15 values are not well defined. • Unclear how values will be determined consistently. • Section 32 assessment is inadequate. • Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Federated Farmers of New Zealand	1057	Support submission 248 ref. 19		<ul style="list-style-type: none"> • Should be greater objectivity and direction in policy. • Inconsistent with RMA Part II.
TrustPower	1059	Support submission 248 ref. 19		Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.
Alliance Group Limited	1060	Support submission 248 ref. 19		• Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
Meridian Energy Limited	251	Oppose	Opposes Policy 7.B.1.	<ul style="list-style-type: none"> • Not clear whether excludes discharges from construction activities from complying with Schedule 15. • Not clear what discharges would be considered "short-term".
TrustPower	1059	Support submission 251 ref. 19		Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.
Alliance Group Limited	1060	Support submission 251 ref. 19		• Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
New Zealand Fertiliser Manufacturers Research Association Inc	252	Amend	<p>Subject to addressing concerns raised below regarding the values listed in Schedule 15, opposes Policy 7.B.1(a).</p> <p>Seeks Policy 7.B.1(a) to be amended to read as follows or similar: "(a) Avoiding, remedying or mitigating, discharges of contaminants on natural and human use values."</p> <p>Supports in principle Policy 7.B.1(b) and (c).</p>	<ul style="list-style-type: none"> • (a) doesn't provide for remedying or mitigating adverse environmental effects of contaminant discharge with noticeable effects on natural and human use values. • Need to define what is meant by 'good water quality' as not defined in water plan, NPSFW or RMA. • Need to address what supporting 'natural and human use values' means. • In 7.B.1(a) the term 'noticeable effects' is inappropriately subjective and open to divergent interpretation. • Diffuse nature of non-point discharges difficult to identify and avoid a discharge creating a 'noticeable effect'. • Section 32 does not adequately address costs and benefits of only avoiding effects.
Waitaki District Council	1003	Support submission 252 ref. 19		• Term "noticeable effects" imprecise and vague.
Mr RJ Borst	1034	Support submission 252 ref. 19		<ul style="list-style-type: none"> • Schedule 15 values are not well defined. • Unclear how values will be determined consistently. • Section 32 assessment is inadequate. • Rules need to be clear and unambiguous.
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			

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 252 ref. 19		<ul style="list-style-type: none"> • Should be greater objectivity and direction in policy. • Inconsistent with RMA Part II.
<i>TrustPower</i>	1059	Support submission 252 ref. 19		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	Support submission 252 ref. 19		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
Rayonier New Zealand Ltd	256	Support	Retain current wording.	<ul style="list-style-type: none"> • Forestry rotational land use, results in slight increase of sediment perhaps once every 26-45 years. • Important point which needs to be recognised.
<i>Waitaki District Council</i>	1003	Oppose submission 256 ref. 19		<ul style="list-style-type: none"> • Seeks retention of current wording.
<i>Silver Fern Farms Limited</i>	1070	Oppose submission 256 ref. 19		<ul style="list-style-type: none"> • Silver Fern Farms submitted that policy 7.B.1 is too broadly worded and does not provide specific guidance and as such opposes those submissions that support the inclusion of this policy in its current form.
Waitaki Irrigators Collective Limited	257	Amend	Change the wording of the policy to more accurately reflect its presumed intent, perhaps to "adverse effects" which would better align with the RMA.	<ul style="list-style-type: none"> • "Noticeable effects" broad term with many interpretations, both adverse and non-adverse. • What time frame is there to be assessment of "notice-ability".
<i>Waitaki District Council</i>	1003	Support submission 257 ref. 19		<ul style="list-style-type: none"> • Term "noticeable effects" unclear.
<i>Contact Energy Limited</i>	1013	Oppose submission 257 ref. 19		<ul style="list-style-type: none"> • The intent of a reference to "noticeable effects" is to import a degree of significance or materiality. • The suggested relief would remove any criteria of significance/materiality.
Ballance Agri-Nutrients Ltd	262	Amend	<p>Subject to addressing concerns raised below regarding the values listed in Schedule 15, opposes Policy 7.B.1(a).</p> <p>Seeks Policy 7.B.1(a) to be amended to read as follows or similar: "(a) Avoiding, remedying or mitigating, discharges of contaminants on natural and human use values."</p> <p>Supports in principle Policy 7.B.1(b) and (c).</p>	<ul style="list-style-type: none"> • Need to define what is meant by 'good water quality' as not defined in water plan, NPSFW, or RMA. • Need to address what supporting 'natural and human use values' means. • In 7.B.1(a) the term 'noticeable effects' is inappropriately subjective and open to divergent interpretation. • Diffuse nature of non-point discharges difficult to identify and avoid a discharge creating a 'noticeable effect'. • Section 32 does not adequately address costs and benefits of only avoiding effects.
<i>Waitaki District Council</i>	1003	Support submission 262 ref. 19		<ul style="list-style-type: none"> • Term "noticeable effects" imprecise and vague.
<i>Mr RJ Borst</i>	1034	Support		
<i>Mr NS Mackenzie</i>	1035	Support		
<i>Mr BJ Graham</i>	1036	Support		
<i>Mr TR Michelle</i>	1037	Support		
<i>Dunedin International Airport</i>	1038	Support		<ul style="list-style-type: none"> • Schedule 15 values are not well defined. • Unclear how values will be determined consistently. • Section 32 assessment is inadequate. • Rules need to be clear and unambiguous.

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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 19</i>		<ul style="list-style-type: none"> • Should be greater objectivity and direction in policy. • Inconsistent with RMA Part II.
<i>TrustPower</i>	1059	<i>Support submission 262 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 19</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Introduce greater flexibility in relation to the timeframes set out in Policy 7.B.1.	<ul style="list-style-type: none"> • Largely support policy. • Need to avoid disproportionate costs on land managers, and to provide flexibility in order to give effect to the NPSFW 2030 deadline.
Environmental Defence Society	267	Amend	Amend the policy so that there is an explanation as to where in the plan 'good quality' is defined in a measurable way, and what 'natural and human use values' mean. Amend Policy so that 'noticeable effects' are specified in more precise detail.	<ul style="list-style-type: none"> • Too vague as to what 'good quality' is. • What values is good water quality intended to support. • What are 'noticeable effects'. • Supports avoiding discharges with noticeable adverse effects. • Needs to more precisely defined so clear what discharges are prohibited.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 267 ref. 19</i>		<ul style="list-style-type: none"> • What are "noticeable effects"?
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 267 ref. 19</i>		<ul style="list-style-type: none"> • Supports general desirability of clarity. • The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 267 ref. 19</i>		<ul style="list-style-type: none"> • Need clarity in use of terminology.
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 267 ref. 19</i>		<ul style="list-style-type: none"> • Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.
<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
<i>Mr DC Greer</i>	1039			
<i>Mr RG & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 in part submission 267 ref. 19</i>		<i>• Clarity will assist plan usability and aware of what is expected of landowners.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 19</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. 19</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>
Colin Scurr	268	Amend	Amend Policy to reflect terminology of the Act and to address activities that have identifiable effects. The Policy should be amended to include reference to remediation and mitigation methods and use terms consistent with the wording of the Act, the NPS and the RPS.	<ul style="list-style-type: none"> • Has effect of placing 'natural and human use values' above all else. • Fails to refer to 'remedying and mitigating' effects. Does not reflect scheme of RMA. • Term 'noticeable effects' does not reflect any statutory term, guideline or standard. • Introduction of new classification terms not used elsewhere creates uncertainty. • RMA, NPS, and RPS refer to terms 'conspicuous' and 'offensive' and 'reasonable mixing' which are well understood
<i>Waitaki District Council</i>	1003	<i>Support submission 268 ref. 19</i>		<i>• Term "noticeable effects" unclear.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 19</i>		<ul style="list-style-type: none"> • <i>Should be greater objectivity and direction in policy.</i> • <i>Inconsistent with RMA Part II.</i>
Horticulture New Zealand	269	Amend	Undertake a review of the natural and human use values and amend Schedule 15 so that the natural and human use values are supported and achievable and reword as follows: "Ensure that water quality is maintained by avoiding, remedying or mitigating the effects of discharges of contaminants to water".	<ul style="list-style-type: none"> • Policy uses terms not defined or addressed in case law, e.g. 'noticeable effects'. • Only provides for avoid, RMA provides for avoidance, mitigation and remediation.
<i>Waitaki District Council</i>	1003	<i>Support submission 269 ref. 19</i>		<i>• "Noticeable effects" not defined.</i>
<i>TrustPower</i>	1059	<i>Support submission 269</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 19</i>		
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 19</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 19</i>		<ul style="list-style-type: none"> • Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities. • Too vague, need to be more specific.
Forest and Bird	271	Amend	Amend to read: "7.B.1 Ensure water is of good quality and meets the limits and the target dates described in Schedule 15, to support natural and human use values, by: (a) – (b) ; and (c) Minimising disturbance of the beds and margins of rivers, lakes, and wetlands."	<ul style="list-style-type: none"> • All waterways must meet the limits and target dates in Schedule 15. • Needs to reflect RMA Section 6 matters e.g. Wetlands, and margins of waterbodies.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 271 ref. 19</i>		<ul style="list-style-type: none"> • Submitter seeks retention of 7.B.1 (a).
<i>The Director-General of Conservation</i>	1011	<i>Support submission 271 ref. 19</i>		<ul style="list-style-type: none"> • "Goal" of the plan change is identified.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 19</i>		<ul style="list-style-type: none"> • Not all waterways need to be enhanced. • Background data required before any agricultural activities are restricted.
<i>Contact Energy Limited</i>	1013	<i>Oppose in part submission 271 ref. 19</i>		<ul style="list-style-type: none"> • The suggested amendment to the opening words of Policy 7.B.1 would introduce confusion by its implication that Schedule 15 does not set out the relevant tests of "good quality".
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 19</i>		<ul style="list-style-type: none"> • Not practicable to minimise the use of all beds of rivers and lakes and wetlands. The level of activity may depend on their quality and this has not been determined.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 271 ref. 19</i>		<i>submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 19</i>		<ul style="list-style-type: none"> • <i>Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 19</i>		<ul style="list-style-type: none"> • <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 19</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Fish and Game (Central South Island)	273	Amend	<p>Amend "good" to "at least good" water quality.</p> <p>Amend (a) as follows: "Avoiding discharges of contaminants with effects on natural and human use values;..."</p> <p>Amend (b) as follows: "Allowing discharges of contaminants that cumulatively have minor effects; and..."</p>	<ul style="list-style-type: none"> • <i>Implies a degradation from "excellent" to merely "good" quality.</i> • <i>Term "noticeable" is new, deviating from 'conspicuous' or measurable. Some discharges may not be conspicuous, and could continue. Noticeable may not be enough for enforcement.</i> • <i>Unclear if phrase "noticeable effects on ... values" applies to an effect that is visually obvious, or has a subsequent effect.</i> • <i>Policy needs clarity that discharges have no visual or measurable effect on water quality.</i>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 273 ref. 19</i>		<ul style="list-style-type: none"> • <i>What are "noticeable effects"?</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 19</i>		<ul style="list-style-type: none"> • <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 273 ref. 19</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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</i>	1056	<i>Oppose in part</i>		<i>Policy needs to appropriately address short-term events.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Group</i>		<i>submission 273 ref. 19</i>		
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 273 ref. 19</i>		<ul style="list-style-type: none"> • Extending beyond 'good' and 'noticeable' to effects unrealistic, unachievable and generic. • Inconsistent with RMA s5.
<i>TrustPower</i>	1059	<i>Oppose submission 273 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 273 ref. 19</i>		• Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 19</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Federated Farmers of New Zealand	278	Amend	Amend the policy as follows to provide for the remedy or mitigation of effects: "a) Avoiding, remedy or mitigate the effects of discharges of contaminants with noticeable effects on natural and human use values; and..."	<ul style="list-style-type: none"> • Concern about use of "avoiding" discharges of contaminants, as the Plan specifically permits certain discharges to water and to land in a manner which may enter water. • RMA provides for avoiding, remedying or mitigating of adverse effects.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 19</i>		• Practical and workable alternatives, solutions and suggestions.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 19</i>		• Discharges need to be avoided.
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 19</i>		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 19</i>		• No reason given.
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 278 ref. 19</i>		<ul style="list-style-type: none"> • Some discharges need to be avoided. • This is necessary to provide a consistent link with the subsequent policy.
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 278 ref. 19</i>		• Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 19</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 19</i>		<ul style="list-style-type: none"> • Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use. • Effects-based approach should allow for discharges that exceed Schedule 16 limits.
Wenita Forest Products	279	Support	Retain current wording.	• Reflects the inherent variability in sediment yield from forestry.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Waitaki District Council	1003	Oppose submission 279 ref. 19		<ul style="list-style-type: none"> Seeks retention of current wording.
Calder Stewart Industries Limited	1049	Support submission 279 ref. 19		<ul style="list-style-type: none"> Agree with submission in relation to Objectives and policies. Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. Matters relating to reasonable mixing need to be reconsidered.
TrustPower	1059	Oppose submission 279 ref. 19		Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.
Alliance Group Limited	1060	Oppose submission 279 ref. 19		Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
Silver Fern Farms Limited	1070	Oppose submission 279 ref. 19		Silver Fern Farms submitted that policy 7.B.1 is too broadly worded and does not provide specific guidance and as such opposes those submissions that support the inclusion of this policy in its current form.
Annie Stuart	280	Amend	Provide greater clarity as to the terms 'cumulative minor effects' and 'short-term'.	Concerned this will allow for activities such as 'fracking' as short term activities.
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Amend	Plan change should recognise that plantation forestry results in a pulse of sediment every 26-50+ years.	Over the long term plantation forestry land use has more positive effects on water quality than negative effects
Calder Stewart Industries Limited	1049	Support submission 282 ref. 19		<ul style="list-style-type: none"> Plan change should recognise the specific nature of plantation forestry. Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. Matters relating to reasonable mixing need to be reconsidered.
City Forests Limited	283	Support	Retain current wording.	Reflects the inherent variability in sediment yield from forestry.
Waitaki District Council	1003	Oppose submission 283 ref. 19		Seeks retention of current wording.
Calder Stewart Industries Limited	1049	Support submission 283 ref. 19		<ul style="list-style-type: none"> Agree with submission in relation to Objectives and policies. Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. Matters relating to reasonable mixing need to be reconsidered.
TrustPower	1059	Oppose submission 283 ref. 19		Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.
Alliance Group Limited	1060	Oppose submission 283 ref. 19		Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
Silver Fern Farms Limited	1070	Oppose submission 283 ref. 19		Silver Fern Farms submitted that policy 7.B.1 is too broadly worded and does not provide specific guidance and as such opposes those submissions that support the inclusion of this policy in its current form.
Contact Energy Limited	284	Amend	Amend Policy 7.B.1 to read as follows: "Ensure water in Otago's freshwater bodies is of good quality when those water bodies are at mean flows and/or levels by the target dates described in Schedule 15, by: (a) Avoiding discharges which introduce contaminants to a water body at quantities or in a manner not previously present and that have a significant effect on natural and human use values; and (b) Minimising disturbance of the beds of rivers and lakes for	<ul style="list-style-type: none"> Use of broadly defined term 'water' has unintended effects. No need to include the reason for the policy. Avoiding 'noticeable' effects on values is impossible for hydro structures which discharge the water they receive. Allowing short term minor effects is inconsistent with ensuring good water quality. Not clear what 'minimising' means re bed disturbance, so could compromise flood mitigation measures.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			purposes other than mitigation of flood risk, enhancement of amenity or recreational values, or that is necessary for construction of structures requiring to be located in a river or lakebed or on the banks of a river; while (d) Allowing discharges of contaminants that cumulatively have minor effects or are short-term.	
Fish and Game (Otago)	287	Amend	Amend "good" to "at least good" water quality. Replace "noticeable" with "noticeable effect on relevant water quality standards and/or measurable effect on natural or human use values" OR Such other relief that gives effect to the concerns [in submission].	<ul style="list-style-type: none"> Implies a degradation from "excellent" to merely "good" quality. Term "noticeable" is new, deviating from 'conspicuous' or measurable. Some discharges may not be conspicuous, and could continue. Noticeable may not be enough for enforcement. Unclear if phrase "noticeable effects on ... values" applies to an effect that is visually obvious, or has a subsequent effect. Policy needs clarity that discharges have no visual or measurable effect on water quality.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 287 ref. 19</i>		<ul style="list-style-type: none"> What are "noticeable effects"?
<i>Forest and Bird NZ</i>	1007	<i>Support submission 287 ref. 19</i>		<ul style="list-style-type: none"> Upper catchments need to be separated from lower catchments. Lakes and waterways with existing high water quality must be in categories that maintain high water quality.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 287 ref. 19</i>		<ul style="list-style-type: none"> Clarifies the purpose of the provision.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 19</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality. Affected by a variety of activities, not just agricultural uses. Imposes unnecessary constraints on farming practices.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 287 ref. 19</i>		<ul style="list-style-type: none"> Suggested clarification unclear. Reference to a measurable effect would catch a wide range of effects irrespective of significance or materiality.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 19</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 287 ref. 19</i>		<ul style="list-style-type: none"> • Extending beyond 'good' and 'noticeable' to effects unrealistic, unachievable and generic. • Inconsistent with RMA s5.
<i>TrustPower</i>	1059	<i>Oppose submission 287 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 287 ref. 19</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 19</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Southern Wood Council</i>	289	Support	Retain current wording.	<ul style="list-style-type: none"> • Reflects the inherent variability in sediment yield from forestry.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 289 ref. 19</i>		<ul style="list-style-type: none"> • Seeks retention of current wording.
<i>TrustPower</i>	1059	<i>Oppose submission 289 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 289 ref. 19</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 289 ref. 19</i>		<ul style="list-style-type: none"> • Silver Fern Farms submitted that policy 7.B.1 is too broadly worded and does not provide specific guidance and as such opposes those submissions that support the inclusion of this policy in its current form.
<i>Deer Industry New Zealand</i>	293	Amend	Support but believe that the definition of good quality should be more objective.	<ul style="list-style-type: none"> • There is considerable variation in proposed standards in catchments around the region and quite different interpretations of quality and use.
<i>Clydevale Dairy Farms Ltd</i>	297	Amend	Amend Policy 7.B.1 so that it takes into account the full spectrum of values; include reference to remediation and mitigation methods; and uses terms consistent with the wording of the RMA, the NPS and the RPS.	<ul style="list-style-type: none"> • Balancing of values and uses in managing water quality not enabled; 'natural and human use values' placed above other values. • "Avoidance" of "noticeable effects" does not reflect requirements of RMA. New terms create uncertainty. • Noticeable adverse effect less than minor or a noticeable positive effect must be avoided.
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			
<i>Waitaki District Council</i>	1003	<i>Support submissions 297 – 299 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effects" creates uncertainty.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 297 – 299 ref. 19</i>		<ul style="list-style-type: none"> • Should enable discharges with no more than minor effects. • Should be greater objectivity and direction in policy.
<i>The Director-General of Conservation</i>	306	Amend	That 7.B.1 be amended as follows, or to like effect: Ensure water is of good quality and that this goal is reached by meeting both the specified measures and the target dates described in Schedule 15, to support natural and human use values, by: (a) Avoiding discharges of contaminants with noticeable effects on natural and human use values; and (b) Allowing discharges of contaminants that cumulatively have	<ul style="list-style-type: none"> • Needs to be clear that ensuring good water quality is dependent on achieving the specified standards by the target date. • To give effect to RMA S 30(1)(c)(iia). • Most significant habitats of acutely threatened indigenous freshwater fish should be protected. • Including a new Schedule provides greater clarity. • A start on identifying the water bodies where such significant habitats occur has been made. However, in the time available it has not been possible to

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>minor effects, or are short-term; and</p> <p>(c) Minimising disturbance of the beds of rivers and lakes, particularly in areas which contain significant indigenous flora or which provide significant habitats for indigenous fauna, the latter as defined in Schedule xx - Areas of Significant Aquatic Values (see original submission document).</p> <p>That 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>	define all these areas with certainty. The areas will be refined prior to the hearing.
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • Severely and unreasonably constrains lawful land use activities, with potentially adverse economic impacts. • Approach does not acknowledge local environmental conditions. • Contrary to the purpose of the RMA.
<i>Forest and Bird NZ</i>	1007	<i>Support submission 306 ref. 19</i>		<ul style="list-style-type: none"> • RMA requires recognition and protection of significant indigenous vegetation and significant habitats of indigenous fauna.
<i>DJ & KR Scott</i>	1008	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • 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.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • No need for further restrictions on discharges.
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • 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>JH William & KA McNally</i>	1020	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • 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.
<i>RJ McNally</i>	1021			
<i>Kim & Mary Heany</i>	1024			
<i>TJ & NM Arthur</i>	1026	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • 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. • Inaccuracy of maps. • Stock lightly grazing the waterways protects fish habitat and water quality.
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • Too stringent.
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • Inclusion of Schedule is not supported without full S32 report.
<i>Ida Valley Station / Ida Valley Irrigation Co</i>	1033	<i>Oppose submission 306 ref. 19</i>		<ul style="list-style-type: none"> • 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.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • 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. 19		<ul style="list-style-type: none"> • 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 wetlands 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. • Restrictions on seasonal musters are inappropriate. • Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter. • No gain from high and costly level of consenting requirements if the Council cannot monitor and enforce provisions. • 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			
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. 19		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • 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 wetlands 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. • Restrictions on seasonal musters are inappropriate. • Various discharges are required and encouraged under today's farming practices: no need to restrict these discharges in the manner sought by the submitter.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • No gain from high and costly level of consenting requirements if the Council cannot monitor and enforce provisions. • Proposed changes would require an enormous number of staff to monitor.
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • Without identified areas, scope of changes and consequential effects cannot be identified. • Requested changes would require extensive and unreasonable fencing off of waterways, loss of grazing and loss of access to stockwater. • Values are present with the current stock management system. • Preventing the erection, maintenance, replacement etc. of crossing structures is counter-productive. • Removal of flood debris must take place.
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • Inconsistency with RMA Part II. • Extends beyond scope of plan change. • Will impact farming given lack of environmental issues.
TrustPower	1059	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • Opposes new Schedule proposed by DoC, although agrees further analysis required to fully understand waterways' natural and human use values. • Should be accompanied by a robust section 32 analysis and supporting material. • Should be initiated by the Council.
Glenshee Station Limited	1062	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Snowline Ltd	1076	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • No opportunity was given to effected landowners to enter dialogue on a case-by-case basis. • Areas have not been identified with certainty. • Insufficient time for landowners and decision makers to consider practical and legal effects.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 19		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Amend	Policy 7.B.1 should be amended to include reference to remediation and mitigation methods and use of terms consistent with the wording of the Act, the NPS and the RPS.	<ul style="list-style-type: none"> • 'Natural and human use values' placed above all others, without weighing other values and balancing uses. • Failure to refer to 'remedying and mitigating' effects does not reflect or achieve purpose of RMA. • 'Noticeable effects' a new and uncertain term. RMA, NPS and RPS refer to well understood 'offensive' or 'conspicuous' discharges, or provide for reasonable mixing.
Waitaki District Council	1003	Support submission 308 ref. 19		<ul style="list-style-type: none"> • Term "noticeable effects" a new and uncertain term.
The Director-General of Conservation	1011	Support submission 308 ref. 19		<ul style="list-style-type: none"> • PC6A must be consistent with wording of the RMA, NPSFW and RPS.
Dunedin City Council	1025	Support		<ul style="list-style-type: none"> • No reasons given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 308 ref. 19</i>		
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 308 ref. 19</i>		<i>• No reason given.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 308 ref. 19</i>		<i>• Should be greater objectivity and direction in policy. • Inconsistency with RMA Part II. • Not considering 'remedying and mitigating' effects doesn't reflect RMA.</i>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 308 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 308 ref. 19</i>		<i>• Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 308 ref. 19</i>		<i>• Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Amend	Policy 7.B.1 should be amended to include reference to remediation and mitigation methods and use of terms consistent with the wording of the Act, the NPS and the RPS.	<ul style="list-style-type: none"> • 'Natural and human use values' placed above all others, without weighing other values and balancing uses. • Failure to refer to 'remedying and mitigating' effects does not reflect or achieve purpose of RMA. • 'Noticeable effects' a new and uncertain term. RMA, NPS and RPS refer to well understood 'offensive' or 'conspicuous' discharges, or provide for reasonable mixing.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submission 309 ref. 19</i>		<i>• Term "noticeable effects" a new and uncertain term.</i>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 309 ref. 19</i>		<i>• No reasons given.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 309 ref. 19</i>		<i>• No reason given.</i>
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Support submission 309 ref. 19</i>		<i>• Support conclusion that section 32 inadequate and that plan change should be consistent with RMA, NPSFW and RPS.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 309 ref. 19</i>		<i>• Should be greater objectivity and direction in policy. • Inconsistency with RMA Part II. • Not considering 'remedying and mitigating' effects doesn't reflect RMA.</i>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 309 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 309 ref. 19</i>		<i>• Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Support submission 309 ref. 19</i>		<i>• Protects habitats and the wider needs of mahika kai, taoka species and other species of importance to Kai Tahu ki Otago.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 309</i>		<i>• Seek that the submission be allowed and the Plan Change amended as per the submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 19</i>		
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 19</i>		<ul style="list-style-type: none"> • 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	Amend Policy 7.B.1 to reflect terminology in other statutory documents and to address activities that have adverse effects.	<ul style="list-style-type: none"> • 'Natural and human use values' placed above all others, without weighing other values and balancing uses. • Failure to refer to 'remediating and mitigating' effects does not reflect or achieve purpose of RMA. • 'Noticeable effects' a new and uncertain term. RMA, NPS and RPS refer to well understood 'offensive' or 'conspicuous' discharges, or provide for reasonable mixing.
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>Waitaki District Council</i>	1003	<i>Support submissions 310 – 326 ref. 19</i>		<ul style="list-style-type: none"> • Term "noticeable effects" a new and uncertain term.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 – 326 ref. 19</i>		<ul style="list-style-type: none"> • Should be greater objectivity and direction in policy. • Inconsistency with RMA Part II. • Not considering 'remediating and mitigating' effects doesn't reflect RMA.
<i>TrustPower</i>	1059	<i>Support submission 323 ref. 19</i>		<i>Policy 7.B.1 should be withdrawn or amended for the reasons set out in original submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 19</i>		<ul style="list-style-type: none"> • Alliance seeks that Policy 7.B.1 is withdrawn or amended significantly for the reasons in its original submission.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 19</i>		<ul style="list-style-type: none"> • 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.

20 Policy 7.B.2 / 7.7.1 - Promote discharge to land

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
The Cow Farm Limited	133	Oppose	Delete this policy.	<ul style="list-style-type: none"> • Seeks to shift all discharges to land rather than water. • Under the RMA, any activity with no more than minor effect, or that can be

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				remedied/mitigated to result in no more than minor effect, should be allowed by way of resource consent. • No justification for preventing discharges to water where the effects are no more than minor, and/or the effects can be adequately remedied or mitigated.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 133 ref. 20</i>		• <i>The discharge of contaminants to land is supported.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 133 ref. 20</i>		• <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
Otago Conservation Board	140	Support	Supports Policy 7.B.2.	• No reason given.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 140 ref. 20</i>		• <i>Gives effect to the RMA.</i>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 140 ref. 20</i>		• <i>No reasons given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose in part submission 140 ref. 20</i>		• <i>Not all waterways in Otago should be protected or enhanced. Many are affected by activities other than farming.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 140 ref. 20</i>		• <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 140 ref. 20</i>		• <i>Silver Fern Farms originally submitted against the deletion of the term "where appropriate" from policy 7.B.2/7.7.1 for reasons in the original submission, including inconsistency with the effects based nature of the RMA, and therefore opposes submissions supporting the deletion of the term.</i>
<i>DF1 Ltd and DF3 Ltd, being</i>	1074	<i>Oppose</i>		• <i>Does not take into account local environmental conditions and</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 140 ref. 20</i>		<i>economic/development consideration.</i> <i>• Is disproportionate and overly restrictive.</i>
Dairy NZ Limited	146	Oppose	Delete the policy. It would be preferable to establish provisions that ensure that numerical water quality standards are maintained.	<ul style="list-style-type: none"> • Creates problems for consents as no clear numerical water quality standards. • If standards maintained then inappropriate to direct discharge to land.
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 146 ref. 20</i>		<ul style="list-style-type: none"> • <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose submission 146 ref. 20</i>		<ul style="list-style-type: none"> • <i>The discharge of contaminants to land is supported.</i>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support submission 146 ref. 20</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose in part submission 146 ref. 20</i>		<ul style="list-style-type: none"> • <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
Pioneer Generation	147	Oppose	That Policy 7.7.1 of the adopted version of Section 7 (Water Quality) of the Regional Plan be retained. Any similar amendments to like effect. Any consequential amendments that stem from the amendment set out above.	<ul style="list-style-type: none"> • Oppose deletion of "where appropriate". • Not practical for Hydropower to discharge to land. • No basis for this approach in the Act or NPS. • NPS and RSP provide for discharges to water. • Ability to discharge to land or water needs to be retained.
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 147 ref. 20</i>		<ul style="list-style-type: none"> • <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose submission 147 ref. 20</i>		<ul style="list-style-type: none"> • <i>The discharge of contaminants to land is supported.</i>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	That Policy 7.B.2 be retained as currently drafted.	<ul style="list-style-type: none"> • Supports policy.
<i>TrustPower</i>	<i>1059</i>	<i>Oppose submission 197 ref. 20</i>		<ul style="list-style-type: none"> • <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 197 ref. 20</i>		<ul style="list-style-type: none"> • <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. 20</i>		<ul style="list-style-type: none"> • <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
Trustpower Limited	206	Amend	Recognise that for some activities discharges to water are an inevitable component.	<ul style="list-style-type: none"> • Expectation for some activities is unrealistic • Should be recognised in Policy or in its explanation.
<i>New Zealand Wind Energy Association</i>	<i>1030</i>	<i>Support submission 206 ref. 20</i>		<ul style="list-style-type: none"> • <i>Expecting all activities to discharge to land unrealistic: renewable electricity generation (REG) activities may need to discharge to water.</i> • <i>Under NPSREG, Regional Water Plan must provide for REG activities.</i>

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 206 ref. 20</i>		<ul style="list-style-type: none"> For the reasons given by the submitter.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 206 ref. 20</i>		<ul style="list-style-type: none"> Ensure policy realistic and achievable. Inconsistent with RMA.
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 206 ref. 20</i>		<ul style="list-style-type: none"> Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.
Dunedin City Council	211	Oppose	That Policy 7.B.2 is amended to reinsert the words "where appropriate" at the end.	<ul style="list-style-type: none"> Inconsistent with NPSFW and the RPS. Only promote discharges to land where practical.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 20</i>		<ul style="list-style-type: none"> No reason given.
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 20</i>		<ul style="list-style-type: none"> Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.
<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. 20</i>		<ul style="list-style-type: none"> Ensure policy realistic and achievable. Inconsistent with RMA.
<i>TrustPower</i>	1059	<i>Support submission 211 ref. 20</i>		<ul style="list-style-type: none"> Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 211 ref. 20</i>		<ul style="list-style-type: none"> Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 20</i>		<ul style="list-style-type: none"> 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.
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 213 ref. 20</i>		<ul style="list-style-type: none"> Silver Fern Farms originally submitted against the deletion of the term "where appropriate" from policy 7.B.2/7.7.1 for reasons in the original submission, including inconsistency with the effects based nature of the RMA, and therefore opposes submissions supporting the deletion of the term.
Silver Fern Farms Limited	238	Oppose	The term 'where appropriate' should be reinstated.	<ul style="list-style-type: none"> Changes all point source to non-point source discharge. Water can be most appropriate disposal method. Inconsistent with effects-based RMA.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 238 ref. 20</i>		<ul style="list-style-type: none"> Ensure policy realistic and achievable. Inconsistent with RMA.
<i>TrustPower</i>	1059	<i>Support submission 238 ref. 20</i>		<ul style="list-style-type: none"> Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
Fonterra Co-operative Group Limited	241	Oppose	Delete the policy. It would be preferable to establish provisions that ensure that those [numerical water quality] standards are maintained.	<ul style="list-style-type: none"> Creates problems for resource consents as no clear numerical water quality standards. If standards maintained then inappropriate to direct discharge to land.
<i>TrustPower</i>	1059	<i>Support</i>		<ul style="list-style-type: none"> Unrealistic expectation to discharge to land in preference to water, for some

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 241 ref. 20</i>		<i>activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 241 ref. 20</i>		• <i>The discharge of contaminants to land is supported.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 20</i>		• <i>Consistent with relief sought by further submitter.</i>
Ravensdown Fertiliser Co-operative Ltd	248	Amend	The phrase 'where appropriate' to be retained.	• Deletion of 'where appropriate' diminishes ability to successfully advance applications for discharge of contaminants to water. • Inappropriate as no more than minor effect is allowed by the RMA.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 248 ref. 20</i>		• <i>Proposed change would support the intent of the policy, but ensure that consents can be obtained for appropriate discharges to water.</i>
<i>Mr RJ Borst</i>	1034	<i>Support submissions 248 and 252 ref. 20</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 in part submissions 248 and 252 ref. 20</i>		• <i>Ensure policy realistic and achievable.</i> • <i>Inconsistent with RMA.</i>
<i>TrustPower</i>	1059	<i>Support submissions 248 and 252 ref. 20</i>		• <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support</i>		• <i>Silver Fern Farms originally submitted against the proposed change to policy</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submissions 248 and 252 ref. 20</i>		<i>7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
Queenstown Lakes District Council	255	Support	Retain Policy 7.B.2.	<ul style="list-style-type: none"> • Support changes.
Clutha District Council	1050	Oppose in part submission 255 ref. 20		<ul style="list-style-type: none"> • No reasons given.
Central Otago District Council	1051	Oppose in part submission 255 ref. 20		<ul style="list-style-type: none"> • No reasons given.
Central Otago Wine Growers Association	1054	Oppose in part submission 255 ref. 20		<ul style="list-style-type: none"> • No reasons given.
TrustPower	1059	Oppose submission 255 ref. 20		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
Silver Fern Farms Limited	1070	Oppose submission 255 ref. 20		<ul style="list-style-type: none"> • Silver Fern Farms originally submitted against the deletion of the term "where appropriate" from policy 7.B.2/7.7.1 for reasons in the original submission, including inconsistency with the effects based nature of the RMA, and therefore opposes submissions supporting the deletion of the term.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 255 ref. 20		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Ballance Agri-Nutrients Ltd	262	Amend	The phrase 'where appropriate' to be retained.	<ul style="list-style-type: none"> • Deletion of 'where appropriate' diminishes ability to successfully advance applications for discharge of contaminants to water. • Inappropriate as no more than minor effect is allowed by the RMA.
Mr RJ Borst	1034	Support submission 262 ref. 20		<ul style="list-style-type: none"> • Rules need to be clear and unambiguous.
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	1057	Support in part		<ul style="list-style-type: none"> • Ensure policy realistic and achievable.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 262 ref. 20</i>		<ul style="list-style-type: none"> • <i>Inconsistent with RMA.</i>
<i>TrustPower</i>	1059	<i>Support submission 262 ref. 20</i>		<ul style="list-style-type: none"> • <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 262 ref. 20</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Introduce greater flexibility in relation to the timeframes set out in Policy 7.B.2.	<ul style="list-style-type: none"> • Largely support policy. • Need to avoid disproportionate costs on land managers, and to provide flexibility in order to give effect to the NPSFW 2030 deadline.
Colin Scurr	268	Oppose	Reinstate "where appropriate" or delete Policy 7.B.2.	<ul style="list-style-type: none"> • Strongly oppose deletion of 'where appropriate'. • Not consistent with NPS, RPS or RMA which requires all relevant factors and effects to be weighed and balanced. • Does not recognise other values water has under NPS. • NPS also recognises some discharges to water are necessary. • Inconsistent with the RPS Policy 6.5.5 which only promotes discharges to land where practicable.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 20</i>		<ul style="list-style-type: none"> • <i>Ensure policy realistic and achievable.</i> • <i>Inconsistent with RMA.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 268 ref. 20</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
Horticulture New Zealand	269	Oppose	Retain the words 'where appropriate' in Policy 7.B.2.	<ul style="list-style-type: none"> • Discharges to land may not always be appropriate.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 20</i>		<ul style="list-style-type: none"> • <i>Ensure policy realistic and achievable.</i> • <i>Inconsistent with RMA.</i>
<i>TrustPower</i>	1059	<i>Support submission 269 ref. 20</i>		<ul style="list-style-type: none"> • <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 20</i>		<ul style="list-style-type: none"> • <i>Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 269 ref. 20</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
Forest and Bird	271	Support	Retain Policy as publicly notified.	<ul style="list-style-type: none"> • Supports policy.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 271 ref. 20</i>		<ul style="list-style-type: none"> • <i>Gives effect to the RMA.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 20</i>		<ul style="list-style-type: none"> • <i>Not all waterways need to be enhanced.</i> • <i>Background data required before any agricultural activities are restricted.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 20</i>		<ul style="list-style-type: none"> • <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</i>	1038			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Limited</i>				
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 271 ref. 20		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
Glenshee Station Limited	1062	Oppose submission 271 ref. 20		<ul style="list-style-type: none"> • 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.
Silver Fern Farms Limited	1070	Oppose submission 271 ref. 20		<ul style="list-style-type: none"> • Silver Fern Farms originally submitted against the deletion of the term "where appropriate" from policy 7.B.2/7.7.1 for reasons in the original submission, including inconsistency with the effects based nature of the RMA, and therefore opposes submissions supporting the deletion of the term.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 271 ref. 20		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 271 ref. 20		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Fish and Game (Central South Island)	273	Support	Retain as worded.	<ul style="list-style-type: none"> • Support discharge of contaminants to land in preference to water.
Craiglea Limited	1012	Oppose submission 273 ref. 20		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
Mr RJ Borst	1034	Oppose submission 273 ref. 20		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
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			

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 & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 273 ref. 20</i>		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 273 ref. 20</i>		<ul style="list-style-type: none"> • Silver Fern Farms originally submitted against the deletion of the term "where appropriate" from policy 7.B.2/7.1 for reasons in the original submission, including inconsistency with the effects based nature of the RMA, and therefore opposes submissions supporting the deletion of the term.
Contact Energy Limited	284	Amend	<p>Amend Policy 7.B.2 to read as follows: "To promote discharges of contaminants to land in preference to water, where that is practicable and will result in better environmental outcomes."</p> <p>Alternatively, make separate provision for lawfully established dams where the contaminants in the water passed through or over the dam were discharged to the water body upstream of the dam.</p>	<ul style="list-style-type: none"> • Deletion of 'where appropriate' prevents consideration of circumstances. • With hydro structures, cannot take sediment from water and discharge it to land.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 284 ref. 20</i>		<ul style="list-style-type: none"> • Ensure policy realistic and achievable. • Inconsistent with RMA.
<i>TrustPower</i>	1059	<i>Support submission 284 ref. 20</i>		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
Fish and Game (Otago)	287	Support	Retain policy in its current form.	<ul style="list-style-type: none"> • Supports proposed policy.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 20</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 20</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & 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 & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 287 ref. 20</i>		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 287 ref. 20</i>		<ul style="list-style-type: none"> • Silver Fern Farms originally submitted against the deletion of the term "where appropriate" from policy 7.B.2/7.1 for reasons in the original submission, including inconsistency with the effects based nature of the RMA, and therefore opposes submissions supporting the deletion of the term.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 20</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Deer Industry New Zealand	293	Oppose	Support in part but believe the term "where appropriate" needs reinstatement to give greater scope to all available options for mitigation or remedial action.	<ul style="list-style-type: none"> • Still gives clear direction for preference of discharge. • Allows possibility for existing mitigation and post point source treatment of contaminants.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 293 ref. 20</i>		<ul style="list-style-type: none"> • Ensure policy realistic and achievable. • Inconsistent with RMA.
<i>TrustPower</i>	1059	<i>Support submission 293 ref. 20</i>		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
The Director-General of Conservation	306	Support	Retain as notified.	<ul style="list-style-type: none"> • Gives effect to best practice.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • No need for further restrictions on discharges.
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • No reason given.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 20</i>		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
<i>Hawkdun Station</i>	1053	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
<i>DF1 Ltd and DF3 Ltd, being</i>	1074	<i>Oppose</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate.

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 306 ref. 20</i>		<ul style="list-style-type: none"> • Does not take into account economic considerations.
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 20</i>		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Oppose	Strongly oppose deletion of 'where appropriate'.	<ul style="list-style-type: none"> • Not consistent with RMA - all relevant factors/effects to be balanced. • No recognition of other water values under NPS, particularly cleaning, dilution and disposal of waste. • Inconsistent with the NPS and RPS. • No lawful basis.
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 20</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 20</i>		<ul style="list-style-type: none"> • No reason given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 20</i>		<ul style="list-style-type: none"> • Ensure policy realistic and achievable. • Inconsistent with RMA.
<i>TrustPower</i>	1059	<i>Support submission 308 ref. 20</i>		<ul style="list-style-type: none"> • Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity. • Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 308 ref. 20</i>		<ul style="list-style-type: none"> • Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 20</i>		<ul style="list-style-type: none"> • Seek that the submission be allowed and the Plan Change amended as per the submission.
Central Otago District Council & Clutha District Council	309	Oppose	Strongly oppose deletion of 'where appropriate'.	<ul style="list-style-type: none"> • Not consistent with RMA - all relevant factors/effects to be balanced. • No recognition of other water values under NPS, particularly cleaning, dilution and disposal of waste. • Inconsistent with the NPS and RPS. • No lawful basis.
<i>Contact Energy Limited</i>	1013	<i>Support submission 309 ref. 20</i>		<ul style="list-style-type: none"> • Reasons stated in the submission.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 20</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 20</i>		<ul style="list-style-type: none"> • No reason given.
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 20</i>		<ul style="list-style-type: none"> • Support conclusion that section 32 inadequate and that plan change should be consistent with RMA, NPSFW and RPS.
<i>Federated Farmers of New</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> • Ensure policy realistic and achievable.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 309 ref. 20</i>		<ul style="list-style-type: none"> • <i>Inconsistent with RMA.</i>
<i>TrustPower</i>	1059	<i>Support submission 309 ref. 20</i>		<ul style="list-style-type: none"> • <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 309 ref. 20</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 20</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 20</i>		<ul style="list-style-type: none"> • <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>Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</i>
Glen Dene Limited	310	Oppose	Reinstate 'where appropriate'.	<ul style="list-style-type: none"> • Not consistent with RMA - all relevant factors/effects to be balanced. • No recognition of other water values under NPS, particularly cleaning, dilution and disposal of waste. • Inconsistent with the NPS and RPS. • No lawful basis.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 310 ref. 20</i>		<ul style="list-style-type: none"> • <i>Ensure policy realistic and achievable.</i> • <i>Inconsistent with RMA.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submission 310 ref. 20</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports the intent of submissions seeking to retain/re-instate the term.</i>
Ben Graham	311	Oppose	Reinstate 'where appropriate' or delete Policy 7.B.2.	<ul style="list-style-type: none"> • Not consistent with RMA - all relevant factors/effects to be balanced. • No recognition of other water values under NPS, particularly cleaning, dilution and disposal of waste. • Inconsistent with the NPS and RPS. • No lawful basis.
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
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 311 - 326 ref. 20</i>		<ul style="list-style-type: none"> • <i>Ensure policy realistic and achievable.</i> • <i>Inconsistent with RMA.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support submissions 311</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms originally submitted against the proposed change to policy 7.B.2/7.7.1 that deleted the term "where appropriate" and therefore supports</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		- 326 ref. 20		<i>the intent of submissions seeking to retain/re-instate the term.</i>
<i>TrustPower</i>	1059	<i>Support submission 323 ref. 20</i>		<ul style="list-style-type: none"> • <i>Unrealistic expectation to discharge to land in preference to water, for some activities such as hydroelectricity.</i> • <i>Supports either reinstatement of words "where appropriate", or recognition of exceptions such as hydroelectricity, or withdrawal of the Policy.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 20</i>		<ul style="list-style-type: none"> • <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>

21 Policy 7.B.3 / 7.7.2 - Considerations for discharge to land

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
The Cow Farm Limited	133	Oppose	Delete the policy.	<ul style="list-style-type: none"> • Vague and unclear, uses non-RMA terminology. • "Assimilate" open to interpretation, doesn't provide any guidance or measurable framework.
Clutha Agricultural Development Board	139	Amend	If the term "assimilate" is to be used, that a definition be included in the glossary.	<ul style="list-style-type: none"> • Not clear what assimilate means in context to having regard to ability of the land to assimilate discharges.
<i>Meridian Energy Limited</i>	1014	<i>Support in part submission 139 ref. 21</i>		<ul style="list-style-type: none"> • <i>Definitions should be included in a Glossary to reduce uncertainty for resource users.</i>
Dairy NZ Limited	146	Oppose	Delete the policy, or replace it with a policy that clearly specifies the water quality standard that must be met after the 'assimilative capacity' has been met.	<ul style="list-style-type: none"> • Term "assimilate" is not defined. • Contradicts approach of not relying on assimilative capacity. • Provides no greater guidance than RMA and RPS.
<i>Forest and Bird NZ</i>	1007	<i>Support in part submission 146 ref. 21</i>		<ul style="list-style-type: none"> • <i>Supports use of numerical standards, but not after "assimilative capacity has been met".</i> • <i>Opposes deletion of policy.</i>
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 146 ref. 21</i>		<ul style="list-style-type: none"> • <i>Support the use of numerical standards, but not after "assimilative capacity has been met.</i> • <i>Oppose deletion of the Policy.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 146 ref. 21</i>		<i>Supports Policy as matters are relevant considerations.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 146 ref. 21</i>		<ul style="list-style-type: none"> • <i>The discharge of contaminants to land is supported.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 21</i>		<ul style="list-style-type: none"> • <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
Dairy Holdings Limited	195	Oppose	In part opposes policy. Ask that the policy be deleted, or in the alternative, it is necessary to define assimilative capacity and better clarify its role in the plan.	<ul style="list-style-type: none"> • "Assimilate" not defined. • Some regard should be had to assimilative capacity. • Provides little guidance additional to that in RMA and other plans.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 21</i>		<ul style="list-style-type: none"> • <i>Submission outlines concern of further submitter.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195</i>		<ul style="list-style-type: none"> • <i>Support in part, particularly regarding wider effect of the plan change.</i> • <i>Although it doesn't request total withdrawal the submission recognises lack of</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 21</i>		<i>specificity of controls and concern for lack of evidence supporting discharge limits, particularly given reliance on prohibited activity status.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 21</i>		<ul style="list-style-type: none"> • Clarification required to references of 'good quality water' and 'natural and human use values'. • Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	That Policy 7.B.2 be retained as currently drafted.	<ul style="list-style-type: none"> • Supports policy.
<i>TrustPower</i>	1059	<i>Support submission 197 ref. 21</i>		<i>Supports Policy as matters are relevant considerations.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 21</i>		<ul style="list-style-type: none"> • 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. 21</i>		<ul style="list-style-type: none"> • Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Trustpower Limited	206	Support	Adopt the policy as proposed.	<ul style="list-style-type: none"> • The matters are relevant and important.
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> • No reason given.
Fonterra Co-operative Group Limited	241	Oppose	Delete the policy, or replace it with a policy that clearly specifies the water quality standard that must be met after the 'assimilative capacity' has been met.	<ul style="list-style-type: none"> • Term "assimilate" not defined. • Contradicts approach of not relying on assimilative capacity. • Provides no greater guidance than RMA and RPS.
<i>TrustPower</i>	1059	<i>Oppose submission 241 ref. 21</i>		<i>Supports Policy as matters are relevant considerations.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 241 ref. 21</i>		<ul style="list-style-type: none"> • The discharge of contaminants to land is supported.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 21</i>		<ul style="list-style-type: none"> • Consistent with relief sought by further submitter.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Introduce greater flexibility in relation to the timeframes set out in Policy 7.B.3.	<ul style="list-style-type: none"> • Largely support policy. • Need to avoid disproportionate costs on land managers, and to provide flexibility in order to give effect to the NPSFW 2030 deadline.
Environmental Defence Society	267	Amend	Amend the policy so that it applies to applications for discharges and lists actual or potential effects on aquatic ecosystems and indigenous species as other factors to have regard to.	<ul style="list-style-type: none"> • ORC has function to maintain indigenous biodiversity. Needs to consider related matters when deciding if discharge is appropriate.
<i>Forest and Bird NZ</i>	1007	<i>Support submission 267 ref. 21</i>		<ul style="list-style-type: none"> • ORC has a function to maintain indigenous biodiversity and this should be a matter for consideration.
<i>Mr RJ Borst</i>	1034	<i>Oppose in part submission 267 ref. 21</i>		<ul style="list-style-type: none"> • Oppose suggestion all applications for resource consent should be publicly notified.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 21</i>		<i>Supports Policy as matters are relevant considerations.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 21</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. 21</i>		<i>• Inconsistent with relief sought by further submitter.</i>
<i>Horticulture New Zealand</i>	269	<i>Support</i>	<i>Retain Policy 7.B.3</i>	<i>• Recognises the assimilative capacity of land.</i>
<i>TrustPower</i>	1059	<i>Support submission 269 ref. 21</i>		<i>Supports Policy as matters are relevant considerations.</i>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 21</i>		<i>• Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.</i>
<i>Forest and Bird</i>	271	<i>Support</i>	<i>Retain Policy as publicly notified.</i>	<i>• Supports policy.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 21</i>		<i>• Not all waterways need to be enhanced. • Background data required before any agricultural activities are restricted.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 21</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>TrustPower</i>	1059	<i>Support submission 271 ref. 21</i>		<i>Supports Policy as matters are relevant considerations.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 21</i>		<ul style="list-style-type: none"> • <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 21</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Fish and Game (Central South Island)	273	Amend	include: "(d) Cumulative effects."	<ul style="list-style-type: none"> • <i>Supports policy with addition of new matter acknowledging cumulative effects.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 21</i>		<ul style="list-style-type: none"> • <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 273 ref. 21</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 273 ref. 21</i>		<ul style="list-style-type: none"> • <i>Adds difficulties to landowners achieving standard and for Council monitoring and enforcement.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 21</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Fish and Game (Otago)	287	Amend	Would like another "and" criterion at (d): "(d) Cumulative effects."	<ul style="list-style-type: none"> • Support policy with addition of new matter acknowledging cumulative effects. • Deals with cumulative effects.
<i>The Director-General of Conservation</i>	1011	Support submission 287 ref. 21		
<i>Craiglea Limited</i>	1012	Oppose submission 287 ref. 21		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
<i>Mr RJ Borst</i>	1034	Oppose submission 287 ref. 21		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 287 ref. 21		<ul style="list-style-type: none"> • Difficult to manage. • Unreasonable for one farmer to be accountable for all issues in catchment.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 287 ref. 21		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
The Director-General of Conservation	306	Amend	Retain as notified with (c) amended to read as follows, or to like effect: Actual or potential effects on water bodies and where appropriate coastal water.	<ul style="list-style-type: none"> • Gives effect to best practice and the NZCPS 2010.
<i>Craiglea Limited</i>	1012	Oppose submission 306 ref. 21		<ul style="list-style-type: none"> • No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • No need for further restrictions on discharges.
<i>Hopefield Investments Ltd</i>	1019	Oppose submission 306 ref. 21		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	Oppose submission 306		<ul style="list-style-type: none"> • No reason given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 21</i>		
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 21</i>		<ul style="list-style-type: none"> • <i>Changes sought are 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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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>Moutere Station Limited</i>	<i>1052</i>	<i>Oppose submission 306 ref. 21</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i> • <i>Changes sought are vague, unclear and open-ended.</i>
<i>Hawkdun Station</i>	<i>1053</i>	<i>Oppose submission 306 ref. 21</i>		<ul style="list-style-type: none"> • <i>Changes sought are vague, unclear and open-ended.</i>
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 306 ref. 21</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose submission 306 ref. 21</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Greenfield Rural Opportunities Limited</i>	<i>1077</i>	<i>Oppose submission 306 ref. 21</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>

22 Policy 7.B.4 - Adaptive management and innovation

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alan McMillan	104	Amend	"Encourage" should be replaced with "enforce" or similar.	<ul style="list-style-type: none"> • "Encourage" far too soft.
<i>Otago Fish and Game Council</i>	1027	<i>Support submission 104 ref. 22</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 104 ref. 22</i>		<ul style="list-style-type: none"> • <i>Can't enforce 'innovation'.</i> • <i>Existing wording more appropriate.</i>
The Cow Farm Limited	133	Amend	Support with amendments.	<ul style="list-style-type: none"> • As a dairy farmer, constantly looking for technology and management tools to improve farming systems. • Policy unclear, uses terminology not defined and open to interpretation.
Clutha Agricultural Development Board	139	Amend	Use term "Best Management Practices" instead of "technology or innovative practices".	<ul style="list-style-type: none"> • Match industry terminology and use commonly accepted terms. • Have consistency of terminology through out the plan change.
Dairy NZ Limited	146	Amend	Delete or change the policy to provide a clearer framework for encouraging activities that would reduce adverse effects on water quality. For example: "Encourage activities that: would reduce the adverse effects of land use and discharges on water quality and would be consistent with the achievement of the standards specified in Schedule 15."	<ul style="list-style-type: none"> • Provide clarity on what should be encouraged. • Term "adaptive management" not defined. • Meaning of term "reduce the discharge" not clear. • Needs to complement objective to achieve water quality targets.
<i>TrustPower</i>	1059	<i>Oppose submission 146 ref. 22</i>		<ul style="list-style-type: none"> • <i>Supports adaptive management and innovation being provided.</i> • <i>Important considerations to environmental management.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 22</i>		<ul style="list-style-type: none"> • <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
Ernslaw One Ltd	149	Support	Retain current wording.	<ul style="list-style-type: none"> • Forestry sector already undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects.
<i>TrustPower</i>	1059	<i>Support submission 149 ref. 22</i>		<ul style="list-style-type: none"> • <i>Supports adaptive management and innovation being provided.</i> • <i>Important considerations to environmental management.</i>
Dairy Holdings Limited	195	Amend	In part supports policy - although to the extent of the concerns outlined [below] the policy is opposed. The policy needs to be reworded to encourage activities that result in a reduction of nutrients to achieve the standards set out in Schedule 15. The policy needs to be redrafted to better define when and what circumstances an adaptive management approach will be appropriate - and what exactly such an approach will look like.	<ul style="list-style-type: none"> • Supports adaptive management, but concept not well articulated in plan change. • Unclear meaning of "reduce the discharge". • Emphasis on reducing impact of contaminants needs to be complementary to objective of achieving water quality targets.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 22</i>		<ul style="list-style-type: none"> • <i>Submission outlines concern of further submitter.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 22</i>		<ul style="list-style-type: none"> • <i>Support in part, particularly regarding wider effect of the plan change.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 22</i>		<ul style="list-style-type: none"> • <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i> • <i>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</i>

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	That Policy 7.B.4 be redrafted as follows: "Encourage adaptive management, innovation, benchmarking and industry best practice to reduce the discharge and impacts of contaminants on water quality." "Advice Note: The key requirements of adaptive management are: - Baseline knowledge - Evaluation criteria that trigger the adaptive management process - Appropriate reaction to ensure compliance with the discharge limits - Further monitoring."	<ul style="list-style-type: none"> To strengthen policy. Appropriate to provide guidance on "adaptive management".
Contact Energy Limited	1013	Support in part submission 197 ref. 22		<ul style="list-style-type: none"> The suggested advice note would add clarity in the application of the proposed policy.
Horticulture New Zealand	1032	Support in part submission 197 ref. 22		<ul style="list-style-type: none"> Appropriate to give guidance on adaptive management.
Glenshee Station Limited	1062	Oppose submission 197 ref. 22		<ul style="list-style-type: none"> 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. 22		<ul style="list-style-type: none"> Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Trustpower Limited	206	Support	Adopt the proposed policy.	<ul style="list-style-type: none"> Adaptive management and innovation supported.
Blakely Pacific Limited	209	Support	Retain current wording.	<ul style="list-style-type: none"> Forestry sector undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose in part submission 209 ref. 22		<ul style="list-style-type: none"> Inconsistent with relief sought by further submitter.
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> No reason given.
Fulton Hogan Limited	222	Amend	Redraft as: "Encourage adaptive management and innovation to improve the quality of the discharge."	<ul style="list-style-type: none"> Wording unclear and gives little direction to subsequent methods or consent applicants.
TrustPower	1059	Support submission 222 ref. 22		<ul style="list-style-type: none"> Supports adaptive management and innovation being provided. Important considerations to environmental management.
Holcim (New Zealand) Limited	224	Amend	Redraft as "Encourage adaptive management and innovation to improve the quality of the discharge."	<ul style="list-style-type: none"> Current wording unclear. Gives little direction to subsequent methods or consent applicants.
TrustPower	1059	Support submission 224 ref. 22		<ul style="list-style-type: none"> Supports adaptive management and innovation being provided. Important considerations to environmental management.
Fonterra Co-operative Group Limited	241	Amend	Delete or change the policy to provide a clearer framework for encouraging activities that would reduce adverse effects on water quality. For example: "Encourage activities that: would reduce the adverse effects of land use and discharges on water quality and would be consistent with the achievement of the standards specified in Schedule 15."	<ul style="list-style-type: none"> Provide clarity on what should be encouraged. Term "adaptive management" not defined. Meaning of term "reduce the discharge" not clear. Needs to complement objective to achieve water quality targets.
TrustPower	1059	Oppose submission 241 ref. 22		<ul style="list-style-type: none"> Supports adaptive management and innovation being provided. Important considerations to environmental management.
DF1 Ltd and DF3 Ltd, being	1074	Support in part		<ul style="list-style-type: none"> Consistent with relief sought by further submitter.

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 241 ref. 22</i>		
Ravensdown Fertiliser Co-operative Ltd	248	Support	Supports the intent of Policy 7.B.4 as it is currently written.	• Policy is overall enabling and proactive.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submissions 248 and 252 ref. 22</i>		• <i>No reason given.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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>Support submissions 248 and 252 ref. 22</i>		• <i>Supports adaptive management and innovation being provided.</i> • <i>Important considerations to environmental management.</i>
Rayonier New Zealand Ltd	256	Support	Retain current wording.	• Forestry sector already undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects. • Policy is overall enabling and proactive.
Ballance Agri-Nutrients Ltd	262	Support	Supports the intent of Policy 7.B.4 as it is currently written.	• Policy is overall enabling and proactive.
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 262 ref. 22</i>		• <i>No reason stated.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & Mrs RE Gardner</i>	<i>1044</i>			
<i>Mr AWB Elliot</i>	<i>1045</i>			

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 & 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	Support submission 262 ref. 22		<ul style="list-style-type: none"> • Supports adaptive management and innovation being provided. • Important considerations to environmental management.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Introduce greater flexibility in relation to the timeframes set out in Policy 7.B.4.	<ul style="list-style-type: none"> • Largely support policy. • Need to avoid disproportionate costs on land managers, and to provide flexibility in order to give effect to the NPSFW 2030 deadline.
Colin Scurr	268	Support	Support.	<ul style="list-style-type: none"> • Methods to provide encouragement should be specified.
Horticulture New Zealand	269	Amend	Amend Policy 7.B.4 as follows: "Promote the use of best management practices, including audited self-management programmes and codes of practice to reduce the actual or potential adverse effects on water bodies".	<ul style="list-style-type: none"> • Unclear what adaptive management means.
<i>Etrick Fruitgrowers Association Inc</i>	1067	Support submission 269 ref. 22		<ul style="list-style-type: none"> • Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities. • Support dumping "adaptive management" and adopt "best management practices".
Marc Schallenberg	270	Amend	If an adaptive management strategy is to be employed, then sufficient monitoring and the use of precautionary principle should also be adopted to ensure that severe impairment of water quality does not occur. The use of the precautionary principle should be reflected in the targets/thresholds set out in Tables 15.2 and 16.	<ul style="list-style-type: none"> • Adaptive monitoring is evolutionary process that starts with precautionary approach and depends on robust monitoring. • Targets and timelines should be set to protect against shortcomings of an initially inadequate knowledge base.
<i>Contact Energy Limited</i>	1013	Oppose submission 270 ref. 22		<ul style="list-style-type: none"> • No necessary connection between adaptive management strategy and excessive caution: the availability of adaptive management strategies may indicate a need for less rather than more caution.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 270 ref. 22		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Forest and Bird	271	Support	Retain Policy as publicly notified and add definition of adaptive management to the Glossary:	<ul style="list-style-type: none"> • "Adaptive management" should be defined to include rigorous monitoring. • Definition will help plan users to understand Policy.
<i>The Director-General of Conservation</i>	1011	Support submission 271 ref. 22		<ul style="list-style-type: none"> • Gives effect to RMA.
<i>Craiglea Limited</i>	1012	Oppose submission 271 ref. 22		<ul style="list-style-type: none"> • Not all waterways need to be enhanced.
<i>Meridian Energy Limited</i>	1014	Support in part submission 271 ref. 22		<ul style="list-style-type: none"> • Definitions should be included in a Glossary to reduce uncertainty for resource users.
<i>Mr RJ Borst</i>	1034	Oppose submission 271 ref. 22		<ul style="list-style-type: none"> • Not all waterways need to be enhanced.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 271 ref. 22</i>		<ul style="list-style-type: none"> • <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 22</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Federated Farmers of New Zealand	278	Support	Adopt Policy 7.B.4 as proposed.	<ul style="list-style-type: none"> • <i>Facilitates on-going learning throughout the process.</i> • <i>Enables ORC and plan users to learn more about the impact of contaminants and ensure better long-term results.</i>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 22</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 22</i>		<ul style="list-style-type: none"> • <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. 22</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 22</i>		<ul style="list-style-type: none"> • <i>Supports adaptive management and innovation being provided.</i> • <i>Important considerations to environmental management.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 22</i>		<ul style="list-style-type: none"> • <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. 22</i>		<ul style="list-style-type: none"> • <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>
Wenita Forest Products	279	Support	Retain current wording.	<ul style="list-style-type: none"> • <i>Forestry sector already undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Calder Stewart Industries Limited</i>	1049	Support submission 279 ref. 22		<ul style="list-style-type: none"> • Agree with submission in relation to Objectives and policies. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.
<i>TrustPower</i>	1059	Support submission 279 ref. 22		<ul style="list-style-type: none"> • Supports adaptive management and innovation being provided. • Important considerations to environmental management.
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Support	Support policy.	<ul style="list-style-type: none"> • Forestry sector already undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects.
<i>Calder Stewart Industries Limited</i>	1049	Support submission 282 ref. 22		<ul style="list-style-type: none"> • Plan change should recognise the specific nature of plantation forestry. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.
<i>TrustPower</i>	1059	Support submission 282 ref. 22		<ul style="list-style-type: none"> • Supports adaptive management and innovation being provided. • Important considerations to environmental management.
City Forests Limited	283	Support	Retain current wording.	<ul style="list-style-type: none"> • Forestry sector already undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects.
<i>Calder Stewart Industries Limited</i>	1049	Support submission 283 ref. 22		<ul style="list-style-type: none"> • Agree with submission in relation to Objectives and policies. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.
<i>TrustPower</i>	1059	Support submission 283 ref. 22		<ul style="list-style-type: none"> • Supports adaptive management and innovation being provided. • Important considerations to environmental management.
Fish and Game (Otago)	287	Amend	Better wording would be: "Where avoidance is not possible, encourage adaptive management and innovation to reduce the discharge and impact of contaminants on water quality."	<ul style="list-style-type: none"> • Qualify in relation to Policy 7.B.1, where test is "avoid".
<i>Craiglea Limited</i>	1012	Oppose submission 287 ref. 22		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
<i>Mr RJ Borst</i>	1034	Oppose submission 287 ref. 22		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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
<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. 22</i>		<ul style="list-style-type: none"> • <i>Not necessary to put avoidance ahead of encouraging.</i> • <i>Existing wording more appropriate.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 287 ref. 22</i>		<ul style="list-style-type: none"> • <i>Supports adaptive management and innovation being provided.</i> • <i>Important considerations to environmental management.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 22</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Southern Wood Council	289	Support	Retain current wording.	<ul style="list-style-type: none"> • Forestry sector already undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects.
<i>TrustPower</i>	1059	<i>Support submission 289 ref. 22</i>		<ul style="list-style-type: none"> • <i>Supports adaptive management and innovation being provided.</i> • <i>Important considerations to environmental management.</i>
Deer Industry New Zealand	293	Support	Support.	<ul style="list-style-type: none"> • This principle an inherent part of deer industry's philosophy re water quality and commitments under the RMA. • Basic tenant of encouragement for innovation in the industry's Landcare Manual approach and QA systems.
<i>TrustPower</i>	1059	<i>Support submission 293 ref. 22</i>		<ul style="list-style-type: none"> • <i>Supports adaptive management and innovation being provided.</i> • <i>Important considerations to environmental management.</i>
The Director-General of Conservation	306	Amend	That 7.B.4 be amended as follows, or to like effect: "Encourage adaptive management and innovation to reduce the discharge and adverse effects of contaminants on water quality."	<ul style="list-style-type: none"> • RMA terminology is "adverse effects", not "impact".
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 22</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 22</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 22</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 22</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & 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
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. 22		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 22		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
TrustPower	1059	Support submission 306 ref. 22		<ul style="list-style-type: none"> • Supports adaptive management and innovation being provided. • Important considerations to environmental management.
Glenshee Station Limited	1062	Oppose submission 306 ref. 22		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 22		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 22		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Glen Dene Limited	310	Support	Methods to provide encouragement (as compared to sanctions) should be specified.	<ul style="list-style-type: none"> • Techniques and innovations that reduce adverse effects on water quality should be encouraged.
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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
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>TrustPower</i>	1059	<i>Support submission 323 ref. 22</i>		<ul style="list-style-type: none"> • Supports adaptive management and innovation being provided. • Important considerations to environmental management.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 22</i>		<ul style="list-style-type: none"> • 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.

23 Policy 7.B.5 - Intercatchment water discharge

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	That Policy 7.B.5 be redrafted as follows: Recognise and reflect tangata whenua cultural values when freshwater is discharged from one catchment to another, and when contaminants are discharged to freshwater or to land where it may enter freshwater.	<ul style="list-style-type: none"> • Policy inconsistent with NPSFW, objective D1 and policy D1 infer ORC needs to act to engage with Nga Runanga. • Giving effect to NPSFW requires recognising tangata whenua cultural values and interests and reflecting them in freshwater management, engaging tangata whenua in management and decision making on freshwater.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 23</i>		<ul style="list-style-type: none"> • The word "reflect" is too absolute. • Reference to "freshwater" is opposed as the proposed plan change should protect public water bodies only.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 23</i>		<ul style="list-style-type: none"> • 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. 23</i>		<ul style="list-style-type: none"> • Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Trustpower Limited	206	Amend	That the wording of this proposed policy is amended and/or explanatory text is added so that it is clear which cultural values are affected by the mixing of water, and the methods that need to be employed in order to provide for or to mitigate these effects.	<ul style="list-style-type: none"> • Needs greater guidance. • Identify values affected by mixing of water. • Identify methods that applicants would need to adopt.
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 23</i>		<ul style="list-style-type: none"> • Greater certainty needed about which cultural values are being managed, and the methods that applicants would need to adopt.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 206 ref. 23</i>		<ul style="list-style-type: none"> • The cultural values affected by the mixing of water and the mitigation methods will vary between freshwater bodies.
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> • No reason given.
Horticulture New Zealand	269	Oppose	Delete Policy 7.B.5.	<ul style="list-style-type: none"> • More appropriate in chapter on water quantity.
<i>TrustPower</i>	1059	<i>Support submission 269 ref. 23</i>		<ul style="list-style-type: none"> • Wording of Policy should be amended and/or explanatory text should be added. • Cultural values affected by the mixing of water should be clearly identified. • Methods to provide for or to mitigate effects should be stated. • Alternatively, Policy should be withdrawn.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Etrick Fruitgrowers Association Inc</i>	1067	Support submission 269 ref. 23		• Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.
Forest and Bird	271	Amend	Amend to read: "7.B.5 Recognise the values of Iwi, biodiversity values and biosecurity matters when water is discharged from one catchment to another."	• Risk of introduction of pests, weeds, fish and invertebrate species.
<i>The Director-General of Conservation</i>	1011	Support submission 271 ref. 23		• Gives effect to RMA.
<i>Craiglea Limited</i>	1012	Oppose submission 271 ref. 23		• Not all waterways need to be enhanced.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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	Oppose submission 271 ref. 23		<ul style="list-style-type: none"> • Wording of Policy should be amended and/or explanatory text should be added. • Cultural values affected by the mixing of water should be clearly identified. • Methods to provide for or to mitigate effects should be stated. • Alternatively, Policy should be withdrawn.
<i>Glenshee Station Limited</i>	1062	Oppose submission 271 ref. 23		• 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 271 ref. 23		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Fish and Game (Central South Island)	273	Amend	The addition of the following policy to give effect to this concern: "7.B.5 Recognise the values of freshwater fish when water is transferred between catchments". In the alternative such other relief that gives effect to concerns	•Concerns about disease and effects on fish genetics of mixing water.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			regarding the risks of transference of water between catchments.	
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 23</i>		<ul style="list-style-type: none"> • <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 273 ref. 23</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 273 ref. 23</i>		<i>Inappropriately selective.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 23</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Fish and Game (Otago)	287	Support	Retain the policy.	<ul style="list-style-type: none"> • Recognition of Ngai Tahu values welcome and necessary.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 23</i>		<ul style="list-style-type: none"> • <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. 23</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & 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			
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 287 ref. 23		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
The Director-General of Conservation	306	Amend	That 7.B.5 be amended as follows, or to like effect: "Recognise both lwi and biodiversity values when water is discharged from one catchment to another."	<ul style="list-style-type: none"> • To avoid potential hybridisation of threatened species of indigenous fish biodiversity values, such as genetic integrity need recognising.
Craiglea Limited	1012	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • No need for further restrictions on discharges.
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • 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.
Strath Taieri Community Board	1029	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • No reason given.
Mr RJ Borst	1034	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
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. 23		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to
Hawkdun Station	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<p>determine enhancement.</p> <ul style="list-style-type: none"> • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • Inappropriately selective.
TrustPower	1059	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • Wording of Policy should be amended and/or explanatory text should be added. • Cultural values affected by the mixing of water should be clearly identified. • Methods to provide for or to mitigate effects should be stated. • Alternatively, Policy should be withdrawn.
Glenshee Station Limited	1062	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Support submission 306 ref. 23		<ul style="list-style-type: none"> • Protects habitats and the wider needs of mahika kai, taoka species and other species of importance to Kai Tahu ki Otago.
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • Opposed biodiversity values inclusion unless social and economic benefits are also to be factors. • Farming and infrastructure in northern Maniototo is reliant upon supply from the Mt Ida Water Race.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 23		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.

24 Section 7.6 - Policies for the enhancement of water quality

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Fish and Game (Central South Island)	273	Oppose	Retain.	<ul style="list-style-type: none"> • In most cases, water quality has not improved in these catchments.
Craiglea Limited	1012	Oppose submission 273 ref. 24		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 24</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 273 ref. 24</i>		<i>Requires a change in direction of the Proposed Plan.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 24</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Fish and Game (Otago)	287	Oppose	Oppose removal from this plan change without evidence that the water quality has improved in these catchments.	<ul style="list-style-type: none"> • <i>What planning purpose is there in setting goals only to remove them in later plan changes?</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 24</i>		<ul style="list-style-type: none"> • <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>Contact Energy Limited</i>	1013	<i>Oppose in part submission 287 ref. 24</i>		<ul style="list-style-type: none"> • <i>The former policy 7.6.4 is a transitional policy intended to be put in place until the proposed limit setting policies are implemented.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 24</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 24</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>

29 Section 7.7 - Policies for point source discharges

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Silver Fern Farms Limited	238	Oppose	Reinstate all policies for point source discharges. Support retention for the provision of mixing zones in point source discharge policy 7.7.6. Silver Fern Farms would like the provision for mixing zones retained and ensure that the values of industry (and the investment made in industry) are given appropriate recognition pursuant to the NPSFW. However, other parts of Plan Change 6A provide an internal inconsistency with the overall Plan that needs to be rectified.	<ul style="list-style-type: none"> • Removes provision for point source discharge. • Changes all discharges to diffuse to land. • Policy 7.7.6 consistent with NPSFW. • Inconsistency in plan change re mixing zones.
<i>Isa Holdings Ltd</i>	1058	<i>Support in part submission 238 ref. 29</i>		<i>Supports mixing zones being included in the plan.</i>

30 Section 7.C - Policies for discharges of human sewage, hazardous substances, hazardous wastes, stormwater and other specified contaminants, and discharges from industrial and trade premises

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alan McMillan	104	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Changes to this section overdue. Lindsay Creek, Waters of Leith and Kaikorai Stream have all suffered in past.
Ernslaw One Ltd	149	Not Applicable	Amendment to policies as may be required to support relief requested below for rules in Chapter 12.	<ul style="list-style-type: none"> • Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.
North Otago Irrigation Company	260	Not Applicable	Supports 7C policies.	<ul style="list-style-type: none"> • No reason given.
<i>John Webster</i>	1063	<i>Support submission 260 ref. 30</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. 30</i>		<i>• Support the NOIC submission in full.</i>
Horticulture New Zealand	269	Not Applicable	Include a Policy in 7C as follows: "To provide for the use of hazardous substances in primary production which avoid remedy or mitigate adverse effects on water quality".	<ul style="list-style-type: none"> • No specific policy framework to provide for discharges of named substances as permitted activities. • Hazardous substances include use of fertilisers and agrichemicals in primary production, which is a non-point source discharge. Needs to be provided for in

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				the Plan.
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 30</i>		<ul style="list-style-type: none"> Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.

31 Policy 7.7.5 - Assimilative capacity

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Donald Scott	30	Oppose	Oppose the deletion of 7.7.5.	<ul style="list-style-type: none"> Ignores the interrelation of quality and quantity Removing water for irrigation increases vulnerability to water quality. Small streams more vulnerable. Best use of available resources. Actual or potential effects on water quality. Sensitivity of receiving environment.
Dairy NZ Limited	146	Did not specify	No decision requested.	<ul style="list-style-type: none"> Deleting 7.7.5 but not 7.7.6 appears contradictory.
Grant Isbister	151	Oppose	Retain mixing zones to dilute contaminants.	<ul style="list-style-type: none"> Restrict testing to larger waterways, e.g. fast flowing streams, rather than slow moving farm ditches.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 151 ref. 31</i>		<ul style="list-style-type: none"> <i>Silver Fern Farms opposes the removal of provisions for mixing zones/ reasonable mixing and therefore supports those submissions with the intent of retaining those provisions.</i> <i>Neutral on other aspects of the submission.</i>
Silver Fern Farms Limited	238	Amend	Would like the provision for mixing zones retained and ensure that the values of industry (and the investment made in industry) are given appropriate recognition pursuant to the NPSFW.	<ul style="list-style-type: none"> PC6A does not give effect to NPSFW. Cleaning, dilution and disposal of waste listed as national value in NPSFW. Removing mixing zones inconsistent with provision for dilution. PC6A has no certainty for investment.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 238 ref. 31</i>		<ul style="list-style-type: none"> <i>For the reasons given by the submitter.</i>
<i>Isa Holdings Ltd</i>	1058	<i>Support in part submission 238 ref. 31</i>		<ul style="list-style-type: none"> <i>Supports mixing zones being included in the plan.</i>
Fonterra Co-operative Group Limited	241	Did not specify	No decisions requested.	<ul style="list-style-type: none"> Deleting 7.7.5 but not 7.7.6 appears contradictory.
Fish and Game (Central South Island)	273	Oppose	Retain Objective 7.7.5; renumber to include in Objective Section 7B.	<ul style="list-style-type: none"> Clear guidance needed as to the matters to be considered when assessing resource consents.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 31</i>		<ul style="list-style-type: none"> <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 273 ref. 31</i>		<ul style="list-style-type: none"> <i>Overly restrictive and disproportionate.</i> <i>Does not take into account economic considerations.</i>
Oceana Gold (New Zealand) Limited	285	Oppose	That there be an acknowledgement that in some circumstances reasonable mixing zones are appropriate for the assimilation and/or dilution of specific contaminants.	<ul style="list-style-type: none"> Concerned the proposal to remove reasonable mixing zones for farming related discharges, may later be extended to every contaminant from every site.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 285 ref. 31</i>		<ul style="list-style-type: none"> <i>Silver Fern Farms opposes the removal of provisions for mixing zones/ reasonable mixing and therefore supports those submissions with the intent of retaining those provisions.</i> <i>Neutral on other aspects of the submission.</i>
Paterson Pitts Partners Ltd	288	Oppose	Oppose.	<ul style="list-style-type: none"> "Reasonable mixing" removed from plan as it applies to discharge from land disturbance (e.g. subdivisions), where effects short term and treatment to

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> comply with standards impractical. "reasonable mixing" does bring with it cumulative effect issues, but these can be managed through consenting process. Provided for in RMA Ss 70 & 107, so may be unlawful to remove.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 288 ref. 31</i>		<ul style="list-style-type: none"> <i>Silver Fern Farms opposes the removal of provisions for mixing zones/ reasonable mixing and therefore supports those submissions with the intent of retaining those provisions.</i> <i>Neutral on other aspects of the submission.</i>

34 Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding ...etc)

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Dairy NZ Limited	146	Amend	<p>Specific policies are needed to provide the necessary framework for appropriate permitted and prohibited activities.</p> <p>Delete the policies [7.D.1 - 7.D.3] or change them significantly to:</p> <p>(a) recognise that it is not appropriate to apply discharge quality standards on all discharges at the point of discharge.</p> <p>(b) remove terms that introduce a high level of uncertainty such as "limited time period", "minimise the discharge" "expeditious" and "innovative practices".</p>	<ul style="list-style-type: none"> Needs specific, clearer policy framework for permitted and prohibited activities to meet intent of PPC6A. Does not provide certainty or framework for rules and resource consents. Potential consequences for current and future discharges. Inappropriate to provide significant discretion to consent authority. Consideration of reasonable mixing still required under RMA for discharge permit application. More appropriate to provide guidance on reasonable mixing so issue doesn't need debating from first principles for each consent application.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 146 ref. 34</i>		<ul style="list-style-type: none"> <i>Appropriate that standards apply to all discharges at point of discharge.</i>
<i>Contact Energy Limited</i>	1013	<i>Support in part submission 146 ref. 34</i>		<ul style="list-style-type: none"> <i>Policies in section 7.D should recognise that it is not appropriate to apply discharge quality standards on all discharges at the point of discharge.</i> <i>It may be appropriate to consider the effect of discharges after reasonable mixing.</i>
<i>Otago Fish and Game Council</i>	1027	<i>Neither support nor oppose submission 146 ref. 34</i>		<ul style="list-style-type: none"> <i>Appropriate that standards apply to all discharges at point of discharge</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 146 ref. 34</i>		<ul style="list-style-type: none"> <i>Need for clarity.</i>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 146 ref. 34</i>		<ul style="list-style-type: none"> <i>Appropriate that standards apply to all discharges at point of discharge.</i> <i>Difficulties identified by Dairy NZ can be overcome.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 146 ref. 34</i>		<ul style="list-style-type: none"> <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 34</i>		<ul style="list-style-type: none"> <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. 34</i>		<ul style="list-style-type: none"> <i>Activities should only be prohibited where they are likely to result in significant 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>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ernslaw One Ltd	149	Amend	Amendment to policies as may be required to support relief requested below for rules in Chapter 12.	<ul style="list-style-type: none"> • Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.
Mitchell & Webster Ltd	186	Amend	Support the improvement of water quality in water discharges but with realistic and achievable levels which are based on scientific research for the environment the water discharges are occurring in.	<ul style="list-style-type: none"> • Levels in plan not realistically achievable - even with best farm practices.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 186 ref. 34</i>		<ul style="list-style-type: none"> • <i>Even with best practice limits and levels not achievable.</i>
Dairy Holdings Limited	195	Amend	<p>Opposes policies 7.D.1 - 7.D.3 and asks they be deleted.</p> <p>In the alternative, the policies need to be amended significantly to adopt the catchment/water body approach [prefers the setting of catchment/water body load limits (via a total concentration limit) rather than controls of non-point source (or diffuse) pollution].</p> <p>It also needs to be recognised that: - it is not appropriate to apply discharge quality standards on all discharges at the point of discharge; - terms that introduce a high level of uncertainty such as "limited time period", "about to enter water", "minimise the discharge", "expeditious" and "innovative practices" need to be defined or deleted.</p> <p>Specific policies are needed to provide the necessary framework for appropriate permitted and prohibited activities.</p>	<ul style="list-style-type: none"> • Unclear, uncertain, don't provide guidance on when objectives will be achieved, or a framework for rules. • Policies not clear, provide little useful direction to implement plan change or when consent is needed. • 7.D.1 of significant concern. Controls on diffuse pollution not practicable for all discharges. Catchment/water body limits are preferred. • Impracticable, onerous and costly. • 'No mixing' approach contrary to section 107 RMA, fails to give effect to RPS policy 6.5.5(c). • Existing framework woefully inadequate.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 34</i>		<ul style="list-style-type: none"> • <i>Submission outlines concern of further submitter.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 195 ref. 34</i>		<ul style="list-style-type: none"> • <i>Concern with limits and timeframes.</i> • <i>Inconsistent with RMA s5.</i> • <i>Time bound provision unclear.</i> • <i>Lack of guidance on how to comply.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 34</i>		<ul style="list-style-type: none"> • <i>Support in part, particularly regarding wider effect of the plan change.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 34</i>		<ul style="list-style-type: none"> • <i>Clarification required to references of 'good quality water' and 'natural and human use values'.</i> • <i>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</i>
Vivienne & Greg Kerr	213	Support	Support.	<ul style="list-style-type: none"> • No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 213 ref. 34</i>		<ul style="list-style-type: none"> • <i>Due to uncertainty surrounding application of the discharge rules and inconsistencies within the plan, between the plan and RMA, and NPSFW, Silver Fern Farms opposes the adoption of section 7.D policies in their current form and as such opposes submissions in support of those policies without bias.</i>
Silver Fern Farms Limited	238	Amend	This internal inconsistency with the Plan [definition of animal waste system] needs to be rectified.	<ul style="list-style-type: none"> • Animal waste definition includes our consented discharge. • Limits applied stricter than currently consented. • Section 12C essentially prohibits discharges. • Should not have been made effective immediately.
Fonterra Co-operative Group	241	Amend	Specific policies are needed to provide the necessary framework	<ul style="list-style-type: none"> • Needs specific, clearer policy framework for permitted and prohibited activities

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Limited			for appropriate permitted and prohibited activities.	to meet intent of PPC6A.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 241 ref. 34</i>		• <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 34</i>		• <i>Consistent with relief sought by further submitter.</i>
North Otago Irrigation Company	260	Amend	Supports 7D subject to: i) The changes to Schedule 16 discharge limits requested by these submissions, and ii) Amendment to Policy 7.D.3 to read 'provide for the consenting of discharges where;...'	• No reason given.
<i>John Webster</i>	1063	<i>Support submission 260 ref. 34</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. 34</i>		• <i>Support the NOIC submission in full.</i>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Introduce greater flexibility in relation to the timeframes set out in Policies 7.D.1 to 7.D.3.	• Largely support approach which gives flexibility to land managers. • Need to avoid disproportionate costs on land managers, and to give time flexibility to land managers in order to give effect to the NPSFW 2030 deadline.
Colin Scurr	268	Amend	Remove (excluding in human sewage, hazardous wastes and stormwater, and from industrial and waste premises)	• All discharges must be treated the same.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 268 ref. 34</i>		• <i>Suggested relief inconsistent with the structure of the plan change.</i> • <i>Discharges have different characteristics.</i> • <i>Inappropriate for all discharges to be treated the same.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 268 ref. 34</i>		• <i>Due to uncertainty surrounding application of the discharge rules and inconsistencies within the plan, between the plan and RMA, and NPSFW, Silver Fern Farms opposes the adoption of section 7.D policies in their current form and as such opposes submissions in support of those policies without bias.</i>
Forest and Bird	271	Amend	Add new Policy 7.D.4: "Ensure all water bodies meet specified limits and time frames by carrying out regular monitoring and applying strict enforcement procedures."	• PC6A depends on ORC monitoring water quality and enforcing water quality standards efficiently and effectively.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 34</i>		• <i>Not all waterways need to be enhanced.</i> • <i>Background data required before steps are taken to restrict agricultural activities.</i>
<i>Central Otago Environmental Society</i>	1028	<i>Support submission 271 ref. 34</i>		• <i>Monitoring and enforcement essential for successful outcome.</i>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 34</i>		• <i>Monitoring and enforcement are part of the Council's functions and don't need specific policies.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 34</i>		• <i>Background data required before any steps are taken to restrict agricultural activities.</i> • <i>No point monitoring if the activity's effects cannot be identified.</i>
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 34</i>		<ul style="list-style-type: none"> • Even with best practice limits and levels not achievable. Monitoring and enforcement won't help. • Low limits not necessary where assimilative capacity sufficient to avoid adverse effects.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 34</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 34</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Contact Energy Limited	284	Amend	<p>Amend 7.D [heading] to read as follows: "Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous waste and stormwater, from industrial and trade premises or associated with infrastructure activities)"</p> <p>Add to the Glossary the definition of infrastructure taken from S2 of the RMA.</p>	<ul style="list-style-type: none"> • Not clear if hydro structures are industrial or trade premises. • Introduction needs to provide specifically for infrastructure and activities related to it.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 284 ref. 34</i>		<ul style="list-style-type: none"> • Water quality standards should apply to all activities.
<i>Oceana Gold (NZ) Limited</i>	1072	<i>Support in part submission 284 ref. 34</i>		<ul style="list-style-type: none"> • Clarification is needed around application of rules for activities associated with an industrial or trade premise. Is unclear if 12.B rules cover work at a mine site before mining commences. • 12.B rules should apply to all mine site operations.
Fish and Game (Otago)	287	Support	Strongly support the intent of this policy.	<ul style="list-style-type: none"> • Removes the longstanding prior distinction between point and non-point source discharges.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 34</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287</i>		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
<i>Mr NS Mackenzie</i>	1035			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr BJ Graham</i>	1036	<i>ref. 34</i>		
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 287 ref. 34</i>		<ul style="list-style-type: none"> • Due to uncertainty surrounding application of the discharge rules and inconsistencies within the plan, between the plan and RMA, and NPSFW, Silver Fern Farms opposes the adoption of section 7.D policies in their current form and as such opposes submissions in support of those policies without bias.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 34</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.

35 Policy 7.D.1 - Where discharge limits apply

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Jeff & Alison Thompson	78	Oppose	The mixing zones be reinstated to allow for more balanced data to be collected.	<ul style="list-style-type: none"> • Unfair to measure water quality in a drain and not allow for this water to mix in with other water in the environment. • Mixing zones allow for more balanced reporting of data. • Amount of water in a drain may be a very small and testing a sample of this could be highly concentrated giving a false indication of overall contamination.
<i>Waitaki District Council</i>	1003	<i>Support submission 78 ref. 35</i>		<ul style="list-style-type: none"> • Submitter seek reinstatement of mixing zones.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 78 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
The Cow Farm Limited	133	Oppose	Delete Policy 7.D.1.	<ul style="list-style-type: none"> • Impractical to require quality standards on discharges at the point of discharge. • Conflicts with RMA, which allows for a reasonable zone of mixing.
<i>Waitaki District Council</i>	1003	<i>Support submission 133</i>		<ul style="list-style-type: none"> • Impractical, conflicts with RMA which allows for a reasonable zone of mixing.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 35</i>		
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 133 ref. 35</i>		<ul style="list-style-type: none"> • The discharge of contaminants to land is supported. • Support a reduction in the discharge of contaminants directly or indirectly to water.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 133 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
Waitaki District Council	138	Oppose	Oppose policy 7.D.1.	<ul style="list-style-type: none"> • Removing the provision for mixing zones is inconsistent with RMA s107. • Equity issue by requiring dischargers to address effects that they are not responsible for e.g. Discharges from other land.
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Consistent with DCC position. • Concern about economic and social impact. • Control measures of PC6A go far beyond those required to achieve the stated environmental results.
<i>Otago Fish and Game Council</i>	1027	<i>Support in part submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Supports the removal of the premise that dilution is the solution.
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Everyone in the rural community needs to take collective responsibility for discharges.
<i>TrustPower</i>	1059	<i>Support submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 35</i>		<ul style="list-style-type: none"> • Areas of concern or support are consistent with those expressed by the NZTA. • Control measures proposed in plan change go beyond those required to achieve the stated environmental results. • Seek the submission is allowed.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Oppose	<p>That Policy 7.D.1 as currently drafted is deleted and a new policy inserted:</p> <p>"New Policy: 7.D.1 Apply limits on contaminants discharged into freshwater or onto land where it may enter freshwater</p> <p>Advice Note: Where the water quality within a specific catchment exceeds the water quality standards set for that catchment, or exceeds [a specified threshold], the Council will undertake targeted investigations to determine and address the causes of declining</p>	<ul style="list-style-type: none"> • Supports removal of mixing zones. • Implementation of policy may be difficult, especially identifying when a discharge is 'about to enter water' - risk water quality will continue to decline. • Appropriate to give policy guidance on what will happen should water quality continue to decline.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			water quality. Explanation: Where the levels of a specified contaminant are trending upwards and / or are exceeding the catchment limits, there should be targeted investigation into the causes of declining water quality."	
<i>Waitaki District Council</i>	1003	<i>Oppose submission 197 ref. 35</i>		<ul style="list-style-type: none"> • Submitter supports removal of mixing zones.
<i>Meridian Energy Limited</i>	1014	<i>Oppose submission 197 ref. 35</i>		<ul style="list-style-type: none"> • Relief sought does not consider reasonable mixing zones. • The applicability of water quality standards on discharges to land is flawed.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 35</i>		<ul style="list-style-type: none"> • This policy addresses non-point source discharges. Point-source discharges are addressed elsewhere. • Reference to "freshwater" is opposed as the proposed plan change should protect public water bodies only.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 35</i>		<ul style="list-style-type: none"> • 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>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 197 ref. 35</i>		<ul style="list-style-type: none"> • Applying limits to discharges at or before the point of discharge is inconsistent with the RMA and NPSFW for reasonable mixing and as such Silver Fern Farms opposed the removal of mixing zones in its original submission. Therefore opposes submissions supporting retention of policy 7.D.1 as it stands.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 35</i>		<ul style="list-style-type: none"> • Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
NZ Transport Agency	203	Oppose	Deletion of Policy 7.D.1.	<ul style="list-style-type: none"> • Not appropriate to remove mixing zones. • Discharges from land to water occur with contributions from other land. Equity issue for dischargers addressing effects they are not responsible for. • Leads to Schedule 16 and Rule 12.C.1.1. Not appropriate due to issues with Schedule 16.
<i>Waitaki District Council</i>	1003	<i>Support submission 203 ref. 35</i>		<ul style="list-style-type: none"> • Submitter opposes removal of mixing zones. • Equity issue requiring dischargers to address effects they are not responsible for.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 35</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 35</i>		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
<i>TrustPower</i>	1059	<i>Support submission 203 ref. 35</i>		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui</i>	1065	<i>Oppose submission 203 ref. 35</i>		<ul style="list-style-type: none"> • The removal of mixing zones is supported.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Runanga</i>				
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 203 ref. 35</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing.</i> • <i>Neutral on the other aspects of those submissions.</i>
Trustpower Limited	206	Amend	Amend Proposed Policy 7.D.1 and insert an exemption note as follows (or similar): 7.D.1 Apply limits on contaminants in discharges from land where they are about to enter water. Note: This policy does not apply to discharges from water to water including those associated with damming and diversion, or hydroelectric generation activities.	<ul style="list-style-type: none"> • Discharges associated with hydroelectricity generation may be loaded with contaminants from upstream, so need excluding.
<i>Waitaki District Council</i>	1003	<i>Support submission 206 ref. 35</i>		<ul style="list-style-type: none"> • <i>Equity issues requiring dischargers to address effects they are not responsible for.</i>
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 35</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support in part submission 206 ref. 35</i>		<ul style="list-style-type: none"> • <i>Support where the effects of the damming etc cause no increase in contaminant load, or have no effects on "water quality" over and above those existing when water entered the dam.</i>
M C Holland Farming Ltd	207	Amend	That Policy 7.D.1 amended to set realistic and measureable discharge limits and time limits to attain them.	<ul style="list-style-type: none"> • What is meant by 'discharges' in 7.D.1 unclear. • Overland runoff and leaching not easy to measure, little guidance from ORC on where and how measurements taken. • Not workable in current form.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 207 ref. 35</i>		<ul style="list-style-type: none"> • <i>Concern landowners held accountable for discharge they have no responsibility for.</i> • <i>Limits and timeframe unrealistic and unachievable.</i> • <i>Need reinstatement of mixing zones.</i>
Dunedin City Council	211	Amend	That Policy 7.D.1 is revised as a consequence of amendments to Schedule 16 and to provide clarity on where the limits will apply.	<ul style="list-style-type: none"> • Removing mixing zones is inconsistent with RMA. • Removing mixing zones in Policy 7.D.1 and retaining them in Policy 7.7.6 can lead to confusion. Unclear how these consent policies relate to some discharges and how they relate to general policies. • Raises an equity issue by requiring dischargers to address effects that they are not responsible for. • Inappropriate due to issues with Schedule 16.
<i>Waitaki District Council</i>	1003	<i>Support submission 211 ref. 35</i>		<ul style="list-style-type: none"> • <i>Submitter opposes removal of mixing zones.</i> • <i>Equity issue requiring dischargers to address effects they are not responsible for.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 35</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 35</i>		<ul style="list-style-type: none"> • <i>Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.</i>
<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. 35</i>		<ul style="list-style-type: none"> • <i>Concern landowners accountable for discharges they have no responsibility for.</i> • <i>Limits and timeframes unrealistic and unachievable.</i> • <i>Need reinstatement of mixing zones.</i>
<i>TrustPower</i>	1059	<i>Support</i>		<ul style="list-style-type: none"> • <i>Supports mixing zones being retained as provided for in the RMA.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 211 ref. 35</i>		<ul style="list-style-type: none"> • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submission 211 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 211 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 35</i>		<ul style="list-style-type: none"> • 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.
<i>Vivienne & Greg Kerr</i>	213	Support	Support.	<ul style="list-style-type: none"> • No reason given.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 213 ref. 35</i>		<ul style="list-style-type: none"> • Submitter support policy.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 213 ref. 35</i>		<ul style="list-style-type: none"> • Applying limits to discharges at or before the point of discharge is inconsistent with the RMA and NPSFW for reasonable mixing and as such Silver Fern Farms opposed the removal of mixing zones in its original submission. Therefore opposes submissions supporting retention of policy 7.D.1 as it stands.
<i>Fulton Hogan Limited</i>	222	Oppose	Delete the policy or change it significantly to give effect to Policy 6.5.5(c) of the RPS by setting limits outside of a zone of reasonable mixing.	<ul style="list-style-type: none"> • Doesn't give effect to RPS and RMA, by recognising mixing zones. • Introduces uncertainty by not adequately guiding subsequent rules as to where limits will be applied.
<i>Holcim (New Zealand) Limited</i>	224			
<i>Meridian Energy Limited</i>	1014	<i>Support submission 222 ref. 35</i>		<ul style="list-style-type: none"> • It should be made clearer where limits will be applied. • The policy should be redrafted to ensure consistency with the RMA.
<i>Waitaki District Council</i>	1003	<i>Support submissions 222 and 224 ref. 35</i>		<ul style="list-style-type: none"> • Doesn't give effect to RMA or RPS by removing mixing zones.
<i>TrustPower</i>	1059	<i>Support submissions 222 and 224 ref. 35</i>		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submissions 222 and 224 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submissions 222 and 224 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
<i>Silver Fern Farms Limited</i>	238	Amend	<p>These inconsistencies [re mixing zones] need to be rectified.</p> <p>Would like the provision for mixing zones retained and ensure that the values of industry (and the investment made in industry) are given appropriate recognition pursuant to the NPSFW.</p>	<ul style="list-style-type: none"> • Inconsistent with other parts of plan. • RMA and NPSFW allow for mixing/dilution. • Cleaning, dilution and disposal of waste listed as national value in NPSFW. • Removing mixing zones inconsistent with provision for dilution. • PC6A has no certainty for investment. • Not effects-based.
<i>Waitaki District Council</i>	1003	<i>Support submission 238 ref. 35</i>		<ul style="list-style-type: none"> • Inconsistencies, conflicts with the RMA which allows for a reasonable zone of mixing.
<i>Isa Holdings Ltd</i>	1058	<i>Support in part</i>		<ul style="list-style-type: none"> • Supports mixing zones being included in the plan.

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		<i>submission 238 ref. 35</i>		
<i>TrustPower</i>	1059	<i>Support submission 238 ref. 35</i>		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submission 238 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 238 ref. 35</i>		<ul style="list-style-type: none"> • The removal of mixing zones is supported. • The discharge of industrial or trade related contaminants to water is opposed.
Fonterra Co-operative Group Limited	241	Oppose	Delete the policies or change them significantly to: (a) recognise that it is not appropriate to apply discharge quality standards on all discharges at the point of discharge. (b) remove terms that introduce a high level of uncertainty such as "limited time period", "minimise the discharge" "expeditious" and "innovative practices".	<ul style="list-style-type: none"> • Does not provide certainty or framework for rules and resource consents. • Potential consequences for current and future discharges. • Inappropriate to provide significant discretion to consent authority. • Consideration of reasonable mixing still required under RMA for discharge permit application. • More appropriate to provide guidance on reasonable mixing so issue doesn't need debating from first principles for each consent application.
<i>Waitaki District Council</i>	1003	<i>Support submission 241 ref. 35</i>		<ul style="list-style-type: none"> • Lack of certainty, consideration of mixing still required under RMA.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 35</i>		<ul style="list-style-type: none"> • Water quality will not be maintained or enhanced unless standards are applied at point of discharge.
<i>Contact Energy Limited</i>	1013	<i>Support in part submission 241 ref. 35</i>		<ul style="list-style-type: none"> • The policy should recognise that applying discharge quality standards on all discharges at the point of discharge is not appropriate.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 35</i>		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
<i>TrustPower</i>	1059	<i>Support submission 241 ref. 35</i>		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submission 241 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 241 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 35</i>		<ul style="list-style-type: none"> • Consistent with relief sought by further submitter.
Ravensdown Fertiliser Co-operative Ltd	248	Oppose	Policy 7.D.1 be deleted and replaced with a new Policy 7.D.1 that adopts an approach that establishes catchment load and sets limits based on the assimilative capacity of the water.	<ul style="list-style-type: none"> • Limits are impracticable, unrealistic and simplistically set at desired water quality without mixing. • Prefer setting catchment load limits and assimilative capacity of the waterbody, with each land use determining how they contribute to that limit. • Time lag makes it difficult for land user to predict cause and effect. • Difficult to isolate and predict flow paths and linkages within and between
New Zealand Fertiliser Manufacturers Research Association Inc	252		Alternatively, Policy 7.D.1 should be reviewed once the Land & Water Forum has presented their second report to Ministers	

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			outlining the recommendations on a framework for setting and managing objectives and limits for fresh water quality (and quantity).	property boundaries for diffuse discharges. • Doesn't give effect to RMA, by recognising mixing zones.
<i>Mr RJ Borst</i>	1034	<i>Support submissions 248 and 252 ref. 35</i>		<ul style="list-style-type: none"> • Supports setting of catchment load limits. • Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 submissions 248 and 252 ref. 35</i>		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submissions 248 and 252 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
<i>Waitaki District Council</i>	1003	<i>Support submissions 248 and 252 ref. 35</i>		<ul style="list-style-type: none"> • Limits are impracticable, unrealistic and simplistically set at desired water quality without mixing. • Doesn't give effect to RMA by recognising mixing zones.
<i>B & J Smith</i>	1006	<i>Support submission 248 ref. 35</i>		<ul style="list-style-type: none"> • Limits are impracticable and simplistically set.
<i>TrustPower</i>	1059	<i>Support submission 248 ref. 35</i>		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submission 248 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Waitaki Irrigators Collective Limited</i>	257	<i>Amend</i>	Change wording to more clearly state what the presumed intent of the policy is. "Water" in this context requires a definition. Perhaps "flowing water body that eventually connects to the coast".	<ul style="list-style-type: none"> • "Water" has definition of RMA. • Results in limits being placed on discharges to any water body, e.g. puddles, wetlands, and unconnected swales. • Removes some mitigation options.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ballance Agri-Nutrients Ltd	262	Oppose	Policy 7.D.1 be deleted and replaced with a new Policy 7.D.1 that adopts an approach that establishes catchment load and sets limits based on the assimilative capacity of the water. Alternatively, Policy 7.D.1 should be reviewed once the Land & Water Forum has presented their second report to Ministers outlining the recommendations on a framework for setting and managing objectives and limits for fresh water quality (and quantity).	<ul style="list-style-type: none"> Limits are impracticable, unrealistic and simplistically set at desired water quality without mixing. Prefer setting catchment load limits and assimilative capacity of the waterbody, with each land use determining how they contribute to that limit. Time lag makes it difficult for land user to predict cause and effect. Difficult to isolate and predict flow paths and linkages within and between property boundaries for diffuse discharges. Doesn't give effect to RMA, by recognising mixing zones.
<i>Waitaki District Council</i>	1003	<i>Support submission 262 ref. 35</i>		<ul style="list-style-type: none"> Limits are impracticable, unrealistic and simplistically set at desired water quality without mixing. Doesn't give effect to RMA by recognising mixing zones.
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 35</i>		<ul style="list-style-type: none"> Supports setting of catchment load limits. Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 35</i>		<ul style="list-style-type: none"> Concern landowners accountable for discharges they have no responsibility for. Limits and timeframes unrealistic and unachievable. Need reinstatement of mixing zones.
<i>TrustPower</i>	1059	<i>Support submission 262 ref. 35</i>		<ul style="list-style-type: none"> Supports mixing zones being retained as provided for in the RMA. Current policy framework does not provide for that. Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 35</i>		<ul style="list-style-type: none"> Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 262 ref. 35</i>		<ul style="list-style-type: none"> Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. Neutral on the other aspects of those submissions.
Environmental Defence Society	267	Amend	Amend the policy so that it is clear when the policy applies.	<ul style="list-style-type: none"> Reference to "where they are about to enter water" is unclear.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Framework should cover diffuse and point source discharges.
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 267 ref. 35</i>		<ul style="list-style-type: none"> • Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 35</i>		<ul style="list-style-type: none"> • Oppose submission in that it supports plan change and use of prohibited activity status.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 267 ref. 35</i>		<ul style="list-style-type: none"> • Inconsistent with relief sought by further submitter.
Colin Scurr	268	Oppose	Delete.	<ul style="list-style-type: none"> • Imposing limits prior to discharge inconsistent with RMA which anticipates degree of mixing and assimilation. • Section 68 of RMA requires a rule to have regard to adverse effects. "prior to discharge" cannot have adverse effects as not discharged yet.
<i>Waitaki District Council</i>	1003	<i>Support submission 268 ref. 35</i>		<ul style="list-style-type: none"> • Doesn't give effect to RMA by recognising mixing zones.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 35</i>		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 268 ref. 35</i>		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.
Horticulture New Zealand	269	Amend	Amend the approach in Policy 7.D.1 to setting land use activity based limits that are workable and achievable and recognise human use values and provide for zones of reasonable mixing.	<ul style="list-style-type: none"> • Does not provide for reasonable mixing. • Point of entry not defined. • Limits for turbidity need to account for reasonable mixing. • User will not know when/whether resource consent is required. • Policy is uncertain, unworkable and unachievable for non-point discharges.

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 269 ref. 35</i>		<ul style="list-style-type: none"> • <i>Doesn't provide for reasonable mixing.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 35</i>		<ul style="list-style-type: none"> • <i>Concern landowners accountable for discharges they have no responsibility for.</i> • <i>Limits and timeframes unrealistic and unachievable.</i> • <i>Need reinstatement of mixing zones.</i>
<i>TrustPower</i>	1059	<i>Support submission 269 ref. 35</i>		<ul style="list-style-type: none"> • <i>Supports mixing zones being retained as provided for in the RMA.</i> • <i>Current policy framework does not provide for that.</i> • <i>Policy 7.D.1 should then be withdrawn.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 35</i>		<ul style="list-style-type: none"> • <i>Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this.</i> • <i>Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.</i>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 35</i>		<ul style="list-style-type: none"> • <i>Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.</i> • <i>N values described not based on science, the levels set are unnecessary and will not result in improvement in water quality in the Etrick-Roxburgh area. Measuring process unworkable.</i> • <i>Intention in the policy will dramatically increase cost, consequence will be substantial economic reduction.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 269 ref. 35</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing.</i> • <i>Neutral on the other aspects of those submissions.</i>
Contact Energy Limited	284	Amend	Amend Policy 7.D.1: "Apply limits on contaminants in discharges where they are about to enter a fresh water body for the first time..."	<ul style="list-style-type: none"> • <i>Not clear where 'water' is located, the point of discharge or re-discharge.</i> • <i>Potential for limits to be applied to initial discharge to water body and subsequent points.</i>
Fish and Game (Otago)	287	Support	Amendments to policies and associated provisions to ensure the use (or non use) of reasonable mixing zones and compliance limits establishes a practicable, enforceable regime to manage water quality.	<ul style="list-style-type: none"> • <i>Conditionally support policy if proven to be realistic and effective.</i> • <i>Removing reasonable mixing needs considering along with appropriateness of compliance limits at discharge point.</i> • <i>Hinges on practicality of imposing limits for non-point discharges, and if technical method exists to give it effect and ensure compliance and enforceability.</i>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 287 ref. 35</i>		<ul style="list-style-type: none"> • <i>Submitter seeks reconsideration of removal of reasonable mixing.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 35</i>		<ul style="list-style-type: none"> • <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. 35</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 287 ref. 35</i>		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 287 ref. 35</i>		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 287 ref. 35</i>		<ul style="list-style-type: none"> • Applying limits to discharges at or before the point of discharge is inconsistent with the RMA and NPSFW for reasonable mixing and as such Silver Fern Farms opposed the removal of mixing zones in its original submission. Therefore opposes submissions supporting retention of policy 7.D.1 as it stands.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 35</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Otago Water Resource User Group (OWRUG)	292	Amend	Amend the reference to receiving "water" so that it excludes water within a water race or irrigation dam when that irrigation water does not re-enter a natural water body.	<ul style="list-style-type: none"> • No adverse environmental effect from activity.
<i>Mr RJ Borst</i>	1034	<i>Support submission 292 ref. 35</i>		<ul style="list-style-type: none"> • Support for reasons stated in original submission.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>				
Clydevale Dairy Farms Ltd	297	Oppose	Delete Policy 7.D.1.	<ul style="list-style-type: none"> • Applies before discharge has actually occurred, implying usual approach of establishing a mixing zone will not occur.
Greenfield Farming Ltd	298			
Big River Dairy Limited	299			
<i>Waitaki District Council</i>	1003	Support submissions 297 – 299 ref. 35		<ul style="list-style-type: none"> • Applies before discharge has occurred.
<i>Federated Farmers of New Zealand</i>	1057	Support submissions 297 – 299 ref. 35		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
The Director-General of Conservation	306	Support	Retain as notified.	<ul style="list-style-type: none"> • Policy gives effect to some RMA section 30 functions.
<i>Waitaki District Council</i>	1003	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • Submitter supports policy.
<i>Craiglea Limited</i>	1012	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • No need for further restrictions on discharges.
<i>Hopefield Investments Ltd</i>	1019	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • No reason given.
<i>Mr RJ Borst</i>	1034	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		ref. 35		<ul style="list-style-type: none"> • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
Glenshee Station Limited	1062	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 35		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Oppose	Policy 7.D.1 should be deleted.	<ul style="list-style-type: none"> • Imposing limits prior to discharge does not accord with RMA Ss 69(3), 70(1) and (2) which anticipate a degree of mixing and assimilation. • A rule must have regard to adverse effects (RMA S 68a). "Prior to discharge" can not have environmental effects as it has not been discharged.
Waitaki District Council	1003	Support submission 308 ref. 35		<ul style="list-style-type: none"> • Inconsistent with RMA, applies before discharge has occurred.
Dunedin City Council	1025	Support submission 308 ref. 35		<ul style="list-style-type: none"> • No reasons given.
Strath Taieri Community Board	1029	Support submission 308 ref. 35		<ul style="list-style-type: none"> • No reason given.
Federated Farmers of New Zealand	1057	Support submission 308 ref. 35		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
TrustPower	1059	Support submission 308 ref. 35		<ul style="list-style-type: none"> • Supports mixing zones being retained as provided for in the RMA. • Current policy framework does not provide for that. • Policy 7.D.1 should then be withdrawn.
Alliance Group Limited	1060	Support submission 308 ref. 35		<ul style="list-style-type: none"> • Alliance supports mixing zones being retained as provided for in the RMA and agrees that the current policy framework does not provide for this. • Alliance agrees with other submitters that Policy 7.D.1 should be withdrawn.
Silver Fern Farms Limited	1070	Support in part submission 308		<ul style="list-style-type: none"> • Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 35</i>		<i>opposed to the removal of the provision for reasonable mixing.</i> <i>• Neutral on the other aspects of those submissions.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 308 ref. 35</i>		<i>• Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Oppose	Policy 7.D.1 should be deleted.	<ul style="list-style-type: none"> • Imposing limits prior to discharge does not accord with RMA sections 69(3), 70(1) and (2) which anticipate a degree of mixing and assimilation. • A rule must have regard to adverse effects (RMA section 68a). "Prior to discharge" can not have environmental effects as it has not been discharged.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submission 309 ref. 35</i>		<i>• Inconsistent with RMA, applies before discharge has occurred.</i>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 309 ref. 35</i>		<i>• No reasons given.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 309 ref. 35</i>		<i>• No reason given.</i>
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Support submission 309 ref. 35</i>		<i>• Agree discharges should be provided for where best practicable option is employed but schedule 16 not met.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 309 ref. 35</i>		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 309 ref. 35</i>		<ul style="list-style-type: none"> • <i>Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing.</i> • <i>Neutral on the other aspects of those submissions.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 309 ref. 35</i>		<i>• Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 309 ref. 35</i>		<ul style="list-style-type: none"> • <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>Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</i>
Glen Dene Limited	310	Oppose	Delete Policy 7.D.1.	<ul style="list-style-type: none"> • Imposing limits prior to discharge does not accord with RMA sections 69(3), 70(1) and (2) which anticipate a degree of mixing and assimilation. • A rule must have regard to adverse effects (RMA section 68a). "Prior to discharge" can not have environmental effects as it has not been discharged.
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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Robert Borst	322			
Dunedin International Airport Limited	323			
A W B Elliot	324			
Simon Parks	325			
Kyeburn Pastoral Company Ltd	326			
<i>Waitaki District Council</i>	1003	<i>Support submissions 310 - 326 ref. 35</i>		<i>• Inconsistent with RMA, applies before discharge has occurred.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 - 326 ref. 35</i>		<i>• Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submissions 310 - 326 ref. 35</i>		<i>• Silver Fern Farms opposes removal of mixing zone provisions and application of limits at the point of discharge. It therefore supports other submissions also opposed to the removal of the provision for reasonable mixing. • Neutral on the other aspects of those submissions.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 35</i>		<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>

36 Policy 7.D.2 - Consenting of existing discharges

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
The Cow Farm Limited	133	Oppose	Delete this policy.	<ul style="list-style-type: none"> • Steps (a)-(b) predetermine outcome of consent applications. • Consent may sometimes be appropriate where the costs/effects of complying with Schedule 16 outweigh benefits. • Schedule 16 limits don't relate to natural or human use values in any scientifically coherent way. • No environmental scientific basis for differentiating between pre and post 31 March 2012 discharges.
New Zealand Pork Industry Board	145	Support	Retain intent of the Policy.	<ul style="list-style-type: none"> • Supports recognitions that not all industries/land uses will meet requirements of Schedule 16 within timeframes, more time may be needed to undertake change.
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 145 ref. 36</i>		<i>• Intent of the policy is not to buy more time, but to allow discharges in limited, but still temporary circumstances.</i>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Oppose	That Policy 7.D.2 be deleted. OR Should this policy be retained that it is redrafted to provide clear guidance around the timeframes for achieving the discharge limits for water quality.	<ul style="list-style-type: none"> • inconsistent with NPSFW, Policy A2 requires ORC to set timeframes to meet water quality standards, Policy 7.D.2 gives unfettered discretion to extend timeframes in Schedule 16.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 36</i>		<i>• Provided dispensations are necessary to accommodate the required transition to the compliance levels.</i>
<i>Federated Farmers of New</i>	1057	<i>Support in part</i>		<i>• May be circumstances where costs/effects of not meeting limits outweigh</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 197 ref. 36</i>		<i>benefits.</i> • <i>No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 36</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. 36</i>		• <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
Irrigation New Zealand Incorporated	202	Amend	Rewrite.	• "Limited time period", "minimise the discharge" meanings unclear. • Timeframes need to reflect investment, development.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 36</i>		• <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>
NZ Transport Agency	203	Amend	Include a rule to allow consenting of discharges to water where changes to land management or infrastructure have been unsuccessful in meeting the limits in Schedule 16 (provided that the requirements of Policy 7.D.2 (b) and (c) are met). Amend Policy 7.D.2 to indicate what "a limited time period" is considered to be.	• No distinction between discharges to water and to land. • The option for consent to discharge to water should be allowed. • If Council intends to not tolerate existing discharges to water, then this Policy is opposed. • "Limited period of time" is unhelpfully vague and uncertain.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 36</i>		• <i>No reasons given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 36</i>		• <i>May be circumstances where costs/effects of not meeting limits outweigh benefits.</i> • <i>No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 203 ref. 36</i>		• <i>Consenting of discharges that exceed the Schedule 16 limits should be subject to appropriate policy guidance and public notification.</i>
M C Holland Farming Ltd	207	Amend	Policy 7.D.2 amended to set realistic and measurable discharge limits and time limits to attain them.	• Schedule 16 results in consent required for normal farming activities. • Consent obtained for short period of time. • Do not understand what 'changes' would be required to meet Schedule 16.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 207 ref. 36</i>		• <i>Concern landowners held accountable for discharge they have no responsibility for.</i> • <i>Limits and timeframe unrealistic and unachievable.</i> • <i>Need reinstatement of mixing zones.</i>
Dunedin City Council	211	Amend	A rule is included to allow consenting of discharges to water where changes to land management or infrastructure have been unsuccessful in meeting the limits in Schedule 16 (provided that the requirements of Policy 7.D.2(b) and (c) are met). Amend to indicate what "a limited time period" is considered to be.	• Does not distinguish between discharges to land or water. • If it is ORC's intention to not tolerate existing discharges then Policy opposed. • "Limited time period" unhelpfully vague and should be clarified for certainty.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 36</i>		• <i>No reason given.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 211 ref. 36</i>		• <i>For the reasons given by the submitter.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 36</i>		<ul style="list-style-type: none"> • Objectives and policies are overly stringent, not consistent with NPS, RPS and RMA and their focus is too narrow.
<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. 36</i>		<ul style="list-style-type: none"> • May be circumstances where costs/effects of not meeting limits outweigh benefits. • No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 36</i>		<ul style="list-style-type: none"> • 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.
<i>Fonterra Co-operative Group Limited</i>	241	<i>Oppose</i>	Delete the policies or change them significantly to: (a) recognise that it is not appropriate to apply discharge quality standards on all discharges at the point of discharge. (b) remove terms that introduce a high level of uncertainty such as "limited time period", "minimise the discharge" "expeditious" and "innovative practices".	<ul style="list-style-type: none"> • Does not provide certainty or framework for rules and resource consents. • Potential consequences for current and future discharges. • Inappropriate to provide significant discretion to consent authority. • Consideration of reasonable mixing still required under RMA for discharge permit application. • More appropriate to provide guidance on reasonable mixing so issue doesn't need debating from first principles for each consent application.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 36</i>		<ul style="list-style-type: none"> • Water quality will not be maintained or enhanced unless standards are applied at point of discharge.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 241 ref. 36</i>		<ul style="list-style-type: none"> • Provides more certainty of robust outcome.
<i>Contact Energy Limited</i>	1013	<i>Support in part submission 241 ref. 36</i>		<ul style="list-style-type: none"> • The policy should recognise that applying discharge quality standards on all discharges at the point of discharge is not appropriate.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 36</i>		<ul style="list-style-type: none"> • Concern landowners accountable for discharges they have no responsibility for. • Limits and timeframes unrealistic and unachievable. • Need reinstatement of mixing zones.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 36</i>		<ul style="list-style-type: none"> • Consistent with relief sought by further submitter.
<i>Ravensdown Fertiliser Co-operative Ltd</i>	248	<i>Amend</i>	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	<ul style="list-style-type: none"> • Currently unclear.
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 36</i>		<ul style="list-style-type: none"> • Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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	Amend	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	<ul style="list-style-type: none"> • Currently unclear.
<i>Mr RJ Borst</i>	1034	Support submission 252 ref. 36		<ul style="list-style-type: none"> • Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Waitaki Irrigators Collective Limited	257	Amend	There needs to be more definition provided to enable this policy to be better understood.	<ul style="list-style-type: none"> • What is "limited period". Days, weeks, years? • What is "expeditious path"? Who determines this? • Does not provide timeframe when changes to minimise discharge should occur. • Including changes made prior to 31 March 2012.
Ballance Agri-Nutrients Ltd	262	Amend	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	<ul style="list-style-type: none"> • Currently unclear.
<i>Meridian Energy Limited</i>	1014	Support submission 262 ref. 36		<ul style="list-style-type: none"> • Where status of activities is uncertain and open to various interpretations, it should be made clearer.
<i>Mr RJ Borst</i>	1034	Support submission 262 ref. 36		<ul style="list-style-type: none"> • Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Environmental Defence Society	267	Amend	Amend the policy so that it is more specific and clear as to the degree to which a discharge must be minimised for the policy to apply, and that the requirement for an "expeditious path" is more robust and measurable.	<ul style="list-style-type: none"> • Consenting past timeframe specified in Schedule 16 should only occur when a robust plan to achieve limits is demonstrated. • Policy could be used as vehicle to delay making necessary changes to land management practices.
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 267 ref. 36</i>		<ul style="list-style-type: none"> • <i>Supports greater clarity is desirable.</i> • <i>The generality of the relief sought means that it is not possible to determine the effect if the submission were accepted.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 267 ref. 36</i>		<ul style="list-style-type: none"> • <i>Supports clarity in the use of terminology.</i>
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 267 ref. 36</i>		<ul style="list-style-type: none"> • <i>Support seeking better clarity of values and objectives and seeking measurable outcomes and clear standards.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Glenshee Station Limited</i>	1062	<i>Oppose submission 267 ref. 36</i>		<ul style="list-style-type: none"> • <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. 36</i>		<ul style="list-style-type: none"> • <i>Inconsistent with relief sought by further submitter.</i>
Colin Scurr	268	Amend	Amend Policy to provide for the consenting of discharges, where land management practices or infrastructure minimise the discharge and best practicable option to achieve Schedule 16 is being utilised.	<ul style="list-style-type: none"> • Schedule 16 limits do not relate to natural or human use values in any scientific coherent way. • Costs or effects on other matters of complying with Schedule 16 may outweigh the benefits, in which case resource consent may be appropriate. • No environmental or scientific basis for differentiating between pre and post 31 March 2012 discharges.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 268 ref. 36</i>		<ul style="list-style-type: none"> • <i>May be circumstances where costs/effects of not meeting limits outweigh benefits.</i> • <i>No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.</i>
Horticulture New Zealand	269	Oppose	Delete Policy 7.D.2.	<ul style="list-style-type: none"> • No certainty for land users as to whether consent will be granted. • Discretion of ORC to impose management changes that are unworkable or unachievable. • What conditions may be deemed 'expeditious'. • How will approach meet socio-economic values. • No assessment of costs to implement policy in terms of efficiency or effectiveness.
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 36</i>		<ul style="list-style-type: none"> • <i>Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.</i>
Forest and Bird	271	Amend	Amend to read: "7.D.2 Provide for the consenting of discharges, that first occurred prior to 31 March 2012, for a limited time period beyond the timeframe specified in Schedule 16, where: (a) ...; and (b) Additional changes to management practices or infrastructure are sought to achieve the limits; and (c) An expeditious path to compliance with Schedule 16 within less than 2 years is identified."	<ul style="list-style-type: none"> • Policy in combination with associated rule may enable industry laggards to avoid meeting time frames and limits in Schedule 16.
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 271 ref. 36</i>		<ul style="list-style-type: none"> • <i>Request for expeditious path to compliance is unnecessary and inappropriate, onerous and costly, with little environmental benefits gained.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 36</i>		<ul style="list-style-type: none"> • <i>Not all waterways need to be enhanced.</i> • <i>Background data required before steps are taken to restrict agricultural activities.</i>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 36</i>		<ul style="list-style-type: none"> • <i>Two-year timeframe is unrealistic.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 36</i>		<ul style="list-style-type: none"> • <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</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 36</i>		<ul style="list-style-type: none"> • <i>Timeframe unrealistic and unachievable.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 36</i>		<ul style="list-style-type: none"> • <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 36</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Federated Farmers of New Zealand</i>	278	<i>Amend</i>	<p>Combine 7.D.2 and 7.D.3 into a new 7.D.2 that reads as follows: "Provide for the consenting of discharges for a limited time period beyond the timeframe specified in Schedule 16, where: ... (d) where the economic cost and effect on existing investment of complying with Schedule 16 outweighs the immediate environmental improvement in the receiving environment where the discharge enters water." Include policy guidance on where a consent is required and how long a consent will be issued for.</p>	<ul style="list-style-type: none"> • <i>Doesn't recognise ability of receiving environment to assimilate contaminants.</i> • <i>True effects-based approach would allow for discharges that exceed the Schedule 16 limits but have no more than minor effects.</i> • <i>Impact of Schedule 16 on existing investment not recognised, and is inconsistent with RMA section 5.</i> • <i>Difference between 7.D.2 and 7.D.3 unclear - does 7.D.2 include diffuse discharges?</i> • <i>Guidance needed so someone knows when consent required, the timeframe that will be issued, and an account of the economic impact and the achievability of reaching the limits over time.</i>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 36</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 36</i>		<ul style="list-style-type: none"> • <i>The time frame is already lenient.</i> • <i>Surveys show that New Zealanders do not want water quality to be traded for economic development.</i> • <i>New Zealand economy relies on improving water quality.</i>
<i>Hopfield Investments Ltd</i>	1019	<i>Support submission 278 ref. 36</i>		<ul style="list-style-type: none"> • <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</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 36</i>		
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 36</i>		<ul style="list-style-type: none"> • <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. 36</i>		<ul style="list-style-type: none"> • <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>
Annie Stuart	280	Amend	Consent for such discharges should not be allowed when existing discharge levels are excessive i.e. there should be a limit applied to discharge levels still allowed for the following 5 or 7 year period, with emphasis put on applicants' consistent reduction.	<ul style="list-style-type: none"> • Plan change does not reflect pressure on Otago's water with currently proposed mining.
Fish and Game (Otago)	287	Amend	Amendments to appropriate plan provisions ensuring relevant consent holders are required to monitor water quality.	<ul style="list-style-type: none"> • Conditionally support policy, if the "expeditious path" includes monitoring at consent holder's expense.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 36</i>		<ul style="list-style-type: none"> • <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. 36</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 36</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Clydevale Dairy Farms Ltd</i>	297	Amend	Amend Policy 7.D.2 to enable the consenting of discharges where land management practices or infrastructure minimise the effects of the discharge; where the best practicable option to achieve Schedule 16 is being utilised; where granting the discharge is consistent with the purpose of the Act.	<ul style="list-style-type: none"> • After 'limited period' no consents will be obtainable for discharges that may breach Schedule 16. • There may be circumstances where costs or effects of not meeting limits outweigh benefits. • ORC must consider applications on merit and take account of all relevant Part
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Identify the relationship between the limits in Schedule 16 (if retained) and the [natural and] human use values.	<ul style="list-style-type: none"> • Il factors. • Not clear how limits relate to natural or human use values. • Scientific basis for differentiating pre and post 31 March 2012 discharges not clear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submissions 297 - 299 ref. 36</i>		<ul style="list-style-type: none"> • <i>May be circumstances where costs/effects of not meeting limits outweigh benefits.</i> • <i>No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.</i>
The Director-General of Conservation	306	Amend	That 7.D.2 be amended as follows, or to like effect: "Provide for the consenting of discharges ... (a) Changes in land management practices and/or infrastructure to minimise ..."	<ul style="list-style-type: none"> • May involve a multi-faceted approach.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 36</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 36</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 36</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 36</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049	<i>Oppose submission 306 ref. 36</i>		<ul style="list-style-type: none"> • <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 & 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</i>
<i>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 36</i>		
<i>Hawkdun Station</i>	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 36		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
Glenshee Station Limited	1062	Oppose submission 306 ref. 36		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 36		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 36		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Amend	Policy 7.D.2 be amended to provide for the consenting of discharges, where land management practices or infrastructure minimise the discharge, or best practicable option is being utilised to achieve Schedule 16, or assessment through the consent process shows that granting the discharge is consistent with the purpose of the Act.	<ul style="list-style-type: none"> • Schedule 16 limits do not relate to natural or human use values in any scientifically coherent way. • After 'limited period' (in Schedule 16) no provision for consents for discharges that breach Schedule 16, and only where (a)-(b) undertaken. • Predetermines outcome of such applications. Where costs or effects of complying with Schedule 16 outweigh the benefits, a consent may be appropriate. • No environmental scientific basis for differentiating between pre and post 31 March 2012 discharges.
The Director-General of Conservation	1011	Support submission 308 ref. 36		<ul style="list-style-type: none"> • Provides for adaptive management.
Contact Energy Limited	1013	Support submission 308 ref. 36		<ul style="list-style-type: none"> • Reasons stated in the submission.
Dunedin City Council	1025	Support submission 308 ref. 36		<ul style="list-style-type: none"> • No reasons given.
Strath Taieri Community Board	1029	Support submission 308 ref. 36		<ul style="list-style-type: none"> • No reason given.
Federated Farmers of New Zealand	1057	Support in part submission 308 ref. 36		<ul style="list-style-type: none"> • May be circumstances where costs/effects of not meeting limits outweigh benefits. • No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.
The NZ Transport Agency	1073	Support submission 308 ref. 36		<ul style="list-style-type: none"> • Seek that the submission be allowed and the Plan Change amended as per the submission.
Central Otago District Council & Clutha District Council	309	Amend	Policy 7.D.2 be amended to provide for the consenting of discharges, where land management practices or infrastructure minimise the discharge and best practicable option to achieve	<ul style="list-style-type: none"> • Schedule 16 limits do not relate to natural or human use values in any scientifically coherent way. • After 'limited period' (in Schedule 16) no provision for consents for discharges

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Schedule 16 is being utilised.	that breach Schedule 16, and only where (a)-(b) undertaken. <ul style="list-style-type: none"> • Predetermines outcome of such applications. Where costs or effects of complying with Schedule 16 outweigh the benefits, a consent may be appropriate. • No environmental scientific basis for differentiating between pre and post 31 March 2012 discharges.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 36</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 36</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 36</i>		<ul style="list-style-type: none"> • <i>Agree discharges should be provided for where best practicable option is employed must schedule 16 not met.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 309 ref. 36</i>		<ul style="list-style-type: none"> • <i>May be circumstances where costs/effects of not meeting limits outweigh benefits.</i> • <i>No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 36</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 36</i>		<ul style="list-style-type: none"> • <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>Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</i>
Glen Dene Limited	310	Amend	Amend Policy 7.D.2 to provide for the consenting of discharges, where land management practices or infrastructure minimise the discharge and best practicable option to achieve Schedule 16 is being utilised.	<ul style="list-style-type: none"> • Schedule 16 limits do not relate to natural or human use values in any scientifically coherent way. • After 'limited period' (in Schedule 16) no provision for consents for discharges that breach Schedule 16, and only where (a)-(b) undertaken. • Predetermines outcome of such applications. Where costs or effects of complying with Schedule 16 outweigh the benefits, a consent may be appropriate. • No environmental scientific basis for differentiating between pre and post 31 March 2012 discharges.
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 in part submissions 310 - 326 ref. 36</i>		<ul style="list-style-type: none"> • <i>No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges; predetermines application outcome.</i>

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. 36</i>		<ul style="list-style-type: none"> • 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.

37 Policy 7.D.3 - Consenting of new discharges

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
The Cow Farm Limited	133	Amend	Policy 7.D.3 be amended to provide for consenting of discharges where the best practicable option is being employed to reduce the discharge and level of contaminants and recognise that in some circumstances Schedule 16 limits will be unobtainable.	<ul style="list-style-type: none"> • Agree rural land owners should always seek to reduce discharges. • If land owners can demonstrate technology to reduce discharges has been implemented consent should be granted.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 133 ref. 37</i>		<ul style="list-style-type: none"> • Oppose the discharge of contaminants that exceed the Schedule 16 limits.
Clutha Agricultural Development Board	139	Amend	Use term "Best Management Practices" instead of "technology or innovative practices".	<ul style="list-style-type: none"> • Match industry terminology and use commonly accepted terms. • Have consistency of terminology through out the plan change.
New Zealand Pork Industry Board	145	Support	Retain the intent of the Policy.	<ul style="list-style-type: none"> • Some industries may require more time to develop technology or innovation to make an activity compliant.
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 145 ref. 37</i>		<ul style="list-style-type: none"> • Intent of the policy is not to buy more time, but to allow discharges in limited, but still temporary circumstances.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Oppose	That Policy 7.D.3 be deleted. OR Should this policy be retained that it is redrafted to provide clear guidance around the timeframes for achieving the discharge limits for water quality.	<ul style="list-style-type: none"> • Inconsistent with NPSFW, Policy A2 requires ORC to set timeframes to meet water quality standards, Policy 7.D.2 gives unfettered discretion to extend timeframes in Schedule 16.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 37</i>		<ul style="list-style-type: none"> • Provided dispensations are necessary to accommodate the required transition to the compliance levels.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 197 ref. 37</i>		<ul style="list-style-type: none"> • May be circumstances where costs/effects of not meeting limits outweigh benefits. • No scientific or environmental basis for differentiating between pre and post 31 March 2012 discharges.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 37</i>		<ul style="list-style-type: none"> • 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. 37</i>		<ul style="list-style-type: none"> • Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Irrigation New Zealand Incorporated	202	Support	Extremely supportive of this policy.	<ul style="list-style-type: none"> • Encourages practical on-farm research and innovation. • Key to enable farmers to achieve limits.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 202 ref. 37</i>		<ul style="list-style-type: none"> • 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.
NZ Transport Agency	203	Amend	Amend rules in Section 12.C of the Plan to give effect to Policy	<ul style="list-style-type: none"> • No rule giving effect to 7.D.3.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			7.D.3.	<ul style="list-style-type: none"> No rule providing for consents to discharge to land under Policy 7.D.3. Activities become discretionary under RMA, but needs clarifying.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 37</i>		<ul style="list-style-type: none"> No reasons given.
Fonterra Co-operative Group Limited	241	Oppose	Delete the policies or change them significantly to: (a) recognise that it is not appropriate to apply discharge quality standards on all discharges at the point of discharge. (b) remove terms that introduce a high level of uncertainty such as "limited time period", "minimise the discharge" "expeditious" and "innovative practices".	<ul style="list-style-type: none"> Does not provide certainty or framework for rules and resource consents. Potential consequences for current and future discharges. Inappropriate to provide significant discretion to consent authority. Consideration of reasonable mixing still required under RMA for discharge permit application. More appropriate to provide guidance on reasonable mixing so issue doesn't need debating from first principles for each consent application.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 37</i>		<ul style="list-style-type: none"> Water quality will not be maintained or enhanced unless standards are applied at point of discharge.
<i>Contact Energy Limited</i>	1013	<i>Support in part submission 241 ref. 37</i>		<ul style="list-style-type: none"> The policy should recognise that applying discharge quality standards on all discharges at the point of discharge is not appropriate.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 37</i>		<ul style="list-style-type: none"> Concern landowners accountable for discharges they have no responsibility for. Limits and timeframes unrealistic and unachievable. Need reinstatement of mixing zones.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 37</i>		<ul style="list-style-type: none"> Consistent with relief sought by further submitter.
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	<ul style="list-style-type: none"> Currently unclear.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
<i>Mr RJ Borst</i>	1034	<i>Support submissions 248 and 252 ref. 37</i>		<ul style="list-style-type: none"> Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
Waitaki Irrigators Collective Limited	257	Amend	Supports a policy to allow for innovation and changes in technology which might provide for improved water quality in the future, however the current wording of this Policy is vague.	<ul style="list-style-type: none"> Provides only for consents which are part of development. Unclear how interpreted/implemented in practice. No corresponding rules.
Ballance Agri-Nutrients Ltd	262	Amend	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	<ul style="list-style-type: none"> Currently unclear.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 262 ref. 37</i>		<ul style="list-style-type: none"> Where status of activities is uncertain and open to various interpretations, it should be made clearer.
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 37</i>		<ul style="list-style-type: none"> Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Colin Scurr	268	Amend	Policy be amended to provide for consenting of discharges where the best practicable option is being employed to reduce the discharge and level of contaminants and recognise that in some circumstances Schedule 16 limits will be unobtainable.	<ul style="list-style-type: none"> Technological developments and innovations should be encouraged through consent option. Amend to ensure consistency with NPSFW Policy A3(b). Should consider applications on case-by-case basis and take all Part II matters in consideration.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 268 ref. 37</i>		<ul style="list-style-type: none"> Appropriate to enable consent and consider application on case by case basis, taking RMA Part II into account.
Horticulture New Zealand	269	Oppose	Delete Policy 7.D.3	<ul style="list-style-type: none"> Uncertain what is regarded as 'innovative practices'. Unclear what policy is providing for.
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 37</i>		<ul style="list-style-type: none"> Plan change is unbalanced in lacking recognition of the need for sustainability in land use and communities.
Forest and Bird	271	Amend	Amend to read: "Provide for the consideration of discharges that exceed Schedule 16 limits as part of the development of technology or innovative	<ul style="list-style-type: none"> Policy in combination with associated rule may enable industry laggards to avoid meeting time frames and limits in Schedule 16. Once granted, consents are difficult to review and rescind.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			practices associated with improving water quality to meet the standards, provided an expeditious path to compliance with Schedule 16 within less than 2 years is identified."	
New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)	1010	Oppose submission 271 ref. 37		• Request for expeditious path to compliance is unnecessary and inappropriate, onerous and costly, with little environmental benefits gained.
The Director-General of Conservation	1011	Support submission 271 ref. 37		• Links the policy to the scheduled standards.
Craiglea Limited	1012	Oppose submission 271 ref. 37		• Not all waterways need to be enhanced.
Horticulture New Zealand	1032	Oppose submission 271 ref. 37		• Two-year timeframe is unrealistic.
Mr RJ Borst	1034	Oppose submission 271 ref. 37		• Not all waterways need to be enhanced.
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. 37		• Timeframe unrealistic and unachievable.
Glenshee Station Limited	1062	Oppose submission 271 ref. 37		• 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.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 271 ref. 37		• Overly restrictive and disproportionate. • Does not take into account economic considerations.
Federated Farmers of New Zealand	278	Amend	Delete existing policy 7.D.3 [and incorporate into 7.D.2].	• Doesn't recognise ability of receiving environment to assimilate contaminants. • True effects-based approach would allow for discharges that exceed the Schedule 16 limits but have no more than minor effects.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> Impact of Schedule 16 on existing investment not recognised, and is inconsistent with RMA section 5. Difference between 7.D.2 and 7.D.3 unclear - does 7.D.2 include diffuse discharges? Guidance needed so someone knows when consent required, the timeframe that will be issued, and an account of the economic impact and the achievability of reaching the limits over time.
Albert McTainsh	1004	Support submission 278 ref. 37		<ul style="list-style-type: none"> Practical and workable alternatives, solutions and suggestions.
Hopefield Investments Ltd	1019	Support submission 278 ref. 37		<ul style="list-style-type: none"> 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 submission 278 ref. 37		<ul style="list-style-type: none"> No reason given.
Glenshee Station Limited	1062	Support in part submission 278 ref. 37		<ul style="list-style-type: none"> 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.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 278 ref. 37		<ul style="list-style-type: none"> Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use. Effects-based approach should allow for discharges that exceed Schedule 16 limits.
Fish and Game (Otago)	287	Support	<p>Retain the policy.</p> <p>In the alternative, amend the policy and/or include other plan provisions that have the intention of encouraging and promoting the development of new technologies and innovations to improve management of water quality.</p>	<ul style="list-style-type: none"> Important that Plan should incentivise development of new technologies and innovations.
Craiglea Limited	1012	Oppose submission 287 ref. 37		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality. Affected by a variety of activities, not just agricultural uses. Imposes unnecessary constraints on farming practices.
Mr RJ Borst	1034	Oppose submission 287 ref. 37		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality.
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			

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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 37</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Clydevale Dairy Farms Ltd</i>	297	Support	Ensure policy suite does not limit the consenting of discharges that exceed Schedule 16 to the circumstances of this policy.	<ul style="list-style-type: none"> • Technological developments and innovations should be encouraged by allowing consents to be sought. • Ability to grant consents that exceed limits should not be limited to these circumstances.
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			
The Director-General of Conservation	306	Amend	That 7.D.3 be amended as follows, or to like effect: "Provide for the consenting of discharges that exceed Schedule 16 limits as part of the development of technology and/or innovative practices associated with improving water quality to the Schedule 16 limits."	<ul style="list-style-type: none"> • Current policy doesn't require any consenting of discharges that exceed Schedule 16 limits to meet these limits.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • <i>Nothing to be gained from high and costly level of consenting requirements if ORC cannot monitor and enforce.</i> • <i>Proposed changes would require an enormous number of staff to monitor.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Moutere Station Limited</i> <i>Hawkdun Station</i>	1052 1053	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • 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.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • Schedule 16 sets limits for discharges, Schedule 15 sets measures of good receiving water quality.
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • Concerned with Schedule 16 limits, would be difficult to comply with. • Standards must be practical and achievable.
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 37</i>		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Amend	<p>The policy be amended to provide [and] to recognise that in some circumstances Schedule 16 limits will be unobtainable or unjustified.</p> <p>The policy should allow for consenting of discharges where land management practices or infrastructure minimise the discharge, or best practicable option is being utilised to achieve Schedule 16, or assessment through the consent process shows that granting the discharge is consistent with the purpose of the Act.</p>	<ul style="list-style-type: none"> • Technological developments and innovation should be encouraged. • Consents should be encouraged where best practicable options are being employed consistent with the NPS Policy A3(b). • Consider each application on its merits and take into account factors relevant under Part II of the RMA.
<i>Contact Energy Limited</i>	1013	<i>Support submission 308 ref. 37</i>		<ul style="list-style-type: none"> • Reasons stated in the submission.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 308 ref. 37</i>		<ul style="list-style-type: none"> • Policy 7.D.3 should be amended, as Schedule 16 is overly restrictive and does not provide for avoiding, remedying or mitigating adverse effects. • Opposes policies inconsistent with RMA.
<i>Dunedin City Council</i>	1025	<i>Support submission 308</i>		<ul style="list-style-type: none"> • No reasons given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 37</i>		
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 308 ref. 37</i>		<i>• No reason given.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 308 ref. 37</i>		<i>• Appropriate to enable consent and consider application on case by case basis, taking RMA Part II into account. • Need to encourage technological developments and innovation.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 308 ref. 37</i>		<i>• Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Amend	Policy 7.D.3 be amended to provide for consenting of discharges where the best practicable option is being employed to reduce the discharge and level of contaminants recognise that in some circumstances Schedule 16 limits will be unobtainable.	<i>• Technological developments and innovation should be encouraged. • Consents should be encouraged where best practicable options are being employed consistent with the NPS Policy A3(b). • Consider each application on its merits and take into account factors relevant under Part II of the RMA.</i>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 309 ref. 37</i>		<i>• No reasons given.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 309 ref. 37</i>		<i>• No reason given.</i>
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Support submission 309 ref. 37</i>		<i>• Agree discharges should be provided for where best practicable option is employed must schedule 16 not met.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 309 ref. 37</i>		<i>• Appropriate to enable consent and consider application on case by case basis, taking RMA Part II into account.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 309 ref. 37</i>		<i>• Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 309 ref. 37</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. • Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations. • Activities should only be prohibited when they have significant adverse environmental effects.</i>
Glen Dene Limited	310	Amend	Policy 7.D.3 be amended to provide for consenting of discharges where the best practicable option is being employed to reduce the discharge and level of contaminants and recognise that in some circumstances Schedule 16 limits will be unobtainable.	<i>• Technological developments and innovation should be encouraged. • Consents should be encouraged where best practicable options are being employed consistent with the NPS Policy A3(b). • Consider each application on its merits and take into account factors relevant under Part II of the RMA.</i>
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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
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 in part submissions 310 - 326 ref. 37</i>		<ul style="list-style-type: none"> • <i>Appropriate to enable consent and consider application on case by case basis, taking RMA Part II into account.</i> • <i>Need to encourage technological developments and innovation.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 37</i>		<ul style="list-style-type: none"> • <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>

38 Section 7.9 - Anticipated environmental results

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alliance Group Limited	187	Amend	Retain Anticipated Environmental Results in Section 7, amended to be consistent with the Plan Change.	<ul style="list-style-type: none"> • Removal creates uncertainty regarding what the proposed provisions set out to achieve. • Unhelpful that all explanatory text removed. • Doesn't assist with simplifying or streamlining. • Inclusion enhances understanding and implementation of various provisions.
<i>Contact Energy Limited</i>	1013	<i>Support submission 187 ref. 38</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 38</i>		<ul style="list-style-type: none"> • <i>Rules need to be certain.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Fish and Game (Central South Island)	273	Oppose	Retain.	<ul style="list-style-type: none"> No link between plan and expected monitoring outcomes. Removal is not necessary and counterproductive.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 273 ref. 38</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality. Affected by a variety of activities, not just agricultural uses. Imposes unnecessary constraints on farming practices.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 273 ref. 38</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Sue Coutts	281	Amend	Section should include an outline of the enforceable quality limits defined by the ORC as a basis for measuring the effectiveness of the policies and methods for achieving the community's goals relating to water quality over the medium to long term.	<ul style="list-style-type: none"> Removing the AERs separates the policies, methods and targets from the broader context that provides for decision making.
Fish and Game (Otago)	287	Oppose	Reinsert the environmental results anticipated.	<ul style="list-style-type: none"> These form the main link between the plan and monitoring, and removal is dangerous, unnecessary and counterproductive.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 38</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality. Affected by a variety of activities, not just agricultural uses. Imposes unnecessary constraints on farming practices.
<i>Central Otago Environmental Society</i>	1028	<i>Support submission 287 ref. 38</i>		<ul style="list-style-type: none"> Objectives have to be measurable. "Anticipated Environmental Results" necessary to establish monitoring and compliance regimes.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 38</i>		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & 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 & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 287 ref. 38</i>		<ul style="list-style-type: none"> • Alliance seeks that the existing Anticipated Environmental Results are retained, incorporating amendments to give effects to the plan change where appropriate, for reasons in its original submission.

49 Section 12.5 - Discharge of drainage water

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Simon Davies	72	Oppose	12.5 Discharge of drainage water should remain in (Water Quality) to the Regional Plan.	<ul style="list-style-type: none"> • This is rural version of stormwater runoff. Water on farms must be allowed to run off into water bodies.

52 Sections 12.A – 12.C - Introduction to discharges of contaminants or water

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Alliance Group Limited	187	Amend	<p>Amend the explanatory note to the rules framework to make it explicit that Section 12.B captures all discharges from industrial and trade premises or associated with the industrial or trade process, and that Section 12.C would not apply in addition to such discharges.</p> <p>This certainty may be provided as follows: "...Section 12.C applies to any other discharge not specifically provided for in Sections 12.A or 12.B. For the avoidance of doubt, Section 12.C does not apply to any discharges that are associated with or ancillary to an activity that is subject to Sections 12.A or 12.B."</p>	<ul style="list-style-type: none"> • Uncertain whether some discharges covered under Section 12.B or 12.C, want certainty within the plan. • Until Section 12.B proposed rules are known is not clear if catch all rule 12.B.4.1 would be applicable.
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 52</i>		<ul style="list-style-type: none"> • Rules need to be certain.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 187 ref. 52</i>		<ul style="list-style-type: none"> • In Silver Fern Farms' original submission we requested clarification to establish which rules would apply to our consented discharge activities. • Silver Fern Farms agree that it is not clear whether some discharge activities (e.g. industrial) would be subject to rule 12B or 12C. More clarity and certainty are required. • Silver Fern Farms supports the amendments sought by submitter # 187 to clarify that Section 12.C does not apply to any discharges that are associated with or ancillary to an activity that is subject to Sections 12.A or 12.B.
NZ Transport Agency	203	Amend	Revise rules to clarify the status of activities.	<ul style="list-style-type: none"> • Guidance notes should be rules to provide legal weight. • Clarity is necessary re stormwater from surfaces such as roads. • Rules 12.B.1.8 and 12.B.1.9 provide for stormwater discharges but rules in 12.C.0 prohibit discharges that have such effects. • Priority of prohibited activities over permitted activities unless otherwise specified.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 203 ref. 52</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 203 ref. 52</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 52</i>		<ul style="list-style-type: none"> • No reasons given.
<i>City Forests</i>	1071	<i>Support submission 203 ref. 52</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>Oceana Gold (NZ) Limited</i>	1072	<i>Support submission 203 ref. 52</i>		<ul style="list-style-type: none"> • Rules inconsistent regarding the default discretionary rule 12.B.4.2 and the link to 12.C rules. • Relationship between 12.B and 12.C rules should be clarified. • 12.C rules should not apply to mining and ancillary activities.
Trustpower Limited	206	Amend	Amend the explanation of the rules framework as follows: "Section 12C applies to any other discharges not specifically provided for in section 12A or 12B, including discharges associated with renewable electricity generation".	<ul style="list-style-type: none"> • Certainty for which rules apply to renewable electricity generation activities.
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 52</i>		<ul style="list-style-type: none"> • Supports the alternative position requested by Meridian, should Contact's primary submission not be accepted. • Would make the position clearer.
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 52</i>		<ul style="list-style-type: none"> • Explanation of the rule framework should be amended. • Provides certainty as to which rules apply to renewable electricity generation activities.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Silver Fern Farms Limited	238	Did not specify	Clarification that the Silver Fern Farms discharge (as discharge of a contaminant from an industrial or trade premises) is subject to section 12B, rather than 12C.	<ul style="list-style-type: none"> • Queries if their interpretation is correct.
Contact Energy Limited	284	Amend	Amend the Introduction to sections 12.A-12.C describing how the rule framework applies to state that section 12.B applies to discharges from "industrial or trade premises or associated with infrastructure activities"	<ul style="list-style-type: none"> • Not clear if hydro structures are industrial or trade premises.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 284 ref. 52</i>		<ul style="list-style-type: none"> • Supports the explanation of rule frameworks in circumstances where the rule framework is not explicitly linked via each activity status rule. • Discharges associated with infrastructure activities should be treated the same as industrial or trade premises.
<i>TrustPower</i>	1059	<i>Support submission 284 ref. 52</i>		<ul style="list-style-type: none"> • Not clear whether hydro structures are covered under Section 12.B or Section 12.C. • In original submission, Trustpower suggested retaining existing rules 12.12.11 and 12.12.12 to provide for hydro structures.
<i>Oceana Gold (NZ) Limited</i>	1072	<i>Support in part submission 284 ref. 52</i>		<ul style="list-style-type: none"> • Clarification is needed around application of rules for activities associated with an industrial or trade premise. Is unclear if 12.B rules cover work at a mine site before mining commences. • 12.B rules should apply to all mine site operations.

54.1 Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, other specified contaminants, stormwater and from industrial and trade premises

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Grant Bradfield	131	Support	Support.	<ul style="list-style-type: none"> • No reason given.
Contact Energy Limited	284	Amend	Amend the heading to section 12.B to read: "Discharge of hazardous substances, hazardous wastes, other specified contaminants, stormwater, or from industrial or trade premises or associated with infrastructure activities."	<ul style="list-style-type: none"> • Not clear if hydro structures are industrial or trade premises.
<i>TrustPower</i>	1059	<i>Support submission 284 ref. 54.1</i>		<ul style="list-style-type: none"> • Not clear whether hydro structures are covered under Section 12.B or Section 12.C. • In original submission, Trustpower suggested retaining existing rules 12.12.11 and 12.12.12 to provide for hydro structures.
Central Otago District Council & Clutha District Council	309	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Context within which rules will be applied has changed. • Implications for submitters in relation to municipal waste and stormwater discharge consents.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 54.1</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 54.1</i>		<ul style="list-style-type: none"> • No reason given.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 54.1</i>		<ul style="list-style-type: none"> • Seek that the submission be allowed and the Plan Change amended as per the submission.
Calder Stewart Industries Limited	313	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Context within which rules will be applied has changed. • Implications for submitters in relation to stormwater discharges from work sites and quarry operations.

54.2 Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, stormwater and other specified contaminants, and discharges from industrial and trade premises

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Helen Constance	2	Not Applicable	Keep all spraying of waterways 'off-limit' and use the balance of ecological means instead.	• Ecological balance gives good quality water.
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 2 ref. 54.2</i>		• <i>Impractical and unworkable.</i>
Michael O'Connor	234	Not Applicable	Delete herbicides, pesticides and water.	• Who decides what a contaminant is?
4650 Matarae Station Ltd	264	Not Applicable	Changes to 12.B to include a list herbicides which can be used on noxious weeds around waterways without consent.	• Need to control noxious weeds efficiently without applying for consent.
Contact Energy Limited	284	Not Applicable	Amend the rules in section 12.B so that wherever reference is made to discharges from industrial and trade premises, the rule is expanded to apply to "industrial or trade premises or associated with infrastructure activities"	• Not clear if hydro structures are industrial or trade premises.
<i>TrustPower</i>	1059	<i>Support submission 284 ref. 54.2</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>Oceana Gold (NZ) Limited</i>	1072	<i>Support in part submission 284 ref. 54.2</i>		• <i>Clarification is needed around application of rules for activities associated with an industrial or trade premise. Is unclear if 12.B rules cover work at a mine site before mining commences.</i> • <i>12.B rules should apply to all mine site operations.</i>

55.2 Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Not Applicable	No decision requested.	• Gel is not a good controlling agent. • Experience is too limited.
Clutha Agricultural Development Board	139	Not Applicable	Wording of 12.B.1.1 should read - "...by a person who holds a current qualification for the application of agricultural chemicals."	• Equivalent qualifications acceptable for agrichemicals handling aside from Growsafe.
Dunedin City Council	211	Not Applicable	Retain.	• Contributes to ongoing operation and maintenance of existing resources. • Concerns that rule may be reviewed in future to link to new policies in Chapter 7, Schedules 15 and 16.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 55.2</i>		• <i>No reason given.</i>
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (f)(ii).	• No reason given.
Ravensdown Fertiliser Co-operative Ltd	248	Not Applicable	Support intent of rule.	• Standards are considered to be generally pragmatic and practical.
New Zealand Fertiliser Manufacturers Research Association Inc	252	Not Applicable	Support intent of rule.	• Standards are considered to be generally pragmatic and practical.
Ballance Agri-Nutrients Ltd	262	Not Applicable	Support intent of rule.	• Standards are considered to be generally pragmatic and practical.
Horticulture New Zealand	269	Not Applicable	Amend Rule 12.B.1.1 to include compliance with NZS8409 qualifications as follows: "The discharge is carried out only by persons holding either: a) a GROWSAFE Registered Chemical Applicators Certificate (National Certificate in Agrichemical Aquatic strand) or	• Correct name is GROWSAFE Registered Chemicals Applicators Certificate. • Applicators should have the agrichemical aquatic strand. • Should include a qualification requirement for aerial operators.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			GROWSAFE Introductory Certificate and under direct supervision of GROWSAFE Registered Chemical Applicators Certificate (National Certificate in Agrichemical Aquatic strand) (b) Aerial application - The pilot must hold a GROWSAFE Pilots Agrichemical Rating Certificate issued in accordance with Civil Aviation Rule Part 61 and the application company must hold AIRCARE Accreditation The discharge shall be undertaken in a manner consistent with NZS8409:2004 Management of Agrichemicals."	
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 55.2</i>		<ul style="list-style-type: none"> • <i>Appropriate to include compliance with NZ Standards.</i>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 55.2</i>		<ul style="list-style-type: none"> • <i>Measurement process to establish N level/ha unworkable.</i> • <i>Landuse management not the ORC's role.</i> • <i>Cost to implement the plan change will be huge.</i> • <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>
Federated Farmers of New Zealand	278	Not Applicable	Supports the intent of rule and seeks that they be adopted.	<ul style="list-style-type: none"> • Provides for applications to take place in accordance with good practice and guidelines.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 55.2</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 55.2</i>		<ul style="list-style-type: none"> • <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. 55.2</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 55.2</i>		<ul style="list-style-type: none"> • <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>
The Director-General of Conservation	306	Not Applicable	Retain as notified.	<ul style="list-style-type: none"> • Enables the control of aquatic plants by the application of herbicide.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 55.2</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 55.2</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 55.2</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 55.2</i>		<ul style="list-style-type: none"> • <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>Hawkdun Station</i>	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Glenshee Station Limited	1062	Oppose submission 306 ref. 55.2		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 55.2		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.

56.2 Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (e).	<ul style="list-style-type: none"> • No reason given.
Ravensdown Fertiliser Co-operative Ltd	248	Not Applicable	Supports in principle the intent of Rules 12.B.1.2 - [but] seeks the following amendment to (e); "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"> • Support intent of rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
New Zealand Fertiliser Manufacturers Research Association Inc	252	Not Applicable	Supports in principle the intent of Rules 12.B.1.2 - [but] seeks the following amendment to (e); "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"> • Support intent of the rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
Ballance Agri-Nutrients Ltd	262	Not Applicable	Supports in principle the intent of Rules 12.B.1.2 - [but] seeks the following amendment to (e); "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"> • Support intent of the rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
Horticulture New Zealand	269	Amend	<p>Amend Rules 12.B.1.2 and 12.B.1.3 by adding conditions as follows:</p> <p>"The discharge shall be undertaken in a manner consistent with NZS8409:2004 Management of Agrichemicals and for specific activities compliance with the following sections NZS8409:2004 Management of Agrichemicals:</p> <ul style="list-style-type: none"> - Storage - Appendix L4 - Use - Part 5.3 - Disposal - Appendix S - Records - Appendix C9 <p>Training and qualifications:</p>	<ul style="list-style-type: none"> • No requirement for training for land-based applications. • Best management practice achieved through compliance with NZ8409:2004 and GROWSAFE training programme.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Where the application is undertaken by a contractor for hire and reward the following qualifications must be held: (i) Ground based application Either GROWSAFE Registered Chemical Applicators Certificate Or GROWSAFE Introductory Certificate and under direct supervision of GROWSAFE Registered Chemical Applicators Certificate (ii) All other users (other than domestic) must hold a GROWSAFE Introductory Certificate or be under direct supervision of a person holding a GROWSAFE Applied Certificate or Registered Chemical Applicators Certificate"	
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 56.2</i>		<ul style="list-style-type: none"> • <i>Appropriate to include compliance with NZ Standards.</i>
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 56.2</i>		<ul style="list-style-type: none"> • <i>Measurement process to establish N level/ha unworkable.</i> • <i>Landuse management not the ORC's role.</i> • <i>Cost to implement the plan change will be huge.</i> • <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>
Federated Farmers of New Zealand	278	Not Applicable	Adopt with the following amendment to (e) or words to that effect: "...or no damage to indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, resulting directly from the activity that is subject to this rule."	<ul style="list-style-type: none"> • Provides for applications to take place in accordance with good practice and guidelines. • Clause causes uncertainty in how rule is applied, and part of it not directly relevant to rule.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 56.2</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 56.2</i>		<ul style="list-style-type: none"> • <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. 56.2</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 56.2</i>		<ul style="list-style-type: none"> • <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>
The Director-General of Conservation	306	Not Applicable	That 12.B.1.2(e) be amended as follows, or to like effect: "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."	<ul style="list-style-type: none"> • Purpose of land based application of pesticide is to kill exotic pest fauna. • Rule requires a consent for such an application.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 56.2</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 56.2</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>

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. 56.2		<ul style="list-style-type: none"> No reason given.
Moutere Station Limited	1052	Oppose submission 306 ref. 56.2		<ul style="list-style-type: none"> Very wide changes sought without evidence of environmental impact, including land management practice. Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. Shouldn't restrict necessary farming discharges. No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Hawkdun Station	1053			
Glenshee Station Limited	1062	Oppose submission 306 ref. 56.2		<ul style="list-style-type: none"> Opposes the support in DoC's submission for reasons in Glenshee's original submission.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 56.2		<ul style="list-style-type: none"> 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. Rules fail relevant tests under section 32 RMA. Additional controls not justified in terms of effects. Seek the submission be disallowed.

57.2 Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Not Applicable	Permit weed spraying adjacent to irrigation races.	<ul style="list-style-type: none"> Control noxious plants.
Dunedin City Council	211	Not Applicable	Retain.	<ul style="list-style-type: none"> Contributes to ongoing operation and maintenance of existing resources. Concerns that rule may be reviewed in future to link to new policies in Chapter 7, Schedules 15 and 16.
Strath Taieri Community Board	1029	Support submission 211 ref. 57.2		<ul style="list-style-type: none"> No reason given.
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (f)(ii) and (g).	<ul style="list-style-type: none"> No reason given.
Ravensdown Fertiliser Co-operative Ltd	248	Not Applicable	Supports in principle the intent of Rules 12.B.1.3- [but] seeks the following amendment to (g); "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"> Support intent of rule but opposes ambiguity of (g). Amendment of rule is needed for clarity.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
Ballance Agri-Nutrients Ltd	262			
Horticulture New Zealand	269	Not Applicable	Amend Rules 12.B.1.2 and 12.B.1.3 by adding conditions as follows: "The discharge shall be undertaken in a manner consistent with NZS8409:2004 Management of Agrichemicals and for specific activities compliance with the following sections NZS8409:2004	<ul style="list-style-type: none"> No requirement for training for land based applications. Best management practice achieved through compliance with NZ8409:2004 and GROWSAFE training programme.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>Management of Agrichemicals:</p> <ul style="list-style-type: none"> - Storage - Appendix L4 - Use - Part 5.3 - Disposal - Appendix S - Records - Appendix C9 <p>Training and qualifications: Where the application is undertaken by a contractor for hire and reward the following qualifications must be held:</p> <p>(i) Ground based application Either GROWSAFE Registered Chemical Applicators Certificate Or GROWSAFE Introductory Certificate and under direct supervision of GROWSAFE Registered Chemical Applicators Certificate</p> <p>(ii) All other users (other than domestic) must hold a GROWSAFE Introductory Certificate or be under direct supervision of a person holding a GROWSAFE Applied Certificate or Registered Chemical Applicators Certificate".</p>	
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 57.2</i>		<ul style="list-style-type: none"> • <i>Appropriate to include compliance with NZ Standards.</i>
<i>Ettrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 57.2</i>		<ul style="list-style-type: none"> • <i>Measurement process to establish N level/ha unworkable.</i> • <i>Landuse management not the ORC's role.</i> • <i>Cost to implement the plan change will be huge.</i> • <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>
Forest and Bird	271	Not Applicable	Amend to read: "(g) 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."	<ul style="list-style-type: none"> • Requiring consent to use herbicides to kill exotic pests imposes extra and unnecessary burden.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 57.2</i>		<ul style="list-style-type: none"> • <i>Not all waterways need to be enhanced.</i>
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 271 ref. 57.2</i>		<ul style="list-style-type: none"> • <i>Opposes consenting requirement to use herbicides to kill exotic pests.</i> • <i>Unnecessary burden.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 271 ref. 57.2		<ul style="list-style-type: none"> • Appropriate to restrict to indigenous to enable removal of exotic weeds.
<i>Glenshee Station Limited</i>	1062	Oppose submission 271 ref. 57.2		<ul style="list-style-type: none"> • 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	Not Applicable	Adopt with the following amendment to (g) or words to that effect: "...or no damage to indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, resulting directly from the activity that is subject to this rule."	<ul style="list-style-type: none"> • Provides for applications to take place in accordance with good practice and guidelines. • Clause causes uncertainty in how rule is applied, and part of it not directly relevant to rule.
<i>Albert McTainsh</i>	1004	Support submission 278 ref. 57.2		<ul style="list-style-type: none"> • Practical and workable alternatives, solutions and suggestions.
<i>Hopefield Investments Ltd</i>	1019	Support submission 278 ref. 57.2		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	Support submission 278 ref. 57.2		<ul style="list-style-type: none"> • No reason given.
<i>Glenshee Station Limited</i>	1062	Support in part submission 278 ref. 57.2		<ul style="list-style-type: none"> • 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.
The Director-General of Conservation	306	Not Applicable	That 12.B.1.3(g) be amended as follows, or to like effect: "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."	<ul style="list-style-type: none"> • Purpose of land based application of pesticide is to kill exotic pest flora. • Rule requires a consent for such an application.
<i>Craiglea Limited</i>	1012	Oppose submission 306 ref. 57.2		<ul style="list-style-type: none"> • No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • No need for further restrictions on discharges.
<i>Hopefield Investments Ltd</i>	1019	Oppose submission 306 ref. 57.2		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	Oppose submission 306 ref. 57.2		<ul style="list-style-type: none"> • No reason given.
<i>Moutere Station Limited</i>	1052	Oppose submission 306 ref. 57.2		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes &
<i>Hawkdun Station</i>	1053	Oppose submission 306 ref. 57.2		

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. Shouldn't restrict necessary farming discharges. No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Glenshee Station Limited	1062	Oppose submission 306 ref. 57.2		<ul style="list-style-type: none"> Opposes the support in DoC's submission for reasons in Glenshee's original submission.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 57.2		<ul style="list-style-type: none"> 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. Rules fail relevant tests under section 32 RMA. Additional controls not justified in terms of effects. Seek the submission be disallowed.

58.2 Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Hawkdun Idaburn Irrigation Company Ltd	70	Not Applicable	Permit weed spraying adjacent to irrigation races.	<ul style="list-style-type: none"> Control noxious plants.
Ernslaw One Ltd	149	Not Applicable	12.B.1.4 (d) - Replace the 20 m 'discharge prevention setback' to align with industry best practice of 5 m, when and only when using helicopter operators who are third parties accredited by the NZ Aviation Industry Association to the 'Aircare' Environmental Certification programme, and who hold 'Growsafe' certification compliant with the NZ Standard for Management of Agrichemicals (NZS8409:2004).	<ul style="list-style-type: none"> Landowners applying fertiliser are not required to maintain any particular buffer, only to minimise discharge. Application should be consistent with industry best practice standards.
Hopefield Investments Ltd (R Griffiths)	200	Not Applicable	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"> Costs associated with compliance. Proposed time frames insufficient. Unknown implementation management of changes by ORC.
Federated Farmers of New Zealand	1057	Support submission 200 ref. 58.2		<ul style="list-style-type: none"> 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.
NZ Agricultural Aviation Association	204	Not Applicable	Amend Rule 12.B.1.,4 (b) qualifications as follows The pilot must hold a GROWSAFE ³ Pilots Agrichemical Rating Certificate issued in accordance with Civil Aviation Rule Part 61 and the application company must hold AIRCARE ³ Accreditation.	<ul style="list-style-type: none"> The requirement in Condition (b) is no longer correctly named. It should include AIRCARE³ Accreditation which guarantees the operator is meeting best practice standards in accordance with NZS8409:2004 and requirements of the aerial industry.
Blakely Pacific Limited	209	Not Applicable	Replace the 20 m 'discharge prevention setback' to align with industry best practice of 5 m, when using helicopter operators who are third parties accredited by the NZ Aviation Industry Association to the 'Aircare' Environmental Certification programme, and who hold 'Growsafe' certification compliant with the NZ Standard for Management of Agrichemicals (NZS8409:2004).	<ul style="list-style-type: none"> Application should be consistent with industry best practice standards.
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (e).	<ul style="list-style-type: none"> No reason given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ravensdown Fertiliser Co-operative Ltd	248	Not Applicable	Supports in principle the intent of Rules 12.B.1.4 - [but] seeks the following amendment to (e): "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"> • Support intent of rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
Rayonier New Zealand Ltd	256	Not Applicable	Replace the 20 m "discharge prevention setback" in rule (d) to align with industry best practice of 5 m, when using helicopter operators who hold "Growsafe" certification or are third parties accredited by the NZ Aviation Industry Association to the "Aircare" Environmental Certification programme, and compliant with the NZ Standard for Management of Agrichemicals (NZS8409: 2004).	<ul style="list-style-type: none"> • Oppose (b). • If buffer to be applied, should be consistent with this standard, as provisionally defined in the NES.
Ballance Agri-Nutrients Ltd	262	Not Applicable	Supports in principle the intent of Rules 12.B.1.4 - [but] seeks the following amendment to (e): "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"> • Support intent of the rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
Horticulture New Zealand	269	Not Applicable	Amend Rule 12.B.1.4 b) qualifications as follows: "The pilot must hold a GROWSAFE Pilots Agrichemical Rating Certificate issued in accordance with Civil Aviation Rule Part 61 and the application company must hold AIRCARE Accreditation."	<ul style="list-style-type: none"> • Does not contain correct name of the GROWSAFE qualification. • Requirement should also include the AIRCARE accreditation.
<i>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 58.2</i>		<ul style="list-style-type: none"> • <i>Measurement process to establish N level/ha unworkable.</i> • <i>Landuse management not the ORC's role.</i> • <i>Cost to implement the plan change will be huge.</i> • <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>
Forest and Bird	271	Not Applicable	Amend to read: "(e) 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."	<ul style="list-style-type: none"> • Requiring consent to use herbicides to kill exotic pests imposes extra and unnecessary burden.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 58.2</i>		<ul style="list-style-type: none"> • <i>Not all waterways need to be enhanced.</i>
<i>Mr RJ Borst</i>	1034	<i>Support in part submission 271 ref. 58.2</i>		<ul style="list-style-type: none"> • <i>Opposes consenting requirement to use herbicides to kill exotic pests.</i> • <i>Unnecessary burden.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Support submission 271 ref. 58.2</i>		<i>• Appropriate to restrict to indigenous to enable removal of exotic weeds.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 58.2</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	Not Applicable	Adopt with the following amendment to (e) or words to that effect: "...or no damage to indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, resulting directly from the activity that is subject to this rule."	<ul style="list-style-type: none"> • Provides for applications to take place in accordance with good practice and guidelines. • Clause causes uncertainty in how rule is applied, and part of it not directly relevant to rule.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 58.2</i>		<i>• Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 58.2</i>		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 58.2</i>		<i>• No reason given.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 58.2</i>		<ul style="list-style-type: none"> • 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.
Wenita Forest Products	279	Not Applicable	12.B.1.4 (d) - Replace the 20 m 'discharge prevention setback' to align with industry best practice of 5 m.	<ul style="list-style-type: none"> • Landowners applying fertiliser are not required to maintain any particular buffer, only to minimise discharge. • Application should be consistent with industry best practice standards.
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Not Applicable	12.B.1.4 (d) - Replace the 20 m 'discharge prevention setback' to align with industry best practice of 5 m.	<ul style="list-style-type: none"> • Landowners applying fertiliser are not required to maintain any particular buffer, only to minimise discharge. • Application should be consistent with industry best practice standards. • 5m setback aligns with ECOP for Plantation forestry.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 282 ref. 58.2</i>		<ul style="list-style-type: none"> • Consistency with Codes of Practice. • Objective is to minimise discharge not maintain buffer.
City Forests Limited	283	Not Applicable	12.B.1.4 (d) - Replace the 20 m 'discharge prevention setback' to align with industry best practice of 5 m, when and only when using helicopter operators who are third parties accredited by the NZ Aviation Industry Association to the 'Aircare' Environmental Certification programme, and who hold 'Growsafe' certification compliant with the NZ Standard for Management of Agrichemicals (NZS8409:2004).	<ul style="list-style-type: none"> • Landowners applying fertiliser are not required to maintain any particular buffer, only to minimise discharge. • Application should be consistent with industry best practice standards.
Southern Wood Council	289			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 283 and 289 ref. 58.2</i>		<ul style="list-style-type: none"> • Consistency with Codes of Practice. • Objective is to minimise discharge not maintain buffer.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
The Director-General of Conservation	306	Not Applicable	That 12.B.1.4(e) be amended as follows, or to like effect: "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."	<ul style="list-style-type: none"> • Purpose of land based application of pesticide is to kill exotic pest fauna. • Rule requires a consent for such an application.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 58.2</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 58.2</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 58.2</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 58.2</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Hawkdun Station</i>	1053			
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 58.2</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 58.2</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>

59 Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
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"> • Proposed time frame places inequitable financial burden on pastoral farmers. • Will devalue ORC's primary sector rating base. • Inhibit development and enhancement of resources unless financial assistance granted to landholders.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 45 ref. 59</i>		<ul style="list-style-type: none"> • <i>Concerns with workability.</i> • <i>Despite precautions may still breach rules, making scheme unworkable with financial costs.</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"> • Have a Regionally Significant Wetland. • Use minimal fertiliser on land. • Every farm has different circumstances and a lot of our swamp is at times

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				dryland.
<i>Federated Farmers of New Zealand</i>	1057	Support submission 59 ref. 59		<ul style="list-style-type: none"> Concerns with workability. Despite precautions may still breach rules, making scheme unworkable with financial costs.
S H Andrews and Sons Ltd	61	Oppose	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"> Potentially threaten ability to farm. Water draining our farm is reasonable quality. Will not accept responsibility for degraded water entering property from neighbours.
<i>Federated Farmers of New Zealand</i>	1057	Support submission 61 ref. 59		<ul style="list-style-type: none"> Concerns around accountability where degraded water comes from neighbouring areas. Despite precautions may still breach rules.
Green Party (Dunedin Branch)	62	Amend	For dairy farms make mandatory the requirement to produce fertiliser management budgets for ORC approvals.	<ul style="list-style-type: none"> Farming practice which would help meet water quality standards.
<i>Craiglea Limited</i>	1012	Oppose submission 62 ref. 59		<ul style="list-style-type: none"> Inappropriate to require ORC to manage fertiliser budgets.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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	Oppose submission 62 ref. 59		<ul style="list-style-type: none"> Unnecessarily restrictive. Proposed plan change adequately addresses adverse effects.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	Support submission 62 ref. 59		<ul style="list-style-type: none"> Ensures contaminants being discharged directly or indirectly are reduced.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Oppose submission 62 ref. 59		<ul style="list-style-type: none"> Does not allow flexibility for existing farming operations to give effect to the NPS. Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime. Does take into account local environmental conditions and economic/development consideration.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • <i>Disproportionate and overly restrictive.</i>
Loganbrae Ltd	75	Amend	Needs to be a discretionary activity.	<ul style="list-style-type: none"> • Have a Regionally Significant Wetland. • Use minimal fertiliser on land. • Every farm has different circumstances and a lot of our swamp is at times dryland.
Glen Ayr Ltd (D & C Dundass)	76	Amend	Needs to be a discretionary activity.	<ul style="list-style-type: none"> • Concerned about implications for significant wetlands. • Do not apply fertiliser. • Farming practices differ between farms e.g. Sheep/beef compared to dairy.
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"> • Proposed timeframe for change places inequitable financial burden upon pastoral farmers. • Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources.
Eloise Neeley	141	Oppose	Opposition in relation to reference to Rule 12.C.1.3.	<ul style="list-style-type: none"> • Longer transition times with education and collaboration would get better result. • Overseer not used by all farmers so in order to know if compliant have to use this programme. Version 6 still in development stage. • Even with best practice some farmers will fail to meet requirements leading to fear and suspicion, not the intent of the plan change.
New Zealand Pork Industry Board	145	Support	Retain Rule 12b.1.5(d).	<ul style="list-style-type: none"> • No reason given.
Gerard Booth	159	Oppose	This rule should be delayed until more environmental and economic research has been done.	<ul style="list-style-type: none"> • More research needed.
Jeremy Wales	194	Oppose	This rule is unnecessary.	<ul style="list-style-type: none"> • Intrusion on to private property rights.
Dairy Holdings Limited	195	Amend	Supports the permitted activity status of the discharge of fertiliser to production land. Opposed to the reference to 12.C.1.3 and considers it should be deleted. Rule 12.B.1.5(c) needs to be amended to accommodate effects that are appropriately "avoided, remedied or mitigated" with no more than minor effects. Provision should also be made for positive effects. Consideration should be given to including and defining what "best practice" is rather than complying per se with the manufacturer's instructions. In the alternative the whole rule should be deleted.	<ul style="list-style-type: none"> • Rule 12.C.1.3 of significant concern. • Rule 12.B.1.5(d) expressed on absolute basis, unclear if it could be achieved in reality. Proposals which have positive effects on wetlands could be prevented. • Lack of clarity around "manufacturer's instructions", are they available for all fertilisers, can and should they be complied with in all circumstances, what fertilisers covered by rule.
<i>Waitaki Irrigators Collective Limited</i>	<i>1031</i>	<i>Support submission 195 ref. 59</i>		<ul style="list-style-type: none"> • <i>Submission outlines concern of further submitter.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 195 ref. 59</i>		<ul style="list-style-type: none"> • <i>Despite precautions may still breach rules, making scheme unworkable with financial costs.</i>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Support in part submission 195 ref. 59</i>		<ul style="list-style-type: none"> • <i>Support in part, particularly regarding wider effect of the plan change.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 195 ref. 59</i>		<ul style="list-style-type: none"> • <i>Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
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"> 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. 59</i>		<ul style="list-style-type: none"> 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.
Vivienne & Greg Kerr	213	Support	Support addition of (c).	<ul style="list-style-type: none"> No reason given.
Alan Grant Macgregor	215	Amend	Amend the rule to exclude condition (d) (It meets the provisions of Rule 12.C.1.3).	<ul style="list-style-type: none"> Lack of researched data to support proposed Nitrogen loading limits.
Michael O'Connor	234	Oppose	Delete fertiliser.	<ul style="list-style-type: none"> Fertiliser not a contaminant, soil and plant enhancers.
Viewmont Limited	247	Amend	Amend rule to exclude condition (d) due to the link to Rule 12.C.1.3.	<ul style="list-style-type: none"> Lack of researched data to support nitrogen load limits outlined in Rule 12.C.1.3.
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Supports in principle the intent of Rules 12.B.1.5 - [but] seeks the following amendment to (c); "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". Supports the permitted activity status of the discharge of fertiliser to production land (in circumstances where it may enter water), it opposes Rule 12.B. 1.5 (d) and seeks its deletion.	<ul style="list-style-type: none"> Support intent of the rule but opposes ambiguousness of (c). Amendment of rule is needed for clarity. 12.B.1.5(d) is confusing and unnecessary and provisions in 12.C.1.3 can stand alone. Does rule have effect now or when 12.C.1.3 takes effect in 2019.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 248 ref. 59</i>		<ul style="list-style-type: none"> For the reasons given by the submitter.
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 59</i>		<ul style="list-style-type: none"> Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Waihemo Water Catchment Society Inc	250	Oppose	Rule should be deleted.	<ul style="list-style-type: none"> • Impracticable • Doesn't take into account land contour etc. • Insufficient time allowed for researching these planned changes and proposals.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 250 ref. 59</i>		<ul style="list-style-type: none"> • <i>Despite precautions may still breach rules, making scheme unworkable with financial costs.</i>
New Zealand Fertiliser Manufacturers Research Association Inc	252	Amend	<p>Supports in principle the intent of Rules 12.B.1.5 - [but] seeks the following amendment to (c); "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".</p> <p>Supports the permitted activity status of the discharge of fertiliser to production land (in circumstances where it may enter water), it opposes Rule 12.B. 1.5 (d) and seeks its deletion.</p>	<ul style="list-style-type: none"> • Support intent of the rule but opposes ambiguousness of (c). • Amendment of rule is needed for clarity. • 12.B.1.5(d) is confusing and unnecessary and provisions in 12.C.1.3 can stand alone. • Does rule have effect now or when 12.C.1.3 takes effect in 2019.
<i>Mr RJ Borst</i>	1034	<i>Support submission 252 ref. 59</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Waitaki Irrigators Collective Limited	257	Amend	Re-word to allow the use of mitigation options such as created wetlands.	<ul style="list-style-type: none"> • Does not allow for some mitigation to minimise potential negative effects, e.g. Wetlands. • Current wording means fertiliser entering wetland is not permitted - a wetland is a water body.
Ballance Agri-Nutrients Ltd	262	Amend	<p>Supports in principle the intent of Rules 12.B.1.5 - [but] seeks the following amendment to (c); "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".</p> <p>Supports the permitted activity status of the discharge of fertiliser to production land (in circumstances where it may enter water), it</p>	<ul style="list-style-type: none"> • Support intent of the rule but opposes ambiguousness of (c). • Amendment of rule is needed for clarity. • 12.B.1.5(d) is confusing and unnecessary and provisions in 12.C.1.3 can stand alone. • Does rule have effect now or when 12.C.1.3 takes effect in 2019.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			opposes Rule 12.B. 1.5 (d) and seeks its deletion.	
<i>Mr RJ Borst</i>	1034	Support submission 262 ref. 59		<ul style="list-style-type: none"> • Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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			
Horticulture New Zealand	269	Amend	Delete new condition d) from Rule 12.B.1.5.	<ul style="list-style-type: none"> • Approach is not supported.
<i>Eitrick Fruitgrowers Association Inc</i>	1067	Support submission 269 ref. 59		<ul style="list-style-type: none"> • Measurement process to establish N level/ha unworkable. • Landuse management not the ORC's role. Blanket restriction on N levels inappropriate and restrictive on horticultural land use, and unnecessary at proposed levels. • Cost to implement the plan change will be huge. • Mapped Eitrick and Roxburgh aquifers no homogeneous, geological nature variable. 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.
Fish and Game (Central South Island)	273	Amend	Amend the conditions for the activity to be permitted to include: "There shall be no fertiliser visible on the ground or groundcover immediately following the discharge, within 10 metres from: (i) the bed of a permanently flowing river, or (ii) the bed of a lake, or (iii) a wetland boundary."	<ul style="list-style-type: none"> • Setbacks required to reduce risk of run-off. • Ensures compliance can be determined.
<i>Craiglea Limited</i>	1012	Oppose submission 273 ref. 59		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
<i>Otago Water Resource Users Group</i>	1056	Oppose submission 273 ref. 59		<ul style="list-style-type: none"> • Discharge is the issue, not visibility. • Discharge already addressed by the Proposed Plan Change.
<i>Federated Farmers of New Zealand</i>	1057	Oppose submission 273 ref. 59		<ul style="list-style-type: none"> • Would have significant impact on farming. • Lack of scientific basis.
Federated Farmers of New Zealand	278	Amend	Adopt permitted activity rule 12.B.1.5 following the deletion of (c) and (d).	<ul style="list-style-type: none"> • Concerned with limits imposed by Rule 12.C.1.3. • Clause causes uncertainty in how rule is applied, and part of it not directly

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> relevant to rule. Taking an effect-based approach, application of fertiliser should not be linked to the nitrogen loss limits outlined in 12.C.1.3 - nitrogen loss from the root zone to groundwater can come from a number of other sources. Link is too uncertain and too difficult to administer and or enforce.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 59</i>		<ul style="list-style-type: none"> <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 59</i>		<ul style="list-style-type: none"> <i>Regionally Significant Wetlands need to be protected from adverse effects of fertiliser and nutrients.</i> <i>Fertiliser and nutrients reduce water quality and change biodiversity values.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 59</i>		<ul style="list-style-type: none"> <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. 59</i>		<ul style="list-style-type: none"> <i>No reason given.</i>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 278 ref. 59</i>		<ul style="list-style-type: none"> <i>Regionally significant wetlands need to be protected from adverse effects associated with adding fertiliser and nutrients as these have the potential to reduce water quality and change biodiversity values.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 59</i>		<ul style="list-style-type: none"> <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>
Janefield Farm	296	Amend	Would like to see 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"> Future viability of farms in sensitive zone. Not all farmers familiar with Overseer, so do not know if they comply. Version 6 not available. Need longer lead in time, working collaboratively with farmers.
<i>Albert McTainsh</i>	1004	<i>Support submission 296 ref. 59</i>		<ul style="list-style-type: none"> <i>Provides science-based, workable and practical suggestions.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 296 ref. 59</i>		<ul style="list-style-type: none"> <i>Concerned with impact when unable to achieve limits despite using best practice.</i> <i>More work on limits supported.</i>
Andrea Clarke	305	Amend	Rule 12.B.1.5 (a) needs to be clearly defined in additional supporting information or the appendix of the plan.	<ul style="list-style-type: none"> To ensure landowners have clear understanding of what is required to implement rule and meet their obligations.
Lake Edge Farms Ltd	333	Oppose	Opposes (c) in how it relates to Regionally Significant Wetland.	<ul style="list-style-type: none"> Concern about not being able to graze wetland. Wetland only ever has sheep and they have very little impact.

60 Rule 12.B.1.6 / 12.11.2.1 - Sullage, cooling water, drinking supply, pool discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (f).	<ul style="list-style-type: none"> No reason given.
Silver Fern Farms Limited	238	Not Applicable	These inconsistencies [re mixing zones] need to be rectified.	<ul style="list-style-type: none"> (b) and (d) allow reasonable mixing. Further inconsistencies.
Forest and Bird	271	Not Applicable	Retain as publicly notified.	<ul style="list-style-type: none"> Provides appropriate protection for ensuring maintenance of water quality.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271</i>		<ul style="list-style-type: none"> <i>Not all waterways need to be enhanced.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 60</i>		
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 60</i>		<ul style="list-style-type: none"> • <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>
The Director-General of Conservation	306	Not Applicable	Retain as publicly notified.	<ul style="list-style-type: none"> • Will ensure water quality is maintained.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 60</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 60</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 60</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 60</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Hawkdun Station</i>	1053			
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 60</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 60</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>

61 Rule 12.B.1.7 / 12.11.2.2 - Live organisms water discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (a).	<ul style="list-style-type: none"> • No reason given.

62 Rule 12.B.1.8 / 12.4.1.1 - Stormwater reticulated discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
NZ Transport Agency	203	Not Applicable	Retain Rule 12.B.1.8.	<ul style="list-style-type: none"> • Retaining provides for on-going operation and maintenance of resources such as roads.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 62</i>		• <i>No reasons given.</i>
Dunedin City Council	211	Not Applicable	Retain.	<ul style="list-style-type: none"> • Contributes to ongoing operation and maintenance of existing resources. • Concerns that rule may be reviewed in future to link to new policies in Chapter 7, Schedules 15 and 16.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 62</i>		• <i>No reason given.</i>
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (a)(i).	• No reason given.
Forest and Bird	271	Not Applicable	Retain 12.B.1.8 (a)(i) as publicly notified.	• Supports as notified.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 62</i>		• <i>Not all waterways need to be enhanced.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 62</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>
The Director-General of Conservation	306	Not Applicable	Retain 12.B.1.8(a)(i) as publicly notified. Amend 12.B.1.8(d) to read as follows, or to like effect: "The stormwater discharged (either by itself or in combination with the same, similar or other contaminants, or water), after reasonable mixing, does not give rise to all or any of the following effects in the receiving water: ..."	<ul style="list-style-type: none"> • Support inclusion of 12.B.1.8(a)(i) as gives effect to RMA section 30(1)(c) (iii) and (iii) functions. • 12.B.1.8(d) does not give effect to RMA section 107.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 62</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 62</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 62</i>		• <i>No reason given.</i>
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 62</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Hawkdun Station</i>	1053	<i>Oppose submission 306 ref. 62</i>		
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 306 ref. 62</i>		• <i>Difficulty to manage, monitor and enforce.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306</i>		• <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>ref. 62</i> <i>Oppose submission 306 ref. 62</i>		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.

63 Rule 12.B.1.9 / 12.4.1.2 - Stormwater road discharge permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
P R Lyders Trust	28	Not Applicable	Ensure road runoff does not cause erosion, pollution, sediment into water-ways.	<ul style="list-style-type: none"> • Erosion from road runoff on property. • ORC should divert runoff to where erosion doesn't occur.
Hawkdun Idaburn Irrigation Company Ltd	70	Not Applicable	Needs to include storm flow from irrigation systems.	<ul style="list-style-type: none"> • Should be permitted into natural watercourses.
NZ Transport Agency	203	Not Applicable	Retain Rule 12.B.1.9.	<ul style="list-style-type: none"> • Retaining provides for on-going operation and maintenance of resources such as roads.
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 203 ref. 63</i>		<ul style="list-style-type: none"> • No reasons given.
Dunedin City Council	211	Not Applicable	Retain.	<ul style="list-style-type: none"> • Contributes to ongoing operation and maintenance of existing resources. • Concerns that rule may be reviewed in future to link to new policies in Chapter 7, Schedules 15 and 16.
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 211 ref. 63</i>		<ul style="list-style-type: none"> • No reason given.

65 Rule 12.B.3.1 / 12.4.2.1 - Stormwater 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	Not Applicable	Needs to include storm flow from irrigation systems.	<ul style="list-style-type: none"> • Should be permitted into natural watercourses.
NZ Transport Agency	203	Not Applicable	Retain Rule 12.B.3.1.	<ul style="list-style-type: none"> • Provides certainty. • Clarifies status of non-permitted stormwater discharge as a restricted discretionary activity.
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 203 ref. 65</i>		<ul style="list-style-type: none"> • No reasons given.
Dunedin City Council	211	Not Applicable	Retain.	<ul style="list-style-type: none"> • Provides certainty to plan users.
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 211 ref. 65</i>		<ul style="list-style-type: none"> • No reason given.
Vivienne & Greg Kerr	213	Not Applicable	Support addition of (b).	<ul style="list-style-type: none"> • No reason given.
Forest and Bird	271	Not Applicable	Retain 12.B.3.1 as publicly notified. Delete (c).	<ul style="list-style-type: none"> • Supports regard being given to any effect on RSWs or regionally significant wetland value. • (c) suggests its may be OK to adversely affect a RSW provided there is a financial contribution.
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose</i>		<ul style="list-style-type: none"> • Not all waterways need to be enhanced.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 271 ref. 65</i>		
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 65</i>		<ul style="list-style-type: none"> • <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>
The Director-General of Conservation	306	Not Applicable	Retain 12.B.3.1 as publicly notified.	<ul style="list-style-type: none"> • Support regard being given to any effect on any RSW or any RSW value.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 65</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 65</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 65</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 65</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Hawkdun Station</i>	1053			
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 65</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 65</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>

67 Rule 12.B.4.1 - New discretionary trade discharge

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
NZ Transport Agency	203	Support	Retain Rule 12.B.4.1	<ul style="list-style-type: none"> • Provides certainty. • Clarifies status of non-permitted stormwater discharge as a restricted discretionary activity.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 67</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
Dunedin City Council	211	Support	That Rules in Chapter 12.B.4 be retained.	<ul style="list-style-type: none"> • Rule provides certainty.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 67</i>		<ul style="list-style-type: none"> • Clarifies status of discharge that does not meet permitted rules. • <i>No reason given.</i>
Silver Fern Farms Limited	238	Did not specify	Clarification that Silver Fern Farms waste water discharge, being a discharge of contaminants from an industrial or trade premises, is a discretionary activity pursuant to Rule 12.B.4.1.	<ul style="list-style-type: none"> • Distinguish between industrial and farming discharges. • Does not want to fall under 12.C prohibitions.
The Director-General of Conservation	306	Support	Retain as notified.	<ul style="list-style-type: none"> • Discretionary activity status allows thorough assessment.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 67</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 67</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 67</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 67</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	1049	<i>Oppose submission 306 ref. 67</i>		<ul style="list-style-type: none"> • <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 & 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>Clutha District Council</i>	1050			
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 67</i>		
<i>Hawkdun Station</i>	1053			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 67		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
Glenshee Station Limited	1062	Oppose submission 306 ref. 67		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 67		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.

68 Rule 12.B.4.2 - New discretionary other discharge

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Dairy Holdings Limited	195	Amend	That the rule be amended to be restricted discretionary with the elements of discretion being formed around the items listed in Rule 12.B.4.1.	<ul style="list-style-type: none"> • Going from permitted to discretionary unnecessarily onerous, restricted discretionary or controlled appropriate.
Waitaki Irrigators Collective Limited	1031	Support submission 195 ref. 68		<ul style="list-style-type: none"> • Submission outlines concern of further submitter.
Glenshee Station Limited	1062	Support in part submission 195 ref. 68		<ul style="list-style-type: none"> • Support in part, particularly regarding wider effect of the plan change. • 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.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 195 ref. 68		<ul style="list-style-type: none"> • Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.
NZ Transport Agency	203	Support	Retain Rule 12.B.4.2.	<ul style="list-style-type: none"> • Provides certainty. • Clarifies status of non-permitted stormwater discharge as a restricted discretionary activity.
Dunedin City Council	1025	Support submission 203 ref. 68		<ul style="list-style-type: none"> • No reasons given.
Dunedin City Council	211	Support	That Rules in Chapter 12.B.4 be retained.	<ul style="list-style-type: none"> • Rule provides certainty. • Clarifies status of discharge that does not meet permitted rules.
Strath Taieri Community Board	1029	Support submission 211 ref. 68		<ul style="list-style-type: none"> • No reason given.
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Opposes Rule 12.B.4.2 and seeks restricted discretionary activity status for the application of agrichemicals and fertiliser to production land, with ORC restricting its discretion to the matter included in the condition that cannot be met.	<ul style="list-style-type: none"> • Questions why it should be discretionary considering stormwater discharges not meeting conditions is restricted discretionary.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
Ballance Agri-Nutrients Ltd	262			
Horticulture New Zealand	1032	Support in part		<ul style="list-style-type: none"> • For the reasons given by the submitter.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 248 ref. 68</i>		
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submissions 248, 252 & 262 ref. 68</i>		<ul style="list-style-type: none"> • <i>Rules need to be clear and unambiguous.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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>			
The Director-General of Conservation	306	Support	Retain as notified.	<ul style="list-style-type: none"> • Discretionary activity status allows thorough assessment.
<i>Craiglea Limited</i>	<i>1012</i>	<i>Oppose submission 306 ref. 68</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Contact Energy Limited</i>	<i>1013</i>	<i>Support submission 306 ref. 68</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Hopefield Investments Ltd</i>	<i>1019</i>	<i>Oppose submission 306 ref. 68</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Oppose submission 306 ref. 68</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 68</i>		<ul style="list-style-type: none"> • <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & 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 & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 68		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
<i>Central Otago Wine Growers Association</i>	1054	Oppose submission 306 ref. 68		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
<i>Glenshee Station Limited</i>	1062	Oppose submission 306 ref. 68		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
<i>Greenfield Rural Opportunities Limited</i>	1077	Oppose submission 306 ref. 68		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.

91 Section 12.C - Other discharges

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
University of Otago, Department of Zoology	57	Amend	Specifically include non-point source discharges in the wording.	<ul style="list-style-type: none"> • Current wording potentially interpreted as only point source.
<i>Federated Farmers of New Zealand</i>	1057	Oppose submission 57 ref. 91		<ul style="list-style-type: none"> • Difficult to quantify and apportion responsibility. • Lack of scientific basis makes inclusion unworkable and impractical. • All sources covered in limits.
Belmont	129	Amend	The person applying the water is totally responsible for keeping it on their property. Must contain their water or controls are needed.	<ul style="list-style-type: none"> • No runoff means no problems irrespective of water quality. • Neighbouring runoff from steep intensively farmed irrigated land has artificially created waterways which now have to be fenced and stock managed. • Own effect on waterways minor and having to fence because of neighbours poor water management is unfair.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Australian example shows unmaintained fencing adds to flooding problem (growth of gorse/weeds).
Ernslaw One Ltd	149	Amend	<p>Have other proposed rules informed by the inherent variability in sediment yield from tussock, undisturbed native bush and harvested plantation forests.</p> <p>Insert a controlled activity standard for activities that are non-compliant.</p>	<ul style="list-style-type: none"> • Positive effects of forestry on sediment control and influence of natural sediment yield. • Insufficient consideration given to the impacts on forestry sector. • Fails to provide a default standard in event of non-compliance. • Need to provide clarity and certainty.
<i>Alliance Group Limited</i>	1060	<i>Support submission 149 ref. 91</i>		<ul style="list-style-type: none"> • <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>
Alliance Group Limited	187	Amend	Amend the rest of the proposed Section 12.C rules so that they are measurable and practical to assess and regulate.	<ul style="list-style-type: none"> • Schedule 16 limits exceptionally low, unnecessary where assimilative capacity of receiving water sufficient to avoid adverse environmental effects beyond a mixing zone. • The level of information needed to assess compliance with the rule is overly arduous. • Ultra vires on grounds of uncertainty. • Sustainable management outcome not provided for - human use (social and economic) values, existing environment (including variability and human use influences), assimilative capacity. • Difficult to enforce.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 187 ref. 91</i>		<ul style="list-style-type: none"> • <i>Section 12C should be amended because currently impractical.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 187 ref. 91</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 187 ref. 91</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Mr RJ Borst</i>	1034	<i>Support submission 187 ref. 91</i>		<ul style="list-style-type: none"> • <i>Rules need to be certain.</i> • <i>Schedule 16 limits should apply following consideration of assimilative capacity of receiving water.</i> • <i>Current draft difficult to enforce.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>City Forests</i>	1071	<i>Support submission 187 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
Dairy Holdings Limited	195	Amend	No decision requested.	<ul style="list-style-type: none"> • Rule package is uncertain - gives ORC inappropriate level of discretion over compliance.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 195 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 195 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 91</i>		<ul style="list-style-type: none"> • Submission outlines concern of further submitter.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 91</i>		<ul style="list-style-type: none"> • Support in part, particularly regarding wider effect of the plan change. • 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>City Forests</i>	1071	<i>Support submission 195 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 91</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to have an adverse effect on the environment.
NZ Transport Agency	203	Amend	<p>Amend rules [which refer to Schedule 16] to make clear that compliance with Schedule 16 limits is only required by the dates in Schedule 16.</p> <p>Resolve ambiguity between Rules 12.C.0.2 and 12.C.1.1, or delete Rule 12.C.0.2.</p> <p>Amend Rules 12.C.1.2, 12.C.1.5 and 12.C.2.1 where they refer to the limits given in Schedule 16 to refer to the limits as median values.</p>	<ul style="list-style-type: none"> • Schedule 16 has different compliance timeframes for different catchments. • No linkage in rules. Could be misinterpreted as limits need complying with from date of notification. • If this is ORC's intent, it is opposed. • Inconsistent with Chapter 7 policies. • How is it possible to discharge sediment in terms of 12.C.1.1 and have no reduction in visual clarity as required by 12.C.0.2? • All discharges will be prohibited, irrespective of 12.C.1.1. • If ambiguity cannot be resolved, Rule 12.C.0.2 is opposed. • Schedule 16 limits are not to be exceeded. Limits should be median values.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 203 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 203 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 91</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 203 ref. 91</i>		<ul style="list-style-type: none"> • Need to remove ambiguity and uncertainty around timeframe, limits and which rules are subordinate.
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 91</i>		<ul style="list-style-type: none"> • 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.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>City Forests</i>	1071	<i>Support submission 203 ref. 91</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Trustpower Limited	206	Amend	<p>Identified four main areas which require clarification/amendments in relation to the rules. Seek:</p> <ul style="list-style-type: none"> - Clarity in the Plan Change that Section 12.C applies to renewable electricity generation activities; - Clarity with regards to how the prohibited, restricted discretionary and permitted activity rules are intended to work together; - Clarity with regards to how the various permitted activity rules are intended to work together; and - Removal of impractical prohibited activity standards as a first priority, or re-working the standards by lowering the activity statuses and amending their content so that they are measurable and practical as a second priority. 	<ul style="list-style-type: none"> • Provides clarity to plan users and avoids confusion. • Permitted activities may also be prohibited. • Activity may be permitted and restricted discretionary. • Prohibited activity rules inappropriate.
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 91</i>		<ul style="list-style-type: none"> • <i>It should be clear which set of rule applies to renewable electricity generation activities.</i> • <i>Supports the alternative position requested by Trustpower, should Contact's primary submission not be accepted.</i> • <i>Reasons stated in Trustpower's submission.</i>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 206 ref. 91</i>		<ul style="list-style-type: none"> • <i>Section 12C should be amended.</i> • <i>Rule structure should be clarified.</i> • <i>Inappropriate prohibited activity standards should be removed.</i>
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 91</i>		<ul style="list-style-type: none"> • <i>Rules should be amended to provide clarity to plan users.</i> • <i>Prohibited activity status should be deleted, as not appropriate for renewable electricity generation activities.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 206 ref. 91</i>		<ul style="list-style-type: none"> • <i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i>
Blakely Pacific Limited	209	Amend	Have other proposed rules informed by the inherent variability in sediment yield from tussock, undisturbed native bush and harvested plantation forests.	<ul style="list-style-type: none"> • Positive effects of forestry on sediment control and influence of natural sediment yield.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 91</i>		<ul style="list-style-type: none"> • <i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i>
Dunedin City Council	211	Amend	<p>That rules in Amended Chapter 12.C of Plan Change 6A are amended to give effect to Policy 7.D.3.</p> <p>That a 'catch-all' discretionary rule is added to section 12.C to allow discharges to water to obtain consent.</p>	<ul style="list-style-type: none"> • No rule that provides for policy. • No rule that provides for consenting of discharges to land under policy. • Current information from ORC shows Schedule 16 not achievable, so all discharges become prohibited. • Oppose as will have significant social, economic and cultural effects. • Allowing discretionary activity rule will still allow objectives and policies to be met. • Precedent set by these rules is concerning for future plan changes.
<i>Contact Energy Limited</i>	1013	<i>Support submission 211 ref. 91</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 91</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Clutha District Council</i>	1050	<i>Support</i>		<ul style="list-style-type: none"> • <i>Agree with submissions in relation to discharge rules and prohibited discharges.</i>
<i>Central Otago District Council</i>	1051	<i>submission 211</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>ref. 91</i>		<ul style="list-style-type: none"> • Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 91</i>		<ul style="list-style-type: none"> • Rules too vague, unreasonable and impractical; creates uncertainty. • Schedule 16 not achievable.
<i>Alliance Group Limited</i>	1060	<i>Support submission 211 ref. 91</i>		<ul style="list-style-type: none"> • 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</i>	1074	<i>Support in part submission 211 ref. 91</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects.
Jeremy Bisson	223	Oppose	No decision requested.	<ul style="list-style-type: none"> • Proposed rules represent a comprehensive reduction of existing controls.
Meridian Energy Limited	251	Amend	Undertake a robust section 32 analysis, including scientific and economic assessments, of the proposed permitted activity rules and subsequently amend them so that they are measurable and enforceable.	<ul style="list-style-type: none"> • 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.
<i>Contact Energy Limited</i>	1013	<i>Support submission 251 ref. 91</i>		<ul style="list-style-type: none"> • Reasons stated in the submission.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 251 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 251 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 251 ref. 91</i>		<ul style="list-style-type: none"> • For the reasons given by the submitter.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 251 ref. 91</i>		<ul style="list-style-type: none"> • Lack of certainty, clarity and scientific justification around limits and rules; makes plan difficult to use, monitor and enforce.
<i>Alliance Group Limited</i>	1060	<i>Support submission 251 ref. 91</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Support submission 251 ref. 91</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
John Lee & Dennis Pezaro	254	Did not specify	Concern that generalised rules, often of necessity reduced to common denominators, do not protect uncommon or unique values in particular waterways.	<ul style="list-style-type: none"> • Accepted that some common rules needed for aspects of water quality. • Soil type, bank stability, grazing practice result in different problems. • Inappropriate to treat identically.
North Otago Irrigation Company	260	Amend	That the wording of the rules is amended to provide further protection to farmers regarding the source of contaminants, e.g. '... the presence of contaminants does not result from the activities of the property owner'.	<ul style="list-style-type: none"> • Farmers should only be responsible for their direct contribution of contaminants - e.g. not those from natural inputs - this was clear in consultation, but is inadequately covered in the rules.
<i>John Webster</i>	1063	<i>Support submission 260 ref. 91</i>		<ul style="list-style-type: none"> • Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.
<i>Peter Mitchell</i>	1064	<i>Support submission 260 ref. 91</i>		<ul style="list-style-type: none"> • Support the NOIC submission in full.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
4650 Matarae Station Ltd	264	Amend	Changes to the whole of rule 12.C	<ul style="list-style-type: none"> Impossible to pin contamination on one person when it's cumulative effects caused by numerous landholders.
Colin Scurr	268	Oppose	No decision requested.	<ul style="list-style-type: none"> Rules present challenges for compliance. Inability to know whether farmers are complying with the rules. High level of uncertainty is untenable and not consistent with RMA. Uncertain rules are unlawful.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 91</i>		<ul style="list-style-type: none"> <i>Science doesn't justify stringent measures.</i>
Fish and Game (Otago)	287	Amend	If necessary, amend the rules [in 12C] on the basis of technical advice, to ensure workability and enforceability.	<ul style="list-style-type: none"> 12C rules conditionally supported provided they are enforceable, and technically practicable. Concerned about how a single noncompliant discharge is determined where other noncompliant discharges occur. If action taken against a group of dischargers then that may resolve this.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 287 ref. 91</i>		<ul style="list-style-type: none"> <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>Rayonier New Zealand Limited</i>	1015	<i>Support submission 287 ref. 91</i>		<ul style="list-style-type: none"> <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 287 ref. 91</i>		<ul style="list-style-type: none"> <i>Consistent with Ernslaw One's submission.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 287 ref. 91</i>		<ul style="list-style-type: none"> <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 in part submission 287 ref. 91</i>		<ul style="list-style-type: none"> <i>Rules need to be achievable and appropriate to met objectives.</i>
<i>City Forests</i>	1071	<i>Support</i>		<ul style="list-style-type: none"> <i>Consistent with City Forest's submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 287 ref. 91</i>		
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 91</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Paterson Pitts Partners Ltd	288	Amend	The rules need to be amended so that the consent process is available.	<ul style="list-style-type: none"> • Prohibiting is extreme; mitigation cannot achieve a consent; conflicts with RMA.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 288 ref. 91</i>		<ul style="list-style-type: none"> • <i>Rules need to be achievable and appropriate to met objectives.</i>
Otago Water Resource User Group (OWRUG)	292	Amend	<p>Permit water with contaminants or sediment entering a water race or irrigation dam that eventually discharge into a natural water body, provided the discharge into the natural water body does not breach the required contaminant and sediment levels.</p> <p>Amend the reference to receiving "water" so that it excludes water within a water race or irrigation dam when that irrigation water does not re-enter a natural water body.</p>	<ul style="list-style-type: none"> • More efficient to treat water at the final discharge point. • No adverse environmental effect from activity.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support in part submission 292 ref. 91</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support in part submission 292 ref. 91</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Ernslaw One's submission.</i>
<i>Mr RJ Borst</i>	1034	<i>Support submission 292 ref. 91</i>		<ul style="list-style-type: none"> • <i>Support for reasons stated in original 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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>City Forests</i>	1071	<i>Support in part submission 292 ref. 91</i>		<ul style="list-style-type: none"> • <i>Partly consistent with City Forest's submission.</i>

92 12C Note box - How the rules apply

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Matuanui Ltd	163	Support	Retain note box.	<ul style="list-style-type: none"> • Agree reclamation and deposition associated with in-stream works should be addressed in Chapter 13, reduces consenting costs, red tape.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 163 ref. 92</i>		<ul style="list-style-type: none"> • Rule too vague, unworkable and impractical creating uncertainty.
Trustpower Limited	206	Amend	Amend the note as follows: "Note: 1. Section 12.C applies to any discharge not specifically provided for in Sections 12.A or 12.B including from renewable electricity generation activities. 2. Under the Regional Plan: Water, 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"> • Certainty for which rules apply to renewable electricity generation activities.
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 92</i>		<ul style="list-style-type: none"> • Supports the alternative position requested by Meridian, should Contact's primary submission not be accepted. • Would make the position clearer.
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 92</i>		<ul style="list-style-type: none"> • Note box should be amended. • Provides certainty as to which rules apply to renewable electricity generation activities.
Silver Fern Farms Limited	238	Amend	Would like a determination that the discharge from Silver Fern Farms Finegand would not be classified under the prohibited activity status.	<ul style="list-style-type: none"> • Considers 12.B matters already covered in this plan change, with mixing zones removed and prohibitions. • Our consented discharge would become prohibited.
Contact Energy Limited	284	Amend	Note 2 should refer to all activities falling within section 13.5, not just to reclamation and deposition of cleanfill.	<ul style="list-style-type: none"> • No reason given.

93 Rule 12.C.0.1 - Discharge prohibited

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Tami and Jason Sargeant	24	Support	Prohibit discharges that have an obvious effect in receiving water bodies.	<ul style="list-style-type: none"> • Protect waterways for recreational purposes.
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 24 ref. 93</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
The Cow Farm Limited	133	Amend	Amend the rule to remove the prohibited status and allow activities whose effects are no more than minor to obtain consent.	<ul style="list-style-type: none"> • Significantly higher threshold than the RMA, prohibits activities with less than minor effects. • Cannot apply for consent for such an activity, breaches conditions of natural justice. • Contrary to purposes and principles of RMA.
<i>Waitaki District Council</i>	1003	<i>Support submission 133 ref. 93</i>		<ul style="list-style-type: none"> • Rule overly stringent.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 93</i>		<ul style="list-style-type: none"> • Inconsistent with RMA. • Doesn't allow for situations where despite best practice provisions can't be met, even if effects on water quality after reasonable mixing are minor.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa</i>	1065	<i>Support in part submission 133</i>		<ul style="list-style-type: none"> • Support an activity status that reflects the potential effects of land use on water quality, subject to appropriate policy guidance and public notification.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Runaka Puketeraki, Hokonui Runanga</i>		<i>ref. 93</i>		
Waitaki District Council	138	Oppose	Delete or revise.	<ul style="list-style-type: none"> Overly stringent. "Odour" in this prohibited activity is not defined.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 138 ref. 93</i>		<ul style="list-style-type: none"> Agrees rule should be deleted or revised. Prohibited activity controls overly restrictive: prohibit discharges with minor effects on water quality. Opposes rules inconsistent with RMA.
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 93</i>		<ul style="list-style-type: none"> Consistent with DCC position. Concern about economic and social impact. Control measures of PC6A go far beyond those required to achieve the stated environmental results.
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 138 ref. 93</i>		<ul style="list-style-type: none"> Supports the intent of the proposed rule, no changes are needed.
<i>TrustPower</i>	1059	<i>Support submission 138 ref. 93</i>		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 93</i>		<ul style="list-style-type: none"> Areas of concern or support are consistent with those expressed by the NZTA. Control measures proposed in plan change go beyond those required to achieve the stated environmental results. Seek the submission is allowed.
Clutha Agricultural Development Board	139	Amend	Term "floatable material" needs clarification or definition.	<ul style="list-style-type: none"> Not clear whether "floatable material" includes leaves and twigs.
Peter McNab	192	Support	Totally support.	<ul style="list-style-type: none"> No reason given.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 192 ref. 93</i>		<ul style="list-style-type: none"> Submitter supports rule.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	Redraft as follows: Any discharge of contaminants to freshwater, or onto land where it may enter freshwater, where the discharge: <ul style="list-style-type: none"> (i) Has an odour; or (ii) Contains an oil or grease film, scum or foam, or floatable material, . . . 	<ul style="list-style-type: none"> Minor redrafting for clarity. (Note incorrect reference to Policy 7.B.5 in submission).
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose submission 197 ref. 93</i>		<ul style="list-style-type: none"> This rule addresses non-point source discharges. Point-source discharges are addressed elsewhere. Reference to "freshwater" is opposed as the proposed plan change should protect public water bodies only.
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 93</i>		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 197 ref. 93</i>		<ul style="list-style-type: none"> 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>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 93</i>		<ul style="list-style-type: none"> 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. 93</i>		<ul style="list-style-type: none"> Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
NZ Transport Agency	203	Amend	Rewrite the rules to include subordination to the permitted and	<ul style="list-style-type: none"> Precedence of prohibited activity rules over other rules

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			discretionary rules. It is requested that Rules 12.C.0.1, 12.C.0.2 and 12.C.0.4 are deleted or revised given that the rules are overly stringent.	<ul style="list-style-type: none"> Discharges are prohibited regardless of permitted and discretionary rules. Prohibited activity rules set no minimum limits, some discharges with de minimis effects will be prohibited.
Waitaki District Council	1003	Support in part submission 203 ref. 93		<ul style="list-style-type: none"> Rule overly stringent.
Waitaki District Council	1003	Support submission 203 ref. 93		<ul style="list-style-type: none"> Discharges prohibited, inconsistency.
Contact Energy Limited	1013	Support submission 203 ref. 93		<ul style="list-style-type: none"> Reasons stated in the submission.
Dunedin City Council	1025	Support submission 203 ref. 93		<ul style="list-style-type: none"> No reasons given.
Federated Farmers of New Zealand	1057	Support submission 203 ref. 93		<ul style="list-style-type: none"> Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. Prohibited status too high. Uncertainty around expectations, rule unworkable.
TrustPower	1059	Support submission 203 ref. 93		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 203 ref. 93		<ul style="list-style-type: none"> 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.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Oppose in part submission 203 ref. 93		<ul style="list-style-type: none"> Support an activity status that reflects the potential effects of land use on water quality.
Dunedin City Council	211	Amend	The Rule is deleted or revised.	<ul style="list-style-type: none"> Overly stringent. No discharge limits set so any discharge that gives rise to stated effects will be prohibited. Some discharges will have de minimis effects but prohibited. Conflict with permitted activities.
Waitaki District Council	1003	Support in part submission 211 ref. 93		<ul style="list-style-type: none"> Rule overly stringent.
Waitaki District Council	1003	Support submission 211 ref. 93		<ul style="list-style-type: none"> Overly stringent: activities with de minimis effects prohibited. Inconsistent with 12.C.1.1.
Strath Taieri Community Board	1029	Support submission 211 ref. 93		<ul style="list-style-type: none"> No reason given.
Clutha District Council	1050	Support submission 211 ref. 93		<ul style="list-style-type: none"> Agree with submissions in relation to discharge rules and prohibited discharges. Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
Central Otago District Council	1051	Support submission 211 ref. 93		<ul style="list-style-type: none"> Agree with submissions in relation to discharge rules and prohibited discharges. Prohibitions are overly restrictive and have unintended application due to

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				<i>Schedule 16 limits.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 93</i>		<ul style="list-style-type: none"> • <i>Agree with submissions in relation to discharge rules and prohibited discharges.</i> • <i>Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 93</i>		<ul style="list-style-type: none"> • <i>Rules inconsistent with RMA.</i> • <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i>
<i>TrustPower</i>	1059	<i>Support submission 211 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 93</i>		<ul style="list-style-type: none"> • <i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i>
Fulton Hogan Limited	222	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	<ul style="list-style-type: none"> • <i>Criteria for meeting or not meeting must be absolutely clear.</i> • <i>Prohibiting activities that pose limited environment risk doesn't align with RMA.</i> • <i>Grouping prohibitions under 'other discharges' means that all discharges that don't fit under Rules 12.A or 12.B are caught.</i> • <i>Doesn't give effect to RPS and RMA, by recognising mixing zones.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 222 ref. 93</i>		<ul style="list-style-type: none"> • <i>Rule not practical and vague regarding appropriate mitigation.</i> • <i>Sediment runoff can occur regardless of land use.</i>
<i>TrustPower</i>	1059	<i>Support submission 222 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 222 ref. 93</i>		<ul style="list-style-type: none"> • <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>
Holcim (New Zealand) Limited	224	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	<ul style="list-style-type: none"> • <i>Criteria for meeting or not meeting must be absolutely clear.</i> • <i>Prohibiting activities that pose limited environment risk doesn't align with RMA.</i> • <i>Grouping prohibitions under 'other discharges' means that all discharges that don't fit under Rules 12.A or 12.B are caught.</i> • <i>Doesn't give effect to RPS and RMA, by recognising mixing zones.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 224 ref. 93</i>		<ul style="list-style-type: none"> • <i>Rule not practical and vague regarding appropriate mitigation.</i> • <i>Sediment runoff can occur regardless of land use.</i>
<i>TrustPower</i>	1059	<i>Support submission 224 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 224 ref. 93</i>		<ul style="list-style-type: none"> • <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>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support submission 224 ref. 93</i>		<ul style="list-style-type: none"> • <i>Inappropriate use of prohibited activity status unnecessarily constraining appropriate activities.</i>
Kawarau Station Limited	232	Oppose	Delete rule.	<ul style="list-style-type: none"> • <i>Unable to prevent all runoff (particularly stock waste) in storm event.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 232 ref. 93</i>		<ul style="list-style-type: none"> • <i>Will be circumstances beyond farmers control.</i> • <i>Rule uncertain regarding what can be done to minimise runoff.</i>

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Fonterra Co-operative Group Limited	241	Oppose	Withdraw the rule.	<ul style="list-style-type: none"> No analysis showing prohibitions most appropriate options Vulnerable to legal challenge. Many terms not defined. If interpreted literally would include trivial discharges. Need to define exactly so stakeholders now what to avoid. Not appropriate to leave discretion with consent authority. Rules have effect so persons vulnerable to legal action. Need to provide stakeholders certainty. Environment Court stated criteria be "clearly specified and capable of objective attainment"
Forest and Bird NZ	1007	Oppose submission 241 ref. 93		<ul style="list-style-type: none"> Rule is needed to maintain and enhance water quality and is capable of objective measurement.
The Director-General of Conservation	1011	Oppose submission 241 ref. 93		<ul style="list-style-type: none"> Rule with amendments sought by D-G gives effect to RMA s107.
Meridian Energy Limited	1014	Support submission 241 ref. 93		<ul style="list-style-type: none"> Agrees rule should be withdrawn. Prohibited activity controls overly restrictive and are not based on the best available information and scientific and socio-economic knowledge. Opposes rules inconsistent with the NPSFW and RMA.
Environmental Defence Society	1055	Oppose submission 241 ref. 93		<ul style="list-style-type: none"> Rule is needed to maintain and enhance water quality.
Federated Farmers of New Zealand	1057	Support submission 241 ref. 93		<ul style="list-style-type: none"> Rule too vague, unworkable and impractical. Sediment runoff can occur regardless of land use.
TrustPower	1059	Support submission 241 ref. 93		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 241 ref. 93		<ul style="list-style-type: none"> 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.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 241 ref. 93		<ul style="list-style-type: none"> Consistent with relief sought by further submitter.
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Opposes the prohibited activity status included in Rule 12.C.0.1 and seeks the provision of these activities to be addressed in any discretionary activity rule.	<ul style="list-style-type: none"> Prohibitions need to give certainty. Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. Minor discharges with minor effects are prohibited. S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. Difficult to determine what other activities are potentially caught in definition even if accidental.
New Zealand Fertiliser Manufacturers Research Association Inc	252			
Federated Farmers of New Zealand	1057	Support submissions 248 and 252 ref. 93		<ul style="list-style-type: none"> Rules uncertain and confusing. Limits not realistic or achievable. Science doesn't justify stringent measures. Lack of fairness as to differing catchment and farm types. Could make farming economically unviable.
TrustPower	1059	Support submissions 248		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>and 252 ref. 93</i>		
<i>Alliance Group Limited</i>	1060	<i>Support submissions 248 and 252 ref. 93</i>		<ul style="list-style-type: none"> • 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.
Queenstown Lakes District Council	255	Amend	Amend the prohibited activity rules to include minimum discharge limits.	<ul style="list-style-type: none"> • Inappropriate to apply to district's urban areas. • Support approach that discharges that do not comply with Schedule 16 are prohibited. • Having no minimum discharge limits overly restrictive, unworkable when dealing with measurable effects which are minimal.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Rule overly stringent.
<i>Dunedin City Council</i>	1025	<i>Support submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Prohibitions do not set minimum discharge limits, which is overly restrictive.
<i>Clutha District Council</i>	1050	<i>Support in part submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
<i>Central Otago District Council</i>	1051	<i>Support in part submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
<i>Central Otago Wine Growers Association</i>	1054	<i>Support in part submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Limits unrealistic. Having no minimum discharge limits is overly restrictive.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Recognition Schedules 15 and 16 don't accurately reflects variations between water bodies. • Agreed that allowance for appropriate mixing zones should be included. • Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects. • Seeks the submission be allowed and the plan change be amended as per the submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 255 ref. 93</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects. • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Ballance Agri-Nutrients Ltd	262	Amend	Opposes the prohibited activity status included in Rule 12.C.0.1 and seeks the provision of these activities as discretionary activities.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • Difficult to determine what other activities are potentially caught in this definition even if accidental. • S 32 Report inadequately assesses the use of prohibited activity status. S 32

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				report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 262 ref. 93</i>		• <i>Rules uncertain and confusing.</i> • <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i> • <i>Lack of fairness as to differing catchment and farm types.</i>
<i>TrustPower</i>	1059	<i>Support submission 262 ref. 93</i>		• <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 93</i>		• <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>
Colin Scurr	268	Amend	Delete rule or amend rule to provide for reasonable mixing, include qualifiers as to the level of contamination and replace prohibited activity status with discretionary status.	• Prohibited status removes all ability for consent to be granted. • Prohibited status is not justified by any analysis of actual or potential effects. • Does not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Does not provide for reasonable mixing or assimilation with the receiving environment. • Inconsistent with RMA (particularly Sections 69, 70 and 107), RPS and NPSFW. • Objectives and Policies do not provide support for prohibited status.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 268 ref. 93</i>		• <i>Rule overly stringent.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 93</i>		• <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i> • <i>Discretionary status appropriate.</i>
Forest and Bird	271	Amend	Add: "(iii) is likely to have a significant adverse effects on aquatic life; is a prohibited activity."	• Does not give full effect to RMA S107.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 93</i>		• <i>Not all waterways need to be enhanced.</i> • <i>Background data required before any agricultural activities are restricted.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 93</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries</i>	1049			

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<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 271 ref. 93</i>		<ul style="list-style-type: none"> • <i>Uncertainty around term 'likely to have', too subjective.</i> • <i>Potential to have an adverse effect doesn't justify prohibited status, inconsistent with RMA balancing.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 271 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 93</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 93</i>		<ul style="list-style-type: none"> • <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 93</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Federated Farmers of New Zealand	278	Amend	<p>Delete prohibited activity in Rule 12.C.0.1.</p> <p>Replace prohibited with non-complying.</p> <p>Adopt rule as non-complying with the following amendments: Reword rule in accordance with section 107 and provide for reasonable mixing.</p>	<ul style="list-style-type: none"> • Prohibits discharges that have any measurable effect on the receiving water at the point of discharge. • Doesn't allow for situations where even with best practice the provisions can't be met, but the effects on water quality after reasonable mixing will be minor. • Non-complying status is a better solution. • Contrary to RPS policy 6.5.5(c). • Allows for reasonable mixing as per RMA.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 93</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited status provides clarity and is essential to maintaining and improving water quality.</i> • <i>Mixing zones should not be provided for.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 93</i>		<ul style="list-style-type: none"> • <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. 93</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 278 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited activity status is essential for certain discharges to maintain and improve water quality.</i>
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 278 ref. 93</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278</i>		<ul style="list-style-type: none"> • <i>Although it doesn't request total plan change withdrawal it recognises Glenshee's concerns, namely there has been little/no analysis/discussion of</i>

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		<i>ref. 93</i>		<i>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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 278 ref. 93</i>		• <i>Support an activity status that reflects the potential effects of land use activities on water quality, subject to appropriate policy guidance and public notification.</i>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Oppose in part submission 278 ref. 93</i>		• <i>Oppose use of non-complying status. Inappropriate use of prohibited activity status unnecessarily constraining appropriate activities.</i> • <i>Support removal of prohibited status.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 93</i>		• <i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i> • <i>Activities should only be prohibited when they have significant adverse environmental effects.</i>
Contact Energy Limited	284	Amend	Rule 12.C.0.1 should refer to discharges which are "about to enter a fresh water body for the first time".	• Reference to discharges "to water" raise question re consideration of width of definition of 'water'. • Need to account for situation of water being taken and then discharged again. • Rule 12.C.1.6 does not cover situation fully.
Clydevale Dairy Farms Ltd	297	Amend	Delete the Rule or amend it to discretionary activity status that includes the qualifiers as to the level of contamination and which provides for reasonable mixing.	• Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report. • Not justified by any analysis of actual or potential effects. • No qualifier that discharge has to be offensive, objectionable or conspicuous. • Applying prior to discharge point removes provision for mixing. • Inconsistent with RMA, NPS and RPS. • Rule does not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work, so inconsistent with S107 of RMA.
Greenfield Farming Ltd	298			
Big River Dairy Limited	299			
<i>Waitaki District Council</i>	1003	<i>Support in part submissions 297 - 299 ref. 93</i>		• <i>Rule overly stringent.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submissions 297 - 299 ref. 93</i>		• <i>Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</i>
The Director-General of Conservation	306	Amend	That 12.C.0.1 be amended as follows, or to like effect: "Any discharge of contaminants, where the discharge is about to enter water, that: (i) Has an odour; or (ii) Contains an oil or grease film, scum or foam, or floatable material, (iii) Is likely to have a significant adverse effects on aquatic life: is a prohibited activity."	• This provision and others under 12.C.0 do not give full effect to RMA S 107. • Odourless/colourless toxins would not be caught.
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 93</i>		• <i>Provisions should reflect the actual wording in Section 107 of the Act, not the selective interpretation put forward by submitter.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 93</i>		• <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
Contact Energy Limited	1013	<i>Oppose submission 306</i>		• <i>The submission fails to give full effect to section 107.</i> • <i>If there is a need to catch odourless and colourless toxins, that should be</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 93</i>		<i>addressed more directly.</i>
<i>Hopefield Investments Ltd</i>	<i>1019</i>	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <i>Threshold of "is likely to have" not sufficient for a prohibited rule.</i>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <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>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> • <i>Proposed changes would require an enormous number of staff to monitor.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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. 93</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Central Otago District Council</i>	<i>1051</i>			
<i>Moutere Station Limited</i>	<i>1052</i>	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <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>Various discharges are required and encouraged under today's farming</i>
<i>Hawkdun Station</i>	<i>1053</i>			
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <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>Various discharges are required and encouraged under today's farming</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>practices: no need to restrict these discharges in the manner sought by the submitter.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <i>Proposed changes would require an enormous number of staff to monitor.</i> • <i>Addressed elsewhere.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 93</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>
Clutha District Council	308	Amend	Delete rule or amend rule to provide for reasonable mixing, include qualifiers as to the level of contamination and replace prohibited activity status with discretionary status.	<ul style="list-style-type: none"> • Removal of offensive, objectionable or conspicuous broadens applicability, inconsistent with wording of RMA. • RMA section 68 requires Council to consider the actual and potential effects of an activity before making a rule. • Not justified by analysis of actual or potential environmental effects. • Applies prior to the point of discharge and no provision is made for reasonable mixing and assimilation. The Act anticipates reasonable mixing. Plan change is inconsistent with the Act, NPS and RPS. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 308 ref. 93</i>		<ul style="list-style-type: none"> • <i>Rule overly stringent.</i>
<i>Contact Energy Limited</i>	1013	<i>Support submission 308 ref. 93</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 93</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 93</i>		
<i>Horticulture New Zealand</i>	<i>1032</i>	<i>Support submission 308 ref. 93</i>		<ul style="list-style-type: none"> • <i>For the reasons given by the submitter.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 308 ref. 93</i>		<ul style="list-style-type: none"> • <i>Despite best practice will be situations where provisions can't be met and effect on water quality after reasonable mixing will be minor.</i> • <i>Discretionary status more appropriate.</i>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 308 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 308 ref. 93</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Amend	No decision requested.	<ul style="list-style-type: none"> • Removal of offensive, objectionable or conspicuous broadens applicability, inconsistent with wording of RMA. • RMA section 68 requires Council to consider the actual and potential effects of an activity before making a rule. • Not justified by analysis of actual or potential environmental effects. • Applies prior to the point of discharge and no provision is made for reasonable mixing and assimilation. The Act anticipates reasonable mixing. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support in part submission 309 ref. 93</i>		<ul style="list-style-type: none"> • <i>Rule overly stringent.</i>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 309 ref. 93</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	<i>1029</i>	<i>Support submission 309 ref. 93</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Central Otago Wine Growers Association</i>	<i>1054</i>	<i>Support submission 309 ref. 93</i>		<ul style="list-style-type: none"> • <i>Support that changes prevent effects of discharges being assessed on case by case basis.</i> • <i>Agree prohibited status should be removed.</i> • <i>Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable.</i> • <i>Support that reasonable mixing be provided for.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 309 ref. 93</i>		<ul style="list-style-type: none"> • <i>Despite best practice will be situations where provisions can't be met and effect on water quality after reasonable mixing will be minor.</i> • <i>Inconsistent with RMA s107, needs capacity for case by case assessments.</i>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 309 ref. 93</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 309 ref. 93</i>		<ul style="list-style-type: none"> • <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>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>The NZ Transport Agency</i>	1073	Support submission 309 ref. 93		<ul style="list-style-type: none"> • Seek that the submission be allowed and the Plan Change amended as per the submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	Support in part submission 309 ref. 93		<ul style="list-style-type: none"> • Activities should only be prohibited when they have significant adverse environmental effects.
Glen Dene Limited	310	Amend	Delete rule or amend rule to provide for reasonable mixing, include qualifiers as to the level of contamination and replace prohibited activity status with discretionary status.	<ul style="list-style-type: none"> • Removal of offensive, objectionable or conspicuous broadens applicability, inconsistent with wording of RMA. • RMA section 68 requires Council to consider the actual and potential effects of an activity before making a rule. • Not justified by analysis of actual or potential environmental effects. • Applies prior to the point of discharge and no provision is made for reasonable mixing and assimilation. The Act anticipates reasonable mixing. Plan change is inconsistent with the Act, NPS and RPS. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
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>Waitaki District Council</i>	1003	Support in part submissions 310 - 326 ref. 93		<ul style="list-style-type: none"> • Rule overly stringent.
<i>Federated Farmers of New Zealand</i>	1057	Support submissions 310 – 326 ref. 93		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
<i>TrustPower</i>	1059	Support submission 323 ref. 93		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	Support submission 323 ref. 93		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	Support in part submission 326 ref. 93		<ul style="list-style-type: none"> • 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.

94 Rule 12.C.0.2 - Effects of discharge prohibited

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Tami and Jason Sargeant	24	Support	Prohibit discharges that have an obvious effect in receiving water bodies.	<ul style="list-style-type: none"> • Protect waterways for recreational purposes.
<i>Waitaki District Council</i>	1003	Oppose submission 24		<ul style="list-style-type: none"> • Submitter supports rule.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 94</i>		
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 24 ref. 94</i>		<ul style="list-style-type: none"> • <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i> • <i>Discretionary status appropriate.</i>
Jane Young	124	Amend	It should be possible to specify quantitative limits for (ii) reducing in visual clarity.	<ul style="list-style-type: none"> • Standards often qualitative not quantitative.
The Cow Farm Limited	133	Amend	Amend the rule to remove the prohibited status and allow activities whose effects are no more than minor to obtain consent.	<ul style="list-style-type: none"> • Significantly higher threshold than the RMA, prohibits activities with less than minor effects. • Cannot apply for consent for such an activity, breaches conditions of natural justice. • Contrary to purposes and principles of RMA. • Unfair, excludes activities that should be able to be consented.
<i>Waitaki District Council</i>	1003	<i>Support submission 133 ref. 94</i>		<ul style="list-style-type: none"> • <i>High threshold, excludes low impact activity.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 94</i>		<ul style="list-style-type: none"> • <i>Inconsistent with RMA.</i> • <i>Doesn't allow for situations where despite best practice provisions can't be met, even if effects on water quality after reasonable mixing are minor.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 133 ref. 94</i>		<ul style="list-style-type: none"> • <i>Support an activity status that reflects the potential effects of land use on water quality, subject to appropriate policy guidance and public notification.</i>
Waitaki District Council	138	Oppose	Delete or revise.	<ul style="list-style-type: none"> • Overly stringent. • Terms "increasing in colour", or "reducing in visual clarity" not defined or thresholds set for triggering rule. • Rule inconsistent with 12.C.1.1. Discharges will be prohibited, irrespective of 12.C.1.1.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 138 ref. 94</i>		<ul style="list-style-type: none"> • <i>Agrees rule should be deleted or revised.</i> • <i>Prohibited activity controls overly restrictive: prohibit discharges with minor effects on water quality.</i> • <i>Opposes rules inconsistent with RMA.</i>
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with DCC position.</i> • <i>Concern about economic and social impact.</i> • <i>Control measures of PC6A go far beyond those required to achieve the stated environmental results.</i>
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 138 ref. 94</i>		<ul style="list-style-type: none"> • <i>Supports attempts of Council to bring about a culture shift by providing criteria that are easy to assess, rather than relying on scientific assessments at a limited number of sites.</i>
<i>TrustPower</i>	1059	<i>Support submission 138 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 94</i>		<ul style="list-style-type: none"> • <i>Areas of concern or support are consistent with those expressed by the NZTA.</i> • <i>Control measures proposed in plan change go beyond those required to achieve the stated environmental results.</i> • <i>Seek the submission is allowed.</i>
Pioneer Generation	147	Amend	That Rule be deleted in its entirety. In the alternative, amend Rule to state: 12.C.0.2. Any discharge of contaminants to water, that after reasonable mixing, results in water:	<ul style="list-style-type: none"> • NPS does not advocate "blanket avoidance". • Act and RPS provides for reasonable mixing. • Adversely impacts on operation. • Would have significant social and economic consequences. • Section 32 inadequate in analysis of removing reasonable mixing.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			(i) Increasing in colour; or (ii) Reducing in visual clarity; or (iii) Developing an odour; or (iv) Developing an oil or grease film, scum or foam, is a non-complying activity." Any similar amendments to like effect. Any consequential amendments that stem from the amendment set out above.	<ul style="list-style-type: none"> No consideration of social and economic costs resulting from removal of mixing zones.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 147 ref. 94</i>		<ul style="list-style-type: none"> Inconsistent with Act and RPS which provide for reasonable mixing.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 147 ref. 94</i>		<ul style="list-style-type: none"> Appropriate to not provide for reasonable mixing zones. Rivers are not the solution for disposing pollution.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 147 ref. 94</i>		<ul style="list-style-type: none"> Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 147 ref. 94</i>		<ul style="list-style-type: none"> Consistent with Ernslaw One's submission.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 147 ref. 94</i>		<ul style="list-style-type: none"> Rules inconsistent with RMA. Doesn't allow for situations where even with best practice the provisions can't be met, even where after reasonable mixing effects are minor.
<i>TrustPower</i>	1059	<i>Support submission 147 ref. 94</i>		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 147 ref. 94</i>		<ul style="list-style-type: none"> 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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 147 ref. 94</i>		<ul style="list-style-type: none"> The discharge of contaminants to water is not supported. Amending the proposed activity status to non-complying is supported subject to appropriate policy guidance and public notification.
<i>City Forests</i>	1071	<i>Support submission 147 ref. 94</i>		<ul style="list-style-type: none"> Consistent with City Forest's submission.
<i>Ernslaw One Ltd</i>	149	Amend	Delete prohibited activity rule 12.C.0.2 (ii) regarding reducing visual clarity.	<ul style="list-style-type: none"> Oppose (ii). Can't guarantee no reduction in visual clarity during harvesting. Should specify a visual clarity limit instead of no change.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 149 ref. 94</i>		<ul style="list-style-type: none"> Visual clarity limit should be specified.
<i>TrustPower</i>	1059	<i>Support submission 149 ref. 94</i>		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Peter McNab</i>	192	Support	Points (iii) and (iv) - totally support. Points (i) and (ii) - support in principle.	<ul style="list-style-type: none"> Beware of the role of significant weather in causing effects.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 192</i>		<ul style="list-style-type: none"> Submitter supports rule.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 94</i>		
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	Retain rule as currently drafted.	<ul style="list-style-type: none"> • Supports rule.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • Submitter supports rule.
<i>Meridian Energy Limited</i>	1014	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • Retaining proposed rule results in an imbalance of values. • Rule overly restrictive: prohibits discharges with minor effects on water quality. • Opposes rules inconsistent with RMA.
<i>Rayonier New Zealand Limited</i>	1015	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • Inconsistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • Inconsistent with Ernslaw One's submission.
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Oppose submission 197 ref. 94</i>		<ul style="list-style-type: none"> • Inconsistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 94</i>		<ul style="list-style-type: none"> • Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
NZ Transport Agency	203	Amend	Rewrite the rules to include subordination to the permitted and discretionary rules. It is requested that Rules 12.C.0.1, 12.C.0.2 and 12.C.0.4 are deleted or revised given that the rules are overly stringent.	<ul style="list-style-type: none"> • Precedence of prohibited activity rules over other rules • Discharges are prohibited regardless of permitted and discretionary rules. • Prohibited activity rules set no minimum limits, some discharges with de minimis effects will be prohibited.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 203 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 203 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 94</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 94</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Prohibited status too high. • Uncertainty around expectations, rule unworkable.
<i>TrustPower</i>	1059	<i>Support submission 203</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 94</i>		
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 94</i>		<ul style="list-style-type: none"> • 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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 203 ref. 94</i>		<ul style="list-style-type: none"> • Support an activity status that reflects the potential effects of land use on water quality.
<i>City Forests</i>	1071	<i>Support submission 203 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>Oceana Gold (NZ) Limited</i>	1072	<i>Support submission 203 ref. 94</i>		<ul style="list-style-type: none"> • Rules inconsistent regarding the default discretionary rule 12.B.4.2 and the link to 12.C rules. • Relationship between 12.B and 12.C rules should be clarified. • 12.C rules should not apply to mining and ancillary activities.
Trustpower Limited	206	Amend	<p>As a priority, remove Rule 12.C.0.2 from the plan change and revise all other prohibited activity statuses.</p> <p>Amend Rule 12.C.0.2 by lowering the activity status and amending its content so that it is measurable and allows for a mixing zone and revise all other prohibited activity statuses.</p>	<ul style="list-style-type: none"> • Conflict between permitted and prohibited activity. • Water "increasing in colour" or "reducing in visual clarity" does not meet RMA test that, to be prohibited, the activity that would cause a given effect should not be contemplated in any circumstances. • Dam discharges of discoloured water may be classed as prohibited. • Discolouration is allowed from bed disturbance activities. More appropriate than prohibition.
<i>Waitaki District Council</i>	1003	<i>Support submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Conflict between permitted and prohibited activities. • Unclear use of terms.
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Reasons stated in the submission.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>New Zealand Wind Energy Association</i>	1030	<i>Support submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Supports the request to change and revise the activity status of all activities listed as prohibited.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 206 ref. 94</i>		<ul style="list-style-type: none"> • For the reasons given by the submitter.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Rules inconsistent with RMA. • Doesn't allow for situations where even with best practice the provisions can't be met, even where after reasonable mixing effects are minor.
<i>City Forests</i>	1071	<i>Support submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 206 ref. 94</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects.
Blakely Pacific Limited	209	Oppose	Delete Rule 12.C.0.2 (ii) regarding reducing visual clarity.	<ul style="list-style-type: none"> • Can't guaranteed that a reduction in visual clarity won't occur during harvesting.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Should specify a visual clarity limit. • Unable to avoid reduction in visual clarity.
<i>Waitaki District Council</i>	1003	<i>Support submission 209 ref. 94</i>		
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 94</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects.
Dunedin City Council	211	Amend	The Rule is deleted or revised.	<ul style="list-style-type: none"> • Overly stringent. • No discharge limits set so any discharge that gives rise to stated effects will be prohibited. • Some discharges will have de minimis effects but prohibited. • Inconsistent with Rule 12.C.1.1.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with <i>Rayonier's</i> submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with <i>Ernslaw One's</i> submission.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • No reason given.
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges. • Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
<i>Central Otago District Council</i>	1051	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges. • Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges. • Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Rules inconsistent with RMA. • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.
<i>TrustPower</i>	1059	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>City Forests</i>	1071	<i>Support submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with <i>City Forest's</i> submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 94</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects.
Fulton Hogan Limited	222	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	<ul style="list-style-type: none"> • Criteria for meeting or not meeting must be absolutely clear. • Prohibiting activities that pose limited environment risk doesn't align with RMA. • Contrary to intention of Policy 7.B.1(b) that seeks to allow discharges of contaminants that cumulatively have minor effects or are short-term. • Grouping prohibitions under 'other discharges' means that all discharges that

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				don't fit under Rules 12.A or 12.B are caught. • Doesn't give effect to RPS and RMA, by recognising mixing zones.
Waitaki District Council	1003	Support submission 222 ref. 94		• Rule unclear. • Inconsistent with Act and RPS which provide for reasonable mixing.
Rayonier New Zealand Limited	1015	Support submission 222 ref. 94		• Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support submission 222 ref. 94		• Consistent with Ernslaw One's submission.
Federated Farmers of New Zealand	1057	Support submission 222 ref. 94		• Rule not practical and vague regarding appropriate mitigation. • Sediment runoff can occur regardless of land use.
TrustPower	1059	Support submission 222 ref. 94		• Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 222 ref. 94		• 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.
City Forests	1071	Support submission 222 ref. 94		• Consistent with City Forest's submission.
Holcim (New Zealand) Limited	224	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	• Criteria for meeting or not meeting must be absolutely clear. • Prohibiting activities that pose limited environment risk doesn't align with RMA. • Contrary to intention of Policy 7.B.1(b) that seeks to allow discharges of contaminants that cumulatively have minor effects or are short-term. • Grouping prohibitions under 'other discharges' means that all discharges that don't fit under Rules 12.A or 12.B are caught. • Doesn't give effect to RPS and RMA, by recognising mixing zones.
Waitaki District Council	1003	Support submission 224 ref. 94		• Rule unclear • Inconsistent with Act and RPS which provide for reasonable mixing
Federated Farmers of New Zealand	1057	Support submission 224 ref. 94		• Rule not practical and vague regarding appropriate mitigation. • Sediment runoff can occur regardless of land use.
TrustPower	1059	Support submission 224 ref. 94		• Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 224 ref. 94		• 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.
Fonterra Co-operative Group Limited	1068	Support submission 224 ref. 94		• Inappropriate use of prohibited activity status unnecessarily constraining appropriate activities.
Kawarau Station Limited	232	Oppose	Delete rule.	• Unable to prevent all runoff (particularly stock waste) in storm event.
Federated Farmers of New Zealand	1057	Support submission 232 ref. 94		• Will be circumstances beyond farmers control. • Rule uncertain regarding what can be done to minimise runoff.
Fonterra Co-operative Group	241	Oppose	Withdraw the rule.	• No analysis showing prohibitions most appropriate options

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Limited				<ul style="list-style-type: none"> • Vulnerable to legal challenge. • Many terms not defined. • If interpreted literally would include trivial discharges. • Need to define exactly so stakeholders know what to avoid. • Not appropriate to leave discretion with consent authority. • Rules have effect so persons vulnerable to legal action. • Need to provide stakeholders certainty. • Environment Court stated criteria be "clearly specified and capable of objective attainment".
<i>Waitaki District Council</i>	1003	<i>Support submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Unclear use of terms</i> • <i>Overly stringent: activities with de minimis effects prohibited</i>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Rule is needed to maintain and enhance water quality and is capable of objective measurement.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Rule is needed to maintain and enhance water quality.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i>
<i>TrustPower</i>	1059	<i>Support submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <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>
<i>City Forests</i>	1071	<i>Support submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with relief sought by further submitter.</i>
Ravensdown Fertiliser Co-operative Ltd	248	Amend	Opposes the prohibited activity status included in Rule 12.C.0.2 and seeks the provision of these activities to be addressed in any discretionary activity rule.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • Difficult to determine what other activities are potentially caught in definition even if accidental. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. • (i) and (ii) control discharges that see slight change in clarity or colour, but have no environmental effects.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Waitaki District Council	1003	Support submission 248 ref. 94		<ul style="list-style-type: none"> Overly stringent: activities with de minimis effects prohibited Interpretation difficult
Rayonier New Zealand Limited	1015	Support in part submission 248 ref. 94		<ul style="list-style-type: none"> Partly consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support in part submission 248 ref. 94		<ul style="list-style-type: none"> Consistent with Ernslaw One's submission.
Mr RJ Borst	1034	Support submission 248 ref. 94		<ul style="list-style-type: none"> Imposed limits should be supported by science and technical data. Rules need to be clear and unambiguous. Section 32 assessment is inadequate.
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 248 ref. 94		<ul style="list-style-type: none"> Rules uncertain and confusing. Limits not realistic or achievable. Science doesn't justify stringent measures. Lack of fairness as to differing catchment and farm types. Could make farming economically unviable.
TrustPower	1059	Support submission 248 ref. 94		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 248 ref. 94		<ul style="list-style-type: none"> 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.
City Forests	1071	Support in part submission 248 ref. 94		<ul style="list-style-type: none"> Partly consistent with City Forest's submission.
New Zealand Fertiliser Manufacturers Research Association Inc	252	Amend	Opposes the prohibited activity status included in Rule 12.C.0.2 and the provision of these activities as discretionary activities.	<ul style="list-style-type: none"> Prohibitions need to give certainty. Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. Minor discharges with minor effects are prohibited. Difficult to determine what other activities are potentially caught in this

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> definition even if accidental. S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. (i) and (ii) control discharges that see slight change in clarity or colour, but have no environmental effects.
Waitaki District Council	1003	Support submission 252 ref. 94		<ul style="list-style-type: none"> Overly stringent: activities with de minimis effects prohibited Interpretation difficult
Mr RJ Borst	1034	Support submission 252 ref. 94		<ul style="list-style-type: none"> Imposed limits should be supported by science and technical data. Rules need to be clear and unambiguous. Section 32 assessment is inadequate.
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 252 ref. 94		<ul style="list-style-type: none"> Rules uncertain and confusing. Limits not realistic or achievable. Science doesn't justify stringent measures. Lack of fairness as to differing catchment and farm types. Could make farming economically unviable.
TrustPower	1059	Support submission 252 ref. 94		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 252 ref. 94		<ul style="list-style-type: none"> 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.
Queenstown Lakes District Council	255	Amend	Amend the prohibited activity rules to include minimum discharge limits.	<ul style="list-style-type: none"> Inappropriate to apply to district's urban areas. Support approach that discharges that do not comply with Schedule 16 are prohibited. Having no minimum discharge limits overly restrictive, unworkable when dealing with measurable effects which are minimal.
Waitaki District Council	1003	Support submission 255		<ul style="list-style-type: none"> Rule unworkable.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 94</i>		
<i>Dunedin City Council</i>	1025	<i>Support submission 255 ref. 94</i>		<ul style="list-style-type: none"> • Prohibitions do not set minimum discharge limits, which is overly restrictive.
<i>Clutha District Council</i>	1050	<i>Support in part submission 255 ref. 94</i>		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
<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 255 ref. 94</i>		<ul style="list-style-type: none"> • Limits unrealistic. Having no minimum discharge limits is overly restrictive.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 255 ref. 94</i>		<ul style="list-style-type: none"> • Recognition Schedules 15 and 16 don't accurately reflects variations between water bodies. • Agreed that allowance for appropriate mixing zones should be included. • Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects. • Seeks the submission be allowed and the plan change be amended as per the submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 255 ref. 94</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects. • Overly restrictive and disproportionate. • Does not take into account economic considerations.
<i>Rayonier New Zealand Ltd</i>	256	Oppose	Delete rule 12.C.0.2 (ii) regarding reducing visual clarity.	<ul style="list-style-type: none"> • Oppose (ii). • Can't guarantee no reduction in visual clarity during harvesting. • Should specify a visual clarity limit instead of no change.
<i>Waitaki District Council</i>	1003	<i>Support submission 256 ref. 94</i>		<ul style="list-style-type: none"> • Limits not defined.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 256 ref. 94</i>		<ul style="list-style-type: none"> • Rules inconsistent with RMA. • Doesn't allow for situations where even with best practice the provisions can't be met, even where after reasonable mixing effects are minor.
<i>Waitaki Irrigators Collective Limited</i>	257	Amend	Addition of the words "after reasonable mixing" before "it is a prohibited activity".	<ul style="list-style-type: none"> • Aligns with S 70 of RMA.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 257 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 257 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 257 ref. 94</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
<i>City Forests</i>	1071	<i>Support submission 257 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>North Otago Irrigation Company</i>	260	Amend	Rule 12.C.0.2 should be amended to quantify an 'increase in colour' and a 'reduction in visual clarity' at a reasonable level.	<ul style="list-style-type: none"> • Rules too subjective, literal interpretation - many minor discharges prohibited. • Clearly defined rules needed to give certainty - e.g. rule will possibly prohibit drain maintenance work.
<i>Waitaki District Council</i>	1003	<i>Support submission 260</i>		<ul style="list-style-type: none"> • Rule open to interpretation.

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		<i>ref. 94</i>		
<i>Rayonier New Zealand Limited</i>	<i>1015</i>	<i>Support submission 260 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	<i>1016</i>	<i>Support submission 260 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 260 ref. 94</i>		<ul style="list-style-type: none"> • <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i> • <i>Discretionary status appropriate.</i>
<i>John Webster</i>	<i>1063</i>	<i>Support submission 260 ref. 94</i>		<ul style="list-style-type: none"> • <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i>
<i>Peter Mitchell</i>	<i>1064</i>	<i>Support submission 260 ref. 94</i>		<ul style="list-style-type: none"> • <i>Support the NOIC submission in full.</i>
<i>City Forests</i>	<i>1071</i>	<i>Support submission 260 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
<i>Ballance Agri-Nutrients Ltd</i>	<i>262</i>	<i>Amend</i>	<i>Opposes the prohibited activity status included in Rule 12.C.0.2 and seeks the provision of these activities as discretionary activities.</i>	<ul style="list-style-type: none"> • <i>Prohibitions need to give certainty.</i> • <i>Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition.</i> • <i>Minor discharges with minor effects are prohibited.</i> • <i>Difficult to determine what other activities are potentially caught in definition even if accidental.</i> • <i>S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced.</i> • <i>Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit.</i> • <i>(i) and (ii) control discharges that see slight change in clarity or colour, but have no environmental effects.</i>
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submission 262 ref. 94</i>		<ul style="list-style-type: none"> • <i>Unclear use of terms</i> • <i>Overly stringent: activities with de minimis effects prohibited</i>
<i>Rayonier New Zealand Limited</i>	<i>1015</i>	<i>Support submission 262 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	<i>1016</i>	<i>Support submission 262 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 262 ref. 94</i>		<ul style="list-style-type: none"> • <i>Imposed limits should be supported by Science and technical data.</i> • <i>Rules need to be clear and unambiguous.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community</i>	<i>1043</i>			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Incorporated</i>				
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 94</i>		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types.
<i>TrustPower</i>	1059	<i>Support submission 262 ref. 94</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 94</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Support submission 262 ref. 94</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
Colin Scurr	268	Amend	Delete rule or amend rule to incorporate reasonable mixing, the qualifiers incorporated within the Act and replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> • Prohibited status removes all ability for consent to be granted, whether or not effects are adverse. • Removal of terms objectionable and conspicuous broadens applicability. • Does not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Does not provide for reasonable mixing or assimilation. • Inconsistent with RMA (particularly Sections 69, 70 and 107), RPS and NPSFW. • Objectives and Policies do not provide support for prohibited status.
<i>Waitaki District Council</i>	1003	<i>Support submission 268 ref. 94</i>		<ul style="list-style-type: none"> • Unclear use of terms • Overly stringent: activities with de minimis effects prohibited
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 94</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
Forest and Bird	271	Amend	Add: "(v) is likely to have a significant adverse effects on aquatic life; is a prohibited activity."	<ul style="list-style-type: none"> • Does not give full effect to RMA S107.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • Amendment sought by the submitter adds an additional matter but retains the rest.
<i>New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)</i>	1010	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • Request for additional clause (iii) is unnecessary and inappropriate, and is vague and uncertain and overly restrictive.
<i>The Director-General of Conservation</i>	1011	<i>Support submission 271 ref. 94</i>		<ul style="list-style-type: none"> • Gives effect to RMA s107.

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<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <i>Not all waterways need to be enhanced.</i> • <i>Background data required before any agricultural activities are restricted.</i>
<i>Contact Energy Limited</i>	1013	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <i>The suggested addition does not give full effect to section 107.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <i>Inconsistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <i>Threshold of "is likely to have" not sufficient for a prohibited rule.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 94</i>		<ul style="list-style-type: none"> • <i>Uncertainty around term 'likely to have', too subjective.</i> • <i>Potential to have an adverse effect doesn't justify prohibited status, inconsistent with RMA balancing.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 94</i>		<ul style="list-style-type: none"> • <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>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
City Forests	1071	Oppose submission 271 ref. 94		<ul style="list-style-type: none"> Inconsistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 271 ref. 94		<ul style="list-style-type: none"> Overly restrictive and disproportionate. Does not take into account economic considerations.
Fish and Game (Central South Island)	273	Amend	Amend to include the following: "(v) changing in temperature by more than three degrees Celsius."	<ul style="list-style-type: none"> Trout and salmon are susceptible to changes in water temperature
Waitaki District Council	1003	Oppose submission 273 ref. 94		<ul style="list-style-type: none"> Amendment sought by the submitter adds an additional matter but retains the rest.
The Director-General of Conservation	1011	Support submission 273 ref. 94		<ul style="list-style-type: none"> Indigenous fish are sensitive to temperature.
Craiglea Limited	1012	Oppose submission 273 ref. 94		<ul style="list-style-type: none"> Not all waterways should have a high standard of water quality. Affected by a variety of activities, not just agricultural uses. Imposes unnecessary constraints on farming practices.
Rayonier New Zealand Limited	1015	Support submission 273 ref. 94		<ul style="list-style-type: none"> Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support submission 273 ref. 94		<ul style="list-style-type: none"> Consistent with Ernslaw One's submission.
City Forests	1071	Support submission 273 ref. 94		<ul style="list-style-type: none"> Consistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 273 ref. 94		<ul style="list-style-type: none"> Overly restrictive and disproportionate. Does not take into account economic considerations.
Mark Kingsbury	277	Amend	Delete or amend the rule to provide for reasonable mixing, including qualifiers as to the level of contamination. Replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> Prohibited status does not allow for the effects to be considered. Rule does not provide for emergencies, exceptional circumstance, temporary discharges or discharges associated with maintenance work. No provision for reasonable mixing. Rule almost prohibits border-dyke irrigation that would put aquifer at risk of depletion and higher concentrations of N due to no flushing effect.
Waitaki District Council	1003	Support submission 277 ref. 94		<ul style="list-style-type: none"> Overly stringent: activities with de minimis effects prohibited Interpretation difficult
Federated Farmers of New Zealand	1057	Support in part submission 277 ref. 94		<ul style="list-style-type: none"> Rules inconsistent with RMA. Doesn't allow for situations where even with best practice the provisions can't be met, even where after reasonable mixing effects are minor.
Federated Farmers of New Zealand	278	Amend	Delete prohibited activity in Rule 12.C.0.2. Replace prohibited with non-complying. Adopt rule as non-complying with the following amendments: Reword rule in accordance with section 107 and provide for reasonable mixing.	<ul style="list-style-type: none"> Prohibits discharges that have any measurable effect on the receiving water at the point of discharge. Doesn't allow for situations where even with best practice the provisions can't be met, but the effects on water quality after reasonable mixing will be minor. Non-complying status is a better solution. Contrary to RPS policy 6.5.5(c). Allows for reasonable mixing as per RMA.
Waitaki District Council	1003	Support in part submission 278 ref. 94		<ul style="list-style-type: none"> Overly stringent: activities with de minimis effects prohibited Does not allow for reasonable mixing

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited status provides clarity and is essential to maintaining and improving water quality.</i> • <i>Mixing zones should not be provided for.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <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. 94</i>		<i>No reason given.</i>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited activity status is essential for certain discharges to maintain and improve water quality.</i>
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose in part submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Support an activity status that reflects the potential effects of land use activities on water quality, subject to appropriate policy guidance and public notification.</i>
<i>City Forests</i>	1071	<i>Support submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 94</i>		<ul style="list-style-type: none"> • <i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i> • <i>Activities should only be prohibited when they have significant adverse environmental effects.</i>
<i>Wenita Forest Products</i>	279	Oppose	Delete Rule 12.C.0.2 (ii) regarding reducing visual clarity.	<ul style="list-style-type: none"> • <i>Can't be guaranteed that a reduction in visual clarity won't occur during harvesting.</i> • <i>Should specify a visual clarity limit instead of no change can result.</i>
<i>New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section</i>	282	Oppose	Delete Rule 12.C.0.2 (ii) regarding reducing visual clarity.	<ul style="list-style-type: none"> • <i>Can't be guaranteed that a reduction in visual clarity won't occur during harvesting.</i> • <i>Should specify a visual clarity limit instead of no change can result.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
City Forests Limited	283	Oppose	Delete Rule 12.C.0.2 (ii) regarding reducing visual clarity.	<ul style="list-style-type: none"> • Can't be guaranteed that a reduction in visual clarity won't occur during harvesting. • Should specify a visual clarity limit instead of no change can result.
<i>Waitaki District Council</i>	1003	<i>Support submissions 279, 282 & 283 ref. 94</i>		<ul style="list-style-type: none"> • <i>Cannot guarantee activities will not reduce visual clarity.</i>
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submissions 279, 282 & 283 ref. 94</i>		<ul style="list-style-type: none"> • <i>Plan change should recognise the specific nature of plantation forestry.</i> • <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> • <i>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</i> • <i>Matters relating to reasonable mixing need to be reconsidered.</i>
<i>TrustPower</i>	1059	<i>Support submissions 279, 282 & 283 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 282 and 283 ref. 94</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for situations where even with best practice the provisions can't be met, even where after reasonable mixing effects are minor.</i>
Contact Energy Limited	284	Amend	Rule 12.C.0.2 should be amended to read: "Any discharge of contaminants to a freshwater body that results in: (i) A conspicuous change to the colour or visual clarity of the water body; (ii) Development of any objectionable odour; or (iii) Development of any conspicuous oil or grease films, scums or foams; is a non-complying activity."	<ul style="list-style-type: none"> • No provision made for short term discharges, or for ability to consider minor changes to quality characteristics. • Rule 12.C.1.6 does not cover situation fully.
<i>Waitaki District Council</i>	1003	<i>Support submission 284 ref. 94</i>		<ul style="list-style-type: none"> • <i>Does not provide for minor discharges.</i>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 284 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited status is more appropriate for these activities which are likely to result in significant adverse effects on water quality.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 284 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 284 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>TrustPower</i>	1059	<i>Support submission 284 ref. 94</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>City Forests</i>	1071	<i>Support submission 284 ref. 94</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Paterson Pitts Partners Ltd	288	Amend	That the consenting process is available for sedimentation effects that are short term and temporary in nature i.e. by inclusion of Schedule 15 into Rule 12.C.2.1.	<ul style="list-style-type: none"> • Rules (i) and (ii) are impossible to comply with. • Prohibiting is extreme; mitigation cannot achieve a consent; conflicts with RMA. • <u>Consent process must be available.</u>
<i>Waitaki District Council</i>	1003	<i>Support</i>		<ul style="list-style-type: none"> • <i>Impossible to comply with, prohibited status extreme.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 288 ref. 94</i>		
<i>Contact Energy Limited</i>	1013	<i>Support submission 288 ref. 94</i>		<ul style="list-style-type: none"> • Reasons stated in the submission.
<i>Meridian Energy Limited</i>	1014	<i>Support/Oppose in part submission 288 ref. 94</i>		<ul style="list-style-type: none"> • Temporary activities that discharge sediment for short periods of time should be made a restricted discretionary activity. • Opposes the use of Schedule 15 in managing temporary sediment discharges as the characteristics set out in Table 15.1 are subjective and do not have identified measurement locations.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 288 ref. 94</i>		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types.
<i>TrustPower</i>	1059	<i>Support submission 288 ref. 94</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 288 ref. 94</i>		<ul style="list-style-type: none"> • 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.
Southern Wood Council	289	Oppose	Delete Rule 12.C.0.2 (ii) regarding reducing visual clarity.	<ul style="list-style-type: none"> • Can't be guaranteed that a reduction in visual clarity won't occur during harvesting. • Should specify a visual clarity limit instead of no change can result.
<i>Waitaki District Council</i>	1003	<i>Support submission 289 ref. 94</i>		<ul style="list-style-type: none"> • Cannot guarantee activities will not reduce visual clarity.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 289 ref. 94</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
<i>TrustPower</i>	1059	<i>Support submission 289 ref. 94</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Clydevale Dairy Farms Ltd</i>	297	Amend	Delete the Rule or amend it to discretionary activity status that includes the qualifiers as to the level of contamination and which provides for reasonable mixing.	<ul style="list-style-type: none"> • Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report. • Not justified by any analysis of actual or potential effects. • Degree of conflict with (i) to (iv) may be minor but still prohibited. • No qualifier that discharge has to be offensive, objectionable or conspicuous. • Provision for mixing removed. • Inconsistent with RMA, NPS and RPS. • Rule does not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work, so inconsistent with S107 of RMA.
<i>Greenfield Farming Ltd</i>	298			
<i>Big River Dairy Limited</i>	299			
<i>Waitaki District Council</i>	1003	<i>Support submissions 297 - 299 ref. 94</i>		<ul style="list-style-type: none"> • Prohibited activity not justified • Removes mixing provision • Conflicting
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submissions 297 - 299 ref. 94</i>		<ul style="list-style-type: none"> • Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.
The Director-General of Conservation	306	Support	Retain in full as publicly notified.	<ul style="list-style-type: none"> • Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
ME Elston	1002	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> Provisions should reflect the actual wording in Section 107 of the Act, not the selective interpretation put forward by submitter.
Waitaki District Council	1003	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> Submitter supports rule.
Craiglea Limited	1012	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> No evidence from environmental impacts from agricultural activities. Changes are vague, unclear and open-ended. No need for further restrictions on discharges.
Meridian Energy Limited	1014	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> Retaining proposed rule results in an imbalance of values. Rule overly restrictive: prohibits discharges with minor effects on water quality. Opposes rules inconsistent with RMA.
Rayonier New Zealand Limited	1015	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> Inconsistent with Rayonier's submission.
Ernslaw One Ltd	1016	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> Inconsistent with Ernslaw One's submission.
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> 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.
Strath Taieri Community Board	1029	Oppose submission 306 ref. 94		No reason given.
Mr RJ Borst	1034	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
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	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> Very wide changes sought without evidence of environmental impact, including land management practice. Vague, unclear, open-ended changes, uncertain baseline for Council to
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
				<p>determine enhancement.</p> <ul style="list-style-type: none"> • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
TrustPower	1059	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> • 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.
Glenshee Station Limited	1062	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
City Forests	1071	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> • Inconsistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 94		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Amend	Delete rule or amend rule to incorporate reasonable mixing, the qualifiers incorporated within the Act and replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> • Removal of objectionable or conspicuous broadens applicability, inconsistent with wording of RMA. • Little scope for assessing actual effects of a discharge. Criteria (i)-(iv) exclude possibility of granting consent. Inconsistent with RMA section 68. • Applies prior to the point of discharge and no provision is made for reasonable mixing and assimilation. RMA anticipates reasonable mixing. Inconsistent with RMA, NPS and RPS. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
Waitaki District Council	1003	Support submission 308 ref. 94		<ul style="list-style-type: none"> • Inconsistent with RMA • No provision for reasonable mixing • Does not allow for reasonable mixing

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Contact Energy Limited	1013	Support submission 308 ref. 94		<ul style="list-style-type: none"> Reasons stated in the submission.
Dunedin City Council	1025	Support submission 308 ref. 94		<ul style="list-style-type: none"> No reasons given.
Strath Taieri Community Board	1029	Support submission 308 ref. 94		<ul style="list-style-type: none"> No reason given.
Horticulture New Zealand	1032	Support in part submission 308 ref. 94		<ul style="list-style-type: none"> Inclusion of reasonable mixing supported.
Federated Farmers of New Zealand	1057	Support submission 308 ref. 94		<ul style="list-style-type: none"> Despite best practice will be situations where provisions can't be met and effect on water quality after reasonable mixing will be minor. Discretionary status more appropriate.
TrustPower	1059	Support submission 308 ref. 94		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
The NZ Transport Agency	1073	Support submission 308 ref. 94		<ul style="list-style-type: none"> Seek that the submission be allowed and the Plan Change amended as per the submission.
Central Otago District Council & Clutha District Council	309	Amend	No decision requested.	<ul style="list-style-type: none"> Removal of objectionable or conspicuous broadens applicability, inconsistent with wording of RMA. Little scope for assessing actual effects of a discharge. Applies prior to the point of discharge and no provision is made for reasonable mixing and assimilation. RMA anticipates reasonable mixing. Inconsistent with RMA, NPS and RPS. Removes all ability for consent to be granted and scope for case-by-case assessment. Inconsistent with RMA section 107. Objectives and policies do not support prohibited activity status. Section 32 assessment inadequate.
Waitaki District Council	1003	Support submission 309 ref. 94		<ul style="list-style-type: none"> Inconsistent with RMA No provision for reasonable mixing Does not allow for reasonable mixing
Dunedin City Council	1025	Support submission 309 ref. 94		<ul style="list-style-type: none"> No reasons given.
Strath Taieri Community Board	1029	Support submission 309 ref. 94		<ul style="list-style-type: none"> No reason given.
Central Otago Wine Growers Association	1054	Support submission 309 ref. 94		<ul style="list-style-type: none"> Support that changes prevent effects of discharges being assessed on case by case basis. Agree prohibited status should be removed. Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable. Support that reasonable mixing be provided for.
Federated Farmers of New Zealand	1057	Support submission 309 ref. 94		<ul style="list-style-type: none"> Despite best practice will be situations where provisions can't be met and effect on water quality after reasonable mixing will be minor. Inconsistent with RMA s107, needs capacity for case by case assessments.
TrustPower	1059	Support		<ul style="list-style-type: none"> Prohibited rules should be withdrawn.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 309 ref. 94</i>		• <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 309 ref. 94</i>		• <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>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 94</i>		• <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 94</i>		• <i>Activities should only be prohibited when they have significant adverse environmental effects.</i>
Glen Dene Limited	310	Amend	Delete rule or amend rule to incorporate reasonable mixing, the qualifiers incorporated within the Act and replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> • Removal of objectionable or conspicuous broadens applicability, inconsistent with wording of RMA. • Little scope for assessing actual effects of a discharge. Criteria (i)-(iv) exclude possibility of granting consent. Inconsistent with RMA section 68. • Applies prior to the point of discharge and no provision is made for reasonable mixing and assimilation. RMA anticipates reasonable mixing. Inconsistent with RMA, NPS and RPS. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
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>Waitaki District Council</i>	1003	<i>Support submissions 310 - 326 ref. 94</i>		<ul style="list-style-type: none"> • <i>Inconsistent with RMA</i> • <i>No provision for reasonable mixing</i> • <i>Does not allow for reasonable mixing</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 - 326 ref. 94</i>		<ul style="list-style-type: none"> • <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i> • <i>Discretionary status appropriate.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submissions 320 & 323 ref. 94</i>		• <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submissions 320 & 323 ref. 94</i>		• <i>Consistent with Ernslaw One's submission.</i>
<i>City Forests</i>	1071	<i>Support submissions 320 & 323 ref. 94</i>		• <i>Consistent with City Forest's submission.</i>
<i>TrustPower</i>	1059	<i>Support</i>		• <i>Prohibited rules should be withdrawn.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 323 ref. 94</i>		• <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 94</i>		• <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>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 94</i>		• <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>

95 Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Tami and Jason Sargeant</i>	24	Support	Prohibit discharges to water, that damage property.	• <i>Protect waterways for recreational purposes.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 24 ref. 95</i>		• <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i> • <i>Discretionary status appropriate.</i>
<i>The Cow Farm Limited</i>	133	Amend	Amend the rule to remove the prohibited status and allow activities whose effects are no more than minor to obtain consent.	• <i>Significantly higher threshold than the RMA, prohibits activities with less than minor effects.</i> • <i>Cannot apply for consent for such an activity, no case-by-case assessment undertaken, breaches conditions of natural justice.</i> • <i>Contrary to purposes and principles of RMA.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 95</i>		• <i>Inconsistent with RMA.</i> • <i>Doesn't allow for situations where despite best practice provisions can't be met, even if effects on water quality after reasonable mixing are minor.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support in part submission 133 ref. 95</i>		• <i>Support an activity status that reflects the potential effects of land use on water quality, subject to appropriate policy guidance and public notification.</i>
<i>Ernslaw One Ltd</i>	149	Amend	Amend the rule to make it more precise or otherwise delete this rule, noting that Section 15 of the RMA makes any direct discharges of sediment or other contaminant to water illegal, unless approved in a Plan.	• <i>Can't accurately determine if a discharge triggers the rule or not.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 149 ref. 95</i>		• <i>For the reasons given by the submitter.</i>
<i>TrustPower</i>	1059	<i>Support submission 149 ref. 95</i>		• <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	197	Support	Retain rule as currently drafted.	• <i>Supports rule.</i>
<i>Meridian Energy Limited</i>	1014	<i>Oppose submission 197 ref. 95</i>		• <i>Retaining proposed rule results in an imbalance of values.</i> • <i>Rule overly restrictive: prohibits discharges with minor effects on water quality.</i> • <i>Opposes rules inconsistent with RMA.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Oppose submission 197 ref. 95</i>		• <i>Inconsistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Oppose</i>		• <i>Inconsistent with Ernslaw One's submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 197 ref. 95</i>		
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 95</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 197 ref. 95</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 95</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Oppose submission 197 ref. 95</i>		<ul style="list-style-type: none"> • Inconsistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 95</i>		<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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. 95</i>		<ul style="list-style-type: none"> • 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.
Blakely Pacific Limited	209	Amend	Amend the rule to make it more precise or otherwise delete this rule.	<ul style="list-style-type: none"> • Can't accurately determine if a discharge triggers the rule or not.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 209 ref. 95</i>		<ul style="list-style-type: none"> • Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff. Needs greater clarity and achievability.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 95</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects.
Fulton Hogan Limited	222	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	<ul style="list-style-type: none"> • Criteria for meeting or not meeting must be absolutely clear. • Prohibiting activities that pose limited environment risk doesn't align with RMA. • Contains no guidance as to scale of event intended to be captured by rule meaning trivial events could breach. • Grouping prohibitions under 'other discharges' means that all discharges that don't fit under Rules 12.A or 12.B are caught.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 222 ref. 95</i>		<ul style="list-style-type: none"> • Supports the carrying out of a robust Section 32 report to inform amendments of Rule 12.C.0.3.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 222 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 222 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Federated Farmers of New</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> • Rule not practical and vague regarding appropriate mitigation.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 222 ref. 95</i>		<ul style="list-style-type: none"> • <i>Sediment runoff can occur regardless of land use.</i>
<i>TrustPower</i>	1059	<i>Support submission 222 ref. 95</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 222 ref. 95</i>		<ul style="list-style-type: none"> • <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>
<i>City Forests</i>	1071	<i>Support submission 222 ref. 95</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Holcim (New Zealand) Limited	224	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	<ul style="list-style-type: none"> • Criteria for meeting or not meeting must be absolutely clear. • Prohibiting activities that pose limited environment risk doesn't align with RMA. • Contains no guidance as to scale of event intended to be captured by rule meaning trivial events could breach. • Grouping prohibitions under 'other discharges' means that all discharges that don't fit under Rules 12.A or 12.B are caught.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 224 ref. 95</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 224 ref. 95</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 224 ref. 95</i>		<ul style="list-style-type: none"> • <i>Rule not practical and vague regarding appropriate mitigation.</i> • <i>Sediment runoff can occur regardless of land use.</i>
<i>TrustPower</i>	1059	<i>Support submission 224 ref. 95</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 224 ref. 95</i>		<ul style="list-style-type: none"> • <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>
<i>Fonterra Co-operative Group Limited</i>	1068	<i>Support submission 224 ref. 95</i>		<ul style="list-style-type: none"> • <i>Inappropriate use of prohibited activity status unnecessarily constraining appropriate activities.</i>
<i>City Forests</i>	1071	<i>Support submission 224 ref. 95</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Kawarau Station Limited	232	Oppose	Delete rule.	<ul style="list-style-type: none"> • Contour irrigation may become prohibited.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 232 ref. 95</i>		<ul style="list-style-type: none"> • <i>Will be circumstances beyond farmers control.</i> • <i>Rule uncertain regarding what can be done to minimise runoff.</i>
Fonterra Co-operative Group Limited	241	Oppose	Withdraw the rule.	<ul style="list-style-type: none"> • No analysis showing prohibitions most appropriate options. • Vulnerable to legal challenge. • Many terms not defined. • If interpreted literally would include trivial discharges. • Need to define exactly so stakeholders know what to avoid. • Not appropriate to leave discretion with consent authority. • Rules have effect so persons vulnerable to legal action. • Need to provide stakeholders certainty.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> Environment Court stated criteria be "clearly specified and capable of objective attainment".
Forest and Bird NZ	1007	Oppose submission 241 ref. 95		<ul style="list-style-type: none"> Rule is needed to maintain and enhance water quality and is capable of objective measurement.
Rayonier New Zealand Limited	1015	Support submission 241 ref. 95		<ul style="list-style-type: none"> Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support submission 241 ref. 95		<ul style="list-style-type: none"> Consistent with Ernslaw One's submission.
Environmental Defence Society	1055	Oppose submission 241 ref. 95		<ul style="list-style-type: none"> Rule is needed to maintain and enhance water quality.
Federated Farmers of New Zealand	1057	Support submission 241 ref. 95		<ul style="list-style-type: none"> Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.
TrustPower	1059	Support submission 241 ref. 95		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 241 ref. 95		<ul style="list-style-type: none"> 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.
City Forests	1071	Support submission 241 ref. 95		<ul style="list-style-type: none"> Consistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 241 ref. 95		<ul style="list-style-type: none"> Consistent with relief sought by further submitter.
Ravensdown Fertiliser Co-operative Ltd	248	Oppose	Opposes the prohibited activity status included in Rule 12.C.0.3 and seeks the provision of these activities to be addressed in any discretionary activity rule.	<ul style="list-style-type: none"> Prohibitions need to give certainty. Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. Minor discharges with minor effects are prohibited. S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. Difficult to determine what other activities are potentially caught in definition even if accidental.
Rayonier New Zealand Limited	1015	Support submission 248 ref. 95		<ul style="list-style-type: none"> Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support submission 248 ref. 95		<ul style="list-style-type: none"> Consistent with Ernslaw One's submission.
Mr RJ Borst	1034	Support submission 248 ref. 95		<ul style="list-style-type: none"> Imposed limits should be supported by science and technical data. Rules need to be clear and unambiguous. Section 32 assessment is inadequate.
Mr NS Mackenzie	1035			
Mr BJ Graham	1036			
Mr TR Michelle	1037			
Dunedin International Airport Limited	1038			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr DC Greer</i>	1039			
<i>Mr RG & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 95		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types. • Could make farming economically unviable.
<i>TrustPower</i>	1059	Support submission 248 ref. 95		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	Support submission 248 ref. 95		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	Support submission 248 ref. 95		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
New Zealand Fertiliser Manufacturers Research Association Inc	252	Amend	Opposes the prohibited activity status included in Rule 12.C.0.3 and the provision of these activities as discretionary activities.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • Difficult to determine what other activities are potentially caught in this definition even if accidental. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit.
<i>Mr RJ Borst</i>	1034	Support submission 252 ref. 95		<ul style="list-style-type: none"> • Imposed limits should be supported by science and technical data. • Rules need to be clear and unambiguous. • Section 32 assessment is inadequate.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & 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 & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 95		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types. • Could make farming economically unviable.
<i>TrustPower</i>	1059	Support submission 252 ref. 95		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	Support submission 252 ref. 95		<ul style="list-style-type: none"> • 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.
Queenstown Lakes District Council	255	Amend	Amend the prohibited activity rules to include minimum discharge limits.	<ul style="list-style-type: none"> • Inappropriate to apply to district's urban areas. • Support approach that discharges that do not comply with Schedule 16 are prohibited. • Having no minimum discharge limits overly restrictive, unworkable when dealing with measurable effects which are minimal.
<i>Dunedin City Council</i>	1025	Support submission 255 ref. 95		<ul style="list-style-type: none"> • Prohibitions do not set minimum discharge limits, which is overly restrictive.
<i>Clutha District Council</i>	1050	Support in part submission 255 ref. 95		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
<i>Central Otago District Council</i>	1051	Support in part submission 255 ref. 95		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
<i>Central Otago Wine Growers Association</i>	1054	Support in part submission 255 ref. 95		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
<i>Federated Farmers of New Zealand</i>	1057	Support in part submission 255 ref. 95		<ul style="list-style-type: none"> • Limits unrealistic. Having no minimum discharge limits is overly restrictive.
<i>The NZ Transport Agency</i>	1073	Support submission 255		<ul style="list-style-type: none"> • Recognition Schedules 15 and 16 don't accurately reflects variations between water bodies.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 95</i>		<ul style="list-style-type: none"> • Agreed that allowance for appropriate mixing zones should be included. • Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects. • Seeks the submission be allowed and the plan change be amended as per the submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 255 ref. 95</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects. • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Rayonier New Zealand Ltd	256	Amend	Amend the rule to make it more precise or otherwise delete this rule.	<ul style="list-style-type: none"> • Can't accurately determine if a discharge triggers the rule or not.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 256 ref. 95</i>		<ul style="list-style-type: none"> • Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff. Needs greater clarity and achievability.
Ballance Agri-Nutrients Ltd	262	Amend	Opposes the prohibited activity status included in Rule 12.C.0.3 and seeks the provision of these activities as discretionary activities.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • Difficult to determine what other activities are potentially caught in this definition even if accidental. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 262 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 262 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 95</i>		<ul style="list-style-type: none"> • Imposed limits should be supported by Science and technical data. • Rules need to be clear and unambiguous.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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>Federated Farmers of New Zealand</i>	1057	<i>Support submission 262 ref. 95</i>		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types.
<i>TrustPower</i>	1059	<i>Support submission 262 ref. 95</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 95</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Support submission 262 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	Amend Rule 12.C.0.3 so that it is limited to discharge events that are likely to result in significant adverse effects as follows: "flooding, erosion, land instability or property damage that is likely to result in significant adverse environmental effect..." - has prohibited status.	<ul style="list-style-type: none"> • Minor impacts should be permitted or controlled.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 263 ref. 95</i>		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types.
Colin Scurr	268	Amend	Delete rule or amend to provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance and replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> • Prohibited status removes all ability for consent to be granted, • Does not allow for case by case assessments. Actual effects can not be assessed and weighed against other relevant factors. • Does not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA Section 107. • Objectives and Policies do not provide support for prohibited status.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 95</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
Federated Farmers of New Zealand	278	Amend	Delete prohibited activity in Rule 12.C.0.3. Replace prohibited with non-complying. Adopt rule as non-complying.	<ul style="list-style-type: none"> • Prohibits discharges that have any measurable effect on the receiving water at the point of discharge. • Doesn't allow for situations where even with best practice the provisions can't be met, but the effects on water quality after reasonable mixing will be minor. • Non-complying status is a better solution. • Contrary to RPS policy 6.5.5(c).
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 95</i>		<ul style="list-style-type: none"> • Practical and workable alternatives, solutions and suggestions.
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 278 ref. 95</i>		<ul style="list-style-type: none"> • Prohibited status provides clarity and is essential to maintaining and improving water quality.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 278 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 278 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Hopefield Investments Ltd</i>	1019	<i>Support</i>		<ul style="list-style-type: none"> • Operation relies on natural streams for continuing viability.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		submission 278 ref. 95		<ul style="list-style-type: none"> 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 submission 278 ref. 95		No reason given.
Environmental Defence Society	1055	Oppose submission 278 ref. 95		<ul style="list-style-type: none"> Prohibited activity status is essential for certain discharges to maintain and improve water quality.
TrustPower	1059	Support submission 278 ref. 95		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 278 ref. 95		<ul style="list-style-type: none"> 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.
Glenshee Station Limited	1062	Support in part submission 278 ref. 95		<ul style="list-style-type: none"> 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.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	1065	Oppose in part submission 278 ref. 95		<ul style="list-style-type: none"> Support an activity status that reflects the potential effects of land use activities on water quality, subject to appropriate policy guidance and public notification.
City Forests	1071	Support submission 278 ref. 95		<ul style="list-style-type: none"> Consistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 278 ref. 95		<ul style="list-style-type: none"> Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use. Activities should only be prohibited when they have significant adverse environmental effects.
Wenita Forest Products	279	Amend	Amend the rule to make it more precise or otherwise delete this rule.	<ul style="list-style-type: none"> Can't accurately determine if a discharge triggers the rule or not.
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282			
City Forests Limited	283			
Calder Stewart Industries Limited	1049	Support submissions 279, 282 & 283 ref. 95		<ul style="list-style-type: none"> Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules. Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. Matters relating to reasonable mixing need to be reconsidered.
TrustPower	1059	Support submissions 279, 282 & 283 ref. 95		<ul style="list-style-type: none"> Prohibited rules should be withdrawn. Overly restrictive and inconsistent with achieving the purpose of the RMA.
Federated Farmers of New Zealand	1057	Support submissions 282 & 283 ref. 95		<ul style="list-style-type: none"> Rule uncertain and vague regarding appropriate mitigation. Sediment runoff can occur regardless of land use.
Contact Energy Limited	284	Amend	Rule 12.C.0.3 should refer to effects on land owned by a third party	<ul style="list-style-type: none"> Rule prohibits irrespective of scale or circumstances.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			who does not consent to the effect.	<ul style="list-style-type: none"> • Would preclude damage to property owned by the discharger. • Dams must release water to discharge floods, (including contaminants), and may cause flooding, land instability, erosion, property damage downstream.
Southern Wood Council	289	Amend	Amend the rule to make it more precise or otherwise delete this rule.	<ul style="list-style-type: none"> • Can't accurately determine if a discharge triggers the rule or not.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 289 ref. 95</i>		<ul style="list-style-type: none"> • <i>Rule uncertain and vague regarding appropriate mitigation.</i> • <i>Sediment runoff can occur regardless of land use.</i>
<i>TrustPower</i>	1059	<i>Support submission 289 ref. 95</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
Clydevale Dairy Farms Ltd	297	Amend	Delete Rule or amend to discretionary activity status and provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance as permitted activities.	<ul style="list-style-type: none"> • Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report. • Not justified by any analysis of actual or potential effects. • Rule does not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work, so inconsistent with S107 of RMA.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 297 ref. 95</i>		<ul style="list-style-type: none"> • <i>Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</i>
Greenfield Farming Ltd	298	Amend	Delete Rule or amend to discretionary activity status and provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance as permitted activities.	<ul style="list-style-type: none"> • Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report. • Not justified by any analysis of actual or potential effects. • Rule does not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work, so is inconsistent with S107 of RMA.
Big River Dairy Limited	299			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submissions 298 & 299 ref. 95</i>		<ul style="list-style-type: none"> • <i>Should only be prohibitions where there's clear evidence of effects that can't be appropriately managed to ensure consistency with RMA.</i>
The Director-General of Conservation	306	Support	Retain in full as publicly notified.	<ul style="list-style-type: none"> • Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Provisions should reflect the actual wording in Section 107 of the Act, not the selective interpretation put forward by submitter.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Inconsistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Inconsistent with Ernslaw One's submission.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 95</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Central Otago District Council</i>	1051			
<i>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i>
<i>Hawkdun Station</i>	1053			
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>City Forests</i>	1071	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Inconsistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 95</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>
Clutha District Council	308	Amend	Delete rule or amend to provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance and replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
<i>Contact Energy Limited</i>	1013	<i>Support submission 308 ref. 95</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 95</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 95</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 95</i>		<ul style="list-style-type: none"> • <i>Appropriate to account for such circumstances to ensure achievability and reasonableness of rule application.</i>
<i>TrustPower</i>	1059	<i>Support submission 308 ref. 95</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 95</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 95</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 95</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 95</i>		<ul style="list-style-type: none"> • <i>Support that changes prevent effects of discharges being assessed on case by case basis.</i> • <i>Agree prohibited status should be removed.</i> • <i>Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable.</i> • <i>Support that reasonable mixing be provided for.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 95</i>		<ul style="list-style-type: none"> • <i>Will ensure greater achievability and reasonableness of rule application.</i>
<i>TrustPower</i>	1059	<i>Support submission 309</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 95</i>		
<i>Alliance Group Limited</i>	1060	<i>Support submission 309 ref. 95</i>		<ul style="list-style-type: none"> • 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>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 95</i>		<ul style="list-style-type: none"> • Seek that the submission be allowed and the Plan Change amended as per the submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 95</i>		<ul style="list-style-type: none"> • Activities should only be prohibited when they have significant adverse environmental effects.
Glen Dene Limited	310	Amend	Delete rule or amend to provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance and replace prohibited activity status with discretionary activity status.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
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. 95</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submissions 320 & 323 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submissions 320 & 323 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>City Forests</i>	1071	<i>Support submissions 320 & 323 ref. 95</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>TrustPower</i>	1059	<i>Support submission 323 ref. 95</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 95</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Support in part</i>		<ul style="list-style-type: none"> • Although it doesn't request total plan change withdrawal it recognises the rule

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 326 ref. 95</i>		<i>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>

96 Rule 12.C.0.4 - Disturbed land prohibited

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Stephen Cole	8	Amend	Rule should say "prohibit discharges from disturbed land to water until required mitigation measures are taken to avoid sediment runoff inclusive of native planting".	<ul style="list-style-type: none"> Mitigation measures should meet required ORC standard, including native planting.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Oppose submission 8 ref. 96</i>		<ul style="list-style-type: none"> <i>Submitter seeks prohibition of discharges.</i>
<i>Otago Water Resource Users Group</i>	<i>1056</i>	<i>Oppose submission 8 ref. 96</i>		<ul style="list-style-type: none"> <i>No reason given.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Oppose submission 8 ref. 96</i>		<ul style="list-style-type: none"> <i>Difficult from farm management perspective until clarification provided.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose submission 8 ref. 96</i>		<ul style="list-style-type: none"> <i>Proposed changes are overly restrictive.</i> <i>Proposed changes are disproportionate.</i>
Tami and Jason Sargeant	24	Support	Prohibit discharges from disturbed land to water, where no mitigation measures are taken to avoid sediment runoff.	<ul style="list-style-type: none"> Protect waterways for recreational purposes.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Oppose submission 24 ref. 96</i>		<ul style="list-style-type: none"> <i>Submitter seeks prohibition where no mitigation undertaken - this may not be possible.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Oppose submission 24 ref. 96</i>		<ul style="list-style-type: none"> <i>Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.</i> <i>Discretionary status appropriate.</i>
Graeme Isbister	43	Amend	Allow normal traditional cultivation methods to be used provided they do not cause any breach of major soil runoff to waterways.	<ul style="list-style-type: none"> To not allow the fallowing of soils by normal cultivation is ridiculous. Traditional cultivation still has place in agriculture. What about long term effect of herbicides, pesticides, spraying methods on environment?
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 43 ref. 96</i>		<ul style="list-style-type: none"> <i>Rule too vague, unreasonable and impractical creating uncertainty.</i>
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"> Proposed time frame places inequitable financial burden on pastoral farmers. Will devalue ORC's primary sector rating base. Inhibit development and enhancement of resources unless financial assistance granted to landholders.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 45 ref. 96</i>		<ul style="list-style-type: none"> <i>Concerns with workability.</i> <i>Despite precautions may still breach rules, making scheme unworkable with financial costs.</i>
G & S Geddes	50	Oppose	Oppose Rule 12.C.0.4.	<ul style="list-style-type: none"> Liability if runoff comes from neighbouring property. Thunderstorm causes runoff in worked paddock on property. Concerned about how it will impact farming operation.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submission 50 ref. 96</i>		<ul style="list-style-type: none"> <i>Submitter concerned about runoff during rainfall event.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Federated Farmers of New Zealand</i>	1057	Support submission 50 ref. 96		<ul style="list-style-type: none"> • Rule too vague, unworkable and impractical creating uncertainty. • More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".
Marianne & Michael Parks	51	Oppose	Any rule changes should be notified at least one year in advance of when the change is to take effect.	<ul style="list-style-type: none"> • Do not support new rules having immediate effect.
C P Mulholland	58	Amend	Permitted activity with all reasonable steps taken to lessen risk of adverse effects of water quality.	<ul style="list-style-type: none"> • Mostly use direct drilling. • Cannot control weather e.g. Flash floods. • Must turn soil over. • During lambing not practical to move stock.
<i>Waitaki District Council</i>	1003	Support in part submission 58 ref. 96		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
<i>Federated Farmers of New Zealand</i>	1057	Support submission 58 ref. 96		<ul style="list-style-type: none"> • Rule too vague, unworkable and impractical creating uncertainty. • More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".
Glenayr Ltd (D & D Sangster)	59	Amend	Should be a discretionary activity with all reasonable care and practical steps taken.	<ul style="list-style-type: none"> • Farmer cannot always mitigate in extreme weather events. • Mostly direct drill and limit cultivation but subject to adverse weather events e.g. flooding. • Put stock on dry terraces during events but not possible always e.g. lambing, pre-lamb.
<i>Waitaki District Council</i>	1003	Support in part submission 59 ref. 96		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
<i>Federated Farmers of New Zealand</i>	1057	Support submission 59 ref. 96		<ul style="list-style-type: none"> • Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff. • More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".
Phillip Hunt	60	Amend	That turbidity discharges made after weather events are allowable.	<ul style="list-style-type: none"> • Receive stormwater from road flood drain. • Causes sediment problems in ground under crop irrespective of whether direct drilled or cultivated. • Feel we would be culpable of sediment discharge.
<i>Waitaki District Council</i>	1003	Support in part submission 60 ref. 96		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
<i>Federated Farmers of New Zealand</i>	1057	Support submission 60 ref. 96		<ul style="list-style-type: none"> • Will be situations where circumstances are beyond farmers control. • Rule uncertain. • More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".
<i>Peter Mitchell</i>	1064	Support submission 60 ref. 96		<ul style="list-style-type: none"> • Support decision requested so that there is protection from discharges outside of your own control.
Green Party (Dunedin Branch)	62	Support	Strongly support these [prohibited activities].	<ul style="list-style-type: none"> • Prohibits exposed soils close to water courses.
<i>Waitaki District Council</i>	1003	Oppose submission 62 ref. 96		<ul style="list-style-type: none"> • Submitter supports rule.
<i>Craiglea Limited</i>	1012	Oppose submission 62 ref. 96		<ul style="list-style-type: none"> • No reason given.
<i>Mr RJ Borst</i>	1034	Oppose submission 62 ref. 96		<ul style="list-style-type: none"> • No reason stated.
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 62 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
Loganbrae Ltd	75	Amend	Should be a discretionary activity with all reasonable care and practical steps taken.	<ul style="list-style-type: none"> • Farmers cannot always mitigate in extreme weather events. • Mostly direct drill and limit cultivation but subject to adverse weather events e.g. flooding, snow, thunderstorms, wind. • Put stock on dry terraces during events but not possible always e.g. TB testing, weaning, scanning etc.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 75 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter concerned concerned they cannot always mitigate weather event.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 75 ref. 96</i>		<ul style="list-style-type: none"> • <i>Will be situations where circumstances are beyond farmers control.</i> • <i>Rule uncertain.</i> • <i>More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".</i>
Glen Ayr Ltd (D & C Dundass)	76	Amend	Should be a discretionary activity, with all reasonable care and practical steps taken by farmer.	<ul style="list-style-type: none"> • Crop paddocks are flat, sediment tends to pool in low spots with minimal run off. • Try to minimise impacts already e.g. divert run off so drains remain clear to the river and shifting stock during adverse weather conditions to drier paddocks.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 76 ref. 96</i>		<ul style="list-style-type: none"> • <i>Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff.</i> • <i>More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".</i>
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"> • Proposed timeframe for change places inequitable financial burden upon pastoral farmers. • Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources.
Alan L Wilson	88	Oppose	Rule 12.C.0.4 should be scrapped.	<ul style="list-style-type: none"> • High rainfall in Owaka area, runoff from essential crops sometimes unavoidable. Only covers about 2 month period, run off from roads directly to streams for 12 months - minor in comparison.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Waitaki District Council</i>	1003	<i>Support in part submission 88 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter concerned about runoff during rainfall event.</i>
Paul Corbooy	94	Support	Support PROVIDED that the sentence "where no measure has been taken to avoid sediment runoff" is retained and recognised.	<ul style="list-style-type: none"> • Farmers should endeavour to avoid runoff, but sometimes unusually heavy rainfall can overwhelm efforts.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 94 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter supports rule providing no mitigation undertaken.</i>
Albert McTainsh	122	Oppose	That 12.C.0.4 is not within the prohibited activity rules.	<ul style="list-style-type: none"> • Water quality is important, but not always possible to control of runoff or discharge of sediment from cultivated land i.e. after heavy rainfall even with mitigation.
<i>Waitaki District Council</i>	1003	<i>Support submission 122 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter concerned about runoff during rainfall event.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 122 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i> • <i>Sediment runoff can occur regardless of land use.</i>
Grant Bradfield	131	Amend	This needs clarification.	<ul style="list-style-type: none"> • Does this mean all waterways must be fenced?
The Cow Farm Limited	133	Oppose	Rule 12.C.0.4 be deleted.	<ul style="list-style-type: none"> • Vague, open to interpretation - no definition of what "measures to avoid sediment runoff" means or how it is measured. • Activities that cause some sediment runoff with only minor effect unable to be undertaken. • Prohibited status too heavy handed, unrealistic, impractical.
<i>Waitaki District Council</i>	1003	<i>Support submission 133 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule vague, unrealistic and impractical.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 96</i>		<ul style="list-style-type: none"> • <i>Inconsistent with RMA.</i> • <i>Doesn't allow for situations where despite best practice provisions can't be met, even if effects on water quality after reasonable mixing are minor.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 133 ref. 96</i>		<ul style="list-style-type: none"> • <i>Required to ensure that the discharge of contaminants directly or indirectly to water is reduced.</i>
M B & J A Mitchell	134	Oppose	There needs to be more flexibility in the proposal to deal with natural events that occur that happen with soil erosion on winter crop or cultivated paddocks.	<ul style="list-style-type: none"> • Rules accuse us of runoff that can't be controlled, as they are natural events resulting from heavy rain, droughts and snow. • Governments and councils have encouraged development of farmland in past. • Impossible to monitor contamination in all the tributaries in our catchment, enforcement action on owners of properties where stream runs out. • Rules too aggressive when farming contributes so much to Otago economy, assumes we are all bad. • Mitigating circumstances can occur.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 134 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter concerned about runoff during rainfall event.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 134 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i> • <i>Sediment runoff can occur regardless of land use.</i>
Foxhaven Farms Ltd	135	Amend	Amend the rule to provide a permitted activity to grow feed for animals and to provide more certainty that winter crops can continue to be planted throughout North Otago.	<ul style="list-style-type: none"> • Unfair to place blanket rule over normal best practice. • Extreme weather can cause silt runoff. • Any type off mitigation will have a detrimental effect on cash flow.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Uncertainty as to what mitigation might be required under each circumstance.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 135 ref. 96</i>		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event • Uncertainty of rule
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 135 ref. 96</i>		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague. • Sediment runoff can occur regardless of land use.
Mount Gowrie Station	136	Oppose	Oppose any interference with cultivation.	<ul style="list-style-type: none"> • Already mitigate risk.
Waitaki District Council	138	Oppose	Delete or revise.	<ul style="list-style-type: none"> • Overly stringent. • Standard too harsh as minor earthworks near waterways could trigger this rule during a rainfall event. • Wording too vague and will make it difficult to not be tripped up and captured as a prohibited activity.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 138 ref. 96</i>		<ul style="list-style-type: none"> • Agrees rule should be deleted or revised. • Prohibited activity controls overly restrictive: does not allow for rain or storm events. • Supports rules that are clear and balance values properly.
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with DCC position. • Concern about economic and social impact. • Control measures of PC6A go far beyond those required to achieve the stated environmental results.
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 138 ref. 96</i>		<ul style="list-style-type: none"> • Proposed rules set high standard and exceptions to this standard reduce the effectiveness of the rules.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 138 ref. 96</i>		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague. • Sediment runoff can occur regardless of land use.
<i>TrustPower</i>	1059	<i>Support submission 138 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 138 ref. 96</i>		<ul style="list-style-type: none"> • Areas of concern or support are consistent with those expressed by the NZTA. • Control measures proposed in plan change go beyond those required to achieve the stated environmental results. • Seek the submission is allowed.
Eloise Neeley	141	Oppose	I would like to see the proposed rule change not take effect immediately with a longer lead in time to work through appropriate sediment loss mitigation for winter crops.	<ul style="list-style-type: none"> • Oppose timing of the introduction of rule and impact on farmers with current winter crops without any or insufficient mitigation. • After prolonged rain event some sediment run-off may still occur despite a buffer zone. • Some farms may not be viable winter cropping if not permitted with reasonable parameters. • Even with best practice some farmers will fail to meet requirements leading to fear and suspicion, not the intent of the plan change.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 141 ref. 96</i>		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 141 ref. 96</i>		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague. • Sediment runoff can occur regardless of land use.
M L & P J Lord Family Trust	143	Amend	Amend the rule to ensure that winter crops planted at the moment will be compliant with the plan.	<ul style="list-style-type: none"> • Concerned who determines what is a suitable sediment control measure. • How do farmers know they comply with the rule?

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Provide guidance on what is an adequate mitigation measure against sediment loss. Adopted rule with amendments.	
<i>Waitaki District Council</i>	1003	<i>Support submission 143 ref. 96</i>		• <i>Rule vague.</i>
<i>Albert McTainsh</i>	1004	<i>Support submission 143 ref. 96</i>		• <i>Practical alternatives & more workable rules offered.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 143 ref. 96</i>		• <i>Rule not practical or reasonable and too vague.</i> • <i>Sediment runoff can occur regardless of land use.</i>
Pioneer Generation	147	Oppose	That Rule be deleted in its entirety. Any similar amendments to like effect. Any consequential amendments that stem from the amendment set out above.	• Potential to unduly constrain activities of energy sector. • Inappropriately uncertain. • Could be remedied if ORC sets out what is appropriate mitigation. • No policy support to justify prohibited activity status.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 147 ref. 96</i>		• <i>Rule inappropriately uncertain.</i>
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 147 ref. 96</i>		• <i>Rule necessary to prevent sedimentation of waterways.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 147 ref. 96</i>		• <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 147 ref. 96</i>		• <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 147 ref. 96</i>		• <i>No adequate justification for prohibited activity status</i> • <i>Rule not practical or reasonable and too vague.</i> • <i>Sediment runoff can occur regardless of land use.</i>
<i>TrustPower</i>	1059	<i>Support submission 147 ref. 96</i>		• <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 147 ref. 96</i>		• <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>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Oppose submission 147 ref. 96</i>		• <i>Support a reduction in the discharge of contaminants and nutrients directly or indirectly to water.</i>
<i>City Forests</i>	1071	<i>Support submission 147 ref. 96</i>		• <i>Consistent with City Forest's submission.</i>
Ernslaw One Ltd	149	Amend	Amend the rule to make it more precise or otherwise delete this rule.	• Rule is not clear enough and requires specific reference to sediment containment measures. • Would be both consistent and aligned with the new Horizons One Plan rules.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			A rule to the effect that a forest owner should review the erosion and sediment control measures listed in the NZ Forest Owner's Forest Road Engineering Manual (2012), and implement those that are applicable to the situation would give sufficient clarity.	
Waitaki District Council	1003	Support in part submission 149 ref. 96		<ul style="list-style-type: none"> • Rule vague.
TrustPower	1059	Support submission 149 ref. 96		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Trust for the estate of W J Johnston	152	Did not specify	Support reducing sediment through direct drilling and better management practices.	<ul style="list-style-type: none"> • No reason given.
Run 248m Ltd	153	Oppose	Want this rule deleted till more consideration on the effect on one of Otago's major industries.	<ul style="list-style-type: none"> • Inhibiting and restricting activities has significant impact on farming with little consideration of economic cost. • Ill conceived, draconian, threatening.
Waitaki District Council	1003	Support in part submission 153 ref. 96		<ul style="list-style-type: none"> • Rule draconian.
Corona Farms Ltd	155	Did not specify	Feel more work needs to be done on what well run modern border dyke systems can achieve.	<ul style="list-style-type: none"> • Concerned that clause does not allow ploughing of a paddock does not allow for rebordering land in future.
Ranui Partnership	158	Oppose	Oppose.	<ul style="list-style-type: none"> • Too broad. • Queries how to stop a freshly worked, steep grade paddock losing soil run off under a heavy downpour.
Waitaki District Council	1003	Support submission 158 ref. 96		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
Gerard Booth	159	Oppose	Oppose this rule at this stage.	<ul style="list-style-type: none"> • Should be more investigation, too many unknown circumstances.
Sam Kane	161	Amend	Change the wording so that the prohibited activity is run-off where appropriate and practical prevention measures have not been implemented.	<ul style="list-style-type: none"> • Even under the best management systems, may be run-off.
Waitaki District Council	1003	Support in part submission 161 ref. 96		<ul style="list-style-type: none"> • Even with mitigation measures there may still be runoff.
Contact Energy Limited	1013	Support submission 161 ref. 96		<ul style="list-style-type: none"> • Reasons stated in the submission.
Federated Farmers of New Zealand	1057	Support submission 161 ref. 96		<ul style="list-style-type: none"> • No adequate justification for prohibited activity status. • Rule too vague regarding what appropriate mitigation is. • Sediment runoff can occur regardless of land use.
Matuanui Ltd	163	Amend	Clarify what 'measure' is needed to meet this rule, who is expected to take these measures and how can they be policed.	<ul style="list-style-type: none"> • Waterways currently don't meet proposed standards. • Realistic goals needed for successful change.
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"> • Many examples of river deltas and associated problems caused by natural phenomena, that cannot be attributed to offenses associated with farming.
Waitaki District Council	1003	Support submission 166 ref. 96		<ul style="list-style-type: none"> • Submitter concerned about natural processes being caught under rule.
Federated Farmers of New Zealand	1057	Support submission 166 ref. 96		<ul style="list-style-type: none"> • Limits not achievable, science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types. • Economically unviable.
Peter McNab	192	Support	Support if land occupier makes no attempt to protect, but would not like to see pinged if made valid attempt to protect waterway.	<ul style="list-style-type: none"> • Extreme weather can affect runoff for up to 2 days, even from fenced off native bush.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Waitaki District Council</i>	1003	<i>Oppose submission 192 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter supports rule provided mitigation in place.</i>
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"> • Unreasonable to prosecute a farmer if cultivated soil washed into waterway when it rains. • Sheep farmers not the problem, shouldn't be prosecuted. • Unsustainable to sheep farm, as cultivation of paddocks is crucial.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 193 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter concerned about runoff during rainfall event.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 193 ref. 96</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between catchments or weather events that cause natural turbidity.</i> • <i>Concern with workability of timeframes.</i> • <i>Needs to be achievable and cost effective.</i>
Jeremy Wales	194	Oppose	Drop rule.	<ul style="list-style-type: none"> • Added mostly unwarranted expense.
Clyde Dairy Farm Ltd	196	Oppose	[It is] unreasonable for the Council to impose zero tolerance in extreme instances [extreme rain events].	<ul style="list-style-type: none"> • Potential nutrient run off during an extreme rain event could be good for oceans. • Landowners should apply some mitigation to heavily reduce or stop silt loss.
<i>Waitaki District Council</i>	1003	<i>Support submission 196 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter concerned about runoff during rainfall event.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 196 ref. 96</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between catchments or weather events that cause natural turbidity.</i> • <i>Concern with workability of timeframes.</i> • <i>Needs to be achievable and cost effective.</i>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	Retain rule as currently drafted.	<ul style="list-style-type: none"> • Supports rule.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 197 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter supports rule.</i>
<i>Meridian Energy Limited</i>	1014	<i>Oppose submission 197 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule in its current form inconsistent with RMA Section 107.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Oppose submission 197 ref. 96</i>		<ul style="list-style-type: none"> • <i>Inconsistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Oppose submission 197 ref. 96</i>		<ul style="list-style-type: none"> • <i>Inconsistent with Ernslaw One's submission.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 197 ref. 96</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 96</i>		<ul style="list-style-type: none"> • <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>City Forests</i>	1071	<i>Oppose submission 197</i>		<ul style="list-style-type: none"> • <i>Inconsistent with City Forest's submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 96</i>		
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 96</i>		<ul style="list-style-type: none"> • Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
Ian Bryant	199	Oppose	Oppose.	<ul style="list-style-type: none"> • Open to interpretation - is sediment naturally occurring or man made? • Queries responsibility for sediment coming off rural gravel roads, and measurement of heavy metal in runoff from highways.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 199 ref. 96</i>		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague.
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"> • 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. 96</i>		<ul style="list-style-type: none"> • 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.
NZ Transport Agency	203	Amend	Rewrite the rules to include subordination to the permitted and discretionary rules. It is requested that Rules 12.C.0.1, 12.C.0.2 and 12.C.0.4 are deleted or revised given that the rules are overly stringent. Amend Rule 12.C.0.4 to increase certainty.	<ul style="list-style-type: none"> • Clarify what "Measure... to avoid sediment runoff" is. • Unclear and uncertain for prohibited activity. • Precedence of prohibited activity rules over other rules • Discharges are prohibited regardless of permitted and discretionary rules. • Prohibited activity rules set no minimum limits, some discharges with de minimis effects will be prohibited.
<i>Waitaki District Council</i>	1003	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear • Standard too high • Activities will get caught as prohibited activities
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • No reasons given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Prohibited status too high. • Uncertainty around expectations, rule unworkable.
<i>TrustPower</i>	1059	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • 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>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui</i>	1065	<i>Oppose in part submission 203 ref. 96</i>		<ul style="list-style-type: none"> • Support an activity status that reflects the potential effects of land use on water quality.

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<i>Runanga</i>				
<i>City Forests</i>	1071	<i>Support submission 203 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
M C Holland Farming Ltd	207	Amend	That Rule 12.C.0.4 is clarified to make it certain what is required to avoid being a prohibited activity.	<ul style="list-style-type: none"> • What is 'a measure to avoid sediment runoff'? • Significant implications for everyday farming activities. • Without additional guidance or clarification uncertain if complying.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 207 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 207 ref. 96</i>		<ul style="list-style-type: none"> • No adequate justification for prohibited activity status • Rule not practical or reasonable and too vague.
Blakely Pacific Limited	209	Amend	Amend the rule to make it more precise or otherwise delete the rule.	<ul style="list-style-type: none"> • Not clear enough • Requires specific reference to sediment containment measures.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 209 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 209 ref. 96</i>		<ul style="list-style-type: none"> • Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff. Needs greater clarity and achievability.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 209 ref. 96</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects.
Lakes Landcare	210	Amend	Modify/change.	<ul style="list-style-type: none"> • Impractical not having any lead-in time for management change.
<i>Waitaki District Council</i>	1003	<i>Support submission 210 ref. 96</i>		<ul style="list-style-type: none"> • Rule impractical.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 210 ref. 96</i>		<ul style="list-style-type: none"> • Rule too vague regarding what appropriate mitigation is. • Lack of clarification makes enforcement difficult, impractical, greater lead in time necessary.
Dunedin City Council	211	Amend	The Rule is deleted or revised.	<ul style="list-style-type: none"> • Overly stringent. • No discharge limits set so any discharge that gives rise to stated effects will be prohibited. • Some discharges will have de minimis effects but prohibited. • What is 'measure...to avoid sediment runoff'. Wording too vague.
<i>Waitaki District Council</i>	1003	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear • Standard too high • Activities will get caught as prohibited activities
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • No reason given.
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges. • Prohibitions are overly restrictive and have unintended application due to

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>Schedule 16 limits.</i>
<i>Central Otago District Council</i>	1051	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges. • Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges. • Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Rules inconsistent with RMA. • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.
<i>TrustPower</i>	1059	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>City Forests</i>	1071	<i>Support submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 96</i>		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects.
T A Whiteside & Co Ltd	212	Amend	Amend rule to provide more certainty on what is considered adequate mitigation and to ensure that autumn sown cropping can continue in Otago.	<ul style="list-style-type: none"> • Concern about restrictions on autumn cultivation.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 212 ref. 96</i>		<ul style="list-style-type: none"> • Rules not practical. • Rule too vague regarding what appropriate mitigation is. • Sediment runoff can occur regardless of land use.
Willowview Pastures Ltd	214	Amend	Allowance should be made for cleaning of weed choked drains.	<ul style="list-style-type: none"> • Prevent flooding of low-lying land. • Machinery causes significant disturbance.
A P S Heckler Family Trust	218	Oppose	Oppose.	<ul style="list-style-type: none"> • Does not define mitigation. • Unclear about level of mitigation required. • Uncertain and makes it difficult to adequately manage risk.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 218 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 218 ref. 96</i>		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague.
Rimu Downs Ltd	219	Amend	The rule not take effect immediately and make exemptions for extreme weather systems.	<ul style="list-style-type: none"> • Oppose timing of introduction of rule. • Many winter crops may fail to comply with Council expectations. • No guarantees there will be no sediment runoff due to climate and local environment.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 219 ref. 96</i>		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event • Uncertainty of rule
Waverley Downs Ltd	220	Amend	Amend rule to provide more certainty on what is considered adequate mitigation and to ensure that cropping can continue in Otago.	<ul style="list-style-type: none"> • Crop establishment requires soil disturbance. • Impossible to comply with given topography.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 220 ref. 96</i>		<ul style="list-style-type: none"> • Rules not practical. • Rule too vague regarding what appropriate mitigation is. • Sediment runoff can occur regardless of land use.

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Fulton Hogan Limited	222	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	<ul style="list-style-type: none"> • Criteria for meeting or not meeting must be absolutely clear. • Prohibiting activities that pose limited environment risk doesn't align with RMA. • Ignores assimilative capacity and prohibits regardless of actual or potential effect. • 'Disturbed land' not defined therefore capturing very small discharges. • Grouping prohibitions under 'other discharges' means that all discharges that don't fit under Rules 12.A or 12.B are caught. • Doesn't give effect to RPS and RMA, by recognising mixing zones.
<i>Waitaki District Council</i>	1003	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule unclear</i> • <i>Standard too high</i> • <i>Activities will get caught as prohibited activities</i>
<i>Meridian Energy Limited</i>	1014	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <i>Agrees rule should be withdrawn.</i> • <i>Supports the carrying out of a robust Section 32 report to inform amendments of Rule 12.C.0.4.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical and vague regarding appropriate mitigation.</i> • <i>Sediment runoff can occur regardless of land use.</i>
<i>TrustPower</i>	1059	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <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>
<i>City Forests</i>	1071	<i>Support submission 222 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Holcim (New Zealand) Limited	224	Oppose	Withdraw rule and undertake further analysis to determine what activities if any should be prohibited.	<ul style="list-style-type: none"> • Criteria for meeting or not meeting must be absolutely clear. • Prohibiting activities that pose limited environment risk doesn't align with RMA. • Ignores assimilative capacity and prohibits regardless of actual or potential effect. • 'Disturbed land' not defined therefore capturing very small discharges. • Grouping prohibitions under 'other discharges' means that all discharges that don't fit under Rules 12.A or 12.B are caught. • Doesn't give effect to RPS and RMA, by recognising mixing zones.
<i>Waitaki District Council</i>	1003	<i>Support submission 224 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule unclear</i> • <i>Standard too high</i> • <i>Activities will get caught as prohibited activities</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 224 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 224 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>

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<i>Federated Farmers of New Zealand</i>	1057	Support submission 224 ref. 96		<ul style="list-style-type: none"> • Rule not practical and vague regarding appropriate mitigation. • Sediment runoff can occur regardless of land use.
<i>TrustPower</i>	1059	Support submission 224 ref. 96		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	Support submission 224 ref. 96		<ul style="list-style-type: none"> • 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>Fonterra Co-operative Group Limited</i>	1068	Support submission 224 ref. 96		<ul style="list-style-type: none"> • Inappropriate use of prohibited activity status unnecessarily constraining appropriate activities.
<i>City Forests</i>	1071	Support submission 224 ref. 96		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
Dave Shaw	226	Amend	<p>Clarify:</p> <ul style="list-style-type: none"> - What is a significant waterway and suggested mitigation responses - Whether resource consent is required for the mitigation responses. <p>Delay implementation for 12-24 months.</p>	<ul style="list-style-type: none"> • Time is needed for mitigation planning. • Rules shouldn't have legal effect now. • Need allowance for areas already in crop that may breach. • Farm management planned up to 2 years in advance so rules with immediate effect are immediately breached.
<i>Federated Farmers of New Zealand</i>	1057	Support submission 226 ref. 96		<ul style="list-style-type: none"> • Will be circumstance beyond farmers control, rule creates uncertainty. • Unfair for rules to apply to crops already planted.
Rowley Family	230	Oppose	This rule is too loose.	<ul style="list-style-type: none"> • Would make farming impossible. • Can see where ORC is heading and applaud aims but must allow common sense to prevail.
Kawarau Station Limited	232	Oppose	Delete rule.	<ul style="list-style-type: none"> • Compliance may be unattainable in storm. • "Measure" needs to be clearly defined.
<i>Waitaki District Council</i>	1003	Support submission 232 ref. 96		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
<i>Federated Farmers of New Zealand</i>	1057	Support submission 232 ref. 96		<ul style="list-style-type: none"> • Will be circumstances beyond farmers control. • Rule uncertain regarding what can be done to minimise runoff.
Michael O'Connor	234	Amend	Clarify meaning of disturbed land to water.	<ul style="list-style-type: none"> • Weather can not be predicted. • Rain on worked up land results in discharge.
<i>Waitaki District Council</i>	1003	Support submission 234 ref. 96		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
Forest Range Ltd	240	Amend	Amend rule to allow for permanent improvements to take place without penalty for short term runoff.	<ul style="list-style-type: none"> • Penalises conversion from native to improved pastures. • Short term soil loss may occur for long term benefits.
<i>Fonterra Co-operative Group Limited</i>	241	Oppose	Withdraw the rule.	<ul style="list-style-type: none"> • No analysis showing prohibitions most appropriate options. • Vulnerable to legal challenge. • Many terms not defined. • If interpreted literally would include trivial discharges. • Need to define exactly so stakeholders know what to avoid. • Not appropriate to leave discretion with consent authority. • Rules have effect so persons vulnerable to legal action. • Need to provide stakeholders certainty. • Environment Court stated criteria be "clearly specified and capable of

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				objective attainment".
<i>Waitaki District Council</i>	1003	<i>Support submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear • Standard too high • Activities will get caught as prohibited activities
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Rule is needed to maintain and enhance water quality and is capable of objective measurement.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Rule is needed to maintain and enhance water quality.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor.
<i>TrustPower</i>	1059	<i>Support submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 241 ref. 96</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Support submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with relief sought by further submitter.
<i>Ravensdown Fertiliser Co-operative Ltd</i>	248	<i>Oppose</i>	Opposes the prohibited activity status included in Rule 12.C.0.4 and seeks the provision of these activities to be addressed in any discretionary activity rule.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. • Difficult to determine what other activities are potentially caught in definition even if accidental. • Level of mitigation is not defined. Potential to fetter and unduly constrain farming activities. • No policy support for rule and provisions do not accord with RMA S 67(1)(c).
<i>Waitaki District Council</i>	1003	<i>Support submission 248 ref. 96</i>		<ul style="list-style-type: none"> • Rule vague • Minor discharges prohibited • Mitigation not defined
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 248 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.

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		<i>submission 248 ref. 96</i>		
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Support submission 248 ref. 96</i>		<ul style="list-style-type: none"> • <i>Imposed limits should be supported by science and technical data.</i> • <i>Rules need to be clear and unambiguous.</i> • <i>Section 32 assessment is inadequate.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 248 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rules uncertain and confusing.</i> • <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i> • <i>Lack of fairness as to differing catchment and farm types.</i> • <i>Could make farming economically unviable.</i>
<i>TrustPower</i>	<i>1059</i>	<i>Support submission 248 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 248 ref. 96</i>		<ul style="list-style-type: none"> • <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> • <i>Consistent with City Forest's submission.</i>
<i>City Forests</i>	<i>1071</i>	<i>Support submission 248 ref. 96</i>		
<i>Sandy Bay Ltd</i>	<i>249</i>	<i>Amend</i>	<i>Define / clarify what is a 'measure'.</i>	<ul style="list-style-type: none"> • <i>Will there be disagreements with ORC staff about what is an appropriate measure.</i> • <i>Our hill country and rainfall means that even a 10m strip would not prevent some sediment discharge.</i>
<i>New Zealand Fertiliser Manufacturers Research Association Inc</i>	<i>252</i>	<i>Amend</i>	<i>Opposes the prohibited activity status included in Rule 12.C.0.4 and the provision of these activities as discretionary activities.</i>	<ul style="list-style-type: none"> • <i>Prohibitions need to give certainty.</i> • <i>Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition.</i> • <i>Minor discharges with minor effects are prohibited.</i> • <i>Difficult to determine what other activities are potentially caught in this definition even if accidental.</i> • <i>S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. • Level of mitigation is not defined. Potential to fetter and unduly constrain farming activities. • No policy support for rule and provisions do not accord with RMA S 67(1)(c).
<i>Waitaki District Council</i>	1003	<i>Support submission 252 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule vague</i> • <i>Minor discharges prohibited</i> • <i>Mitigation not defined</i>
<i>Mr RJ Borst</i>	1034	<i>Support submission 252 ref. 96</i>		<ul style="list-style-type: none"> • <i>Imposed limits should be supported by science and technical data.</i> • <i>Rules need to be clear and unambiguous.</i> • <i>Section 32 assessment is inadequate.</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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 252 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rules uncertain and confusing.</i> • <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i> • <i>Lack of fairness as to differing catchment and farm types.</i> • <i>Could make farming economically unviable.</i>
<i>TrustPower</i>	1059	<i>Support submission 252 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 252 ref. 96</i>		<ul style="list-style-type: none"> • <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>
B Landreth Ltd	253	Amend	Inform us to what degree or measure is needed to meet this rule.	<ul style="list-style-type: none"> • Lack of clarity. • What stance will ORC take if measures fail.
<i>Waitaki District Council</i>	1003	<i>Support submission 253 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule vague.</i>
Queenstown Lakes District Council	255	Amend	Amend the prohibited activity rules to include minimum discharge limits.	<ul style="list-style-type: none"> • Inappropriate to apply to district's urban areas. • Support approach that discharges that do not comply with Schedule 16 are prohibited. • Having no minimum discharge limits overly restrictive, unworkable when

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				dealing with measurable effects which are minimal.
Waitaki District Council	1003	Support submission 255 ref. 96		<ul style="list-style-type: none"> • Rule unworkable.
Dunedin City Council	1025	Support submission 255 ref. 96		<ul style="list-style-type: none"> • Prohibitions do not set minimum discharge limits, which is overly restrictive.
Clutha District Council	1050	Support in part submission 255 ref. 96		<ul style="list-style-type: none"> • Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects. • Further clarity is needed. • PC6A should be withdrawn if concerns are not addressed. • Too complex for landowners.
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support in part submission 255 ref. 96		<ul style="list-style-type: none"> • Limits unrealistic. Having no minimum discharge limits is overly restrictive.
The NZ Transport Agency	1073	Support submission 255 ref. 96		<ul style="list-style-type: none"> • Recognition Schedules 15 and 16 don't accurately reflect variations between water bodies. • Agreed that allowance for appropriate mixing zones should be included. • Proposed prohibited rules don't set minimum discharge limits, this is overly restrictive as some prohibited will have de minimus effects. • Seeks the submission be allowed and the plan change be amended as per the submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 255 ref. 96		<ul style="list-style-type: none"> • Activities should only be prohibited where they are likely to result in significant adverse effects. • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Rayonier New Zealand Ltd	256	Oppose	Amend the rule to make it more precise or otherwise delete this rule.	<ul style="list-style-type: none"> • Rule is not clear enough and requires specific reference to sediment containment measures. • Would be both consistent and aligned with the new Horizons One Plan rules.
Waitaki District Council	1003	Support submission 256 ref. 96		<ul style="list-style-type: none"> • Rule unclear.
Federated Farmers of New Zealand	1057	Support submission 256 ref. 96		<ul style="list-style-type: none"> • Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff. Needs greater clarity and achievability.
Waitaki Irrigators Collective Limited	257	Amend	Provide a list of examples of mitigation options, or define what "no mitigation" means.	<ul style="list-style-type: none"> • Wording could result in unfairness and uncertainty. • Will ORC decide on what is mitigation measures? • Is mitigation supposed to attempt to avoid or stop it altogether? • What is put in place if natural event destroyed mitigation system?
Waitaki District Council	1003	Support submission 257 ref. 96		<ul style="list-style-type: none"> • Rule unclear • No definition of mitigation
Rayonier New Zealand Limited	1015	Support submission 257 ref. 96		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support in part submission 257 ref. 96		<ul style="list-style-type: none"> • Partly consistent with Ernslaw One's submission.
Federated Farmers of New Zealand	1057	Support submission 257 ref. 96		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague.

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<i>City Forests</i>	1071	<i>Support submission 257 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
North Otago Irrigation Company	260	Amend	Further information is required as to what constitutes a 'measure'.	<ul style="list-style-type: none"> • Rules too subjective, literal interpretation - many minor discharges prohibited. • Clearly defined rules needed to give certainty.
<i>Waitaki District Council</i>	1003	<i>Support submission 260 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule unclear.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 260 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 260 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 260 ref. 96</i>		<ul style="list-style-type: none"> • <i>More objectiveness will ensure rules more certain and minimise confusion.</i>
<i>John Webster</i>	1063	<i>Support submission 260 ref. 96</i>		<ul style="list-style-type: none"> • <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. 96</i>		<ul style="list-style-type: none"> • <i>Support the NOIC submission in full.</i>
<i>City Forests</i>	1071	<i>Support submission 260 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Ballance Agri-Nutrients Ltd	262	Amend	Opposes the prohibited activity status included in Rule 12.C.0.4 and seeks the provision of these activities as discretionary activities.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • Difficult to determine what other activities are potentially caught in this definition even if accidental. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. • Level of mitigation is not defined. Potential to fetter and unduly constrain farming activities. • No policy support for rule and provisions do not accord with RMA section 67(1)(c).
<i>Waitaki District Council</i>	1003	<i>Support submission 262 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule vague</i> • <i>Minor discharges prohibited</i> • <i>Mitigation not defined</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 262 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 262 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Mr RJ Borst</i>	1034	<i>Support</i>		<ul style="list-style-type: none"> • <i>Imposed limits should be supported by Science and technical data.</i>
<i>Mr NS Mackenzie</i>	1035	<i>submission 262</i>		<ul style="list-style-type: none"> • <i>Rules need to be clear and unambiguous.</i>

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<i>Mr BJ Graham</i>	1036	<i>ref. 96</i>		
<i>Mr TR Michelle</i>	1037			
<i>Dunedin International Airport Limited</i>	1038			
<i>Mr DC Greer</i>	1039			
<i>Mr RG & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 96</i>		<ul style="list-style-type: none"> • <i>Rules uncertain and confusing.</i> • <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i> • <i>Lack of fairness as to differing catchment and farm types.</i>
<i>TrustPower</i>	1059	<i>Support submission 262 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 96</i>		<ul style="list-style-type: none"> • <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>
<i>City Forests</i>	1071	<i>Support submission 262 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
<i>Colin Scurr</i>	268	<i>Oppose</i>	<p>Rule be deleted (sediment discharge is already dealt with in other rules).</p> <p>Define "any mitigation in place".</p>	<ul style="list-style-type: none"> • <i>Rule is impractical and void for uncertainty.</i> • <i>Uncertain in terms of steps that need to be taken to 'avoid' sedimentation.</i> • <i>No allowance for exceptional circumstances, temporary discharges, and maintenance work.</i> • <i>Does not allow for situations where sediment run-off cannot be avoided.</i> • <i>Does not allow for case by case assessments. Actual effects can not be assessed and weighed against other relevant factors.</i> • <i>Potential to clash with other rules.</i> • <i>Objectives and Policies do not provide for prohibited status.</i> • <i>Mitigation could mean anything.</i>
<i>Waitaki District Council</i>	1003	<i>Support submission 268 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule vague</i> • <i>No allowance for weather events</i> • <i>Minor discharges prohibited</i> • <i>Mitigation not defined</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i>
<i>Federated Farmers of New Zealand</i>	278	<i>Oppose</i>	The deletion of Rule 12.C.0.4.	<ul style="list-style-type: none"> • <i>Rule has immediate effect meaning breaches have already occurred.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • One-size-fits-all approach not practicable or reasonable. • Erosion and sediment runoff can occur irrespective of land use. • Options (leaving a strip of land or not cultivating) have considerable negative effects. • Rule too vague regarding what an adequate measure is. • Rule unnecessary if requested amendment to Rule 12.C.1.1 undertaken.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule vague</i> • <i>No allowance for weather events</i> • <i>Minor discharges prohibited</i> • <i>Mitigation not defined</i>
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <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. 96</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>One fits all approach is not appropriate.</i>
<i>TrustPower</i>	1059	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <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>City Forests</i>	1071	<i>Support submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 96</i>		<ul style="list-style-type: none"> • <i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i> • <i>Activities should only be prohibited when they have significant adverse environmental effects.</i>
<i>Wenita Forest Products</i>	279	Amend	Amend the rule to make it more precise or otherwise delete the rule.	<ul style="list-style-type: none"> • <i>Rule is not clear enough and requires specific reference to sediment containment measures.</i>
<i>Waitaki District Council</i>	1003	<i>Support submission 279</i>		<ul style="list-style-type: none"> • <i>Rule unclear.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 96</i>		
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 279 ref. 96</i>		<ul style="list-style-type: none"> • Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. • Matters relating to reasonable mixing need to be reconsidered.
<i>TrustPower</i>	1059	<i>Support submission 279 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Amend	Amend the rule to make it more precise or otherwise delete the rule.	<ul style="list-style-type: none"> • Rule is not clear enough and requires specific reference to sediment containment measures.
<i>Waitaki District Council</i>	1003	<i>Support submission 282 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 282 ref. 96</i>		<ul style="list-style-type: none"> • Plan change should recognise the specific nature of plantation forestry. • Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. • Matters relating to reasonable mixing need to be reconsidered.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 282 ref. 96</i>		<ul style="list-style-type: none"> • Rule uncertain and vague regarding appropriate mitigation. • Sediment runoff can occur regardless of land use.
<i>TrustPower</i>	1059	<i>Support submission 282 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
City Forests Limited	283	Amend	Amend the rule to make it more precise or otherwise delete the rule. A rule to the effect that a forest owner should review the erosion and sediment control measures listed in the NZ Forest Owner's Forest Road Engineering Manual (2012), and implement those that are applicable to the situation would give sufficient clarity.	<ul style="list-style-type: none"> • Rule is not clear enough and requires specific reference to sediment containment measures. • That would be both consistent and aligned with the new Horizons One Plan rules.
<i>Waitaki District Council</i>	1003	<i>Support submission 283 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Calder Stewart Industries Limited</i>	1049	<i>Support submission 283 ref. 96</i>		<ul style="list-style-type: none"> • Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. • Matters relating to reasonable mixing need to be reconsidered.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 283 ref. 96</i>		<ul style="list-style-type: none"> • Rule uncertain and vague regarding appropriate mitigation. • Sediment runoff can occur regardless of land use.
<i>TrustPower</i>	1059	<i>Support submission 283 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Contact Energy Limited	284	Amend	Rule 12.C.0.4 should refer to disturbed land not already covered or partly covered by water.	<ul style="list-style-type: none"> • Land covered by water is 'land', so rule prohibits sediment disturbed on the bed or banks of a lake or river.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Rule would include circumstances where rights are held to disturb land owned by a third party.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 284 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 284 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>City Forests</i>	1071	<i>Support submission 284 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
Southern Wood Council	289	Amend	<p>Amend the rule to make it more precise or otherwise delete the rule.</p> <p>A rule to the effect that a forest owner should review the erosion and sediment control measures listed in the NZ Forest Owner's Forest Road Engineering Manual (2012), and implement those that are applicable to the situation would give sufficient clarity. That would be both consistent and aligned with the new Horizons One Plan rules.</p>	<ul style="list-style-type: none"> • Rule is not clear enough and requires specific reference to sediment containment measures.
<i>Waitaki District Council</i>	1003	<i>Support submission 289 ref. 96</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 289 ref. 96</i>		<ul style="list-style-type: none"> • Rule uncertain and vague regarding appropriate mitigation. • Sediment runoff can occur regardless of land use.
<i>TrustPower</i>	1059	<i>Support submission 289 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Janefield Farm	296	Amend	<p>For 12.C.0.5 [12.C.0.4] would like to see the proposed rule change not take effect immediately with a longer lead in time to work through appropriate sediment loss mitigation for winter crops.</p>	<ul style="list-style-type: none"> • Timing of rule has potential to affect farmers with winter crops. • Farmers forced to make judgement call on what constitute measures. • Heavy rainfall, even with buffer sediment runoff could occur.
<i>Waitaki District Council</i>	1003	<i>Support submission 296 ref. 96</i>		<ul style="list-style-type: none"> • Submitter concerned about runoff during rainfall event.
<i>Albert McTainsh</i>	1004	<i>Support submission 296 ref. 96</i>		<ul style="list-style-type: none"> • Provides science-based, workable and practical suggestions.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 296 ref. 96</i>		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague.
Clydevale Dairy Farms Ltd	297	Oppose	Delete Rule 12.C.0.4.	<ul style="list-style-type: none"> • Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report. • Not justified by any analysis of actual or potential effects. • Impractical as does not provide for discharges that are temporary or result from maintenance work or exceptional circumstances. • Sediment runoff often unavoidable. • Steps needed to avoid sedimentation unclear.
Greenfield Farming Ltd	298			
Big River Dairy Limited	299			
<i>Waitaki District Council</i>	1003	<i>Support submissions 297 - 299</i>		<ul style="list-style-type: none"> • Prohibited activity too stringent • Rule impractical and unclear

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		<i>ref. 96</i>		
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 297 - 299 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i> • <i>Sediment runoff often unavoidable.</i>
Allan Kirkland	303	Oppose	Opposes rule.	<ul style="list-style-type: none"> • Erosion is a natural event and no point fining farmers for this. • Cows seeking shelter on a wet windy night could cause an area of bare soil and subsequent runoff. • Stressful farming in ponding area on Taieri Plains during heavy rainfall without having to worry about this as well.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 303 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i> • <i>More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".</i>
The Director-General of Conservation	306	Support	Retain in full as publicly notified.	<ul style="list-style-type: none"> • Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <i>Provisions should reflect the actual wording in Section 107 of the Act, not the selective interpretation put forward by submitter.</i>
<i>Waitaki District Council</i>	1003	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <i>Submitter supports rule.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <i>Inconsistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 96</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & 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
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. 96		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 96		<ul style="list-style-type: none"> • Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.
TrustPower	1059	Oppose submission 306 ref. 96		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Oppose submission 306 ref. 96		<ul style="list-style-type: none"> • 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.
Glenshee Station Limited	1062	Oppose submission 306 ref. 96		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
City Forests	1071	Oppose submission 306 ref. 96		<ul style="list-style-type: none"> • Inconsistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 96		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 96		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Oppose	Rule 12.C.0.4 be deleted.	<ul style="list-style-type: none"> • Sediment discharge already dealt with in other rules. • Uncertain what steps need to be taken to 'avoid' sedimentation. • Does not provide for situations where sediment runoff cannot be avoided. • Potential for clashes with other section 12.C rules. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				discharges or discharges associated with maintenance work. <ul style="list-style-type: none"> • Inconsistent with RMA Part II and section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
<i>Waitaki District Council</i>	1003	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule unclear</i> • <i>Sedimentation unavoidable</i>
<i>Contact Energy Limited</i>	1013	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Horticulture New Zealand</i>	1032	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule is impractical and unworkable</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i>
<i>TrustPower</i>	1059	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 96</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
Central Otago District Council & Clutha District Council	309	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Rule uncertain and does not provide for situations where sediment runoff can not be avoided. • Doesn't provide for temporary discharges, maintenance works and exceptional circumstances. • Prohibited status removes possibility for effects to be assessed against relevant factors • Section 32 assessment inadequate.
<i>Waitaki District Council</i>	1003	<i>Support submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule unclear</i> • <i>Sedimentation unavoidable</i>
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <i>Support that changes prevent effects of discharges being assessed on case by case basis.</i> • <i>Agree prohibited status should be removed.</i> • <i>Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable.</i> • <i>Support that reasonable mixing be provided for.</i>
<i>Federated Farmers of New</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i>

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<i>Zealand</i>		<i>submission 309 ref. 96</i>		
<i>TrustPower</i>	1059	<i>Support submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <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>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 96</i>		<ul style="list-style-type: none"> • <i>Activities should only be prohibited when they have significant adverse environmental effects.</i>
Glen Dene Limited	310	Oppose	Rule 12.C.0.4 be deleted.	<ul style="list-style-type: none"> • Sediment discharge already dealt with in other rules. • Uncertain what steps need to be taken to 'avoid' sedimentation. • Does not provide for situations where sediment runoff cannot be avoided. • Potential for clashes with other section 12.C rules. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA Part II and section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
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>Waitaki District Council</i>	1003	<i>Support in part submissions 310 - 326 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule unclear</i> • <i>Discharges unavoidable</i> • <i>Prohibited activity too stringent</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 310 - 326 ref. 96</i>		<ul style="list-style-type: none"> • <i>Rule not practical or reasonable and too vague.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submissions 319, 320 & 323 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submissions 319, 320 & 323 ref. 96</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>

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<i>City Forests</i>	1071	<i>Support submissions 319, 320 & 323 ref. 96</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>TrustPower</i>	1059	<i>Support submission 323 ref. 96</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 96</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 96</i>		<ul style="list-style-type: none"> • 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.
Lake Edge Farms Ltd	333	Oppose	Need more time to prepare for avoiding total stopping of sediment.	<ul style="list-style-type: none"> • No one wants to see paddocks run down the drain. • Farmers can get caught out. • While stock are on crop they aren't messing up other pastures.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 333 ref. 96</i>		<ul style="list-style-type: none"> • Rule not practical or reasonable and too vague.

97 Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Tami and Jason Sargeant	24	Support	Prohibit discharges to water from animal waste systems, silage storage or a composting process.	<ul style="list-style-type: none"> • Protect waterways for recreational purposes.
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 24 ref. 97</i>		<ul style="list-style-type: none"> • Despite best practice will be situations where provisions can't be met, and effect after reasonable mixing will be minor. • Discretionary status appropriate.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 24 ref. 97</i>		<ul style="list-style-type: none"> • Oppose submissions seeking to retain prohibited status rules. • Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option. • Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds. • With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand.
Hopfield 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"> • Proposed time frame places inequitable financial burden on pastoral farmers. • Will devalue ORC's primary sector rating base. • Inhibit development and enhancement of resources unless financial assistance granted to landholders.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 45 ref. 97</i>		<ul style="list-style-type: none"> • Concerns with workability. • Despite precautions may still breach rules, making scheme unworkable with financial costs.
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"> • Have a Regionally Significant Wetland. • Every farm has different circumstances and a lot of our swamp is at times dryland.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 59 ref. 97</i>		<ul style="list-style-type: none"> • Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff. • More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Green Party (Dunedin Branch)	62	Support	Strongly support these [prohibited activities].	<ul style="list-style-type: none"> • Effluent management. • No reason given.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 62 ref. 97</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			
<i>Mr RG & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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 62 ref. 97</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 62 ref. 97</i>		<ul style="list-style-type: none"> • Oppose submissions seeking to retain prohibited status rules. • Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option. • Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds. • With uncertainty over whether the rules would apply to its consented discharge Silver Fern Farms supports withdrawal of the rules as they stand.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 62 ref. 97</i>		<ul style="list-style-type: none"> • Does not allow flexibility for existing farming operations to give effect to the NPS. • Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime. • Does to take into account local environmental conditions and economic/development consideration. • Disproportionate and overly restrictive.
Loganbrae Ltd	75	Amend	Needs to be a discretionary activity.	<ul style="list-style-type: none"> • Have a Regionally Significant Wetland. • Every farm has different circumstances and a lot of our swamp is at times dryland.
Glen Ayr Ltd (D & C Dundass)	76	Amend	Needs to be a discretionary activity.	<ul style="list-style-type: none"> • Concerned about implications for significant wetlands. • Farming practices differ between farms e.g. Sheep/beef compared to dairy.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 76 ref. 97</i>		<ul style="list-style-type: none"> • Will be situations beyond farmers control, uncertainty about what they can do to minimise such runoff. • More appropriate for farmers to take "all reasonable steps to avoid the

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>discharge of sediment from land to water".</i>
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"> Proposed timeframe for change places inequitable financial burden upon pastoral farmers. Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources.
The Cow Farm Limited	133	Oppose	Amend the rule to remove the prohibited status and allow activities whose effects are no more than minor to obtain consent.	<ul style="list-style-type: none"> Vague terms that lack definition or clarity, e.g. "ponding". Significantly higher threshold than the RMA, prohibits activities with less than minor effects. Cannot apply for consent for such an activity, no case-by-case assessment undertaken, breaches conditions of natural justice. Contrary to purposes and principles of RMA.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 133 ref. 97</i>		<ul style="list-style-type: none"> <i>Inconsistent with RMA.</i> <i>Doesn't allow for situations where despite best practice provisions can't be met, even if effects on water quality after reasonable mixing are minor.</i>
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	<i>1065</i>	<i>Oppose submission 133 ref. 97</i>		<ul style="list-style-type: none"> <i>Support an activity status that reflects the potential effects of land use on water quality, subject to appropriate policy guidance and public notification.</i>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 133 ref. 97</i>		<ul style="list-style-type: none"> <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i> <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> <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>
Clutha Agricultural Development Board	139	Amend	It is the effect of ponding that should be prohibited not the fact that it may cause problems in the waterways.	<ul style="list-style-type: none"> Should be consistent with the effects-based approach of the Water Quality Strategy.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 139 ref. 97</i>		<ul style="list-style-type: none"> <i>If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects.</i>
New Zealand Pork Industry Board	145	Amend	Amend 12.C.0.5 to state: "Any discharge of contaminants from an animal waste system, silage storage or a composting process: (i) - (iii) (iv) That enters water from land providing that more than twelve hours after rain ceases on the site, the quantity of contaminant in the discharge exceeds the limits given in Schedule 16, where the discharge is about to enter water; or (v) That results in ponding; is a prohibited activity"	<ul style="list-style-type: none"> Clarifies rule only covers discharges to land that fall outside the parameters of Rule 12.C.1.2 with reference to Schedule 16.
Dairy NZ Limited	146	Oppose	Withdraw the rule. Rule should be redrafted to include a definition such as "Ponding means liquid that remains on the surface of land for longer than two hours"	<ul style="list-style-type: none"> No definition of ponding. May prohibit discharges to land where underlying groundwater. No analysis showing prohibitions most appropriate options Vulnerable to legal challenge. Many terms not defined. If interpreted literally would include trivial discharges. Need to define exactly so stakeholders know what to avoid.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Not appropriate to leave discretion with consent authority. • Rules have effect so persons vulnerable to legal action. • Need to provide stakeholders certainty. • Environment Court stated criteria be "clearly specified and capable of objective attainment"
<i>Forest and Bird NZ</i>	1007	<i>Oppose submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>Rule should not be deleted. Prohibited discharges have the potential to cause adverse effects.</i>
<i>Otago Fish and Game Council</i>	1027	<i>Neither support nor oppose submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>Rule should not be deleted, as the prohibited discharges have the potential to cause adverse effects.</i>
<i>Environmental Defence Society</i>	1055	<i>Oppose submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>Rule should not be deleted: prohibited discharges have the potential to cause adverse effects.</i> • <i>Rule can be amended to address perceived issues.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects.</i>
<i>TrustPower</i>	1059	<i>Support submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>Activities should only be prohibited where they are likely to result in significant 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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 97</i>		<ul style="list-style-type: none"> • <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
Gerard Booth	159	Oppose	Revisit.	<ul style="list-style-type: none"> • Standards unachievable.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 159 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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</i>

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				<i>of the submissions.</i>
Sam Kane	161	Amend	Change the wording so that the prohibited activity is run-off where appropriate and practical prevention measures have not been implemented.	<ul style="list-style-type: none"> • Even under the best management systems, may be run-off.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 161 ref. 97</i>		<ul style="list-style-type: none"> • <i>No adequate justification for prohibited activity status.</i> • <i>Rule too vague regarding what appropriate mitigation is.</i> • <i>Sediment runoff can occur regardless of land use.</i>
Matuanui Ltd	163	Amend	Rewrite rule as permitted activity as per rules in current plan to recognise that some contaminants will get to water in some form (that will be a minor effect).	<ul style="list-style-type: none"> • Agree leachates shouldn't get to water, but in adverse weather with best practice, cannot guarantee they won't. • No recognition of natural processes.
Lovells Creek Farm Ltd	189	Amend	Is not a prohibited activity when a heavy rain causes local flooding and the owner has already taken action to mitigate contaminant leakage in normal circumstances.	<ul style="list-style-type: none"> • No control over where contaminants go in major flooding. • Want ORC guidelines/rules which can be tried to see if they work.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 189 ref. 97</i>		<ul style="list-style-type: none"> • <i>Will be situations where circumstances are beyond farmers control.</i> • <i>Rule uncertain.</i> • <i>More appropriate for farmers to take "all reasonable steps to avoid the discharge of sediment from land to water".</i>
Peter McNab	192	Support	Support.	<ul style="list-style-type: none"> • No reason given.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 192 ref. 97</i>		<ul style="list-style-type: none"> • <i>Oppose submissions seeking to retain prohibited status rules.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Support	Retain rule as currently drafted.	<ul style="list-style-type: none"> • Supports rule.
<i>TrustPower</i>	1059	<i>Oppose submission 197 ref. 97</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 197 ref. 97</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 97</i>		<ul style="list-style-type: none"> • <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 submission 197 ref. 97</i>		<ul style="list-style-type: none"> • <i>Oppose submissions seeking to retain prohibited status rules.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 97</i>		<ul style="list-style-type: none"> • <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
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"> • Costs associated with compliance. • Proposed time frames insufficient. • Unknown implementation management of changes by ORC.

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 200 ref. 97</i>		<ul style="list-style-type: none"> • 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.
M C Holland Farming Ltd	207	Amend	Delete clause (ii) of Rule 12.C.0.5 or clarify the definition of 'animal waste system'.	<ul style="list-style-type: none"> • A portion of effluent will leach to groundwater therefore prohibiting effluent application.
Lakes Landcare	210	Oppose	Modify/change.	<ul style="list-style-type: none"> • Impractical not having any lead-in time for management change if effects are more than minor.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 210 ref. 97</i>		<ul style="list-style-type: none"> • Rule too vague regarding what appropriate mitigation is. • Lack of clarification makes enforcement difficult, impractical, greater lead in time necessary.
Hamish Anderson	221	Oppose	Clarification requested: Is ponding just slow infiltration especially on deep alluvial silts?	<ul style="list-style-type: none"> • Slow infiltration desirable. • Discharging on stony silt loam results in effluent passing root zone into groundwater, visually good outcome but not environmentally.
Michael O'Connor	234	Amend	Clarify meaning of "a composting process".	<ul style="list-style-type: none"> • Grass sprayed with roundup results in composting, so do leaves off trees.
Silver Fern Farms Limited	238	Amend	Withdraw prohibited activity rule 12.C.0.5. In the alternative, change the activity status of this rule to discretionary. Clarification on the definition of animal waste system. Would like a determination that its waste water is not classified as being from an animal waste system and does not fall under the prohibited activity classification.	<ul style="list-style-type: none"> • No provision for reasonable mixing. • Would make our consented discharge prohibited. • Unreasonable and unjust. • No analysis why prohibition most appropriate option. • Many terms not well defined, current definition too broad. • Some waste streams from a single industrial/trade operation may fall under rule. • No consideration of the degree of treatment, even if it meets proposed limits.
<i>TrustPower</i>	1059	<i>Support submission 238 ref. 97</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Fonterra Co-operative Group Limited	241	Amend	Rule should be redrafted to include a definition such as "Ponding means liquid that remains on the surface of land for longer than two hours"	<ul style="list-style-type: none"> • No definition of ponding. • May prohibit discharges to land where underlying groundwater. • No analysis showing prohibitions most appropriate options • Vulnerable to legal challenge. • Many terms not defined. • If interpreted literally would include trivial discharges. • Need to define exactly so stakeholders know what to avoid. • Not appropriate to leave discretion with consent authority. • Rules have effect so persons vulnerable to legal action. • Need to provide stakeholders certainty. • Environment Court stated criteria be "clearly specified and capable of objective attainment"
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 241 ref. 97</i>		<ul style="list-style-type: none"> • If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects.
<i>Alliance Group Limited</i>	1060	<i>Support submission 241 ref. 97</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 97</i>		<ul style="list-style-type: none"> • Consistent with relief sought by further submitter.
Ravensdown Fertiliser Co-operative	248	Oppose	Opposes the prohibited activity status included in Rule 12.C.0.5	<ul style="list-style-type: none"> • Prohibitions need to give certainty.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Ltd			and seeks the provision of these activities to be addressed in any discretionary activity rule.	<ul style="list-style-type: none"> • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. • Difficult to determine what other activities are potentially caught in definition even if accidental. • Terms 'saturated land' and 'ponding' are not defined or effects based.
Mr RJ Borst	1034	Support submission 248 ref. 97		<ul style="list-style-type: none"> • Imposed limits should be supported by science and technical data. • Rules need to be clear and unambiguous. • Section 32 assessment is inadequate.
Mr NS Mackenzie	1035	Support submission 248 ref. 97		<ul style="list-style-type: none"> • Imposed limits should be supported by science and technical data. • Rules need to be clear and unambiguous. • Section 32 assessment is inadequate.
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 248 ref. 97		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types. • Could make farming economically unviable.
TrustPower	1059	Support submission 248 ref. 97		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 248 ref. 97		<ul style="list-style-type: none"> • 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.
Silver Fern Farms Limited	1070	Support in part submission 248 ref. 97		<ul style="list-style-type: none"> • Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification. • Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option. • Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • <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>
New Zealand Fertiliser Manufacturers Research Association Inc	252	Amend	Opposes the prohibited activity status included in Rule 12.C.0.5 and the provision of these activities as discretionary activities.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • Difficult to determine what other activities are potentially caught in this definition even if accidental. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. • The terms 'saturated land' and 'ponding' are not defined or effects based.
Mr RJ Borst	1034	Support submission 252 ref. 97		<ul style="list-style-type: none"> • <i>Imposed limits should be supported by science and technical data.</i> • <i>Rules need to be clear and unambiguous.</i> • <i>Section 32 assessment is inadequate.</i>
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 252 ref. 97		<ul style="list-style-type: none"> • <i>Rules uncertain and confusing.</i> • <i>Limits not realistic or achievable. Science doesn't justify stringent measures.</i> • <i>Lack of fairness as to differing catchment and farm types.</i> • <i>Could make farming economically unviable.</i>
TrustPower	1059	Support submission 252 ref. 97		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
Alliance Group Limited	1060	Support submission 252 ref. 97		<ul style="list-style-type: none"> • <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>
Silver Fern Farms Limited	1070	Support in part submission 252		<ul style="list-style-type: none"> • <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 97</i>		<ul style="list-style-type: none"> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
Queenstown Lakes District Council	255	Amend	Amend the prohibited activity rules to include minimum discharge limits.	<ul style="list-style-type: none"> • <i>Inappropriate to apply to district's urban areas.</i> • <i>Support approach that discharges that do not comply with Schedule 16 are prohibited.</i> • <i>Having no minimum discharge limits overly restrictive, unworkable when dealing with measurable effects which are minimal.</i>
<i>Dunedin City Council</i>	<i>1025</i>	<i>Support submission 255 ref. 97</i>		<ul style="list-style-type: none"> • <i>Prohibitions do not set minimum discharge limits, which is overly restrictive.</i>
<i>Clutha District Council</i>	<i>1050</i>	<i>Support in part submission 255 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support submission in relation to minimum discharge limits and the need to tie restrictions to environmental effects.</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>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 255 ref. 97</i>		<ul style="list-style-type: none"> • <i>Limits unrealistic. Having no minimum discharge limits is overly restrictive.</i>
<i>The NZ Transport Agency</i>	<i>1073</i>	<i>Support submission 255 ref. 97</i>		<ul style="list-style-type: none"> • <i>Recognition Schedules 15 and 16 don't accurately reflects 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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose submission 255 ref. 97</i>		<ul style="list-style-type: none"> • <i>Activities should only be prohibited where they are likely to result in significant adverse effects.</i> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
North Otago Irrigation Company	260	Amend	Provide a definition of ponding. For example, "Ponding is liquid that remains on the surface of land for longer than two hours."	<ul style="list-style-type: none"> • <i>Rules too subjective, literal interpretation - many minor discharges prohibited.</i> • <i>Clearly defined rules needed to give certainty.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 260 ref. 97</i>		<ul style="list-style-type: none"> • <i>If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects.</i> • <i>Need to be able to consider on case by case basis.</i> • <i>Inconsistent with RMA s107.</i>
<i>John Webster</i>	<i>1063</i>	<i>Support submission 260 ref. 97</i>		<ul style="list-style-type: none"> • <i>Our farm is irrigated through NOIC, their submission covers issues in the plan that certainly will affect us.</i>
<i>Peter Mitchell</i>	<i>1064</i>	<i>Support submission 260 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support the NOIC submission in full.</i>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Support in part submission 260 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<p><i>most appropriate option.</i></p> <ul style="list-style-type: none"> • Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds. • 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.
Ballance Agri-Nutrients Ltd	262	Amend	Opposes the prohibited activity status included in Rule 12.C.0.5 and seeks the provision of these activities as discretionary activities.	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving discretion with ORC to determine prohibition. • Minor discharges with minor effects are prohibited. • Difficult to determine what other activities are potentially caught in this definition even if accidental. • S 32 Report inadequately assesses the use of prohibited activity status. S 32 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit. • Terms 'saturated land' and 'ponding' are not defined or effects based.
<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 & Mrs SS Burdon</i> <i>Mr TE & Mrs JA Craig</i> <i>Mr DJ & Mrs JC Andrew</i> <i>Macraes Community Incorporated</i> <i>Mr GV & Mrs RE Gardner</i> <i>Mr AWB Elliot</i> <i>Mrs J Hodge</i> <i>Mr RP & 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. 97		<ul style="list-style-type: none"> • Imposed limits should be supported by Science and technical data. • Rules need to be clear and unambiguous.
Federated Farmers of New Zealand	1057	Support submission 262 ref. 97		<ul style="list-style-type: none"> • Rules uncertain and confusing. • Limits not realistic or achievable. Science doesn't justify stringent measures. • Lack of fairness as to differing catchment and farm types.
TrustPower	1059	Support submission 262 ref. 97		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
Alliance Group Limited	1060	Support submission 262 ref. 97		<ul style="list-style-type: none"> • 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.

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<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 262 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263	Amend	<p>Amend Rule 12.C.0.5 by deleting subparagraph (ii),(iv) and (v) so that the rule reads as follows: 12.C.0.5 Any discharge of contaminants from an animal waste system, silage storage or a composting process: (i) to a water body; or (ii) to a conduit to water, or the bed of any lake or river, or Regionally Significant Wetland; is a prohibited activity.</p> <ul style="list-style-type: none"> • Discharge of contaminants from an animal waste system to saturated land; • Discharge that results in ponding; • Treated discharge the enters water from land - should be classified prohibited activities under Rule 12.C.0.5 where they are likely to result in significant adverse effects. 	<ul style="list-style-type: none"> • Current wording disproportionate, ineffective or inefficient for farms. • Minor impacts should be permitted or controlled.
Colin Scurr	268	Amend	<p>Rule be amended as follows: - Prohibited Activity status changed to discretionary. - Rule made subject to subsequent rules providing for discharges. - "Ponding" to refer to water standing for 72 hours. - Provision for emergencies, exceptional circumstances, temporary discharges, or discharges associated with maintenance work.</p>	<ul style="list-style-type: none"> • Uncertain and includes double-ups and inconsistencies. • Is 'water ' in (iv) water within waterbody? • 'Ponding' is uncertain. How long must surface water be present before it is a 'pond'. • Rule is absolute despite other provisions providing for some discharges. • Does not provide for emergencies, exceptional circumstances, temporary discharges or discharges from maintenance work. • Does not allow for assessment of a discharge under Part II RMA. • Objectives and Policies do not support prohibited status.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 97</i>		<ul style="list-style-type: none"> • <i>If truly effects based difficult to see how prohibited status reached.</i> • <i>Doesn't allow for careful/low rate application that manages risk.</i>
Forest and Bird	271	Amend	<p>Amend to read: "Any discharge of contaminants from an animal waste system, including farm waste dumps, ofal pits, silage storage or a composting or similar process: ... (v) is likely to have a significant adverse effects on aquatic life; is a prohibited activity."</p>	<ul style="list-style-type: none"> • Does not give full effect to RMA S107. • Does not capture farm waste dumps, including ofal pits.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 97</i>		<ul style="list-style-type: none"> • <i>Not all waterways need to be enhanced.</i> • <i>Limitations on animal waste discharges are unnecessary and inappropriate.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 97</i>		<ul style="list-style-type: none"> • <i>Limitations on animal waste discharges are unnecessary and inappropriate.</i>
<i>Mr NS Mackenzie</i>	1035			
<i>Mr BJ Graham</i>	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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 97</i>		<ul style="list-style-type: none"> • <i>Uncertainty around term 'likely to have', too subjective.</i> • <i>Potential to have an adverse effect doesn't justify prohibited status, inconsistent with RMA balancing.</i>
<i>TrustPower</i>	1059	<i>Oppose submission 271 ref. 97</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 271 ref. 97</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 97</i>		<ul style="list-style-type: none"> • <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 97</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Federated Farmers of New Zealand</i>	278	<i>Amend</i>	<p>Amend to reflect below wording or similar: "Any discharge of contaminants from an animal waste system, silage storage or a composting process that results in more than minor adverse effects: (i) To a water body; or (ii) To saturated land; or (iii) To the bed of any lake or river, or Regionally Significant Wetland; or (iv) That enters water from land; or (v) That results in ponding that causes or will cause the discharge to enter water is a prohibited activity."</p>	<ul style="list-style-type: none"> • Existing rules in section 12.8 enabled disposal of waste. • Extension of rule to cover silage and composting makes any such discharge prohibited if it fits into (i) to (v), inappropriately captures standard farming activities that may have negligible adverse effect. • Application rate can exceed infiltration rate with minor ponding, without it reaching water. • If effects-based, permitted activity rule should instead be strengthened. • Inclusion of conduit to water means application of effluent over tile drains is prohibited and doesn't allow for careful application and low rate systems that manage the risk. Conduit reference can be deleted as sufficient provision for this already in condition (iv).
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 97</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support</i>		<ul style="list-style-type: none"> • <i>Operation relies on natural streams for continuing viability.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 278 ref. 97</i>		<ul style="list-style-type: none"> • Plan change has huge impact on farming business. • Plan change does not differentiate between intensive farming and extensive pastoral grazing.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 97</i>		No reason given.
<i>Alliance Group Limited</i>	1060	<i>Support submission 278 ref. 97</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 97</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 97</i>		<ul style="list-style-type: none"> • Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use. • Activities should only be prohibited when they have significant adverse environmental effects.
Waitensea Ltd	290	Oppose	Allow discharge of contaminants to water bodies.	<ul style="list-style-type: none"> • Perfect effluent system would still result in N going to groundwater. • If taken to letter of law all dairy farming will stop.
Clydevale Dairy Farms Ltd	297	Amend	<p>That this rule be amended to discretionary activity status with clarification/definition around the various terms used within it.</p> <p>Provision must also be made for emergencies, exceptional circumstances, temporary discharges, or discharges associated with maintenance work.</p>	<ul style="list-style-type: none"> • Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report. • Not justified by any analysis of actual or potential effects. • Rule impractical, not providing for discharges that are temporary or result from maintenance works and exceptional circumstances. • Unclear how rule will be monitored/enforced for minor traces of contaminants from land. • Inconsistency because of provision for discharges subject to Schedule 16. • Uncertain re 'ponding', 'conduit to water' and references to 'water' in different contexts. Define terms and explain in context of environmental effects addressed. • Question how large surface area needs to be before it is ponding. How long must water sit before it becomes a pond? Is there a discharge to water if conduit does not contain water?
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 297 ref. 97</i>		<ul style="list-style-type: none"> • If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects. • Doesn't allow for careful/low rate application that manages risk.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 297 ref. 97</i>		<ul style="list-style-type: none"> • Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification. • Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option. • Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds. • 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.
Greenfield Farming Ltd	298	Amend	That this rule be amended to discretionary activity status with clarification/definition around the various terms used within it.	<ul style="list-style-type: none"> • Prohibited activity removes ability to apply for consent. Not justified by objectives, policies or assessment in S 32 Report. • Not justified by any analysis of actual or potential effects.
Big River Dairy Limited	299			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Provision must also be made for emergencies, exceptional circumstances, temporary discharges, or discharges associated with maintenance work.	<ul style="list-style-type: none"> • Rule impractical, not providing for discharges that are temporary or result from maintenance works and exceptional circumstances. • Unclear how rule will be monitored/enforced for minor traces of contaminants from land. • Inconsistency because of provision for discharges subject to Schedule 16. • Uncertain re 'ponding', 'conduit to water' and references to 'water' in different contexts. Define terms and explain in context of environmental effects addressed. • Question how large surface area needs to be before it is ponding. How long must water sit before it becomes a pond? Is there a discharge to water if conduit does not contain water?
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submissions 298 and 299 ref. 97</i>		<ul style="list-style-type: none"> • <i>If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects.</i> • <i>Doesn't allow for careful/low rate application that manages risk.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submissions 298 and 299 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
William John Pile	301	Oppose	Each area to be treated on its soil type.	<ul style="list-style-type: none"> • Each area must be handled differently because of soil type.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 301 ref. 97</i>		<ul style="list-style-type: none"> • <i>No adequate justification for prohibited activity status</i> • <i>Rule not practical or reasonable and too vague regarding what appropriate mitigation is.</i> • <i>Sediment runoff can occur regardless of land use.</i>
Andrea Clarke	305	Support	Support.	<ul style="list-style-type: none"> • Rule is clear statement that effluent systems need to be managed effectively.
<i>Silver Fern Farms Limited</i>	1070	<i>Oppose submission 305 ref. 97</i>		<ul style="list-style-type: none"> • <i>Oppose submissions seeking to retain prohibited status rules.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
The Director-General of Conservation	306	Support	Retain in full as publicly notified.	<ul style="list-style-type: none"> • Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.
<i>ME Elston</i>	1002	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Provisions should reflect the actual wording in Section 107 of the Act, not the selective interpretation put forward by submitter.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>No evidence from environmental impacts from agricultural activities.</i> • <i>Changes are vague, unclear and open-ended.</i> • <i>No need for further restrictions on discharges.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Would impact on farming operation.</i> • <i>Further submitter is currently undertaking significant measures to address any potential effects on water quality.</i> • <i>Costs of the proposed changes outweigh the benefits.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Oppose</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>

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		<i>submission 306 ref. 97</i>		
<i>Mr RJ Borst</i>	<i>1034</i>	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</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 & Mrs SS Burdon</i>	<i>1040</i>			
<i>Mr TE & Mrs JA Craig</i>	<i>1041</i>			
<i>Mr DJ & Mrs JC Andrew</i>	<i>1042</i>			
<i>Macraes Community Incorporated</i>	<i>1043</i>			
<i>Mr GV & 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 & 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>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i> 	
<i>Clutha District Council</i>	<i>1050</i>			
<i>Central Otago District Council</i>	<i>1051</i>	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Submission seeks wide changes without supporting evidence of environmental impacts from agricultural activities.</i>
<i>Moutere Station Limited</i>	<i>1052</i>			
<i>Hawkdun Station</i>	<i>1053</i>	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Central Otago Wine Growers Association</i>	<i>1054</i>			
<i>TrustPower</i>	<i>1059</i>			
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <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>
<i>Glenshee Station Limited</i>	<i>1062</i>	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>Silver Fern Farms Limited</i>	<i>1070</i>	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Oppose submissions seeking to retain prohibited status rules.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<i>rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> <ul style="list-style-type: none"> • <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>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <i>Activities should only be prohibited when they have significant adverse environmental effects.</i>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 97</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>
Clutha District Council	308	Amend	Rule be amended as follows: - Prohibited activity status changed to discretionary. - Rule made subject to subsequent rules providing for discharges. - "Ponding" to refer to water standing for 72 hours. - Provision for emergencies, exceptional circumstances, temporary discharges, or discharges associated with maintenance work.	<ul style="list-style-type: none"> • Includes double ups and inconsistencies e.g. water • Not clear what a conduit to water is, or its significance. • Ponding must be linked to the environmental effects that are sought to be controlled by the rule. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 97</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 97</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 97</i>		<ul style="list-style-type: none"> • <i>If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects.</i> • <i>Doesn't allow for careful/low rate application that manages risk.</i>
<i>TrustPower</i>	1059	<i>Support submission 308 ref. 97</i>		<ul style="list-style-type: none"> • <i>Prohibited rules should be withdrawn.</i> • <i>Overly restrictive and inconsistent with achieving the purpose of the RMA.</i>
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 308 ref. 97</i>		<ul style="list-style-type: none"> • <i>Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification.</i> • <i>Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option.</i> • <i>Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds.</i> • <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>
Central Otago District Council &	309	Oppose	No decision requested.	<ul style="list-style-type: none"> • <i>Prohibited activity status unjustified and inconsistent with the purpose of the</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Clutha District Council				RMA.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 97</i>		• No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 97</i>		• No reason given.
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 97</i>		<ul style="list-style-type: none"> • Support that changes prevent effects of discharges being assessed on case by case basis. • Agree prohibited status should be removed. • Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable. • Support that reasonable mixing be provided for.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 97</i>		<ul style="list-style-type: none"> • If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects. • Doesn't allow for careful/low rate application that manages risk.
<i>TrustPower</i>	1059	<i>Support submission 309 ref. 97</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 309 ref. 97</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>Silver Fern Farms Limited</i>	1070	<i>Support in part submission 309 ref. 97</i>		<ul style="list-style-type: none"> • Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification. • Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option. • Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds. • 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>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 97</i>		• Seek that the submission be allowed and the Plan Change amended as per the submission.
Glen Dene Limited	310	Amend	Rule be amended as follows: - Prohibited activity status changed to discretionary. - Rule made subject to subsequent rules providing for discharges. - "Ponding" to refer to water standing for 72 hours. - Provision for emergencies, exceptional circumstances, temporary discharges, or discharges associated with maintenance work.	<ul style="list-style-type: none"> • Includes double ups and inconsistencies e.g. water • Not clear what a conduit to water is, or its significance. • Ponding must be linked to the environmental effects that are sought to be controlled by the rule. • Removes all ability for consent to be granted and scope for case-by-case assessment. • Doesn't provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work. • Inconsistent with RMA section 107. • Objectives and policies do not support prohibited activity status. • Section 32 assessment inadequate.
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313			
Greer Farms Partnerships	314			
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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
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. 97</i>		<ul style="list-style-type: none"> • If truly effects based it should be ponding results that are controlled. Ponding does not always result in adverse effects. • Need to be able to consider on case by case basis. • Inconsistent with RMA s107.
<i>Silver Fern Farms Limited</i>	1070	<i>Support in part submissions 310 – 326 326 ref. 97</i>		<ul style="list-style-type: none"> • Support in part intent to withdraw/amend rules to remove the prohibited status and the requirement for clarification. • Prohibited status not justified, no detailed analysis of why prohibited activities most appropriate option. • Rules ambiguous, uncertainty over what discharges are captured by which rules (intended or otherwise), no provision for reasonable mixing or thresholds. • 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>TrustPower</i>	1059	<i>Support submission 323 ref. 97</i>		<ul style="list-style-type: none"> • Prohibited rules should be withdrawn. • Overly restrictive and inconsistent with achieving the purpose of the RMA.
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 97</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 97</i>		<ul style="list-style-type: none"> • 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.

98 Rule 12.C.1.1 - Sediment 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"> • Stringent setting of specified limits for discharges will protect water quality.
<i>Waitaki District Council</i>	1003	<i>Oppose submission 6 ref. 98</i>		<ul style="list-style-type: none"> • Submitter supports rule.
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 6 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 6 ref. 98</i>		<ul style="list-style-type: none"> • Does not allow flexibility for existing farming operations to give effect to the NPS. • Does not allow land managers to implement changes to meet the discharge limits in a manner that meets their own land management regime. • Does take into account local environmental conditions and economic/development consideration.
G R Crutchley	42	Amend	That the further qualifying clause be appended to 12.C.1.1: "For conditions (i) and (ii) to have effect, any breach must be shown to be the result of other than natural causes".	<ul style="list-style-type: none"> • Conditions may not be reasonably applied in some situations. • Turbidity occurs naturally in some catchments well beyond the time thresholds specified, i.e. Kyeburn.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Waitaki District Council</i>	1003	<i>Support in part submission 42 ref. 98</i>		<ul style="list-style-type: none"> • Submitter seeks recognition of natural turbidity.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 42 ref. 98</i>		<ul style="list-style-type: none"> • Limits unrealistic and scientifically impossible to achieve in some situations. • Concern with effect of discharges upstream. • One size fits all approach difficult to implement, enforce and comply with.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 42 ref. 98</i>		<ul style="list-style-type: none"> • Rule as proposed is most appropriate method to achieve objectives and policies. • Rule as proposed best meets the purpose of the RMA.
Graeme Isbister	43	Amend	Allow normal traditional cultivation methods to be used provided they do not cause any breach of major soil runoff to waterways.	<ul style="list-style-type: none"> • To not allow the following of soils by normal cultivation is ridiculous. • Traditional cultivation still has place in agriculture. • What about long term effect of herbicides, pesticides, spraying methods on environment?
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 43 ref. 98</i>		<ul style="list-style-type: none"> • Limits unrealistic and scientifically impossible to achieve in some situations. • Concern with effect of discharges upstream. • One size fits all approach difficult to implement, enforce and comply with.
University of Otago, Department of Zoology	57	Amend	Explain briefly what "sedimentation" means in this context for clarity. Cross referencing to Table 15.1 in Schedule 15 would be sufficient to explain sedimentation to the Plan user.	<ul style="list-style-type: none"> • Reasons within decision requested.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 57 ref. 98</i>		<ul style="list-style-type: none"> • Submitter seeks definition of "sedimentation".
<i>The Director-General of Conservation</i>	1011	<i>Support submission 57 ref. 98</i>		<ul style="list-style-type: none"> • Provides certainty.
<i>Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga</i>	1065	<i>Support submission 57 ref. 98</i>		<ul style="list-style-type: none"> • Ensures contaminants being discharged directly or indirectly are reduced.
Peter Deans & Graham Deans	63	Amend	Amend rule to give more time for water to clear e.g. (a) 10 hrs for 40 turbidity units. (b) 72 hours for 5 turbidity units.	<ul style="list-style-type: none"> • Takes longer for water to clear in high rainfall areas like Catlins. • Natural organic matter and nutrients from native reserve areas.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 63 ref. 98</i>		<ul style="list-style-type: none"> • Submitter seeks recognition of systems having different characteristics.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 63 ref. 98</i>		<ul style="list-style-type: none"> • Limits unrealistic and scientifically impossible to achieve in some situations. • Concern with effect of discharges upstream. • One size fits all approach difficult to implement, enforce and comply with.
Gerald Burgess	65	Amend	One hour to be changed to 72 hours. Twelve hours to be changed [to] 3 days.	<ul style="list-style-type: none"> • High rainfall areas take longer to settle.
<i>Waitaki District Council</i>	1003	<i>Support submission 65 ref. 98</i>		<ul style="list-style-type: none"> • Submitter seeks recognition of natural turbidity.
Barry John Burgess	66	Amend	Need more time to clear water.	<ul style="list-style-type: none"> • It just won't happen.
<i>Waitaki District Council</i>	1003	<i>Support submission 66 ref. 98</i>		<ul style="list-style-type: none"> • Submitter believes rule will not work.
G Evans	67	Amend	Sediment into water should relate to soil type and varied accordingly.	<ul style="list-style-type: none"> • No reason given.
Greg Ramsay & Gae Stott	68	Amend	Amend rule to give more time for water to clear majorly. (a) 10.5 hrs for 40 NTU (b) 73 hrs for 5 NTU.	<ul style="list-style-type: none"> • Takes longer for waterways to clear.
<i>Waitaki District Council</i>	1003	<i>Support</i>		<ul style="list-style-type: none"> • Submitter seeks recognition of systems having different characteristics.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 68 ref. 98</i>		
Hawkdun Idaburn Irrigation Company Ltd	70	Amend	Should all be permitted.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Region wide standards and limits - regional or local conditions vary, so common sense has to be balancing factor.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support in part submission 70 ref. 98</i>		<ul style="list-style-type: none"> • <i>No recognition of local characteristics.</i>
<i>Rayonier New Zealand Limited</i>	<i>1015</i>	<i>Support in part submission 70 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	<i>1016</i>	<i>Support in part submission 70 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Ernslaw One's submission, in relation to infrastructure repair, subject to best practice.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 70 ref. 98</i>		<ul style="list-style-type: none"> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Need provision for reasonable mixing.</i>
<i>City Forests</i>	<i>1071</i>	<i>Support in part submission 70 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
B R Philpott	71	Amend	Permit discharges from; and exempt from; for sediment runoff in relation to natural causes.	<ul style="list-style-type: none"> • Can't control runoff and sediment from roads into drains then to rivers.
Jeff & Alison Thompson	78	Amend	<p>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.</p> <p>Realistic expectations established as to how these can be worked on.</p>	<ul style="list-style-type: none"> • Levels permitted in new rules too low and unrealistic, will have serious impacts on financial viability of farming and wider community. • Drains often contain water from naturally occurring springs which may be naturally higher in some nutrients / contaminants and give higher or inaccurate readings. • 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.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 78 ref. 98</i>		<ul style="list-style-type: none"> • <i>Measures not realistic and don't account for differing regions and systems.</i> • <i>Farmers may breach limits despite taking precautions.</i>
Roger Fox	82	Amend	[Rule 12.C.1.1 (ii) (a)] more than five hours. [Rule 12.C.1.1 (ii) (b)] more than 36 hours.	<ul style="list-style-type: none"> • With vegetation cover, water will still be carrying sediment at lesser time.
Alan L Wilson	88	Amend	Would like the standard reduced to a level we can all achieve.	<ul style="list-style-type: none"> • Support high water quality in principle, but standard too high, may be higher than natural state without stock, impossible to achieve.
Ross A & Alexa Wallace	101	Amend	12.C.1.1(ii)(b) Change twelve to twenty four hours.	<ul style="list-style-type: none"> • Creeks can take some time to settle after significant rainfall. • Allow wetlands and sediment traps to operate under winter conditions.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support in part submission 101 ref. 98</i>		<ul style="list-style-type: none"> • <i>No recognition of local characteristics.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 101 ref. 98</i>		<ul style="list-style-type: none"> • <i>Enables more achievable timeframes and will allow for wetlands and similar systems to operate.</i> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
Jane Young	124	Amend	Suggest incremental introduction of quantitative turbidity limits and	<ul style="list-style-type: none"> • Lead-in times too long.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			a shorter overall time frame. Times after cessation of rainfall within which sediment levels must be reduced may not be realistic in all situations.	<ul style="list-style-type: none"> Standards often qualitative not quantitative.
Grant Bradfield	131	Oppose	This section should be scrapped and replaced with the promotion of best practice.	<ul style="list-style-type: none"> Sedimentation a natural process. Water can run dirty for days after heavy rain. Farmers have limited ability to combat runoff.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 131 ref. 98</i>		<ul style="list-style-type: none"> Submitter seeks recognition of natural turbidity.
Andrew Jackson	132	Amend	1 hr increased to 12 hrs, and 12 hrs increased to 36 hrs.	<ul style="list-style-type: none"> Limits set too high, which would cost a lot to control, if at all. Would have to fence all waterways, costing \$326,000 in total + stock water system. Even with fencing, could still be water quality problems in tile drains.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 132 ref. 98</i>		<ul style="list-style-type: none"> Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. Concern with workability. Needs to be achievable and cost effective.
The Cow Farm Limited	133	Amend	Amend the rule to adequately allow it to be interpreted and applied by people who undertake the activities. Clarify the discrepancies and apparent conflicts with Rule 12.1.0.4 [12.C.0.4].	<ul style="list-style-type: none"> Unclear, does not specify how much time can elapse between discharge and rainfall before sedimentation is not attributable to a specific activity. Difficult to monitor, not easily understood by general public. Doesn't allow for significant natural rainfall events that cause significant natural turbidity. Doesn't allow for any natural variation within rivers. Unclear how it relates to Rule 12.C.0.4, which makes sediment discharges a prohibited activity in some circumstances.
<i>Waitaki District Council</i>	1003	<i>Support submission 133 ref. 98</i>		<ul style="list-style-type: none"> Seeks clarification of rule.
<i>Otago Water Resource Users Group</i>	1056	<i>Support in part submission 133 ref. 98</i>		<ul style="list-style-type: none"> Modify the rule to accommodate a longer run-off period when this occurs naturally.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 133 ref. 98</i>		<ul style="list-style-type: none"> Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. Concern with workability. Needs to be achievable and cost effective.
Waitaki District Council	138	Did not specify	Clarify how (i) will be measured and what triggers may change the activity status.	<ul style="list-style-type: none"> Unclear how parameters will be measured or triggered. Does not allow for hydrological system delays.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 138 ref. 98</i>		<ul style="list-style-type: none"> Measurement of "sedimentation" should be clarified. Supports an overall clarification of the rule structure and how each activity status within rules in Section 12C relates to one another.
<i>Dunedin City Council</i>	1025	<i>Support submission 138 ref. 98</i>		<ul style="list-style-type: none"> Consistent with DCC position. Concern about economic and social impact. Control measures of PC6A go far beyond those required to achieve the stated environmental results.
<i>Otago Fish and Game Council</i>	1027	<i>Oppose submission 138 ref. 98</i>		<ul style="list-style-type: none"> Making the rule more complex may limit its effectiveness.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 138 ref. 98</i>		<ul style="list-style-type: none"> Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. Concern with workability.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Needs to be achievable and cost effective.
Alliance Group Limited	1060	Support submission 138 ref. 98		<ul style="list-style-type: none"> • 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.
The NZ Transport Agency	1073	Support submission 138 ref. 98		<ul style="list-style-type: none"> • Areas of concern or support are consistent with those expressed by the NZTA. • Control measures proposed in plan change go beyond those required to achieve the stated environmental results. • Seek the submission is allowed.
Clutha Agricultural Development Board	139	Amend	<p>Until research can make a fair and reasonable conclusion, use the concept 'when the river returns to its average or normal flow' rather than a time bound period.</p> <p>The term "nephelometric turbidity" needs definition.</p>	<ul style="list-style-type: none"> • It takes considerably longer than 12 hours to return to normal flows after flooding or after 2-3 days of rain on saturated soils. • More research is needed to show that a 12 hour period is fair and reasonable.
The Director-General of Conservation	1011	Support submission 139 ref. 98		<ul style="list-style-type: none"> • Terminology needs defining in lay person terms.
Contact Energy Limited	1013	Support submission 139 ref. 98		<ul style="list-style-type: none"> • Reasons stated in the submission.
Rayonier New Zealand Limited	1015	Support in part submission 139 ref. 98		<ul style="list-style-type: none"> • Partly consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support in part submission 139 ref. 98		<ul style="list-style-type: none"> • Partly consistent with Ernslaw One's submission.
Horticulture New Zealand	1032	Support submission 139 ref. 98		<ul style="list-style-type: none"> • Use of river flow trigger than time is more effects based.
Federated Farmers of New Zealand	1057	Support submission 139 ref. 98		<ul style="list-style-type: none"> • More research needed to show 12hr is reasonable. • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
Alliance Group Limited	1060	Support submission 139 ref. 98		<ul style="list-style-type: none"> • 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.
City Forests	1071	Support in part submission 139 ref. 98		<ul style="list-style-type: none"> • Partly consistent with City Forest's submission.
Eloise Neeley	141	Amend	Support the permitted activity rule with longer lead in times.	<ul style="list-style-type: none"> • Longer lead in time needed to work through appropriate sediment loss mitigation for winter crops.
M L & P J Lord Family Trust	143	Amend	<p>Review limits in terms of whether they are achievable and make full assessment against the economic impacts of the limits.</p> <p>Amend the rule to ensure that winter crops planted at the moment with be compliant with the plan.</p> <p>Provide guidance on what is an adequate mitigation measure against sediment loss.</p>	<ul style="list-style-type: none"> • Concerned who determines what is a suitable sediment control measure. • How do farmers know they comply with the rule? • Larger question of water quality has not been put side by side with the cost of implementing proposed standards.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Adopted rule with amendments.	
<i>Albert McTainsh</i>	1004	<i>Support submission 143 ref. 98</i>		<ul style="list-style-type: none"> • <i>Practical alternatives & more workable rules offered.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 143 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
New Zealand Pork Industry Board	145	Support	Retain Rule 12C.1.1 (ii).	<ul style="list-style-type: none"> • <i>Transition period should be retained.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support in part submission 145 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support in part submission 145 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Ernslaw One's submission.</i>
<i>City Forests</i>	1071	<i>Support in part submission 145 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with City Forest's submission.</i>
Dairy NZ Limited	146	Amend	<p>Change the rule to remove the uncertainty and conflict between the current clauses, and to replace the current numerical standards with standards that are based on both an appropriate receiving water standard and an assessment of the achievability of specific discharge standards.</p> <p>Rationalise the number of permitted activity rules relating to stormwater discharges.</p>	<ul style="list-style-type: none"> • <i>Term "sedimentation" not defined.</i> • <i>Not clear if intended (i) and (ii) to operate concurrently from 31 March 2017 i.e. having narrative uncertain standard alongside numerical standards.</i> • <i>Literally interpreted, no discharge is permitted.</i> • <i>No technical analysis justifying numerical standards.</i> • <i>Conflicts with Rule 12.B.1.8 which provides for reasonable mixing.</i>
<i>Waitaki District Council</i>	1003	<i>Support in part submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <i>Submitter seeks definition of "sedimentation" and general clarification of rule.</i>
<i>Contact Energy Limited</i>	1013	<i>Support submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <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>City Forests</i>	1071	<i>Support submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms</i>	1074	<i>Support in part submission 146</i>		<ul style="list-style-type: none"> • <i>Need for provision in the transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Partnership</i>		<i>ref. 98</i>		<i>standards.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 98</i>		<ul style="list-style-type: none"> • <i>Oppose any aspects of the submission that are contrary to the further submitter's primary submission.</i>
Ermslaw One Ltd	149	Amend	<p>Review and amend the rule in consultation with the plantation forestry sector to address the concerns expressed in this submission or otherwise delete this rule.</p> <p>Exclude snowmelt events from the rule due to the impracticality of creating a certain and enforceable rule.</p> <p>Build rules with both Optical Clarity (Black Disc) measurements and NTUs where Optical Clarity measurements are equivalent to the 5 and 40 NTU scores for Otago.</p> <p>Change the one and 12 hours timeframes in all Rules to 6 and 24 hours respectively.</p> <p>Develop statistically robust relationships between turbidity (measured in NTUs) and optical clarity (measured as horizontal distance via a black disc device).</p> <p>Establish whether the relationships vary between runoff from pasture versus tussock or forest (be it native or planted), given that natural organic carbon in tannins may vary the colour of each.</p> <p>Carry out a detailed investigation into the turbidity limits commonly occurring in the Otago Region and set turbidity threshold limits accordingly.</p>	<ul style="list-style-type: none"> • Unduly stringent, needs to provide a reasonable period following cessation of rain to allow stormwater / snowmelt flow off land. • Doesn't provide for any sedimentation threshold limit. • Oppose change from "reasonable mixing" to "NTU because no evidence plantation forestry is adversely affecting water quality, so shouldn't be more stringent than current rules in Otago and elsewhere. • Black disc method more accurate, relevant, cheaper. • Proposed limits arbitrary values, not supported by robust scientific data. • Evidence natural land processes exceed 40 and 5 NTU limits. • Limits fail to take into account variable geology, rainfall intensity and duration, soil types, soil moisture content and catchment topography, snowmelt, and the quality of water received onto the site. • Practical difficulties with measuring compliance within the specified 1 hr timeframe; 6 hrs more practicable. • "Time since rain" construct creates great uncertainty.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 149 ref. 98</i>		<ul style="list-style-type: none"> • <i>Framework must be based on realistic measures and must provide greater certainty.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 149 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 149 ref. 98</i>		<ul style="list-style-type: none"> • <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>
John Latta	162	Amend	Increase 1 hour to 6 hours. Increase 12 hours to 72 hours.	<ul style="list-style-type: none"> • After heavy rain, on saturated soils, water more than one hour to exit site, and longer to clear naturally than twelve hours, even when exiting native bushland. • With positive change to the water plan, stream quality in the Catlins will not be compromised.
Matuanui Ltd	163	Oppose	<p>Delete rule and investigate further the following issues:</p> <ul style="list-style-type: none"> - Rainfall as a measure is unenforceable and vague. - No sedimentation is impossible to achieve unless the sediment content of the water is zero. - The science justification for 40 & 5 NTU and their achievability is not clear. - Rule isn't effects based. - Turbidity as a measure includes organic matter, so mown grass and autumn leaves are included in it. 	<ul style="list-style-type: none"> • In Owaka, high rainfall means creeks run high for days making it unrealistic / inaccurate to measure water 12 hours post rainfall. • No clear science backing up limits, not covered in section 32 report. Unclear if achievable. • Sedimentation occurs naturally without negative effect on creeks. • Achieving 5 NTU in 12 hours impossible, being set up to fail. • Prohibitions (12.C.0.1 & 12.C.0.2) cover rule, therefore this rule redundant. • Suspended sediment a better measure than turbidity.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Waitaki District Council</i>	1003	<i>Support in part submission 163 ref. 98</i>		<ul style="list-style-type: none"> • <i>Submitter seeks recognition of natural turbidity and clarification of rule.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 163 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
James Watt	167	Amend	12.C.1.1 (ii) 24 hours after rainfall on site waterbody leaving your land should not exceed 5 NTU.	<ul style="list-style-type: none"> • Practicality of measuring compliance. • Allows time for sediment traps, wetlands and other measures to function.
Lovells Creek Farm Ltd	189	Amend	(a) After 12 hours after rain ceases on the site discharge shall not exceed water clarity of 40 n . . . (b) More than 72 hours after rain ceases . . .	<ul style="list-style-type: none"> • Sedimentation takes longer to settle.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 189 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
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"> • Have taken a number of water tests on farm. • Limits should be set closer to what we can achieve without compromising production.
Grant Ludemann	191	Amend	(a) 2 hrs. (b) 24 hrs.	<ul style="list-style-type: none"> • Drainage takes longer after prolonged easterly rains in North Otago, compared to short sharp rainfall events.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 191 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
Peter McNab	192	Support	Support, but measurement in (ii) (a) and (b) are based on what?	<ul style="list-style-type: none"> • Effects from rain can discolour waterway for up to 2 days.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketakeraki, Hokonui Runanga	197	Amend	Rule 12.C.1.1 be deleted OR Rule 12.C.1.1 should be redrafted to link what is occurring on-site during rainfall to the outcomes sought within the freshwater body. The redrafted rule should be clear, enforceable and enable people to determine whether they comply with the rule.	<ul style="list-style-type: none"> • Generally opposes sediment discharge to water, accepts this will occur during rainfall. • Rule not clear it applies only during rainfall. • (i) lacks certainty, 'sedimentation' not defined, difficult to determine compliance. • (ii) difficult to know if NTU complied with, and to determine where, physically, discharge is "about to enter water". • Rule effectively permits mixing zone for up to 12 hrs, inconsistent with Policy 7.D.1. • Significant concerns over implementation and enforcement, continual sampling at multiple locations potentially required.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 197 ref. 98</i>		<ul style="list-style-type: none"> • <i>Submitter seeks definition of "sedimentation".</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 197 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 197 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose in part submission 197 ref. 98</i>		<ul style="list-style-type: none"> • <i>Agrees that rule could be clearer.</i> • <i>Reference to "freshwater" is opposed as the proposed plan change should protect public water bodies only.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 197</i>		<ul style="list-style-type: none"> • <i>Agree with clarity and enforceability concerns. Confusion for plan users as to how to comply and with reference to specific Overseer model.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 98</i>		<ul style="list-style-type: none"> • <i>Strongly oppose suggested reduction in transition times.</i>
<i>Glenshee Station Limited</i>	1062	<i>Oppose submission 197 ref. 98</i>		<ul style="list-style-type: none"> • <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>City Forests</i>	1071	<i>Support submission 197 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 197 ref. 98</i>		<ul style="list-style-type: none"> • <i>Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).</i>
Ian Bryant	199	Oppose	Oppose.	<ul style="list-style-type: none"> • Open to interpretation - is sediment naturally occurring or man made? • Queries responsibility for sediment coming off rural gravel roads, and measurement of heavy metal in runoff from highways. • 12 hour after rain rule is lenient in fast runoff areas, and much harder on slow runoff areas.
<i>Waitaki District Council</i>	1003	<i>Support submission 199 ref. 98</i>		<ul style="list-style-type: none"> • <i>Rule unclear.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 199 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
NZ Transport Agency	203	Amend	Amend Rule 12.C.1.1 to provide for a mixing zone and a turbidity measurement method that can be visually assessed on-site.	<ul style="list-style-type: none"> • Measurement method not defined in the Glossary. • A mixing zone with a visual assessment method should be provided.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support in part submission 203 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support in part submission 203 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Ernslaw One's submission.</i>
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 98</i>		<ul style="list-style-type: none"> • <i>No reasons given.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 203 ref. 98</i>		<ul style="list-style-type: none"> • <i>One size fits all approach difficult to implement, enforce and comply with.</i> • <i>Ensure reasonable mixing zones included.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 98</i>		<ul style="list-style-type: none"> • <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>City Forests</i>	1071	<i>Support in part submission 203 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with City Forest's submission.</i>
Trustpower Limited	206	Amend	Amend the proposed rule as follows: "Excluding discharges captured by Rule 12.C.1.6, the discharge of sediment to water is a permitted activity, providing..."	<ul style="list-style-type: none"> • Clarity on how rules work together • Rule should not apply in addition to meeting Rule 12.1.2.6 for dam discharges.
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 98</i>		<ul style="list-style-type: none"> • <i>Reasons stated in the submission.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 206 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 206 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with <i>Ernslaw One's</i> submission.
<i>New Zealand Wind Energy Association</i>	1030	<i>Support in part submission 206 ref. 98</i>		<ul style="list-style-type: none"> • Supports submitter's request to amend the list of permitted activities. • List of excluded activities should be extended to include any renewable electricity generation activity.
<i>City Forests</i>	1071	<i>Support submission 206 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with <i>City Forest's</i> submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 206 ref. 98</i>		<ul style="list-style-type: none"> • Inconsistent with relief sought by further submitter.
M C Holland Farming Ltd	207	Amend	That Rule 12.C.1.1 is deleted or rewritten to be more practical.	<ul style="list-style-type: none"> • Concerned about locations for measuring compliance. • Laboratory tests take 2 days to process, impossible to determine compliance within 1 and 12 hours of rain ceasing. • Can discharge sediment as permitted activity but prohibited under 12.C.0.2.
<i>Waitaki District Council</i>	1003	<i>Support submission 207 ref. 98</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 207 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
Blakely Pacific Limited	209	Amend	<p>Insert a controlled activity standard for activities that are non-compliant.</p> <p>Review and amend the rule in consultation with the plantation forestry sector to address the concerns expressed in this submission or otherwise delete this rule.</p>	<ul style="list-style-type: none"> • Needs to provide for a reasonable period following cessation of rain to allow stormwater / snowmelt to flow off the land. • Doesn't provide for any sedimentation threshold limit. • Practical difficulties with measuring compliance within the specified one hour timeframe; six hours would be far more practicable. • Thresholds are inappropriate and unnecessary. • No justification for more stringent approach for forestry. • Doesn't take into account rainfall intensity/duration, soil types, snow melt, receiving water quality.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 209 ref. 98</i>		<ul style="list-style-type: none"> • Submitter seeks recognition of systems having different characteristics.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 209 ref. 98</i>		<ul style="list-style-type: none"> • More research needed to show 12hr is reasonable. • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 209 ref. 98</i>		<ul style="list-style-type: none"> • Inconsistent with relief sought by further submitter.
Dunedin City Council	211	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Rule irrelevant as discharge prohibited under 12.C.0.2.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 211 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with <i>Rayonier's</i> submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 211 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with <i>Ernslaw One's</i> submission.
<i>Strath Taieri Community Board</i>	1029	<i>Support</i>		<ul style="list-style-type: none"> • No reason given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>submission 211 ref. 98</i>		
<i>Clutha District Council</i>	1050	<i>Support submission 211 ref. 98</i>		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges. • Prohibitions are overly restrictive and have unintended application due to Schedule 16 limits.
<i>Central Otago District Council</i>	1051			
<i>Central Otago Wine Growers Association</i>	1054			
<i>Alliance Group Limited</i>	1060	<i>Support submission 211 ref. 98</i>		<ul style="list-style-type: none"> • 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>City Forests</i>	1071	<i>Support submission 211 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 211 ref. 98</i>		<ul style="list-style-type: none"> • 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.
T A Whiteside & Co Ltd	212	Amend	Amend rule to provide more certainty on what is considered adequate mitigation and to ensure that autumn sown cropping can continue in Otago.	<ul style="list-style-type: none"> • Concern about restrictions on autumn cultivation.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 212 ref. 98</i>		<ul style="list-style-type: none"> • Rules not practical. • Rule too vague regarding what appropriate mitigation is. • Sediment runoff can occur regardless of land use.
Alan Grant Macgregor	215	Oppose	Total review of rule.	<ul style="list-style-type: none"> • Limitations around quantification and measurement limits set of 5 and 40 NTU.
A P S Heckler Family Trust	218	Oppose	Oppose.	<ul style="list-style-type: none"> • Impossible to monitor compliance without lab testing, how do we know if we are complying?. • Mitigation measures (e.g. Weir system, or riparian strips) are either costly or impractical due to topography. • No recognition of possibility of contaminants from neighbouring land entering water courses. • Fails to define where point of discharge into water is. • Fails to take into account distance and time taken before discharge enters water.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 218 ref. 98</i>		<ul style="list-style-type: none"> • Not clear on how it will be measured.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 218 ref. 98</i>		<ul style="list-style-type: none"> • More research needed to show 12hr is reasonable. • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
Waverley Downs Ltd	220	Amend	Amend rule to provide more certainty on what is considered adequate mitigation and to ensure that cropping can continue in Otago.	<ul style="list-style-type: none"> • Crop establishment requires soil disturbance. • Impossible to comply with given topography.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 220 ref. 98</i>		<ul style="list-style-type: none"> • Rules not practical. • Rule too vague regarding what appropriate mitigation is. • Sediment runoff can occur regardless of land use.
Fulton Hogan Limited	222	Amend	Change the rule to remove uncertainty and conflict with specific stormwater rules in section 12.B and to replace the current numerical standards with ones that are based on an appropriate receiving water standard e.g:	<ul style="list-style-type: none"> • Term "does not cause sedimentation" taken literally may not allow discharge of any sediment therefore effectively removing the permitted activity rule. • Conflict between stormwater rules in section 12.B and this rule. Likely need to comply with both sets of rules.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			<p>"Where rainfall exceeds 30 mm in a 24 hour period, a discharge will not increase the suspended solids concentration of a water body by more than 50 g/m³".</p> <p>Define the word "sedimentation"</p> <p>The water standard adopted should have undergone a thorough assessment of the likely hood that the standard could be achieved. Use TSS as a measure for testing the discharge of sediment.</p>	<ul style="list-style-type: none"> • Cessation of rain as a determinant for applying limits has potential for significant debate. • Highly unlikely that after 12 hours, any discharge of sediment will meet 5 NTU. • Glacial water with turbidity naturally at 8-9 NTU will be non-compliant. • Use of NTU is outdated and inaccurate.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 222 ref. 98</i>		<ul style="list-style-type: none"> • <i>Rule unclear and conflicting with other rules.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support in part submission 222 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 222 ref. 98</i>		<ul style="list-style-type: none"> • <i>Generally consistent with Ernslaw One's submission.</i> • <i>Prefers Optical Clarity via Black Disc measurement over TSS.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 222 ref. 98</i>		<ul style="list-style-type: none"> • <i>More research needed to show time periods are reasonable.</i> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
<i>City Forests</i>	1071	<i>Support in part submission 222 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with City Forest's submission.</i>
Holcim (New Zealand) Limited	224	Amend	<p>Change the rule to remove uncertainty and conflict with specific stormwater rules in section 12.B and to replace the current numerical standards with ones that are based on an appropriate receiving water standard e.g:</p> <p>"Where rainfall exceeds 30 mm in a 24 hour period, a discharge will not increase the suspended solids concentration of a water body by more than 50 g/m³".</p> <p>Define the word "sedimentation"</p> <p>The water standard adopted should have undergone a thorough assessment of the likely hood that the standard could be achieved.</p> <p>Use TSS as a measure for testing the discharge of sediment.</p>	<ul style="list-style-type: none"> • Term "does not cause sedimentation" taken literally may not allow discharge of any sediment therefore effectively removing the permitted activity rule. • Conflict between stormwater rules in section 12.B and this rule. Likely that would need to comply with both sets of rules. • Cessation of rain as a determinant for applying limits has potential for significant debate. • Highly unlikely that after 12 hours, any discharge of sediment will meet 5 NTU. • Glacial water with turbidity naturally at 8-9 NTU will be non-compliant. • Use of NTU is outdated and inaccurate.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 224 ref. 98</i>		<ul style="list-style-type: none"> • <i>Rule unclear and conflicting with other rules.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support in part submission 224 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 224 ref. 98</i>		<ul style="list-style-type: none"> • <i>Generally consistent with Ernslaw One's submission.</i> • <i>Prefers Optical Clarity via Black Disc measurement over TSS.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 224</i>		<ul style="list-style-type: none"> • <i>More research needed to show time periods are reasonable.</i> • <i>Doesn't allow for natural variation between rivers or weather events that</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 98</i>		<i>cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
<i>City Forests</i>	<i>1071</i>	<i>Support in part submission 224 ref. 98</i>		• <i>Partly consistent with City Forest's submission.</i>
John Newlands Farming Company	228	Amend	Amend to make allowances for water running onto properties from catchments outside of a property owner's control.	• Property has many waterways that only run after significant rainfall and remain so for days. • Concerned we will be penalised for changes to water quality outside of our control.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 228 ref. 98</i>		• <i>Rules not practical.</i> • <i>Rule too vague regarding what appropriate mitigation is.</i> • <i>Sediment runoff can occur regardless of land use, unfair to hold landowner accountable when discharge occurs beyond property.</i>
<i>Kawarau Station Limited</i>	<i>232</i>	<i>Amend</i>	<i>Amend to define sedimentation.</i>	• <i>What is sedimentation?</i>
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support submission 232 ref. 98</i>		• <i>Submitter seeks definition of "sedimentation".</i>
Michael O'Connor	234	Oppose	Delete 12.C.1.1 (i)(ii)(a)(b).	• Rain can make runoff last for days.
C C & G A Raughan	236	Oppose	Delete rule and investigate lots more.	• What is rainfall? • No sedimentation is impossible to achieve. • Achieving 5 NTU in 12 hrs seems impossible.
David Blair	237	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	• Consider carrying capacity for sensitive areas. • Consider destocking non-performing farmers. • Consider effect of abstraction on concentrating pollutants.
Fonterra Co-operative Group Limited	241	Amend	Change the rule to remove the uncertainty and conflict between the current clauses, and to replace the current numerical standards with standards that are based on both an appropriate receiving water standard and an assessment of the achievability of specific discharge standards. Rationalise the number of permitted activity rules relating to stormwater discharges.	• Term "sedimentation" not defined. • Not clear if intended (i) and (ii) to operate concurrently from 31 March 2017 i.e. having narrative uncertain standard alongside numerical standards. • Literally interpreted, no discharge is permitted. • No technical analysis justifying numerical standards. • Conflicts with Rule 12.B.1.8 which provides for reasonable mixing.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support in part submission 241 ref. 98</i>		• <i>Submitter seeks definition of "sedimentation".</i>
<i>Rayonier New Zealand Limited</i>	<i>1015</i>	<i>Support submission 241 ref. 98</i>		• <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	<i>1016</i>	<i>Support submission 241 ref. 98</i>		• <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 241 ref. 98</i>		• <i>More research needed to show time periods are reasonable.</i> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
<i>Alliance Group Limited</i>	<i>1060</i>	<i>Support submission 241 ref. 98</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>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>City Forests</i>	1071	<i>Support submission 241 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with relief sought by further submitter.
D J & N A McLaren	244	Amend	Amend rule to permit discharge of sediment to water where property is affected by the sediment carrying floodwater overflow and / or ponding following a flood event.	<ul style="list-style-type: none"> • Property becomes main ponding area for Puerua flood waters which take up to 3 days to clear. • Unfair and unworkable to be responsible for sediment deposited by flood waters.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 244 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
Viewmont Limited	247	Oppose	Total review of Rule 12.C.1.1.	<ul style="list-style-type: none"> • Limitations around the quantification and measurement of the water clarity limits set of 5 & 40 NTU. • Would require significant investment in fencing and riparian planting. • Measurement of limits difficult suggesting they are unresearched or verified.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 247 ref. 98</i>		<ul style="list-style-type: none"> • Not clear how sedimentation measured.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 247 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
Sandy Bay Ltd	249	Oppose	Delete rule and investigate further the following issues: - Rainfall as a measure is unenforceable and vague. - No sedimentation is impossible to achieve unless the sediment content of the water is zero.	<ul style="list-style-type: none"> • What is 'rain' and who decides? • Sedimentation occurs naturally without negative effect on creeks. • Levels so low they are unattainable after heavy rain events. Have personally observed large differences in time taken for creeks to clear after rain.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 249 ref. 98</i>		<ul style="list-style-type: none"> • Submitter seeks recognition of natural turbidity and clarification of rule.
<i>Meridian Energy Limited</i>	1014	<i>Support submission 249 ref. 98</i>		<ul style="list-style-type: none"> • Rule should be deleted and redrafted following a robust Section 32 report that identifies the natural variability in water quality throughout the region.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 249 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
Waihemo Water Catchment Society Inc	250	Oppose	Oppose.	<ul style="list-style-type: none"> • Rule is not taking into account source of water being tested. • Insufficient time allowed for researching these planned changes and proposals.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 250 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 250 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 250 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> • Needs to be achievable and cost effective. • Consistent with City Forest's submission.
City Forests	1071	Support submission 250 ref. 98		
Meridian Energy Limited	251	Oppose	<p>Provide for small scale or minor operational discharges appropriately.</p> <p>Withdraw proposed Permitted Rule 12.C.1.1 relating to the discharge of sediment to water from the Plan Change, or rework it so that has regard to natural variability and the benefits to be derived from the use of the water resource.</p>	<ul style="list-style-type: none"> • Hard for discharges to meet rule as after cessation of rainfall monitoring will reflect cumulative runoff during flood-flow conditions, rather than runoff from a single site. • No justification for how values established. No scientific report or economic assessment has been provided. • Concerned one set of numbers set across entire region. Doesn't take into account natural variability or beneficial uses of water. • Limits need to be based on "the best available information and scientific and socio-economic knowledge" (NPSFW) and be consistent with RMA Part 2.
Waitaki District Council	1003	Support in part submission 251 ref. 98		<ul style="list-style-type: none"> • Submitter seeks recognition of systems having different characteristics.
Contact Energy Limited	1013	Support submission 251 ref. 98		<ul style="list-style-type: none"> • Reasons stated in the submission.
Rayonier New Zealand Limited	1015	Support submission 251 ref. 98		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support submission 251 ref. 98		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
Horticulture New Zealand	1032	Support in part submission 251 ref. 98		<ul style="list-style-type: none"> • Recognition of natural variability is important.
Federated Farmers of New Zealand	1057	Support submission 251 ref. 98		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
Alliance Group Limited	1060	Support submission 251 ref. 98		<ul style="list-style-type: none"> • 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.
City Forests	1071	Support submission 251 ref. 98		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
Rayonier New Zealand Ltd	256	Amend	<p>Review and amend the rule in consultation with the plantation forestry sector to address the concerns addressed or delete this rule.</p>	<ul style="list-style-type: none"> • Acknowledge intent of rule. • Unduly stringent. Should be reworded to provide for reasonable period following rainfall. • Duration of period should reflect catchment size/shape, soil types, rainfall intensity. • Requiring zero sedimentation following rainfall is unreasonable and unjustified. • The change from "reasonable mixing" to NTU opposed because: <ul style="list-style-type: none"> - No evidence that forestry non-compliant with operative plan or activities causing significant effects. - Visual clarity should be measured by black disc, easier, more accurate and relevant. • Thresholds of 5 NTU and 40 NTU inappropriate and unnecessary because:

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> - Not supported by robust scientific data, no justification for more stringent approach than operative plan. - Practical difficulties with measuring compliance within 1 hour timeframe. - No account for geological variability, snow melt, quality of water received on site. - Rainfall/run-off principles affects achievability. - Excessively high compared to similar rules elsewhere in NZ. - Problematic to monitor and enforce.
<i>Waitaki District Council</i>	<i>1003</i>	<i>Support in part submission 256 ref. 98</i>		<ul style="list-style-type: none"> • <i>Submitter seeks recognition of systems having different characteristics.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 256 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
Waitaki Irrigators Collective Limited	257	Amend	<p>Allow longer times from the cessation of rain for the measurement of turbidity.</p> <p>Change rain to "precipitation" to take into account snow, hail and so on or amend the rule so that discharges are measured during median flows, as originally proposed.</p> <p>A better definition of water should be provided, so that it clearly does not include confined water such as a puddle.</p>	<ul style="list-style-type: none"> • Precipitation event is ill-defined and lead to unfair results. • 12 hours not realistic timeframe, water can take days to move through system.
<i>Rayonier New Zealand Limited</i>	<i>1015</i>	<i>Support submission 257 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	<i>1016</i>	<i>Support submission 257 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support in part submission 257 ref. 98</i>		<ul style="list-style-type: none"> • <i>More technical robustness needed (longer timeframes, appropriateness of measurements).</i> • <i>Change to terminology will aid ease of use.</i>
<i>City Forests</i>	<i>1071</i>	<i>Support submission 257 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
North Otago Irrigation Company	260	Amend	<p>That rule 12.C.1.1 is amended to reflect median environmental conditions and a more achievable level of water clarity.</p> <p>That additional wording is included to ensure farmers are not held accountable for natural events, such as mass movements or in-stream erosion processes.</p> <p>Requests ORC provides a visual aid to help farmers understand what 40 NTU and 5NTU (or any other proposed turbidity limit) looks like.</p>	<ul style="list-style-type: none"> • 5NTU very clear, many drains/watercourses exceed this through natural processes. • 12 hour interval inappropriate - rain could move off hills for several days. • Definition of "rain" unworkable - too open to interpretation. Turbidity should be measured during 'median' flow conditions (in line with intent of rule). • Farmers should not be responsible natural contributions to turbidity - erosion event or natural scour processes.
<i>Rayonier New Zealand Limited</i>	<i>1015</i>	<i>Support submission 260 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	<i>1016</i>	<i>Support submission 260</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>

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		<i>ref. 98</i>		
<i>John Webster</i>	1063	<i>Support submission 260 ref. 98</i>		<ul style="list-style-type: none"> • <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. 98</i>		<ul style="list-style-type: none"> • <i>Support the NOIC submission in full.</i>
<i>City Forests</i>	1071	<i>Support submission 260 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Colin Scurr	268	Amend	<p>Rule be amended so it is easy to determine compliance and the standard applying after discharge with provision made for reasonable mixing.</p> <p>The relationship with Rule 12.1.0.4 needs to be clarified.</p>	<ul style="list-style-type: none"> • Concern about practicality of rule. How is 'cessation' of rainfall determined. • Concern about practicality of monitoring on a day-to-day basis. • Environmental significance of thresholds is unclear. • Does not provide for reasonable mixing. • Measuring turbidity of non-point discharge, prior to discharge is impossible. • Unclear how rule relates to Rule 12.1.0.4.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 268 ref. 98</i>		<ul style="list-style-type: none"> • <i>Rule unclear.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 98</i>		<ul style="list-style-type: none"> • <i>Limits unrealistic and scientifically impossible to achieve in some situations.</i> • <i>Concern with effect of discharges upstream.</i> • <i>One size fits all approach difficult to implement, enforce and comply with.</i>
Horticulture New Zealand	269	Amend	<p>Amend Rule 12.C.1.1 as follows:</p> <p>"The discharge of sediment to water from a permitted activity providing:"</p> <p>Add "or" at the end of point i) and ii)</p> <p>"iii) where cultivation of production land is undertaken industry best management practices for sediment control are installed prior to cultivation."</p>	<ul style="list-style-type: none"> • Industry best management practices are appropriate permitted activity standards. • Providing for sediment control measures is a more proactive industry approach than requiring compliance with turbidity standard.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 269 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 269 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with Ernslaw One's submission.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 98</i>		<ul style="list-style-type: none"> • <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>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 98</i>		<ul style="list-style-type: none"> • <i>Measurement process to establish N level/ha unworkable.</i> • <i>Landuse management not the ORC's role.</i> • <i>Cost to implement the plan change will be huge.</i> • <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>
<i>City Forests</i>	1071	<i>Support submission 269 ref. 98</i>		<ul style="list-style-type: none"> • <i>Consistent with City Forest's submission.</i>
Forest and Bird	271	Amend	<p>Amend as follows:</p> <p>"The temporary discharge of sediment to water is a permitted activity, providing:</p> <p>(i) After the cessation of rainfall on the site, the discharge does not</p>	<ul style="list-style-type: none"> • (i) contrary to RMA S107(1). • Helpful to clarify provision applies to temporary discharges only.

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			cause sedimentation either or all of the following effects: (a) sedimentation (b) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials (c) any conspicuous change in the colour or visual clarity (d) any emission of objectionable odour (e) the rendering of fresh water unsuitable for consumption by farm animals (f) Any significant adverse effects on aquatic life."	
<i>The Director-General of Conservation</i>	1011	<i>Support submission 271 ref. 98</i>		• <i>Linking the Rule to RMA s107 provides clarity.</i>
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 98</i>		• <i>Not all waterways need to be enhanced.</i> • <i>Background data required before any agricultural activities are restricted.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support in part submission 271 ref. 98</i>		• <i>Partly consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support in part submission 271 ref. 98</i>		• <i>Partly consistent with Ernslaw One's submission.</i>
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 271 ref. 98</i>		• <i>Linking to cessation of rainfall does not reflect natural processes.</i>
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 98</i>		• <i>Background data required before any steps are taken to restrict 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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 98</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>

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 271 ref. 98</i>		<ul style="list-style-type: none"> • <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>City Forests</i>	1071	<i>Support in part submission 271 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 98</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
Ken Telford	272	Did not specify	Need to recognise the differences in rainfall events. You cannot expect the same rate of sediment settling after rainfall of 4mm as you can for 40mm, let alone 100mm.	<ul style="list-style-type: none"> • One rule is not enough to cover sedimentation by runoff. • Need to consider variations in rainfall events.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 272 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i>
T M and C M Scurr	275	Amend	That the wording of this rule addressing discharge cessation be amended to allow historic and concentrated runoff for water clarity.	<ul style="list-style-type: none"> • Need to allow for different situations that don't fit with cessation timeframes e.g. Spring thaw.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 275 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i>
Federated Farmers of New Zealand	278	Amend	<p>Adopt the rule with the following amendments:</p> <p>"The discharge of sediment to water is a permitted activity, providing: (i) From 31 March 2013 where land has been disturbed all reasonable steps are taken to avoid the discharge of sediment from land to water; and (ii) From 31 March 2017..."</p> <p>"The discharge of sediment to water is a permitted activity, providing: (i) All reasonable steps are taken to avoid the discharge of sediment from land to water; and (ii)After the cessation of rainfall ..."</p>	<ul style="list-style-type: none"> • Concerned with workability of rule from a farm management perspective, may be realistically and scientifically impossible to achieve standards. • Concerned with impact on flow-on effect of discharge or sediment from land above, or upstream of a property. • One-size-fits-all approach difficult to implement, enforce and comply with from a plan user perspective. • Rule has immediate effect meaning breaches have already occurred. • Erosion and sediment runoff can occur irrespective of land use. • Consideration is needed as to how the rule will operate in practice and an alternative measure of sediment loss after rainfall ceases would be more appropriate and enforceable over time.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 98</i>		<ul style="list-style-type: none"> • <i>Practical and workable alternatives, solutions and suggestions.</i>
<i>Rayonier New Zealand Limited</i>	1015	<i>Support in part submission 278 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Rayonier's submission.</i>
<i>Ernslaw One Ltd</i>	1016	<i>Support in part submission 278 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with Ernslaw One's submission.</i>
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 98</i>		<ul style="list-style-type: none"> • <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. 98</i>		<ul style="list-style-type: none"> • <i>No reason given.</i>
<i>Glenshee Station Limited</i>	1062	<i>Support in part</i>		<ul style="list-style-type: none"> • <i>Although it doesn't request total plan change withdrawal it recognises</i>

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		<i>submission 278 ref. 98</i>		<i>Glenshee's concerns, namely there has been little/no analysis/discussion of economic or social impacts of the discharge limits.</i> <ul style="list-style-type: none"> • <i>Plan change is vague and application uncertain, leaving farmers unable to understand if they comply with requirements.</i>
<i>City Forests</i>	<i>1071</i>	<i>Support in part submission 278 ref. 98</i>		<ul style="list-style-type: none"> • <i>Partly consistent with City Forest's submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Support in part submission 278 ref. 98</i>		<ul style="list-style-type: none"> • <i>Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use.</i>
Wenita Forest Products	279	Amend	<p>Insert a restricted [discretionary] activity standard for activities that are non-compliant with this rule.</p> <p>Review and amend the rule in consultation with the plantation forestry sector to address the concerns expressed in this submission or otherwise delete this rule.</p> <p>That the Council carry out a detailed investigation into the turbidity limits commonly occurring in the Otago Region. Council should then be able to set turbidity threshold limits accordingly.</p>	<ul style="list-style-type: none"> • Needs to provide for a reasonable period following cessation of rain to allow stormwater / snowmelt to flow off the land. • Doesn't provide for any sedimentation threshold limit. • Practical difficulties with measuring compliance within the specified one hour timeframe; six hours would be far more practicable. • Thresholds inappropriate and unnecessary and not supported by robust scientific data. • Achievability of meeting rule unclear.
<i>Calder Stewart Industries Limited</i>	<i>1049</i>	<i>Support submission 279 ref. 98</i>		<ul style="list-style-type: none"> • <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> • <i>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</i> • <i>Matters relating to reasonable mixing need to be reconsidered.</i>
New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282	Amend	<p>Insert a restricted discretionary activity standard for activities that are non-compliant.</p> <p>Review and amend the rule in consultation with the plantation forestry sector to address the concerns expressed in this submission or otherwise delete this rule.</p>	<ul style="list-style-type: none"> • Needs to provide for a reasonable period following cessation of rain to allow stormwater / snowmelt to flow off the land. • Doesn't provide for any sedimentation threshold limit. • Practical difficulties with measuring compliance within the specified one hour timeframe; six hours would be far more practicable. • Thresholds inappropriate and unnecessary and not supported by robust scientific data. • Achievability of meeting rule unclear.
<i>Calder Stewart Industries Limited</i>	<i>1049</i>	<i>Support submission 282 ref. 98</i>		<ul style="list-style-type: none"> • <i>Plan change should recognise the specific nature of plantation forestry.</i> • <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> • <i>Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions.</i> • <i>Matters relating to reasonable mixing need to be reconsidered.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 282 ref. 98</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
City Forests Limited	283	Amend	<p>Insert a controlled activity standard for activities that are non-compliant.</p> <p>Review and amend the rule in consultation with the plantation forestry sector to address the concerns expressed in this submission or otherwise delete this rule.</p>	<ul style="list-style-type: none"> • Needs to provide for a reasonable period following cessation of rain to allow stormwater / snowmelt to flow off the land. • Doesn't provide for any sedimentation threshold limit. • Practical difficulties with measuring compliance within the specified one hour timeframe; six hours would be far more practicable. • Thresholds inappropriate and unnecessary and not supported by robust scientific data. • Achievability of meeting rule unclear.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Calder Stewart Industries Limited	1049	Support submission 283 ref. 98		<ul style="list-style-type: none"> • Rules in 12.C need to be more precise and further clarity is needed for activity status of activities that breach the rules. • Agree with submission in relation to Chapter 7, 12. overall strategic approach and prohibitions. • Matters relating to reasonable mixing need to be reconsidered.
Federated Farmers of New Zealand	1057	Support submission 283 ref. 98		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable.
Alliance Group Limited	1060	Support submission 283 ref. 98		<ul style="list-style-type: none"> • 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.
Fish and Game (Otago)	287	Amend	Review the workability in a practical sense of this rule, and make amendments to ensure rule is workable and effective.	<ul style="list-style-type: none"> • Monitoring requirements of 1 and 12 hours after rain may be difficult, proxy points may be used. • The difference between 40 NTU and 5 NTU allows for initial sediment pulses following rain. • Approach may be so tough that most farmers noncompliant, so rules become ineffective. • Test this standard in sample catchments before it takes effect.
Craiglea Limited	1012	Oppose submission 287 ref. 98		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
Rayonier New Zealand Limited	1015	Support submission 287 ref. 98		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support submission 287 ref. 98		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
Mr RJ Borst	1034	Oppose submission 287 ref. 98		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
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	1054			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Association</i>				
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 287 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable to meet objectives.
<i>City Forests</i>	1071	<i>Support submission 287 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 287 ref. 98</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Southern Wood Council	289	Amend	<p>Insert a controlled activity standard for activities that are non-compliant.</p> <p>Review and amend the rule in consultation with the plantation forestry sector to address the concerns expressed in this submission or otherwise delete this rule.</p>	<ul style="list-style-type: none"> • Needs to provide for a reasonable period following cessation of rain to allow stormwater / snowmelt to flow off the land. • Doesn't provide for any sedimentation threshold limit. • Practical difficulties with measuring compliance within the specified one hour timeframe; six hours would be far more practicable. • Thresholds inappropriate and unnecessary and not supported by robust scientific data. • Achievability of meeting rule unclear.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 289 ref. 98</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
<i>Alliance Group Limited</i>	1060	<i>Support submission 289 ref. 98</i>		<ul style="list-style-type: none"> • 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.
Deer Industry New Zealand	293	Amend	Rule be amended so it is easy to determine compliance and the standard applying after discharge with provision made for reasonable mixing and remedial action or mitigation prior to the water leaving the property or local catchment.	<ul style="list-style-type: none"> • Overly complex in relation to definition, clarity of understanding, and consistency. • Ability of farmers to monitor this level of precision and timing is questionable. • Treating water leaving the property on large farms rather than point of entry is more appropriate.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 293 ref. 98</i>		<ul style="list-style-type: none"> • Rule unclear.
<i>Rayonier New Zealand Limited</i>	1015	<i>Support submission 293 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with Rayonier's submission.
<i>Ernslaw One Ltd</i>	1016	<i>Support submission 293 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with Ernslaw One's submission.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 293 ref. 98</i>		<ul style="list-style-type: none"> • Limits unrealistic and scientifically impossible to achieve in some situations. • Concern with effect of discharges upstream. • One size fits all approach difficult to implement, enforce and comply with.
<i>City Forests</i>	1071	<i>Support submission 293 ref. 98</i>		<ul style="list-style-type: none"> • Consistent with City Forest's submission.
Janefield Farm	296	Amend	Support the permitted activity rule that provides for this but with longer lead in times.	<ul style="list-style-type: none"> • No reason given.
<i>Albert McTainsh</i>	1004	<i>Support submission 296 ref. 98</i>		<ul style="list-style-type: none"> • Provides science-based, workable and practical suggestions.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Clydevale Dairy Farms Ltd	297	Amend	Delete this rule or amend it so that that the standard applies after discharge with provision made for reasonable mixing and that compliance is easy to determine.	<ul style="list-style-type: none"> • Rule is impractical and unworkable. • Hard to determine when rainfall has ceased, then measure nonpoint source discharge before it enters the water (no mixing zone). • Measurement is in NTU; question whether farmers have technical ability or time to carry out work to determine whether farm complies.
Greenfield Farming Ltd	298			
Big River Dairy Limited	299			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 297 – 299 ref. 98</i>		<ul style="list-style-type: none"> • <i>Concern with effect of discharges upstream.</i> • <i>One size fits all approach difficult to implement, enforce and comply with.</i> • <i>Need for reasonable mixing.</i>
M W Smith	300	Oppose	Oppose.	<ul style="list-style-type: none"> • 12 hour post rain contaminant window is flawed, as it may take more than 12 hours for water to leave/recede • General uncertainty as to what constitutes rain: drizzle, 3 weeks of fog? • Unclear if can measure water on a paddock before it starts to run.
<i>Albert McTainsh</i>	1004	<i>Support submission 300 ref. 98</i>		<ul style="list-style-type: none"> • <i>Realistic.</i> • <i>Difficulties around measurement with 12.C.1.1.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 300 ref. 98</i>		<ul style="list-style-type: none"> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Need provision for reasonable mixing.</i>
Graylands Farms Ltd	302	Oppose	12.C.1.1 should be deleted and more research done to discover a relative timeframe and maybe a more realistic clarity level measurement.	<ul style="list-style-type: none"> • Not just a matter of land use, but also of weather history and time of testing. • After long dry period, heavy rain made creeks discoloured 12 hours after, due to loose soil, worm casts, leaves, twigs, dust and dirt, even from fenced off bush. • Not sure if light showers or skiffs are "rain". • After first rain in a while, land is washed and creeks are a lot cleaner through subsequent rain.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 302 ref. 98</i>		<ul style="list-style-type: none"> • <i>Submitter seeks recognition of systems having different characteristics.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 302 ref. 98</i>		<ul style="list-style-type: none"> • <i>Limits unrealistic and scientifically impossible to achieve in some situations.</i> • <i>Concern with effect of discharges upstream.</i> • <i>One size fits all approach difficult to implement, enforce and comply with.</i>
Philip, Heather & Geoff Wilson	304	Oppose	Take into account that after rain stops, the creeks can be unclear for up to 3 days.	<ul style="list-style-type: none"> • Creeks flowing into our property can be unclear for up to 3 days.
<i>Waitaki District Council</i>	1003	<i>Support in part submission 304 ref. 98</i>		<ul style="list-style-type: none"> • <i>Submitter seeks recognition of systems having different characteristics.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 304 ref. 98</i>		<ul style="list-style-type: none"> • <i>Clarity required.</i> • <i>One size fits all approach difficult to implement, enforce and comply with.</i> • <i>Need for reasonable mixing.</i>
The Director-General of Conservation	306	Amend	That 12.C.1.1 be amended as follows, or to like effect: "The discharge of sediment to water is a permitted activity, providing: (i) After the cessation of rainfall on site, the discharge does not cause either or all of the following effects: (a) Sedimentation; or (b) Any conspicuous change in colour or visual clarity; or (c) Any significant adverse effects on aquatic	<ul style="list-style-type: none"> • 12.C.1.1(i) is contrary to RMA section 107(1). • Criteria "one hour after rain" and "5 and 40 NTU are ultra vires under RMA section 70 as potentially allows discharge. Could result in change in visual clarity.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			life. (ii)(a) Any discharge from a site shall not exceed water clarity of 40 nephelometric turbidity units, and/or (ii)(b) More than twelve hours after rain on site any discharge shall not exceed water clarity of 5 nephelometric turbidity units". That 12.C.1.1(ii)b) is rewritten so that it is both effective and applicable during showery days.	
ME Elston	1002	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> Provisions should reflect the actual wording in Section 107 of the Act, not the selective interpretation put forward by submitter.
Craiglea Limited	1012	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> No evidence from environmental impacts from agricultural activities. Changes are vague, unclear and open-ended. No need for further restrictions on discharges.
Rayonier New Zealand Limited	1015	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> Inconsistent with Rayonier's submission.
Ernslaw One Ltd	1016	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> Inconsistent with Ernslaw One's submission. Submitter fails to address runoff from snowmelt.
Hopefield Investments Ltd	1019	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> 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.
Strath Taieri Community Board	1029	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> No reason given.
Horticulture New Zealand	1032	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> Linking to cessation of rainfall does not reflect natural processes.
Mr RJ Borst	1034	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> 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.
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
Clutha District Council	1050			
Central Otago District Council	1051			
Moutere Station Limited	1052	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • Very wide changes sought without evidence of environmental impact, including land management practice. • Vague, unclear, open-ended changes, uncertain baseline for Council to determine enhancement. • Inappropriate and costly to require consents for structures over rivers, lakes & RSWs, or in areas of alleged significant aquatic values - keep relevant provisions as notified. • Seasonal muster restrictions inappropriate, permit at least 12 crossings per year. • Shouldn't restrict necessary farming discharges. • No gain from high & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.
Hawkdun Station	1053			
Central Otago Wine Growers Association	1054	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • 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.
Otago Water Resource Users Group	1056	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • 12.C.1.1(i): The rule is to address sedimentation and not colour change; effects of sedimentation adequately addressed. • 12.C.1.1(ii): A turbidity tolerance after rain events is practical and necessary.
Federated Farmers of New Zealand	1057	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • Limits unrealistic and scientifically impossible to achieve in some situations. • Concern with effect of discharges upstream. • One size fits all approach difficult to implement, enforce and comply with and suggested changes exacerbate those issues.
Alliance Group Limited	1060	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • 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.
Glenshee Station Limited	1062	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • Opposes the support in DoC's submission for reasons in Glenshee's original submission.
Hawkdun Idaburn Irrigation Company Limited	1066	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • Oppose (i) - expanded definition. Sedimentation as proposed by ORC is more than sufficient. Presumably discharges from DoC land will be monitored as well as farmers.
City Forests	1071	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • Inconsistent with City Forest's submission.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Greenfield Rural Opportunities Limited	1077	Oppose submission 306 ref. 98		<ul style="list-style-type: none"> • 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. • Rules fail relevant tests under section 32 RMA. • Additional controls not justified in terms of effects. • Seek the submission be disallowed.
Clutha District Council	308	Amend	Rule be amended so it is easy to determine compliance and the standard applying after discharge with provision made for	<ul style="list-style-type: none"> • Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			reasonable mixing. The relationship with Rule 12.1.0.4 needs to be clarified. Alternatively remove the rule altogether, as the desired result can be achieved through rule 12.C.0.2 following its revision as sought in this submission.	<ul style="list-style-type: none"> Concerned about practicality of monitoring on a day-to-day basis, particularly NTU. Unclear what the significance of thresholds for turbidity and timeframes comes from. No provision for reasonable mixing. Measuring turbidity of a non-point source discharge, prior to the discharge, is impossible. Unclear how related to rule 12.1.0.4. Unclear wording re: turbidity vs. clarity.
<i>Waitaki District Council</i>	1003	<i>Support submission 308 ref. 98</i>		<ul style="list-style-type: none"> Seeks clarification of rule Rule impractical
<i>Meridian Energy Limited</i>	1014	<i>Support submission 308 ref. 98</i>		<ul style="list-style-type: none"> "Reasonable mixing" should be provided for in the proposed rules. Catchment dynamics should be determined by a robust Section 32 assessment. Supports an overall clarification of the rule structure and how each activity status within rules in Section 12C relates to one another.
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 98</i>		<ul style="list-style-type: none"> No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 98</i>		<ul style="list-style-type: none"> No reason given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 98</i>		<ul style="list-style-type: none"> Limits unrealistic and scientifically impossible to achieve in some situations. Concern with effect of discharges upstream. One size fits all approach difficult to implement, enforce and comply with.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 98</i>		<ul style="list-style-type: none"> Seek that the submission be allowed and the Plan Change amended as per the submission.
Central Otago District Council & Clutha District Council	309	Amend	Rule be amended so it is easy to determine compliance and the standard applying after discharge with provision made for reasonable mixing. The relationship with Rule 12.1.0.4 needs to be clarified.	<ul style="list-style-type: none"> Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall. Concerned about practicality of monitoring on a day-to-day basis, particularly NTU. Unclear what the significance of thresholds for turbidity and timeframes comes from. No provision for reasonable mixing. Measuring turbidity of a non-point source discharge, prior to the discharge, is impossible. Unclear how related to rule 12.1.0.4. Unclear wording re: turbidity vs. clarity.
<i>Waitaki District Council</i>	1003	<i>Support submission 309 ref. 98</i>		<ul style="list-style-type: none"> Seeks clarification of rule Rule impractical
<i>Meridian Energy Limited</i>	1014	<i>Support submission 309 ref. 98</i>		<ul style="list-style-type: none"> "Reasonable mixing" should be provided for in the proposed rules. Supports an overall clarification of the rule structure and how each activity status within rules in Section 12C relates to one another.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 98</i>		<ul style="list-style-type: none"> No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309</i>		<ul style="list-style-type: none"> No reason given.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
		<i>ref. 98</i>		
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 309 ref. 98</i>		<ul style="list-style-type: none"> • <i>Provision for reasonable mixing is supported.</i>
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 98</i>		<ul style="list-style-type: none"> • <i>Support that changes prevent effects of discharges being assessed on case by case basis.</i> • <i>Agree prohibited status should be removed.</i> • <i>Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable.</i> • <i>Support that reasonable mixing be provided for.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 98</i>		<ul style="list-style-type: none"> • <i>Limits unrealistic and scientifically impossible to achieve in some situations.</i> • <i>Concern with effect of discharges upstream.</i> • <i>One size fits all approach difficult to implement, enforce and comply with.</i>
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 98</i>		<ul style="list-style-type: none"> • <i>Seek that the submission be allowed and the Plan Change amended as per the submission.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 309 ref. 98</i>		<ul style="list-style-type: none"> • <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>Effects-based approach accords with RMA principles and provides flexibility to consider local environmental conditions and economic considerations.</i>
Glen Dene Limited	310	Amend	<p>Rule 12.C.1.1 be amended so it is easy to determine compliance and the standard applying after discharge with provision made for reasonable mixing.</p> <p>The relationship with Rule 12.1.0.4 needs to be clarified.</p>	<ul style="list-style-type: none"> • Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall. • Concerned about practicality of monitoring on a day-to-day basis, particularly NTU. • Unclear what the significance of thresholds for turbidity and timeframes comes from. • No provision for reasonable mixing. • Measuring turbidity of a non-point source discharge, prior to the discharge, is impossible. • Unclear how related to rule 12.1.0.4.
Ben Graham	311			
Wyllies Crossing Limited	312			
Calder Stewart Industries Limited	313	Amend	<p>Rule 12.C.1.1 be amended so it is easy to determine compliance and the standard applying after discharge with provision made for reasonable mixing.</p> <p>The relationship with Rule 12.1.0.4 needs to be clarified.</p> <p>The rule be amended to provide for short term discharges that breach the Schedule 16 standards but do not result in adverse environmental effects.</p> <p>Consenting regime be incorporated for activities that cannot comply with this rule to allow environmental effects to be considered on a case-by-case basis.</p>	<ul style="list-style-type: none"> • Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall. • Concerned about practicality of monitoring on a day-to-day basis, particularly NTU. • Unclear what the significance of thresholds for turbidity and timeframes comes from. • No provision for reasonable mixing. • Measuring turbidity of a non-point source discharge, prior to the discharge, is impossible. • Unclear how related to rule 12.1.0.4 and what the consenting regime is for an activity that does not comply with rule. • Activities (e.g. quarrying and land development) may produce sedimentation beyond timeframes but not have any effects.
Greer Farms Partnerships	314	Amend	<p>Rule 12.C.1.1 be amended so it is easy to determine compliance and the standard applying after discharge with provision made for reasonable mixing.</p> <p>The relationship with Rule 12.1.0.4 needs to be clarified.</p>	<ul style="list-style-type: none"> • Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall. • Concerned about practicality of monitoring on a day-to-day basis, particularly NTU. • Unclear what the significance of thresholds for turbidity and timeframes comes from. • No provision for reasonable mixing.
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			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Macraes Community Incorporated	319			<ul style="list-style-type: none"> Measuring turbidity of a non-point source discharge, prior to the discharge, is impossible. Unclear how related to rule 12.1.0.4.
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			
Waitaki District Council	1003	Support submissions 310 - 326 ref. 98		<ul style="list-style-type: none"> Seeks clarification of rule Rule impractical Submitter seeks amendment to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.
Federated Farmers of New Zealand	1057	Support submissions 310 – 326 326 ref. 98		<ul style="list-style-type: none"> Limits unrealistic and scientifically impossible to achieve in some situations. Concern with effect of discharges upstream. One size fits all approach difficult to implement, enforce and comply with.
Rayonier New Zealand Limited	1015	Support submissions 319 and 320 ref. 98		<ul style="list-style-type: none"> Consistent with Rayonier's submission.
Ernslaw One Ltd	1016	Support submissions 319, 320 & 323 ref. 98		<ul style="list-style-type: none"> Consistent with Ernslaw One's submission.
City Forests	1071	Support submissions 319 and 320 ref. 98		<ul style="list-style-type: none"> Consistent with City Forest's submission.
Alliance Group Limited	1060	Support submission 323 ref. 98		<ul style="list-style-type: none"> 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.
Glenshee Station Limited	1062	Support in part submission 326 ref. 98		<ul style="list-style-type: none"> 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.
Alastair Cocks	334	Oppose	No decision requested.	<ul style="list-style-type: none"> The water of the Wyndham River in its natural state cannot achieve the required standard of water clarity within 12 hours after rainfall ceases. Proposed changes could severely compromise ability to farm unless the right balance is achieved. Short notice (received flyer in mail the day submissions were due) and pressure of seasonal work obstacle to preparing a submission. Need more time to gather information on impact of proposed levels for various nutrients.
Federated Farmers of New Zealand	1057	Support submission 334 ref. 98		<ul style="list-style-type: none"> Limits unrealistic and scientifically impossible to achieve in some situations. Concern with effect of discharges upstream. One size fits all approach difficult to implement, enforce and comply with.

99 Rule 12.C.1.2 - Schedule 16 contaminants permitted

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
G R Crutchley	42	Amend	That part of 12.C.2. be reworded to read: "(ii) Land in a manner that it may enter water, is a permitted activity, providing the quantity of contaminant in the discharge does not exceed the limits given in Schedule 16, where the discharge is about to enter water. This provision may not apply where limits are temporarily exceeded due to excessive run off from land where this is directly attributable to recent significant rainfall."	<ul style="list-style-type: none"> • Original condition relating to timing of the rainfall impractical due to differing performance of catchments. • Requirement to define the end of a rainfall event. • Rewording requires subjective assessment, however offers protection against unfair application. • Allows ORC to enforce trigger levels during fine periods when need for enforcement greatest.
<i>Otago Water Resource Users Group</i>	1056	<i>Support in part submission 42 ref. 99</i>		<ul style="list-style-type: none"> • <i>Modify the rule to accommodate a longer run-off period when this occurs naturally.</i>
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 42 ref. 99</i>		<ul style="list-style-type: none"> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 42 ref. 99</i>		<ul style="list-style-type: none"> • <i>Rule as proposed is most appropriate method to achieve objectives and policies.</i> • <i>Rule as proposed best meets the purpose of the RMA.</i>
Glenayr Ltd (D & D Sangster)	59	Oppose	We 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"> • Discharge can be caused by events other than rain, e.g. snow melt. • Not wanting to be responsible for neighbouring dairying discharges. • How practical it is for measuring discharge before it enters water. • Currently border dyke and expensive to convert.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 59 ref. 99</i>		<ul style="list-style-type: none"> • <i>Discharge can also be caused by snow melt; unfair to hold one farm accountable for other runoff.</i> • <i>Difficulty in measuring discharge before it enters water.</i>
Peter Deans & Graham Deans	63	Amend	Amend rule so E coli levels lifted in the drier summer months.	<ul style="list-style-type: none"> • Proposed level too low for summer as there is more stock on farms. • See Owaka catchment study results.
Greg Ramsay & Gae Stott	68	Amend	Lift acceptable NNN guidelines to 1.5 - 2 (mg/l) instead of 0.45 mg/l in winter. E. Coli levels need to be considerably higher in the drier, summer times, possibly 600 (cfu/100ml).	<ul style="list-style-type: none"> • Unachievable in winter or times of heavy rainfall. • 126 E. Coli cfu/100 ml unachievable (see Upper Owaka Catchment Results - 2/2/2012).
Hawkdun Idaburn Irrigation Company Ltd	70	Did not specify	Should all be permitted.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Region wide standards and limits - regional or local conditions vary, so common sense has to be balancing factor.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 70 ref. 99</i>		<ul style="list-style-type: none"> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Need provision for reasonable mixing.</i>
B R Philpott	71	Amend	Permit discharges from; and exempt from; for e-coli runoff in relation to natural causes.	<ul style="list-style-type: none"> • Significant populations of water fowl uncontrollable, cause prolonged fowling of paddocks and waterways.
Braemorn Farm Ltd	81	Amend	Reassess the levels set in Schedule 16 to ensure they are practical and achievable levels.	<ul style="list-style-type: none"> • Schedule 16 levels unachievable as per information given out at ORC field days.
Roger Fox	82	Amend	[Condition under (ii)] should be 36 hours.	<ul style="list-style-type: none"> • With vegetation cover, water will still be carrying sediment at lesser time.
Invernia Holdings Ltd	83	Oppose	Increase time period to at least 48 hours.	<ul style="list-style-type: none"> • Time period too short.
Melvyn John Kington	84	Amend	Reassess the levels set in Schedule 16 to ensure they are practical and achievable levels.	<ul style="list-style-type: none"> • Schedule 16 levels unachievable as per the information given out at ORC field days.
Tim Petrie	85			
John McKenzie	87			
Mark Cain	91			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Wallace Evan Strachan	95	Oppose	[Oppose 12 hours in Rule 12.C.1.2 ,re] (i), (ii) natural water runoff.	<ul style="list-style-type: none"> • 12 hours after rain ceasing ridiculous - on our farm natural runoff can continue for more than 5 days.
Ross A & Alexa Wallace	101	Amend	12.C.1.2 (ii) Change twelve to twenty four hours.	<ul style="list-style-type: none"> • Creeks can take some time to settle after significant rainfall. • Allow wetlands and sediment traps to operate under winter conditions.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 101 ref. 99</i>		<ul style="list-style-type: none"> • <i>Enables more achievable timeframes and will allow for wetlands and similar systems to operate.</i> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
Daniel Groundwater	107	Oppose	Reassess levels to ensure they are achievable.	<ul style="list-style-type: none"> • Levels can not be achieved by the majority of farmers. • To allow better research to be carried out for feasibility.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 107 ref. 99</i>		<ul style="list-style-type: none"> • <i>Measures not realistic and don't account for differing regions and systems.</i> • <i>Farmers may breach limits despite taking precautions.</i>
Barry Fox	110	Amend	Reassess levels set in Schedule 16.	<ul style="list-style-type: none"> • Unachievable to 95% of farmers.
Phil James	111	Amend	Change levels in Schedule 16.	<ul style="list-style-type: none"> • Make them more achievable.
Sarah Cooper	112	Amend	Reassess levels set in Schedule 16.	<ul style="list-style-type: none"> • Unachievable.
Fiona Rudduck	113	Amend	Reassess levels set in Schedule 16.	<ul style="list-style-type: none"> • Unviable constraints to most farmers' operations.
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 113 ref. 99</i>		<ul style="list-style-type: none"> • <i>Measures not realistic and don't account for differing regions and systems.</i> • <i>Farmers may breach limits despite taking precautions.</i>
A J & A J Anderson	120	Amend	12 hours should be changed to 48 hours.	<ul style="list-style-type: none"> • After a heavy rain event water continues to drain off land for 48 hours (or more).
Jane Young	124	Amend	Add: "Where the management structure of a farm is such that significant non-compliance is a likely outcome, the land owner must be able to demonstrate to Council that his/her activities will not cause contamination of waterways."	<ul style="list-style-type: none"> • Standards often qualitative not quantitative.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	<i>1074</i>	<i>Oppose in part submission 124 ref. 99</i>		<ul style="list-style-type: none"> • <i>Schedule 16 does not take into account local environmental conditions and economic/development consideration.</i> • <i>Schedule 16 is disproportionate and overly restrictive.</i> • <i>Does not allow for greater flexibility (particularly in relation to timeframes) to ensure that disproportionate costs are not imposed on existing farming operations.</i>
Andrew Jackson	132	Amend	12 hrs increased to 36 hrs.	<ul style="list-style-type: none"> • Limits set too high, which would cost a lot to control, if at all.
The Cow Farm Limited	133	Amend	Amend the rule to provide better measurability and clarity.	<ul style="list-style-type: none"> • Doesn't give any indication of how or where the quantity of contaminant is measured, • Doesn't take into account different receiving environments.
M L & P J Lord Family Trust	143	Amend	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. Review limits in terms of whether they are achievable and make full assessment against the economic impacts of the limits.	<ul style="list-style-type: none"> • Process of setting timeframes for meeting limits must account for achievability and economic cost for meeting limits within specified timeframes. • Not clear if limits are workable or achievable. • Larger question of water quality has not been put side by side with the cost of implementing proposed standards.
<i>Albert McTainsh</i>	<i>1004</i>	<i>Support submission 143 ref. 99</i>		<ul style="list-style-type: none"> • <i>Practical alternatives & more workable rules offered.</i>
<i>Federated Farmers of New Zealand</i>	<i>1057</i>	<i>Support submission 143 ref. 99</i>		<ul style="list-style-type: none"> • <i>Limits not realistic or achievable, result could be economic unviability.</i> • <i>Science doesn't justify stringency.</i>

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Dairy NZ Limited	146	Amend	Change the rule to one that would allow stormwater discharges with no significant adverse effects to be permitted activities. Change the rule to make it clear what clause (ii) applies to. For example, "that" could be replaced by "...where that contaminant or another subsequent contaminant..."	<ul style="list-style-type: none"> Standards difficult to meet. Many small discharges would not be justified. No technical publication justifying standards. Common practice to specify maximum total suspended solids.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 146 ref. 99</i>		<ul style="list-style-type: none"> Limits not realistic or achievable, result could be economic unviability. Science doesn't justify stringency.
<i>Alliance Group Limited</i>	1060	<i>Support submission 146 ref. 99</i>		<ul style="list-style-type: none"> 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</i>	1074	<i>Support in part submission 146 ref. 99</i>		<ul style="list-style-type: none"> Need for provision in the transitional provisions for resource consents for existing discharges, even where they don't meet the proposed discharge standards.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 146 ref. 99</i>		<ul style="list-style-type: none"> Oppose any aspects of the submission that are contrary to the further submitter's primary submission.
Gerard Booth	159	Amend	Needs to be reassessed to make sure the standards are achievable.	<ul style="list-style-type: none"> Standards may be unachievable.
John Latta	162	Amend	Increase 12 hours to 36 hours. On the Owaka River they [Schedule 16 discharge limits] should be lifted considerably, or dispensed with altogether.	<ul style="list-style-type: none"> Hard to measure. Saturated land needs longer than 12 hours to drain naturally. Owaka River breaches Schedule 16 guidelines on a number of occasions over past 24 months, yet ecological condition of all streams, including Owaka, good. Stream life/inhabitants are the judges of the health of any stream. TN, NNN, TP and DRP cause aquatic growth, but with high rainfall and flushing, cool temperature it is minimal, and there is an excellent trout fishery. Aquatic growths can make swimming unpleasant, too cold to swim in Owaka. Suspended sediment affects stream life, yet this is excellent. E Coli a risk to human and stock health, but no one swims or drinks from Owaka, and no reported problems with stock drinking water.
Matuanui Ltd	163	Oppose	Delete rule and investigate further the following issues: - Rainfall as a measure is unenforceable and vague. - Uncertainty about sampling and meeting the requirements of the rule. - Science behind, and achievability of the Schedule 16 limits. - Doesn't appear to be effects based. A sampling method is needed.	<ul style="list-style-type: none"> Unreasonable/impossible for water to be as pure 200 m from tile drain, difficult to achieve without allowing for some dilution. Uncertainty about sampling and meeting the requirements of this rule. ORC's water strategy states easy methods of measuring the discharge are crucial and that new farmer-friendly devices are available to measure discharge quality from land - where are these?
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 163 ref. 99</i>		<ul style="list-style-type: none"> Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. Concern with workability. Needs to be achievable and cost effective.
James Watt	167	Amend	12.C.1.2 (ii) 24 hours after rain ceases on site waterbody leaving your land does not exceed the limits in Schedule 16.	<ul style="list-style-type: none"> Provide for winter grazing of crops. Allows time for mitigation measures to function.
Dawn Dunjey	168	Oppose	Reassess the levels set in Schedule 16 to ensure these are practical and achievable.	<ul style="list-style-type: none"> Unachievable.
Ross Hay	173			
Niere Kitson	174			
Logan Sopson	175			
Barry Diedrichs	176			

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
Quambatook Ltd	182			
Trevor Stanger	183			
Kate Streeter	184			
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submissions 168, 173 – 176 & 182 – 184 184 ref. 99</i>		<ul style="list-style-type: none"> • Difficult to monitor and enforce due to differing performance of catchments following rainfall. • Farmers may not know if they are complying or not at a particular time. • More technical robustness needed. • Need provision for reasonable mixing.
Windsor Park Dairies Ltd	185	Amend	Oppose 12 hr time limit post rain for sampling. Suggest a minimum of 36 hours be a more realistic timeframe.	<ul style="list-style-type: none"> • 12 hrs post rainfall impractical, unreliable. • Varying land contours means different areas drain differently, \water can flow overland for days before reaching a waterway. • Allow nature to take its course. • 36 hours will also allow time to identify and address any non point source pollution accruing.
Mitchell & Webster Ltd	186	Amend	Support the improvement of water quality in water discharges but with realistic and achievable levels which are based on scientific research for the environment the water discharges are occurring in.	<ul style="list-style-type: none"> • Levels in plan not realistically achievable - even with best farm practices.
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"> • Have taken a number of water tests on farm. • Limits should be set closer to what we can achieve without compromising production.
Grant Ludemann	191	Amend	12 hours be changed to 24 hours.	<ul style="list-style-type: none"> • Drainage takes longer after prolonged easterly rains in North Otago, compared to short sharp rainfall events.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 191 ref. 99</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable and cost effective.
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"> • Unwarrantable to a sheep farmer, influenced by the dairy market. • A farmer does not have the time or knowledge to do the required testing.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 193 ref. 99</i>		<ul style="list-style-type: none"> • Doesn't allow for natural variation between catchments or weather events that cause natural turbidity. • Concern with workability of timeframes. • Needs to be achievable and cost effective.
Dairy Holdings Limited	195	Oppose	Supportive of the general permitted activity approach but opposed to Rule 12.C.1.2 in so far as that approach is consistent with [submitter's] views on Schedule 16. Seeks an appropriate definition of rainfall.	<ul style="list-style-type: none"> • Standards difficult to meet, would not ensure receiving water standards are met for many small discharges. • Rain not defined.
<i>Waitaki Irrigators Collective Limited</i>	1031	<i>Support submission 195 ref. 99</i>		<ul style="list-style-type: none"> • Submission outlines concern of further submitter.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 195 ref. 99</i>		<ul style="list-style-type: none"> • Support in part, particularly regarding wider effect of the plan change. • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 195 ref. 99</i>		<ul style="list-style-type: none"> • Plan should adopt an effects based approach to managing rural discharges with a focus on controlling contaminant discharges, rather than land-uses.
Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197	Amend	Rule 12.C.1.2 be deleted OR	<ul style="list-style-type: none"> • Implementation difficult, unclear when measurements should be made, or allowable non-compliance period. • Specific measurements required to determine compliance. • Where is discharge "about to enter water"?

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Rule 12.C.1.2 should be redrafted to link what is occurring on-site during rainfall to the outcomes sought within the freshwater body. The redrafted rule should be clear, enforceable and enable people to determine whether they comply with the rule.	<ul style="list-style-type: none"> Effectively permits a mixing zone for 12 hrs, inconsistent with Policy 7.D.1. Significant concerns over implementation and enforcement, continual sampling at multiple locations potentially required.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 197 ref. 99</i>		<ul style="list-style-type: none"> Supports clear enforceable rule which people are able to determine if they comply with it.
<i>Otago Water Resource Users Group</i>	1056	<i>Oppose in part submission 197 ref. 99</i>		<ul style="list-style-type: none"> A clear transitional period after a rain event is necessary.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 197 ref. 99</i>		<ul style="list-style-type: none"> 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. 99</i>		<ul style="list-style-type: none"> 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. 99</i>		<ul style="list-style-type: none"> Does not allow for greater flexibility to be introduced (particularly in relation to the timeframes).
NZ Transport Agency	203	Amend	Revise rule to make location of compliance clear and practicable.	<ul style="list-style-type: none"> Clear definition of the point of compliance needed. Definition of water would be farm drains, stream, river, lake, wetland, groundwater. Compliance with Schedule 16 almost impossible to determine as sampling of overland flow and discharges to groundwater problematic. Imposing limits at locations where determining compliance is problematic.
<i>Dunedin City Council</i>	1025	<i>Support submission 203 ref. 99</i>		<ul style="list-style-type: none"> No reasons given.
<i>Alliance Group Limited</i>	1060	<i>Support submission 203 ref. 99</i>		<ul style="list-style-type: none"> 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.
Trustpower Limited	206	Amend	Amend the proposed rule as follows: "Excluding discharges captured by Rule 12.C.1.6, the discharge of a contaminant listed in Schedule 16 to:..."	<ul style="list-style-type: none"> Clarity on how rules work together Rule should not apply in addition to meeting Rule 12.1.2.6 for dam discharges.
<i>Contact Energy Limited</i>	1013	<i>Support submission 206 ref. 99</i>		<ul style="list-style-type: none"> Reasons stated in the submission.
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose in part submission 206 ref. 99</i>		<ul style="list-style-type: none"> Inconsistent with relief sought by further submitter.
M C Holland Farming Ltd	207	Amend	That Rule 12.C.1.2 is amended to set realistic and measureable discharge limits and time limits to attain them.	<ul style="list-style-type: none"> Oppose Schedule 16 as consider them unachievable. Not aware of treatment system that would achieve limits. No means to collect non-point source discharges. Rule not practical or possible. Rule would push us too consent. Poses significant risk to ongoing farm viability.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 207 ref. 99</i>		<ul style="list-style-type: none"> Difficult to monitor and enforce due to differing performance of catchments following rainfall. Farmers may not know if they are complying or not at a particular time. More technical robustness needed.
Dunedin City Council	211	Amend	In combination with amendments to Schedule 16, that Rule	<ul style="list-style-type: none"> Opposed as references Schedule 16.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			12.C.1.2 is revised to make the location of compliance clear and practicable, and that any limits are revised to be appropriate.	<ul style="list-style-type: none"> • Overall effect is discharges will be prohibited as will not meet limits. • Will have significant social, cultural and economic effects on the community. • Practicalities of assessing compliance, likely impossible. • Concerned with potential precedent of setting unattainable limits.
Strath Taieri Community Board	1029	Support submission 211 ref. 99		<ul style="list-style-type: none"> • No reason given.
Clutha District Council	1050	Support submission 211 ref. 99		<ul style="list-style-type: none"> • Agree with submissions in relation to discharge rules and prohibited discharges.
Central Otago District Council	1051			
Central Otago Wine Growers Association	1054			
Federated Farmers of New Zealand	1057	Support submission 211 ref. 99		<ul style="list-style-type: none"> • Difficult to monitor and enforce due to differing performance of catchments following rainfall. • Farmers may not know if they are complying or not at a particular time. • More technical robustness needed. • Schedule 16 limits unachievable.
Alliance Group Limited	1060	Support submission 211 ref. 99		<ul style="list-style-type: none"> • 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.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Support in part submission 211 ref. 99		<ul style="list-style-type: none"> • 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.
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"> • Concerned proposed changes could influence management practices. • Restrict amount of nitrogen we use. • Affect potential yields and financial viability.
Federated Farmers of New Zealand	1057	Support submission 212 ref. 99		<ul style="list-style-type: none"> • Concerns with rule workability. • Farmers may breach limits despite taking precautions.
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. Increase and stagger phase in times for achieving limits.	<ul style="list-style-type: none"> • Application timings of nitrogen are critical to achieve good yields. • Heavy rainfall could compromised our position. • Any reduction in yields/gross margin will impact on business. • Insufficient evidence showing direct relationship between N discharges and application under good practice. • Mole and tile drains raises concerns about achievability of limits.
Federated Farmers of New Zealand	1057	Support submission 220 ref. 99		<ul style="list-style-type: none"> • Measures not realistic and don't account for differing regions and systems. • Farmers may breach limits despite taking precautions. • Limits need greater scientific justification.
John Newlands Farming Company	228	Amend	Amend to make allowances for water running onto properties from catchments outside of a property owner's control.	<ul style="list-style-type: none"> • Property has many waterways that only run after significant rainfall and remain so for days. • Concerned we will be penalised for changes to water quality outside of our control.
Federated Farmers of New Zealand	1057	Support submission 228 ref. 99		<ul style="list-style-type: none"> • Rules not practical. • Rule too vague regarding what appropriate mitigation is. • Sediment runoff can occur regardless of land use, unfair to hold landowner accountable when discharge occurs beyond property.
Kawarau Station Limited	232	Amend	Amend to clarify relationship with rule 12.C.0.2.	<ul style="list-style-type: none"> • Clarification on what is permitted in respect to prohibition required.
Michael O'Connor	234	Oppose	Delete 12.C.1.2.	<ul style="list-style-type: none"> • Rain can make runoff last for days.
David Blair	237	Support	General support with reservations. Want ORC to consider other	<ul style="list-style-type: none"> • Consider carrying capacity for sensitive areas.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> • Consider destocking non-performing farmers. • Consider effect of abstraction on concentrating pollutants.
Fonterra Co-operative Group Limited	241	Amend	<p>Change the rule to one that would allow stormwater discharges with no significant adverse effects to be permitted activities.</p> <p>Change the rule to make it clear what clause (ii) applies to. For example, "that" could be replaced by "...where that contaminant or another subsequent contaminant..."</p>	<ul style="list-style-type: none"> • Standards difficult to meet. • Many small discharges would not be justified. • No technical publication justifying standards. • Common practice to specify maximum total suspended solids.
<i>Alliance Group Limited</i>	1060	<i>Support submission 241 ref. 99</i>		<ul style="list-style-type: none"> • <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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 241 ref. 99</i>		<ul style="list-style-type: none"> • <i>Consistent with relief sought by further submitter.</i>
Ravensdown Fertiliser Co-operative Ltd	248	Amend	<p>Supports in principle the permitted activity status of Rule 12.C.1.2, [but] opposes a number of matters and seeks the concerns raised in other parts of this submission regarding the limits set in Schedule 16 and the practicality and costs associated with measuring these limits to be addressed.</p> <p>Amend this rule accordingly (including amendment of water quality limits in Schedule 16).</p> <p>Seeks clarification of the activity status for a discharge of contaminants listed in Schedule 16 should it not comply with Rule 12.C.1.2, and would seek such an activity to be restricted discretionary.</p>	<ul style="list-style-type: none"> • Concerned about achievability of limits and practicality and costs of measuring limits. • Not clear what activity status is for activities that do not comply with rule but appears to default to prohibited which is opposed.
<i>Mr RJ Borst</i>	1034	<i>Support submission 248 ref. 99</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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</i>	1057	<i>Support</i>		<ul style="list-style-type: none"> • <i>Difficult to monitor and enforce due to differing performance of catchments</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 248 ref. 99</i>		<i>following rainfall.</i> <ul style="list-style-type: none"> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Prohibited status inappropriate.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 248 ref. 99</i>		<ul style="list-style-type: none"> • <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>
Sandy Bay Ltd	249	Oppose	Delete rule and investigate further the following issues: - Rainfall as a measure is unenforceable and vague. - Uncertainty about sampling and meeting the requirements of the rule. .	<ul style="list-style-type: none"> • What is 'rain' and who decides? • A sampling method is needed to ensure we are doing what is expected by the ORC. • ORC's water strategy states that easy methods of measuring the discharge are crucial and that new farmer-friendly devices are available to measure discharge quality from land - where are these?
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 249 ref. 99</i>		<ul style="list-style-type: none"> • <i>Doesn't allow for natural variation between rivers or weather events that cause natural turbidity.</i> • <i>Concern with workability.</i> • <i>Needs to be achievable and cost effective.</i>
Meridian Energy Limited	251	Amend	Provide for small scale or minor operational discharges appropriately.	<ul style="list-style-type: none"> • No justification has been given for how values have been established. • No scientific report or economic assessment has been provided. • Difficulties in assessing non-point source discharges where they enter water. • Unsure how ORC will enforce as far as they apply to construction and smaller operational discharges.
<i>Alliance Group Limited</i>	1060	<i>Support submission 251 ref. 99</i>		<ul style="list-style-type: none"> • <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>
New Zealand Fertiliser Manufacturers Research Association Inc	252	Amend	Supports in principle the permitted activity status of Rule 12.C.1.2, [but] opposes a number of matters and seeks the concerns raised in other parts of this submission regarding the limits set in Schedule 16 and the practicality and costs associated with measuring these limits to be addressed. Amend this rule amended accordingly (including amendment of water quality limits in Schedule 16). Clarification of the activity status for a discharge of contaminants listed in Schedule 16 should it not comply with Rule 12.C. 1.2, and would seek such an activity to be restricted discretionary.	<ul style="list-style-type: none"> • Concerned about the achievability of limits and practicality and costs of measuring limits. • Not clear what the activity status is for activities that do not comply with rule but appears to default to prohibited which is opposed.
<i>Mr RJ Borst</i>	1034	<i>Support submission 252 ref. 99</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & 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 & 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 252 ref. 99</i>		<ul style="list-style-type: none"> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Prohibited status inappropriate.</i>
Waitaki Irrigators Collective Limited	257	Amend	<p>Change rain to "precipitation" to take into account snow, hail and so on or amend the rule so that discharges are measured during median flows, as originally proposed.</p> <p>A better definition of water should be provided, so that it clearly does not include confined water such as a puddle.</p> <p>Clarification of the activity status of discharges which do not meet the limits provided in the rule.</p>	<ul style="list-style-type: none"> • 12 hours not realistic timeframe, water can take days to move through system. • Lacks clarity around ability to get resource consent.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 257 ref. 99</i>		<ul style="list-style-type: none"> • <i>Change in terminology will aid use.</i> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Need provision for reasonable mixing.</i>
North Otago Irrigation Company	260	Amend	<p>Rule 12.C.1.2 is amended to ' . . . providing that during median environmental conditions the quantity of contaminant in the discharge does not exceed the limits given in Schedule 16 (as modified), where the discharge is about to enter water', as originally proposed.</p>	<ul style="list-style-type: none"> • Is reasonably comfortable with concept of where a discharge is about to enter "water" • Discharges should be measured during 'median' environmental conditions. • Can't take compliance action just because water does not meet Table 15.2, a breaching discharge must be identified. • 12 hour condition is inappropriate.
<i>John Webster</i>	1063	<i>Support submission 260 ref. 99</i>		<ul style="list-style-type: none"> • <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. 99</i>		<ul style="list-style-type: none"> • <i>Support the NOIC submission in full.</i>
Ballance Agri-Nutrients Ltd	262	Amend	<p>Supports in principle the permitted activity status of Rule 12.C.1.2, [but] opposes a number of matters and seeks the concerns raised in other parts of this submission regarding the limits set in Schedule 16 and the practicality and costs associated with measuring these limits to be addressed.</p> <p>Amend this rule amended accordingly (including amendment of water quality limits in Schedule 16).</p> <p>Clarification of the activity status for a discharge of contaminants</p>	<ul style="list-style-type: none"> • Concerned about achievability of limits and practicality and costs of measuring limits. • Not clear what activity status is for activities that do not comply with rule but appears to default to prohibited which is opposed.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			listed in Schedule 16 should it not comply with Rule 12.C. 1.2, and would seek such an activity to be restricted discretionary.	
<i>Mr RJ Borst</i>	1034	<i>Support submission 262 ref. 99</i>		<ul style="list-style-type: none"> • <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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & 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. 99</i>		<ul style="list-style-type: none"> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Prohibited status inappropriate.</i>
<i>Alliance Group Limited</i>	1060	<i>Support submission 262 ref. 99</i>		<ul style="list-style-type: none"> • <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.1.2 in its present form.	<ul style="list-style-type: none"> • Discharge limits should be permitted, provided development controls are met. • Rule most appropriate method to achieve objectives and policies, and best meets purpose of the RMA.
4650 Matarae Station Ltd	264	Amend	Changes to rule 12.C.1.2. More than 12 hours of rain cessation is needed before water samples are taken if flooding is still occurring.	<ul style="list-style-type: none"> • Can still be raining in upstream catchment 12 hours after raining ceased, causing flooding and excess sediment and nutrient downstream. • Rule scrapped or samples not taken until all weather causing flooding has ceased.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support in part submission 264 ref. 99</i>		<ul style="list-style-type: none"> • <i>Extensions to 12 hour timeframe needed.</i> • <i>Difficult to monitor and enforce due to differing performance of catchments following rainfall.</i> • <i>Farmers may not know if they are complying or not at a particular time.</i> • <i>More technical robustness needed.</i> • <i>Need provision for reasonable mixing.</i>
Colin Scurr	268	Amend	Clarify the relationship between this rule and rule 12.C.0.5. Amend the timeframe or mechanism to account for catchment dynamics. Delete reference to 'where the discharge is about to enter water'	<ul style="list-style-type: none"> • Unclear how this rule is reconciled with 12.C.0.5. • Unclear at what point the discharge will be measured. • No provision for reasonable mixing. • 12 hour timeframe appears arbitrary.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			and exchange for 'after reasonable mixing'.	
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 268 ref. 99</i>		<ul style="list-style-type: none"> • Difficult to monitor and enforce due to differing performance of catchments following rainfall. • Farmers may not know if they are complying or not at a particular time. • More technical robustness needed.
Horticulture New Zealand	269	Amend	Amend Rule 12.C.1.2 by deleting 'where the discharge is about to enter water' and include after a zone of reasonable mixing and amend the Schedule 16 figures as sought elsewhere in this submission.	<ul style="list-style-type: none"> • Not clear why two rules are required for groundwater (12.C.1.2 and 12.C.1.3). • Discharge of fertiliser would need to be standard and Schedule 16. • Rule unworkable due to uncertainty. Needs to be clear, certain, and achievable. • No guidance on how resource consent would be assessed or what conditions are required to ensure that Schedule 16 is met.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 269 ref. 99</i>		<ul style="list-style-type: none"> • Difficult to monitor and enforce due to differing performance of catchments following rainfall. • Farmers may not know if they are complying or not at a particular time. • More technical robustness needed. • Need provision for reasonable mixing.
<i>Alliance Group Limited</i>	1060	<i>Support submission 269 ref. 99</i>		<ul style="list-style-type: none"> • 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>Etrick Fruitgrowers Association Inc</i>	1067	<i>Support submission 269 ref. 99</i>		<ul style="list-style-type: none"> • Measurement process to establish N level/ha unworkable. • Landuse management not the ORC's role. • Cost to implement the plan change will be huge. • 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.
Forest and Bird	271	Support	<p>Certainty that all water bodies are listed in Schedule 16 and that the limits will lead to all water bodies having good or better water quality and that no parts of water bodies will be down-graded from their current excellent or very good water quality.</p> <p>Certainty that the rule will capture diffuse discharges.</p>	<ul style="list-style-type: none"> • Schedule 16 must set limits on all water bodies. • Limits must lead to improvement of water quality. • Excellent water quality should not be degraded. • Rule must capture diffuse discharges.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 271 ref. 99</i>		<ul style="list-style-type: none"> • Not all waterways need to be enhanced. • Background data required before any agricultural activities are restricted.
<i>Horticulture New Zealand</i>	1032	<i>Oppose in part submission 271 ref. 99</i>		<ul style="list-style-type: none"> • Submitter seeks certainty about the rule capturing diffuse discharges, but doesn't recognise the difficulty in so doing.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 271 ref. 99</i>		<ul style="list-style-type: none"> • Not all waterways need to be enhanced.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & 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 & 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. 99</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Oppose submission 271 ref. 99</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 271 ref. 99</i>		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Federated Farmers of New Zealand	278	Amend	<p>Adopt rule with amendments to Schedule 16.</p> <p>Provide for guidance on where a resource consent will be required where Schedule 16 cannot be met.</p> <p>Include additional wording to the effect of: "Where limits in Schedule 16 are exceeded under this rule a resource consent is required under rule 12.C.2.1."</p> <p>Measurement and assessment of discharges should be more consistent with the statistical water quality regime in the receiving water body and adjusted to ANZECC guidelines.</p>	<ul style="list-style-type: none"> • Support in principle innovative approach to setting limits and measuring them at farm level. • Until farmers gain real understanding of cause and effect, then reduce effects of their activities on water quality, it is critical that objectives, policies and rules achieve link and result in actual change in practice. • Rule difficult to monitor, adequately report and enforce, difficult to know if farmers comply. • Serious reservations about the achievability of limits. • Plan lacks adequate guidance on when resource consent needed. • Measurement and assessment of discharges should be more consistent with the statistical water quality regime in the receiving water body and adjusted to ANZECC guidelines. • Need more confidence in technical robustness of methodology associated with rule, and the measuring points of nutrient loss.
<i>Albert McTainsh</i>	1004	<i>Support submission 278 ref. 99</i>		<ul style="list-style-type: none"> • Practical and workable alternatives, solutions and suggestions.
<i>Hopefield Investments Ltd</i>	1019	<i>Support submission 278 ref. 99</i>		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	<i>Support submission 278 ref. 99</i>		<ul style="list-style-type: none"> • No reason given.
<i>Glenshee Station Limited</i>	1062	<i>Support in part submission 278 ref. 99</i>		<ul style="list-style-type: none"> • 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>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Support in part submission 278 ref. 99</i>		<ul style="list-style-type: none"> • Plan should adopt effects-based approach by controlling contaminants discharged, rather than land use. • Effects-based approach should allow for discharges that exceed Schedule 16 limits.
Fish and Game (Otago)	287	Amend	Review the workability in a practical sense of this rule, and make	<ul style="list-style-type: none"> • Clarification needed on how to decide on measuring point.

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
			amendments to ensure rule is workable and effective.	
New Zealand Fertiliser Manufacturers Research Association Inc (Fert Research)	1010	Support submission 287 ref. 99		<ul style="list-style-type: none"> • Support request to review workability of the rule. • Opposed to Schedule 16 as it is currently proposed.
Craiglea Limited	1012	Oppose submission 287 ref. 99		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality. • Affected by a variety of activities, not just agricultural uses. • Imposes unnecessary constraints on farming practices.
Mr RJ Borst	1034	Oppose submission 287 ref. 99		<ul style="list-style-type: none"> • Not all waterways should have a high standard of water quality.
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			
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 in part submission 287 ref. 99		<ul style="list-style-type: none"> • Doesn't allow for natural variation between rivers or weather events that cause natural turbidity. • Concern with workability. • Needs to be achievable to meet objectives.
DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	1074	Oppose submission 287 ref. 99		<ul style="list-style-type: none"> • Overly restrictive and disproportionate. • Does not take into account economic considerations.
Clydevale Dairy Farms Ltd	297	Amend	Amend rule to provide for reasonable mixing and revisit science behind the timeframe to address variability between catchments and events.	<ul style="list-style-type: none"> • No provision made for mixing. • Unclear where discharge to be measured. • Clarification is required for 12 hour timeframe. • Unclear how it relates to characteristics of a catchment or rainfall. • Rules' relationship with other rules that prohibit discharges is unclear.
Greenfield Farming Ltd	298			
Big River Dairy Limited	299			
Federated Farmers of New Zealand	1057	Support submissions 297 - 299 ref. 99		<ul style="list-style-type: none"> • Difficult to monitor and enforce due to differing performance of catchments following rainfall. • Farmers may not know if they are complying or not at a particular time. • More technical robustness needed. • Need provision for reasonable mixing.
M W Smith	300	Oppose	Oppose.	<ul style="list-style-type: none"> • 12 hour post rain contaminant window is flawed, as it may take more than 12 hours for water to leave/recede • General uncertainty as to what constitutes rain: drizzle, 3 weeks of fog.

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 300 ref. 99</i>		<ul style="list-style-type: none"> • Unclear if can measure water on a paddock before it starts to run. • Difficult to monitor and enforce due to differing performance of catchments following rainfall. • Farmers may not know if they are complying or not at a particular time. • More technical robustness needed. • Need provision for reasonable mixing.
Andrea Clarke	305	Support	Support.	<ul style="list-style-type: none"> • Rule will illustrate importance of considering all environmental aspects to ensure no nutrients enter water. • Climatic conditions and events influence nutrient flows as well as nature of receiving water body. Land needs to be managed to reduce impacts as affected by climatic variance.
The Director-General of Conservation	306	Amend	That 12.C.1.2 be amended as follows, or to like effect: "The discharge of a contaminant and the concentration of it as listed in Schedule 16 (excluding sediment) to: (i) Water; or (ii) Land in a manner that may enter water, is a permitted activity, providing that any discharge does not exceed the limits given in Schedule 16, where the discharge is about to enter water."	<ul style="list-style-type: none"> • No reference to the concentration of specified contaminants which are permitted.
<i>Craiglea Limited</i>	1012	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • No evidence from environmental impacts from agricultural activities. • Changes are vague, unclear and open-ended. • No need for further restrictions on discharges.
<i>Hopefield Investments Ltd</i>	1019	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • 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>Strath Taieri Community Board</i>	1029	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • No reason given.
<i>Horticulture New Zealand</i>	1032	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • Need for provision for a reasonable mixing zone.
<i>Mr RJ Borst</i>	1034	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • 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.
<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 & Mrs SS Burdon</i>	1040			
<i>Mr TE & Mrs JA Craig</i>	1041			
<i>Mr DJ & Mrs JC Andrew</i>	1042			
<i>Macraes Community Incorporated</i>	1043			
<i>Mr GV & Mrs RE Gardner</i>	1044			
<i>Mr AWB Elliot</i>	1045			
<i>Mrs J Hodge</i>	1046			
<i>Mr RP & Mrs RR Van Vught</i>	1047			
<i>Mainland Poultry Limited</i>	1048			
<i>Calder Stewart Industries Limited</i>	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>Moutere Station Limited</i>	1052	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • <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 & 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 & costly consenting if Council cannot monitor and enforce - changes sought require numerous staff to monitor.</i>
<i>Hawkdun Station</i>	1053			
<i>Central Otago Wine Growers Association</i>	1054	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • <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>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • <i>Need to maintain timeframe.</i> • <i>Difficulty in managing concentrations for contaminants.</i>
<i>Alliance Group Limited</i>	1060	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • <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 306 ref. 99</i>		<ul style="list-style-type: none"> • <i>Opposes the support in DoC's submission for reasons in Glenshee's original submission.</i>
<i>Hawkdun Idaburn Irrigation Company Limited</i>	1066	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • <i>Oppose removal of 12 hour limit. Limit is already considered to be too short and its removal is impractical.</i>
<i>DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership</i>	1074	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • <i>Overly restrictive and disproportionate.</i> • <i>Does not take into account economic considerations.</i>
<i>Greenfield Rural Opportunities Limited</i>	1077	<i>Oppose submission 306 ref. 99</i>		<ul style="list-style-type: none"> • <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> • <i>Rules fail relevant tests under section 32 RMA.</i> • <i>Additional controls not justified in terms of effects.</i> • <i>Seek the submission be disallowed.</i>
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"> • <i>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.</i> • <i>Timeframe for compliance is unreasonable due to the large cost for modification of irrigation practices.</i>
<i>Federated Farmers of New</i>	1057	<i>Support in part</i>		<ul style="list-style-type: none"> • <i>Supports ensuring rule achievability and accounting for catchment variation.</i>

Submitter Name/Further Submitter Name	Sub/Fur Sub Number	Position	Decision Requested	Reason for Decision Requested
<i>Zealand</i>		<i>submission 307 ref. 99</i>		
Clutha District Council	308	Amend	Clarify the relationship between this rule and rule 12.C.0.5. Amend the timeframe or mechanism to account for catchment dynamics in a way which is scientifically justified. Delete reference to 'where the discharge is about to enter water' and exchange for 'after reasonable mixing'.	<ul style="list-style-type: none"> Relationship with rule 12.C.0.5 unclear. Unclear at what point the discharge will be measured. No provision for reasonable mixing. Unknown scientific basis is for the 12 hour timeframe.
<i>Contact Energy Limited</i>	1013	<i>Support submission 308 ref. 99</i>		<ul style="list-style-type: none"> Reasons stated in the submission.
<i>Dunedin City Council</i>	1025	<i>Support submission 308 ref. 99</i>		<ul style="list-style-type: none"> No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 308 ref. 99</i>		<ul style="list-style-type: none"> No reason given.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 308 ref. 99</i>		<ul style="list-style-type: none"> Difficult to monitor and enforce due to differing performance of catchments following rainfall. Farmers may not know if they are complying or not at a particular time. More technical robustness needed.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 308 ref. 99</i>		<ul style="list-style-type: none"> Seek that the submission be allowed and the Plan Change amended as per the submission.
Central Otago District Council & Clutha District Council	309	Amend	Clarify the relationship between this rule and rule 12.C.0.5. Amend the timeframe or mechanism to account for catchment dynamics in a way which is scientifically justified. Delete reference to 'where the discharge is about to enter water' and exchange for 'after reasonable mixing'.	<ul style="list-style-type: none"> Relationship with rule 12.C.0.5 unclear. Unclear at what point the discharge will be measured. No provision for reasonable mixing. Unknown scientific basis is for the 12 hour timeframe.
<i>Dunedin City Council</i>	1025	<i>Support submission 309 ref. 99</i>		<ul style="list-style-type: none"> No reasons given.
<i>Strath Taieri Community Board</i>	1029	<i>Support submission 309 ref. 99</i>		<ul style="list-style-type: none"> No reason given.
<i>Horticulture New Zealand</i>	1032	<i>Support in part submission 309 ref. 99</i>		<ul style="list-style-type: none"> Supports provision for reasonable mixing zone.
<i>Central Otago Wine Growers Association</i>	1054	<i>Support submission 309 ref. 99</i>		<ul style="list-style-type: none"> Support that changes prevent effects of discharges being assessed on case by case basis. Agree prohibited status should be removed. Agree permitted rules need to be certain and clear, and activity status of a breach needs to be readily obtainable. Support that reasonable mixing be provided for.
<i>Federated Farmers of New Zealand</i>	1057	<i>Support submission 309 ref. 99</i>		<ul style="list-style-type: none"> Difficult to monitor and enforce due to differing performance of catchments following rainfall. Farmers may not know if they are complying or not at a particular time. More technical robustness needed.
<i>The NZ Transport Agency</i>	1073	<i>Support submission 309 ref. 99</i>		<ul style="list-style-type: none"> Seek that the submission be allowed and the Plan Change amended as per the submission.

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"> • 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	<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"> • Relationship with rule 12.C.0.5 unclear. • Unclear at what point the discharge will be measured. • No provision for reasonable mixing. • Unknown scientific basis is for the 12 hour timeframe.
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. 99</i>		<ul style="list-style-type: none"> • Difficult to monitor and enforce due to differing performance of catchments following rainfall. • Farmers may not know if they are complying or not at a particular time. • More technical robustness needed. • Need provision for reasonable mixing.
<i>Alliance Group Limited</i>	1060	<i>Support submission 323 ref. 99</i>		<ul style="list-style-type: none"> • 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>Glenshee Station Limited</i>	1062	<i>Support in part submission 326 ref. 99</i>		<ul style="list-style-type: none"> • 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.

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"> • Stringent setting of specified limits for discharges will protect water quality.
<i>Federated Farmers of New Zealand</i>	1057	<i>Oppose submission 6 ref. 100</i>		<ul style="list-style-type: none"> • Unworkable, limits not realistic or achievable. • Despite taking precautions farmers may breach limits. • Not appropriate to refer to specific version of Overseer. • Inconsistent with RMA Part II and s107. • Objectives and policies don't support prohibited activity status.
<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"> • Does not allow flexibility for existing farming operations to give effect to the NPS.