

**SUMMARY OF
DECISIONS REQUESTED
(by Submitter)**

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

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



2 June 2012

Preface

Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago was publicly notified on Saturday 31 March 2012 in accordance with Clause 5 of the First Schedule of the Resource Management Act 1991 (RMA).

The Otago Regional Council received a total of 334 submissions on the Proposed Plan Change from a range of groups, organisations and individuals. 328 of these submissions were lodged within the statutory time frame specified, by 5pm on Wednesday 2 May 2012. 6 submissions (numbers 329-334) were received late. Under delegated authority Otago Regional Council has waived the time limit for the 6 late submissions, and not accepted the 3 submissions which were considered to be entirely beyond the scope of the plan change.

In accordance with Clause 7 of the First Schedule of the RMA, this document presents the summary of decisions requested by persons making a submission.

This document summarises the 331 submissions by submitter.

The full original submissions are available for viewing at Otago Regional Council offices and on www.orc.govt.nz

Under Clause 8, Schedule 1 of the RMA, certain persons may make a further submission, but only in support of, or opposition to, those original submissions received. That clause identifies the persons who may make a further submission as:

- (a) Any person representing a relevant aspect of the public interest; or
- (b) Any person that has an interest in the proposed plan change greater than the interest that the general public has.

Further submission forms are available from:

- ORC offices at:
 - 70 Stafford Street, Dunedin
 - William Fraser Building, Dunorling Street, Alexandra
 - The Station, First Floor, Cnr Shotover and Camp Streets, Queenstown
- City and district council offices throughout Otago
- www.orc.govt.nz
- By phoning 0800 474 082; or
- By emailing policy@orc.govt.nz.

Further submissions must state whether you support or oppose an original submission, and whether or not you wish to be heard on your further submission. A copy of your further submission must be served on the original submitter within five working days of making the further submission to the Otago Regional Council.

Further submissions must be received at the Otago Regional Council by 5pm, Monday 18 June 2012.

Guide to Making a Further Submission

Important Information:

Under Clause 8, Schedule 1 of the Resource Management Act 1991, you may make a further submission if you are:

- (a) A person representing a relevant aspect of the public interest; or
- (b) A person that has an interest in the proposed plan change greater than the interest that the general public has.

A further submission may only be made in support of, or in opposition to an original submission. A further submission must state whether you support or oppose an original submission (or part thereof) and whether or not you wish to be heard on your further submission.

A copy of your further submission must be served on the original submitter to which your further submission relates, within five working days of making your further submission to the Otago Regional Council.

The Summary of Decisions Requested summarises the submissions received. If you intend to make a further submission, it is recommended that you read the full original submission, available for viewing at Otago Regional Council offices and www.orc.govt.nz

Please use the **Submitter Number and Reference Number** to clearly state what *submission point* you are referring to e.g. [submitter number / reference number].

This number is shown on the Summary of Decisions Requested by submitter (left) and by provision (right).

e.g. [53/13]

53 (name)

Ref
13

13 (provision)

Submitter Name	Sub Number
(name)	53

Clearly state whether you support or oppose the decision requested you are making a further submission on.

Give the reasons for your support or opposition.

Use the Further Submission Form to help you set out your further submission.

It is in your best interests to make your further submission as clear as possible.

If you have any questions regarding how to prepare a further submission, please phone the Policy Team on 0800 474 082, email policy@orc.govt.nz or look online at www.mfe.govt.nz.

Index to Submitters – By Name

Surname, First Name <u>or</u> Organisation	Submitter Number	Surname, First Name <u>or</u> Organisation	Submitter Number
4650 Matarae Station Ltd	264	Clutha District Council	308
Adams, H F	55	Clyde Dairy Farm Ltd	196
Alliance Group Limited	187	Clydevale Dairy Farms Ltd	297
ALT Holdings LTD	274	Cocks, Alastair	334
Amende, Deanne & Steve	205	Cole, Stephen	8
Anderson, AJ & AJ	120	Cone, Alan G & Bagrie, Judy	38
Anderson, Hamish	221	Constance, Helen	2
Anderson, N	231	Contact Energy Limited	284
APS Heckler Family Trust	218	Cooper, Sarah	112
B Landreth Ltd	253	Corboy, Paul	94
Bagrie, Judy & Cone, Alan G	38	Corona Farms Ltd	155
Ballance Agri-Nutrients Ltd	262	Coutts, Sue	281
Barlow, John	198	Crawford, Paul	80
Beaton Family	291	Crawford, Stephen	73
Belmont	129	Cross Family Trusts	77
Big River Dairy Limited	299	Cruickshank, Neil Douglas	23
Bisson, Jeremy	223	Crutchley, GR	42
Black, Gilbert	179	Dairy Holdings Limited	195
Blair, David	237	Dairy NZ Limited	146
Blakely Pacific Limited	209	Davies, Simon	72
Blumden, Clive	99	de Geest, Nigel	157
Booth, Gerard	159	Deans, Peter & Deans, Graham	63
Borrie, Peter	69	Deer Industry New Zealand	293
Borst, Robert	322	DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	263
Botting, David	97	Diedrichs, Barry	176
Boyes, Des	47	DJ & JC Andrew & the DJ Andrew Family Trust & Partnership	315
Bradfield, Grant	131	Douglas, Clyde	266
Braemorn Farm Ltd	81	Downing, CJ	27
Bryant, Ian	199	Dulce-Domum Trust	235
Burgess, Barry John	66	Dunedin City Council (Water and Waste Services)	211
Burgess, Gerald	65	Dunedin International Airport Limited	323
Butler, Graham	216	Dunje, Dawn	168
Cain, Mark	91	Edwards, Lydia	25
Calder Stewart Industries Limited	313	Elderslie Dairy Farms Limited	115
Cardrona Land Care Group	286	Elliot, AWB	324
Central Otago District Council & Clutha District Council	309	Environmental Defence Society	267
Central Otago Environmental Society Inc	233	Ernslaw One Ltd	149
Chapman-Cohen, Angus	9	Evans, G	67
City Forests Limited	283	Ewing Farms Ltd & Haddington Farms Ltd	177
Clarke, Andrea	305	Federated Farmers of New Zealand	278
Clutha Agricultural Development Board	139	Finlay Family Trust	125

Surname, First Name or Organisation	Submitter Number	Surname, First Name or Organisation	Submitter Number
Fish and Game (Central South Island)	273	Holcim (New Zealand)	224
Fish and Game (Otago)	287	Hollamby, Bob	117
Fonterra Co-operative Group Limited	241	Hollis, Melvyn	53
Ford, Martin	5	Homestead Farm Limited	316
Forest and Bird	271	Hopefield Investments Ltd (C Cochrane)	45
Forest Range Ltd	240	Hopefield Investments Ltd (R Griffiths)	200
Fox, Barry	110	Hopgood, Eric	74
Fox, Ray	89	Horticulture New Zealand	269
Fox, Roger	82	Hubbard, Terisha	181
Foxhaven Farms Ltd	135	Hughes, Tony	170
Fulton Hogan Limited	222	Hunt, Phillip	60
GB & RE Gardner Partnership	318	Hunter Valley Station Ltd	166
Geddes, G & S	50	Hunter, Graham & Pam	332
George, Peter	172	Invernia Holdings Ltd	83
Gibson, Jim	165	Irrigation New Zealand Incorporated	202
Gilmour, Cath	128	Isbister Farms Limited	123
Glen Ayr Ltd (D & C Dundass)	76	Isbister, Graeme	43
Glen Dene Limited	310	Isbister, Grant	151
Glenayr Ltd (D & D Sangster)	59	Jackson, Andrew	132
Glenorchy Branch of Lakes Landcare	40	James, Phil	111
Glenshee Station Limited (Marks & Mouat)	148	Janefield Farm	296
Glenshee Station Ltd (P Hore)	102	JN & JM Lawson Family Trust	171
Graham, Ben	311	John Newlands Farming Company	228
Grant, N O	239	Kane, Sam	161
Graves, AL	31	Kawarau Station Limited	232
Graylands Farms Ltd	302	Kearney, Kaye	16
Green Party (Dunedin Branch)	62	Keep, Graham A	108
Green, Mrs I	14	Kerr, Vivienne & Greg	213
Greenfield Farming Ltd	298	Kingan, Bob	190
Greer Farms Partnerships	314	Kingsbury, Mark	277
Groundwater, Daniel	107	Kington, Melvyn John	84
Guy, Karl	276	Kintyre Farms 2008 Ltd	90
Hamilton, WL	144	Kirkland, Allan	303
Hawea Community Association	126	Kitson, Niere	174
Hawkdun Idaburn Irrigation Company Ltd	70	Korteweg Family Trust	142
Hay, Ross	173	Kyeburn Pastoral Company Ltd	326
Hayes, SA	118	LAC Property Trust	258
Hayward, Steve	44	Lake Edge Farms Ltd	333
Henderson, Duncan	100	Lakes Landcare	210
Hewett Farm Ltd	39	Latta, John	162
Hill, JR	178	Lee, John & Pezaro, Dennis	254
Hill, Lynne	35	Locharburn Grazing Company	217
Hogg, Graeme & Jane	265	Loganbrae Ltd	75

Surname, First Name or Organisation	Submitter Number	Surname, First Name or Organisation	Submitter Number
Lone Star Farms Ltd	327	Mulholland, CP	58
Lovells Creek Farm Ltd	189	Munro, EJ	29
Lower Waitaki Irrigation Company	106	Neeley, Eloise	141
Lowery, Rex & Penny	193	New Zealand Fertiliser Manufacturers Research Association Inc	252
Ludemann, Grant	191	New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	282
Luxmore Dairies	7	New Zealand Pork Industry Board	145
Lynch, Bernard	261	North Otago Irrigation Company	260
Macgregor, Alan Grant	215	North Otago Vegetable and Growers Association	54
Mackie, David John	33	Northburn Limited	307
Macraes Community Incorporated	319	NZ Agricultural Aviation Association	204
MacTavish, Dugald	294	NZ Transport Agency	203
Mainland Poultry Limited	320	O'Brien, Lauren	229
Manley, JH	22	Oceana Gold (New Zealand) Limited	285
Mann, Sydney	169	O'Connor, Michael	234
Marsh, Wayne & Billee	37	Oliver, Jim	18
Martin, Paul	20	Otago Commercial Fishing Sector	246
Matuanui Ltd	163	Otago Conservation Board	140
McCurdy, Andrew	6	Otago Rock Lobster Industry Organisation	243
McDonald, Mrs Marie C	15	Otago Water Resource User Group (OWRUG)	292
McGettigan, Patrick Alexander	34	Oughton, John	109
MCHolland Farming Ltd	207	Parks, Marianne & Michael	51
McKenzie, John	87	Parks, Simon	325
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
Medical Students For Global Awareness	227	PGG Wrightson	119
Meikle, Trevor	96	Philip, Rod	242
Meridian Energy Limited	251	Philpott, BR	71
Michelle, Travis	321	Pile, William John	301
Milne, Kelvin	13	Pioneer Generation	147
Mitchell & Webster Ltd	186	PJ & AM Neame Ltd	137
Mitchell, MB & JA	134	Plunket, Richard	245
Mitchell, Zoe	21	Poplar Grove Station Ltd	208
ML & PJ Lord Family Trust	143	PR Lyders Trust	28
Morrison, Stewart	116	Preserve Our Water Society Inc	225
Mosgiel Taieri Community Board	46	Providence Farm 2007 Ltd	64
Mount Gowrie Station	136	Quambatook Ltd	182
Mt Aspiring Station	127	Queenstown Lakes District Council	255

Surname, First Name or Organisation	Submitter Number	Surname, First Name or Organisation	Submitter Number
R & M Borrie Ltd	331	Strath Taieri Community Board	164
Ramsay, Greg & Stott, G	68	Strathburn Limited	130
Ranui Partnership	158	Streeter, Kate	184
Raughan, CC & GA	236	Stuart, Annie	280
Ravensdown Fertiliser Co-operative Ltd	248	Sunset Dairy Limited & van Vugt, Rob	317
Rawle, Colin	4	T A Whiteside & Co Ltd	212
Rawlinson, Michael	121	Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	197
Rayonier New Zealand Ltd	256	Telford, Ken	272
Rees Valley Station Limited	41	Teviot Irrigation Company Limited	114
Richardson, Andrew & Barbara	156	The Cow Farm Limited	133
Rillstone, Dougal	201	The Director-General of Conservation	306
Rimu Downs Ltd	219	Thomas, WH	10
River-Estuary Care: Waikouaiti-Karitane	79	Thompson, Jeff & Alison	78
Robertson, JP	52	Three Creeks Farm Ltd	56
Rowland, Peter	328	Tisdall, Raymond Grant	188
Rowley Family	230	Trevathan, NG & Trevathan, MA	86
Rudduck, Fiona	113	Trust for the estate of WJ Johnston	152
Run 248m Ltd	153	Trustpower Limited	206
Rutherford, Alastair	105	University of Otago, Department of Zoology	57
Sandy Bay Ltd	249	Val Ridge Farm Ltd	98
Sargeant, Tami and Jason	24	van Vugt, Rob & Sunset Dairy Limited	317
Schallenberg, Marc	270	Verbakel, AJ & TT	93
Scott, Donald	30	Viewmont Limited	247
Scurr, Colin	268	Waihemo Water Catchment Society Inc	250
Scurr, TM and CM	275	Waitaki District Council	138
SH Andrews and Sons Ltd	61	Waitaki Irrigators Collective Limited	257
Shag Valley Station	36	Waitensea Ltd	290
Shalloch Farms Ltd	154	Wales, Jeremy	194
Shaw, Dave	226	Wallace, Ross & Alexa	101
Sheat, Ronald	330	Watt, James	167
Shennan, Marianne	11	Waverley Downs Ltd	220
Silver Fern Farms Limited	238	Wenita Forest Products	279
Smale, Dan	180	Werner, Craig	48
Smith, B & J	259	Wharton, David	3
Smith, M W	300	Williams, Richard	329
Smith, Neil	295	Williams, Barry	12
Sopson, Logan	175	Williams, Edna & Thomas	1
Southern District Health Board	103	Willowview Pastures Ltd	214
Southern Wood Council	289	Wilson, Alan L	88
Spooner, Jeanette	32	Wilson, P, H & G	304
Stanger, Trevor	183	Wilson, Roy A	49
Starke, J	17	Windsor Park Dairies Ltd	185
Stott, G & Ramsay, Greg	68	Wyllies Crossing Limited	312
Strachan, Wallace Evan	95	Young, Jane	124

Index to Submitters – By Number

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
1	Williams, Edna & Thomas	16 Hall Street, Mosgiel 9024
2	Constance, Helen	PO Box 9050, Dunedin 9047
3	Wharton, David	4F Clayton Street, St Clair, Dunedin 9012
4	Rawle, Colin	C/- colinhr@ihug.co.nz
5	Ford, Martin	15 Miro Street, Kaka Point, RD1, Balclutha
6	McCurdy, Andrew	1 Monowai Street, Ravenbourne, Dunedin 9022
7	Luxmore Dairies	186 Webb Road, Waipahi, RD1, Gore 9771
8	Cole, Stephen	481 Ardmore Rd, RD2, Tapanui 9587
9	Chapman-Cohen, Angus	Lindis Downs, PO Box 21, Tarras 9341
10	Thomas, WH	25 Sunshine Lane, Musselburgh, Dunedin 9013
11	Shennan, Marianne	2 MacNee Street, Mornington, Dunedin
12	Williams, Barry	PO Box 31, Middlemarch
13	Milne, Kelvin	53 Earls Road, Saint Clair, Dunedin
14	Green, Mrs I	26 Stour Street, Oamaru 9400
15	McDonald, Mrs Marie C	95A Aln Street, Oamaru 9400
16	Kearney, Kaye	11 Jollys Road, Cromwell 9310
17	Starke, J	14 David Street, Caversham, Dunedin
18	Oliver, Jim	2 Cherry Grove, Alexandra 9320
19	Penny, FR & R	10A Earnscleugh Road, Alexandra
20	Martin, Paul	390 North Road, North East Valley, Dunedin 9010
21	Mitchell, Zoe	69 Greig Street, Broad Bay, Dunedin
22	Manley, JH	33 Tyne Street, Mosgiel, Dunedin 9024
23	Cruikshank, Neil Douglas	15a Kenmure Street, Alexandra 9320
24	Sargeant, Tami and Jason	469 Highgate, Maori Hill, Dunedin 9010
25	Edwards, Lydia	14 Wairoa Street, Wakari, Dunedin 9010
26	Pennycuick, Nina	54 Tyne Street, South Hill, Oamaru 9400
27	Downing, CJ	4 Beverley Place, Shiel Hill, Dunedin 9010
28	PR Lyders Trust	C/- DW Lyders, 53 McPherson Road, Berwick, No. 1 RD, Outram 9073
29	Munro, EJ	986 Brighton Road, Dunedin 9018
30	Scott, Donald	55 Riccarton Road, Mosgiel 9024
31	Graves, AL	132 Ashworth Street, Alexandra 9320
32	Spooner, Jeanette	41 Scarba Street, Roslyn, Dunedin 9010
33	Mackie, David John	Kuriwao Homestead, 56 Hillfoot Road, RD 2, Clinton 9584
34	McGettigan, Patrick Alexander	1 Killarney Street, Alexandra 9320
35	Hill, Lynne	1 Aitken Place, Mosgiel 9024
36	Shag Valley Station	C/- Johnny Bell , 2353 Dunback / Morrisons Road, 3RD, Palmerston 9483
37	Marsh, Wayne & Billee	Maori Point Road, Lindis Crossing, PO Box 20, Tarras 0347
38	Cone, Alan G & Bagrie, Judy	Hanging Rock, RD 12 Pleasant Point, South Canterbury 7982
39	Hewett Farm Ltd	C/- Rob Hewett, 1233 Manuka Gorge Highway, South Otago, Lawrence 9593
40	Glenorchy Branch of Lakes Landcare	C/- Iris Scott, Rees Valley Station, Glenorchy 9372
41	Rees Valley Station Limited	C/- Kate and Iris Scott, Rees Valley Station, Glenorchy 9372
42	Crutchley, GR	1838 Puketoi Highfield Road, RD4, Ranfurly
43	Isbister, Graeme	Totara, 18 DRD, Oamaru 9192
44	Hayward, Steve	109 Glenpark Ave, Maryhill, Dunedin 9011

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
45	Hopefield Investments Ltd (C Cochrane)	C/- Clive Cochrane, 129 Clyde Street, Balclutha 9230
46	Mosgiel Taieri Community Board	C/- Bill Feather, PO Box 5045, Dunedin 9058
47	Boyes, Des	371 Pine Hill Road, Liberton, Dunedin 9010
48	Werner, Craig	30 Howard Street, Macandrew Bay, Dunedin 9014
49	Wilson, Roy A	29B Gordon Road, Mosgiel
50	Geddes, G & S	C/- glenbrae@scorchotago.co.nz
51	Parks, Marianne & Michael	109 Mathesons Corner Road, RD 2, Tapanui
52	Robertson, JP	The Larches, RD1, Wanaka 9831
53	Hollis, Melvyn	63 Stirling Crescent, Mosgiel 9024
54	North Otago Vegetable and Growers Association	C/- Graeme Ormandy, 5 O R D, Oamaru
55	Adams, H F	57 Kauri Street, Dunedin 9022
56	Three Creeks Farm Ltd	C/- IM & JA Isbister, 63 Ardgowan Road, 1 DRD, Oamaru
57	University of Otago, Department of Zoology	C/- Dr Christoph Matthaei, PO Box 56, Dunedin 9054
58	Mulholland, CP	Rapid 969 Ranfurly Patearoa Road, RD4, Central Otago 9398
59	Glenayr Ltd (D & D Sangster)	C/- D & D Sangster, Glenfield, RD4, Ranfurly 9398
60	Hunt, Phillip	Fork Farm, 100 Maungawera Road, 2 RD, Wanaka
61	SH Andrews and Sons Ltd	C/- John Andrews, Waipiata, RD3, Ranfurly
62	Green Party (Dunedin Branch)	C/- shane.montague-gallagher@otago.ac.nz
63	Deans, Peter & Deans, Graham	1223 Owaka Valley Road, Owaka
64	Providence Farm 2007 Ltd	C/- PL Finlay, 15 K RD, Oamaru 9494
65	Burgess, Gerald	1207 Hunt Road, Awatea RD2, Owaka 9586
66	Burgess, Barry John	723 Purakaunui Falls Road, Owaka
67	Evans, G	389 Barrs Falls Road, RD2, Owaka
68	Ramsay, Greg & Stott, G	RD2, Owaka 9586
69	Borrie, Peter	Posthill, 15 K R D, Oamaru 9494
70	Hawkdun Idaburn Irrigation Company Ltd	C/- GF Dowling, RD3, Ranfurly 9396
71	Philpott, BR	223 Morgan Road, RD2, Milton 9292
72	Davies, Simon	1296 Coast Road, RD2, Milton 9292
73	Crawford, Stephen	126 Lambourne Road, Kilmore Farm, RD4, Balclutha 9274
74	Hopgood, Eric	41 Meadowstone Drive, Wanaka
75	Loganbrae Ltd	C/- Peter Aitken, Loganbrae, Ranfurly Road, Central Otago
76	Glen Ayr Ltd (D & C Dundass)	C/- Drew & Carolyn Dundass, 917 Upper Taieri Paerau Runs Road, RD4 Paerau, Ranfurly 9398
77	Cross Family Trusts	C/- William Harrington, 16 Herbs Place, Christchurch
78	Thompson, Jeff & Alison	Collie Downs, 397 Whitstone-Five Forks Road, RD 16D, Oamaru 9492
79	River-Estuary Care: Waikouaiti-Karitane	C/- Patricia Vanderburg, 47 Coast Road, Karitane 9440
80	Crawford, Paul	637 Clifton Road, RD3, Balclutha
81	Braemorn Farm Ltd	C/- C R & D J Mavor, 2 DRD, Airdale, Oamaru 9492
82	Fox, Roger	13 DRD, Oamaru
83	Invernia Holdings Ltd	C/- Russell Hurst, 4 K RD, Oamaru 9494
84	Kington, Melvyn John	129 Oamaru Creek Road, 3 D RD, Oamaru 9492
85	Petrie, Tim	Grande-Vue 403 Airedale Road, RD 5D, Weston, Oamaru
86	Trevathan, NG & Trevathan, MA	Lindisvale, 3 RD, Cromwell 9383
87	McKenzie, John	1 C RD, Oamaru 9194
88	Wilson, Alan L	120 Waikoata Valley Road, Owaka

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
89	Fox, Ray	203 Rosebery Road, 1 D RD, Oamaru 9192
90	Kintyre Farms 2008 Ltd	C/- M C Paterson & J R C Paterson, 17 Paerau Road, 4 RD, Ranfurly 9398
91	Cain, Mark	309 Waimotu Road, RD 6O, Oamaru 9495
92	Paton, ED	211 Whitstone Road, RD 16D, Oamaru 9492
93	Verbakel, AJ & TT	329 State Highway 83, Oamaru 9494
94	Corboy, Paul	Skilbister Farm, RD1, Milton 9291
95	Strachan, Wallace Evan	15 KRD, Oamaru 9494
96	Meikle, Trevor	Carnwath, 406 Devils Bridge Road, 2 D RD, Oamaru 9492
97	Botting, David	Blaindale, RD3, Tehouka, Balclutha
98	Val Ridge Farm Ltd	C/- Clayton Buckley, 284 Carrs Road, Loburn
99	Blumden, Clive	437 Island Stream Road, 10 D RD, Oamaru 9492
100	Henderson, Duncan	Happy Valley Station, 302 Hawksburn Road, RD2 Bannockburn, Cromwell 9384
101	Wallace, Ross & Alexa	182 Beacon Hill Road, Waipahi, RD1, Gore 9771
102	Glenshee Station Ltd (P Hore)	C/- Peter Hore, Corniog Farm, PO Box 7, Wedderburn 9355
103	Southern District Health Board	C/- Gillian Anderson, Private Bag 1921, Dunedin 9054
104	McMillan, Alan	19 Haggart Street, RD2 Wingatui, Mosgiel
105	Rutherford, Alastair	The Point, RD3, Cromwell 9893
106	Lower Waitaki Irrigation Company	C/- Mr Chris Dennison, 3 HRD, Oamaru 9493
107	Groundwater, Daniel	12 Parklare Place, Weston, Oamaru
108	Keep, Graham A	62 Perth Street, Oamaru 9400
109	Oughton, John	12 Otter Street, Oamaru 9400
110	Fox, Barry	1 Gordon Street, Weston, Oamaru
111	James, Phil	100 Shortland Road, 1 KRD, Oamaru
112	Cooper, Sarah	4 Nun Street, 8 O RD, Herbert
113	Rudduck, Fiona	53 Till Street, Oamaru 9400
114	Teviot Irrigation Company Limited	C/- Ralph Nichol, 139 Woodhouse Road, RD1, Roxburgh 9571
115	Elderslie Dairy Farms Limited	C/- Andrew Jeffries, 84 Elderslie Road, RD 2C, Oamaru 9491
116	Morrison, Stewart	242 Riverside Road, RD1 Inch Clutha, Kaitangata 9281
117	Hollamby, Bob	5 H RD, Oamaru 9493
118	Hayes, SA	228 Steward Road, 4 H RD, Oamaru 9493
119	PGG Wrightson	C/- Neville Langrish, PO Box 24, Oamaru 9444
120	Anderson, AJ & AJ	6A Hart Street, Belleknowes, Dunedin 9011
121	Rawlinson, Michael	1 Dalkeith Street, North East Valley, Dunedin 9010
122	McTainsh, Albert	Tahakopa Valley Road, RD2, Owaka 9586
123	Isbister Farms Limited	C/- Lyndon & Jane Strang, 67 Dunrobin Road, 14C RD Five Forks, Oamaru
124	Young, Jane	PO Box 32, Owaka 9546
125	Finlay Family Trust	185 Gibson Road, 15K RD, Oamaru 9494
126	Hawea Community Association	C/- Rachel Brown, 109 Loess Lane, RD2, Wanaka
127	Mt Aspiring Station	C/- Randall Aspinall, Box 94, Wanaka 9343
128	Gilmour, Cath	19 Willow Place, Queenstown 9300
129	Belmont	C/- John & Wendy Dodd, 51 Dodds Road, 13 C RD, Oamaru 9491
130	Strathburn Limited	C/- Callum Wilson, 545 Gladbrook Road, Middlemarch 9597
131	Bradfield, Grant	83 Forsyth Road, 2 RD, Owaka 9586
132	Jackson, Andrew	285 Farquhar Road, 2 RD, Owaka 9586
133	The Cow Farm Limited	C/- G Scott, 38 Marsh Road, Etrick RD2, Roxburgh 9572
134	Mitchell, MB & JA	7 Hurst Rd, RD2, Gore 9772

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
135	Foxhaven Farms Ltd	C/- , Tony Fox, 107 Brockmans Rd, Airedale, Oamaru
136	Mount Gowrie Station	C/- James Macdonald, Clarks Junction-Sutton, SH87, RD2, Outram
137	PJ & AM Neame Ltd	C/- Philip Neame, 1862 Clinton Highway, 2RD, Clinton 9584
138	Waitaki District Council	C/- David Campbell, Private Bag 50058, Oamaru 9444
139	Clutha Agricultural Development Board	C/- Malcolm Deverson, 6 John Street, PO Box 149, Balclutha
140	Otago Conservation Board	C/- Mark Clark, Box 5244, Dunedin 9058
141	Neeley, Eloise	PO Box 137, Balclutha 9240
142	Korteweg Family Trust	C/- Stephen and Rhonda Korteweg, 237 The Crescent Road, Kaitangata 9281
143	ML & PJ Lord Family Trust	C/- Mike Lord, 330 Marshall Road, 1 RD, Outram, Dunedin 9073
144	Hamilton, WL	68 Tilverstowe Road, RD7C, Oamaru 9491
145	New Zealand Pork Industry Board	C/- Jaye Hill, Massey University (IFNHH), Private Bag 1122, Palmerston North 4442
146	Dairy NZ Limited	C- James Ryan, PO Box 160, Lincoln University 7647
147	Pioneer Generation	C/- Tony Jack, Ellis Street, PO Box 275, Alexandra 9340
148	Glenshee Station Limited (Marks & Mouat)	C/- Goodman Tavendale Reid, PO Box 442, Christchurch 8140
149	Ernslaw One Ltd	C/- Peter Weir, PO Box 36, Tapanui
150	McNeilly, Dean	14 McSkimming Lane, RD2, Balclutha
151	Isbister, Grant	4D RD Oamaru, Oamaru
152	Trust for the estate of WJ Johnston	C/- William (Bill) Johnston, Clifton Falls, 33 Dunrobin Road, RD 15C, Five Forks, Oamaru 9491
153	Run 248m Ltd	C/- Robin Malcolm Lawrence, PO Box 179, Greymouth 7804
154	Shalloch Farms Ltd	C/- Neil Hamilton, 287 Gibson Road, 3KRD, Oamaru 9494
155	Corona Farms Ltd	C/- Corrie & Donna Smit, 46 Otakiri Road, RD2, Whakatane 3192
156	Richardson, Andrew & Barbara	498 McPhersons Rd, RD2K, Oamaru
157	de Geest, Nigel	PO Box 222, Oamaru 9444
158	Ranui Partnership	C/- James Becker, Patearoa, RD4, Ranfurly 9398
159	Booth, Gerard	141 Round Hill Road, RD19D, Oamaru 9492
160	McNamara, Ruth	104 Russell Street, Alexandra 9320
161	Kane, Sam	359 Luggate Tarras Road, RD3, Cromwell
162	Latta, John	2329 Owaka Valley Road, South Otago, Otago 9586
163	Matuanui Ltd	C/- Nathan & Linda Wilson, Matuanui Farm RD1, Balclutha 9271
164	Strath Taieri Community Board	C/- Barry Williams, Dunedin City Council, PO Box 5045, Dunedin 9058
165	Gibson, Jim	15 K RD, Oamaru 9494
166	Hunter Valley Station Ltd	C/- D M Cochrane, Hunter Valley Station, Private Bag 9005, Wanaka 9343
167	Watt, James	86 Hickey Road, Waipahi, RD1, Gore
168	Dunjey, Dawn	18 CRD, Oamaru 9491
169	Mann, Sydney	25 Turnbull Street, Brockville, Dunedin 9011
170	Hughes, Tony	175 Kaka Point Road, RD1, Balclutha 9271
171	JN & JM Lawson Family Trust	C/- Jim Lawson, 192 Steep Hill Road, Waikouaiti 9471
172	George, Peter	36 Panmure Avenue, Dunedin 9012
173	Hay, Ross	139 Clareview Road, 12 ORD, Oamaru 9495
174	Kitson, Niere	131 Horse Gully Road, Papakaio, Oamaru 9494
175	Sopson, Logan	109 Eden Street, Oamaru 9400
176	Diedrichs, Barry	389 Alma-Maheno, RD 18C, Oamaru 9491
177	Ewing Farms Ltd & Haddington Farms Ltd	C/- Tony McDonnell, 30 Phosphate Road, Clarendon RD1, Outram 9073
178	Hill, JR	72 Loop Road, N 2RD, Roxburgh

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
179	Black, Gilbert	252 Back Road, RD2, Milton 9292
180	Smale, Dan	Private Bag 50061, Omakau 9352
181	Hubbard, Terisha	248 Hillingdon Street, Normanby, Dunedin 9010
182	Quambatook Ltd	C/- James McNally, 5DRD Currie Road, Oamaru 9495
183	Stanger, Trevor	149 Teaneraki Road, 5DRD, Oamaru 9492
184	Streeter, Kate	581 Grants Road, RD7K, Oamaru 9494
185	Windsor Park Dairies Ltd	C/- Callum Kingan, 900 Weston Ngapara Road, 2CRD, Oamaru 9491
186	Mitchell & Webster Ltd	C/- Jock Webster, Rosedale 5D RD, Oamaru 9492
187	Alliance Group Limited	C/- John Kyle, Mitchell Partnerships, PO Box 489, Dunedin 9054
188	Tisdall, Raymond Grant	452 Gladbrook Road, Middlemarch 9597
189	Lovells Creek Farm Ltd	C/- Bryce Clark, 76 Station Road, Lovells Flat, 2RD Milton 9292
190	Kingan, Bob	294 Parsons Road, 1CRD, Oamaru 9491
191	Ludemann, Grant	635 Burnside Road, 17DRD, Oamaru 9492
192	McNab, Peter	Lochindorb, Katea RD2, Owaka 9586
193	Lowery, Rex & Penny	Tawanui RD2, Owaka
194	Wales, Jeremy	PO Box 4, Roxburgh 9441
195	Dairy Holdings Limited	C/- Ben Williams, Chapman Tripp, PO Box 2510, Christchurch 8140
196	Clyde Dairy Farm Ltd	C/- Dave Inder, 274 Koau Road, Paretai RD1, Balclutha
197	Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga	C/- Tim Vial, KTKO Ltd, PO Box 446, Dunedin 9054
198	Barlow, John	509 Ballantyne Road, Wanaka 9382
199	Bryant, Ian	825 Centre Road, No 1 RD, Outram 9073
200	Hopefield Investments Ltd (R Griffiths)	C/- Robert Raymond Griffiths, 5 Park Lane, Fairfield, Dunedin
201	Rillstone, Dougal	94 Grendon Street, Maori Hill, Dunedin 9010
202	Irrigation New Zealand Incorporated	C/- Andrew Curtis, 6 Sonter Road, Wigram, Christchurch 8042
203	NZ Transport Agency	C/- Denise Anderson, MWH NZ Ltd, PO Box 4, Dunedin 9058
204	NZ Agricultural Aviation Association	C/- John G Sinclair, PO Box 2096, Wellington
205	Amende, Deanne & Steve	Taieri Ferry Road, RD1, Outram 9073
206	Trustpower Limited	C/- Laura Marra, Private Bag 12023, Tauranga
207	MCHolland Farming Ltd	C/- M & C Holland, 437 Waianakarua Road, 13 ORD, Oamaru 9495 AND C/- Frances Lojkine, MWH NZ Ltd, PO Box 4, Dunedin 9054
208	Poplar Grove Station Ltd	C/- Lindsay Geddes, 626 Gladbrook Road, Middlemarch 9597
209	Blakely Pacific Limited	C/- Philip Taylor, PO Box 13980, Christchurch 8141
210	Lakes Landcare	C/- Tim Burden, Mt Burke Station, RD2, Wanaka
211	Dunedin City Council (Water and Waste Services)	C/- Laura McElhone, Dunedin City Council, PO Box 5045, Dunedin 9058 AND C/- Frances Lojkine, MWH NZ Ltd, PO Box 4, Dunedin 9054
212	T A Whiteside & Co Ltd	C/- Craig Whiteside, 232 Waiwera Station Road, RD2, Clinton
213	Kerr, Vivienne & Greg	RD1, Waikouaiti, Otago 9471
214	Willowview Pastures Ltd	C/- Geoff Taylor, 304 Kaik Rd, 5 H R D, Oamaru 9493
215	Macgregor, Alan Grant	159 State Highway 1, 1 KRD, Oamaru
216	Butler, Graham	120 Steward Rd, Oamaru
217	Locharburn Grazing Company	C/- Joyce & Geof Brown, 1764 Luggate Cromwell Road, RD3, Cromwell 9383
218	APS Heckler Family Trust	C/- Sid Heckler, 415 Stoneburn Road, Dunback 3 RD, Palmerston
219	Rimu Downs Ltd	C/- Brett Burgess, 437 Purakaunui Falls Rd, 2 RD, Owaka
220	Waverley Downs Ltd	C/- John Whiteside, No 3 RD, Balclutha

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
221	Anderson, Hamish	Rotoiti Farm, 280 Kaitangata Highway, Stirling 9231
222	Fulton Hogan Limited	C/- Tim Ensor, URS New Zealand Limited, PO Box 4479, Christchurch 8140
223	Bisson, Jeremy	110 McLennan Rd, Hawea Flat RD2, Wanaka 9382
224	Holcim (New Zealand)	C/- Tim Ensor, URS New Zealand Limited, PO Box 4479, Christchurch 8140
225	Preserve Our Water Society Inc	C/- Kim Fogelberg & others, 35 Loach Road, Hawea Flat RD2, Wanaka 9382
226	Shaw, Dave	Emerald Road, Waitahuna West RD 3, Lawrence
227	Medical Students For Global Awareness	C/- Andrew Sise, 4 Drivers Road, Maori Hill, Dunedin
228	John Newlands Farming Company	C/- John Newlands, 33 Newlands Road, 12A DRD, Oamaru 9492
229	O'Brien, Lauren	1027 Highcliff Rd, RD2 Pukehiki, Dunedin 9077
230	Rowley Family	Lake Hawea Station, 2 RD, Wanaka 9382
231	Anderson, N	Branch Creek, Cardrona Valley Road, RD2, Wanaka 9382
232	Kawarau Station Limited	C/- Richard John Anderson, Kawarau Station, 2 RD, Cromwell 9384
233	Central Otago Environmental Society Inc	C/- D G Shattky, 300 Dunstan Creek Rd, RD 2, Omakau 9377
234	O'Connor, Michael	66 McKerrow Road, 11 ORD, Oamaru
235	Dulce-Domum Trust	C/- J F Ironside – Trustee, 45 Bushey Park Road, No 2RD, Palmerston 9482
236	Raughan, CC & GA	Glenomaru, RD 1, Balclutha 9271
237	Blair, David	46 Meridian Street, Port Chalmers, Dunedin 9023
238	Silver Fern Farms Limited	C/- Jo Appleyard/Tania Low, Chapman Tripp, PO Box 2510, Christchurch
239	Grant, N O	RD1 Middlemarch, Dunedin 9596
240	Forest Range Ltd	C/- R & J & D Emmerson, Forest Range Station, PO Box 9, Tarras 9347
241	Fonterra Co-operative Group Limited	C/- Sean Newland, PO Box 417, Wellington 6140
242	Philip, Rod	2 RD, Palmerston
243	Otago Rock Lobster Industry Organisation	C/- Simon Gilmour, 23 Erin Street, Roslyn, Dunedin
244	McLaren, DJ & NA	C/- Donald McLaren, 124 Mercer Road, RD1, Balclutha 9271
245	Plunket, Richard	77 Boundary Creek Road, 1.H.R.D, Oamaru 9493
246	Otago Commercial Fishing Sector	C/- Bill Chisholm, Chisholm Associates, PO Box 2, Omarama 9448
247	Viewmont Limited	C/- A D Newlands, 289 Kauru Hill Road, 12 BDRD Maheno, Oamaru
248	Ravensdown Fertiliser Co-operative Ltd	C/- Chris Hansen, Chris Hansen Consultants Ltd, PO Box 51-282, Tawa, Wellington 5249
249	Sandy Bay Ltd	C/- S B Harrison & J H Weedon, 716 Ahuriri Flat Road, Otekura RD1, Balclutha 9271
250	Waihemo Water Catchment Society Inc	C/- Don McLenaghan, RD3 Dunback, Palmerston 9483
251	Meridian Energy Limited	C/- Andrew Feierabend, PO Box 2454, Christchurch
252	New Zealand Fertiliser Manufacturers Research Association Inc	C/- Greg Sneath, Chris Hansen Consultants Ltd, PO Box 51-282, Tawa, Wellington 5249
253	B Landreth Ltd	C/- Gavin Landreth, 220 Catherwood Road, Katea, Owaka 9546
254	Lee, John & Pezaro, Dennis	PO Box 126, Wanaka 9343
255	Queenstown Lakes District Council	C/- Jonathan Richards, Queenstown Lakes District Council, Private Bag 50072, Queenstown
256	Rayonier New Zealand Ltd	C/- Kelvin Meredith, PO Box 13 285, Tauranga 3141
257	Waitaki Irrigators Collective Limited	C/- Elizabeth Solal, PO Box 159, Oamaru 9444
258	LAC Property Trust	C/- Jan Caunter, Gallaway Cook Allan, PO Box 450, Wanaka 9343
259	Smith, B & J	RD 14-C, Oamaru 9491
260	North Otago Irrigation Company	C/- Robyn Wells, Chief Executive, PO Box 216, Oamaru 9400

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
261	Lynch, Bernard	183 Taieri Rd, Dunedin 9010
262	Ballance Agri-Nutrients Ltd	C/- Nigel Sadler, Private Bag 12503, Tauranga 3143
263	DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership	C/- Robert Enright, DLA Phillips Fox, 22nd Floor, DLA Phillips Fox Tower, 209 Queen St, Auckland 1010
264	4650 Matarae Station Ltd	C/- William Jones, Sutton Clarkes Junction Road, RD 2, Outram 9074
265	Hogg, Graeme & Jane	4 Tuapeka West Rd, Lawrence 9591
266	Douglas, Clyde	388 Kauru Hill Rd, Oamaru 9492
267	Environmental Defence Society	C/- Kelsey Serjeant, 3 Duke St, Northcote Point, Auckland
268	Scurr, Colin	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
269	Horticulture New Zealand	C/- Chris Keenan, PO Box 10 232, Wellington
270	Schallenberg, Marc	58 Gladstone Rd, Dalmore, Dunedin 9010
271	Forest and Bird	C/- Sue Maturin, Box 6230, Dunedin 9016
272	Telford, Ken	27 Telford Road, 2RD, Clinton 9584
273	Fish and Game (Central South Island)	C/- Zella Smith, PO Box 150, Temuka 7948
274	ALT Holdings LTD	C/- Lynnore Templeton, 175 Mt Stoker Road, RD3, Middlemarch 9598
275	Scurr, TM and CM	Tuohys Gully 2127D, Cardrona, Wanaka 2RD 9382
276	Guy, Karl	343 McPhersons Rd, 6H RD, Oamaru
277	Kingsbury, Mark	15 KRD, Oamaru 9494
278	Federated Farmers of New Zealand	C/- Matt Harcombe, PO Box 5242, Dunedin 9058
279	Wenita Forest Products	C/- David Cormack, PO Box 341, Mosgiel, Dunedin
280	Stuart, Annie	37 Duncan St, Dunedin
281	Coutts, Sue	110 McLennan Rd, RD2 Hawea Flat, Wanaka 9382
282	New Zealand Institute of Forestry - Te Putahi Ngaherehere o Aotearoa Incorporated, Otago/Southland Section	C/- Dr Angus McPherson, PO Box 5837, Moray Place, Dunedin 9058
283	City Forests Limited	C/- Peter Oliver, PO Box 210, Dunedin 9054
284	Contact Energy Limited	C/- Rosemary Dixon, PO Box 10-742, Wellington
285	Oceana Gold (New Zealand) Limited	C/- Maree Baker-Galloway, Anderson Lloyd, Private Bag 1959, Dunedin 9054
286	Cardrona Land Care Group	C/- Jan Caunter, Gallaway Cook Allan, PO Box 450, Wanaka 9343
287	Fish and Game (Otago)	C/- Maree Baker-Galloway, Anderson Lloyd, Private Bag 1959, Dunedin AND C/- Peter Wilson, Fish and Game, PO Box 76, Dunedin
288	Paterson Pitts Partners Ltd	C/- Peter Dymock, PO Box 84, Cromwell 9342
289	Southern Wood Council	C/- Grant Dodson, PO Box 904, Dunedin 9054
290	Waitensea Ltd	C/- Jonathan Davis, 12 Clark St, Sumner, Christchurch 8018
291	Beaton Family	C/- Mark Beaton, 1388 Berwick Road, 1 RD, Outram 9073
292	Otago Water Resource User Group (OWRUG)	C/- John Williamson, PO Box 41, Alexandra
293	Deer Industry New Zealand	C/- Tony Pearse, Level 5 Wellington Chambers, 154 Featherston Street, Wellington 6143
294	MacTavish, Dugald	Moeraki, RD 2, Palmerston
295	Smith, Neil	5 HRD, Oamaru
296	Janefield Farm	C/- Ian Bathgate, 295 Nichols Road, 1 RD, Outram
297	Clydevale Dairy Farms Ltd	C/- Alan Cubitt, 11 Bedford Street, St Clair, Dunedin 9012
298	Greenfield Farming Ltd	C/- Alan Cubitt, 11 Bedford Street, St Clair, Dunedin 9012
299	Big River Dairy Limited	C/- Alan Cubitt, 11 Bedford Street, St Clair, Dunedin 9012
300	Smith, M W	27 McDonalds Road, 4H RD, Oamaru 9493
301	Pile, William John	967 Steward Road, RD 6H, Oamaru 9493

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
302	Graylands Farms Ltd	C/- Barry & Liz Gray, 2610 Owaka Highway, RD 2, Owaka 9536
303	Kirkland, Allan	Elm Grove, RD2, Mosgiel 9092
304	Wilson, P, H & G	13 Wickliffe Street, Mosgiel 9024
305	Clarke, Andrea	116 Signal Hill Road, Opoho, Dunedin 9010
306	The Director-General of Conservation	C/- Bruce Hill, Department of Conservation, PO Box 5244, Dunedin 9016
307	Northburn Limited	C/- Tom Pinckney, RD 3, Cromwell
308	Clutha District Council	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
309	Central Otago District Council & Clutha District Council	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
310	Glen Dene Limited	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
311	Graham, Ben	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
312	Wyllies Crossing Limited	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
313	Calder Stewart Industries Limited	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
314	Greer Farms Partnerships	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
315	DJ & JC Andrew & the DJ Andrew Family Trust & Partnership	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
316	Homestead Farm Limited	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
317	Rob van Vugt & Sunset Dairy Limited	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
318	GB & RE Gardner Partnership	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
319	Macraes Community Incorporated	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
320	Mainland Poultry Limited	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
321	Michelle, Travis	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
322	Borst, Robert	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
323	Dunedin International Airport Limited	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
324	Elliot, AWB	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
325	Parks, Simon	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
326	Kyeburn Pastoral Company Ltd	C/- Bridget Irving, Gallaway Cook Allan, PO Box 143, Dunedin 9054
327	Lone Star Farms Ltd	C/- Boyd MacDonald, PO Box 1242, Nelson
328	Rowland, Peter	1 CRD, Oamaru 9491
329	Williams, Richard	RD 15 K, Oamaru 9494
330	Sheat, Ronald	2 RD, Palmerston
331	R & M Borrie Ltd	C/- Rogan Borrie, 15 KRD, Oamaru 9494
332	Hunter, Graham & Pam	202 Kononi Road, RD1, Lawrence
333	Lake Edge Farms Ltd	C/- Karl Burgess, 87 Lakeside Road, 2RD, Owaka 9586
334	Cocks, Alastair	Braeburn, RD1, Clinton 9583

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1 Edna & Thomas Williams

Submission considered entirely beyond the scope of the plan change.

2 Helen Constance

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
54.2	Beyond the scope	Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, stormwater and other specified contaminants, and discharges from industrial and trade premises	Not Applicable	Keep all spraying of waterways 'off-limit' and use the balance of ecological means instead.	• Ecological balance gives good quality water.
201	General support	Whole plan change (general support)	Support	Aim for good quality water in Otago.	• No reason given.

3 David Wharton

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	To pass the proposal.	• Improve water quality. • Control effects of agricultural runoff and stock management.

4 Colin Rawle

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
223	Alternative approaches	Riparian planting	Not Applicable	All river banks should be replanted with suitable vegetation (not willows) to a width of perhaps 20 metres.	• Cleared river banks with stock grazing are susceptible to erosion, slipping, silting and contamination. • Excrement, fertilisers, pesticides and herbicides become toxic run-off.

5 Martin Ford

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Support	Maintain and then improve water quality.	• Clutha River, Puerua River and Karoro Creek should be pristine to support Molyneux Bay.

6 Andrew McCurdy

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Support	Maintain proposed levels through the process thus protecting water quality - don't water it down.	• Stringent setting of specified limits for discharges will protect water quality.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Support	Maintain proposed levels through the process thus protecting water quality - don't water it down.	• Stringent setting of specified limits for discharges will protect water quality.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Splitting Pomahaka River catchment into Area 2 and Area 4 to reflect different river and catchment characteristics over the rivers length.	• Recognise catchment value of this very important waterway.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Support	Maintain proposed levels through the process thus protecting water quality - don't water it down.	• Stringent setting of specified limits for discharges will protect water quality.
211	Implementation	Compliance, enforcement, education	Amend	Amend plan to include monitoring of compliance by ORC.	• Essential for plan implementation, waterway preservation, polluter compliance.

7 Luxmore Dairies

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend by saying no limit on height or diameter of culverts. Amend crossing length to say 20 m.	• Maximise flood carrying capacity. • Battering reduces usable crossing.

8 Stephen Cole

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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".	• Mitigation measures should meet required ORC standard, including native planting.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Remove rule providing a narrow consenting option for discharges that do not meet specified limits.	• Open to abuse, defeats rules for good quality water, affects fishing, tourism, pleasure.

9 Angus Chapman-Cohen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Amend	Allow the clearing of some waterways e.g. drainage where needed. Avoid swamping.	• So improved land does not revert back to swamp.

10 W H Thomas

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
211	Implementation	Compliance, enforcement, education	Not Applicable	Surveillance of farmers and other land managers to achieve discharge limits is essential to control any activities in this direction.	• To achieve discharge limits.

11 Marianne Shennan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
244	Alternative approaches	Other approaches	Not Applicable	Agri-industry should dispose of their own waste or find way to recycle it (i.e. dung as fuel).	• Water is of inestimable value.

12 Barry Williams

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Did not specify	Why are rules [for cleaning creeks and ditches] same as rivers for consents? Why do we require permission from ORC, Fish and Game, DOC, Iwi?	• Had a costly consent for cleaning out a creek.

13 Kelvin Milne

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Support tougher rules on wastewater.	• No reason given.
222	Beyond the scope	Beyond the scope - general	Not Applicable	Support bigger finds [fines].	• No reason given.

14 Mrs I Green

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	This proposal, if designed to improve water quality, should stand as it is.	• Reduce health risks and degradation of waterways.
244	Alternative approaches	Other approaches	Not Applicable	Tighter control should be made on farmers' allocated water to stick to that allocation.	• Actual water use greater than allocated water use, causes loss of water quality.

15 Mrs Marie C McDonald

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
244	Alternative approaches	Other approaches	Not Applicable	Government help farmers financially to encourage them to fence off along the edges of rivers and streams.	• Cows cause pollution and trample fish eggs.

16 Kaye Kearney

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Implement the plan change.	<ul style="list-style-type: none">• Needs to take place now.

17 J Starke

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	ORC to go ahead with their submission.	<ul style="list-style-type: none">• Supply quality water.

18 Jim Oliver

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	The ORC just keep on policing water, and runoffs, as they are doing.	<ul style="list-style-type: none">• Any change would involve more cost.

19 F R & R Penny

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	In favour of all moves to the delivery to our homes of fresh clean water.	<ul style="list-style-type: none">• No reason given.

20 Paul Martin

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
220	Other matters	Process	Not Applicable	Consultation process inadequate and doesn't meet local government requirements.	<ul style="list-style-type: none">• Without access to all the documentation effective consultation is not feasible.
223	Alternative approaches	Riparian planting	Not Applicable	Vital that riparian strips are mandated to be planted closely with a wide variety of native plants.	<ul style="list-style-type: none">• Creates barrier for mammals, filters effluent, reduces bank erosion.

21 Zoe Mitchell

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Any change that reduces/tightens rules for discharge of contaminants etc into our waterways is a positive change.	<ul style="list-style-type: none">• Need stricter rules on what seeps into rivers.• Positive effect on water quality.• Drinkable freshwater.

22 J H Manley

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Proposed Plan Change 6A should proceed.	<ul style="list-style-type: none">• Important to keep the waterways clean.

23 Neil Douglas Cruickshank

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Prohibit stock from access to our waterways where it is feasible to do so.	<ul style="list-style-type: none">• Rights of others downstream to have good quality water, farming practices have to change.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Only permit passage of stock through waterways where it is feasible way of stock.	<ul style="list-style-type: none">• Rights of others downstream to have good quality water, farming practices have to change.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Only permit passage of stock through waterways where it is the only feasible way of moving stock.	<ul style="list-style-type: none">• Rights of others downstream to have good quality water, farming practices have to change.

24 Tami and Jason Sargeant

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
93	Prohibited discharges	Rule 12.C.0.1 - Discharge	Support	Prohibit discharges that have an obvious effect in	<ul style="list-style-type: none">• Protect waterways for recreational purposes.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		prohibited		receiving water bodies.	
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	Support	Prohibit discharges that have an obvious effect in receiving water bodies.	• Protect waterways for recreational purposes.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	Support	Prohibit discharges to water, that damage property.	• Protect waterways for recreational purposes.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Support	Prohibit discharges from disturbed land to water, where no mitigation measures are taken to avoid sediment runoff.	• Protect waterways for recreational purposes.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Support	Prohibit discharges to water from animal waste systems, silage storage or a composting process.	• Protect waterways for recreational purposes.
201	General support	Whole plan change (general support)	Support	Support the proposed plan change.	• Protect waterways for recreational purposes.

25 Lydia Edwards

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	To maintain water quality, improve it through control of contaminants discharging from land to water. That ORC support the proposed plan change.	<ul style="list-style-type: none"> • Supports amendment of provisions for river and lake beds, and streamlining. • For good quality water. • Reduce effects of discharges. • Landholders will need to pay costs.

26 Nina Pennycuik

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
224	Alternative approaches	Fencing	Not Applicable	Would like to see an exemption clause which people can apply for, for a reasonable fee, which allows people to present a case for them not being required to fence.	• Regulations for environmental damage caused by corporate style farming should not unfairly disadvantage small landholders.

27 C J Downing

Submission considered entirely beyond the scope of the plan change.

28 P R Lyders Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
63	Beyond the scope	Rule 12.B.1.9 / 12.4.1.2 - Stormwater road discharge permitted	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.

29 E J Munro

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
211	Implementation	Compliance, enforcement, education	Not Applicable	Waterways need protection through prosecution of those who offend.	<ul style="list-style-type: none"> • Voluntary measures do not stop degradation. • Dairying only allowed when safeguards are in place.
223	Alternative approaches	Riparian planting	Not Applicable	Riparian strips should be compulsory on all waterways.	<ul style="list-style-type: none"> • Voluntary measures do not stop degradation. • Dairying only allowed when safeguards are in place.
227	Prohibitions	Prohibitions - general requests	Support	Waterways need protection through prohibition of contaminants.	<ul style="list-style-type: none"> • Voluntary measures do not stop degradation. • Dairying only allowed when safeguards are in place.

30 Donald Scott

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> water quality. • Small streams more vulnerable. • Best use of available resources. • Actual or potential effects on water quality. • Sensitivity of receiving environment.
222	Beyond the scope	Beyond the scope - general	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Concerns relate to 7.C.2(a) [operative policy 7.7.4]. • Sensitivity of receiving environment to adverse effects.

31 A L Graves

Submission considered entirely beyond the scope of the plan change.

32 Jeanette Spooner

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Add support for the aim to have good water quality.	<ul style="list-style-type: none"> • No reason given.
222	Beyond the scope	Beyond the scope - general	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Mining uses water and causes pollution.
224	Alternative approaches	Fencing	Support	Fencing to keep stock out. Would like to see work done with farmers to bring this in. Because of the cost maybe it could be brought in over time.	<ul style="list-style-type: none"> • Something needs to be done.

33 David John Mackie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
244	Alternative approaches	Other approaches	Not Applicable	Believe farmers should be given more time to enlarge their effluent ponds.	<ul style="list-style-type: none"> • Consents given by ORC in first place. • Larger ponds needed to hold effluent until conditions are right. • Too quick to take farmers to court - farmers and ORC in this together.

34 Patrick Alexander McGettigan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Rule should say that when farms are being converted to different practices the owners need to apply for a resource consent.	<ul style="list-style-type: none"> • Ensure land is suitable for new practices. • Current focus on symptoms, not cause. • Deterioration in water quality over last ten years.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	Rule should say that when farms are being converted to different practices the owners need to apply for a resource consent.	<ul style="list-style-type: none"> • Ensure land is suitable for new practices. • Current focus on symptoms, not cause. • Deterioration in water quality over last ten years.

35 Lynne Hill

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Encourage the ORC in any decisions which would reverse the decline in water quality seen over the past ten years.	<ul style="list-style-type: none"> • Water is valuable resource. • Intensive farming linked to declining water quality.
211	Implementation	Compliance, enforcement, education	Not Applicable	Water is a valuable resource and should be carefully monitored.	<ul style="list-style-type: none"> • Intensive farming linked to declining water quality.

36 Shag Valley Station

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Make this an activity that was permitted or that resource consent could be sought to allow occasional movement of stock through this waterway [Shag River].	<ul style="list-style-type: none"> • Use of 3 historic crossings on a seasonal basis would impact farming operation. • Shag River prone to major flood events - cost of building bridge is prohibitive.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Animal welfare (e.g. sheep need to get back to the woolshed because of a fly strike outbreak). • Crossings used are gravel based and firm (no erosion or pugging caused).

37 Wayne & Billee Marsh

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Support Proposed Plan Change 6A. We seek the adoption of Proposed Plan Change 6A by the ORC.	<ul style="list-style-type: none"> • Proposed Tarras Irrigation Scheme will bring intensive farming to our area. • Farming practices not acceptable if pollute aquifers and waterways. • New Zealanders expect higher standards of environmental management. • Regulate farming and industrial practices to keep waterways and aquifers pollution free.

38 Alan G Cone & Judy Bagrie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Just get it done would be great.	<ul style="list-style-type: none"> • Continued build up of algae in Lake Wanaka. • Rapid build up of livestock numbers in Lakes catchments. • Stock number build up closely linked with fertiliser application.
222	Beyond the scope	Beyond the scope - general	Not Applicable	All testing [of Lagarosiphon control in Lake Wanaka] be peer reviewed.	<ul style="list-style-type: none"> • Amount of Diquat being used. • How well it has been site tested on small aquatic creatures. • Edge fishing has been very poor since December as lack of insect and bully life.

39 Hewett Farm Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	The 30 kgN/ha per annum target is too low for winter crops and needs specific attention.	<ul style="list-style-type: none"> • Negative impact on crop productivity as yields reduced, so larger crop areas needed. • Economic and potential environmental implications.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Did not specify	Would like some examples explained for given P applications what the impact on DRP levels are, particularly if N applications are substituted for P to get around N loadings.	<ul style="list-style-type: none"> • Maintenance fertiliser application (particularly P-based) shouldn't breach 30 kgN, but DRP levels need to take this into account.
127	Defining good water quality	Table 15.2 - Receiving water standards	Did not specify	To understand what the minimum acceptable levels will be that balance economic considerations, and what these implications are for land owners, over what time frame for implementation.	<ul style="list-style-type: none"> • Not satisfied with explanation of why targets have been set at the levels they have. • Will levels maintain water quality at acceptable economic cost?
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Did not specify	To understand what the minimum acceptable levels will be that balance economic considerations, and what these implications are for land owners, over what time frame for implementation.	<ul style="list-style-type: none"> • Not satisfied with explanation of why targets have been set at the levels they have. • Will levels maintain water quality at acceptable economic cost?
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Agree with the general principles of water quality for Otago.	<ul style="list-style-type: none"> • Land use is not stipulated. • Pragmatic and flexible approach.
224	Alternative approaches	Fencing	Not Applicable	A more pragmatic solution to this [fencing] requirement needs to be found, including the ORC providing funds to fence/reticulate water if the ORC wishes to pursue a fencing/water reticulation	<ul style="list-style-type: none"> • Economically onerous for sheep and beef farmers: extensive farm size and amount of waterways. • Need for reticulated water. • Potential impact on existing county water schemes to

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				timeline that a farmer cannot economically sustain, or will impact negatively on other farming investment priorities.	keep up with demand. • It would cost \$500,000 to fence off all waterways and reticulate water on our farm.
244	Alternative approaches	Other approaches	Not Applicable	Thought needs to be given to some form of N tradeable certificates for those who wish to apply more N than the guidelines allow, similar to the approach around Lake Taupo.	• Tactical N applications over the year.

40 Glenorchy Branch of Lakes Landcare

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Did not specify	No decision requested.	• Number of things of concern.

41 Rees Valley Station Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Delete 13.5A.	• Looked at problems case by case. • Allow flexibility. • Rees Valley Station has a lot of waterways with which stock interact in various ways. • Rule inappropriate for our farm.

42 G R Crutchley

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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".	• Conditions may not be reasonably applied in some situations. • Turbidity occurs naturally in some catchments well beyond the time thresholds specified, i.e. Kyeburn.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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."	• 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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	That a further exclusion clause be included in this rule to read; "Excluding established land use where this does not result in any detectable adverse effects on water quality or existing wetland".	• Boundary of Upper Taieri Wetland includes areas of freehold land which is sustainably used for grazing stock. • Farmers assured land use could continue. • Without exclusion clause, rule will adversely affect viability of properties with no beneficial effects on water quality or wetland values.

43 Graeme Isbister

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Allow normal traditional cultivation methods to be used provided they do not cause any breach of major soil runoff to waterways.	• 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,

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Allow normal traditional cultivation methods to be used provided they do not cause any breach of major soil runoff to waterways.	spraying methods on environment? <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?
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Lift the level of nitrate movement from land to the North Otago Volcanic Aquifer to 30 kgN/ha minimum.	<ul style="list-style-type: none"> 10 kgN/ha too low. This water source is not used for human consumption. Nitrate levels only part of water quality problem. Maybe other sources of contaminants going to aquifer (industry, civil population, road runoff, transport industry).

44 Steve Hayward

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Implement the change 6A Water Quality. Action must be taken (and enforced) as soon as possible.	Water quality throughout Otago and NZ is declining rapidly.

45 Hopefield Investments Ltd (C Cochrane)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	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.

46 Mosgiel Taieri Community Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Support	Support the general ambitions of the plan change, that is good water quality.	• No reasons given.
211	Implementation	Compliance, enforcement, education	Amend	That the Plan must be clearer, able to be monitored efficiently and effectively and the proposed mitigation needs to be cost effective.	<ul style="list-style-type: none"> • Rules pertaining to control of discharges such as overland run-off and to groundwater are uncertain and difficult to apply. • Uncertainty means difficult to be confident of compliance and manage risk. • Our area renowned for flooding.
227	Prohibitions	Prohibitions - general requests	Amend	That the Plan must be clearer, able to be monitored efficiently and effectively and the proposed mitigation needs to be cost effective.	<ul style="list-style-type: none"> • Rules pertaining to control of discharges such as overland run-off are uncertain and difficult to apply. • Uncertainty means difficult to be confident of compliance and manage risk. • Our area renowned for flooding.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	That the Plan must be clearer, able to be monitored efficiently and effectively and the proposed mitigation needs to be cost effective.	<ul style="list-style-type: none"> • Rules pertaining to control of discharges to groundwater and overland run-off are uncertain and difficult to apply. • Uncertainty means difficult to be confident of compliance and manage risk. • Our area renowned for flooding.
248	Other matters	Supports another submission	Not Applicable	No decision requested.	• Supports and endorses the DCC's submission [submitter number 211].

47 Des Boyes

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Legislation to protect it [water quality] is good.	<ul style="list-style-type: none"> • Water quality is very important. • Importance of vegetation. • Rainfall is declining.

48 Craig Werner

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
211	Implementation	Compliance, enforcement, education	Amend	Add to it the proposal to do monitoring of water runoff quality at every property at multiple points.	<ul style="list-style-type: none"> • Planned runoff testing programme details not given. • Many testing points required if runoff monitoring/control is the single regulatory method used, given the range of Otago geomorphology and geology. • Sampling numerous points can be expensive. • Selection of few test points too open to individual sampling bias and error which might leave points of dirty leakage undiscovered.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain the current regulatory approach and add to it the proposal to do monitoring of water runoff quality at every property at multiple points.	<ul style="list-style-type: none"> • Approach must be more stringent. • Discharges, land uses and nutrient inputs must be addressed to cope with the intensification of rural land use. • Failure to provide detail of testing programme. • 2020 compliance target to distant.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	Proposed change 6A is to monitor water quality discharges and to delete control of land use practices and the level of nutrient inputs. I believe this is wrong. All three controls are needed to cope with the intensification of rural land use.	• Intensification of rural land use.
236	Implementation	Transition times	Amend	Rather than plan change 6A's timetable, a compliance timetable much more rigorous than the 2020 target would assist in this regard.	<ul style="list-style-type: none"> • Year 2020 compliant target far too distant. • Waterways vulnerable to extreme drought. • Unprecedented weather patterns are a global reality.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Damage done by low flow/high pollutant concentrations to aquatic species, other flora and fauna • Ensure ratepayers not exposed to negative economic impact of restoration required by extreme climate events.

49 Roy A Wilson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
209	Discharge rules	Chapter 12 - general requests	Did not specify	How this discharge [south end of Taieri Plain] can be guaranteed to be the required quality must be proven before anymore ratepayers funds are spent.	<ul style="list-style-type: none"> • South end of Taieri Plain is unique design where water is pumped out. • Discharge joined by other drainage from several areas, e.g. Berwick triangle, under the contour channel.

50 G & S Geddes

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Oppose	Oppose 13.5.1.8A.	<ul style="list-style-type: none"> • Does this mean no stock water? • Can animals cross irrigation races when water running?
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Oppose 13.5A.0.1.	<ul style="list-style-type: none"> • Does this mean no stock water? • Can animals cross irrigation races when water running?
202	General opposition	Whole plan change (general opposition)	Oppose	Oppose the whole format in the current form.	<ul style="list-style-type: none"> • Website a minefield, hard to get information pertaining to farming situation. • Not enough discussion with those affected. • How do you plan to police change and have it remain workable for farming in future?

51 Marianne & Michael Parks

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	<p>Would like more information as to how the Regional Council is likely to obtain a nutrient budget for all land use activities via OVERSEER and how it intends to ensure that fertiliser application is as indicated in the nutrient management plan is as planned.</p> <p>If this rule change will lead to a whole new bureaucracy, we would not be supportive.</p>	<ul style="list-style-type: none"> • Supportive of minimising N fertiliser getting to water. • Not supportive of only dairy farms monitored (cropping farms use higher amounts of N). • Not supportive if rule change leads to whole new bureaucracy.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Did not specify	A key development we would like to see implemented that would have a key influence on meeting the targets set in this rule [12.C.2.1] include: ... Meeting the standards within this rule are able to managed through good management of the waterway.	<ul style="list-style-type: none"> • ORC management of Pomahaka River at Kelso. • Lack of gravel extraction causing erosion, tons of soil entering waterway smothering native fish. • Want to see ORC's management plans of waterways. • ORC needs to be active in solution of effective management of waterways.
244	Alternative approaches	Other approaches	Not Applicable	Key development we would like to see implemented that would have a key influence on meeting the	<ul style="list-style-type: none"> • Not acceptable only land users on waterways targeted (catchment far greater).

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				targets set in this rule [12.C.2.1] include a sustainable farming fund managed by the Regional Council where land users can obtain funding from Council to fence off waterways and riparian planting that create corridors of native plants along the banks of waterways to support habitats for native birds and fish as well as preventing silting by mitigating erosion. What we envisage is something similar to the QE2 Trust that works in partnership with land users to support water quality improvements through fencing of waterways and riparian planting.	<ul style="list-style-type: none"> • Don't support focus on dairy (all land users polluters e.g. deer) • Some emphasis in plan on how ORC will co-ordinate with farmers on waterways re fencing and riparian planting • Funding should be part of solution.

52 J P Robertson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
224	Alternative approaches	Fencing	Not Applicable	Allow me to not fence the [Cardrona] river running through my farm as it is unfenceable.	<ul style="list-style-type: none"> • Stock have lots of drinking water (creeks and ponds) without using river. • Stock spend 6 months with no access to river.

53 Melvyn Hollis

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Support of all methods which the ORC can introduce to improve the water quality of our rivers, streams, lakes and wetland areas.	<ul style="list-style-type: none"> • No reasons given.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	Concerned about high intensity stock management on the Taieri Plain, where clay field tile drains are installed and would prefer that this practice is prohibited.	<ul style="list-style-type: none"> • Field drains never intended to cope with large quantities of stock effluent. • Intensive grazing on saturated ground increases pollution runoff to Taieri River. • Waterway been degrading over past 40 years. • Implement a better way to graze high cow numbers • Allowing 21st century intensive grazing practises on 19th century farming practices for draining fields does not equate to improvement. • Should be addressed immediately.

54 North Otago Vegetable and Growers Association

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>(i) From 31 March 2019, calculated nitrogen leaching by the Council using OVERSEER version 6.0, does not exceed:</p> <p>(a) 10 kg...</p> <p>(b) 30 kg...</p> <p>(c) 50 kilograms nitrogen per hectare per year over North Otago Volcanic Aquifer.</p> <p>We request that the ORC undertake a Public Health Risk Assessment of the aquifer in keeping with ORC's effects based ideology for policy and rules.</p>	<ul style="list-style-type: none"> • OVERSEER not applicable to market gardening systems in current form. • North Otago Volcanic Aquifer about 30 mg/L for nitrates - drinking water standard is 11.3 mg/L. • No domestic or communal supplies from aquifer.

55 H F Adams

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general)	Support	Supports the general thrust of the plan change.	<ul style="list-style-type: none"> • In pork industry two settling ponds were not enough, four

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		support)		Stock must be kept from all streams, rivers, etc. Effluent disposal that is raw needs to be strictly monitored.	were needed <ul style="list-style-type: none"> • Those with "honey wagons" needed to leave a cover to avoid run-off. • A new piggery in Invercargill with latest equipment was forced to close as was polluting river. • Wilding pines should be left to grow and improve water quality and reduce scree movement. • A positive partnership approach be used to implement plan.

56 Three Creeks Farm Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	The proposed nitrogen loading is unrealistic at 10 or 30 kg/ha.	<ul style="list-style-type: none"> • Based on a model yet to be tested and peer reviewed within this or any other catchment in Otago. • Doesn't account for distinct different regions and farming systems. • Proposed limit will make my farming system untenable. • Contrary to RMA and ORC objectives in setting sustainable limits. • Loading limits unworkable. • Loss of tree shelter and effects on animal welfare, with change to spray irrigation.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Oppose (e) and (f).	<ul style="list-style-type: none"> • Shifting to spray irrigation from border dyke would affect water feeding wetland (Te Hua Taki Wetland). • Changing to spray irrigation would lose tree shelter and affect bird life.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Seek to delete this from the plan.	<ul style="list-style-type: none"> • It is uncertain. • Measurement difficult. • Even if could measure, probably impossible to comply with Schedule 16.

57 University of Otago, Department of Zoology

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
18	Managing effects of land use on water quality	Section 7.B - Policies general	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.
91	Discharge rules	Section 12.C - Other discharges	Amend	Specifically include non-point source discharges in the wording.	<ul style="list-style-type: none"> • Current wording potentially interpreted as only point source.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
121	Simplifying and streamlining	Chapter 15 - Methods	Amend	Consider cross referencing the Methods Other than Rules Section 15.4.2 of the Water Plan and adding a sentence on continuing to work with landowners on matters of monitoring and compliance.	<ul style="list-style-type: none"> • Better explanation of how effects-based approach should work in practice needed.
124	Simplifying and streamlining	Information requirement 16.3.3 - The discharge of water or contaminants	Amend	Add a clause which requires the applicant to seek confirmation from Council that no threatened native fish are present in the area resource consent has been applied for. If threatened fish populations have	<ul style="list-style-type: none"> • Information required for consent application falls short of providing adequate protection to freshwater biodiversity. • To give effect to the NPS for Freshwater Management 2011 and promote the purpose of the RMA.

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				<p>previously been identified in the area, then an adequate fish assessment involving electric fishing or trapping must be conducted by a suitably qualified expert.</p> <p>Add a comprehensive map to the Water Plan which identifies populations of threatened freshwater fish.</p> <p>If the area for which consent is sought falls within identified native fish habitat areas the landowner must seek an adequate fish assessment of the area as above.</p>	
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>Include cumulative effects (contamination from several farms in a catchment combined) by adding a separate class for cumulative maximums in waterways, and localised areas of lakes.</p> <p>Assign lower values to Area 1 limits per discharge, in addition to the introduction of cumulative maximums per catchment.</p>	<ul style="list-style-type: none"> • Current limits potentially interpreted to apply to individual farms. • Number of farms in small catchment with compliant discharges might cumulatively mean an unacceptable effect. • Discharge limits in Area 1 too generous and would decrease water quality.
203	Simplifying and streamlining	Removal of issues - general requests	Amend	<p>Amend second paragraph of Introduction [to plan change document]. Explain briefly why non-point source pollution and cumulative effects are so important. The University suggests adding sentences to this paragraph along the following lines "Non-point source pollution is especially hard to quantify. The cumulative effects of pollution may cause damage and degradation to recreational activities, private and public water supplies, the amenity values and natural character of an area, and the flora and fauna of our freshwater ecosystems. It is therefore imperative that we start managing pollution more effectively, including pollution from non-point sources, in order to stop further degradation of our waterways".</p> <p>The Plan could also refer to the recent Council report that showed that water quality has declined in 33 of Otago's 62 regularly monitored waterways during the past 10 years, as cited in an Otago Daily Times article on 18 April 2012.</p>	<ul style="list-style-type: none"> • Reasons within decision requested.
211	Implementation	Compliance, enforcement, education	Amend	<p>Amend Introduction [to plan change document] to add detail on enforcement regime for new Water Plan regulations. Better explain how the new discharge regulations in Rules 12.C.0, 12.C.2 and 13.5A.0 are to be monitored and enforced by Council. This could be achieved by cross referencing the Monitoring and Review Section 19 of the Water Plan and inserting a sentence regarding the relevant enforcement sections in the RMA (Part 12, Declarations, Enforcement and Ancillary Powers).</p>	<ul style="list-style-type: none"> • Emphasise new regulations are not in name only and will be monitored and enforced by ORC. • Prosecution action taken for non-compliance.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	<p>Amend description of "effects-based approach" in Introduction [to plan change document]. Better explain how this approach should work in practice given the existing workloads and resources of both</p>	<ul style="list-style-type: none"> • Supports approach in principle but queries how will it work in practice. • Unrealistic to expect farmers to regularly collect discharge samples without frequent checks from ORC

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				the affected farmers and ORC staff.	compliance staff and enforcement action. • Compliance would require considerable staff time and money. Could create resentment with farmers.
222	Beyond the scope	Beyond the scope - general	Not Applicable	Add an additional clause to 13.4.1.1 providing: (i) An assessment of freshwater fish values is completed in both the upstream and downstream areas of the structure. Make 13.4.1.1 a controlled or restricted discretionary activity, and then assess each area for freshwater fish values upon resource application, thereby allowing the Council to apply conditions ensuring the protection of native fish populations.	• Poses a high risk to freshwater biodiversity. • Needs to be amended to provide adequate protection. • Removal of structure may unintentionally link fish populations e.g. Galaxiids and Trout.
227	Prohibitions	Prohibitions - general requests	Amend	12.C.0: Replace "prohibited activities" with "non complying activities". Suggested that this section be revised as "non complying activities" with a stated preference towards public notification of applications for such activities.	• Prohibited status rarely used as level of environmental effects to justify application is high. • Prohibited rules difficult to enforce. • Changing status will be deterrent for applications. • Will allow applications judged on unique circumstances. • More palatable to farming community.
244	Alternative approaches	Other approaches	Not Applicable	Encourage "best management practice" for agriculture to help ensure that waterway health can be as good as realistically possible in farmed areas.	• Encourage fencing, riparian planting, and preventing livestock damage to waterways. • Mentioning issues in Table 15.1 (vegetation is not stripped bare) not sufficient.

58 C P Mulholland

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Permitted activity with all reasonable steps taken to lessen risk of adverse effects of water quality.	• Mostly use direct drilling. • Cannot control weather e.g. Flash floods. • Must turn soil over. • During lambing not practical to move stock.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Support 13.1.1.1	• No reasons given.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Culverts put in where necessary, but not practical to fence every waterway.	• Cannot control stock at all times. • Hill country extensive and difficult to access. • No control of poachers.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Oppose.	• How do farmers measure a discharge, or water from thunderstorms, snow melt. • May rain 2ml on farm but neighbour gets 30ml so uncontrollable to farmer downstream. • Not practical to farming operations.

59 Glenayr Ltd (D & D Sangster)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Amend	Needs to be a discretionary activity as one size does not fit all.	• 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Should be a discretionary activity with all reasonable care and practical steps taken.	• 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.

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97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Needs to be a discretionary activity as one size does not fit all.	<ul style="list-style-type: none"> • Graze cows/calves on some wetlands at low stocking rate. • Put minimal fertiliser on land. • Every farm has different circumstances and a lot of our swamp is at times dryland.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Oppose.	<ul style="list-style-type: none"> • Don't think x hours after rain will always apply. • 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, lead in time needed.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Support.	<ul style="list-style-type: none"> • Cost of consent used to spend on structure.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Oppose.	<ul style="list-style-type: none"> • Not practical to fence every waterway. • Farm has numerous drains, ditches. • Have fenced Taieri River, but not practical to fence every hollow, drain, lagoon, ditch on a floodplain. • Fencing has tradeoff with weed growth and water being held back. • Have provided culverts and crossings but cannot guarantee stock use them.

60 Phillip Hunt

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.

61 S H Andrews and Sons Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	That in our situation a maximum of six cattle crossings per year be permitted.	<ul style="list-style-type: none"> • Move cattle through Taieri six times a year, mob in river about 2 minutes. • Damage less than minor • Alternative two hour droving on 7 km of public roads.
209	Discharge rules	Chapter 12 - general requests	Did not specify	Will in no way accept responsibility for degraded	<ul style="list-style-type: none"> • Potentially threaten ability to farm.

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				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"> • Water draining our farm is reasonable quality. • Will not accept responsibility for degraded water entering property from neighbours. • Flooding events result in water eventually entering Taieri often weeks or months later.

62 Green Party (Dunedin Branch)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Support	Strongly support these [prohibited activities].	<ul style="list-style-type: none"> • Prohibits exposed soils close to water courses.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Support	Strongly support these [prohibited activities].	<ul style="list-style-type: none"> • Effluent management.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Support	The transition times for meeting discharge standards after notification of a failure to meet these standards is far too long at 7 years for total nitrogen and 5 years for all other discharges in particular waterways as set out in Schedule 15. We would recommend a 2 year period.	<ul style="list-style-type: none"> • Support load limits of nitrogen, and classification of aquifers into two types. • Issue is urgent, cannot allow to drift for five years. • ORC to accept responsibility for decline in water quality.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Hard to see how could livestock disturb waterways without damaging fauna and flora.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Hard to see how could livestock disturb waterways without damaging fauna and flora.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Support	Strongly support these [prohibited activities].	<ul style="list-style-type: none"> • Prohibiting direct stock access causing damage.
125	Defining good water quality	Schedule 15 - Good quality water	Support	Consider the proposed contaminant limits for surface water are adequate.	<ul style="list-style-type: none"> • Decline in water quality related to intensive agriculture. • ORC to accept responsibility for decline in water quality. • Under proposed rules how long for water bodies to return to pristine state? • Issue urgent, don't let it drift for 5 years.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Would recommend a 2 year period [transition time].	<ul style="list-style-type: none"> • Five years is too long.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Would recommend a 2 year period [transition time].	<ul style="list-style-type: none"> • Seven years and five years too long.
209	Discharge rules	Chapter 12 - general requests	Amend	If the ORC thinks that stricter rules may be needed in the future it should at least indicate in a document such as this Water Quality Rules and Standards, that if, in the future, standards are not being met under the existing rules future rules will be introduced. The nature of these future rules would need to be spelt out.	<ul style="list-style-type: none"> • NZ authorities need to be aware of consequences that will follow from the government signing the Trans Pacific Partnership Agreement and some Free Trade Agreements. • Clauses give a partner nation's company the right to take legal action, where laws, rules and policies are changed subsequent to the company operating in NZ. The least restrictive conditions apply, as stricter rules are treated as unreasonable constraints on free trade.
211	Implementation	Compliance, enforcement, education	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • How does the Plan propose to judge the source of contaminant in a waterway? • Plan does not address how to monitor and control non-point source pollution. • Discharges can only be monitored in water courses leaving a property.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Water leaving property may have originated elsewhere. • Serious omission.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	If ORC is committed to restoring and protecting the natural values of each river, lake and wetland in Otago, which is its statutory responsibility, then it will have to reconsider its overall approach.	<ul style="list-style-type: none"> • Land use controls should be used. • Does not address how to monitor and control non-point source pollution. • Relationship of water quality with river flows not considered.
223	Alternative approaches	Riparian planting	Not Applicable	For dairy farms make mandatory the planting of riparian strips (10 metres wide) beginning in 2 years of the adoption of these rules and standards, and staggered over 10 years.	<ul style="list-style-type: none"> • Farming practice which would help meet water quality standards.
224	Alternative approaches	Fencing	Not Applicable	For dairy farms make mandatory the fencing off of all waterways, staggered over 10 years.	<ul style="list-style-type: none"> • Farming practice which would help meet water quality standards.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	<p>Acknowledge that intensive dairy farming is incompatible with good water quality without the introduction of a strong regulatory approach.</p> <p>Dairying on sensitive aquifers should be a prohibited activity. It is essential that these issues [herd homes, animal welfare, effluent management] are addressed before dairying is established on a sensitive aquifer.</p>	<ul style="list-style-type: none"> • Hard to understand why ORC adamant it will not use RMA section 30(1)(c)(ii) allows land use control. • Inevitable cost to water quality from intensive land use, costs ultimately transferred to ratepayer when Councils monitor or remediate contaminated waterways. • Increase in irrigation and ability of river flows to assimilate run off. • Effects-based approach unlikely to protect water bodies at risk from development of dairying in association with new irrigation schemes. • Permissive approach does not protect water quality. • Admitted at ORC meeting that the only dairying that would meet sensitive aquifer discharge requirements would be herd sheds housing cows for 12 months, with feed cut and carried or supplements. • Effluent management impossible under such a regime, and animal welfare issues.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	It may be necessary for the ORC to require that winter feed is cut and carried to the stock in a place where the effluent can be captured.	<ul style="list-style-type: none"> • N leaching from winter blocks a serious issue.
227	Prohibitions	Prohibitions - general requests	Amend	For dairy farms make mandatory the prohibition of irrigation run off into creeks.	<ul style="list-style-type: none"> • Farming practice which would help meet water quality standards.
244	Alternative approaches	Other approaches	Not Applicable	A further consideration is the relation between river flows and contaminated runoff. Can find nowhere in the plan where this issue is addressed.	<ul style="list-style-type: none"> • Water quality threatened by increase in irrigation. • River at winter levels can assimilate contaminants. • Water taken at low flows affects rivers' ability to assimilate.

63 Peter Deans & Graham Deans

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	12.C.1.3 (b) Amend so 30kg nitrogen per hectare per year averaged out over whole farm per year e.g. not just crop paddocks.	<ul style="list-style-type: none"> • Average over whole farm.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge	Support	Agree with rule.	<ul style="list-style-type: none"> • Helps make bridges easier to put in.

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		permitted			• Keeps stock out of waterways.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	13.2.1.7B (b) Amend rule so the top height of crossings to be lifted to 3 to 5 meters above creek base.	• Agree with rule. • Some need to be built up to create safe crossing. • More crossings keep stock out of waterways.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	It is unpractical to fence off all waterways.	• No water schemes in many rural areas. • Stock need access to water and must have access to shelter (Animal Welfare Act). • A lot of shelter is in bush clad gullies and depressions, near creek beds. • Rule has some positive points.

64 Providence Farm 2007 Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Removal of nitrogen loading limits 10 and 30kg/ha.	• Unrealistic, based on a model which has yet to be tested and peer reviewed. • Doesn't account for distinctive regions and farming systems. • Unworkable, make my farming system (including border-dyking) untenable. • Contrary to the RMA and ORC objectives to set limits in a sustainable way. • Timespan between notification and end of the submission period leaves little opportunity for making a researched submission based on true consultative basis.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Seek to delete this from the plan.	• Rule uncertain, measurement difficult. • Impossible to comply with Schedule 16 limits.

65 Gerald Burgess

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	One hour to be changed to 72 hours. Twelve hours to be changed [to] 3 days.	• High rainfall areas take longer to settle.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Triple N number to be more leaner.	• Winter tests give high results with wet weather. • High clover usage. • Waterfowl gives bad results.

66 Barry John Burgess

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Need more time to clear water.	• It just won't happen.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Lift acceptable NNN levels to 1.5 - 2 (mg/l) instead of 0.45 mg/l in winter. E Coli levels need to be lots higher in the dry summer time.	• Unachievable.

67 G Evans

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Sediment into water should relate to soil type and varied accordingly.	• No reason given.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Did not specify	(b) 30 kgN/ha/farm elsewhere in Otago.	• No reason given.

68 Greg Ramsay & Gae Stott

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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).
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	The top height of crossing is far too low for deep gullies, 3-5 metres.	<ul style="list-style-type: none"> • Needs to be case-based (5 metres +).

69 Peter T Borrie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	I will accept any figure of more than 30 kg per ha of nitrogen that the Lower Waitaki Irrigation Company expert witness determines.	<ul style="list-style-type: none"> • 30kg N/ha unachievable for border dyke, dairy or intensive grazing farm. • In Lower Waitaki about 10,000 ha border dyke, 90% dairying for more than 5 years. • More farms convert from border dyke to spray irrigation yearly, and more DCD used (lower nitrates). • Disadvantages of moving from border dyke irrigation - trees and wetlands removed, increased energy use, large capital investment. • Welcome Creek spring fed, salmon hatchery established, trout flourish. • Drinking water in Lower Waitaki above WHO standards.
211	Implementation	Compliance, enforcement, education	Not Applicable	Promote monitoring to ensure we all abide by the required standards to ensure that quality is maintained.	<ul style="list-style-type: none"> • No deterioration in water quality. • 4th generation farmer and land caretaker.

70 Hawkdun Idaburn Irrigation Company Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Gel is not a good controlling agent. • Experience is too limited.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	Not Applicable	Permit weed spraying adjacent to irrigation races.	<ul style="list-style-type: none"> • Control noxious plants.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	Not Applicable	Permit weed spraying adjacent to irrigation races.	<ul style="list-style-type: none"> • Control noxious plants.
63	Beyond the scope	Rule 12.B.1.9 / 12.4.1.2 - Stormwater road discharge permitted	Not Applicable	Needs to include storm flow from irrigation systems.	<ul style="list-style-type: none"> • Should be permitted into natural watercourses.
65	Beyond the scope	Rule 12.B.3.1 / 12.4.2.1 - Stormwater discharge restricted discretionary	Not Applicable	Needs to include storm flow from irrigation systems.	<ul style="list-style-type: none"> • Should be permitted into natural watercourses.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					factor.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	Should all be permitted.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Should all be permitted. Delete 12.C.1.5(i) from the rule.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Scheme picks up water from 2 watersheds.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Should all be permitted. (a) should be deleted.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Serious implications for our irrigation scheme.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Should all be permitted.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Sky the limit, open to bureaucratic abuse.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Oppose	Should all be permitted. Delete whole section.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Serious adverse effect upon our irrigation scheme, hold rights to transfer such water. • Alarming that taking water from one watershed and discharging it into another watershed will become an activity requiring consent, when the water rights already include that consent.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Should all be permitted. Approve.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Should all be permitted. Approve.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Support	Should all be permitted.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Should all be permitted. Approve.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems.
111	Bed disturbance - structures and animal waste	Rule 13.3.2.1 - Alteration of a structure restricted discretionary	Support	Should all be permitted. Approve.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Should all be permitted. Delete (e) too restrictive.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Unnecessary, those paying bills will determine.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Should all be permitted. Delete (c) too restrictive.	<ul style="list-style-type: none"> • Repair and maintenance of irrigation systems. • Unnecessary, those paying bills will determine.
127	Defining good water quality	Table 15.2 - Receiving water standards	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Region wide standards and limits - regional or local conditions vary, so common sense has to be balancing factor.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Managing rural discharges with focus on controlling contaminants - theoretical knowledge and practical farming observations poles apart. • Not easily recognised where water might gather before leaving the farm. • Cost, reduced productive output, disincentives to overbearing and demanding proposal.
222	Beyond the scope	Beyond the scope - general	Not Applicable	No decision requested [regarding Section 13.4]	<ul style="list-style-type: none"> • Yes.
224	Alternative approaches	Fencing	Not Applicable	Fencing our responsibility to decide.	<ul style="list-style-type: none"> • Fencing of races for stock control our responsibility to decide - generally won't be fenced. • Race berms for access, water management, cleaning will remain private access. • Most gullies won't be fenced as they only carry intermittent flows. • Stock will have access to graze this valuable grass, has benefit of controlling excess growth.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

71 B R Philpott

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Provide a more permissive approach to bridges including repair work.	<ul style="list-style-type: none"> • Flexibility needed to enable disturbance of banks and waterways during repair work e.g. repairing flood damage.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Provide a more permissive approach to crossings including repair work.	<ul style="list-style-type: none"> • Flexibility needed to enable disturbance of banks and waterways during repair work e.g. repairing flood damage.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Support	Provide a more permissive approach to repair work of bridges and other crossings.	<ul style="list-style-type: none"> • Flexibility needed to enable disturbance of banks and waterways during repair work e.g. repairing flood damage.

72 Simon Davies

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
49	Replaced provisions	Section 12.5 - Discharge of drainage water	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.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Needs to be amended [to say "including alluvium" rather than "excluding alluvium"].	<ul style="list-style-type: none"> • Alluvium build-up causes damming, subsequently flooding paddocks. • Flood water picks up contaminants and sediment. • Needs ability to maintain flood flow capacity of waterways. • Need tools to maintain waterways, then they can be fenced off. Protects waterway and water quality, but only if the water stays in the waterway.

73 Stephen Crawford

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Need to include a window over the winter period for livestock grazing on winter feed crops. The schedule of discharge for this window needs to be higher. Window needs to be from 1 June to mid August. Need to have consultation with community and stakeholders before anything in Schedule 16 is set.	<ul style="list-style-type: none"> • Proposed limits unachievable over winter when grazing stock on crops in certain weather conditions. • Too ambiguous - is the 12 hour window enough, what is a rain event (1 or 5 mm)? • Doesn't consider soil condition. • Lacks the balance required by RMA and does not consider Part 2, Section 5. • Schedule 16 limits unobtainable and economically out of reach for most of society.

74 Eric Hopgood

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Oppose the proposed plan change in general.	<ul style="list-style-type: none"> • Current Water Plan more than adequate to protect water quality. • Farmers don't want any more punitive rules and regulations placed on them.

75 Loganbrae Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Needs to be a discretionary activity.	<ul style="list-style-type: none"> • Graze cows/calves on some wetlands at low stocking rate. • Put minimal fertiliser on land. • Every farm has different circumstances and a lot of our swamp is at times dryland.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Don't think x hours after rain will always apply. Not practical to measure discharges. Lead in time needed to change from border dyking.	<ul style="list-style-type: none"> • Not practical to measure discharges. • Discharge can be caused by events other than rain e.g. Snow melt on neighbouring properties, run off from gravel roads. Have no control over these discharges and don't feel responsible for them. • Not wanting to be responsible for neighbouring dairying discharges.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Support.	<ul style="list-style-type: none"> • Cost of consent used to spend on structure.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Oppose.	<ul style="list-style-type: none"> • Not practical to fence every waterway. • Farm has numerous drains, ditches. • Have fenced Taieri River, but not practical to fence every hollow, drain, lagoon, ditch on a floodplain. • Fencing has tradeoff with weed growth and water being held back. • Have provided culverts and crossings but cannot guarantee stock use them.

76 Glen Ayr Ltd (D & C Dundass)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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. • Have minimal stocking rates (beef) and don't apply fertiliser.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Oppose.	<ul style="list-style-type: none"> • Not practical to measure discharges. • Discharge can be caused by events other than rain e.g. Snow melt on neighbouring properties, run off from gravel

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					roads. Have no control over these discharges and don't feel responsible for them.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Need clarification on what constitutes intensive stock activity close to water e.g. stocking rate.	<ul style="list-style-type: none"> • Our property is included in the significant wetland and bounds Taieri River, concerned about implications for significant wetlands. • Not practical to fence every waterway. • Have positioned many crossings but can't guarantee cattle will use them. • Have our stock crossings on high ground / natural stock routes to eliminate scouring. • Only graze in summer when it is dry - any flooding and all stock removed. • Agree there has to be a balance between water quality and farming close to water and waterways but needs clarification. • Currently fence of river with an electric wire but not practical to fence off every lagoon, ditch or hollow as these flats fill and dry continually.

77 Cross Family Trusts

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	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.
202	General opposition	Whole plan change (general opposition)	Oppose	Oppose Plan Change 6A.	<ul style="list-style-type: none"> • Proposed timeframe for change places inequitable financial burden upon pastoral farmers.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Proposed measures will devalue the Council's primary sector rating base value and inhibit development and enhancement of the region's resources. If significant financial assistance is not provided, proposed measures will devalue Council's primary sector rating base value and inhibit development and enhancement of the region's resources.
244	Alternative approaches	Other approaches	Not Applicable	No decision requested.	<ul style="list-style-type: none"> If significant financial assistance is not provided, proposed measures will devalue Council's primary sector rating base value and inhibit development and enhancement of the region's resources.

78 Jeff & Alison Thompson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	<p>More research needs to be done to ensure levels are going to be achievable for most farms within a reasonable cost.</p> <p>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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>More research needs to be done to ensure levels are going to be achievable for most farms within a reasonable cost.</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. 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.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>More research needs to be done to ensure levels are going to be achievable for most farms within a reasonable cost.</p> <p>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.
202	General opposition	Whole plan change (general opposition)	Oppose	Oppose the changes to plan change 6A (water quality).	<ul style="list-style-type: none"> Timeframes for implementation. Small capture dams should be permitted. Removal of mixing zones. Issues relating to the natural mixing of spring and surface water. Permitted levels of contaminants should be increased.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
236	Implementation	Transition times	Oppose	More time needed for farmers to a) fully understand new rules; b) collect data of current water levels.	<ul style="list-style-type: none"> • Timeframe for implementation of new rules too short. • Need more time to fully understand implications e.g. need time to collect data before and after wintering of cows in order to make changes / have information to make a submission suggesting suitable levels. • At least 12 months of data would give a realistic and accurate picture of what current water quality levels are at present.
237	Alternative approaches	Dams for collection and treatment	Not Applicable	Would like capture dams to be permitted to mitigate the effects of runoff - particularly in undulating farm land.	<ul style="list-style-type: none"> • Try hard to limit runoff but hard to do this on North Otago land forms. • Permitting small capture dams would capture and reuse irrigation water thus stopping nuisance to neighbours, make the most of the resource and capturing potential contaminants before they enter a waterway.
245	Other matters	Future plan changes	Not Applicable	Urban areas should also be held to the same standards for runoff / water contamination.	<ul style="list-style-type: none"> • No reason given.

79 River-Estuary Care: Waikouaiti-Karitane

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	In general supports Plan Change 6A.	<ul style="list-style-type: none"> • Positive change to better ensure protection of Otago waterways. • May allow for new innovative methods beyond the previously regulated ones.
211	Implementation	Compliance, enforcement, education	Not Applicable	The lead time to full compliance should be used as an active period with full engagement of council, landowners and communities to make sure this [plan change] works.	<ul style="list-style-type: none"> • If properly implemented, could allow for better stewardship by landowners, councils and the general public. • A lot will depend on good monitoring practices and vigilant effective compliance follow up.

80 Paul Crawford

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Local government making farming harder and harder. • Farmers want to look after the land so that their children can take over. • Pleased that ORC has not been unreasonable and rurally challenged like other councils. • Need to be looking at ways of increasing protein production off the land for NZ's economy while continuing to be environmentally aware.

81 Braemorn Farm Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> • Levels based on Canterbury work, no on-site scientific studies. • OVERSEER 6.0 unknown model at this time. • Existing farms in sensitive areas require large operational changes. • No study on economic effect. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

82 Roger Fox

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	[Rule 12.C.1.1 (ii) (a)] more than five hours. [Rule 12.C.1.1 (ii) (b)] more than 36 hours.	• With vegetation cover, water will still be carrying sediment at lesser time.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	[Condition under (ii)] should be 36 hours.	• With vegetation cover, water will still be carrying sediment at lesser time.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Relies too heavily on (OVERSEER 6.0). [Amounts in 12.C.1.3 (i) (a) and (b)] too low and unproven, particularly (a).	• More investigation, is it a sturdy tool? • Too low and unproven.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	[Distance in Condition (f)] should be 250 m.	• Depending on water velocity 100m is not realistic.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Should include alluvium.	• Alluvium can restrict flood carrying capacity of the bed.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Support	Support.	• Good.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Support	Support.	• Good.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Should be maintained.	• Important ORC function.
201	General support	Whole plan change (general support)	Support	This is generally a good plan but have issues with the [points raised in this submission].	• See other submission points.

83 Invernia Holdings Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Increase time period to at least 48 hours.	• Time period too short.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Increase levels [from 30kg/ha in (i)(b)] to a workable economic level.	• 30 kg/ha unachievable with present methods.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Irrigation runoff should be able to be collected and re-used.	• No reason given.
209	Discharge rules	Chapter 12 - general requests	Amend	Option 2 ["control discharges through resource consents" in section 5.5 of the Section 32 Report is supported].	• The Waitaki catchment is unique and should be separate from the rest of Otago.

84 Melvyn John Kington

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Reassess the levels set in Schedule 16 to ensure they are practical and achievable levels.	• Schedule 16 levels unachievable as per the information given out at ORC field days.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	• Levels based on Canterbury work, no on-site scientific studies. • OVERSEER 6.0 unknown model at this time. • Existing farms in sensitive areas require large operational changes. • No study on economic effect. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?

85 Tim Petrie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Reassess the levels set in Schedule 16 to ensure they are practical and achievable levels.	• Schedule 16 levels unachievable as per the information given out at ORC field days.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> Levels based on Canterbury work, no on-site scientific studies. OVERSEER 6.0 unknown model at this time. Existing farms in sensitive areas require large operational changes. No study on economic effect. North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?

86 N G Trevathan & M A Trevathan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Where land use remains the same landholders are not required to be involved with unnecessary paper shuffling.	<ul style="list-style-type: none"> If no evidence water degrading from existing practice, it is a waste of land owners' time and expense.

87 John McKenzie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> Levels based on Canterbury work, no on-site scientific studies. OVERSEER 6.0 unknown model at this time. Existing farms in sensitive areas require large operational changes. No study on economic effect. North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?

88 Alan L Wilson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Would like to see it amended in some way.	<ul style="list-style-type: none"> Small farm waterways, has constructed expensive stock water ponds in paddocks, almost impossible to comply with Rule 13.5A.0.1.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	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.
245	Other matters	Future plan changes	Not Applicable	If we [farmers] have to reach a certain standard regardless of cost then streams such as the Leith and Kaikorai should have to reach the same	<ul style="list-style-type: none"> Objects to singling out farmers for water quality control.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				standard.	

89 Ray Fox

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
248	Other matters	Supports another submission	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Support submissions made on my behalf by Lower Waitaki Irrigation Co and Federated Farmers [submitter numbers 106 and 278].

90 Kintyre Farms 2008 Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	That it reads "Long term grazing use and established farming practice should not be prohibited where this practice has not affected water quality in the river and the adjacent oxbows and back-washes."	<ul style="list-style-type: none"> • Farming Maniototo land adjacent to river for decades, use it for grazing in dry summer. • ORC-subsidised willow clearing and channel straightening in early 1980s benefited owners, enhanced productive value and use of low lying land adjacent to river. • Agricultural production will be lost, economic viability compromised. • Fencing river margin and monitoring adjacent grazing negates water quality concerns.

91 Mark Cain

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> • Levels based on Canterbury work, no on-site scientific studies. • OVERSEER 6.0 unknown model at this time. • Existing farms in sensitive areas require large operational changes. • No study on economic effect. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. What benefit from lower N levels and how long to achieve it?

92 E D Paton

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
240	Water discharges	Water discharges - general requests	Amend	<p>Reduce allowable water to run onto other properties.</p> <p>No irrigating with centre-pivots near streams.</p>	<ul style="list-style-type: none"> • Independent inspections for pipeline leaks. • Reduce irrigation when soil is wet. • Low land owners should not be responsible for problems caused by other irrigators. • All water used for irrigation to be measured daily (i.e. soil moisture).
244	Alternative approaches	Other approaches	Not Applicable	<p>To inspect stream for rubbish laying beside stream, i.e., old heaps of willows.</p> <p>All problems caused by irrigation should be addressed and paid for by those causing the problems and not the low land owners.</p>	<ul style="list-style-type: none"> • Have had electric fences wiped out by such rubbish.

93 A J & T T Verbakel

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	[Rule 12.C.1.3(i)(b) should be] 50 kg Nitrogen for Waitaki Plains area.	• Little change in Welcome Stream water quality over last 15 years, with significant increase in cow numbers.

94 Paul Corboy

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Support	Support PROVIDED that the sentence "where no measure has been taken to avoid sediment runoff" is retained and recognised.	• Farmers should endeavour to avoid runoff, but sometimes unusually heavy rainfall can overwhelm efforts.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Permit the use of suitable hard-bottomed fords for stock crossings of waterways on a casual basis.	• Can use hard-bottomed (rock or gravel) crossings with little effect on banks and bed. • Not for daily use, but as part of grazing rotation (every 2-4 weeks). • Cost of a bridge or culvert to enable crossing to a small land area could make its grazing uneconomic, with little environmental benefit.
201	General support	Whole plan change (general support)	Support	Support most of the main points of the Plan Change.	• No reason given.

95 Wallace Evan Strachan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	[Oppose 12 hours in Rule 12.C.1.2 ,re] (i), (ii) natural water runoff.	• 12 hours after rain ceasing ridiculous - on our farm natural runoff can continue for more than 5 days.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	[Rule 12.C.1.3(i)(b) should read] 45kg N/ha elsewhere in Otago.	• Graph trends for bore J41/0317 show decline over last 3 years.

96 Trevor Meikle

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend the nitrogen cap to a higher level to allow present day farming operations to be able to function successfully.	• Proposed nitrogen cap will impact negatively on future farming viability.

97 David Botting

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	On the whole support the Plan.	• Innovative approach. • Sediment runoff to waterways.
223	Alternative approaches	Riparian planting	Not Applicable	The Council should take ownership (e.g. responsibility) of the land that has been fenced from stock e.g. weed and pest planting and release spraying. Council staff, including the CEO, might spend a day a month out in the field doing riparian plant maintenance, or Fish & Game or Forest & Bird etc could be on projects.	• Farmers give up productive land for communal good, riparian planting requires lots of maintenance at a busy time of year, farmers don't have the expertise.

98 Val Ridge Farm Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend the proposed nitrogen cap to a higher level to allow present farming businesses to operate successfully.	• Proposed nitrogen cap will impact negatively on future farming viability.

99 Clive Blumden

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Agree with anything to do with cleaning up the waterways and rivers of our region.	• No reason given.
222	Beyond the scope	Beyond the scope - general	Not Applicable	Wish you to enforce the "don't use it lose it" rule [for water rights].	<ul style="list-style-type: none"> • Some irrigate only once a year, so that they can say they have used it. • Large farms fragmented into small holdings, on 'paper' no available water for them, but in reality more than enough because water rights not being used.

100 Duncan Henderson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Support	Do not change rule.	<ul style="list-style-type: none"> • Do not change new rules on Nitrogen and other fertiliser. • Leaching from old mining sites cause contamination.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	OK for intensive farming.	• Concerned this rule should apply only to intensive practice, but in future will be enforced to cover all livestock properties.

101 Ross A & Alexa Wallace

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	13.2.1.7B (b) unnecessary - remove. 13.2.1.7B (c) change 10 m to 12 m in length.	<ul style="list-style-type: none"> • (b) unnecessary, other clauses cover this. • (c) a lot of culvert pipes are 6 m long.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	13.5.1.1 (f) Amend 100 m to 250 m.	• More realistic to allow clarity to meet the required standard.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	13.5.1.2 (d) Amend 100 m to 250 m.	• More realistic to allow clarity to meet the required standard.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	13.5.A.0 Remove.	• Unnecessary and confusing as already covered by clause 13.5.1.8A.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Change the E-coli standard to 500.	<ul style="list-style-type: none"> • Testing records show E-coli limit of 126 is too stringent. • Clarification of whether the NNN limit is realistic.

102 Glenshee Station Ltd (P Hore)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	13.5A.0.1 Should become a permitted activity providing it does not cause or induce slumping, pugging or erosion.	<ul style="list-style-type: none"> • Otherwise impractical, would impact adversely on many day to day farming operations. • Not helpful in maintaining good water quality in extensive farming areas e.g. weed control.

103 Southern District Health Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	The separation of discharges from animal waste systems with drinking water bores should be	• Many small rural water schemes and domestic bores in Otago.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Controlled or Discretionary activities which then allows for consideration of the soil types, topography and protective structures around the bore.	• Use of 50 m distance without consideration for soil type, or short circuiting via surface or subsurface saturation, an unacceptable public health risk (supported by research - further information attached as appendix to submission).
211	Implementation	Compliance, enforcement, education	Not Applicable	That the ORC retains control of any auditing and compliance work.	• Unsure how ORC are going to achieve increased compliance work coming out of changes. • Audited self management is a tool that is being increasingly used to manage compliance costs and could be used given the volume of compliance work that will be generated.

104 Alan McMillan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	(c) Should also include reference to the "banks" of rivers and lakes.	• No reason given.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Amend	"Encourage" should be replaced with "enforce" or similar.	• "Encourage" far too soft.
30	Beyond the scope	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	Not Applicable	No decision requested.	• Changes to this section overdue. Lindsay Creek, Waters of Leith and Kaikorai Stream have all suffered in past.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Agree with exemption for occasional crossing.	• Raises questions about interpretation of 'crossing'. • Will prevent sedimentation and pugging but not prevent faecal contamination, e.g. underwater structures such as fords.
211	Implementation	Compliance, enforcement, education	Not Applicable	A specific program of monitoring is established by ORC, or an independent body, and rigorously enforced.	• Concept of reliance on self-monitoring is flawed.
224	Alternative approaches	Fencing	Not Applicable	Keeping all large farm animals out of these riparian areas by fencing must be a priority for your council in declaring it a prohibited activity.	• Large farm animals must be denied direct access to waterways in order to meet the characteristics for 'banks' outlined in Schedule 15.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	No recognition of this potential problem [intensive stocking] is apparent in the amendment, nor is a remedy suggested.	• Management of stock grazing rotation may reduce impacts of high contaminant concentrations from intensive stock numbers.

105 Alastair Rutherford

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Support	Keep as proposed.	• Best to have individuals and communities manage the effects.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Support	Keep as proposed.	• Best to have individuals and communities manage the effects.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	Keep as proposed.	• Best to have individuals and communities manage the effects.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Keep rule as proposed.	• Keeps it simple.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Keep rule as proposed.	• Keeps it simple.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Support	Keep rule as proposed.	• Keeps it simple.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Keep rule as proposed.	• Keeps it simple.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Support	Keep rule as proposed.	• Keeps it simple.
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Amend	Feel distance downstream should stay at 250 m.	• Fine silt in Lindis River colours water easily.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Support	Keep rule as proposed.	• Only practical solution as many high country water courses can't be fenced and aren't affected by stock.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Support	Keep rule as proposed.	• Practical solution.

106 Lower Waitaki Irrigation Company

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Recognise the Waitaki Plains as a special designated area and allow calculated nitrogen leaching to be greater than the proposed 30 kg limit per hectare per year.</p> <p>If science based evidence proves a need to convert from border dyke irrigation to spray irrigation then a long time frame be allowed.</p> <p>ORC to provide an accurate tool for arable properties to measure losses.</p>	<ul style="list-style-type: none"> • Support principle of effects-based plan. • Overseer is not configured to cope with arable properties, and version 6 currently unavailable to establish nutrient losses. • Use of Overseer not consulted on, not effects-based - current groundwater quality extremely good and area almost completely intensive dairy or dairy support. • Longer timeframes needed if major irrigation infrastructure change to the company water distribution network and financial investment required (9000 ha of Waitaki Plains, estimated \$50 million+). • Under border dyking, 30 kg unachievable without reducing stock numbers up to 40%. • Preliminary modelling shows targets unachievable under spray irrigation methods. • Health of Welcome Stream improving, supports salmon hatchery. • Waitaki River administered by Ecan, high volume river not affected by local activity in lower reaches. • Border dyking dilutes nitrates, concentration in aquifer lower due to assimilation. • Spray irrigation has greater carbon footprint, could affect planted amenity shelters. • Water use efficiency a separate issue. • One size fits all approach does not work for the North Otago area. • Limits will restrict production and harm the community, with no additional environmental benefit. • More research on state of Lower Waitaki Plains aquifer is needed.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support the principle of having an effects-based plan.	• Submission relates to administration of such a plan.

107 Daniel Groundwater

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading	Oppose	Delay implementation.	• To allow better research to be carried out for feasibility.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		permitted			

108 Graham A Keep

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Water quality needs to be maintained without too big an impact on farming.	• Farming needs to be a viable industry.

109 John Oughton

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Leave unchanged.	• Proposal will seriously impact on land-use in North-Otago and its economy.

110 Barry Fox

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Reassess levels set in Schedule 16.	• Unachievable to 95% of farmers.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Delay implementation.	• North Otago Volcanic Aquifer is not used for drinking water and goes straight to sea.

111 Phil James

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Change levels in Schedule 16.	• Make them more achievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Delay implementation until there is an economically viable means of implementation.	• On site scientific studies haven't been done. • Not feasible for majority of farmers.

112 Sarah Cooper

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Reassess levels set in Schedule 16.	• Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay implementation.	• Allow time for region/area specific research to take place.

113 Fiona Rudduck

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Reassess levels set in Schedule 16.	• Unviable constraints to most farmers' operations.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay implementation.	• Allow time for better research into environmental, economic and social impact.

114 Teviot Irrigation Company Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Amend Condition (e) to allow runoff water to be transported via races from one property to another with owner's consent.	• Proposed (e) prevents efficient irrigation operation picking up runoff and keeping discharges out of natural waterways. • Use of property boundaries inappropriate to schemes supplying 100 different types of irrigation operation. • Teviot Irrigation Scheme won't be able to operate.
201	General support	Whole plan change (general support)	Support	Generally supports the approach on the proposed plan change.	• No reason given.

115 Elderslie Dairy Farms Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Revisit standards on water quality and set them at a level landowners and farmers can attain in catchments and creeks while still making the practice of farming an economically viable one.	<ul style="list-style-type: none"> Proposed standards are unachievable even with changes to farming management, fencing and riparian planting.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Revisit standards on water quality and set them at a level landowners and farmers can attain in catchments and creeks while still making the practice of farming an economically viable one.	<ul style="list-style-type: none"> Proposed standards are unachievable even with changes to farming management, fencing and riparian planting.

116 Stewart Morrison

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	More time for research to be carried out on how limits will affect farming and on whether the proposed limits are set correctly.	<ul style="list-style-type: none"> All-Otago limit doesn't take into account differences between regions and farming systems. Time hasn't been taken to test or peer-review model.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Discharge to water should be averaged out as one discharge per farm not individual drains. Need information on the science behind the limits set.	<ul style="list-style-type: none"> Average discharges over whole farm (15 drains) for a more accurate measure of impact on water quality.
211	Implementation	Compliance, enforcement, education	Amend	Discharge to water should be averaged out as one discharge per farm not individual drains. Need more information on how to measure and where to measure.	<ul style="list-style-type: none"> Average discharges over whole farm (15 drains) for a more accurate measure of impact on water quality.
224	Alternative approaches	Fencing	Not Applicable	Support fencing of waterways.	<ul style="list-style-type: none"> Helps water quality in a number of ways.

117 Bob Hollamby

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Recognise the Waitaki Plains as a special designated area. Allow calculated nitrogen leaching to be greater than the proposed 30kg limit.	<ul style="list-style-type: none"> Nitrogen leaching limits not achievable due to border dyke irrigation. Stocking rate would need to reduce by almost 40%, making farms uneconomic. Design of Lower Waitaki Irrigation Scheme means conversion to spray not simple, requires more energy and will destroy biodiversity. Groundwater nitrate level half maximum drinking water standard despite intensive dairy activity; diluted by irrigation.

118 S A Hayes

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
248	Other matters	Supports another submission	Not Applicable	ORC should be guided by the Lower Waitaki Irrigation submission [submitter number 106] on proposed plan change 6A.	<ul style="list-style-type: none"> Represent families and farms most affected. They have researched, have local knowledge, taken expert advice, and are a very successful company.

119 PGG Wrightson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Nutrient and E coli runoff levels should be set across the board at 30 kgN/ha.	<ul style="list-style-type: none"> Allows good farmers to continue to operate and achieve good water quality. Need good practices but a level below 30 kgN/ha is unachievable.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Dairy industry should be well monitored and controlled, not ruined by unachievable laws.

120 A J & A J Anderson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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).
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>30 kgs be changed to 45 kgN/ha/yr elsewhere in Otago.</p> <p>Allow some margin for error until nitrogen leaching can be accurately assessed.</p>	<ul style="list-style-type: none"> No reliable way to accurately measure N leaching. Told border dyke irrigation can't comply with this rule. Changing irrigation system would be expensive, infrastructure wouldn't cope, and mean removing recently planted trees and shelter belts; for little gain in water quality. N leached is more diluted with flood irrigation. Decisions need to be measured, realistic and implemented over a period of time. Financial losses must be considered.

121 Michael Rawlinson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Maintain and strengthen to prohibit all unnecessary livestock access to the bed of any lake, river or wetland.	<ul style="list-style-type: none"> Livestock should be kept out of riparian strips and the bed of lakes, rivers and wetlands at all times.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Support	Maintain descriptions (in particular sediment and bank).	<ul style="list-style-type: none"> These are vitally important characteristics of a healthy waterway.
227	Prohibitions	Prohibitions - general requests	Support	Maintain 12.C.0 rules as proposed (in particular 12.C.0.4).	<ul style="list-style-type: none"> Sediment discharge has destroyed former high quality trout habitat in both branches of the Waikouaiti River.

122 Albert McTainsh

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	That Rule 13.5A.0 is not considered a prohibited activity, instead being a lesser activity status, restricted discretionary.	<ul style="list-style-type: none"> Concerned rule will be extended to cover all stock access to creeks Impractical and financially unfeasible to fence off creeks, susceptible to heavy rainfall and swelling.
202	General opposition	Whole plan change (general opposition)	Oppose	Oppose in general PPC6A.	<ul style="list-style-type: none"> Plan change not workable Concerned about the impact on farming operation.

123 Isbister Farms Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	A single nitrogen loading target of 30 kg/ha be adopted for the greater Kakanui catchment.	<ul style="list-style-type: none"> 10kg N loading limit unrealistic - would make my farming system untenable, reduce production value. Contrary to RMA and ORC objectives to set limits in a sustainable way. Based on a model not yet tested and peer-reviewed. Aquifer has nutrient contribution from the entire

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					catchment: two N levels disadvantage those in sensitive areas. <ul style="list-style-type: none"> Assess results of the actions farmers have already taken before setting targets that might be too aggressive/ unnecessary.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Oppose rule 12.C.2.1 and seeks its deletion.	<ul style="list-style-type: none"> Rule uncertain, measurement difficult. Extremely difficult to comply with Schedule 16 limits for Kakanui and Kauru Rivers.
220	Other matters	Process	Not Applicable	More time is allowed to conduct more research to support submission.	<ul style="list-style-type: none"> Not enough time given to make researched submission based on true consultative basis. Process rushed despite significant economic consequences for individuals and community.

124 Jane Young

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Simplifying and streamlining	Issue 7.3.1 - Large mixing zones	Support	Support the removal of this provision.	<ul style="list-style-type: none"> No reason given.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Suggest incremental introduction of quantitative turbidity limits and 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"> Lead-in times too long. Standards often qualitative not quantitative.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Suggest incremental introduction of limits and a shorter overall time frame. Remove reference to specific software.	<ul style="list-style-type: none"> Records of management practices should be compulsory so ORC has database for decision-making. Lead-in times too long. Overseer Version 6 likely to be out of date by 2019.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Support this being a permitted activity.	<ul style="list-style-type: none"> No reason given.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Support this being a permitted activity.	<ul style="list-style-type: none"> No reason given.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Amend to: "... is a permitted activity, providing the land owner can demonstrate that it does not..."	<ul style="list-style-type: none"> Standards often qualitative not quantitative - hard to determine if rules breached. Farmer should be one to show no environmental damage is being caused. Permitting stock crossing of any wetland not appropriate.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Delete 'or Regionally Significant Wetland' as a permitted activity for seasonal muster.	<ul style="list-style-type: none"> Permitting stock crossing of any wetland not appropriate.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	No decision requested.	<ul style="list-style-type: none"> Benefits of effects-based strategy which allows greater scope for innovation and autonomy. Issue around dependence on frequent expensive monitoring of discharges to met rules.
227	Prohibitions	Prohibitions - general requests	Support	Support 12.C.0 prohibited activities.	<ul style="list-style-type: none"> No reason given.
244	Alternative approaches	Other approaches	Not Applicable	Monitoring can only be done if there is sufficient financial support available both for ORC staff and individual farmers.	<ul style="list-style-type: none"> Success depends on frequent expensive monitoring of discharges, doesn't appear to be provided for.

125 Finlay Family Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delete 10 & 30 kg/ha nitrogen.	<ul style="list-style-type: none"> • Uncertain, measurement difficult. • Even if possible to measure, N loading limits unrealistic. • Contrary to RMA and ORC objectives to set limits in sustainable way. • Based on a model not yet tested and peer-reviewed. • Ignore the different regions and farming systems. • Not enough time has been given for researched submission and a truly consultative basis.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Delete 10 & 30 kg/ha nitrogen.	<ul style="list-style-type: none"> • Uncertain, measurement difficult. • Even if possible to measure, N loading limits unrealistic. • Contrary to RMA and ORC objectives to set limits in sustainable way. • Based on a model not yet tested and peer-reviewed. • Ignore the different regions and farming systems. • Not enough time has been given for researched submission and a truly consultative basis.

126 Hawea Community Association

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Hawea community supports the proposed plan change.	<ul style="list-style-type: none"> • Gives effect to the water quality strategy and requires active management of water. • Controlling pollution and allocation imperative to maintaining water quality and quantity.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	ORC follow its mandate and manages the Hawea aquifer and our lake and rivers so that there is no deterioration of water quality and that everyone gets their fair share.	<ul style="list-style-type: none"> • Main issue is changing land use due to increased population and dairy intensification. • What incentives for farmers to comply? Throughout NZ water continues to be polluted despite rules in place.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	Wish to see intensive dairy farming being treated as a discretionary activity until it is proven it can be managed otherwise.	<ul style="list-style-type: none"> • Oppose the fact that in the Groundwater Protection Zone septic tanks require consent but intensive farming doesn't.
244	Alternative approaches	Other approaches	Not Applicable	If we are committed to protecting our water then we must have constructive communication and cooperation between all parties.	<ul style="list-style-type: none"> • ORC and QLDC need to work together to ensure the aim of good water quality is met. • QLDC needs to recognise water quality and quantity in district planning and consenting.

127 Mt Aspiring Station

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	Support objective.	<ul style="list-style-type: none"> • Positive statement and the approach needed to achieve goals.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Delete the proposed 10 kgN/ha/year limit for Nitrogen Sensitive Zones until more research is done and more time is allowed to discuss realistic and feasible limits.	<ul style="list-style-type: none"> • On property, with zero nitrogen fertiliser additions and a conservative stocking rate, the limit is breached. • Limit has not been verified through the Overseer program. • Limits do not come into effect until March 2019 which gives plenty of time to do further investigation. • Even with 7 year transition which gives time to undertake research, wrong to set limits initially that are not substantiated and could prove inaccurate.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Support the approach of allowing permitted activities such as erecting stock bridges etc.	<ul style="list-style-type: none"> • Makes it easier for land managers to contribute to improving water quality.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance	Amend	Amend to a distance of 200 metres.	<ul style="list-style-type: none"> • A buffer of 150 to 200 m would differentiate between a

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		structures permitted			permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Amend to a distance of 200 metres.	<ul style="list-style-type: none"> • A buffer of 150 to 200 m would differentiate between a permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend to a distance of 200 metres. Amend time limit to 20 hours.	<ul style="list-style-type: none"> • Buffer of 150 to 200 m would differentiate between permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects. • Works often exceeds 10 hours due to complexity of the task. • Unlikely farmers will get required machinery in for only 1 day, 2 days more appropriate.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend to a distance of 200 metres. Amend time limit to 20 hours.	<ul style="list-style-type: none"> • Buffer of 150 to 200 m would differentiate between permitted activity causing "temporary" disturbance and consented activity causing major disturbance and significant effects. • Works often exceeds 10 hours due to complexity of the task. • Unlikely farmers will get required machinery in for only 1 day, 2 days more appropriate.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Add new (c) stating "Excluding when there are no practical, realistic & cost-effective alternatives that will allow the land manager to carry out their normal farming activities".	<ul style="list-style-type: none"> • Impractical and costly to establish and maintain bridges due to landscape. • QLDC classified main public road impractical and uneconomic to bridge. • Wanaka Lakes reported to have very good water quality despite 120 years of farming • No scientific evidence of cumulative effects of stock crossing on water quality in the Matukituki or the results that banning this will have. • Can maintain and improve water quality without banning stock crossings and associated expenditure.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	<p>Delay the date of notification in line with the timeframes suggested by Federated Farmers in order to allow for the following:</p> <ul style="list-style-type: none"> - Further research on smaller tributaries rather than relying on extrapolation from main stem rivers. - More testing to understand seasonal and "point of testing" variation to build a better picture of what realistic targets are. - Further consultation between the ORC and stakeholder groups. - Allow individual land managers to adjust their management practices to the targets. <p>Amend the Matukituki River to be exempt from turbidity measures until further research can be carried out to determine whether the Turbidity results tested were due to natural factors or human controlled factors.</p>	<ul style="list-style-type: none"> • Measures pushed through without appropriate investigation/discussion. • Despite very good water quality, only 12 to 80% of the sites in Wanaka lakes within target levels for different tests, standards set too low. • More investigation required to get appropriate standards. • Setting standards too low deters farmers from trying to meet them. • Creates distrust towards ORC, tarnishes future efforts to establish more realistic targets. • Matukituki catchment has significantly high natural sediment levels.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support overriding concept and use of effects	• General support but some areas (detailed in submission)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				based approach rather than controlling land use. Support the use of permitted activities for activities such as bridges in order to make it easier for land managers to contribute to improving water quality.	need to be further addressed.

128 Cath Gilmour

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Amend so that riparian strips are protected.	<ul style="list-style-type: none"> • Concerned about lack of riparian protection offered. • Water quality poorer where agriculture more intense e.g. dairying areas. • ORC should control impact of these activities on region's environment.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Amend so that riparian strips are protected.	<ul style="list-style-type: none"> • Concerned about lack of riparian protection offered. • Water quality poorer where agriculture more intense e.g. dairying areas. • ORC should control impact of these activities on region's environment.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	That differential standards be introduced for pristine water catchments.	<ul style="list-style-type: none"> • No distinction between pristine water catchments and those already degraded, allowing deterioration of cleanest waterways.
211	Implementation	Compliance, enforcement, education	Not Applicable	Enforcement and monitoring be actively undertaken by the regional council.	<ul style="list-style-type: none"> • Concerned about approach of permitting landowners to manage, meet standards or get consent rather than ORC actively applying and enforcing them. • By the time compliance undertaken, damage done.

129 Belmont

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
91	Discharge rules	Section 12.C - Other discharges	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. • Australian example shows unmaintained fencing adds to flooding problem (growth of gorse/weeds).
244	Alternative approaches	Other approaches	Not Applicable	Enforce lower water rates on steep hill country and steep land and should have to obtain consent for irrigation.	<ul style="list-style-type: none"> • Support clean water but can't accept benefit a person derives while causing cost to another.

130 Strathburn Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Site specific rules need to be considered. Leave the rules as they are for those with good quality water acknowledging our good practices and concentrate your efforts on the areas that are causing issues.	<ul style="list-style-type: none"> • The plan change as proposed imposes a unmeasurable standard and lacks balancing of environmental issues with economic, social and cultural issues. • Council is trying to fix a problem in some isolated areas by imposition of blanket rules. • Some rules are inconsistent with other provisions in plan while others impose extreme cost for insufficient reason. • Plan lacks clarity and balance. • Unfair without tools or sampling method. • If staff worked alongside farmers and understood what

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					we did better rules could be produced.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Council has failed to identify and consider other forms of means to encourage changes in land use management.	<ul style="list-style-type: none"> • Incorrectly based proposal on nature being always good and farmers always bad. • Balancing done by farmers in managing land and nature ensures good quality water.
248	Other matters	Supports another submission	Support	No decision requested.	<ul style="list-style-type: none"> • Supports submission by Federated Farmers and has not repeated it here for brevity [submitter number 278].

131 Grant Bradfield

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
54.1	Human sewage etc	54.1 Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, other specified contaminants, stormwater and from industrial and trade premises	Support	Support.	<ul style="list-style-type: none"> • No reason given.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	This needs clarification.	<ul style="list-style-type: none"> • Does this mean all waterways must be fenced?
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Clarification is needed as to whether this applies only to the application of nitrogen, fertiliser and effluent.	<ul style="list-style-type: none"> • If it applies to urine leaching there is little a farmer can do but destock. • Overseer not a suitable tool to be used in legal cases as accuracy is +/- 30%. • Is this rule necessary when NNN covered by Schedule 16.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Support.	<ul style="list-style-type: none"> • Important these structures encouraged to stop stock crossing through waterways.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Support	Support.	<ul style="list-style-type: none"> • Important these structures encouraged to stop stock crossing through waterways.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Support.	<ul style="list-style-type: none"> • Important these structures encouraged to stop stock crossing through waterways.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Clarification is needed as to what is the definition of a river.	<ul style="list-style-type: none"> • Small, flood-prone waterways may not be suitable for bridges or culverts.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	This schedule should be replaced.	<ul style="list-style-type: none"> • Limits set by ORC staff, not communities as promised. • Owaka catchment doesn't meet these standards. • ORC hasn't shown source of contamination, so are all farmers in catchment liable? • Unachievable, not based on science.

132 Andrew Jackson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Make the 30 kgs of N cover all the farm.	• Still need to winter stock.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Support.	• Good.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Good, but increase height to 2.5 m above creek bed.	• 1.5 m not enough in a small deep gully.

133 The Cow Farm Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Amend	Change the objective to provide guidance and quantifiable parameters for what 'good quality water' means. Change the objective to provide guidance and quantifiable parameters for what 'human use values' means.	• The term "good quality" vague and open to interpretation. • Does the term "human use values" include economic considerations?
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.	• "necessary" creates uncertainty - ORC could decide at any time, that water requires improvement, legislative framework could keep shifting.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Oppose	Delete this objective.	• ORC responsible for managing the effects of activities, not the community. • Vague and weak with no clear purpose.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Change Policy 7.B.1 to align with existing terminology.	• 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Oppose	Delete this policy.	• 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 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.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Oppose	Delete the policy.	• Vague and unclear, uses non-RMA terminology. • "Assimilate" open to interpretation, doesn't provide any guidance or measurable framework.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Amend	Support with amendments.	• 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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	Oppose	Delete Policy 7.D.1.	• Impractical to require quality standards on discharges at the point of discharge. • Conflicts with RMA, which allows for a reasonable zone of mixing.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Oppose	Delete this policy.	• Steps (a)-(b) predetermine outcome of consent applications. • Consent may sometimes be appropriate where the

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					costs/effects of complying with Schedule 16 outweigh benefits. <ul style="list-style-type: none"> • 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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, no case-by-case assessment undertaken, breaches conditions of natural justice. • Contrary to purposes and principles of RMA.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					sediment discharges a prohibited activity in some circumstances.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Withdraw Rule 12.C.1.3 and the associated maps until clear robust science can justify its inclusion.	<ul style="list-style-type: none"> • Overseer version 6 not currently available. • Other software may be equally useful. Rule should refer to system outcome rather than specifying a particular one. • Requirement for sensitive areas to meet 10 kg/ha not realistic or achievable. • No clear evidence or science in S32 Report to supports the 10 kg/ha figure for nitrogen sensitive areas. • The application of a more stringent 10 kg/ha requirement where there is no issue with water quality, while areas of concern (South West Otago and Dunedin) are not subject to this requirement, is not fair or just. • Generic figure doesn't take into account soil type, pasture development, climate or on-farm management. • Adjacent properties could be subject to very different requirements, without any direct scientific evidence to support the application rates. • Economic implications for nitrogen sensitive areas include economic unviability, lower property values and lower economic activity. • All rural land users could potentially require consent to apply fertiliser. Practical implications of this have not been made clear. Potentially significant compliance issues with rural-based industry. • The requirement for the majority of farmers to get consent onerous and unfair - science does not exist to justify this approach. • Rule does not indicate whether the application rates apply on a per hectare basis, on a per hectare across one property basis, or a per hectare across a specific catchment basis.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	Amend the rule to quantify what level of discharge is considered appropriate rather than using a generic distance requirement.	<ul style="list-style-type: none"> • Generic 50 m requirement potentially allows significant contaminant discharge as permitted activity, • Unclear how it relates to prohibited Rule 12.C.0.5. • Activities not considered on basis of actual and potential effects, inconsistent with RMA. • No reasonable justification for 50 m separation.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Amend the rule to provide better clarity and some measureable targets.	<ul style="list-style-type: none"> • "No change to water level or hydrological function" are generic terms and not effects-based. • No consideration for naturally fluctuating water levels where such changes may not have adverse effects but for which consent would be required. • No evidence that Schedule 16 based on robust science. • Rule doesn't differentiate between water bodies which would not be affected by minor discharges.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Amend the rule to provide a clear definition of appropriate terminology.	<ul style="list-style-type: none"> • The term "water supply transport system" undefined and unclear.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants	Amend	The rule should be amended to be consistent with	<ul style="list-style-type: none"> • Item (b) directly conflicts with Policy 7.D.3.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		restricted discretionary		Policy 7.D.3.	<ul style="list-style-type: none"> Contaminants may exceed the limits but this does not mean an adverse effect will result.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be clarified to have measurable targets.	<ul style="list-style-type: none"> Rule will not allow activities that create minor and temporary changes. Higher threshold than some permitted activities (suction dredge mining, people and vehicles crossing waterways).
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Oppose	Delete rule.	<ul style="list-style-type: none"> Activity already provided for by 13.5.1.8A.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	<p>Amend rule to provide measurable parameters.</p> <p>Clarify the rule in relation to ephemeral beds of rivers.</p> <p>Clarify what a seasonal muster is and when it can occur.</p>	<ul style="list-style-type: none"> Prohibited activity status too restrictive, does not allow assessment on a case-by-case basis, or for emergency situations. Not clear what effect is mitigated by this rule Exclusion of seasonal mustering allows interpretation. No differentiation between livestock type, numbers or size of water and captures ephemeral water bodies which is nonsensical.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	The targets should be developed in consultation with stakeholders and should be withdrawn until such time as practical, science based targets can be imposed.	<ul style="list-style-type: none"> Targets do not take into account natural differences in each environment. No scientific justification for generic standards; no evidence that water quality will be improved as a result of the restrictions. No logic behind target dates; no evidence of adverse effects if dates are not complied with.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Oppose.	<ul style="list-style-type: none"> Discharge limits appear arbitrary and lacking science. No evidence these limits achieve the purpose of the RMA.
202	General opposition	Whole plan change (general opposition)	Oppose	That ORC withdraw PC6A until clear, accurate and reliable rules can be implemented and after appropriate consultation with industry personnel has occurred.	<ul style="list-style-type: none"> Support intent to improve water quality. Shortcomings are significant, widespread and will potentially undermine entire rural sector. Targets and limits appear arbitrary, onerous, inflexible and unfounded. No supporting evidence produced to support their inclusion, use of a one size fits all approach takes no account of naturally variable environments. Section 32 report lacking in specific scientific data, so rules appear frivolous and lacking in clear and precise thought. Targets should be based on achievable, clear data and achieve the purpose of the RMA. Lack of effective community consultation especially with industry organisations.

134 M B & J A Mitchell

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Mitigating circumstances can occur.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	These proposals should be delayed till there is much better understanding of these issues.	<ul style="list-style-type: none"> A lot unknown about different fertilisers and what benefit or uptake by plants.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Did not specify	No decision requested.	<ul style="list-style-type: none"> How much water makes a river? What is a stream? Can stock cross naturally to eat? Many areas have natural streams where stock and wildlife cross. Streams a natural water supply for stock.

135 Foxhaven Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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 of mitigation will have a detrimental effect on cash flow. Uncertainty as to what mitigation might be required under each circumstance.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	That Rule 12.C.1.3 is deleted and that the per hectare limits on nitrogen be removed from the plan. That the use of Overseer as a monitoring/measurement/compliance tool is removed from the plan.	<ul style="list-style-type: none"> Doubts the science behind the margins and limits. May have to destock despite investment in efficient spray irrigation and become unviable. Appreciate the need to manage N appropriately: we take steps to reduce potential nutrient loss. Serious concerns with the use of OVERSEER to model N loss from property and/or using it for any compliance.
132	Permitted contaminant discharges	I series maps	Amend	[If Rule 12.C.1.3 not deleted] That Foxhaven Farms is removed from the sensitive N zone on the relevant planning maps [I1 Kakanui-Kauru Aquifer].	<ul style="list-style-type: none"> Property is in nitrogen sensitive zone in unrealistic way - farm is allowed 10 kg but 1m over boundary is permitted 30 kg. Unclear how margins and limits were developed as theoretically property is in 10 and 30kg zones.

136 Mount Gowrie Station

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	Oppose any interference with cultivation.	<ul style="list-style-type: none"> Already mitigate risk.
222	Beyond the scope	Beyond the scope - general	Not Applicable	There needs to be water storage dams or reservoirs put in place on farms. Surplus to minimum water can be taken from rivers and streams. This water can be used for irrigation rather than taking from creeks and rivers, when water levels are already at their prudent recovery levels.	<ul style="list-style-type: none"> ORC too lenient with resource consents, allowing irrigators to pump water when rivers are struggling.
224	Alternative approaches	Fencing	Not Applicable	In favour of fencing around small tributaries or riparian areas.	<ul style="list-style-type: none"> No reason given.

137 P J & A M Neame Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	This rule should be changed to, "If the crossing or passing complies with the Clean Streams Accord, it shall be deemed an acceptable activity".	<ul style="list-style-type: none"> Every case is different; impractical to treat every lake, stream and river crossing in the same manner.

138 Waitaki District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Oppose	Oppose.	<ul style="list-style-type: none"> The term 'noticeable effects' is too subjective and open to misinterpretation.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Oppose	Delete or revise.	<ul style="list-style-type: none"> Overly stringent. "Odour" in this prohibited activity is not defined.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Clarity needed otherwise culverts may require resource consent.	<ul style="list-style-type: none"> Rule 13.2.1.7 removes 'culvert' from being permitted, and it is not clear if 'crossing' in 13.2.1.7B allows for culverts.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Amend	No decision requested.	<ul style="list-style-type: none"> Rule title has "repair, maintenance" but none of the subsequent rules include these as permitted activities. Rule 13.1.1.1 (c) provides for a structure to be in good repair", therefore is contradictory if repair works are not permitted.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Support	Support amended rule.	<ul style="list-style-type: none"> Ten consecutive hours was overly restrictive.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Support	Support amended rule.	<ul style="list-style-type: none"> Ten consecutive hours was overly restrictive.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Support	Support amended rule.	<ul style="list-style-type: none"> Ten consecutive hours was overly restrictive.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Support	Support amended rule.	<ul style="list-style-type: none"> Ten consecutive hours was overly restrictive.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	<p>Support the overall objectives of improving water quality in the Otago region for the environmental, cultural and recreational benefits.</p> <p>Concerned the manner proposed to manage water quality will have a significant detrimental effect on region's ability to deliver on economic outcomes.</p>	<ul style="list-style-type: none"> PPC6A doesn't acknowledge or take into account economic and social considerations. Measures go far beyond those required to achieve stated environmental results.
227	Prohibitions	Prohibitions - general requests	Amend	Rules need to be rewritten to include subordination to the permitted and discretionary rules.	<ul style="list-style-type: none"> Wording of rules implies precedence over all the other rules: all discharges covered by this section would be prohibited, regardless of the proposed permitted and discretionary rules.

139 Clutha Agricultural Development Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	Wording of 12.B.1.1 should read - "...by a person who holds a current qualification for the application of agricultural chemicals."	<ul style="list-style-type: none"> • Equivalent qualifications acceptable for agrichemicals handling aside from Growsafe.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Amend	Term "floatable material" needs clarification or definition.	<ul style="list-style-type: none"> • Not clear whether "floatable material" includes leaves and twigs.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Clarification of whether the values should never be breached in any test.	<ul style="list-style-type: none"> • Denies natural variations and ignores difficulties and inaccuracies involved in one-off testing as shown in research.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	<p>Oppose the standards proposed.</p> <p>Ask farmers to ensure that water leaving the farm is of better or equivalent quality to that which enters the farm, rather than suggesting absolute water quality levels.</p>	<ul style="list-style-type: none"> • Gives farmers responsibility to take actions which are within their power and is truly effects based approach. • "Hard and fast levels" covering all environments and circumstances are problematic and unrealistic. • Mitigation methods such as riparian strips and wetland areas could be discouraged under a fixed absolute standard e.g. Water won't meet the standard on entry to a treatment wetland.
211	Implementation	Compliance, enforcement, education	Not Applicable	<p>Emphasis should be solely on the quality of water measured in waterways, not in water that may get into waterways.</p> <p>Acknowledge that spot checks will not be used against farmers who may in all respects be following 'best on-farm practice' to minimise damage to water quality.</p> <p>Farmers would like assurance that these rule changes will be fairly applied across all water management situations, urban and rural.</p>	<ul style="list-style-type: none"> • Effects should be monitored, rather than particular practices that may affect water quality. • Research shows one off sampling doesn't accurately show health status or understanding of the complex chemistry / natural variables involved. • Random and unfair 'example setting' will alienate farmers. • Concerns about the likely fairness in the administration and enforcement of PPC6A.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	<p>Support for the merits of an effects-based approach over the rules/consents based approach.</p> <p>Emphasis for Council monitoring and enforcement should be solely on the quality of water measured in</p>	<ul style="list-style-type: none"> • Concerned about use of prohibitions. • Farming becomes problematic with prohibition of farming practices that may cause water quality degradation. • Effects of activities should be prohibited not the potential effects.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				waterways, not in water that may get into waterways. Urge a continuation of a co-operative approach with all but the most intransigent of farmer polluters.	<ul style="list-style-type: none"> • Consistency of effects-based approach needed. • Recent improvements in water quality haven't been made through unrealistic regulation that 'best practice' couldn't meet or put them out of business. • Throughout the consultation process, ORC indicated there would be monitoring and measurement tools for farmers. No such tools have been indicated.
248	Other matters	Supports another submission	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Have discussed plan change and issues with CDC. • Support CDC's submission points [submitter number 308].

140 Otago Conservation Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	Supports Policy 7.B.2.	<ul style="list-style-type: none"> • No reason given.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Withdraw Plan Change 6A; or amend the provisions in Rule 12.C.1.3 to clarify whether resource consent is required if the nitrogen tests are failed, or if what is proposed is prohibited.	<ul style="list-style-type: none"> • The proposed change could lead to the deterioration of water quality in Otago. • If discretionary consent is required, the rules should clearly state the matters to which the Council will restrict its discretion. • Rules should clarify whether the proposal is prohibited or consent is required.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Matters of discretion listed under Rule 12.C.2.1 need to recognise that a discharge to land that is greater than the allowed standard may prove a better solution than discharge to water.	<ul style="list-style-type: none"> • The proposed change could lead to the deterioration of water quality in Otago.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Withdraw Plan Change 6A; or amend Schedule 15 to better reflect the differing receiving environments and the issues they face using historic monitoring records to set specifically targeted limits and goals for the improvement of each waterway.	<ul style="list-style-type: none"> • Supports the use of descriptive characteristics. • Limits too low for some waterways and could lead to the deterioration of water quality in Otago. • Implementation timeframes and standards should take into account TA plans for ongoing maintenance and upgrading of their water treatment plants.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Withdraw Plan Change 6A; or amend Schedule 15 to better reflect the differing receiving environments and the issues they face using historic monitoring records to set specifically targeted limits and goals for the improvement of each waterway.	<ul style="list-style-type: none"> • Supports the use of descriptive characteristics. • Limits too low for some waterways and could lead to the deterioration of water quality in Otago. • Implementation timeframes and standards should take into account TA plans for ongoing maintenance and upgrading of their water treatment plants.
202	General opposition	Whole plan change (general opposition)	Oppose	Oppose Plan Change 6A in its current form and seek the amendments discussed in submission.	<ul style="list-style-type: none"> • PPC6A creates potential for deterioration in water quality in Otago and therefore fails to meet the objectives of NPSFW.
211	Implementation	Compliance, enforcement, education	Not Applicable	Withdraw Plan Change 6A; or provide clear and consistent guidance and support for landowners to ensure delivery, including a clearly stated plan for and schedule of compliance audit monitoring by Council.	<ul style="list-style-type: none"> • Concern with effects-based strategy, which is reactive. Reactive approach seems to accommodate protracted and incremental deterioration of water quality. Only proactive regulation of polluting land-use activities can prevent deterioration of water quality. • Reliance on individual landowners to maintain accurate records and undertake appropriate monitoring. • Without clear and consistent guidance compliance and monitoring process will be overly complex for landowners. • Could lead to the deterioration of Otago's freshwater habitats, ecosystems and species.
226	Managing the effects of land use on	Land use controls	Not Applicable	Only by proactively regulating those land use	<ul style="list-style-type: none"> • Reason given in decision requested.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality			activities that pollute our waterways can the ORC prevent the deterioration of Otago's freshwater quality.	

141 Eloise Neeley

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Would like to see a longer lead in time for the requirements to keep Overseer records and more work done on the expected impacts to the region, both in water quality and economic.	<ul style="list-style-type: none"> • Enforcement of this rule is a blunt instrument to effect change. • 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.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Increase the lead in time for the adoption of Schedule [15] and ensure that the standards are realistic and achievable.	<ul style="list-style-type: none"> • Current proposal has far reaching effects on farming viability and doesn't provide sufficient time to modify farming or know how such modification should occur.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Increase the lead in time for the adoption of Schedule [16] and ensure that the standards are realistic and achievable.	<ul style="list-style-type: none"> • Current proposal has far reaching effects on farming viability and doesn't provide sufficient time to modify farming or know how such modification should occur. • Even with best practice, some farmers will fail to meet the requirements on their farms.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Revisit the proposed water plan changes to ensure that while we continue to achieve continued improvement in the state of our water that the plan change will not result in significant economic impacts on all who live in Otago.	<ul style="list-style-type: none"> • Approve initiative to allow farmers to make their own decisions by measuring effects rather than imposing onerous consent requirements. • Doesn't provide enough certainty and confidence in compliance with changes with the current monitoring tools. • ORC doesn't know how changes will impact on the agricultural sector.

142 Korteweg Family Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
139	Permitted contaminant discharges	J series maps	Amend	Alter to include correct boundaries (line which follows the road from the Railway Bridge along the Kaitangata highway, turning left onto Storer Road and right onto Lakeside Road to Kaitangata).	<ul style="list-style-type: none"> • Map leaves out the Delta land on the northern side of the Clutha River between Clutha Railway bridge to Kaitangata. • Area is of the same soil type and farmed in the same way as its neighbouring delta land on Inch Clutha and Paretai. • Line proposed is used by the Animal Health Board.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support and applaud the initiative in giving urban and rural sector the opportunity to take ownership of their discharges to waterways and how they manage them.	<ul style="list-style-type: none"> • Prefers this approach to that of other councils.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Did not specify	Major concern is whether we can realistically achieve the objectives set out by the ORC regarding nutrient loadings.	<ul style="list-style-type: none"> • Concerned about remaining commercially competitive and viable. • When things go wrong as a result of weather conditions there is no or little provision for avoiding an infringement fine or court action.
248	Other matters	Supports another submission	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Fully support Federated Farmers submission. • Is a member and had input into the submission.

143 M L & P J Lord Family Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	<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> <p>Adopted rule with amendments.</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?
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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> <p>Adopted rule with amendments.</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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	<p>Amend schedule 16 to make the limits more achievable and amend the lead in times for achieving the limits to give farmers more time to ensure that they are investing in the right tools to achieve the limits.</p> <p>Review limits in terms of whether they are achievable and make full assessment against the economic impacts of the limits.</p>	<ul style="list-style-type: none"> • 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	<p>Review limits in terms of whether they are achievable and make full assessment against the economic impacts of the limits.</p>	<ul style="list-style-type: none"> • 2 standards for whole of Otago is too simplistic. • Changes required to meet the limits through irrigation conversion or de-stocking could result in loss of jobs and viability of farming operations especially farmers in a

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Assess the impacts of the limits on farmers and whether or not the limits need to be applied across all parts of Otago. Increase the limits, particularly in the sensitive zones and in parts of Otago where the combination of soil types and irrigation systems causes 30 kg Nitrate/ha/yr to be unachievable.	sensitive zone. • Larger question of water quality has not been put side by side with the cost of implementing proposed standards.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	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.	• 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.
202	General opposition	Whole plan change (general opposition)	Amend	Oppose the plan change in part. Want Council to rethink the plan change to achieve standards that a first world country desires/deserves, while allowing for the ability to farm in an economically viable manner.	• Cost of the Plan change may be more than individual farmers and communities can sustain (loss of jobs and production).
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support the overall concept of the plan. Supports use of permitted activities.	• Concerned that costs to some individuals and communities will be too great.

144 W L Hamilton

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	12.C.1.3 (i) should state "latest version of Overseer". 12.C.1.3 (i)(b) should state "40kg nitrogen/ha/yr".	• Overseer is in development. • Allows more intensification and production in relatively safe areas.
201	General support	Whole plan change (general support)	Support	Support Plan Change 6A with suggested amendments to 12.C.1.3 (i) - reference to latest version of Overseer- and (i)(b) - reference to 40kg Nitrogen/ha/yr.	• No reason given.

145 New Zealand Pork Industry Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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."	• Term 'good' too subjective, unless directly referenced to parameters in Table 15.1 - Schedule 15.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Oppose	Delete Objective 7.A.2.	• Term 'good' too subjective, unless directly referenced to parameters in Table 15.1 - Schedule 15.
18	Managing effects of land use on water quality	Section 7.B - Policies general	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".	• Term "noticeable" too subjective, applied without reference to Schedule 15.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Support	Retain intent of the Policy.	• Supports recognitions that not all industries/land uses will meet requirements of Schedule 16 within timeframes, more time may be needed to undertake change.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Support	Retain the intent of the Policy.	• Some industries may require more time to develop technology or innovation to make an activity compliant.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Support	Retain Rule 12b.1.5(d).	• No reason given.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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"	• Clarifies rule only covers discharges to land that fall outside the parameters of Rule 12.C.1.2 with reference to Schedule 16.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Support	Retain Rule 12C.1.1 (ii).	• Transition period should be retained.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Remove reference to 'Version 6' from the rule. Retain the reference to 31st March 2019. Add the following to Rule 12.C.1.3: iii) Activities which cannot be modelled by Overseer will have an exemption from points (i) and (ii) of this rule. a) Once a new activity is included into Overseer the activity will be provided with a 7 year transition phase before having to meet the requirements of (i) (a) and (b).	• OVERSEER regularly updated, will be superseded by 2019. • Retaining 31 March 2019 provides a transition phase. • Number of land uses currently can't use OVERSEER or have a significant degree of uncertainty surrounding nutrient budgets produced (e.g. Outdoor pig production, discharge of solid manure or litter to land) which impacts on the ability to know if systems are compliant.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Support	Retain Rule 12.C.1.4.	• No reason given.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend 12.C.2.1(i) to state: "Where changes to land management or infrastructure have been unsuccessful in meeting the limits in Schedule 16 or Rule 12.C.1.3, and the discharge first occurred prior to March 2012; or..." Retain the following statement as proposed: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule". Amend glossary to define what is meant by "short-term".	• Leaching of N outside rate defined in Rule 12.C.1.3 should be made restricted discretionary if discharge first occurred prior to 31 March 2012. • Some industries cannot model N leaching using OVERSEER are unable to determine compliance.
130	Permitted contaminant discharges	Fertiliser - Glossary definition	Amend	Amend as follows: "Fertiliser - Any proprietary substance specifically manufactured for use in increasing the nutrient status of land. Excludes effluent or seaweed."	• Remove compost as it is a treated product used to increase nutrient status of land.

146 Dairy NZ Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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:	• 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?

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				"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"> Narrative descriptions not backed with numerical definitions.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Oppose	Delete the objective.	<ul style="list-style-type: none"> Provides no additional guidance than RMA and RPS. No guidance to "where necessary".
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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"> 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	Did not specify	No decision requested.	<ul style="list-style-type: none"> Deleting 7.7.5 but not 7.7.6 appears contradictory.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human	Amend	Specific policies are needed to provide the necessary framework for appropriate permitted and prohibited activities.	<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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		sewage, hazardous wastes and stormwater, and from industrial and trade premises)		Delete the policies [7.D.1 - 7.D.3] 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".	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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"	• 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"
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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..."	• Standards difficult to meet. • Many small discharges would not be justified. • No technical publication justifying standards. • Common practice to specify maximum total suspended solids.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Withdraw Rule 12.C.1.3 and the associated Maps 11 - 16. ORC should initiate a collaborative process with a broad range of stakeholders to develop a rule that is more technically robust and has broad community support.	• Permitted activity maximum nitrogen leaching rate rule based on Overseer is appropriate but current rule too deficient. • Inappropriate discretion by ORC to determine compliance. • Using one model version which is not operational is uncertain and inappropriate. • Would version 6 be available when model updated. • Insufficient analysis on proposed zone boundaries. • More technical assessments needed for appropriate thresholds.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Need to specify loading limit based on receiving water quality. • Need a qualified person to undertake Overseer. • Need clarification on limits applying as whole property average. • No clear framework for resource consents.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	Change the rule to incorporate a maximum daily discharge quantity and to remove any possible contradiction with Rule 12.C.0.5.	<ul style="list-style-type: none"> • Could allow contamination of water supplies. • Discharge limit to be base on science and range of potential hydrogeological settings in Otago.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Change the rule to remove the reference to Schedule 16. Change the rule to remove the absolute requirement for "...no change to the water level or hydrological function..."	<ul style="list-style-type: none"> • Schedule 16 extremely difficult to meet. • Not justified to ensure attainment of receiving water standards. • Clause (ii)(a) "no change" prevents the rule having any actual application.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Include a definition of "water supply transport system"	<ul style="list-style-type: none"> • Term not defined.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Delete this rule and replace it with a permitted activity rule. Change the wording of clause (i) to make it clear that this would only apply to discharges that were legally authorised prior to 31 March 2012.	<ul style="list-style-type: none"> • Rule more effective and efficient if permitted activity. • Not appropriate for unauthorised discharge to be restricted discretionary and have notification precluded.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Change this rule to remove the absolute references and replace them with independently verifiable standards such as a maximum turbidity change.	<ul style="list-style-type: none"> • Literally no reduction in visual clarity allowed. • Any disturbance would not be permitted. • Provide certainty that rule does not apply unless significant adverse effects.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Oppose	Delete this rule.	<ul style="list-style-type: none"> • Provided for in Rule 13.5.1.8A.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Change this rule to specify independently verifiable standards such as a maximum turbidity change. Change the reference to "seasonal muster" and replace with more specific quantifiable limits that would ensure the attainment of a numerical water quality objective.	<ul style="list-style-type: none"> • Absolute prohibition is not justified based on environmental outcomes. • Potentially unnecessary expenditure to land owners.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Change the plan to provide a clear implementation method that provides support for voluntary and/or regulatory codes of practice or standards that would assist in the achievement of specified environmental outcomes.	<ul style="list-style-type: none"> • Benefit to collaboratively developing codes of practice and standards. • Potentially used as regulatory provisions.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Withdraw this table.	<ul style="list-style-type: none"> • Replaced with clear narrative and numerical standards. • Need to develop with input from Otago community.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Withdraw this table.	<ul style="list-style-type: none"> • Complementary analysis needed to determine appropriate standards. • Technical report needed to provide evidence for foundation of rules. • Withdraw until worked collaboratively with community.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	The schedule and associated maps should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> • Don't understand logic behind discharge limits. • No technical report that rationalises limits or locations. • Withdraw until collaboratively worked with community.
132	Permitted contaminant discharges	I series maps	Oppose	Withdraw Maps I1-I6 associated with Rule 12.C.1.3.	<ul style="list-style-type: none"> • Insufficient analysis on proposed zone boundaries. • Map resolution not sufficient • Map must be of detail so stakeholder knows where rule

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
139	Permitted contaminant discharges	J series maps	Oppose	Maps associated with Schedule 16 should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> applies. Resolution inadequate for stakeholders to know where discharge limit area.
202	General opposition	Whole plan change (general opposition)	Oppose	Withdraw as soon as possible until a more collaboratively based water quality management plan for Otago is developed and the issues identified in this submission are addressed.	<ul style="list-style-type: none"> Uncertain environmental outcomes. Uncertainty for stakeholders. Interpretation of the objectives, policies and rules. Inconsistency with the Regional Policy Statement. Water quality targets and standards. Derivation of numerical water quality targets or standards.
209	Discharge rules	Chapter 12 - general requests	Amend	Include a rule for proposed or existing activities that would otherwise default under section 87B of the RMA to be discretionary activities, with some specific guidance on what applicants need to do to obtain a resource consent.	<ul style="list-style-type: none"> No guidance for resource consent applications.
227	Prohibitions	Prohibitions - general requests	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 objective attainment".

147 Pioneer Generation

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1.1	Simplifying and streamlining	Section 7.1 - Introduction	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.1 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.2 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.

Ref	Issue	Provision	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).	
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	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 ..." Any similar amendments to like effect. Any consequential amendments that stem from the amendment set out above. That the term 'good quality water' be deleted from Section 7 (Water Quality).	<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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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: (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"> • 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. • No consideration of social and economic costs resulting from removal of mixing zones.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.	<ul style="list-style-type: none"> • 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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	<p>That the Rules under 12.C governing the discharge of contaminants to water from dams are better linked, such that (i) the relationship between Rule 12.C.1.6 and the other rules listed under Section 12.C are clearly defined, and that (ii) any non-compliance with Rule 12.C.1.6 is clearly linked to a supporting rule that provides for the discharge as a controlled activity.</p> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment set out above.</p>	<ul style="list-style-type: none"> • Deletion of rules 12.12.1.1 and 12.12.2.1 may result in hydropower being caught by new 12.C provisions. • Activity status not clear. • Needs more transparent link between rules and activity classifications. • Discharges from dams to be controlled activity.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	That the term 'good quality water' be deleted.	<ul style="list-style-type: none"> • Overly simplistic and unlikely to be useful. • Open to divergent interpretations.
203	Simplifying and streamlining	Removal of issues - general requests	Oppose	<p>That Section 7 (Water Quality) include an Issues section, which set out the key resource management issues to be addressed by the objectives and policies. The issues section must give effect to, and thus be consistent with the policy outcomes provided for within the NPS FM and the RPS. The Issues to be addressed should include:</p> <ol style="list-style-type: none"> 1. The effects of non-point source discharges on water quality; 2. The need to control the effects of land use intensification on water quality; 3. The cumulative effects of proposals to discharge, both on their own and/or in combination with other discharges; 4. Contaminants not always being discharged to the most appropriate receiving environment. <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment set out above.</p>	<ul style="list-style-type: none"> • Section 7 not supported by discussion on key issues guiding policy framework. • Issues set the tone on why matters need addressing.

148 Glenshee Station Limited (Marks & Mouat)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	<p>That Plan Change 6A be rejected in its entirety.</p> <p>Without limiting the scope of the submission, the following parts are opposed in particular Objective 7.A.1, Objective 7.A.2, Objective 7.A.2, Objective 7.A.3, Policy 7.B, Policy 7.D, Rule 12.B, Rule 12.C.</p>	<ul style="list-style-type: none"> • Rules are not best method to achieve objectives. • Rules don't allow individuals/communities to manage effects. • Does not recognise on farm solutions i.e. Riparian planting. • Some terms unclear i.e. "natural and human use values" • If to address effects of dairy need to be more clear. • Great expense for compliance to be achieved. • Areas of land no longer able to be utilised. • Plan does not provide for social and economic wellbeing.

149 Ernslaw One Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
18	Managing effects of land use on water quality	Section 7.B - Policies general	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Support	Retain current wording, but 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"> • (b) Reflects the inherent variability in sediment yield from forestry. • Positive effects of forestry on sediment control and influence of natural sediment yield.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
30	Beyond the scope	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	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.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
91	Discharge rules	Section 12.C - Other discharges	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.	<ul style="list-style-type: none"> • Can't accurately determine if a discharge triggers the rule or not.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	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.

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Ref	Issue	Provision	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.	• Would be both consistent and aligned with the new Horizons One Plan rules.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Retain current wording.	• Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Align the proposed rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	• The bridge section of the manual gives specific guidance on bridge installation to allow both flood flows and floating logs without hitting the structure.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend the proposed rule to be a permitted activity to be informed by Appendix E: Priority Decisions For Installation of a New In-Stream Structure from Boubee, J. et al 1999. Fish Passage At Culverts - A review, with possible solutions for New Zealand indigenous species 62p.	<ul style="list-style-type: none"> • Proposed rule not consistent with good forest engineering practice. • Sometimes need to impede upstream passage of predatory fish to protect upstream endangered indigenous fish habitat.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a	Amend	Delete the word 'maintenance' from Rule 13.3.	• Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		structure			• Maintenance should be permitted activity.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	• 100 m stringent compared to other plans, neither sufficient nor realistic in practice.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	• 100 m stringent compared to other plans, neither sufficient nor realistic in practice.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	• 100 m stringent compared to other plans, neither sufficient nor realistic in practice.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12, to be informed by the recommendation of the Land and Water Forum, and aligned.	• Recognise importance of Schedule 15 but oppose stringent turbidity units and their impact on forest owners. • LAWF recommends community consultation when setting limits (catchment by catchment basis).
131	Other matters	Minor and consequential changes	Amend	Seek such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	• As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> • Supports intent to address declining water quality. • Doesn't practically allow for primary production operations, such as forestry, to continue operations if permitted rules not met. • If not permitted become prohibited, even if all practicable measures have been taken to mitigate, remedy or avoid effects. • Undertake their operation in accordance with Environmental Code of Practice for Plantation Forestry 2007 (awarded Best Planning Document of the Year by the Resource Management Law Association in 2009). • NZ Forest Owners Association forest road engineering manual due for release in July 2012. Contains best practice and guidance on erosion and sediment control. • Maintains their own Environmental Management System. • Without substantial modification, the forestry industry will be required to comply with unrealistic standards, that are not achievable even in undeveloped, pristine catchments.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> • Support efforts to address contaminants in runoff, drainage and leaching. • Support approach to effects-based management instead of controlling land use activities.
227	Prohibitions	Prohibitions - general requests	Amend	Remove prohibited activity status from the rules in PPC6A and replace it with Controlled Activity status for activities that are non-compliant with Rule, as per MfE's proposed Plantation Forestry NES.	<ul style="list-style-type: none"> • RMA enables people to undertake sustainable activities. • If forestry cannot meet permitted then likely to be prohibited. • Plan change prevents resource consent application. • Prohibited status only used when effects cannot be avoided, remedied or mitigated. • Insufficient justification to use prohibited status and inconsistent with case law. • Out of proportion to potential adverse effects. • Fails to account beneficial environmental effects. • Initiate private plan changes. • Significant departure from approaches used elsewhere.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> • Insufficient consideration given to the impacts on forestry sector. • Fails to provide a default standard in event of non-compliance.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					• Need to provide clarity and certainty.

150 Dean McNeilly

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Support the Otago Regional Council's proposed rules which set standards controlling nitrogen, phosphorus, bacteria and sediment released from rural drains and through runoff and leaching.	<ul style="list-style-type: none"> • Concerned about deteriorating water quality. • Regularly observes Clutha district waterways and rural land management practices.

151 Grant Isbister

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	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.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Want catchment based load limits to be set at a realistically achievable level.	<ul style="list-style-type: none"> • Even when farmers fence off ditches, limits not achievable. • Use results from tests carried out on fenced dairy farm ditches to determine realistic load limits.
202	General opposition	Whole plan change (general opposition)	Oppose	Strongly oppose the new Water Quality plans in their current form.	<ul style="list-style-type: none"> • Unachievable for farmers. • Unrealistic nature will have massive detrimental financial impact on farmers, causing negative flow on effect to region.

152 Trust for the estate of W J Johnston

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Did not specify	Support reducing sediment through direct drilling and better management practices.	<ul style="list-style-type: none"> • No reason given.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	A nutrient loading level target of 30 - 40 kg/ha to be adopted for the entire Kakanui and Kauru catchment area.	<ul style="list-style-type: none"> • 10 kg/ha unrealistic, based on untested model. • 10 kg/ha doesn't account for differences in regions and farming, creates winners and losers. • Little time allowed to make a researched, consultative based submission on the figures. • 10 kg/ha is contrary to RMA and ORC objectives, to set limits in sustainable way. • 10 kg/ha will limit future farming options and negatively affect land values. • The 2 nitrogen loading levels disadvantage land users in the sensitive area, unreasonable and unnecessary as entire catchment contributes to nutrients in the Kakanui-Kauru aquifer.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Oppose section 12.C.2.1 and seek its deletion.	<ul style="list-style-type: none"> • Rule uncertain, measurement difficult. • Discharge influenced by upstream factors. • Very difficult to comply with limits in Schedule 16 for Kakanui and Kauru rivers.
224	Alternative approaches	Fencing	Not Applicable	Support fencing of waterways where practical.	<ul style="list-style-type: none"> • ORC policy to allow meandering rivers while doing little or no flood protection maintenance work. • Flooding causes channel movement, making permanent fencing difficult. • Do not like to fence swimming holes as it restricts public access.

153 Run 248m Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	This rule should be deleted particularly for pastoral farming.	<ul style="list-style-type: none"> Impossible for large pastoral farming operations to continue. Vast areas with numerous streams impossible to fence. Fencing causes more soil disturbance than it reduces, and changes landscape. Stock cross for health checks, drenching, shearing.
202	General opposition	Whole plan change (general opposition)	Oppose	Oppose the regional water plan proposed plan change 6A and in particular rule 12.C.0.4 and 13.5A.0.1.	<ul style="list-style-type: none"> Rules are draconian, economically unsound and ill advised.

154 Shalloch Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Change the limit in (i)b from 30kgN/Ha per year elsewhere in Otago and include different limits more specific to specific regions or aquifers.	<ul style="list-style-type: none"> 30kgN/Ha limit should not be Otago wide. Should be different limits more specific to specific regions or aquifers. Dairy farm on Waitaki Plains extensively rebordered, use all best management practices still would not meet 30kg limit. Overseer does not calculate different irrigation efficiencies of border dykes. Cost of converting to spray \$1-1.5 million, with loss of wetlands and shelter trees.

155 Corona Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Feel more work needs to be done on what well run modern border dyke systems can achieve.	<ul style="list-style-type: none"> Won't be able to continue to use border dykes. Annual rebordering 5-10% of farm, considerable expense, use less water therefore less runoff. Not enough time to plan for long-term expenditure. Efficient modern borders a better solution than electricity-consuming pivots.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Agree with the philosophy of the change.	<ul style="list-style-type: none"> Less nutrients in waterways. More work needed on what modern border dyke systems can achieve. Not enough science invested in plan change. Would like to see border dyke watering still being a viable system.
220	Other matters	Process	Not Applicable	Disagree with the timeframe and process of calculating what is acceptable.	<ul style="list-style-type: none"> Not been adequate notice (between public meetings and closing date of submissions) to calculate what will land uses changes will be required to comply with the proposed plan and to calculate the costs associated with this.

156 Andrew & Barbara Richardson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Improvement in the science behind the decision-making. Collection of more current and historical	<ul style="list-style-type: none"> Support prevention of increasing nitrogen in groundwater.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				data on groundwater nitrate levels). A sliding scale of leaching allowed over time to give more time for change.	<ul style="list-style-type: none"> Disappointed with standard of science used to back decisions. Stronger reliance on factual information needed and less reliance on modelling. More data should be collected in the future to monitor change in groundwater nitrate. 30 kg/N will be a challenge for some lower Waitaki Plains farms and will involve a significant cost to convert from border dyke to spray irrigation.

157 Nigel de Geest

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
132	Permitted contaminant discharges	1 series maps	Did not specify	Would like to see more clarification and information on what methods were used to achieve what appears to be inconsistency within these zones [1 Kakanui-Kauru Aquifer].	<ul style="list-style-type: none"> On the map the submitter's property located above the aquifer, while land next door with identical make-up isn't.
219	Rural water quality strategy	Overall strategic approach	Amend	Very supportive of what Council is trying to achieve however do believe the bar has been set too high in regard to discharge limits.	<ul style="list-style-type: none"> Has environmental farm plan for sheep and beef farm on the Kakanui River, but still won't meet the discharge limits.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Amend.	<ul style="list-style-type: none"> The bar has been set too high. Current sheep and beef farming practices using environmental plan will not meet discharge limits.

158 Ranui Partnership

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.

159 Gerard Booth

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Oppose	This rule should be delayed until more environmental and economic research has been done.	<ul style="list-style-type: none"> More research needed.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	Oppose this rule at this stage.	<ul style="list-style-type: none"> Should be more investigation, too many unknown circumstances.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Oppose	Revisit.	<ul style="list-style-type: none"> Standards unachievable.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Needs to be reassessed to make sure the standards are achievable.	<ul style="list-style-type: none"> Standards may be unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Needs more scientific research and economic analysis.	<ul style="list-style-type: none"> More analysis needed.

160 Ruth McNamara

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
211	Implementation	Compliance, enforcement, education	Not Applicable	Voluntary testing should not be allowed. Mandatory 3 year testing of properties by ORC staff, and registers kept of all the properties and the results of the tests so that checks are followed up on until they meet the required standards.	<ul style="list-style-type: none"> More ORC input needed for testing of non-point source water quality, land management. ORC to oversee what is happening before contaminants get to waterway. No township in Central Otago should have to boil water. Time to rectify any problem.

161 Sam Kane

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Adopt a blanket discharge limit of 50kg N/Ha/year until there is sufficient science to support lowering the limit.	<ul style="list-style-type: none"> • Proposed limits arbitrary. • Practicality of using Overseer questionable.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Delete.	<ul style="list-style-type: none"> • Insufficient science-based evidence to support limits. • No framework for holistically assessing cumulative impact, and what is an appropriate individual and collective discharge level that balances environmental, social and economic needs.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Crossing stock across rivers/lakes must be a permitted activity. Exist elsewhere in the plan proviso's to ensure that this activity does not have substantial negative impacts on the environment.	<ul style="list-style-type: none"> • Incorrect to assume that crossing stock causes damage.

162 John Latta

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	(b) Should be deleted.	<ul style="list-style-type: none"> • Steep sided gullies or creeks often have a stream bed much deeper than 1.5m below the top of its banks. • Height of crossing should have no impact on water quality.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	100 metres should be 400 metres.	<ul style="list-style-type: none"> • Very difficult to have no short-term visual clarity impact for only 100m if creating a new culvert. • Short term effect for long-term improvement.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm	Amend	100 metres should be 400 metres.	<ul style="list-style-type: none"> • Very difficult to remove material and not impact short-

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		event permitted			term visual clarity. • Where possible, mechanical cleaning should work down the stream, not up it.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	100 metres should be 500 metres.	• 100 too short for temporary visual clarity impact if major remedial work required. • Flood mitigation work may be required, overall downstream effect less than subsequent flood erosion/deposition.

163 Matuanui Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
92	Discharge rule framework	12C Note box - How the rules apply	Support	Retain note box.	• Agree reclamation and deposition associated with in-stream works should be addressed in Chapter 13, reduces consenting costs, red tape.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Clarify what 'measure' is needed to meet this rule, who is expected to take these measures and how can they be policed.	• Waterways currently don't meet proposed standards. • Realistic goals needed for successful change.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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).	• Agree leachates shouldn't get to water, but in adverse weather with best practice, cannot guarantee they won't. • No recognition of natural processes.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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. - 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.	• 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.	• 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?
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Clarify the following: - What is a discharge of nitrogen from land to groundwater i.e. Does this only apply to fertiliser and effluent applications over a shallow aquifer? - Why Overseer is being used to control discharges to groundwater when it is designed to calculate losses below the root zone? - How Overseer is to be applied e.g. whole farm vs. block vs. paddock.	• Some aquifers mapped, but in some cases groundwater very deep and fertiliser not getting there. • Rule appears to apply to all farming including wintering even though I don't apply nitrogen or effluent. • Queries if a cost/benefit analysis has been undertaken to determine how much change is needed, and if it is achievable. • Limits could ban some farming practices such as wintering, conversion, intensification or border-dyking.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				- The relationship between 12.C.0.2 and 12.C.0.3 - if I meet Overseer, but actual sample breaches the Schedule 16 limits, what happens? Provide evidence that 10 & 30 are justified and achievable. Clarify.	
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Oppose	Oppose.	<ul style="list-style-type: none"> • Waterways lifeblood of farm which we respect and want to keep for future generations. • Owaka doesn't have a reticulated water scheme as naturally available in streams and creeks. • Crossings constructed and maintained for generations to aid this.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow for situations where it is not feasible to put in a stock crossing and stock movement is needed outside of seasonal muster.	<ul style="list-style-type: none"> • Fencing necessary in some situations, but can be impractical e.g. paddock has stream and three tributaries, impractical to alter winter stock rotation or removing natural stock drinking water.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Remove discharge limits from Schedule 16 until a catchment study and community consultation has been undertaken to determine realistic, appropriate, achievable limits for the different catchments.	<ul style="list-style-type: none"> • Farm on tile drains, need to see data and research to have confidence that limits are achievable, and we can continue farming. • Public meetings and information received indicated that community values and practical farming ideas would be included in catchment consultation, this hasn't happened. • Limits aren't achievable, realistic for our area.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	The ORC ideas to monitor farming practice is in the best interests of our future generations however the aggressive changes proposed in this document are unrealistic and not sustainable for the owner operated farmer.	<ul style="list-style-type: none"> • Agree with aim to maintain and enhance water quality. • Agree with permitted activity approach. • Significant concerns with practicality of sampling and achievability of Schedule 16 discharge limits.

164 Strath Taieri Community Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	ORC needs to withdraw the plan change and start communicating effectively with landholders as to better means to maintain and improve water quality and in that process consider a variable plan change that considers areas of high water quality have a lower standard of control reflecting current good management practice and consider rules only to be implemented where land use changes are undertaken.	<ul style="list-style-type: none"> • Agree with the general purpose of the plan change, to ensure retention and improvement of high quality water. • Water quality in our area good, unless there is proof of degradation (or potential degradation) then current practices should be considered acceptable, with recognition given to good land managers. • Require farming for social values and infrastructure. • Little environmental gain to mitigate unrealised threat. • Potential long term effects of intensification and/or change of land use to defray expensive fencing costs. • Plan change unclear and subject to strict interpretation. • Imposes too great a burden without balancing social and economic matters. • Water quality measures not easy or realistically measurable. • Some water degradation is from the natural processes of waterways and might not be caused by farming practices. • Unclear as to how water degradation is to be measured.
248	Other matters	Supports another submission	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Has seen some parts of the Federated Farmers and DCC submissions and support them [submitter numbers

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					278 and 211].

165 Jim Gibson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	No change to the N leaching until good scientific figures can be proved especially for arable cropping.	<ul style="list-style-type: none"> • Need scientific evidence. • Current production should be provided for. • Overseer version 6 not yet available, so uncertainty in what is being proposed.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Object to flawed proposal to allow the "community" to decide the quality of water.	<ul style="list-style-type: none"> • Views of non-farming community will stifle farming. • Reasonable view from all parties needed.

166 Hunter Valley Station Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	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.

167 James Watt

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Remove clause (b). Definition of "river" needed.	<ul style="list-style-type: none"> • Unnecessary restriction.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	[Amend to] Clarity beyond a distance of 250 m.	<ul style="list-style-type: none"> • 250 m is workable, practical and possible.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	[Amend to] Clarity beyond a distance of 250 m.	<ul style="list-style-type: none"> • 250 m is workable, practical and possible.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	[Amend to] Clarity beyond a distance of 250 m.	<ul style="list-style-type: none"> • 250 m is workable, practical and possible.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Remove.	<ul style="list-style-type: none"> • Unnecessary. • Contradicts Rule 13.5.1.8A.

168 Dawn Dunjey

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure these are practical and achievable.	<ul style="list-style-type: none"> • Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are	<ul style="list-style-type: none"> • Levels set based on Canterbury study, no onsite scientific studies undertaken.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				completed.	<ul style="list-style-type: none"> • OVERSEER version 6 currently an unknown model. • Existing farm operations in sensitive areas unable to continue. • Large changes in farm operations required. • No economic effects studies completed. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. • Queries benefit of and time to lower nitrogen levels in this aquifer.

169 Sydney Mann

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Did not specify	When stock wanders into rivers - Council will prosecute.	<ul style="list-style-type: none"> • Recommended by experts.

170 Tony Hughes

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Support all the rules and want the ORC to get on and implement them.	<ul style="list-style-type: none"> • Better to have some rules in place for everybody to work with, rather than current situation where everybody has a different interpretation of what needs doing.

171 J N & J M Lawson Family Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	There should be no compulsion to fence both sides of rivers or waterways where extensive grazing occurs - e.g. hill country - in the future.	<ul style="list-style-type: none"> • Fence repair after flooding. • Weed control (e.g. gorse, broom) where it takes over fenced off edges of waterways. • Gorse leaches more nitrate into water than extravagant fertiliser use.

172 Peter George

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
211	Implementation	Compliance, enforcement, education	Not Applicable	Larger fines and more rural inspections.	<ul style="list-style-type: none"> • Waterways being ruined for profit. • For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated. • Ignorance not an excuse.
222	Beyond the scope	Beyond the scope - general	Not Applicable	More regulation of water use by farms and limiting supply as well as charging for irrigation that is often excessive.	<ul style="list-style-type: none"> • Waterways being ruined for profit. • For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated. • Ignorance not an excuse.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	Limits on stock numbers.	<ul style="list-style-type: none"> • Waterways being ruined for profit. • For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated. • Ignorance not an excuse.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Far tighter limits on discharges.	<ul style="list-style-type: none"> • Waterways being ruined for profit. • For too long farmers had no incentive to improve methods, cleanliness or water use, need to be controlled and educated. • Ignorance not an excuse.

173 Ross Hay

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure that they are practical and achievable.	• Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> • Levels set based on Canterbury study, no onsite scientific studies undertaken. • OVERSEER version 6 currently an unknown model. • Existing farm operations in sensitive areas unable to continue. • Large changes in farm operations required. • No economic effects studies completed. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. • Queries benefit of and time to lower nitrogen levels in this aquifer.

174 Niere Kitson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure that they are practical and achievable.	• Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> • Levels set based on Canterbury study, no onsite scientific studies undertaken. • OVERSEER version 6 currently an unknown model. • Existing farm operations in sensitive areas unable to continue. • Large changes in farm operations required. • No economic effects studies completed. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. • Queries benefit of and time to lower nitrogen levels in this aquifer.

175 Logan Sopson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure that they are practical and achievable.	• Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> • Levels set based on Canterbury study, no onsite scientific studies undertaken. • OVERSEER version 6 currently an unknown model. • Existing farm operations in sensitive areas unable to continue. • Large changes in farm operations required. • No economic effects studies completed. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. • Queries benefit of and time to lower nitrogen levels in this aquifer.

176 Barry Diedrichs

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure that they are practical and achievable.	• Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading	Amend	Delay the implementation of this rule until further	• Levels set based on Canterbury study, no onsite

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		permitted		environmental and economic studies are completed.	scientific studies undertaken. <ul style="list-style-type: none"> • OVERSEER version 6 currently an unknown model. • Existing farm operations in sensitive areas unable to continue. • Large changes in farm operations required. • No economic effects studies completed. • North Otago Volcanic Aquifer not used for drinking, discharges to sea. • Queries benefit of and time to lower nitrogen levels in this aquifer.

177 Ewing Farms Ltd & Haddington Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Need benchmarks that are attainable for specific - these need to be discretionary.	<ul style="list-style-type: none"> • Standards unattainable for many, may force people out of business or their homes. • Need benchmark to work towards, not against. • Defeats the purpose if everyone gets around problem by applying for consent.

178 J R Hill

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	To allow water to be used in this way [runoff is used to irrigate at different levels, through water races].	<ul style="list-style-type: none"> • Is an irrigator on a company scheme, use runoff water for further irrigation through races. • Has been occurring for many years. • Encourage the continued efficient (re)use of water.
201	General support	Whole plan change (general support)	Support	Generally support the approach taken by the Otago Regional Council.	<ul style="list-style-type: none"> • No reason given.

179 Gilbert Black

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	(b) The top of the crossing is no higher than 1.5 metres above the normal water surface level where it is located.	<ul style="list-style-type: none"> • Best place to locate bridge is where water deepest. Water runs slowest at this point, allows more capacity under bridge during floods and reduces likelihood of erosion.

180 Dan Smale

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
209	Discharge rules	Chapter 12 - general requests	Amend	Would like the plan changed so that non-point source discharge rules and regulations apply not only to horticulture practices (i.e. dairying) but also explicitly stated that they also apply to mining and industrial processes.	<ul style="list-style-type: none"> • No reason given.
211	Implementation	Compliance, enforcement, education	Not Applicable	Monitoring of water quality be expanded to look at water quality indicators related to mining and industrial discharges - where and when needed.	<ul style="list-style-type: none"> • No reason given.

181 Terisha Hubbard

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
223	Alternative approaches	Riparian planting	Not Applicable	Would like the ORC to rule that any person who has a waterway (stream or river) running through their property provide a revegetated strip as a natural barrier and filtration area of 5 metres (or preferably	<ul style="list-style-type: none"> • Waterways polluted, biodiversity degraded, natural areas lost. • Dogs and children can no longer swim, drink or play in many areas.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
224	Alternative approaches	Fencing	Not Applicable	10 metres wide) on each side of the waterway. Would like the ORC to rule that any person who has a waterway (stream or river) running through their property fence this stream off so that no farm animals can get into the stream.	<ul style="list-style-type: none"> Waterways polluted, biodiversity degraded, natural areas lost. Dogs and children can no longer swim, drink or play in many areas.

182 Quambatook Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure that they are practical and achievable.	<ul style="list-style-type: none"> Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> Levels set based on Canterbury study, no onsite scientific studies undertaken. OVERSEER version 6 currently an unknown model. Existing farm operations in sensitive areas unable to continue. Large changes in farm operations required. No economic effects studies completed. North Otago Volcanic Aquifer not used for drinking, discharges to sea. Queries benefit of and time to lower nitrogen levels in this aquifer.

183 Trevor Stanger

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure these are practical and achievable.	<ul style="list-style-type: none"> Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> Levels set based on Canterbury study, no onsite scientific studies undertaken. OVERSEER version 6 currently an unknown model. Existing farm operations in sensitive areas unable to continue. Large changes in farm operations required. No economic effects studies completed. North Otago Volcanic Aquifer not used for drinking, discharges to sea. Queries benefit of and time to lower nitrogen levels in this aquifer.

184 Kate Streeter

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Reassess the levels set in Schedule 16 to ensure these are practical and achievable.	<ul style="list-style-type: none"> Unachievable.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delay the implementation of this rule until further environmental and economic studies are completed.	<ul style="list-style-type: none"> Levels set based on Canterbury study, no onsite scientific studies undertaken. OVERSEER version 6 currently an unknown model. Existing farm operations in sensitive areas unable to continue. Large changes in farm operations required. No economic effects studies completed. North Otago Volcanic Aquifer not used for drinking, discharges to sea. Queries benefit of and time to lower nitrogen levels in

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					this aquifer.

185 Windsor Park Dairies Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Oppose the proposed plan in regard to the level of E-Coli, NNN, DRP, NH4, TURB. More time and testing will show what is achievable therefore more realistic.	<ul style="list-style-type: none"> • Encouraging to allow innovation to meet goals. • Place emphasis on sustainability and have a well managed dairy farm (see photos and graphs attached to submission) • Limits unachievable, current best practice fails - shown by ORC testing results from our farm site. • Unrealistic levels will be to the detriment of the industry, community and economy.
237	Alternative approaches	Dams for collection and treatment	Not Applicable	Review legislation regarding capture dams and recycling of the water stored in the capture dams.	<ul style="list-style-type: none"> • Multiple low risk potential contamination has the effect of high risk. • Solutions include multiple sediment traps, track margins, cut offs, but pose ongoing issues. • Irrigated rolling country with high water holding capacity results in many springs and small waterways. • A better solution in some situations is a capture dam, to prevent contaminants entering larger waterways. • On farm innovation. • Water from the capture dam should be able to be used on farm.

186 Mitchell & Webster Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
18	Managing effects of land use on water quality	Section 7.B - Policies general	Support	Support the implementation of this rule.	<ul style="list-style-type: none"> • Support principle of improving water quality and maintaining waterways.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	That this rule be not implemented until further thorough studies and investigation of the consequences of the limits suggested in the plan are evaluated based on science, the environment and the economics of the related regions.	<ul style="list-style-type: none"> • OVERSEER version 6 currently an unknown model. • OVERSEER does not currently work for cropping farmers or market gardeners. • There is a lack of knowledge on the soils overlaying some of the aquifers. • Levels set based on Canterbury study, no onsite scientific studies undertaken. • North Otago Volcanic Aquifer not used for drinking,

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					discharges to sea. <ul style="list-style-type: none"> • 10 kg N/ha rarely achieved, would require huge changes in farming practices (not minor changes as suggested). • No economic effects studies completed.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Support	Support the principle of allowing permitted activities with conditions that relate to that activity.	<ul style="list-style-type: none"> • Saves consents, bureaucracy and time, lets land owners get on with activities.
243	Bed disturbance	Chapter 13 - general requests	Support	Supports the implementation of this rule.	<ul style="list-style-type: none"> • Saves consents, bureaucracy and time, lets land owners get on with activities.

187 Alliance Group Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1.1	Simplifying and streamlining	Section 7.1 - Introduction	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.
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Oppose	Retain original Objective 7.5.1 without amendments.	<ul style="list-style-type: none"> • 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
18	Managing effects of land use on water quality	Section 7.B - Policies general	Amend	Add the following Objective (or similar): "7.B.6 Recognise that discharges to the region's waterways can 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."	<ul style="list-style-type: none"> • Recognise and provide for positive benefits of discharges.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
38	Simplifying and streamlining	Section 7.9 - Anticipated environmental results	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Inclusion enhances understanding and implementation of various provisions.
52	Discharge rule framework	Sections 12.A – 12.C - Introduction to discharges of contaminants or water	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.
91	Discharge rules	Section 12.C - Other discharges	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.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	That it is removed from Plan Change.	<ul style="list-style-type: none"> • Not most appropriate way to achieve purpose of RMA. • Impractical and arbitrary. • No consideration given to temporal variability, exceptions. • No assessment provided of how characteristics or exceptions derived. • If a catchment does not achieve its targets, it doesn't mean that a discharge would have adverse effects on the water body. • Application should be able to be made on a case-by-case basis.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Table 15.2 should be removed 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.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Ensure the discharge limits proposed are consistent with achieving sustainable management and are not based on singular ecological or environmental premise.	<ul style="list-style-type: none"> • Limits exceptionally low, unnecessary where assimilative capacity of receiving water sufficient to avoid adverse environmental effects beyond a mixing zone. • No explanation in Section 32 for how discharge limits established, if they are based on comprehensive scientific

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					analysis, or take into account existing environment and broader elements of sustainable management (as noted in preamble of NPSFW). <ul style="list-style-type: none"> • Need certainty that limits will achieve sustainable management (human use and environmental values). • Make information available to submitters regarding how discharge limits devised, and provide opportunity to submit on discharge limits having regard to that information.
131	Other matters	Minor and consequential changes	Amend	Such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	<ul style="list-style-type: none"> • As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	As a first priority, Proposed Plan Change 6A should be withdrawn.	<ul style="list-style-type: none"> • Considerable uncertainty with what is trying to be achieved through the plan change, and its implementation. • Unnecessary complications for its operations, and for other rural industries. • Balance not achieved as required by section 5(2) RMA. • Significant amendments are required should the Plan Change be adopted.
209	Discharge rules	Chapter 12 - general requests	Amend	Retain Principal Reasons for the rules in Section 12, and develop new Principal Reasons to justify the proposed rules.	<ul style="list-style-type: none"> • To provide certainty. • In accordance with RMA Section 67(2)(c).
227	Prohibitions	Prohibitions - general requests	Oppose	Remove the proposed prohibited activity rules in Section 12.C.	<ul style="list-style-type: none"> • Proposed rules are uncertain and inappropriate. • No limits or triggers to assess compliance or allowance for mixing zone, therefore inconsistent with RMA sections 5(2) and 107(1) and (2).

188 Raymond Grant Tisdall

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Plan change risks the very lifestyles and land use that has maintained the water quality in the area.	<ul style="list-style-type: none"> • Local waterways in good condition, existing practices can maintain this. • Imposes greater cost on sheep farming, which has least impact on water quality, and is best suited to our area. • Only the impact on one wellbeing has been considered (out of environmental, social, economic and cultural). • ORC has not sufficiently communicated the effect of the plan change, documentation vague and unclear. • Fencing major work, requires unaffordable water reticulation - little gain as water already high quality. • Fencing will create waterway problems such as overgrowth, blockages, blowing out, erosion. • Fencing will lead to drastic changes in land use - including intensification to cope with costs. • Fencing will impede recreational access to waterways. • The standards are unfair - cannot measure or check them, may be unaware and not at fault for a breach, but still liable. • Plan change has to work for both small and large landholders. • Plan change risks the very lifestyles and land use in area that currently maintain good water quality. • Most properties in my area are farmed in harmony with water plan aspirations.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • There are no incentives to improve behaviour, and no reward for those already doing a good job for water quality.

189 Lovells Creek Farm Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Amend rule to a distance of 250 metres downstream.	<ul style="list-style-type: none"> • More realistic value.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend rule to a distance of 250 metres downstream.	<ul style="list-style-type: none"> • More realistic value.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend rule to a distance of 250 metres downstream.	<ul style="list-style-type: none"> • More realistic value.

190 Bob Kingan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.
237	Alternative approaches	Dams for collection and treatment	Not Applicable	Utilising small dams to stop discharge to waterways, to allow settling and sunlight to improve quality and return collected water to be irrigated to farmland.	<ul style="list-style-type: none"> • No reason given.

191 Grant Ludemann

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	10 kg N/ha on sensitive [zone] be changed to 25 kg, and (b) 30 kg be changed to 40 kg.	<ul style="list-style-type: none"> • Not enough scientific evidence to justify original limits.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Kakanui River should be classified as a short accrual river. Instead of triple N going from 0.444 to 0.075 a difference of 6 times and 4.33 times for DRP. Wildlife should be taken into account when determining appropriate levels for E coli.	<ul style="list-style-type: none"> • This was proposed in consultation. • A graduated scale is more appropriate. • Wildlife plays a large part in E coli levels.
237	Alternative approaches	Dams for collection and treatment	Not Applicable	Capture dams should be a permitted activity in	<ul style="list-style-type: none"> • Will help cope with nutrient levels, and will allow nutrients

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				gullies.	to be reapplied through irrigation.

192 Peter McNab

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Support	Totally support.	• No reason given.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	Support	Points (iii) and (iv) - totally support. Points (i) and (ii) - support in principle.	• Beware of the role of significant weather in causing effects.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Support	Support if land occupier makes no attempt to protect, but would not like to see pinged if made valid attempt to protect waterway.	• Extreme weather can affect runoff for up to 2 days, even from fenced off native bush.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Support	Support.	• No reason given.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Support	Support, but measurement in (ii) (a) and (b) are based on what?	• Effects from rain can discolour waterway for up to 2 days.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Totally support.	• This is common sense.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Totally support.	• This is common sense.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	No decision requested.	• Critical to extensive grazing in Otago. • In many situations not viable to reticulate stock water or fence springs and gullies.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Did not specify	No decision requested.	• Does this mean animals can't be gathered and crossed over creeks? • Is this only for lakes and 'significant' rivers?
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support concept of protecting of enhancing our region's water quality and totally support the ORC stance of effects based policy rather than the act based policy.	• Issue is the costs and logistics of making changes to meet the standards, while ensuring animal welfare. • Much of the best shelter in gullies. • Long lead in period is required to meet targets sustainably - need support from ORC (not brutal enforcement).

193 Rex & Penny Lowery

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Want the policy to be practical and achievable so it's still warrantable to continue farming.	• 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Want the policy to be practical and achievable so it's still warrantable to continue farming.	• Unwarrantable to a sheep farmer, influenced by the dairy market. • A farmer does not have the time or knowledge to do the required testing.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Want the policy to be practical and achievable so it's still warrantable to continue farming.	• Unwarrantable to a sheep farmer, influenced by the dairy market. • A farmer does not have the time or knowledge to do the required testing.
202	General opposition	Whole plan change (general opposition)	Amend	Want it amended.	• Injudicious to sheep farmers. • Excessive, impractical unworkable, would make it unwarrantable to continue farming.

194 Jeremy Wales

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Oppose	This rule is unnecessary.	<ul style="list-style-type: none"> Intrusion on to private property rights.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	Drop rule.	<ul style="list-style-type: none"> Added mostly unwarranted expense.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Drop rule.	<ul style="list-style-type: none"> Farmers will only use necessary materials, not waste money.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	A mad rule - drop it.	<ul style="list-style-type: none"> Financial implications. Stock need water, land should be accessed at lowest possible cost. Definitions vague. Compliance decisions will be arbitrary, regardless of effect.

195 Dairy Holdings Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Amend	<p>There is a need to:</p> <ul style="list-style-type: none"> 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.</p>	<ul style="list-style-type: none"> Perfunctory, repeats RMA S 30(1)(c)(ii), and the RPS, doesn't give effect to them. Little guidance given to meaning of "where necessary". Objective not clear, provides little useful direction to implement the plan change.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
18	Managing effects of land use on water quality	Section 7.B - Policies general	Amend	<p>Specific policies are needed to provide the necessary framework for appropriate permitted and prohibited activities.</p>	<ul style="list-style-type: none"> Existing framework woefully inadequate. Policies not clear, provide little useful direction to implement plan change.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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 doing so it is necessary to avoid the use of terminology as "noticeable effects", "minor effects", and</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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>"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>	
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Amend	<p>In part supports policy - although to the extent of the concerns outlined [below] the policy is opposed.</p> <p>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.</p> <p>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.</p>	<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.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	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:</p> <ul style="list-style-type: none"> - 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>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.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Amend	<p>Supports the permitted activity status of the discharge of fertiliser to production land.</p> <p>Opposed to the reference to 12.C.1.3 and considers it should be deleted.</p> <p>Rule 12.B.1.5(c) needs to be amended to accommodate effects that are appropriately</p>	<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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>"avoided, remedied or mitigated" with no more than minor effects. Provision should also be made for positive effects.</p> <p>Consideration should be given to including and defining what "best practice" is rather than complying per se with the manufacturer's instructions.</p> <p>In the alternative the whole rule should be deleted.</p>	
68	Human sewage etc	Rule 12.B.4.2 - New discretionary other discharge	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.
91	Discharge rules	Section 12.C - Other discharges	Amend	No decision requested.	<ul style="list-style-type: none"> • Rule package is uncertain - gives ORC inappropriate level of discretion over compliance.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	<p>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.</p> <p>Seeks an appropriate definition of rainfall.</p>	<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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Although a permitted activity approach is supported, the rule is opposed.</p> <p>The rule package needs to be amended to accommodate the concerns outlined [in reasons] - including the possible use of a concentration limit.</p> <p>Within the Waitaki area, complying with a total maximum nitrate concentration in groundwater.</p>	<ul style="list-style-type: none"> • Border-dykers unable to meet 30 kgN/ha/yr limit, even with best practice and full mitigation. • Conversion to spray uneconomic, unclear if groundwater nitrate levels would improve. • Unclear in lower Waitaki what environmental issue being addressed. • In lower Waitaki complying with a total maximum nitrate groundwater concentration more appropriate, less adverse economic effects. • Activity status when discharge limit not met unclear. • Unclear how to show compliance with limits, what monitoring requirements needed, inadequate assessment of monitoring practicality and cost. • OVERSEER has limitations for irrigated agriculture, reliant on agreed protocols for data entry which should be incorporated into the plan change. • No provision for updates of OVERSEER, or use of other suitable models. • Unclear role of individuals for data and costs, and ORC data analysis process. • Inappropriate discretion given to ORC on compliance. • Unclear where limits are to be calculated, total or part of property, zone average. • Section 32 report and technical analysis do not justify need for, or implications of, rule. • Inappropriate to rely on Canterbury report for plan change, values not suitable at farm scale.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	The standards/targets set out in the Schedule (along with the wider plan change) need to be withdrawn until these matters [below in the reasons] can be worked through in a collaborative manner.	<ul style="list-style-type: none"> • Overly simplistic, unlikely to be useful. • 'Good water quality' is not well defined, some requirements cannot be achieved (e.g. 'colour-free'). • Little technical support. • Discharge limits (as opposed to catchment load limits)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					not practicable for diffuse pollution. • Will be difficult, onerous and costly for individual farmers to measure discharge.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	The standards/targets set out in the Schedule (along with the wider plan change) need to be withdrawn until these matters [below in the reasons] can be worked through in a collaborative manner.	<ul style="list-style-type: none"> • Discharge limits not practicable for diffuse pollution, should set catchment/water body total concentration limits. • Source of, or need for, limits unclear. • Unclear how diffuse discharges can be measured. • Overly onerous, not realistically achievable. • Section 32 report and technical analysis do not justify the need for, or implications of, rule. • Discharge limits (as opposed to catchment load limits) are not practicable for diffuse pollution. • Will be difficult, onerous and costly for individual farmers to measure discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Plan change 6A should be withdrawn (or rejected). Or alternative is that Within the Waitaki area, complying with a total maximum nitrate concentration in groundwater would be far more appropriate and have less adverse economic effects than what has been proposed.	<ul style="list-style-type: none"> • Support intent of effects-based regime, but plan change unduly onerous, unwarranted and unnecessary. • Insufficient clarity, inappropriate level of Council discretion. • 'No mixing' approach is contrary to Section 107 RMA, fails to give effect to RPS policy 6.5.5(c). • Impractical, difficult, onerous, costly measurement/monitoring. • Default prohibited status contrary to good RMA practice. • Inadequate section 32 analysis. • Insufficient technical analyses, nor proof Schedule 15 standards will be achieved by target dates. • Reliance on use of Overseer. • Effect on border-dyking in the Waitaki. • Would undermine water allocations (through the Waitaki Catchment Water Allocation Regional Plan), pushing water currently used in Otago, into Canterbury.
227	Prohibitions	Prohibitions - general requests	Amend	Opposed to the prohibited activity rule suite. Seeks the other matters raised [below in the reasons] to be addressed in any discretionary activity rule - after the current proposed rules have been withdrawn and an appropriately detailed analysis undertaken to identify a more appropriate set of rules that are technically justified and drafted to provide all parties with certainty about exactly what activities would be prohibited.	<ul style="list-style-type: none"> • Default prohibited status inappropriate, contrary to good RMA practice. • Section 32 report and technical analysis do not justify need for, or implications of, prohibitions. • No environmental need for such a strict regime. • A number of acceptable activities (under Part II of the RMA) will now be prohibited, including those with no more than minor effects, e.g. a small increase in colour. • Compliance implications and obligations same for prohibited activities as for discretionary or non-complying. • Rule package lacks sufficient detail and is inappropriate - given the ambiguity, implied subjective considerations, vast coverage and uncertainties. • Term "any discharge of contaminants" all-inclusive, could automatically prohibit activities not covered in other rules. • Key phrases such as "ponding" not defined, ponding could be appropriate in some cases.

196 Clyde Dairy Farm Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	[It is] unreasonable for the Council to impose zero tolerance in extreme instances [extreme rain	• Potential nutrient run off during an extreme rain event could be good for oceans.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				events].	• Landowners should apply some mitigation to heavily reduce or stop silt loss.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Some of your targets for water quality are unreasonably high.	• Water quality and farming practices have improved immensely in lower Clutha. • Maintaining high environmental standards is paramount, but should not be exclusively to farmers' financial detriment.
202	General opposition	Whole plan change (general opposition)	Oppose	It is unjust that Council are adamant in imposing unreasonable laws upon their rate payers.	• Plan change has unjust economic and social impact on farmers, and negative flow on effect for whole economy. • Needs better explanation. • Some regulations unworkable.
244	Alternative approaches	Other approaches	Not Applicable	The Council should continue to help educate and promote good farming practices. 'Not' to try regulate farmers and others out of business.	• 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, but Council zero tolerance is unreasonable.

197 Te Runanga o Ngai Tahu, Moeraki & Otakou, Kati Huirapa Runaka Puketeraki, Hokonui Runanga

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Support	That Objective 7.A.1 be retained as currently drafted.	• Supports objective.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	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."	• No clear link between objective and table 15.1. • Should actively promote enhancement of degraded freshwater bodies.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	That Objective 7.A.3 be retained as currently drafted.	• Support objective.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	That Policy 7.B.1(a) be redrafted as follows: Advice Note or Explanation: Noticeable effects means . . . ALTERNATIVELY (a) Avoiding discharges of contaminants with noticeable effects on the characteristics of good water quality that support natural and human use values. That Policy 7.B.1(b) be redrafted as follows: (b) Allowing discharges of contaminants that cumulatively have no more than minor effects; and That Policy 7.B.1(c) be retained as currently drafted.	• 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	That Policy 7.B.2 be retained as currently drafted.	• Supports policy.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Support	That Policy 7.B.2 be retained as currently drafted.	• Supports policy.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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."	• To strengthen policy. • Appropriate to provide guidance on "adaptive management".

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				"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."	
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	Oppose	That Policy 7.D.1 as currently drafted is deleted and a new policy inserted: "New Policy: 7.D.1 Apply limits on contaminants discharged into freshwater or onto land where it may enter freshwater 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 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."	<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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Amend	Redraft as follows: Any discharge of contaminants to freshwater, or onto land where it may enter freshwater, where the discharge: (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).

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	Support	Retain rule as currently drafted.	• Supports rule.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	Support	Retain rule as currently drafted.	• Supports rule.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Support	Retain rule as currently drafted.	• Supports rule.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Support	Retain rule as currently drafted.	• Supports rule.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Rule 12.C.1.2 be deleted OR 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"> • 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"? • 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Rule 12.C.1.3 be deleted OR Rule 12.C.1.3 should be redrafted to link what is occurring on-site to the outcomes sought within groundwater. The redrafted rule should be clear, enforceable and enable people to determine whether they comply with the rule. AND That a maximum lead in time of 5 years should be provided.	<ul style="list-style-type: none"> • OVERSEER version 6.0 not yet publicly available, cannot determine appropriateness of using this model. • (i) lacks clarity, does it apply to calculated nitrogen leaching by landowners or ORC? • 7 years lead in excessive - 5 years used in other regions. • "Necessary" data not specified.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	Rule 12.C.1.4 be redrafted as follows: The discharge of contaminants from any animal waste system, silage storage or composting process to land is a permitted activity, providing...	• Supports rule, drafting inconsistent with Rule 12.C.0.5.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Support	Retain rule as currently drafted.	• Supports rule.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water	Support	Retain rule as currently drafted.	• Supports rule.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		supply systems permitted			
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	For the matters over which council will restrict its discretion for Rule 12.C.2.1 be amended to include a additional matter, respectively: (l) Any effect on Tangata Whenua values. AND The note to the rule to be amended as follows: The Consent Authority may preclude public notification . . .	<ul style="list-style-type: none"> • Supports rule, but extra matter needed to give effect to Objective D1 and Policy D1 of NPSFW. • Could be circumstances when notification is appropriate due to scale and/or significance of activity.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Amend	That Rule 12.C.2.2 be retained as currently drafted. AND The note to the rule to be amended as follows: The Consent Authority may preclude public notification...	<ul style="list-style-type: none"> • Supports rule, but unclear how Council intends to satisfy itself concerns of lwi are addressed. • Could be circumstances when notification appropriate due to scale and/or significance of activity.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	That Rule 12.3.1.1 be retained as currently drafted.	<ul style="list-style-type: none"> • Supports rule.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	That Rule 13.2.1.7 be amended to require that there is no change to the water level or hydrological function, or no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland. AND The rules should specify a minimum distance between structures.	<ul style="list-style-type: none"> • Wetlands amendment will strengthen rule. • Minimum distance will avoid incremental enclosure of rivers and tributaries.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Amend	That Rule 13.2.1.7A be amended to require that there is no change to the water level or hydrological function, or no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland. AND The rules should specify a minimum distance between structures.	<ul style="list-style-type: none"> • Wetlands amendment will strengthen rule. • Minimum distance will avoid incremental enclosure of rivers and tributaries.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	That Rule 13.2.1.7B be amended to require that there is no change to the water level or hydrological function, or no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland. AND The rules should specify a minimum distance between structures.	<ul style="list-style-type: none"> • Wetlands amendment will strengthen rule. • Minimum distance will avoid incremental enclosure of rivers and tributaries.
111	Bed disturbance - structures and animal waste	Rule 13.3.2.1 - Alteration of a structure restricted discretionary	Support	That Rule 13.3.2 be retained as currently drafted.	<ul style="list-style-type: none"> • Supports rule.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance	Amend	That Rule 13.5.1.1 be redrafted to remove the use	<ul style="list-style-type: none"> • Supports rule, including reduction in the area of effect to

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		structures permitted		of mixing zones. OR That Rule 13.5.1.1 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	100 metres, but may be inconsistent with Policy 7.D.1 on removal of mixing zones.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	That Rule 13.5.1.2 be redrafted to remove the use of mixing zones. OR That Rule 13.5.1.2 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	• Supports rule, including reduction in the area of effect to 100 metres, but rule may be inconsistent with Policy 7.D.1 on removal of mixing zones.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	That Rule 13.5.1.3 be redrafted to remove the use of mixing zones. OR That Rule 13.5.1.3 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	• Supports rule, including reduction in the area of effect to 100 metres, but rule may be inconsistent with Policy 7.D.1 on removal of mixing zones.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	That Rule 13.5.1.4 be redrafted to remove the use of mixing zones. OR That Rule 13.5.1.4 be retained as currently drafted to confine the area of effect to 100 metres downstream of the disturbance.	• Supports rule, including reduction in the area of effect to 100 metres, but rule may be inconsistent with Policy 7.D.1 on removal of mixing zones.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Support	Retain rule 13.5.1.8A as currently drafted.	• Supports intent of rule.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Support	Retain rule 13.5.1.8B as currently drafted.	• Supports intent of rule.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Support	13.5.A.0.1 be retained as currently drafted.	• Supports rule.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Support	Table 15.1 be retained as currently drafted.	• Supports table.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	That Table 15.2 be retained, but that the values set out should be maximum values rather than averages. AND That Table 15.2 sets out where, physically, these values are to be monitored.	• Values in Table 15.2 won't achieve outcomes in Table 15.1. • Implementation concerns, monitoring at current ORC sites, or where waterway leaves property, or everywhere discharges may enter water (numerous and impossible to achieve)?
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	That Schedule 16 be retained, but that the values set out should be maximum values rather than averages.	• Values in Schedule 16 won't achieve outcomes in Table 15.1. • Implementation concerns, monitoring at current ORC sites, or where waterway leaves property, or everywhere

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				AND That Schedule 16 sets out where, physically, these values are to be monitored.	discharges may enter water (numerous and impossible to achieve)?
131	Other matters	Minor and consequential changes	Amend	Make any similar amendments with like effect to the relief sought [in this submission]. Make any consequential amendments necessary to give effect to the relief sought [in this submission].	• To give effect to relief sought.
208	Policy framework	Chapter 7 - general requests	Amend	Replace all references to 'water body' in the Plan Change 6A with 'freshwater body'. Provide explicit reference in the plan change to tangata whenua cultural values and interests, including kaitiakitanga.	<ul style="list-style-type: none"> • RMA definition of 'water body' excludes artificial water bodies, land drainage networks. • 'Freshwater' broader term. • NPSFW gives directions to ORC with regard to Nga Runanga involvement in decision making. • Plan change makes no explicit reference to tangata whenua values and interests.
209	Discharge rules	Chapter 12 - general requests	Amend	Replace all references to 'water body' in the Plan Change 6A with 'freshwater body'. Provide explicit reference in the plan change to tangata whenua cultural values and interests, including kaitiakitanga.	<ul style="list-style-type: none"> • RMA definition of 'water body' excludes artificial water bodies, land drainage networks. • 'Freshwater' broader term. • NPSFW gives directions to ORC with regard to Nga Runanga involvement in decision making. • Plan change makes no explicit reference to tangata whenua values and interests.

198 John Barlow

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Strongly support the overarching idea of an effects based plan as it is proposed.	<ul style="list-style-type: none"> • If it works could become template for how water and land interrelationship is managed NZ wide. • The plan does not cover activities that are totally unsuited to the land type.
211	Implementation	Compliance, enforcement, education	Not Applicable	Add another section to the plan, say section 17, which would detail how non compliance is to be handled.	<ul style="list-style-type: none"> • Plan needs to spell out what happens when an activity which has been allowed but cannot comply, continues to non comply with no possibility of complying. • Plan change silent on these matters. • Proposed approach will only work with sufficient resources allocated to monitoring individual catchments, and dealing with subsequent non-compliance.

199 Ian Bryant

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
202	General opposition	Whole plan change (general	Amend	Plan 6A should be delayed.	• Support the effects-based approach, but new technology

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		opposition)			and tools referred to in ORC Rural Water Strategy not yet available. <ul style="list-style-type: none"> • Discharge limits unachievable. • Sediment rule open to interpretation. • Queries if heavy metals from highways addressed. • 12 hrs after rain too lenient for steep areas, harder on flat areas.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Oppose	Oppose.	<ul style="list-style-type: none"> • Limits subjectively set, too low to be achievable, low compared to urban discharge standards.
236	Implementation	Transition times	Oppose	Plan 6A should be delayed till these measuring tools [as quoted in ORC Rural Water Quality Strategy] are readily available.	<ul style="list-style-type: none"> • Tools to allow farmers to take "frequent, inexpensive, and practical measurement of contaminant levels in discharges" unavailable. • These tools are essential in managing any discharge.

200 Hopefield Investments Ltd (R Griffiths)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or	Oppose	Adequate time for rational debate on the regional and national implications of Plan Change 6A.	<ul style="list-style-type: none"> • Costs associated with compliance. • Proposed time frames insufficient.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		river, or a Regionally Significant Wetland		Extension of the proposed time frame to permit of 1 above.	<ul style="list-style-type: none"> Unknown implementation management of changes by ORC.

201 Dougal Rillstone

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Support the intent and philosophy underpinning the draft plan change. Would strongly resist any dilution of the thrust of the plan change, or any weakening of the protective measures proposed.	<ul style="list-style-type: none"> Likes the manner in which the Council is addressing water quality. Enjoy use of water as angler. Wider amenity values.

202 Irrigation New Zealand Incorporated

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
18	Managing effects of land use on water quality	Section 7.B - Policies general	Amend	Rewrite.	<ul style="list-style-type: none"> Terms unclear. Needs clarity to provide guidance and certainty.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	Rewrite.	<ul style="list-style-type: none"> "Limited time period", "minimise the discharge" meanings unclear. Timeframes need to reflect investment, development.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Delete. A process needs to be established whereby ORC facilitates groupings of community stakeholders to set freshwater objectives (using social, economic, environmental and cultural value judgements) and then interpret these to provide corresponding limits.	<ul style="list-style-type: none"> Catchment specific limits relevant, better community buy in for achieving. Concerns with achievability and implications of crude "region wide" limits. Some catchments have no current environmental issues. Recommend Overseer version not stated. Overseer 6 has limitations for irrigated agriculture. Urgent need to develop Overseer for irrigated environments, encourage ORC to join this process.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	It is important ORC continues to partner with industry and consent holders in the development of Codes of Practice, Standards and Environmental Management Systems and reinforce their uptake through the policy framework.	<ul style="list-style-type: none"> Concerned with deletion. Effective tools.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Agrees that it is not practicable to set limits for each individual catchment [as per NPSFW], however there is a need for greater engagement with communities at the sub-region level than has occurred in this instance. If limits are set at the farm level they must relate to the desired state of the freshwater body in question, taking into account the assimilative capacity of the environment and its attenuation factors.	<ul style="list-style-type: none"> First set freshwater objectives then set limits accordingly. Objectives and limits include environmental, social, cultural, and economic values. Need robust decision making. Unclear how attenuation is factored into limits. Mitigations for increasing assimilative capacity must be enabled.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Withdraw. Table 15.1 need be rewritten so as it clearly separates the narrative and numerical objectives. This should be done in collaboration	<ul style="list-style-type: none"> No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				with stakeholders throughout Otago and also with better understanding of the benefits to and consequences upon individual communities for each.	
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Withdraw. Table 15.2 need be reviewed in collaboration with stakeholders.	<ul style="list-style-type: none"> • Unable to locate technical reports that support standards and transition times.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Withdraw. Schedule 16 need be reviewed in collaboration with stakeholders. Agrees that it is not practicable to set limits for each individual catchment [as per NPSFW], however there is a need for greater engagement with communities at the sub-region level than has occurred in this instance.	<ul style="list-style-type: none"> • Unable to locate technical reports that support discharge limits and transition times. • First set freshwater objectives then set limits accordingly. • Objectives and limits include environmental, social, cultural, and economic values. • Need robust decision making.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Supports the 'effects-based' approach ORC has taken to managing within water quality limits. The plan needs to be revisited, more clearly articulating what its objectives and policies are and what the expectations of the rules are. Section 32 report - Review. Overall the analysis is high level and simplistic and needs to be revisited in greater depth -exploring a broader range of options.	<ul style="list-style-type: none"> • Provides flexibility. • Allows catchment specific approach. • Wording in plan change subjective, open to wide interpretation. • Consistency, better understanding of implications, as well as monitoring and enforcement. • Do not agree with evaluation of strategic approaches, or with setting contaminant limits vs catchment based load limits. • Plan change doesn't allow communities to explore other approaches, such as cap and transfer mechanisms.
227	Prohibitions	Prohibitions - general requests	Oppose	Rules 12.C.0.1 - 5 - Withdraw	<ul style="list-style-type: none"> • Subjectivity in prohibited activities. • Land users need certainty. • Open to interpretation. • Restricted discretionary or non-complying better. • ORC needs to recognise complexities of water quality.
236	Implementation	Transition times	Amend	An economic analysis is required to robustly define transition times.	<ul style="list-style-type: none"> • Current transition times are arbitrary. • Transition times must reflect investment required. • Blanket 'one size fits all' not sound approach.

203 NZ Transport Agency

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Simplifying and streamlining	Section 7.2 - Issues in general	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Amend Objective 7.A.2 to make it about enhancing water quality.	<ul style="list-style-type: none"> • Partially overlaps 7.A.1, unnecessary as both requiring the same outcome.
18	Managing effects of land use on water quality	Section 7.B - Policies general	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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"> • 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.

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35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	<p>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).</p> <p>Amend Policy 7.D.2 to indicate what "a limited time period" is considered to be.</p>	<ul style="list-style-type: none"> • 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Amend	Amend rules in Section 12.C of the Plan to give effect to Policy 7.D.3.	<ul style="list-style-type: none"> • No rule giving effect to 7.D.3. • No rule providing for consents to discharge to land under Policy 7.D.3. • Activities become discretionary under RMA, but needs clarifying.
52	Discharge rule framework	Sections 12.A – 12.C - Introduction to discharges of contaminants or water	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.
62	Beyond the scope	Rule 12.B.1.8 / 12.4.1.1 - Stormwater reticulated discharge permitted	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.
63	Beyond the scope	Rule 12.B.1.9 / 12.4.1.2 - Stormwater road discharge permitted	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.
65	Beyond the scope	Rule 12.B.3.1 / 12.4.2.1 - Stormwater discharge restricted discretionary	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.
67	Human sewage etc	Rule 12.B.4.1 - New discretionary trade discharge	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.
68	Human sewage etc	Rule 12.B.4.2 - New discretionary other discharge	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.
91	Discharge rules	Section 12.C - Other discharges	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					opposed. • Schedule 16 limits are not to be exceeded. Limits should be median values.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.	• 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.	• 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.	• 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.	• Measurement method not defined in the Glossary. • A mixing zone with a visual assessment method should be provided.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Revise rule to make location of compliance clear and practicable.	• 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.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Remove clause (ii) of Rule 12.C.1.5.	• S15 of RMA distinguishes between water and contaminants. • If rule is about discharge of water, clause (ii) confuses and inconsistent with Rule 12.C.1.2.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Approve the rule as amended.	• Effects on water bodies will be avoided, remedied or mitigated.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Add the words ", including culverts, fords and pipe crossings," after the first incidence of the word "crossing" in Rule 13.2.1.7B. Delete (c).	• "Crossing" needs to be defined. It should include culverts and other piped crossings. • Restricting length to 10 m is not justifiable in terms of effects.
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Amend	Amend proposed Rules 13.5.1.1(e), 13.5.1.2(c), 13.5.1.3(c) and 13.5.1.4(c) by adding the words "in any 24 hour period" after the word "duration". The Rules will read: "The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period; and" Amend proposed Rules 13.5.1.1(f), 13.5.1.2(d), 13.5.1.3(d) and 13.5.1.4(d) to state "All reasonable	• Referring to wetted bed is effects-based. • Work will generally occur in daylight hours. 14 hours provides recovery time for affected water body length. • Distance downstream should be related to the size of the water body.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				steps are taken to minimise the release of sediment to the lake, river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and"	
112.2	Bed disturbance - remobilisation	Section 13.5 note box - Alteration of the bed of a lake or river, or of a Regionally Significant Wetland - note	Amend	Delete the note under the heading [13.5] and replace with a Rule worded as follows, or to like effect: "The reclamation and deposition of cleanfill associated with works in the bed of a lake or river, or wetland, are addressed through disturbance rules in Section 13.5, and not through discharge rules in Section 12.C."	<ul style="list-style-type: none"> • Guidance note should be expressed as rules to give legal weight.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Revise Schedule 15 to: a. Divide the region up on a more rational basis. b. Specify that the receiving water targets are medians. c. Clarify that the targets will be monitored by the ORC as part of the State of the Environment monitoring programme, not for example in worst case scenarios such as immediately after rainfall. d. The targets will not be applied as maximums when implementing Plan Change 6A. e. Specify more appropriate dates for those catchments that do not currently comply with the Schedule 15 targets.	<ul style="list-style-type: none"> • Current division of Otago is not appropriate. • One single standard for entire river does not recognise differences in different parts of catchment. • Contaminant limit document supporting plan change uses medians from SOE datasets. • Targets could be interpreted as maximums. • 5 years to comply not assessed in the plan change or S32 Report. Highly stringent and may not be achievable. • Recognises scums and foams occur naturally and not an effect that needs avoided, remedied or mitigated.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Clarify the intent of Table 15.1 and resolve uncertainty in the definition of some characteristics.	<ul style="list-style-type: none"> • Unclear if needs to be complied with as well as the Table 15.2 and, if so, by what date. • Exemptions/qualifications contained in colour, sediment and smell make application very uncertain.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Revise the limits in Schedule 16 so that they are appropriate and attainable.	<ul style="list-style-type: none"> • Not allowing for mixing zones is inappropriate. • Such stringent standards are inappropriate. • In supporting documentation, limits derived from medians, but these applied as maximums. • Limits based on data under general conditions, inappropriate for worst-case situations. • Concerned unachievable even with best management practices. • Basing receiving water targets as discharge limits do not reflect actual environmental impact. • Currently available information shows proposed limits not realistic. • Future extension to infrastructure discharges concerning.
208	Policy framework	Chapter 7 - general requests	Amend	Include explanations for objectives and policies.	<ul style="list-style-type: none"> • Explanations provide context and guidance and are useful for certainty and interpretation.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Amend	Add a catchall discretionary rule to allow discharges to water to obtain consent.	<ul style="list-style-type: none"> • There is no discretionary activity for discharges to water. • Compliance with Schedule 16 unachievable. • Concerned about possible future extension of this approach to stormwater discharges.

204 NZ Agricultural Aviation Association

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.

205 Deanne & Steve Amende

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Do not agree on all of Proposed plan Change 6a (Water Quality) that affect Significant Wetlands until a sensible decision is made on the boundaries of our Akatore property.	<ul style="list-style-type: none"> Submission and hearings on Plan Change 2 seem invalid. Agree on boundaries before another policy comes out, so know effects on our property.

206 Trustpower Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1.1	Simplifying and streamlining	Section 7.1 - Introduction	Amend	Amend the Introduction to provide certainty as to which parts of the current Plan Change and any future plan changes would relate to renewable electricity generation activities.	<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 12.C. Make clear that discharges from renewable electricity generation are captured under 12.C, as advised by ORC staff.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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".
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Oppose	Remove this objective from 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".
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	Adopt the proposed objective.	<ul style="list-style-type: none"> ORC's involvement of community in managing water quality issues is supported.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Remove this Policy, or amend it to address the concerns identified by TrustPower.	<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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
21	Managing effects of land use on	Policy 7.B.3 / 7.7.2 - Considerations	Support	Adopt the policy as proposed.	<ul style="list-style-type: none"> The matters are relevant and important.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality	for discharge to land			
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Adopt the proposed policy.	<ul style="list-style-type: none"> • Adaptive management and innovation supported.
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
52	Discharge rule framework	Sections 12.A – 12.C - Introduction to discharges of contaminants or water	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.
91	Discharge rules	Section 12.C - Other discharges	Amend	Identified four main areas which require clarification/amendments in relation to the rules. Seek: - 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.
92	Discharge rule framework	12C Note box - How the rules apply	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	Amend	As a priority, remove Rule 12.C.0.2 from the plan change and revise all other prohibited activity statuses. Amend Rule 12.C.0.2 by lowering the activity status	<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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and amending its content so that it is measurable and allows for a mixing zone and revise all other prohibited activity statuses.	<ul style="list-style-type: none"> • Dam discharges of discoloured water may be classed as prohibited. • Discolouration is allowed from bed disturbance activities. More appropriate than prohibition.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Amend the proposed rule as follows: "Excluding discharges captured by Rule 12.C.1.6, the discharge of water to water, or water to a Regionally Significant Wetland, that ..."	<ul style="list-style-type: none"> • Clarity on how rules work together • Rule should not apply in addition to meeting Rule 12.1.2.6 for dam discharges.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	<p>Retain existing Rule 12.12.1.1 and the associated principal reasons for adopting, and amend Proposed Rule 12.C.1.6 as follows:</p> <p>"12.C.1.6 The discharge of water or contaminants listed in Schedule 16 from:</p> <p>(i) a dam or diversion; or</p> <p>(ii) water supply transport system, to water, or to a Regionally Significant Wetland, is a permitted activity, providing:</p> <p>(a) There is no discharge of water from one catchment to another; and</p> <p>(b) The dam is not used for the storage of contaminants; and</p> <p>(c) The presence of contaminants does not result from the damming activity or the activities of the dam operator; and</p> <p>(d) The presence of contaminants does not result from the water transporting activity, or the activities of the water transporter; and</p> <p>(e) The water supply transport system does not convey irrigation runoff; and</p> <p>That existing Rule 12.12.1.2 should be retained, and if Rule 12.12.1.1 is to be replaced by Rule 12.C.1.6 it should apply to all discharges from dams and diversions, rather than only to those from dams that are permitted.</p> <p>That regard should be had to the existing explanatory text in Section 12.12 of the Plan.</p>	<ul style="list-style-type: none"> • Rule only applies to permitted activities. Should apply to dams. • Trustpowers' operations do not typically alter the quality of the water received. • Existing conditions in Rules 12.12.1.1, 12.12.1.2 should be provided for. • Discharges from a diversion to be provided for, as similar to those from dams. • It is cumbersome to submit on the inclusion of Condition (f) outside of the context of Plan Change 2. • Condition (f) doesn't meet requirements of permitted activity standard. • Explanatory text of existing rules 12.12 recognises characteristics of, and discharges from, dams and hydro-electric facilities. • Agrees with these explanations and opposes their deletion. • Existing structure gives effect to NPS for Renewable Energy Generation.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend the proposed rule as follows: "For any activity that is not classified as a permitted activity under section 12.C.1, the discharge of contaminants listed in Schedule 16 to land."	<ul style="list-style-type: none"> • Unclear how rules work together • Rule should apply only after permitted rules exhausted.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Amend	Amend the proposed rule as follows: "Regardless of the permitted activity rules for other discharges in section 12.C.1, the discharge of water from one	<ul style="list-style-type: none"> • Unclear how rules work together. • Rule should apply to catchment to catchment discharge regardless of permitted activity rules.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				catchment to another is a restricted discretionary activity."	
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> Restricted discretionary activity status for discharges between catchments is supported.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> Support ensuring bed disturbance by stock has no significant adverse effect. Support making bed crossings more permissive.
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Amend	Regarding Rules 13.5.1.1 to 13.5.1.4: <ul style="list-style-type: none"> -Adopt the amendments to the conditions proposed relating to the wetland bed or a lake or river. -Remove the amendments relating to mixing distances from the plan change and retain the existing 250 m mixing distance. 	<ul style="list-style-type: none"> Support amendment relating to work in the wetted bed. It should not matter if work is not consecutive. 100 m mixing distance impractical and no justification has been given. Inconsistent with 12.C prohibited sediment discharges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> Support ensuring bed disturbance by stock has no significant adverse effect. Support making bed crossings more permissive.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> Support ensuring bed disturbance by stock has no significant adverse effect. Support making bed crossings more permissive.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Support	Adopt the proposed rule.	<ul style="list-style-type: none"> Support ensuring bed disturbance by stock has no significant adverse effect. Support making bed crossings more permissive.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Seeks that Table 15.1 is deleted/removed from the Plan Change.	<ul style="list-style-type: none"> 'Good quality water' characteristics are arbitrary They do not provide for natural variability in colour, turbidity and siltiness. Odour difficult to assess, may come from surrounding land.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Remove Table 15.2 from the plan change, or amend it to identify the concerns identified by TrustPower.	<ul style="list-style-type: none"> No certainty as to how targets were established. No certainty as to how targets can be achieved. Supplementary information should be provided assessing compliance with standards, to assist in determining if achievable.
131	Other matters	Minor and consequential changes	Not Applicable	Such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	<ul style="list-style-type: none"> As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	Opposes the Plan Change and has set out the specific relief sought in Appendix C.	<ul style="list-style-type: none"> Does not promote sustainable management. Does not recognise unique nature of discharges associated with hydroelectric. Does not give effect to NPS for Renewable Energy Generation. Does not promote efficient use, development of resources. Does not have comprehensible structure. Did not take into consideration consultation. Does not represent sound resource management practice.
208	Policy framework	Chapter 7 - general requests	Did not specify	That such amendments are made to the objectives and policies as required to achieve consistency with the purpose of the RMA as defined in Section 5(2). That such amendments are made to the objectives	<ul style="list-style-type: none"> Concerned that a balance as not be achieved for social, economic, cultural wellbeing. Does not recognise discharges can have significant positive benefits outweighing adverse effects.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and policies as required to achieve consistency with the purpose of the RMA. This may require amendments to the existing objectives and policies or additional objectives and policies being proposed.	
211	Implementation	Compliance, enforcement, education	Not Applicable	No decision requested.	<ul style="list-style-type: none"> Monitoring and enforcement of proposed rules could potentially generate significant strain on ORC's resources. Onus may be on consent holders to achieve targets. Creates unfair burden not shared by all discharges.
227	Prohibitions	Prohibitions - general requests	Amend	Revise all other prohibited activity statuses.	<ul style="list-style-type: none"> Oppose the prohibited statuses proposed in the Plan Change. Without significant justification and cost/benefit analysis, remove prohibited status.

207 M C Holland Farming Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	Policy 7.D.2 amended to set realistic and measurable discharge limits and time limits to attain them.	<ul style="list-style-type: none"> 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Amend	That Condition (ba) be amended to read: '(ba) Steps are taken to prevent, as far as possible, animal waste from entering the water body from the structure.'	<ul style="list-style-type: none"> Requires any river crossing altered to ensure no animal waste reaches water from it. Agree with intent. Not practical to prevent all animal waste entering water.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	The water quality targets and timeframes contained in Schedule 15 for the Waianakarua catchment are revised to be appropriate and achievable, or the Waianakarua catchment is classified as a short accrual catchment, or more than two categories are established for catchments in Otago to avoid the issues raised with catchments such as the Waianakarua that sit right on the boundary of the current categories.	<ul style="list-style-type: none"> • Waianakarua doesn't meet NNN or DRP targets, but would if classified as "short accrual". • Waianakarua on margin between short and long accrual groups. • Waianakarua has good water quality, not been of concern to ORC. • Concerned that nutrient guidelines have been applied as targets in Schedule 15. • Queries 2017 target date as no justification provided.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	That Schedule 16 is amended to set realistic and measurable 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. • Meeting limits not practical or possible. • Limits would push us too consent. • Poses significant risk to ongoing farm viability.
131	Other matters	Minor and consequential changes	Amend	Such other relief as is appropriate to give effect to our submission.	<ul style="list-style-type: none"> • As discussed in other submission points.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	That PC6A needs substantial amendment before it is made operative.	<ul style="list-style-type: none"> • Section 32 does not adequately assess social and economic costs. • Are targets and standards achievable without substantial change in land use.
227	Prohibitions	Prohibitions - general requests	Amend	The prohibited activity rules are revised to recognise that some of the activities currently prohibited only have minor effects on water quality and hence should not be prohibited.	<ul style="list-style-type: none"> • Rules very stringent. • Rule 12.C.0.2 allows no decrease in visual clarity whatsoever. • Rule 12.C.0.3 allows no erosion, likely to be impossible to met. • Adverse effects may only be no more than minor and localised.

208 Poplar Grove Station Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Rule 13.5A.0.1 is too wide in definition and impractical to a sheep farming operation.	<ul style="list-style-type: none"> • Cost of fencing and water reticulation affects viability of farm.
220	Other matters	Process	Not Applicable	Needs greater consultation with more practical examples.	<ul style="list-style-type: none"> • Compliance costs would dramatically affect farming outputs. • Difficult to understand practical application of changes.

209 Blakely Pacific Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
18	Managing effects of land use on water quality	Section 7.B - Policies general	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Support	Retain current wording.	<ul style="list-style-type: none"> • Reflects the inherent variability in sediment yield from forestry.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide	Not Applicable	Replace the 20 m 'discharge prevention setback' to	<ul style="list-style-type: none"> • Application should be consistent with industry best

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		(aerial) discharge permitted		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).	practice standards.
91	Discharge rules	Section 12.C - Other discharges	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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. Should specify a visual clarity limit.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Retain current wording.	<ul style="list-style-type: none"> Support permitted activity.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Delete Rule 13.2.1.7(f) from the plan change, or align the proposed rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> Manual gives specific guidance on bridge installation.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend rule to address the concern expressed in Reasons, reword the rule to say: the erection or placement of any crossing in or on the bed of a lake or river, is a permitted activity, provided that the maximum fill height is no greater than 1.5 m above the lowest part of the bed where it is located.	<ul style="list-style-type: none"> Rule too stringent for plantation forestry operations. Culverts require a minimum overburden depth, e.g. 1 m diameter culvert requires minimum of 500 mm overburden.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Amend	Delete the word 'maintenance' from Rule 13.3.	<ul style="list-style-type: none"> Reference to 'maintenance' inconsistent with Rule 13.1.1.1(c). Maintenance should be permitted.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> Neither achievable nor realistic in practice.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> Neither achievable nor realistic in practice.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> Neither achievable nor realistic in practice.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amendment to Schedule 15 as may be required to	<ul style="list-style-type: none"> Recognise importance of Schedule 15

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				support relief requested in submission on policies and rules in Chapter 12.	<ul style="list-style-type: none"> • Oppose stringent turbidity units and impact these will have on forest owners.
131	Other matters	Minor and consequential changes	Amend	Such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	<ul style="list-style-type: none"> • As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	Make the changes outlined in the submission.	<ul style="list-style-type: none"> • Doesn't practically allow for primary production operations, such as forestry: • Not meeting permitted rules becomes prohibited even if all practicable measures have been taken to mitigate, remedy, or avoid effects. • Plan change will require forestry industry to comply with unrealistic and unachievable standards.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> • Support efforts to address contaminants in runoff, drainage and leaching. • Support approach to effects-based management instead of controlling land use activities.
227	Prohibitions	Prohibitions - general requests	Oppose	Remove prohibited activity status from the rules in PPC6A and replace it with controlled activity status.	<ul style="list-style-type: none"> • RMA enables people to undertake sustainable activities. • Prohibitions should be introduced only if there is clear evidence of adverse effects that can't be appropriately managed. • Failure to comply with permitted activities will result in forestry being a prohibited activity.
240	Water discharges	Water discharges - general requests	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> • 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.

210 Lakes Landcare

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Modify/change.	<ul style="list-style-type: none"> • Impractical not having any lead-in time for management change.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Modify/change.	<ul style="list-style-type: none"> • 10 kgN/ha is too stringent; 30 more flexible without adverse effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Modify/change.	<ul style="list-style-type: none"> • Standards imposed are too stringent • Based on data from major river not all tributaries.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Leave.	<ul style="list-style-type: none"> • Sensible permitted activity allowing culverts and bridges.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Modify/change.	<ul style="list-style-type: none"> • Impractical. Will stop stock moving through creeks or around lake margins.

211 Dunedin City Council (Water and Waste Services)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					other factors that need to be balanced against natural and human use values.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Objective 7.A.2 be amended to focus it on enhancing water quality.	<ul style="list-style-type: none"> Partially overlaps with Objective 7.A.1 as both require maintenance of good water quality.
18	Managing effects of land use on water quality	Section 7.B - Policies general	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	<p>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).</p> <p>Amend to indicate what "a limited time period" is considered to be.</p>	<ul style="list-style-type: none"> 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.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	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.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	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.
62	Beyond the scope	Rule 12.B.1.8 / 12.4.1.1 - Stormwater reticulated discharge permitted	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.
63	Beyond the scope	Rule 12.B.1.9 / 12.4.1.2 - Stormwater road discharge permitted	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.
65	Beyond the scope	Rule 12.B.3.1 / 12.4.2.1 - Stormwater discharge restricted discretionary	Not Applicable	Retain.	<ul style="list-style-type: none"> Provides certainty to plan users.
67	Human sewage etc	Rule 12.B.4.1 - New discretionary trade discharge	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.
68	Human sewage etc	Rule 12.B.4.2 - New discretionary other discharge	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
91	Discharge rules	Section 12.C - Other discharges	Amend	That rules in Amended Chapter 12.C of Plan Change 6A are amended to give effect to Policy 7.D.3. That a 'catch-all' discretionary rule is added to section 12.C to allow discharges to water to obtain consent.	rules. <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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Rule irrelevant as discharge prohibited under 12.C.0.2.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	In combination with amendments to Schedule 16, that Rule 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"> • Opposed as references Schedule 16. • 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.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	That clause (ii) of Rule 12.C.1.5 is deleted.	<ul style="list-style-type: none"> • Causes confusion. • Not consistent with approach in Rule 12.C.1.2.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	That Rule 13.2.1.7 be approved as amended.	<ul style="list-style-type: none"> • Conditions ensure that adverse effects are avoided, remedied or mitigated.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Add the words ", including culverts, fords and pipe crossings," after the first incidence of the word "crossing". Delete (c).	<ul style="list-style-type: none"> • Useful to clarify meaning of "crossing". • Restricting crossing to 10 m along length of water body is not justifiable.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend proposed Rule 13.5.1.1 (e) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;"	<ul style="list-style-type: none"> • Support work in wetted bed as effects based. • Allows 14 hours recovery time. • Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Amend (f) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and...".	
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Amend proposed Rule 13.5.1.2 (c) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;..." Amend (d) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and...".	<ul style="list-style-type: none"> • Support work in wetted bed as effects based. • Allows 14 hours recovery time. • Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend proposed Rule 13.5.1.3 (c) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;..." Amend (d) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and...".	<ul style="list-style-type: none"> • Support work in wetted bed as effects based. • Allows 14 hours recovery time. • Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend proposed Rule 13.5.1.4 (c) to read: The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 10 hours in duration in any 24 hour period;..." Amend (d) to read: "All reasonable steps are taken to minimise the release of sediment to the lake or river or wetland during the disturbance, and there is no conspicuous change in the colour or visual clarity of the water body beyond the lesser distance of 7 times the width of the water body or beyond a distance of 250 metres downstream of the activity; and...".	<ul style="list-style-type: none"> • Support work in wetted bed as effects-based. • Allows 14 hours recovery time. • Distance downstream of activity where conspicuous change in colour and visual clarity should be related to size of water body.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	That Schedule 15 is revised by: Dividing the region up on a more rational basis. Specifying that the receiving water targets: are	<ul style="list-style-type: none"> • Current division of region is too broad and does not reflect different water body characteristics. • Single standard for entire length of river not appropriate.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				medians, will be monitored by the ORC as part of its State of the Environmental monitoring programme, not for example in worst case scenarios of immediately after rainfall, will not be applied as maximums when implementing PC6A. Specifying more appropriate dates for those catchments that do not currently comply with the Schedule 15 targets.	<ul style="list-style-type: none"> • Could be interpreted as maximums. • A five year timeframe for compliance has not been assessed, appears stringent.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Unclear whether Table 15.1 characteristics are supposed to be complied with and by what date. • Exemptions/qualifications for colour, sediment, smell, make application very uncertain.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The discharge limits contained in Schedule 16 are revised so that they are appropriate and attainable.</p> <p>Rules in Chapter 12.C are amended to make clear that compliance with Schedule 16 limits is only required by the dates in Schedule 16.</p>	<ul style="list-style-type: none"> • Translating medians to maximums is highly conservative and not appropriate. • More restrictive than necessary to achieve water quality objectives. • Concerned even with best management practice they will be unachievable. • Timeframes not reflected in rules, this could be interpreted as limits applying from notification.
131	Other matters	Minor and consequential changes	Amend	Such other relief as is appropriate to give effect to our submission.	<ul style="list-style-type: none"> • As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	That a more substantive S32 Analysis is undertaken with adequate consideration of the alternatives, including their costs and benefits.	<ul style="list-style-type: none"> • Fails to provide level of guidance necessary to implement objectives, policies and rules. • Limits are inappropriate and may be unachievable. • Cannot be justified on current information on environmental effects of discharges. • Section 32 does not provide adequate cost benefit analysis or assessment of efficiency and effectiveness of Plan Change. Minimal assessment of the adequacy of provisions of existing plan. Does not address if rigorous enforcement of existing Plan would effectively address the issues. No assessment of social, economic, and cultural effects. • Targets and limits have been set without recognising whether attainable or suitable. • Concerned plan change will not achieve outcomes. • Not consistent with Objective A1 of NPSFW. • Not undertaking core function of RMA by controlling land use (Section 30 (c)).
203	Simplifying and streamlining	Removal of issues - general requests	Amend	That Chapter 7 is amended by including the issues that have given rise to the new objectives and policies.	<ul style="list-style-type: none"> • Assists plan users to understand why new objectives and policies have been adopted. • Clearly outlines current water quality issues.
208	Policy framework	Chapter 7 - general requests	Amend	That explanations for objectives and policies are included in Chapter 7.	<ul style="list-style-type: none"> • Provides useful context and guidance to plan users. • Many policies vague and have interpretation difficulties.
209	Discharge rules	Chapter 12 - general requests	Amend	That each of the rules in these sections [12.A-12.C] be revised to clarify the status of activities, rather than relying on the introductory notes.	<ul style="list-style-type: none"> • Introductory notes do not have legal weight. • Rules do not reflect interpretation contained in introductory notes and will result in ambiguity and confusion.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Very supportive of the aims of maintaining the existing water quality in Otago and improving it where necessary.	<ul style="list-style-type: none"> • Good water quality supports environmental, economic, social and cultural values. • Provides for sustainable management of Otago's resources.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
227	Prohibitions	Prohibitions - general requests	Amend	Rewrite to include subordination to the permitted and discretionary rules.	• All discharges under section would be prohibited regardless of permitted and discretionary rules.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Amend	Add a "catch all" discretionary rule to Section 12.C to allow discharges to water to obtain consent.	• 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.
243	Bed disturbance	Chapter 13 - general requests	Amend	That each of the rules in these sections be revised to clarify the status of activities, rather than relying on the introductory notes.	• Introductory notes do not have legal weight. • Rules do not reflect interpretation contained in introductory notes and will result in ambiguity and confusion.
248	Other matters	Supports another submission	Not Applicable	No decision requested.	• Aware that CDC and CODC have made submission on this plan change. We are in general support of these submissions [submitter numbers 308 and 309].

212 T A Whiteside & Co Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Amend rule to provide more certainty on what is considered adequate mitigation and to ensure that autumn sown cropping can continue in Otago.	• Concern about restrictions on autumn cultivation.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Amend rule to provide more certainty on what is considered adequate mitigation and to ensure that autumn sown cropping can continue in Otago.	• Concern about restrictions on autumn cultivation.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.	• Concerned proposed changes could influence management practices. • Restrict amount of nitrogen we use. • Affect potential yields and financial viability.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	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.	• Concerned proposed changes could influence management practices. • Restrict amount of nitrogen we use. • Affect potential yields and financial viability.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	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.	• Concerned proposed changes could influence management practices. • Restrict amount of nitrogen we use. • Affect potential yields and financial viability.

213 Vivienne & Greg Kerr

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Support	Support.	• No reason given.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Support	Support.	• No reason given.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	Support.	• No reason given.
19	Managing effects of land use on	Policy 7.B.1 - Address discharges	Support	Support.	• No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality	and disturbance			
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	Support.	• No reason given.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Support	Support.	• No reason given.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Support.	• No reason given.
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	Support	Support.	• No reason given.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	Support	Support.	• No reason given.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	Support	Support.	• No reason given.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	Support addition of (f)(ii).	• No reason given.
56.2	Beyond the scope	Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted	Not Applicable	Support addition of (e).	• No reason given.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	Not Applicable	Support addition of (f)(ii) and (g).	• No reason given.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	Not Applicable	Support addition of (e).	• No reason given.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Support	Support addition of (c).	• No reason given.
60	Beyond the scope	Rule 12.B.1.6 / 12.11.2.1 - Sullage, cooling water, drinking supply, pool discharge permitted	Not Applicable	Support addition of (f).	• No reason given.
61	Beyond the scope	Rule 12.B.1.7 / 12.11.2.2 - Live organisms water discharge permitted	Not Applicable	Support addition of (a).	• No reason given.
62	Beyond the scope	Rule 12.B.1.8 / 12.4.1.1 - Stormwater reticulated discharge permitted	Not Applicable	Support addition of (a)(i).	• No reason given.
65	Beyond the scope	Rule 12.B.3.1 / 12.4.2.1 - Stormwater discharge restricted discretionary	Not Applicable	Support addition of (b).	• No reason given.
125	Defining good water quality	Schedule 15 - Good quality water	Support	Support the use of Table 15.1 as a descriptive measure of water quality and Table 15.2, timeframes for catchments to meet specified measures of good receiving water quality and the maximum limits for nitrogen, phosphorus, E coli, and sediment as set down in the table.	• No reason given.
201	General support	Whole plan change (general support)	Support	Support in general the implementation of the regulatory framework as described in the Rural Water Quality Strategy to set maximum discharge limits, into Otago water bodies, for nitrogen, phosphorus, E. Coli, and sediment.	• No reason given.

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214 Willowview Pastures Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	The model should reflect a fair cross section of stakeholders, both ORC and farmers. It cannot be drawn up by environmental extremists.	<ul style="list-style-type: none"> Farmers income and business directly affected. Proposed nitrogen limits unrealistic, do not allow for different regions and farming systems in Otago. OVERSEER 6.0 is yet to be tested/peer reviewed within Otago. Concern Council will control the type of farming they see fit. Limits make farming unsustainable (contrary to RMA and ORC objectives). Nitrogen loading limits first notified on 31 March 2012. Little time to research submission. Not based on true consultation.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Seek its deletion.	<ul style="list-style-type: none"> Measurement is difficult. Rule is uncertain. Probably impossible to comply with limits in Schedule 16.

215 Alan Grant Macgregor

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Oppose	Total review of rule.	<ul style="list-style-type: none"> Limitations around quantification and measurement limits set of 5 and 40 NTU.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Total review of rule and deletion until further research available.	<ul style="list-style-type: none"> Limits unrealistic and model not tested/peer reviewed. Limits unjustifiable and lack research support. No consideration of farming types and management systems. Many areas will be untenable for farming. Contrary to RMA and ORC objectives. Poor approach to formation of the proposed plan with minimal consultation. Minimal time given to make informed and researched submission.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Deletion of this rule.	<ul style="list-style-type: none"> Rule is uncertain. Measurement is difficult, which limits effective monitoring. Compliance with limits is likely to be impossible. Poor approach to formation of the proposed plan with minimal consultation. Minimal time given to make informed and researched submission.

216 Graham Butler

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	The ORC needs to recognise that the Waitaki plains should be a special, designated area and within the area there should be provision made for different soil types to allow the calculation of nitrogen being leached to be greater than the proposed 30kg limit per year. It needs to be looked at on a case by case basis	<ul style="list-style-type: none"> Not possible to submit on levels as OVERSEER 6.0 not available. Compliance requires change from border dyke to spray irrigation (high economic cost). Water quality static and at half drinking water level.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				depending on soil type and farming type. The ORC needs to do more specific monitoring of the Waitaki plains to gain a better understanding of leaching levels in the lighter soils compared to the heavier soils.	

217 Locharburn Grazing Company

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	No decision requested.	<ul style="list-style-type: none"> • Farming practicality not been considered. • Little consideration for low impact farming of sheep, beef cattle and deer. • Soil loss has reduced since we direct drill. • Nitrogen fertiliser not used extensively on farm.

218 A P S Heckler Family Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support idea behind Plan Change.	<ul style="list-style-type: none"> • Concerned with limitations, applications, and possible cost structure affecting our economic viability. • Timeframe set is unachievable.

219 Rimu Downs Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Oppose the prohibition of stock crossing waterways to access grazing on extensive farms.	<ul style="list-style-type: none"> • Better to work on case-by-case basis rather than blanket rule. • Not economically practical to install authorised structures for every lake, river, wetland. • On extensive farms, effects of stock crossing waterways is minimal or nil.

220 Waverley Downs Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	<p>Retain permitted activity status.</p> <p>Amend N limits to ensure that N loss limits are achievable under different land use scenarios.</p> <p>Introduce differentiated N loss limits for shoulders of spring/autumn and winter where flows are high and water temperature will limit any effects of loss.</p> <p>Increase limits in sensitive zones to make these more achievable.</p> <p>Increase and stagger phase in times for achieving limits.</p>	<ul style="list-style-type: none"> • 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Retain permitted activity status.</p> <p>Amend N limits to ensure that N loss limits are achievable under different land use scenarios.</p> <p>Introduce differentiated N loss limits for shoulders of spring/autumn and winter where flows are high and water temperature will limit any effects of loss.</p> <p>Increase limits in sensitive zones to make these more achievable.</p> <p>Increase and stagger phase in times for achieving limits.</p> <p>Ensure that the use of modelling is accurate enough to predict per hectare losses under different land use scenarios including cropping.</p>	<ul style="list-style-type: none"> • Application timings of nitrogen are critical to achieve good yields. • Heavy rainfall could compromise 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 raise concerns about achievability of limits.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>Amend N limits to ensure that N loss limits are achievable under different land use scenarios.</p> <p>Introduce differentiated N loss limits for shoulders of spring/autumn and winter where flows are high and water temperature will limit any effects of loss.</p> <p>Increase limits in sensitive zones to make these more achievable.</p> <p>Increase and stagger phase in times for achieving limits.</p>	<ul style="list-style-type: none"> • Application timings of nitrogen are critical to achieve good yields. • Heavy rainfall could compromise 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 raise concerns about achievability of limits.

221 Hamish Anderson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Oppose	<p>Clarification requested:</p> <p>Is ponding just slow infiltration especially on deep alluvial silts?</p>	<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.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>Mixing zones should be allowed.</p> <p>Discharge limits should be increased allowing for mixing, not set at the desired receiving water standards.</p>	<ul style="list-style-type: none"> • Disconnect between first principles and Schedule 16. • Standards too tight for the environmental outcomes, only good for enforcement purposes. • Not enough work done to prove standards can be met. • Best practice options should be sensible and not detrimental. • AgResearch report shows a drop of 10% in dairy and 50-100% sheep/beef profits if all best practice measures adopted.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Limits should be increased to allow for mixing. Misleading as targets in consultation (Table 15.1) don't line up with proposed standards.
202	General opposition	Whole plan change (general opposition)	Oppose	A delay in the implementation of the plan change until enough work is done to prove that rule changes and limits proposed are workable and achievable without major economic and social disruption to the rural sector.	<ul style="list-style-type: none"> Needs to be socially and economically sustainable, as well as environmentally. Can ruin basically a good idea with overly high standards which lead to economic and social decline.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Agree with the ORC's plan to allow farmers to get on with farming provided their discharges as a result of their farming activities do not have major impact on waterways.	<ul style="list-style-type: none"> First principles seemed reasonable and understandable.

222 Fulton Hogan Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Redraft to provide more certainty. This could be achieved by: <ul style="list-style-type: none"> 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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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. 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>minor effects or are short-term.</p> <ul style="list-style-type: none"> • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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/m^{3m}."</p> <p>Define the word "sedimentation"</p> <p>The water standard adopted should have undergone a thorough assessment of the likelihood that the standard could be achieved. 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 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.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	<p>Change the rule to replace the term "no change" in sub-clause (a) with a more achievable test as follows:</p> <p>"(ii) Where it contains any of the contaminants listed in Schedule 16, the quantity of contaminants in the discharge does not exceed the limits given in Schedule 16,</p> <p>(iii) Where there is no change to the water level or hydrological function, and no damage to fauna, or</p>	<ul style="list-style-type: none"> • Plain meaning of "no change" provides a very stringent test that is unlikely to be met.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				New Zealand native flora in or on any Regionally Significant Wetland, is a permitted activity."	
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Change the Schedule to have each description of the water quality characteristics complemented by numerical standards.	• Narrative statements are uncertain and subject to a range of interpretations.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Withdraw this table.	• No technical information has been cited that compares proposed standards with appropriate water quality guidelines, or provides comparison of standards against the status quo, or whether gap between them can be bridged by applying these standards.
132	Permitted contaminant discharges	I series maps	Amend	Improve the resolution of the planning maps to ensure it can easily be determined where the water quality areas are.	• Resolution of maps is too low.
139	Permitted contaminant discharges	J series maps	Amend	Improve the resolution of the planning maps to ensure it can easily be determined where the water quality areas are.	• Resolution of maps is too low.
208	Policy framework	Chapter 7 - general requests	Amend	Specific policies are needed to provide the appropriate guidance for the rules.	• Plan change relies on rules that have uncertainties in their interpretation.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Seek to ensure certainty is provided across all activities, and not a select few.	• Plan change is uncertain. • Inappropriate level of discretion retained by ORC. • Discharges with low environmental risk is prohibited.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Include a permitted activity rule in relation to discharges of sediment not associated with a rain event.	• How discharges of sediment from activities involving water that is not rain are addressed is not clear.
243	Bed disturbance	Chapter 13 - general requests	Amend	Amend.	• Proposed rules do not provide certainty and is difficult to determine status of activities. • Reduces certainty about environmental outcomes that can be expected.

223 Jeremy Bisson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1.1	Simplifying and streamlining	Section 7.1 - Introduction	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Oppose	Opposes proposed 7.A.1.	• 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.
91	Discharge rules	Section 12.C - Other discharges	Oppose	No decision requested.	• Proposed rules represent a comprehensive reduction of existing controls.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	Dairy effluent discharge should be a controlled activity requiring site specific resource consents.	• New rule is inadequate in controlling application of effluent and its effects on water quality.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Clarification of why the methods have been repealed.	• Public consultation was about less regulation and working with farming community to ensure good farming practices are used. • Sees this as the one section that could be used to actually achieve this.

224 Holcim (New Zealand) Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Oppose	Delete the objective.	<ul style="list-style-type: none"> • Does not provide any additional guidance than already provided for in RMA. • "where necessary" introduces uncertainty.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Redraft the policy to provide more certainty. This could be achieved by: <ul style="list-style-type: none"> - 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"> • Policy contains broad language and doesn't provide link between relevant objectives and rules. • Scope for misinterpretation and differences of opinions between planners.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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 the limits will be applied.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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. • 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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 don't fit under Rules 12.A or 12.B are caught. • Doesn't give effect to RPS and RMA, by recognising mixing zones.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					that all discharges that don't fit under Rules 12.A or 12.B are caught.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	<p>Change the rule to replace the term "no change" in sub-clause (a) with a more achievable test as follow:</p> <p>(ii) Where it contains any of the contaminants listed in Schedule 16, the quantity of contaminants in the discharge does not exceed the limits given in Schedule 16,</p> <p>(iii) Where there is not change to the water level or hydrological function, and no damage to fauna, or New Zealand native flora in or on any Regionally Significant Wetland, is a permitted activity.</p>	<ul style="list-style-type: none"> • Plain meaning of "no change" provides a very stringent test that is unlikely to be met.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Change the Schedule to have each description of the water quality characteristics complemented by numerical standards.	<ul style="list-style-type: none"> • Narrative statements are uncertain and subject to a range of interpretations.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Withdraw this table.	<ul style="list-style-type: none"> • No technical information has been cited that compares proposed standards with appropriate water quality guidelines, or provides a comparison of standards against the status quo, and whether gap between them can be bridged by applying these standards.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
132	Permitted contaminant discharges	I series maps	Amend	Improve the resolution of the planning maps to ensure it can easily be determined where the water quality areas are.	• Resolution of maps is too low.
139	Permitted contaminant discharges	J series maps	Amend	Improve the resolution of the planning maps to ensure it can easily be determined where the water quality areas are.	• Resolution of maps is too low.
208	Policy framework	Chapter 7 - general requests	Amend	Specific policies are needed to provide the appropriate guidance for the rules.	• Plan change relies on rules that have uncertainties in their interpretation.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Seek to ensure certainty is provided across all activities, and not a select few.	<ul style="list-style-type: none"> • Level of uncertainty for activities not specifically addressed. • Inappropriate level of discretion retained by ORC. • Policies don't provide appropriate guidance. • Discharges that are low environmental risk are prohibited.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Include a permitted activity rule in relation to discharges of sediment not associated with a rain event.	<ul style="list-style-type: none"> • How discharges of sediment from activities involving water that is not rain are addressed is not clear. • Proposed rules do not provide a clear indication or certainty about what is required for compliance.
243	Bed disturbance	Chapter 13 - general requests	Amend	Amend.	<ul style="list-style-type: none"> • Proposed rules do not provide certainty • It's difficult to determine status of activities. • Reduces certainty about the environmental outcomes that can be expected.

225 Preserve Our Water Society Inc

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Oppose	Original Objective 7.5.1 should remain as it is.	• Proposed objective fails to protect existing water quality and will allow water to become polluted.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	This rule needs to be revised.	<ul style="list-style-type: none"> • Can't protect groundwater by relying on Overseer. • ORC already uses Overseer during consenting but water quality is still deteriorating. • In ground monitoring is needed to pick up issues before nitrates affect groundwater.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	Effluent discharge should be a discretionary activity requiring resource consent.	<ul style="list-style-type: none"> • Provides inadequate controls on effluent application to land. • ORC needs to follow E-Can and E-Southland and require consents for effluent discharges.
132	Permitted contaminant discharges	I series maps	Amend	More information on Lakes Area maps [1-6].	• Nitrogen sensitive area should be expanded to include source area of the water which feeds back area of Hawea aquifer.
222	Beyond the scope	Beyond the scope - general	Not Applicable	Composting toilets added as permitted activity.	• Will address concern regarding leaching of nitrates from septic tanks and could include conditions for installation.

226 Dave Shaw

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Clarify: - What is a significant waterway and suggested mitigation responses - Whether resource consent is required for the mitigation responses. Delay implementation for 12-24 months.	<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.
220	Other matters	Process	Not Applicable	No decision requested.	• Only heard about changes from Federated Farmers on 18 April so didn't have time to mitigate with rules having

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					immediate effect. • Should have heard about changes from ORC in the first instance.

227 Medical Students For Global Awareness

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Put the plan through with no changes, or, if possible form a more comprehensive plan which will help both enforce and support the changes in farming practices required to promote clean, unpolluted waterways.	<ul style="list-style-type: none"> • Water quality is paramount for a sustainable, healthy future for all New Zealanders. • Ability to swim, gather food, enjoy our waterways plays a big role in the NZ lifestyle.
211	Implementation	Compliance, enforcement, education	Not Applicable	That ORC along with the proposed changes provide informational support to those required to make changes.	<ul style="list-style-type: none"> • Continued education needed. • Actively make updated information readily available to all farmers. • Cleaning up waterways is a public issue stemming from practices we as a nation use to support our economy, • It is unfair to make it all the farmers' responsibility when it is everyone's responsibility. • ORC is a leadership body that can get this message to central government and the general public.
244	Alternative approaches	Other approaches	Not Applicable	That ORC along with the proposed changes provide financial support to those required to make changes.	<ul style="list-style-type: none"> • ORC, in consultation with public, corporate sponsorship and central government, should help reduce financial burden on farmers for cleaning up our waterways. • Cleaning up waterways is a public issue stemming from practices we as a nation use to support our economy, • It is unfair to make it all the farmers' responsibility when it is everyone's responsibility.

228 John Newlands Farming Company

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend to ensure nitrogen loading levels are sustainable and realistic for all affected parties. More time to allow for further research to support this submission.	<ul style="list-style-type: none"> • Overseer has yet to be tested within Otago. • Nitrogen loading limits unrealistic. • Limits don't account for different parts of region and farming systems. • Proposed limits will make my farming system untenable and is contrary to RMA and ORC objectives. • Current water quality is excellent with current farming methods. • Need a more accurate measurement tool than Overseer. • Notification and submission period didn't allow time to research and consult on impacts of rule 12.C.1.3.
132	Permitted contaminant discharges	I series maps	Did not specify	No decision requested.	<ul style="list-style-type: none"> • Water quality in aquifer is affected by all land uses but map places all risk and responsibility on land owners north of Gemmel's Crossing Road [I1 Kakanui-Kauru Aquifer].

229 Lauren O'Brien

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Limit passage of stock through larger bodies of water.	<ul style="list-style-type: none"> • Peninsula has many small creeks that would be difficult and expensive to fence stock out. • Landowners no longer keep stock due to costs. • Land is being overrun with weeds. Adding more rules and costs will only add to this problem.

230 Rowley Family

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	This rule is too wide ranging.	<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.

231 N Anderson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	<p>Each area needs to be considered for its own merits.</p> <p>That on lower country ... approaches more prone to damage and large numbers of large poing cattle are regularly crossing reasonably large streams/rivers, bridges and culverts plus the fencing off of waterways is essential for water quality and protection of the flora and fauna of such areas.</p>	<ul style="list-style-type: none"> • Stock regularly moved for health/food reasons (not seasonal muster). • Impractical, inefficient, unnecessary and expensive to put in bridges and culverts. • Too inflexible, need to consider number/type of animals, size/significance/type of waterway, duration of disturbance.
202	General opposition	Whole plan change (general opposition)	Amend	To amend the plan change to provide for farming practices and activities.	<ul style="list-style-type: none"> • Impacts on farming operation and viability.

232 Kawarau Station Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Oppose	Delete rule.	<ul style="list-style-type: none"> • Unable to prevent all runoff (particularly stock waste) in storm event.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	Oppose	Delete rule.	<ul style="list-style-type: none"> • Unable to prevent all runoff (particularly stock waste) in storm event.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	Oppose	Delete rule.	<ul style="list-style-type: none"> • Contour irrigation may become prohibited.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	Delete rule.	<ul style="list-style-type: none"> • Compliance may be unattainable in storm. • "Measure" needs to be clearly defined.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Amend to define sedimentation.	<ul style="list-style-type: none"> • What is sedimentation?
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Withdraw rule 12.C.1.3.	<ul style="list-style-type: none"> • Use of Overseer not proven to be most effective tool. • Specific problems on irrigated land.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Amend to remove requirement of "no change in the water level or hydrological function".	<ul style="list-style-type: none"> • Unattainable to continue contour irrigation.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Amend to include definition of water supply transport system.	<ul style="list-style-type: none"> To clarify what rule pertains to.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Amend to take out reference to visual clarity or further define.	<ul style="list-style-type: none"> No increase in visual clarity unattainable. Effect of livestock needs to be significant and more than minor.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Amend to include additional stock movement activity.	<ul style="list-style-type: none"> Need additional ability to move stock outside seasonal muster e.g. for grazing.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Delete.	<ul style="list-style-type: none"> Definition of seasonal muster different for each property. Unable to move stock between grazing blocks. Effect needs to be monitored not absolute prohibition.

233 Central Otago Environmental Society Inc

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Add clear, unequivocal statements identifying the base standards for quality water from the perspectives of health, recreation and ecological values.	<ul style="list-style-type: none"> Agriculture, horticulture, forestry, construction and infrastructure necessary activities. Discharges that degrade water quality threaten public rights and interests. Acceptable balance between less than perfect water standard, and that which is not acceptable by way of pollution.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Timeframes to meet specified measures - add intermediate compliance objectives. Further define catchments, taking account of variations in water quality between lower and upper reaches and the possibility that higher standards may be required for as yet unpolluted catchments.	<ul style="list-style-type: none"> Without immediate pressure there will be procrastination. ORC needs to be seen moving quickly. Blanket classification of catchments (Areas 1-5) overlooks differences. Risks unintended degradation.
211	Implementation	Compliance, enforcement, education	Amend	Add a section or schedule indicating how discharges will be monitored and what actions will follow from proven non-compliance. Provide for the active involvement of interested individuals and groups as voluntary water quality monitors of their local streams and rivers. Include a provision for robust and regular reporting on the condition of Otago's streams, rivers and lakes.	<ul style="list-style-type: none"> Effects-based strategy relies on stringent monitoring and compliance programme. Costs of implementing monitoring regime concerning. Potential for volunteers as water quality monitors. Keep public informed to maintain support.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Supports adoption of an effects-based strategy.	<ul style="list-style-type: none"> Notes continuing deterioration due to non-compliance with current plan. Concerned that leaving water quality management with land managers alone is unrealistic. Plan change ignores other important issues that affect water quality - water availability and land use intensification. Plan must observe precautionary principle of "do no harm" and deny activities likely to risk water quality.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	Include as an issue; the intensification of land uses increases the potential of adverse effects on waterways and therefore requires strict control, management and monitoring.	<ul style="list-style-type: none"> Increasing water supply encourages intensification, which heightens risk to water quality. Effects-based strategy Increases cost environmentally and financially if it goes wrong. Land use be controlled for precautionary approach.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

234 Michael O'Connor

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
54.2	Beyond the scope	Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, stormwater and other specified contaminants, and discharges from industrial and trade premises	Not Applicable	Delete herbicides, pesticides and water.	• Who decides what a contaminant is?
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Oppose	Delete fertiliser.	• Fertiliser not a contaminant, soil and plant enhancers.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Clarify meaning of disturbed land to water.	• Weather can not be predicted. • Rain on worked up land results in discharge.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	Clarify meaning of "a composting process".	• Grass sprayed with roundup results in composting, so do leaves off trees.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Oppose	Delete 12.C.1.1 (i)(ii)(a)(b).	• Rain can make runoff last for days.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Delete 12.C.1.2.	• Rain can make runoff last for days.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Increase kilograms nitrogen per ha on different types of land where necessary.	<ul style="list-style-type: none"> • One figure for all land types does not work. • Border dyke land will become uneconomic for dairying/cropping. • Border dyking has low carbon footprint compared to alternative. • Will result in mass denuding of Waitaki Plains, causing wind evaporation/erosion, depletion of bird life, and poor existence for farm animals and people. • If N figures stay same, farms will have to destock. • Rule does not promote ORC mission statement "To promote the sustainable development and enhancement of Otago resources".
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Change to suit type and level of farming that now exists and to allow for future change of land use to occur as it does at present.	• No reason given.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Change 100 metres to read 500 metres.	• Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Change 100 metres to read 500 metres.	• Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Change 100 metres to read 500 metres.	• Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Change 100 metres to read 500 metres.	• Maintenance in Waianakarua River wetted bed at low flow discolours over 200 m downstream, higher flows would carry colouring further.

235 Dulce-Domum Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	[Should say] 30 kg of Nitrogen per hectare per year, in line with other areas of Otago, as opposed to the proposed 10 kg per ha.	<ul style="list-style-type: none"> • Property over Shag River Alluvium Aquifer. • 10 kg limit does not take into account ongoing fertiliser improvements e.g. Eco-N, and it curtails future development. • Development of plant species with more efficient N uptake.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Supports the concepts of water quality improvement.	• Apart from Rule 12.C.1.3.

236 C C & G A Raughan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Oppose	Delete rule and investigate lots more.	<ul style="list-style-type: none"> • What is rainfall? • No sedimentation is impossible to achieve. • Achieving 5 NTU in 12 hrs seems impossible.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow for situations where it is not feasible to put in a stock crossing.	<ul style="list-style-type: none"> • What is seasonal muster? • Fencing spring fed stream on property with steep sides would cause major erosion (digger and bulldozer work).

237 David Blair

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> • Consider carrying capacity for sensitive areas. • Consider destocking non-performing farmers. • Consider effect of abstraction on concentrating pollutants.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> • Consider carrying capacity for sensitive areas. • Consider destocking non-performing farmers. • Consider effect of abstraction on concentrating pollutants.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> • Consider carrying capacity for sensitive areas. • Consider destocking non-performing farmers. • Consider effect of abstraction on concentrating pollutants.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> • Consider carrying capacity for sensitive areas. • Consider destocking non-performing farmers. • Consider effect of abstraction on concentrating pollutants.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Support	General support with reservations. Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> • Consider carrying capacity for sensitive areas. • Consider destocking non-performing farmers. • Consider effect of abstraction on concentrating pollutants.
226	Managing the effects of land use on water quality	Land use controls	Not Applicable	Want ORC to consider other Land Resources rules to back up permitted activities.	<ul style="list-style-type: none"> • Consider carrying capacity for sensitive areas. • Consider destocking non-performing farmers.

238 Silver Fern Farms Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Simplifying and streamlining	Section 7.3 - Issues related to point source discharges to water	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.
11	Simplifying and streamlining	Issue 7.4.1 - Land use activities	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Amend	That the values of industry and the provision for dilution/mixing zones are appropriately recognised and retained. This objective also needs to link to Schedule 15, if this was what was intended.	<ul style="list-style-type: none"> • Excludes NPSFW requirement that industry and dilution are values. • "Good water quality" vague. • No link to Schedule 15.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
29	Human sewage etc	Section 7.7 - Policies for point source discharges	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.
31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	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.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	Amend	These inconsistencies [re mixing zones] need to be rectified. 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"> • 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.
52	Discharge rule framework	Sections 12.A – 12.C - Introduction to discharges of contaminants or water	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.
60	Beyond the scope	Rule 12.B.1.6 / 12.11.2.1 - Sullage, cooling water, drinking supply, pool discharge permitted	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.
67	Human sewage etc	Rule 12.B.4.1 - New discretionary trade discharge	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.
92	Discharge rule framework	12C Note box - How the rules apply	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste	Amend	Withdraw prohibited activity rule 12.C.0.5.	<ul style="list-style-type: none"> • No provision for reasonable mixing.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		systems, compost, silage prohibited		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"> • 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.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Support	Retain.	<ul style="list-style-type: none"> • Provide for mixing zone however, shows inconsistency with other parts of plan.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Support	Retain.	<ul style="list-style-type: none"> • Provide for mixing zone however, shows inconsistency with other parts of plan.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Support	Retain.	<ul style="list-style-type: none"> • Provide for mixing zone however, shows inconsistency with other parts of plan.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Support	Retain.	<ul style="list-style-type: none"> • Provide for mixing zone however, shows inconsistency with other parts of plan.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	This is inconsistent with other parts of plan where encouraging land owners/users to adopt best practice.	<ul style="list-style-type: none"> • Indicates ORC no longer wants industry led codes of practice or other voluntary methods.
124	Simplifying and streamlining	Information requirement 16.3.3 - The discharge of water or contaminants	Oppose	Seeks the retention of information requirements for the discharge of water contaminants or the replacement with a comparative alternative. In the alternative, we seek clarification as to whether the general information requirement (section 16.2) will be considered as sufficient information for discharge to water consent applications.	<ul style="list-style-type: none"> • Queries intention of its removal. • Could infer information under general requirements is sufficient, or discharges won't be allowed.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Plan change 6A needs to reflect that such a high water quality standard is not reasonable or necessary for all water bodies and that such a "one size fits all" approach is an inadequate approach.	<ul style="list-style-type: none"> • Koau Branch too dangerous for contact recreation. • Queries if water standards suitable for water use.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	The standards/targets set out in the Schedule (along with the wider plan change) need to be withdrawn until these matters can be worked through in a collaborative manner.	<ul style="list-style-type: none"> • Table 15.1 simplistic and unlikely to be useful. • Good water quality not well defined. • Water being "colour free" unachievable. • Little technical support.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	That the implementation and enforcement of new standards is delayed until after the submission/hearing process.	<ul style="list-style-type: none"> • Timeframes are effective immediately. • Questions the appropriateness of such high standards. • Need to reflect actual state of what people expect.
202	General opposition	Whole plan change (general opposition)	Oppose	In the first instance that the entire Plan Change 6A is withdrawn. That Plan Change 6A is not implemented and enforced until after due process (submissions and hearing) has been undertaken.	<ul style="list-style-type: none"> • Inconsistency between introduction and actual changes made. • ORC has mislead community as focused on non-point source. Plan includes point source. • Removal of provisions for mixing zones. • Prohibited activities. • Immediate effect given. • Clarification of animal waste system. • Insufficient clarity. • Inadequate section 32 Report. • Insufficient technical analyses.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Limited grounds for immediate implementation of rules. Need resolution over proposed changes contrary to RMA. Our consented discharge could be prohibited, would close Finegand operation as no suitable alternatives. Intent of RMA s86B to protect water bodies in poor state, nothing to indicate Clutha requires immediate action. Highjacks/bypasses planning process. Given removal of mixing zones counter to RMA, NPSFW and courts, PC6A so highly flawed it should not be progressed at all, let alone have immediate effect.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Would like clarification on what the intention of the plan changes are.	<ul style="list-style-type: none"> Introduction gives impression PC6A based on Rural Water Strategy, but it covers more than rural and farming discharges.
227	Prohibitions	Prohibitions - general requests	Oppose	<p>Withdraw prohibited activity rules 12.C.0.1 - 12.C.0.5</p> <p>In the alternative, change the activity status of these rule to discretionary.</p>	<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.

239 N O Grant

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	Delete this rule.	<ul style="list-style-type: none"> Impossible to implement. Excludes stock from drinking water. Makes farm financially unviable and impossible to operate. Would require fencing and numerous bridges.

240 Forest Range Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend rule to give flexibility with monitoring and assessing penalties for farms in this situation.	<ul style="list-style-type: none"> Impact unfairly farmers with extensive farms. N fertiliser applied every 3 years at large applications, may have short term effect. If farmers unable to maintain fertility, erosion of property rights. Decrease incomes, negative effect of erosion.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Oppose	These rules need deletion or considerable amendment to provide common sense and flexible solutions that will allow livestock enterprises on high country properties to continue farming in a sustainable manner.	<ul style="list-style-type: none"> Impact farmers on extensive properties. Stock could cross river in paddock frequently. Fencing not possible or affordable. Grazing short period but may affect water quality outside of conditions.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Oppose	These rules need deletion or considerable amendment to provide common sense and flexible solutions that will allow livestock enterprises on high country properties to continue farming in a sustainable manner.	<ul style="list-style-type: none"> Impact farmers on extensive properties. Stock could cross river in paddock frequently. Fencing not possible or affordable.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	These rules need deletion or considerable amendment to provide common sense and flexible solutions that will allow livestock enterprises on high country properties to continue farming in a	<ul style="list-style-type: none"> Impact farmers on extensive properties. Stock could cross river in paddock frequently. Fencing not possible or affordable.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
125	Defining good water quality	Schedule 15 - Good quality water	Did not specify	It is essential that ORC contamination limits and monitoring programmes provide flexibility to take intermittent but significant short term adverse effects on water quality into account in relation to the anomalies described.	<ul style="list-style-type: none"> • Undermine current conservation work. • Rules need to provide common sense and flexible solutions.

241 Fonterra Co-operative Group Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Oppose	Delete the objective.	<ul style="list-style-type: none"> • Provides no addition guidance than RMA and RPS • No guidance to "where necessary".
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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"> • 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive	Amend	Delete or change the policy to provide a clearer	<ul style="list-style-type: none"> • Provide clarity on what should be encouraged.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		management and innovation		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"> • Term "adaptive management" not defined. • Meaning of term "reduce the discharge" not clear. • Needs to complement objective to achieve water quality targets.
31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	Did not specify	No decisions requested.	<ul style="list-style-type: none"> • Deleting 7.7.5 but not 7.7.6 appears contradictory.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	Amend	Specific policies are needed to provide the necessary framework for appropriate permitted and prohibited activities.	<ul style="list-style-type: none"> • Needs specific, clearer policy framework for permitted and prohibited activities to meet intent of PPC6A.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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"
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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 objective attainment".
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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 objective attainment".
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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 objective attainment".
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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"
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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"> • 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	<p>Withdraw Rule 12.C.1.3 and the associated Maps I1 - I6.</p> <p>ORC should initiate a collaborative process with a broad range of stakeholders to develop a rule that is more technically robust and has broad community support.</p>	<ul style="list-style-type: none"> • Permitted activity maximum nitrogen leaching rate rule based on Overseer is appropriate but current rule too deficient. • Inappropriate discretion by ORC to determine compliance. • Using one model version which is not operational is uncertain and inappropriate. • Would version 6 be available when model updated. • Insufficient analysis on proposed zone boundaries. • More technical assessments needed for appropriate thresholds. • Need to specify loading limit based on receiving water quality. • Need a qualified person to undertake Overseer. • Need clarification on limits applying as whole property average. • No clear framework for resource consents.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>Change the rule to incorporate a maximum daily discharge quantity and to remove any possible contradiction with Rule 12.C.0.5.</p>	<ul style="list-style-type: none"> • Could allow contamination of water supplies. • Discharge limit to be base on science and range of potential hydrogeological settings in Otago.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	<p>Change the rule to remove the reference to Schedule 16.</p> <p>Change the rule to remove the absolute requirement for "...no change to the water level or hydrological function..."</p>	<ul style="list-style-type: none"> • Schedule 16 extremely difficult to meet. • Not justified to ensure attainment of receiving water standards. • Clause (ii)(a) "no change" results in rule having any actual application.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Include a definition of "water supply transport system"	<ul style="list-style-type: none"> • Term not defined.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	<p>Delete this rule and replace it with a permitted activity rule.</p> <p>Change the wording of clause (i) to make it clear that this would only apply to discharges that were legally authorised prior to 31 March 2012.</p>	<ul style="list-style-type: none"> • Rule more effective and efficient if permitted activity. • Not appropriate for unauthorised discharge to be restricted discretionary and have notification precluded.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Change this rule to remove the absolute references and replace them with independently verifiable standards such as a maximum turbidity change.	<ul style="list-style-type: none"> • Literally no reduction in visual clarity allowed. • Any disturbance would not be permitted. • Provide certainty that rule does not apply unless significant adverse effects.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Oppose	Delete this rule.	<ul style="list-style-type: none"> • Provided for in Rule 13.5.1.8A.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Change this rule to specify independently verifiable standards such as a maximum turbidity change. Change the reference to "seasonal muster" and replace with more specific quantifiable limits that would ensure the attainment of a numerical water quality objective.	<ul style="list-style-type: none"> • Absolute prohibition is not justified based on environmental outcomes. • Potentially unnecessary expenditure to land owners.
121	Simplifying and streamlining	Chapter 15 - Methods	Amend	Change the plan to provide a clear implementation method that provides support for voluntary and/or regulatory codes of practice or standards that would assist in the achievement of specified environmental outcomes.	<ul style="list-style-type: none"> • Benefit to collaboratively developing codes of practice and standards. • Potentially used as regulatory provisions.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Withdraw this table.	<ul style="list-style-type: none"> • Replaced with clear narrative and numerical standards. • Need to develop with input from Otago community.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Withdraw this table.	<ul style="list-style-type: none"> • Complementary analysis needed to determine appropriate standards. • Technical report needed to provide evidence for foundation of rules. • Withdraw until worked collaboratively with community.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	The schedule and associated maps should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> • Don't understand logic behind discharge limits. • No technical report that rationalises limits or locations. • Withdraw until collaboratively worked with community.
132	Permitted contaminant discharges	I series maps	Oppose	Withdraw Maps 11-16 associated with Rule 12.C.1.3.	<ul style="list-style-type: none"> • Insufficient analysis on proposed zone boundaries. • Map resolution not sufficient • Map must be of detail so stakeholder knows where rule applies.
139	Permitted contaminant discharges	J series maps	Oppose	Maps associated with Schedule 16 should be withdrawn until matters can be worked through in a collaborative manner with the Otago community.	<ul style="list-style-type: none"> • Resolution inadequate for stakeholders to know where discharge limit area.
202	General opposition	Whole plan change (general opposition)	Oppose	The plan change is not in its current form, an appropriate mechanism to manage the quality component of the Otago region's water resource and should be modified through appropriate changes as required to address the concerns identified within the DairyNZ submission and this submission.	<ul style="list-style-type: none"> • Does not meet expectations of community involvement in objective setting. • Does not meet expectations of effective and practical implementation. • Does not meet expectations of assessment against and delivery of other community objectives, especially economic outcomes. • No linkage of existing water quality to support blanket region policy. • Lack of effects basis for general N loss limits at broad level.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Moving away from reasonable mixing. • Subjectiveness of narrative water quality standards leaving undue discretion to ORC. • Extensive use of prohibited status. • Impacts on existing, legal higher N loss land uses. • If practical options currently exist to allow land holders to undertake monitoring.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Amend	Include a rule for proposed or existing activities that would otherwise default under S 87B of the RMA to be discretionary activities, with some specific guidance on what applicants need to do to obtain a resource consent.	<ul style="list-style-type: none"> • No guidance for resource consent applications.
248	Other matters	Supports another submission	Not Applicable	Fonterra generally supports the submission of Dairy NZ on the Proposed Plan Change with the emphasis given to the points [in their own submission].	<ul style="list-style-type: none"> • Supports Dairy NZ submission [submitter number 146].

242 Rod Philip

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	I seek the level raised to 40 kgs/ha/yr.	<ul style="list-style-type: none"> • 10 kgs/ha/yr is not a reasonable level.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	This clause needs some context.	<ul style="list-style-type: none"> • No reason given.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Support this clause.	<ul style="list-style-type: none"> • No reason given.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Support	Support this clause.	<ul style="list-style-type: none"> • No reason given.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Support this clause.	<ul style="list-style-type: none"> • No reason given.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Support this clause.	<ul style="list-style-type: none"> • No reason given.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Support	Support these clauses.	<ul style="list-style-type: none"> • No reason given.

243 Otago Rock Lobster Industry Organisation

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
201	General support	Whole plan change (general support)	Support	Strongly support the introduction of Plan Change 6A to bring into effect the NPSFW.	<ul style="list-style-type: none"> • No reason given.
244	Alternative approaches	Other approaches	Not Applicable	<p>Include in the plan change a realistic process by which the parties impacted on by the change can establish recognised Development and Management Programmes in order to progress toward compliance with the National Fresh Water Standards.</p> <p>Establishment of an agriculture and forestry based group to oversee the initiation of programmes.</p> <p>A rate be levied on those parties that don't participate in management plan and compliance initiatives, to cover the cost of monitoring their discharges and compliance with fresh water standards.</p>	<ul style="list-style-type: none"> • There needs to be time to change practices and implement change. • Degrading of freshwater has had significant impact on coastal marine environments i.e. Kelp forests on the Otago coast. • Degradation has impacted on commercial marine operations i.e. Otago Lobster Industry. • Changing rules won't change behaviour. Time to set out prescriptive requirements and start managing catchments.

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244 D J & N A McLaren

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
220	Other matters	Process	Not Applicable	No decision requested.	<ul style="list-style-type: none"> Poor communication from ORC on plan change. Lack of awareness of farmers of changes and the future effect for their farming. Financial implications from fencing of waterways.

245 Richard Plunket

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Would like to see the ORC wait for OVERSEER version 6 to be released before determining where the leaching level for nitrogen be set at, as the nitrogen leaching may alter dramatically under version 6.	<ul style="list-style-type: none"> Uncertainty of using version 6 as hasn't been released so can't determine leaching at present. Waitaki will struggle to meet limits but can't be certain until version 6 is available. There may be financial and operational implications if can't meet the limits.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	In support of an effects-based plan.	<ul style="list-style-type: none"> No reason given.

246 Otago Commercial Fishing Sector

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
208	Policy framework	Chapter 7 - general requests	Amend	Include Policies and Objectives relating to the effects of land use on water quality where freshwater interacts with the marine environment.	<ul style="list-style-type: none"> To create a link between the aims of the Water Plan and Coast Plan.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	<p>ORC to discuss their approach with ECan to find ways of improving it.</p> <p>Include land-use controls to support targets and objectives.</p>	<ul style="list-style-type: none"> Concerned about effects-based approach. Prefer the approach taken by ECan in its draft Land and Water Regional Plan. Not confident that the approach will fully mitigate the problem of non-point source discharges. Monitoring non point source discharges is a near impossible task.
226	Managing the effects of land use on water quality	Land use controls	Amend	Include relevant land-use controls in the Plan which, based on the best available scientific information, would support the proposed targets and objectives.	<ul style="list-style-type: none"> Will make the plan enforceable and provide certainty for land-users. Not confident that the Plan would comply with NPSFW. Plan needs to be enforceable and supported by methods and rules to avoid over-allocation.

247 Viewmont Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Review of rule.	<ul style="list-style-type: none"> Limits unrealistic and based on a model which is yet to be tested / peer reviewed. No consideration given to varying farming types and land management system.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Will make farming untenable which conflicts with RMA and ORC objectives. • Limits are unjustifiable with lack of research to support. • Inadequate consultation undertaken and time given to make an informed submission.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Deletion of this rule.	<ul style="list-style-type: none"> • Rule is uncertain • Complex measurement limits the ability for effective monitoring. • Likely meeting limits is impossible which will impact farming.

248 Ravensdown Fertiliser Co-operative Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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, 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Supports the intent of Policy 7.B.4 as it is currently written.	<ul style="list-style-type: none"> • Policy is overall enabling and proactive.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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	<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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				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).	capacity of the waterbody, with each land use determining how they contribute to that limit. <ul style="list-style-type: none"> • 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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	Support intent of rule.	<ul style="list-style-type: none"> • Standards are considered to be generally pragmatic and practical.
56.2	Beyond the scope	Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted	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.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	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 ambiguousness of (g). • Amendment of rule is needed for clarity.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
68	Human sewage etc	Rule 12.B.4.2 - New discretionary other discharge	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Amend	Opposes the prohibited activity status included in Rule 12.C.0.1 and seeks the provision of these	<ul style="list-style-type: none"> • Prohibitions need to give certainty. • Activities listed are broad and undefined, leaving

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				activities to be addressed in any discretionary activity rule.	discretion with ORC to determine prohibition. <ul style="list-style-type: none"> • 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	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).
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Oppose	Opposes the prohibited activity status included in Rule 12.C.0.5 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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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"> • Terms 'saturated land' and 'ponding' are not defined or effects based. • 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Seeks the retention of the permitted activity status for the discharge of nitrogen to groundwater, [but] opposes a number of matters and wishes to see consequential changes as required to meet the other significant concerns raised above.</p> <p>Seeks clarification of the activity status for a discharge of nitrogen from land to groundwater should it not comply with Rule 12.C.1.3, and would seek such an activity be restricted discretionary.</p> <p>Seeks the opportunity to work with Otago Regional Council to resolve the consequential changes required.</p>	<ul style="list-style-type: none"> • 'One size fits all' approach inappropriate. • Not convinced limits supported by relevant and robust science. • 10kg limit appears unachievable by a range of activities. • Not clear what activity status will be for activities that don't achieve limits. • Practicality of demonstrating compliance with limits needs to be questioned. It is not clear what is required. • It is not appropriate to identify a particular version of Overseer in provisions. By 2019 Overseer 6 may have been superseded and may not be appropriate to use anymore. • Rule does not stipulate ORC staff will be certified in use of OVERSEER. Risk of uncertainty • If consents aren't to be granted then need an approach that safeguards the equity of existing user's investments in existing farm systems. • Inadequate Section 32. Does not evaluate potential impact of farm systems, costs of operation and productivity potential. Indicates unbalanced Section 32 has been undertaken.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Oppose	<p>Seeks clarification of the activity status for a discharge of contaminants from any animal waste system to land should it not comply with Rule 12.C.1.4, and would seek such an activity to be restricted discretionary.</p>	<ul style="list-style-type: none"> • Unclear what the activity status becomes if rule isn't complied with. • Appears to default to prohibition which is opposed.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	<p>Supports in principle the permitted activity rule, [but] seeks amendment to Rule 12.C.1.5 to read as follows or similar:</p> <p>"The discharge of water (including groundwater) to water (including surface water), or water to a Regionally Significant Wetland. "</p> <p>"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>	<ul style="list-style-type: none"> • Clarification as to whether the term 'water to water' includes groundwater to surface water. • Concern about the inability of existing and future farming operations to meet limits. • Condition (a) is ambiguous. • Section 12.C applies to any discharge not specifically provided for in sections 12.A or 12.B, therefore a discharge of contaminants from an animal waste system to land would be prohibited by default.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Seeks issues relating to Schedule 16 addressed, and clarification of the activity status for a discharge of water (including groundwater) to water (including surface water) should it not comply with Rule 12.C.1.5, and would seek such an activity be restricted discretionary.	
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Opposes rule as currently written and seeks clarity of activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 cannot be met.	<ul style="list-style-type: none"> • Not clear what criteria will be used to decide eligibility under this rule. • Unclear what activity status is for post 31 March 2012 discharges which don't meet limits. • Concerns raised elsewhere about Schedule 16 need to be addressed.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Seeks the inclusion of section 15.5 in the Water Plan.	<ul style="list-style-type: none"> • No explanation or evaluation for adopting this amendment in S 32 Report. • Deleting methods is inappropriate and doesn't send clear message to users that best practice is promoted and rewarded.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality ', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> • Criteria are inadequate and needs further consideration.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality ', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> • Criteria are overly simple, unlikely to be useful and need further consideration. • Many rivers unlikely to achieve some characteristics even in their natural state. • Statement 'water is colour-free' is incorrect.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	<p>Opposes the limits included in Schedule 16 and seeks consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water in order to address the concerns raised.</p> <p>Consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water.</p>	<ul style="list-style-type: none"> • Source of limits is unclear. • One set of limits for a diversity of catchments is not appropriate. • Nutrient discharge limits is unlikely to be practical for diffuse discharges. Catchment loading limits more helpful. • Diffuse discharges are diffuse - therefore impractical to take samples at point of discharge. • Limits don't allow for mitigation or avoidance of adverse effects through mixing with receiving waters. • Excessively restrictive and likely to be unachievable for productive farming. • Likely outcome will be unmanageable compliance demands for consents. • Rules are inconsistent with RMA due to lack of allowance for reasonable mixing and proposed method not being effects based.
130	Permitted contaminant discharges	Fertiliser - Glossary definition	Amend	Opposes the current definition of fertiliser and seeks it to be replaced with the following definition (see submission for wording) which is better aligned to the definition used in the regulations of the Agricultural and Veterinary Medicines Act, Code of Practice for the Sale of Fertilisers and Code of Practice for Nutrient Management.	<ul style="list-style-type: none"> • To ensure national consistency in terms and definitions.
203	Simplifying and streamlining	Removal of issues - general requests	Oppose	Seek the inclusion of a commentary on the resource management issues affecting water quality in the region (including those identified	<ul style="list-style-type: none"> • Inclusion of issues and explanations would assist the reader. • Issues should include: effects of non-point source

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				above), and an explanation of how the issues are to be addressed by the objectives and policies.	discharges; management of effects of land use intensification; cumulative effects of discharges; discharge of contaminants to inappropriate receiving environments.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Overall, support the intent of Proposed Plan Change 6A, and in particular the intent to take an "effects-based" approach by permitting discharges that meet specified limits for nitrogen and phosphorus, and not to directly control land uses. Notwithstanding this, has concerns about a number of matters [outlined in submission].	<ul style="list-style-type: none"> Community consultation undertaken by ORC was inadequate. Setting of discharges limits that aren't effects based. Practicalities of sampling. Removal of provision for mixing zones. Activity status for discharges that cannot meet limits. Use of Overseer. Use of prohibited activity status. Adequacy of Section 32 report. Overly simplistic narrative in Schedule 15. Source of discharge limits in Schedule 16, inequitable division into 2 areas. Definition of fertiliser. There was discrepancies in information provided, changes in view, inconsistencies in the N loading limits discussed and what appeared in the plan. Concerned provisions have taken effect from notification date despite uncertainty regarding Schedule 15, Schedule 16, whether permitted activity standards can be met and what activity status is, if permitted can't be met.

249 Sandy Bay Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Define / clarify what is a 'measure'.	<ul style="list-style-type: none"> Will there be disagreements with ORC staff about what is an appropriate measure. Our hill country and rainfall means that even a 10m strip would not prevent some sediment discharge.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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?
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow for situations where it is not feasible to put in a stock crossing and stock movement is needed outside of seasonal muster.	<ul style="list-style-type: none"> If a stream is flowing through paddock (large area) a crossing is not effective without fencing the whole stream. Some areas can be re-fenced to realign them around waterways but isn't possible everywhere. Time and financial budgeting is required to meet rule but isn't allowed as rule has effect now.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Retain methods.	<ul style="list-style-type: none"> Want certainty that ORC will publically continue to provide support. Don't want to have to apply each year through annual plan process for funding.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Remove discharge limits from Schedule 16 until a catchment study and community consultation has been undertaken to determine realistic, appropriate, achievable limits for the different catchments.	<ul style="list-style-type: none"> • If it's in water plan then it automatically occurs? • Want to see science data and research behind limits • Will there be individual catchment consultation if don't think the limits are achievable. • What happens if can't meet the limits after doing everything possible?

250 Waihemo Water Catchment Society Inc

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Oppose.	<ul style="list-style-type: none"> • Proposed rates are too low to be practical. • Blanket coverage of region is not possible. • Insufficient time allowed for researching these planned changes and proposals.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Delete.	<ul style="list-style-type: none"> • Impossible to measure and define where contaminants came from. • Insufficient time allowed for researching these planned changes and proposals.

251 Meridian Energy Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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".
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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".
91	Discharge rules	Section 12.C - Other discharges	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Oppose	Provide for small scale or minor operational discharges appropriately. 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.	<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"

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					information and scientific and socio-economic knowledge" (NPSFW) and be consistent with RMA Part 2.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	<p>Clarify the meaning of "short-term activity" and ensure that discharges associated with construction activities are captured by its meaning.</p> <p>Clarify the meaning of "short-term adverse effect", and ensure that effects during construction and rehabilitating periods are captured by the meaning.</p>	<ul style="list-style-type: none"> No definition or guidance re what is a short term activity or adverse effect No explanation about how rule sits with surrounding structure. No explanation whether rule is stand alone or whether permitteds or prohibitions need to be considered first.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Opposes the characteristics that seek: "Water is clear"; "water is colour-free"; and "riffles and runs free of obvious mud and silt deposits".	<ul style="list-style-type: none"> Characteristics are arbitrary and idealistic. Do not provide for natural spatial and temporal variability. Not conceivable for all water bodies to achieve these characteristics. Characteristics may infer that no further discharges are able to occur in many catchments.
127	Defining good water quality	Table 15.2 - Receiving water standards	Oppose	Opposes Table 15.2.	<ul style="list-style-type: none"> Concerned compliance with schedule would require detailed catchment-wide assessment of water quality which would be arduous and potentially costly process. Inefficient to require such a process.
131	Other matters	Minor and consequential changes	Amend	Any similar or consequential amendments to the Plan Change necessary to give effect to the submission.	<ul style="list-style-type: none"> To give effect to the submission.
202	General opposition	Whole plan change (general opposition)	Amend	<p>Should amendments not be made in accordance with submission that the Plan Change be withdrawn.</p> <p>Undertake a robust S 32 analysis, including scientific and economic assessments, of the proposed permitted activity rules and subsequently amend them so that they are measurable and enforceable.</p>	<ul style="list-style-type: none"> Report is high level Doesn't provide robust assessment of standards Doesn't give due regard to the sustainable management purpose of the RMA.
209	Discharge rules	Chapter 12 - general requests	Amend	<p>Clarify the rules structure, in particular in relation to proposed Restricted Discretionary Rule 12.C.2.1- ensure that this is the only trigger in regard to construction related discharges.</p> <p>Amend proposed permitted activity rules so they are measurable and enforceable.</p>	<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. Undertake a robust section 32 analysis, including scientific and economic assessments.
227	Prohibitions	Prohibitions - general requests	Oppose	Withdraw the proposed prohibited activity rules from the Plan Change, or rework them and amend the activity status.	<ul style="list-style-type: none"> Inconsistent with RMA Ss 5(2), 107(1) and (2). Prevent discharge permits that meet S 107(2) from being granted. Set idealistic water quality outcomes, without providing for community social and economic wellbeing to be

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					considered, evaluated and appropriately determined.

252 New Zealand Fertiliser Manufacturers Research Association Inc

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Support	Supports in principle the intent of Objectives 7.A.2, is 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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	Supports in principle the intent of Objectives 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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Subject to addressing concerns raised below regarding the values listed in Schedule 15, opposes Policy 7.B.1(a). 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." Supports in principle Policy 7.B.1(b) and (c).	<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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Supports the intent of Policy 7.B.4 as it is currently written.	<ul style="list-style-type: none"> • Policy is overall enabling and proactive.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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 water body, 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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing	Amend	Clarify activity status for circumstances where	<ul style="list-style-type: none"> • Currently unclear.

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		discharges		discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Amend	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	• Currently unclear.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	Support intent of rule.	• Standards are considered to be generally pragmatic and practical.
56.2	Beyond the scope	Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted	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".	• Support intent of the rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	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".	• Support intent of the rule but opposes ambiguousness of (g). • Amendment of rule is needed for clarity.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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".	• Support intent of the rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.	• 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.
68	Human sewage etc	Rule 12.B.4.2 - New discretionary other discharge	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.	• Questions why it should be discretionary considering stormwater discharges not meeting conditions is restricted discretionary.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Amend	Opposes the prohibited activity status included in Rule 12.C.0.1 and seeks the provision of these activities as discretionary activities.	• 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge	Amend	Opposes the prohibited activity status included in	• Prohibitions need to give certainty.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		prohibited		Rule 12.C.0.2 and the provision of these activities as discretionary activities.	<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. • 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) and (ii) control discharges that see slight change in clarity or colour, but have no environmental effects.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Opposes the prohibited activity status included in Rule 12.C.0.4 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. • 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).
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.	<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.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				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.	
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Seeks the retention of the permitted activity status for the discharge of nitrogen to groundwater, [but] opposes a number of matters and wishes to see consequential changes as required to meet the other significant concerns raised above. Seeks clarification of the activity status for a discharge of nitrogen from land to groundwater should it not comply with Rule 12.C.1.3, and would seek such an activity be restricted discretionary. Seeks the opportunity to work with Otago Regional Council to resolve the consequential changes required.	<ul style="list-style-type: none"> • 'One size fits all' approach inappropriate. • Not convinced limits supported by relevant and robust science. • 10kg limit appears unachievable by a range of activities. • Not clear what activity status will be for activities that don't achieve limits. • Practicality of demonstrating compliance with limits needs to be questioned. It is not clear what is required. • It is not appropriate to identify a particular version of Overseer in provisions. By 2019 Overseer 6 may have been superseded and may not be appropriate to use anymore. • Rule does not stipulate ORC staff will be certified in use of OVERSEER. Risk of uncertainty • If consents aren't to be granted then need an approach that safeguards the equity of existing user's investments in existing farm systems. • Inadequate Section 32. Does not evaluate potential impact of farm systems, costs of operation and productivity potential. Indicates unbalanced Section 32 has been undertaken.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Oppose	Seeks clarification of the activity status for a discharge of contaminants from any animal waste system to land should it not comply with Rule 12.C.1.4, and would seek such an activity to be restricted discretionary.	<ul style="list-style-type: none"> • Unclear what the activity status becomes if rule isn't complied with. • Appears to default to prohibition which is opposed.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Supports in principle the permitted activity rule, [but] seeks amendment to Rule 12.C.1.5 to read as follows or similar: "The discharge of water (including groundwater) to water (including surface water), or water to a Regionally Significant Wetland, " "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland, resulting from the activity the subject of this rule". Seeks issues relating to Schedule 16 addressed, and clarification of the activity status for a discharge of water (including groundwater) to water (including surface water) should it not comply with Rule 12.C.1.5, and would seek such an activity be restricted discretionary.	<ul style="list-style-type: none"> • Clarification as to whether the term 'water to water' includes groundwater to surface water. • Concern about the inability of existing and future farming operations to meet these limits. • Condition (a) is ambiguous. • Section 12.C applies to any discharge not specifically provided for in sections 12.A or 12.B, and therefore a discharge of contaminants from any animal waste system to land would be prohibited by default.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Opposes the rule as currently written and seeks clarity of activity status for circumstances where discharge first occurs after 31 March 2012 and	<ul style="list-style-type: none"> • Not clear what criteria will be used to decide eligibility under this rule. • Unclear what activity status is for post 31 March 2012

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				limits in Schedule 16 cannot be met.	discharges which don't meet limits. • Concerns raised elsewhere about Schedule 16 need to be addressed.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Seeks the inclusion of section 15.5 in the Water Plan.	• No explanation or evaluation for adopting this amendment in the Section 32 Report. • Deleting methods is inappropriate and doesn't send clear message to users that best practice is promoted and rewarded.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	• Criteria are inadequate and needs further consideration.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	• Criteria are overly simple, unlikely to be useful and need further consideration. • Many rivers will be unlikely to achieve this even in their natural state. • Statement 'water is colour-free' is incorrect.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Opposes the limits included in Schedule 16 and seeks consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water in order to address the concerns raised. Consideration of an alternative approach that involves setting catchment-wide loading limits link to the assimilative capacity of water.	• Source of limits is unclear. • One set of limits for a diversity of catchments is not appropriate. • Nutrient discharge limits is unlikely to be practical for diffuse discharges. Catchment loading limits more helpful. • Diffuse discharges are diffuse - therefore impractical to take samples at point of discharge. • Limits don't allow for mitigation or avoidance of adverse effects through mixing with receiving waters. • Excessively restrictive and likely to be unachievable for productive farming. • Likely outcome will be unmanageable compliance demands for consents. • Rules are inconsistent with RMA due to lack of allowance for reasonable mixing and proposed method not being effects based.
130	Permitted contaminant discharges	Fertiliser - Glossary definition	Amend	Opposes the current definition of fertiliser and seeks it to be replaced with the following definition (see submission for wording) which is better aligned to the definition used in the regulations of the Agricultural and Veterinary Medicines Act, Code of Practice for the Sale of Fertilisers and Code of Practice for Nutrient Management.	• To ensure national consistency in terms and definitions.
203	Simplifying and streamlining	Removal of issues - general requests	Oppose	Seek the inclusion of a commentary on the resource management issues affecting water quality in the region (including those identified above), and an explanation of how the issues are to be addressed by the objectives and policies.	• Inclusion of issues and explanations would assist the reader. • Issues should include: effects of non-point source discharges; management of effects of land use intensification; cumulative effects of discharges; discharge of contaminants to inappropriate receiving environments.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Overall, support the intent of Proposed Plan Change 6A, and in particular the intent to take an "effects-based" approach by permitting discharges that meet specified limits for nitrogen and phosphorus, and not to directly control land uses. Notwithstanding this, has concerns about a number	• Community consultation undertaken by ORC was inadequate. • Setting of discharges limits that aren't effects based. • Practicalities of sampling. • Removal of provision for mixing zones. • Activity status for discharges that cannot meet limits.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				of matters [outlined in submission].	<ul style="list-style-type: none"> • Use of Overseer. • Use of prohibited activity status. • Adequacy of Section 32 report. • Overly simplistic narrative in Schedule 15. • Source of discharge limits in Schedule 16, inequitable division into 2 areas. • Definition of fertiliser. • There was discrepancies in information provided, changes in view, inconsistencies in the N loading limits discussed and what appeared in the plan. • Concerned provisions have taken effect from notification date despite uncertainty regarding Schedule 15, Schedule 16, whether permitted activity standards can be met and what activity status is, if permitted can't be met.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Amend	Stream maintenance / bank stabilisation to maintain water courses be permissible without cost and red tape.	<ul style="list-style-type: none"> • Stream works needs to be allowed with no red tape and consent costs.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Did not specify	An approved style of ware be permissible to drive low cost pumps but also allowing water wildlife to move safely up a bypass and that this be available without consent cost.	<ul style="list-style-type: none"> • Restricting stock access to water means stock water supply scheme is needed. • To set up scheme we need ability to construct wares or water races to drive water rams etc while not restricting access for aquatic life. • Need to be able to be able to meet Rule 13.5.1.8A as easily as possible with no red tape or consent expense.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Clarify what 'season muster' means e.g. Quarterly.	<ul style="list-style-type: none"> • Currently mitigate through use of crossings where possible but difficult to fence due to flooding.

254 John Lee & Dennis Pezaro

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
91	Discharge rules	Section 12.C - Other discharges	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.
127	Defining good water quality	Table 15.2 - Receiving water standards	Did not specify	It is disingenuous for ORC to give deadline dates for some waterways to achieve ORC's acceptable standard for good quality water.	<ul style="list-style-type: none"> • Particular waterways already meet ORC's standards. • Different groupings a reflection that ORC accepts a higher level of pollution in some rivers. • No mention that this appears to confirm appropriate and environmentally sensitive farming practices by members of the Cardrona Landcare group. • Evidenced by Cardrona River.
208	Policy framework	Chapter 7 - general requests	Amend	Some important concepts remain ambiguous. Examples include; "Good quality water", "Natural and Human use values" and "Contaminants".	<ul style="list-style-type: none"> • Concepts are ambiguous with no glossary definition. • Ambiguous if "contaminants" includes chemicals not mentioned in rule 12.C.0.1.
224	Alternative approaches	Fencing	Not Applicable	Farmers with beef herd should fence waterways where cattle are grazed, to protected water quality.	<ul style="list-style-type: none"> • Beef have potential to damage banks and contaminate water. • Limited fencing could be used to restrict cattle access to pugging prone ground.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
248	Other matters	Supports another submission	Not Applicable	No decision requested.	<ul style="list-style-type: none"> • Are members of the Cardrona Landcare group. • Strongly support the submission of the Cardrona Landcare group [submitter number 286].

255 Queenstown Lakes District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	Retain Policy 7.B.2.	<ul style="list-style-type: none"> • Support changes.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend the provisions to clarify whether resource consent is required if the nitrogen tests in Rule 12.C.1.3 are failed or if what is proposed is prohibited. If discretionary consent is required, it should clearly be stated what matters for discretion would be.	<ul style="list-style-type: none"> • Clarification.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend the matters of discretion listed under Rule 12.C.2.1 to recognise that discharge to land that exceeds limits could be a better alternative than a discharge to water.	<ul style="list-style-type: none"> • May prove to be better and workable solution.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Amend Rule to provide greater direction with regard to the use of appropriate control methods to avoid livestock disturbance of the beds of water bodies.	<ul style="list-style-type: none"> • Riparian strips would be vulnerable. • Need to be more proactive.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Amend Rule to provide greater direction with regard to the use of appropriate control methods to avoid	<ul style="list-style-type: none"> • Riparian strips would be vulnerable. • Need to be more proactive.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				livestock disturbance of the beds of water bodies.	
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedule 15 to better reflect the differing receiving environments and the issues they face. Assessment of Schedule 15 matters should take reasonable mixing into consideration.	<ul style="list-style-type: none"> • More targeted and accurate standards need to be set. • What point in water body does an assessment of Schedule 15 take place. • Policy 7.D.1 indicates no mixing and limits applied at point of discharge.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Amend Schedule 16 to better reflect the differing receiving environments and the issues they face. Allowance for appropriate mixing zones should be included.	<ul style="list-style-type: none"> • Standards don't reflect variations between water bodies, or high quality of receiving environment e.g. E coli. • Could result in reduction of water quality. • Standards and timeframes should reflect maintenance and upgrading of water treatment plants. • More targeted and accurate standards should be set.
202	General opposition	Whole plan change (general opposition)	Oppose	Withdraw Plan Change 6a, or Amend as per submission points.	<ul style="list-style-type: none"> • Potentially enable deterioration of Queenstown Lakes district water quality. • Unduly restrict management of water treatment facilities.
211	Implementation	Compliance, enforcement, education	Not Applicable	Provide assurance that effective and regular monitoring is undertaken. Provide clear and consistent guidance and support for landowners to ensure delivery.	<ul style="list-style-type: none"> • Could result in ORC responding after problem. • Doesn't prevent in the first instance. • Process overly complex for landholders to operate. • Potentially increase liability to prosecution.
245	Other matters	Future plan changes	Not Applicable	Amend Plan Change 6A and its associated plans to clarify that the proposed provisions and standards do not apply to the urban parts of the district.	<ul style="list-style-type: none"> • Inappropriate to adopt approach to wastewater/stormwater for urban areas.

256 Rayonier New Zealand Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					Horizons One Plan rules.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Review and amend the rule in consultation with the plantation forestry sector to address the concerns addressed or delete this rule.	<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: <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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Retain current wording.	<ul style="list-style-type: none"> • Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Delete Rule 13.2.1.7 (f) from PC6A or, align with the bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> • The bridge section of the manual gives specific guidance on bridge installation to allow both flood flows and floating logs without hitting the structure.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend rule to address the concern [given in the reasons].	<ul style="list-style-type: none"> • Overly stringent for forestry operations. • Rule does not allow for culverts. • If rule enacted could curtail half of future culvert installations. • In certain catchments it is desirable to impede fish passage (protection of native fish).
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Oppose	Delete the word "maintenance" from Rule 13.3.	<ul style="list-style-type: none"> • Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'. • Maintenance should be permitted activity.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend the Rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • Reduction to 100 m is not achievable or realistic.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend the Rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • Reduction to 100 m is not achievable or realistic.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend the Rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • Reduction to 100 m is not achievable or realistic.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amendment to Schedule 15 as may be required to support relief requested for policies and rules in Chapter 12.	<ul style="list-style-type: none"> • Recognise importance. • Opposes stringent restriction in relation to turbidity units for permitted activities.
131	Other matters	Minor and consequential changes	Did not specify	Seek such consequential or other relief as may be	<ul style="list-style-type: none"> • As discussed in other submission points.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				required to give effect to the submissions discussed.	
202	General opposition	Whole plan change (general opposition)	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> • Supports intent to address declining water quality. • Doesn't practically allow for primary production operations, such as forestry, to continue operations if permitted rules not met. • If not permitted become prohibited, even if all practicable measures have been taken to mitigate, remedy or avoid effects. • Undertake their operation in accordance with Environmental Code of Practice for Plantation Forestry 2007 (awarded Best Planning Document of the Year by the Resource Management Law Association in 2009). • NZ Forest Owners Association forest road engineering manual due for release in July 2012. Contains best practice and guidance on erosion and sediment control. • Maintains their own Environmental Management System. • Without substantial modification, the forestry industry will be required to comply with unrealistic standards, that are not achievable even in undeveloped, pristine catchments.³
208	Policy framework	Chapter 7 - general requests	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.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain the current approach and incorporate changes to address issues identified.	<ul style="list-style-type: none"> • Support efforts to address contaminants in runoff, drainage and leaching. • Support approach to effects-based management instead of controlling land use activities.
227	Prohibitions	Prohibitions - general requests	Oppose	Remove prohibited activity status from the rules in PPC6A and replace it with controlled activity standard.	<ul style="list-style-type: none"> • RMA enables people to undertake sustainable activities. • If forestry cannot meet permitted then likely to be prohibited. • If forestry cannot meet permitted then likely to be prohibited. • Plan change prevents resource consent application. • Prohibited status only used when effects cannot be avoided, remedied or mitigated. • Insufficient justification to use prohibited status and inconsistent with case law. • Out of proportion to potential adverse effects. • Fails to account beneficial environmental effects. • Initiate private plan changes. • Significant departure from approaches used elsewhere.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission. Insert a controlled activity standard for activities that are non-compliant with Rule 12.C.1.1.	<ul style="list-style-type: none"> • Appears rules designed for intensification of pastoral farming. • Insufficient consideration given to impact on forestry. • Fails to provide default standard in event of non-compliance. • A default of controlled activity should be included. • Prohibition inappropriate default. • Activity non-compliant with rule but compliant with prohibition will be an "innominate activity". • Creates uncertainty. • If permitted under district plan then needs certainty for

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					investors that it can be harvested.

257 Waitaki Irrigators Collective Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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?
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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 "noticeability".
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	Amend	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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?
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	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.	<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.

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				<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>	
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Clarification of the activity status of discharges which do not meet the limits provided in the rule.</p> <p>ORC undertake a review of discharge limits and whether these are appropriate/achievable/desirable at the sub-regional level. This could be done through the pilot studies and programmes proposed in the LTP.</p> <p>Amend wording from "OVERSEER version 6.0" to "the latest publically available version of OVERSEER".</p>	<ul style="list-style-type: none"> • Lacks clarity around ability to get resource consent. • Limits are not required for all areas. • Border-dyke irrigation will unlikely to ever meet limits. • Significant costs associated with converting to spray irrigation. • Spray irrigation could lead to higher stocking rates and higher nutrient levels. • Loss of recharge to aquifers from change in irrigation practice. • All consequences of this rule need consideration. • Version 6 not currently available. • OVERSEER will be updated when rule comes into effect.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Remove Rule 12.C.1.5 or provide a clearer definition of the term "water".	<ul style="list-style-type: none"> • Farmer could be prosecuted if discharges exceed limits that enter puddles, created wetlands or confined water. • Unfairness in interpretations and enforcement.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Concerned with the deletion of 15.5.	<ul style="list-style-type: none"> • Important that ORC continues to partner with industry and consent holders in development of codes of practice, standards and environmental management systems and reinforce their uptake through policy framework. • Methods an effective tool for achieving freshwater objectives. • ORC previously advocated and successfully implemented GMP/ASM approach.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should be set after further community consultation, potentially as part of the catchment programmes and studies to be implemented as per the draft LTP.</p> <p>The timeframes for achieving the limits in the Schedule should therefore be adjusted to allow for sufficient lead-in time once more appropriate limits have been set.</p>	<ul style="list-style-type: none"> • ORC requested feedback if water body accrual type but unclear if feedback was taken into account. • Unclear if accrual method was even used to determine discharge limit areas. • Objectives and limits should be determined at sub-regional level following catchment studies/programmes in draft LTP. • Need to clarify whether catchments which discharge into another water body are included e.g. discharge into Waitaki. • Informed limits and rules developed would be sound and achievable. • Community would be better informed to make decisions following catchment by catchment programmes (as set in LTP).
202	General opposition	Whole plan change (general opposition)	Amend	<p>Urge the Council to review the entire Plan and reconsider the process by which the objectives are determined and limits set, as well as the rules which will determine how monitoring and compliance are undertaken.</p> <p>Environmental outcomes should be balanced with the economic, cultural and social consequences of</p>	<ul style="list-style-type: none"> • Support philosophical approach (permitted activity, level of flexibility) but plan has many aspects which are of concern. • Doesn't reflect local values - Strategy allows for sub-regional differences. • Impact on productivity. • NPS states limits should be informed by the best available information and scientific and socio-economic

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				achieving these outcomes.	<p>knowledge.</p> <ul style="list-style-type: none"> • Policies and rules seek to improve quality of all freshwater bodies. Is it necessary for such strict limits when regional water quality mainly good. • Region may not benefit from irrigation fund if reducing stocking rates required to meet discharge limits. • Changes required to meet discharge limits very expensive. • Affected stakeholders informed robust consultation would be undertaken, did not occur.
208	Policy framework	Chapter 7 - general requests	Amend	<p>Include policies and objectives which encourage community-level approaches to managing the effects of activities on water quality.</p> <p>The policies and rules as developed do not make any allowances for the assimilative capacity or mixing zones as a method for enabling good water quality outcomes are met. If the approach which the Council is proposing truly is "effects-based" then allowing for attenuation or mixing zones in order to reduce the negative effects of land-use on water quality would surely meet this objective.</p>	<ul style="list-style-type: none"> • Unclear how community recognition and management of the effect of activities on water quality will be achieved. • Rules are focused on individual level not community. • Few incentives and some disincentives for catchment level mitigation. • Contrary to the RMA, S 70. • Questionable whether there needs to be an improvement in water quality where it is already good.
209	Discharge rules	Chapter 12 - general requests	Amend	<p>Insertion of a clause to recognise that there can be movement of water across properties or that some water bodies can be ephemeral in nature and pick up contaminants from multiple properties before "discharging".</p> <p>Insertion of a rule that would allow the capture and re-use of irrigation run-off as a permitted activity.</p> <p>The policies and rules as developed do not make any allowances for the assimilative capacity or mixing zones as a method for enabling good water quality outcomes are met. If the approach which the Council is proposing truly is "effects-based" then allowing for attenuation or mixing zones in order to reduce the negative effects of land-use on water quality would surely meet this objective.</p>	<ul style="list-style-type: none"> • No protection for landholders where water enters their land in a degraded state. • WIC were advised farmers would be protected from this. • Is another option to help improve water quality and water-use efficiency. • Current rules make this costly process. • Contrary to the RMA, S 70. • Questionable whether there needs to be an improvement in water quality where it is already good.
211	Implementation	Compliance, enforcement, education	Not Applicable	<p>Rules should not be open to different interpretations depending on the ORC representative one is dealing with 'on the day'.</p>	<ul style="list-style-type: none"> • Concerned how rules will be enforced on the ground. • Rules lack definition leaving landholders in positions of uncertainty in cases of compliance monitoring. • Different ORC officers have different understandings on how to interpret, implement, and enforce rules and policies.
243	Bed disturbance	Chapter 13 - general requests	Support	<p>Supportive of the changes that the Council have suggested in order to make the erection of bridges simpler and less costly for land holders.</p>	<ul style="list-style-type: none"> • No reason given.

258 LAC Property Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	That the present draft of PC6A be rejected or withdrawn.	<ul style="list-style-type: none"> • Plan change is inconsistent with RMA, NPSFW, and RPS, and contrary to sound resource management

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					<p>practice.</p> <ul style="list-style-type: none"> • Matters other than water quality not considered - e.g. economic and social wellbeing. • Objectives do not address all values water has (outlined in NPSFW). • Removal of "offensive, objectionable or conspicuous odours" inconsistent with RMA, inappropriately broadens rules. • Rules are not clear or certain, ascertaining compliance is impossible, uncertain rules are unlawful. • Rules do not provide for emergencies, exceptional circumstances, temporary discharges or discharges associated with maintenance work - inconsistent with s 107 of the RMA. • Section 32 Report fails to evaluate objectives, policies and rules as required under the RMA. • Prohibitions inappropriately remove ability for a resource consent to be made, and effects of activity assessed. • Prohibited status not supported by Objectives and Policies, not adequately assessed in Section 32 report.

259 B & J Smith

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Seek modification of this rule.</p> <p>Further practical, analytical work is required to be undertaken, not simply generic modelling.</p>	<ul style="list-style-type: none"> • Need to have levels that will allow farm productivity as well as minimising detrimental effects - practical, analytical work is required, not simply generic modelling. • Best practice scenarios for farmers to follow are essential. • Social and economic implications need evaluation - will have an extremely serious detrimental effect on Otago, and even the NZ GDP status.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	<p>Seek deletion of this rule until which time that extensive practical monitoring has taken place over a longer period of time.</p> <p>Work needs to be facilitated by a neutral third party and be intensively peer-reviewed, in order for Council to make a sound and reasoned judgement on it.</p> <p>Seasonal and annual variations need to be taken into account, especially in those areas that experience vast variations in rainfall and climatic conditions within any given season.</p>	<ul style="list-style-type: none"> • Overriding, generic and impracticable nature of rule. • Absence of practical monitoring, peer reviewed, and scientifically sound reasoning.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	<p>Full support of improving on-farm management practices including stock restriction to waterways, the reduction of sediment in waterways and a heightened level of good on-farm management practices in regards to proactive nutrient management techniques and individual case-by-case monitoring.</p>	<ul style="list-style-type: none"> • No reason given.

260 North Otago Irrigation Company

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	Support	Supports Objectives.	• No reason given.
18	Managing effects of land use on water quality	Section 7.B - Policies general	Support	Supports 7B policies.	No reason given.
30	Beyond the scope	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	Not Applicable	Supports 7C policies.	• No reason given.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	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.
91	Discharge rules	Section 12.C - Other discharges	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',	• 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.	• 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	Further information is required as to what constitutes a 'measure'.	• Rules too subjective, literal interpretation - many minor discharges prohibited. • Clearly defined rules needed to give certainty.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	Provide a definition of ponding. For example, "Ponding is liquid that remains on the surface of land for longer than two hours."	• Rules too subjective, literal interpretation - many minor discharges prohibited. • Clearly defined rules needed to give certainty.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	That rule 12.C.1.1 is amended to reflect median environmental conditions and a more achievable level of water clarity. That additional wording is included to ensure farmers are not held accountable for natural events, such as mass movements or in-stream erosion processes. Requests ORC provides a visual aid to help farmers understand what 40 NTU and 5NTU (or any other proposed turbidity limit) looks like.	• 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	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.	• 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	That the proposed limits are reviewed to ensure they are appropriate for each catchment and based	• OVERSEER version 6 not yet released, people can't make informed decision about the impact of the plan

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				<p>on the actual effects of nitrogen leaching.</p> <p>Requests the wording of Rule 12.C.1.3 is amended to reflect that the leaching/concentration values specified should be a property average.</p> <p>That the rule refers to the 'current' version of OVERSEER rather than specifying the version number.</p>	<p>change.</p> <ul style="list-style-type: none"> • OVERSEER is regularly updated, plan change needed to update version number. • OVERSEER established for dairy, but in infancy for other farming systems. • 10 kgN/ha/yr leaching limit very difficult or impossible to meet. • High N levels in groundwater only an issue for drinking water - N sensitive zones should be based on actual risk to drinking water. • Issues with use of OVERSEER in an irrigated environment (e.g. use of average monthly climate data can result in overestimate of N leaching).
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>Requests ORC amend Rule 12.C.1.4 to include as (c) the following wording: ' . . . any collection or storage system is sealed so as to prevent any contamination of water in any water body, drain or water race'.</p>	<ul style="list-style-type: none"> • Sealing essential to be compliant with rules, but may not be obvious to farmers from this rule. • Helpful to include prescriptive rules as bottom line. • Avoids contractors and consultants advising farmers that ponds do not require sealing.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	<p>Remove Rule 12.C.1.5.</p> <p>Clarify if the water in gullies must meet the discharge limits (where it discharges to a receiving water body) or if the discharge limits only apply to discharges to this water.</p>	<ul style="list-style-type: none"> • Difficult to know how and where discharge limits apply where water is discharged to water - would apply where a farm drain or watercourse discharges to a watercourse. • Discharge limits not achievable - even with best practice - will require changes that will severely impact on economic viability of farming (does not meet RMA requirement of balancing economic/social considerations with environmental).
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	<p>Remove 12.C.1.6(e).</p>	<ul style="list-style-type: none"> • How are farmers to manage irrigation run-off without conveying it within a 'water supply transport system' - they must be able to manage irrigation run-off sensibly and responsibly.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	<p>This rule gives a short-term consenting option for the discharge of contaminants to land where applicants have been unable to meet the discharge limits within the timeframe specified. Request that this principle is extended to include restricted discretionary activities for the discharge of contaminants to water and the discharge of water containing contaminants to water.</p> <p>Remove the requirement for a discharge to have first occurred prior to 31 March 2012.</p>	<ul style="list-style-type: none"> • No reason given.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	<p>Supports the changes to Rules 13.2.1.7.</p>	<ul style="list-style-type: none"> • Streamlines the process of installing bridges and crossings.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	<p>Supports the changes to Rules 13.2.1.7B.</p>	<ul style="list-style-type: none"> • Streamlines the process of installing bridges and crossings.
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Support	<p>Supports the removal of the word 'consecutive' from these rules.</p>	<ul style="list-style-type: none"> • No reason given.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	<p>Crucial that these methods continue to be recognised by ORC.</p>	<ul style="list-style-type: none"> • These methods have an important role in addressing water quality issues. • Understand method removed to streamline plan, not because ORC no longer supports use of these methods.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	<p>Amend the Schedules to provide clarity as to which waterways are captured under Schedule 15 and</p>	<ul style="list-style-type: none"> • Supports listed good water characteristics. • Difficult to know how and where discharge limits apply

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				<p>which are off farm discharges which must meet the limits under Schedule 16.</p> <p>Clarify how the rules will be applied where watercourses do not discharge to the coast within Otago's regional boundaries.</p> <p>That Schedule 15 is amended so that:</p> <ul style="list-style-type: none"> • The Waiaireka and Kakanui catchments are treated separately. • The Waiaireka catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments. • The Kakanui catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments. • The Schedule 15 objectives are appropriate for the Waiaireka catchment - the ANZECC guidelines for lowland streams could be an alternative. Note that these are slightly higher than the limits currently proposed. 	<p>where water is discharged to water - would apply where a farm drain or watercourse discharges to a watercourse.</p> <ul style="list-style-type: none"> • Unlisted catchments that do not discharge to the coast are not clearly dealt with in the plan change. • In some catchments different limits are appropriate. Certain hydrogeomorphic processes in the Waireka catchment mean the objectives and discharge limits are not appropriate. • Waireka and Kakanui catchments are different. Both are on boundary between long and short accrual, and were in short accrual group during consultation.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>Amend the Schedules to provide clarity as to which waterways are captured under Schedule 15 and which are off farm discharges which must meet the limits under Schedule 16.</p> <p>Amend timeframes in Schedule 16 to allow the proposed limits regime to be tested.</p> <p>Amend discharge limits in Schedule 16 so they are achievable, and also so that they are appropriately linked to receiving water quality targets. A number of options could be considered to achieve this, such as:</p> <ul style="list-style-type: none"> • Amend discharge limits to reflect MFE SOE reporting approach - e.g. four out of five of the proposed parameters tested must meet the proposed limits. • Increase discharge limits in some catchments or 'zones' only depending on the key characteristics of the catchment or 'zone'. • Increase discharge limits for smaller watercourses only , e.g. first and second order watercourses. • Increase discharge limits across the board to reflect the 'average' assimilative capacity of watercourses. • Ensure limits regime reflects actual contribution of contaminants to a water body. <p>Re-consider the proposed discharge limits to make some allowance for the assimilative capacity of watercourses and recognise the investment that has been made in existing farming operations and the many other important environmental (e.g. weed</p>	<ul style="list-style-type: none"> • Difficult to know how and where discharge limits apply where water is discharged to water - would apply where a farm drain or watercourse discharges to a watercourse. • Discharge limits not achievable - even with best practice - will require changes that will severely impact on economic viability of farming (does not meet RMA requirement of balancing economic/social considerations with environmental). • Submitter offers to work with ORC on determining achievability of limits, and any changes needed - likely longer transition times would be needed. • Higher discharge limits could achieve water quality objectives without such an impact on farming. • No direct link between discharge contaminant levels and receiving water quality; assimilative capacity of watercourses not taken into account (recognised in RMA). • Low volume discharges of high contaminant concentration will have no impact on receiving water body quality. • Unlisted catchments that do not discharge to the coast are not clearly dealt with in the plan change. • In some catchments different limits are appropriate. Certain hydrogeomorphic processes in the Waireka catchment mean the objectives and discharge limits are not appropriate. • Waireka and Kakanui catchments are different. Both are on boundary between long and short accrual, and were in short accrual group during consultation.

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				<p>control, pest control) and social services these businesses provide.</p> <p>Clarify how the rules will be applied where watercourses do not discharge to the coast within Otago's regional boundaries.</p> <p>That Schedule 16 is amended so that:</p> <ul style="list-style-type: none"> • The Waiareka and Kakanui catchments are treated separately. • The Waiareka catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments. • The Kakanui catchment is moved to Receiving Water Group 1 and the Area 1 for short accrual catchments. • The Schedule 16 discharge limits are appropriately linked to receiving water quality and are set at a level that is achievable for farmers 	
131	Other matters	Minor and consequential changes	Amend	Further requests such other deletions amendments or changes as may be needed to give full effect to this submission and the issues raised.	• As discussed in other submission points.
211	Implementation	Compliance, enforcement, education	Not Applicable	<p>Provide further information on ORC's compliance strategy.</p> <p>Recognise in ORC's compliance strategy that if farmers implement good environmental practices then they are taking appropriate steps towards achieving discharge limits and will not be subject to compliance action, at least in the short term.</p> <p>Provide a summary of "good environmental practice" for various farming operations to farmers as a middle ground between an effects-based approach and activity-based requirements.</p> <p>Further develop the definition of watercourse and/or provide some clear examples to help farmers and council compliance officers understand what is and isn't a watercourse.</p>	<ul style="list-style-type: none"> • Current approach has significant uncertainty and risk for farmers if don't know how to avoid prosecution. • Approach has significant uncertainty and risk for farmers if don't know how to avoid prosecution. • Definition of watercourse in RMA and regional plan is confusing (e.g. what is "intermittently flowing"? What is the difference between a farm drain and a modified watercourse. • Clarification will help decision making on whether consent needed.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support maintaining and improving water quality, and the effects-based approach.	• Policies and rules should be achievable, clear, and not compromise the economics of farming.
227	Prohibitions	Prohibitions - general requests	Amend	<p>Prohibited activities needs to be clearly defined to give land users certainty as to what is and what is not prohibited.</p> <p>These activities should generally be non-complying activity rather than prohibited.</p>	• Rules too subjective, literal interpretation - many minor discharges prohibited.
237	Alternative approaches	Dams for collection and treatment	Not Applicable	That ORC review its position on capture dams during this plan change process, so that where appropriate, farmers are able to manage their run-off in this way	<ul style="list-style-type: none"> • Collection and re-use of irrigation run off through capture dams key mechanism to prevent transfer of nutrients. • Regulatory regime prevents this in the Waiareka catchment. • Without capture dams irrigation run off can cross to

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					dryland neighbouring properties - will create tension as neighbours will need to take measures to ensure contaminant levels are not increased.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Amend	That it is recognised within the plan that existing discharge consents will not be reviewed to the proposed discharge limits.	• Hold a number of existing consents for discharge of pipeline scour water.
244	Alternative approaches	Other approaches	Not Applicable	Streamline the current consenting process required to undertake works to construct wetlands for the purposes of improving water quality. That ORC provide some form of subsidy of financial support to assist farmers undertaking projects to enhance water quality, including riparian fencing and planting. These subsidies could include an incentive to move quickly, e.g. a five year time limit.	• Many farmers would be interested in constructing wetlands - long costly consent process puts them off. • Significant work needed by farmers to meet water quality objectives. • Other regional councils provide subsidies with good outcomes.

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100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Increase discharge limit to 50kgN/ha under efficient flood irrigation systems.	• 30 kg N/ha limit will preclude flood irrigation, especially on alluvial soils (which enables high production pastoralism). • What are the adverse effects of increasing the discharge limit - in the Waitaki Plains receiving water is large and flows out to sea.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Support the concept but reduce the discharge limits to more manageable levels.	• In consultation ORC related limits to average catchment discharge levels. • More details on numbers of current exceedences needed to determine if limits are manageable.

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15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.	• 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Support	Supports in principle the intent of Objective 7.A.2, [but] subject to concerns regarding better defining the values in Schedule 15.	• 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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	Supports in principle the intent of Objective 7.A.3, subject to concerns regarding better defining the values in Schedule 15.	• 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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Subject to addressing concerns raised below regarding the values listed in Schedule 15, opposes Policy 7.B.1(a). Seeks Policy 7.B.1(a) to be amended to read as	• 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

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				follows or similar: "(a) Avoiding, remedying or mitigating, discharges of contaminants on natural and human use values." Supports in principle Policy 7.B.1(b) and (c).	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Supports the intent of Policy 7.B.4 as it is currently written.	• Policy is overall enabling and proactive.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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).	• 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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	• Currently unclear.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Amend	Clarify activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 can not be meet.	• Currently unclear.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	Support intent of rule.	• Standards are considered to be generally pragmatic and practical.
56.2	Beyond the scope	Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted	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".	• Support intent of the rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	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".	• Support intent of the rule but opposes ambiguousness of (g). • Amendment of rule is needed for clarity.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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".	• Support intent of the rule but opposes ambiguousness of (e). • Amendment of rule is needed for clarity.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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	• Support intent of the rule but opposes ambiguousness of (c). • Amendment of rule is needed for clarity.

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				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"> • 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.
68	Human sewage etc	Rule 12.B.4.2 - New discretionary other discharge	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 report unbalanced. • Matters prohibited in rules are very general. Questionable as to if it is appropriate to prohibit.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	Amend	Opposes the prohibited activity status included in Rule 12.C.0.2 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 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.

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					<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 section 67(1)(c).
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Opposes the prohibited activity status included in Rule 12.C.0.5 and seeks the provision of these activities as discretionary activities.</p>	<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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Seeks the retention of the permitted activity status for the discharge of nitrogen to groundwater, [but] opposes a number of matters and wishes to see consequential changes as required to meet the other significant concerns raised above.</p> <p>Seeks clarification of the activity status for a discharge of nitrogen from land to groundwater should it not comply with Rule 12.C.1.3, and would seek such an activity be restricted discretionary.</p> <p>Seeks the opportunity to work with ORC to resolve the consequential changes required.</p>	<ul style="list-style-type: none"> • 'One size fits all' approach inappropriate. • Not convinced limits supported by relevant and robust science. • 10kg limit appears unachievable by a range of activities. • Not clear what activity status will be for activities that don't achieve limits. • Practicality of demonstrating compliance with limits needs to be questioned. It is not clear what is required. • It is not appropriate to identify a particular version of Overseer in provisions. By 2019 Overseer 6 may have been superseded and may not be appropriate to use anymore. • Rule does not stipulate ORC staff will be certified in use of OVERSEER. Risk of uncertainty • If consents aren't to be granted then need an approach that safeguards the equity of existing user's investments in existing farm systems. • Inadequate Section 32. Does not evaluate potential impact of farm systems, costs of operation and productivity potential. Indicates unbalanced Section 32 has been undertaken.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste	Amend	Seeks clarification of the activity status for a	<ul style="list-style-type: none"> • Unclear what the activity status becomes if rule isn't

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		permitted		discharge of contaminants from any animal waste system to land should it not comply with Rule 12.C.1.4, and would seek such an activity to be restricted discretionary.	<ul style="list-style-type: none"> complied with. • Appears to default to prohibition which is opposed.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	<p>Supports in principle the permitted activity rule, [but] seeks amendment to Rule 12.C.1.5 to read as follows or similar:</p> <p>"The discharge of water (including groundwater) to water (including surface water), or water to a Regionally Significant Wetland, "</p> <p>"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>Seeks issues relating to Schedule 16 addressed, and clarification of the activity status for a discharge of water (including groundwater) to water (including surface water) should it not comply with Rule 12.C.1.5, and would seek such an activity be restricted discretionary.</p>	<ul style="list-style-type: none"> • Clarification as to whether the term 'water to water' includes groundwater to surface water. • Concern about the inability of existing and future farming operations to meet limits. • Condition (a) is ambiguous. • Section 12.C applies to any discharge not specifically provided for in sections 12.A or 12.B, therefore a discharge of contaminants from an animal waste system to land would be prohibited by default.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Oppose	Opposes the rule as currently written and seeks clarity of activity status for circumstances where discharge first occurs after 31 March 2012 and limits in Schedule 16 cannot be met.	<ul style="list-style-type: none"> • Not clear what criteria will be used to decide eligibility under this rule. • Unclear what activity status is for post 31 March 2012 discharges which don't meet the limits. • Concerns raised elsewhere about Schedule 16 need to be addressed.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Seek the inclusion of Section 15.5 in the Water Plan.	<ul style="list-style-type: none"> • No explanation or evaluation of adopting this amendment in Section 32 Report. • Deleting methods is inappropriate and doesn't send clear message to users that best practice is promoted and rewarded.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality ', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> • Criteria are inadequate and needs further consideration.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Oppose	Supports in principle the intent of Schedule 15 to define 'good water quality ', [but] opposes the current wording and seeks further work to be undertaken on this matter and amendments to Schedule 15 to address the concerns it has raised.	<ul style="list-style-type: none"> • Criteria are overly simple, unlikely to be useful and need further consideration. • Many rivers unlikely to achieve some characteristics even in their natural state. • Statement 'water is colour-free' is incorrect.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	<p>Opposes the limits included in Schedule 16 and seeks consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water in order to address the concerns raised.</p> <p>Consideration of an alternative approach that involves setting catchment-wide loading limits linked to the assimilative capacity of water.</p>	<ul style="list-style-type: none"> • Source of limits is unclear. • One set of limits for a diversity of catchments is not appropriate. • Nutrient discharge limits is unlikely to be practical for diffuse discharges. Catchment loading limits more helpful. • Diffuse discharges are diffuse - therefore impractical to take samples at point of discharge. • Limits don't allow for mitigation or avoidance of adverse effects through mixing with receiving waters. • Excessively restrictive and likely to be unachievable for

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					<ul style="list-style-type: none"> productive farming. Likely outcome will be unmanageable compliance demands for consents. Rules are inconsistent with the RMA due to lack of allowance for reasonable mixing and the proposed method not being effects based.
130	Permitted contaminant discharges	Fertiliser - Glossary definition	Amend	Opposes the current definition of fertiliser and seeks it to be replaced with the following definition (see submission for wording) which is better aligned to the definition used in the regulations of the Agricultural and Veterinary Medicines Act, Code of Practice for the Sale of Fertilisers and Code of Practice for Nutrient Management.	<ul style="list-style-type: none"> To ensure national consistency in terms and definitions.
203	Simplifying and streamlining	Removal of issues - general requests	Oppose	Seek the inclusion of a commentary on the resource management issues affecting water quality in the region (including those identified above), and an explanation of how the issues are to be addressed by the objectives and policies..	<ul style="list-style-type: none"> Inclusion of issues and explanations would assist the reader. Issues should include: effects of non-point source discharges; management of effects of land use intensification; cumulative effects of discharges; discharge of contaminants to inappropriate receiving environments.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Overall, support the intent of Proposed Plan Change 6A, and in particular the intent to take an "effects-based" approach by permitting discharges that meet specified limits for nitrogen and phosphorus, and not to directly control land uses. Notwithstanding this, has concerns about a number of matters [outlined in submission].	<ul style="list-style-type: none"> Community consultation undertaken by ORC was inadequate. Setting of discharges limits that aren't effects based. Practicalities of sampling. Removal of provision for mixing zones. Activity status for discharges that cannot meet limits. Use of Overseer. Use of prohibited activity status. Adequacy of Section 32 report. Overly simplistic narrative in Schedule 15. Source of discharge limits in Schedule 16, inequitable division into 2 areas. Definition of fertiliser. There was discrepancies in information provided, changes in view, inconsistencies in the N loading limits discussed and what appeared in the plan. Concerned provisions have taken effect from notification date despite uncertainty regarding Schedule 15, Schedule 16, whether permitted activity standards can be met and what activity status is, if permitted can't be met.

263 DF1 Ltd and DF3 Ltd, being partners of the Dairy Farms Partnership

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14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					NPSFW 2030 deadline.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	Amend	Introduce greater flexibility in relation to the timeframes set out in Policies 7.D.1 to 7.D.3.	<ul style="list-style-type: none"> • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	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. <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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend Rule 12.C.1.3 by inserting after 'OVERSEER Version 6.0' in paragraphs (i) and (ii) the words 'or equivalent software regarded as industry best practice'.	<ul style="list-style-type: none"> • Supports 7 year transition time, and 30kg nitrogen limit is appropriate. • Reliance on one brand of software is overly restrictive.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Support	Approve Rule 12.C.1.4 in its present form.	<ul style="list-style-type: none"> • Rule appropriately provides for farming activities, is most appropriate method to achieve objectives and policies, and best meets purpose of the RMA.

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104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend Rule 12.C.2 - Restricted Discretionary activities to provide that the discharge of contaminants listed in Schedule 16 to land where the discharge first occurred prior to 31 March 2012 is a controlled activity that will not be publicly notified. In granting a resource consent for existing discharges, insert the following criteria: Council will restrict the exercise of its control to the following matters: (a) Any adverse effects on water quality, including cumulative effects; (b) How discharge limits in section 16 will be achieved within a set timeframe, including any quality management practices to be implemented; (c) Any adverse effects on any Regionally Significant Wetland or on any regionally significant wetland value; (d) Any adverse erosion, land stability or sedimentation effects or property damage resulting from the discharge; (e) Any financial contribution for any Regionally Significant Wetland or on any regionally significant wetland value; (f) The information and monitoring requirements; (g) The duration of the resource consent; and (h) The review of conditions of the resource consent.	<ul style="list-style-type: none"> The proposed permitted and prohibited activity approach is overly restrictive, and rule is contrary to good resource management practice and the purpose and principles of the RMA. Existing discharges should be given some protection. Meeting discharge limits will require change in practice and increased costs for farmers. Assurance should be given that resource consent will be granted if discharge limits can't be met by required date.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Support	Supports the approach that applications for restricted discretionary and controlled activities would be dealt with on a non-notified basis.	<ul style="list-style-type: none"> No reason given.
111	Bed disturbance - structures and animal waste	Rule 13.3.2.1 - Alteration of a structure restricted discretionary	Support	Supports the approach that applications for restricted discretionary and controlled activities would be dealt with on a non-notified basis.	<ul style="list-style-type: none"> No reason given.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Introduce greater flexibility in relation to the timeframes set out Schedule 15.	<ul style="list-style-type: none"> Need to avoid disproportionate costs on land managers, and to provide flexibility in time in order to give effect to the NPSFW 2030 deadline.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Additional flexibility in timeframes is sought.	<ul style="list-style-type: none"> Individual discharge limits are the most appropriate way to give effect to NPSFW. Transition times are needed.
131	Other matters	Minor and consequential changes	Amend	Such similar or consequential relief necessary to give effect to this submission.	<ul style="list-style-type: none"> As discussed in other submission points.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Regional controls on water quality should be introduced that enable dairy farming without disproportionate costs or inefficiencies.	<ul style="list-style-type: none"> Dairy farming is an existing, permitted land use. Supports flexibility for farmers to make changes in their own way. Proposed effects-based approach accords with RMA and allows consideration of local environmental conditions and economic factors.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Existing use of border dykes (where established prior to 31 March 2012) should have permitted status provided that it is not likely to result in significant adverse environmental effects.	<ul style="list-style-type: none"> The proposed permitted and prohibited activity approach is overly restrictive, contrary to good resource management practice and the purpose and principles of the RMA.
236	Implementation	Transition times	Amend	Any timeframe for implementation should pay due regard to valuable property rights secured to land	<ul style="list-style-type: none"> NPSFW enables policy implementation "as promptly as is reasonable in the circumstances" and requires

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				managers under existing resource consents. A collaborative approach which recognises the role of land managers and farm owners in implementing water quality measures is appropriate.	"progressive implementation". • Reasonable timeframes involves consideration of land management practices, avoiding disproportionate costs, and ensuring sufficient time to change practices.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Amend	Insert new rule: 12.C.3 Discretionary activity: resource consent required and provide for any discharge of contaminants from an animal waste system to saturated land or that results in ponding as a discretionary activity.	• The proposed permitted and prohibited activity approach is overly restrictive, contrary to good resource management practice and the purpose and principles of the RMA.

264 4650 Matarae Station Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
54.2	Beyond the scope	Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, stormwater and other specified contaminants, and discharges from industrial and trade premises	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.
91	Discharge rules	Section 12.C - Other discharges	Amend	Changes to the whole of rule 12.C	• Impossible to pin contamination on one person when it's cumulative effects caused by numerous landholders.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.	• 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.

265 Graeme & Jane Hogg

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Slow down these changes. They must be more flexible. Work in with farmers with options to their particular problems rather than hitting them with a sledge hammer when a tap will do.	• Local environment is not always suitable for culverts. • Changes must be gradual and must take into account other users, e.g. recreational.

266 Clyde Douglas

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	That the leaching limits in the Kakanui catchment are amended to limits to allow water quality objectives to be achieved, but without unduly compromising farming operations. From 10 kg/ha/yr on sensitive zone to 20 kg/ha/yr. That the rule refers to the 'current' version of OVERSEER rather than specifying the version number.	• Very difficult for farmers, even low input farms, to achieve the proposed N limit in the sensitive zones. • By specifying version, it will be out of date by 2019. • OVERSEER 6.0 isn't released yet, so impossible to make informed decision about impact of PC6A.

267 Environmental Defence Society

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1.1	Simplifying and streamlining	Section 7.1 - Introduction	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 rational for approach taken.
2	Simplifying and streamlining	Section 7.2 - Issues in general	Amend	Reinstate the issues relating to water quality, and	• Serves to focus policy and rule framework.

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				amend to be consistent with other changes sought in this submission.	<ul style="list-style-type: none"> Ensures reader has greater understanding of underlying rational for approach taken.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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>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>	<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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	<p>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.</p> <p>Amend Policy so that 'noticeable effects' are specified in more precise detail.</p>	<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.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Amend	<p>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.</p>	<ul style="list-style-type: none"> ORC has function to maintain indigenous biodiversity. Needs to consider related matters when deciding if discharge is appropriate.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	Amend	<p>Amend the policy so that it is clear when the policy applies.</p>	<ul style="list-style-type: none"> Reference to "where they are about to enter water" is unclear. Framework should cover diffuse and point source discharges.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	<p>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.</p>	<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.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants	Amend	<p>To amend the rules so that they are discretionary</p>	<ul style="list-style-type: none"> Matters of discretion fail to list important factors e.g.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		restricted discretionary		activities, and that the consent authority is not precluded from giving public notification of an application for resource consent for such activities.	actual or potential effects on aquatic ecosystems, indigenous species and recreational activities. • Should not be a rule precluding public notification due to public interest in water quality.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Amend	To amend the rules so that they are discretionary activities, and that the consent authority is not precluded from giving public notification of an application for resource consent for such activities.	• Matters of discretion fail to list important factors e.g. actual or potential effects on aquatic ecosystems, indigenous species and recreational activities. • Should not be a rule precluding public notification due to public interest in water quality.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Amend Table 15.1 so that the characteristics of good quality water are also defined in quantitative terms as far as possible.	• "Good water quality" should be specific and measurable as possible so people aware what standard is to be attained. • Using everyday language is useful. However needs to translate to scientific measurements to reduce ambiguity. • As stated for related submission points.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Amend the table to give effect to the other points made in this submission.	• As stated for related submission points.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	To amend the permitted activity discharge limits to ensure that cumulatively they do not give rise to effects outlined in Section 70 of the RMA, and that they maintain or improve water quality.	• Setting catchment load limits is only effective way to manage cumulative effects of multiple discharges. • Permitted activity limits should not exceed catchment limits.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain current approach to control discharges directly. Amend the proposed plan so it gives effect to the New Zealand Coastal Policy Statement, in particular policy 21. Amend the proposed plan so it gives effect to the NPSFW, in particular Objectives A1 and A2.	• Discharge rules addressing point and non-point pollution are necessary under RMA Section 15. • NZCPS requires plans to identify areas of coastal water which have deteriorated. • ORC will need to work 'back up the catchment' in order to improve deteriorated areas of coastal water. • NPS includes requirement to protect outstanding freshwater bodies and the significant values of wetlands.
227	Prohibitions	Prohibitions - general requests	Amend	Amend the rule so it is clearer as to when it applies and what discharges it applies to.	• Rule should be clear and not alleged to be ultra vires. • For example "When the discharge is about to enter water" is ambiguous.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	To amend the permitted activity discharge limits to ensure that cumulatively they do not give rise to effects outlined in Section 70 of the RMA, and that they maintain or improve water quality.	• Setting catchment load limits is only effective way to manage cumulative effects of multiple discharges. • Permitted activity limits should not exceed catchment limits. • Permitted activities cannot result in Section 70 effects.

268 Colin Scurr

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.	• Placing natural and human use values above all others is not consistent with RMA. • Implication is any adverse effects on natural or human use values is unacceptable. • Concept of 'good water quality' applying to entire region is arbitrary. • Does not reflect water quality variations across the region.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	The Objective needs to recognise the variability of water quality and provide for integrated management of resources.	• Concept of 'good water quality' is arbitrary and unclear.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete "To have individuals and communities".	• Purports to transfer responsibilities of regional councils under Section 30 RMA to community.

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					<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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	<p>Amend Policy to reflect terminology of the Act and to address activities that have identifiable effects.</p> <p>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.</p>	<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
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Support.	<ul style="list-style-type: none"> • Methods to provide encouragement should be specified.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	Amend	Remove (excluding in human sewage, hazardous wastes and stormwater, and from industrial and waste premises)	<ul style="list-style-type: none"> • All discharges must be treated the same.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
91	Discharge rules	Section 12.C - Other discharges	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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"> with RMA. Uncertain rules are unlawful. 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	<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"> Rule is impractical and void for uncertainty. Uncertain in terms of steps that need to be taken to 'avoid' sedimentation. No allowance for exceptional circumstances, temporary discharges, and maintenance work. Does not allow for situations where sediment run-off cannot be avoided. Does not allow for case by case assessments. Actual effects can not be assessed and weighed against other relevant factors. Potential to clash with other rules. Objectives and Policies do not provide for prohibited status. Mitigation could mean anything.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste	Amend	Rule be amended as follows:	<ul style="list-style-type: none"> Uncertain and includes double-ups and inconsistencies.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		systems, compost, silage prohibited		<ul style="list-style-type: none"> - 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"> • 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	<p>Clarify the relationship between this rule and rule 12.C.0.5. Amend the timeframe or mechanism to account for catchment dynamics.</p> <p>Delete reference to 'where the discharge is about to enter water' and exchange for 'after reasonable mixing'.</p>	<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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete rule or rule be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p> <p>Change "Overseer version 6" to the most up to date version currently available.</p>	<ul style="list-style-type: none"> • Testing rather than modelling should determine compliance. • Provides no guidance on data that needs to be recorded. • Basis for values is unclear and how they relate to effects on environment. • Limits should be determined taking into account catchment loadings. • Needs to be clear linkage between rule and relevant discharge for rule to be lawful. • Overseer 6 will be obsolete in time.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Support	<p>All the performance standards for discharges from animal waste systems should be included within the same Rule to avoid misunderstanding about what needs to be complied with.</p>	<ul style="list-style-type: none"> • Rule as proposed and its relationship to other rules is confusing.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Amend	<ul style="list-style-type: none"> • Regionally Significant Wetlands need to be carefully managed. • Not clear how limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Amend	<ul style="list-style-type: none"> • Regionally Significant Wetlands need to be carefully managed. • Not clear how limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	<p>Rule be amended or new rule provides for resource consents where (b) cannot be achieved.</p>	<ul style="list-style-type: none"> • Assumes Schedule 16 limits can be met in all cases. • Not clear how applications that cannot meet Schedule 16 limits will be assessed. • Social and economic wellbeing must be considered too.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	<p>Amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying</p>	<ul style="list-style-type: none"> • Bridges are not always practical. • No provision for culverts or pipe bridges.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				capacity of the waterway.	
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> • Not clear what a 'crossing' is. • Rule too restrictive and unable to facilitate desired outcome.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbances in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removes qualifier for conspicuous disturbance. This reduces the threshold. • Does not provide for emergency disturbances or disturbances in exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous, and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Term 'seasonal muster' is ambiguous. • Rule does not include qualifiers, which is inconsistent with the RMA and narrows the applicability of the rule. • No environmental basis for removal of qualifiers.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for on a case by case basis.	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Does not provide for emergencies, exceptional circumstances. • No environmental basis for such a broad prohibition. • Does not allow for a case by case assessment of the effects of the discharge. • Objectives and Policies do not provide support for prohibited status.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedule to reflect properly differentiated statistical models for ambient water quality.	<ul style="list-style-type: none"> • Targets expressed as absolute limits. Does not reflect scientific practice for SOE monitoring. • Does not reflect natural variation across a river. • Establishes unnecessary restrictive regime. • Absolute targets in Schedule 15 are unlawful as does not have regard to actual or potential effects. • No foundation or support for target dates.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Amend Schedule to reflect properly differentiated statistical models for discharge standards and allowing for reasonable mixing. Add provision to make tests to be an average of 5 samples over a period of 24 hours.	<ul style="list-style-type: none"> • Unclear how limits relate to environmental effects. • Unnecessarily restrictive. • Unlawful to have limits that apply 'prior to the point of discharge'. • Limits should apply after reasonable mixing or be increased to reflect dilution or assimilation capacity. • Unclear why limits selected are necessary to achieve purpose of RMA. • Standards must be practical and achievable. • No regime for circumstances where limits cannot be reached or other effects outweigh actual or potential effects of allowing the discharge. • One sample can be contaminated.
202	General opposition	Whole plan change (general opposition)	Oppose	That where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should be withdrawn.	<ul style="list-style-type: none"> • Water quality objectives are placed above all, fail to address the variety of values outlined in NPSFW. Little scope for considering other matters, e.g. economic and social wellbeing. • Inconsistent with RMA, NPSFW, and RPS. • Does not provide for reasonable mixing or incorporate qualifiers in relation to discharges. • Section 32 fails to adequately evaluate whether objectives, policies and rules are most appropriate, efficient and effective way to achieve purpose of the Act. • Section 32 fails to adequately assess prohibited activity status.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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"> Natural and human use values to be reviewed to ensure all appropriate values are included. Limits set so land use activities likely to be severely constrained so human use values won't be met.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Delete and replace it with Objectives based on the following values <ul style="list-style-type: none"> 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'.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Support	Retain Policy 7.B.3	<ul style="list-style-type: none"> Recognises the assimilative capacity of land.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	Oppose	Delete Policy 7.B.5.	<ul style="list-style-type: none"> More appropriate in chapter on water quantity.
30	Beyond the scope	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	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 the Plan.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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

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					<ul style="list-style-type: none"> 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	<p>Amend Rule 12.B.1.1 to include compliance with NZS8409 qualifications as follows:</p> <p>"The discharge is carried out only by persons holding either:</p> <p>a) a GROWSAFE Registered Chemical Applicators Certificate (National Certificate in Agrichemical Aquatic strand)</p> <p>or</p> <p>GROWSAFE Introductory Certificate and under direct supervision of GROWSAFE Registered Chemical Applicators Certificate (National Certificate in Agrichemical Aquatic strand)</p> <p>(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</p> <p>The discharge shall be undertaken in a manner consistent with NZS8409:2004 Management of Agrichemicals."</p>	<ul style="list-style-type: none"> • Correct name is GROWSAFE Registered Chemical Applicators Certificate. • Applicators should have the agrichemical aquatic strand. • Should include a qualification requirement for aerial operators.
56.2	Beyond the scope	Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted	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: Where the application is undertaken by a contractor for hire and reward the following qualifications must be held:</p> <p>(i) Ground based application</p> <ul style="list-style-type: none"> Either GROWSAFE Registered Chemical Applicators Certificate Or GROWSAFE Introductory Certificate and under direct supervision of GROWSAFE Registered Chemical Applicators Certificate 	<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.

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				(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"	
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	Not Applicable	<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: 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>	<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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	Not Applicable	<p>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."</p>	<ul style="list-style-type: none"> • Does not contain correct name of the GROWSAFE qualification. • Requirement should also include the AIRCARE accreditation.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Amend	Delete new condition d) from Rule 12.B.1.5.	• Approach is not supported.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	<p>Amend Rule 12.C.1.1 as follows:</p> <p>"The discharge of sediment to water from a permitted activity providing:" Add "or" at the end of point i) and ii) "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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Amend Rule 12.C.1.2 by deleting 'where the discharge is about to enter water' and include after	• Not clear why two rules are required for groundwater (12.C.1.2 and 12.C.1.3).

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				a zone of reasonable mixing and amend the Schedule 16 figures as sought elsewhere in this submission.	<ul style="list-style-type: none"> • 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Delete Rule 12.C.1.3 and establish a process to work with growers to develop a rule that is practical and workable for growers, including undertaking base research to establish N leaching figures from a range of horticultural crops grown in the region.	<ul style="list-style-type: none"> • No rationale for the N leaching figures. • OVERSEER 6.0 does not include all horticultural crops and will be outdated in 2019. • Not appropriate for all data to be supplied to ORC or ORC to undertake nutrient budgets for every rural landowner applying nitrogen. • No consideration of cost. • Maps based on scale thats impossible to determine if grower in or out of nitrogen sensitive zones.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	Amend Rule 12.C.1.5 a) as follows: "There are no more than minor effects to the water level or hydrological function ..."	<ul style="list-style-type: none"> • Almost impossible to meet. Any discharge is likely to cause a degree of change. • Discharges of water to water can have positive effects on ecosystems.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Amend Rule 12.C.1.6 f) as follows: "There are no more than minor effects to the water level or hydrological function..." Delete ii) Water supply transport system and conditions d) and e)	<ul style="list-style-type: none"> • Almost impossible to meet. Any discharge is likely to cause a degree of change. • No definition of the term ' water supply transport system'.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend Rule 12.C.2.1) as follows: "The discharge of contaminants to land, or to water, or to land where it may enter water that does not meet the permitted activity conditions in Rules 12.C.1.1 - 12.C.1.5 is a restricted discretionary activity. The matters to which Council will restrict its discretion are those permitted activity conditions that the activity did not meet."	<ul style="list-style-type: none"> • Should include discharges to water or to land where it may enter water. • Should apply to activities that do not meet permitted activity rules 12.C.1.1 - 12.C.1.5.
121	Simplifying and streamlining	Chapter 15 - Methods	Oppose	Retain provisions in 15.5 Methods other than rules for Codes of practice and environmental management systems.	<ul style="list-style-type: none"> • Effective and efficient mechanisms to use. • Assist with achieving environmental outcomes that are practical, workable and measurable.
124	Simplifying and streamlining	Information requirement 16.3.3 - The discharge of water or contaminants	Oppose	Retain 16.3.3 Information requirements.	<ul style="list-style-type: none"> • 12.C.2.1 should be widened to provide for a range of activities. Therefore, 16.3.3 should be retained.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Withdraw Schedule 15 and establish a process with the community to review the natural and human use values in the Plan and amend Schedule 15 so that the natural and human use values are supported and achievable.	<ul style="list-style-type: none"> • Targets do not support human use values. • Descriptors in Table 15.1 overlap, are general and difficult to quantify. • Targets are unrealistic. • No robust technical analysis of numbers or cost-benefit analysis of effectiveness and efficiency. • No clear rationale for the 5 receiving water groups.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Withdraw Schedule 16 and establish a process with the community to review the natural and human use valued in the Plan and amend Schedule 16 so that the natural and human use values are supported and achievable.	<ul style="list-style-type: none"> • Limits are unrealistic. • Application and implementation unworkable. • No robust technical analysis of numbers or cost-benefit analysis of their effectiveness and efficiency. • Unclear how 2 areas in Schedule 16 relate to the 5

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					receiving water groups in Schedule 15. • Maps are not at sufficient scale.
130	Permitted contaminant discharges	Fertiliser - Glossary definition	Amend	Amend definition of fertiliser to read: "Any substance (whether solid or fluid in form) which is described as or held out to be for, or suitable for, sustaining or increasing the growth, productivity, or quality of plants or animals through the application of essential nutrients to plants or soils."	• Should be consistent with the Code of Practice for Nutrient Management.
131	Other matters	Minor and consequential changes	Not Applicable	Horticulture NZ seeks that consequential changes are made as required to give effect to the changes sought in this submission.	• As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	Withdraw all elements of the Plan Change and conduct a process similar or the same as the process outlined in Appendix 1. Otherwise, provide for the relief outlined in this submission.	<ul style="list-style-type: none"> • Doesn't support plan change 6A, withdraw and undertake fully consultative process and a full cost benefit analysis. • NPSFW states water quality limits must reflect local and national values. Process for setting limits should be informed by best available information and scientific and socio-economic knowledge. • Chapter 5 of water plan with natural and human use values not reviewed, inappropriate. • Values must be determined before establishment of freshwater objectives and limits and approach to managing the limits. • Development of Plan Change should be undertaken in accordance with NPSFW process. • Section 32 report limited, does not adequately address implementation costs, no clear assessment of efficiency and effectiveness. • Considers the cost of meeting plan change may render some land unable to be used for horticultural production, an unreasonable cost.
208	Policy framework	Chapter 7 - general requests	Amend	Insert reasonable mixing zones and a policy on reasonable mixing that provides for reasonable mixing into provisions in Plan Change 6A.	<ul style="list-style-type: none"> • Removal of mixing zones removes ability to implement the RMA approach by adverse effects being avoided, remedied, or mitigated. • Inconsistency between regimes for point source and non-point discharges.
209	Discharge rules	Chapter 12 - general requests	Amend	This approach is not supported in the plan change.	<ul style="list-style-type: none"> • Only allowing for permitted or prohibited activities is contrary to Part II RMA. • RMA clearly allows for broader regulatory structure. • Appears if activity is not permitted then it is prohibited.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	A land use activity based approach more workable	<ul style="list-style-type: none"> • Certainty and implementation should have been considered in selection of a strategic approach. • Had proposed limits been presented with Rural Water Quality Strategy, highly unlikely there would have been support.
227	Prohibitions	Prohibitions - general requests	Oppose	That Rules 12.C.0 be deleted and a detailed analysis undertaken to identify a more appropriate set of rules that are technically justified which provides certainty and clarity about exactly what activities would be prohibited.	<ul style="list-style-type: none"> • Broad, contain terms that are not well defined. • Many activities may be classed as prohibited as lack of certainty. • Not appropriate effects based planning. • Prohibited activity rules need to be certain, specific and clear, and no discretion to ORC. • Unclear if analysis undertaken to show rules most efficient and effective means of meeting objectives.

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245	Other matters	Future plan changes	Not Applicable	If the approach in Plan Change 6A is to be retained include a requirement for urban discharges and septic discharges to meet limits in Schedule 16.	<ul style="list-style-type: none"> • Inequitable approach to discharges. • Horizons one plan showed urban and road network based sources were significant contributors to degradation. • To not address urban discharges places unfair burden on rural land use activities.

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22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	The proposed plan change should be amended to include a goal of excluding farm stock from the beds of rivers, lakes and wetlands by 2017. Farm stock should be prohibited from disturbing these beds at all times (for any purpose). However, where absolutely necessary, rare occurrences of bed disturbance could be permitted for the purpose of stock movement (e.g. Seasonal muster). Permits should be sought from the ORC for any such disturbance of the beds.	<ul style="list-style-type: none"> • Exclusion of stock from waterways key to safeguarding water quality, ecological and recreational values. • Need for alignment with goals of Clean Streams Accord and environmental goals of many regional councils. • Need to fence off buffer zone of 10 m from river banks and buffer zone of 20 m from lake shores.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	The proposed plan change should be amended to include a goal of excluding farm stock from the beds of rivers, lakes and wetlands by 2017. Farm stock should be prohibited from disturbing these beds at all times (for any purpose). However, where absolutely necessary, rare occurrences of bed disturbance could be permitted for the purpose of stock movement (e.g. Seasonal muster). Permits should be sought from the ORC for any such disturbance of the beds.	<ul style="list-style-type: none"> • Exclusion of stock from waterways key to safeguarding water quality, ecological and recreational values. • Need for alignment with goals of Clean Streams Accord and environmental goals of many regional councils. • Need to fence off buffer zone of 10 m from river banks and buffer zone of 20 m from lake shores.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	If this table is supposed to reflect characteristics of lakes (not just rivers), it should include characteristics of good water quality related to lakes as well. Divide the table into sections specifically listing characteristics for rivers, lakes, wetlands, and aquifers. For lakes and rivers, the absence of algal and cyanobacterial blooms (i.e. > 10 ug/L chl _a) is a characteristic which should be included. For the lay person, this could be stated as "the water does not have a murky green, brown or red colour". I also suggest including: "The absence of nuisance proliferations of aquatic plants, algae (planktonic or benthic), scums, slimes, or algae blanketing the bed."	<ul style="list-style-type: none"> • Table 15.1 does not cover all key characteristics.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Add total N and total P to these tables. Suggest that the thresholds in these tables should	<ul style="list-style-type: none"> • Omitting TN and TP from list will result in underestimation of impact of nutrient loadings to aquatic systems.

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				represent the target 95th percentile of the annual distribution of the values from each river/lake and this 95th percentile should be set as the ANZECC (2000) guideline for recreational water quality. This suggestion is for setting minimum water quality targets (i.e. for systems with a moderate to high assimilation capacity). For sensitive systems, setting the 95th percentile targets to a higher standard (i.e. drinking water standard) might be appropriate.	<ul style="list-style-type: none"> • Not clear what numbers in this Schedule refer to. • Are numbers annual mean values or annual medians. • What is the minimum number of samples necessary? • Do these numbers relate to ANZECC guidelines?
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>Add total N and total P to these tables.</p> <p>Suggest that the thresholds in these tables should represent the target 95th percentile of the annual distribution of the values from each river/lake and this 95th percentile should be set as the ANZECC (2000) guideline for recreational water quality. This suggestion is for setting minimum water quality targets (i.e. For systems with a moderate to high assimilation capacity). For sensitive systems, setting the 95th percentile targets to a higher standard (i.e. drinking water standard) might be appropriate.</p>	<ul style="list-style-type: none"> • Omitting TN and TP from list will result in underestimation of impact of nutrient loadings to aquatic systems. • Not clear what numbers in this Schedule refer to. • Are numbers annual mean values or annual medians. • What is the minimum number of samples necessary? • Do these numbers relate to ANZECC guidelines?
208	Policy framework	Chapter 7 - general requests	Amend	Support the special mention of significant wetlands throughout the water plan; however, would like the ORC to include similar protections for the water quality and ecological values of Otago's significant lakes, rivers, estuaries and aquifers.	<ul style="list-style-type: none"> • Need to safeguard the water quality and ecological values of all fresh- and brackish water bodies.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	<p>Would like the ORC to adopt at least two different approaches - one for more sensitive catchments and one for catchments with greater assimilation capacity. As other regional councils (e.g. Waikato, Horizons, EBOP, ES) are discovering, one policy approach is not sufficient for all situations.</p> <p>The S 32 report should be peer reviewed by at least 2 experts from other Regional Councils. Suggest inviting people from Environment Waikato, Horizons, EBOP or Environment Southland to peer review the report as these councils are advancing in the way they manage water quality issues. The peer reviews should be made public and sent to all submitters.</p>	<ul style="list-style-type: none"> • More than one approach required to manage different water issues and situations. • Responsibilities for monitoring and decision-making should rest with Council. • Cannot expect lay people to properly collect samples, interpret data, and pay for measurements. • Strong need for expertise, rules and penalties to bring those breaching their responsibilities into line. • For sensitive catchments other approaches being used include nitrogen cap-and-trade, limitations on land-use development. • S 32 report concludes effects-based approach warranted all Otago, however, proposal to turn over practical aspects of catchment management to communities questionable as they do not have expertise, incentives or access to measurement technologies. Will lead to "Tragedy of the Commons", where responsibilities for managing collective resource diffused to such an extent that prudent management not possible. • The cost-benefit analysis is not backed up by rigorous evidence (at least no references are given). • Conclusions of S 32 report need to be examined by independent experts and backed up by evidence.

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14	Defining good water quality	Section 7.5/7.A - Objectives	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Amend	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.	<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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	Retain Policy as publicly notified.	<ul style="list-style-type: none"> Supports policy.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Support	Retain Policy as publicly notified.	<ul style="list-style-type: none"> Supports policy.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	Amend	Amend to read: "7.B.5 Recognise the values of lwi, biodiversity values and biosecurity matters when water is discharged from one catchment to another."	<ul style="list-style-type: none"> Risk of introduction of pests, weeds, fish and invertebrate species.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	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."	<ul style="list-style-type: none"> PC6A depends on ORC monitoring water quality and enforcing water quality standards efficiently and effectively.

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36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Amend	Amend to read: "Provide for the consideration of discharges that exceed Schedule 16 limits as part of the development of technology or innovative 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."	<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.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
60	Beyond the scope	Rule 12.B.1.6 / 12.11.2.1 - Sullage, cooling water, drinking supply, pool discharge permitted	Not Applicable	Retain as publicly notified.	<ul style="list-style-type: none"> • Provides appropriate protection for ensuring maintenance of water quality.
62	Beyond the scope	Rule 12.B.1.8 / 12.4.1.1 - Stormwater reticulated discharge permitted	Not Applicable	Retain 12.B.1.8 (a)(i) as publicly notified.	<ul style="list-style-type: none"> • Supports as notified.
65	Beyond the scope	Rule 12.B.3.1 / 12.4.2.1 - Stormwater discharge restricted discretionary	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Amend	Add: "(iii) 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	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	<ul style="list-style-type: none"> • Does not give full effect to RMA S107. • Does not capture farm waste dumps, including ofal pits.

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				aquatic life; is a prohibited activity."	
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Amend as follows: "The temporary discharge of sediment to water is a permitted activity, providing: (i) After the cessation of rainfall on the site, the discharge does not 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."	<ul style="list-style-type: none"> • (i) contrary to RMA S107(1). • Helpful to clarify provision applies to temporary discharges only.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Support	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. Certainty that the rule will capture diffuse discharges.	<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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend to read: "The discharge of nitrogen from land to groundwater, is a permitted activity, providing: (i) From 31 March 2019 2017, calculated nitrogen leaching by the Council using the latest OVERSEER.... (a) ...; and (b) 25 kilograms" Add cross reference to Rule 12.C.0.1. Add North Otago Volcanic Aquifer to Map I and ensure all aquifers are incorporated into the plan and maps.	<ul style="list-style-type: none"> • Supports identifying nitrogen sensitive zones, and the tailoring of nitrogen limits accordingly. • Doubt whether all aquifers and nitrogen sensitive zones have been identified. • Inconsistencies between PC6A and consultation materials. • Needs to clarify N discharges to groundwater are only permitted if not prohibited under 12.C.0.1. • OVERSEER is likely to be updated in future. • March 2019 provides an unnecessarily long time lag.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	Amend to read: "12.C.1.4 The discharge of contaminants from any animal waste system to land, is a permitted activity, providing: (a) The discharge occurs more than 50 metres from any surface water body, any bore used to supply water for domestic needs; and"	<ul style="list-style-type: none"> • Contaminants within animal waste systems are highly likely to cause adverse effects on aquatic ecosystems.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Support	Retain as publicly notified.	<ul style="list-style-type: none"> • Rule is appropriate and gives effect to RMA.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Support	Retain as publicly notified.	<ul style="list-style-type: none"> • Rule is appropriate and gives effect to RMA.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Add the following matters; "Any adverse effects on aquatic life, contact	<ul style="list-style-type: none"> • Potential for short term discharges to have significant adverse effects on ecological, natural, human and stock

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>recreation, drinking and stock water."</p> <p>Define "short term".</p> <p>Delete (b), (h), (i).</p> <p>Delete: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."</p> <p>Add new specifically targeted rule to allow notified discretionary consents to provide for innovation of untried but promising management regimes to be given a year to trial.</p>	<p>use of waters.</p> <ul style="list-style-type: none"> • (h) suggest that it may be OK to adversely affect a RSW provided there is a financial contribution. • Rule as proposed provides loophole that could be used by industry laggards. • Existing discharges that cannot meet Schedule 16 should not be able to apply for non notified restricted discretionary consents.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Amend	<p>Add the following matters; "Any adverse effects on aquatic life, contact recreation, drinking and stock water."</p> <p>Delete (h)</p> <p>Delete: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."</p>	<ul style="list-style-type: none"> • Potential to have significant adverse effects on ecological, natural, human and stock use of waters and wetlands, including introduction of pests, weeds, fish and invertebrate species. • (h) suggests that it may be OK to adversely affect a RSW provided there is a financial contribution. • Must be an opportunity for public submissions where discharges can affect public interests and publicly owned resources.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Amend	<p>Add cross reference.</p> <p>Amend 13.1.1.1 to read: "The use of any structure that is fixed in, on, under, or over the bed of any lake or river, or any Regionally Significant Wetland, or wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX is a ..."</p>	<ul style="list-style-type: none"> • Rule deals with animal waste, not human. This should be cross-referenced as assists with understanding the plan. • Not all RSWs have been identified.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	<p>Add the following matters: "[h] Animal waste is prevented from entering the water body and its margins. [i] The bridge, or its erection or placement, does not occur in a Regionally Significant Wetland or wetland that meets the criteria for Regionally Significant Wetland in Schedule XXXX."</p>	<ul style="list-style-type: none"> • Discharge of animal waste should be prevented. • Erection of bridges can have adverse impacts on aquatic and wetland values and should be controlled by discretionary consent.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Amend	<p>Add the following words: "The erection or placement of any board walk for recreational purposes in, ... (b) Animal waste is prevented from entering the water body and its margins. (c) The structure is maintained in good repair."</p>	<ul style="list-style-type: none"> • Boardwalks can be permitted provided they are for recreational purposes and do not result in discharge of animal waste.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	<p>Add: "(j) Its erection or placement, does not occur in a Regionally Significant Wetland or wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX."</p>	<ul style="list-style-type: none"> • Erection of structures including crossings can have significant adverse effects on water quality.
111	Bed disturbance - structures and animal waste	Rule 13.3.2.1 - Alteration of a structure restricted discretionary	Amend	<p>Amend 13.3.2.1 as follows: "Except as provided for by Rules 13.3.1.1 and 13.3.1.2, the extension, alteration, replacement or</p>	<ul style="list-style-type: none"> • Rule as proposed has potential to adversely affect ecological functioning and values of water bodies. • Consent authority should not be precluded from publicly

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

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				<p>reconstruction of any structure, fixed in, on, under or over the bed of any lake or river, or any Regionally Significant Wetland, or wetland that meets the criteria for Regionally Significant Wetland in Schedule XXXX...</p> <p>Add the following matters:</p> <p>(a) ...</p> <p>(v) Indigenous flora and fauna</p> <p>(vii) Any adverse effect on, water levels, and/or hydrological functioning.</p> <p>(aa) Any effect on any Regionally Significant Wetland or wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX, or on any regionally significant wetland value."</p> <p>Delete: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."</p>	<p>notifying consents that are likely to result in adverse effects.</p>
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	<p>"Amend to read:</p> <p>(i) Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or its margins."</p> <p>Add:</p> <p>"(j) The activity does not occur in a Regionally Significant Wetland or a wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXXX."</p>	<ul style="list-style-type: none"> • Rule as proposed has potential to adversely affect ecological functioning and values of water bodies. • Need to protect RSWs and their margins.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	<p>Delete the words "any Regionally Significant Wetland"</p> <p>Add to (h):</p> <p>"Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or its margins."</p> <p>Add:</p> <p>"(i) The activity does not occur in a Regionally Significant Wetland or a wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXX."</p>	<ul style="list-style-type: none"> • Rule as proposed has potential to adversely affect ecological functioning and values of water bodies. • Need to protect RSWs and their margins.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	<p>Add:</p> <p>"(h) there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or its margins."</p> <p>"(i) The activity does not occur in an area identified in Schedule "Significant Aquatic Values" or is not a</p>	<ul style="list-style-type: none"> • Rule as proposed has potential to adversely affect ecological functioning and values of water bodies. • Need to protect RSWs and their margins.

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				Regionally Significant Wetland or a wetland that meets the criteria for a Regionally Significant Wetland in Schedule XXX."	
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	<p>Amend to read: "The disturbance of the bed or margin of any lake or river, or any wetland by livestock is a permitted activity, providing it maintains the characteristics of good water quality in Schedule 15 and does not: (a) Cause or induce slumping, pugging or erosion; or (b) Expose soil; or (c) Involve feeding out; or (d) Involve grazing of dairy cows, including dairy runoff, farmed deer, farmed pigs; or (e) Involve livestock* contained for break-feeding or grazed on irrigated land, adjacent to a river, lake or wetland; or [* including cattle, sheep, deer, horses, pigs, goats, lama, alpacas] (d) Increase the colour or reduce the visual clarity of water; or (f) Damage indigenous fauna, or indigenous flora, in or on the bed or margin of any lake or river, or wetland; or (g) Occur in or on any Regionally Significant Wetland, or its margin, or occur in areas that meet criteria for regionally significant wetland in Schedule XXXX.</p> <p>Activities which breach rule 13.5.1.8A are a prohibited activity.</p>	<ul style="list-style-type: none"> • Rule as proposed has the potential to adversely affect the ecological functioning and values of water bodies. • Stock in riparian areas has adverse impact on water quality. • Inadequate fencing under the clean streams accord. • Rule as proposed very difficult to enforce and monitor. • Similar permitted activity status has not worked. • Simplest, most enforceable and most certain method is fencing dairy stock, cattle, farmed pigs, deer out of streams and RSWs. • Note rule does not cover margins of lakes, rivers, streams, or wetlands. It should if not covered elsewhere.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Support	Retain 13.5A.0.1 as publicly notified.	<ul style="list-style-type: none"> • Support this rule.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	<p>Ensure Schedule 15.1 is adequately incorporated as a standard into all relevant rules. Define over what length of bed 30% refers to for the extent of coverage by algae. Define vegetation cover as; Vegetation cover provides buffer from adjoining land uses, and discharges.</p>	<ul style="list-style-type: none"> • Supports schedule, which should be part of permitted activity status for all rules. • Not clear what area of bed 30% coverage refers to for algae coverage. • The term "Vegetation is not stripped bare" does not describe a healthy margin.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	<p>Amend Table 15.2 to state precise locations for where the specified standards are to be applied, and ensure that they provide as short as possible time frames for current inferior water to be upgraded to meet 'good' or better standards, and ensure that waters with current very good and good water quality are maintained or improved, and all water bodies meet standards suitable for contact recreation and human consumption at all times.</p> <p>Amend Table 15.2 to split upper and lower catchments so that upper catchments, above 900m</p>	<ul style="list-style-type: none"> • Bring all waters that are currently below "good" up to or beyond "good". Maintain or improve waters classified as "good". Maintain waters classified as "very good" • It is not recognised rivers draining higher altitude and lesser developed areas have excellent water quality. • Timeframes to improve water quality standards must not exceed 5 years.

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				are in a Receiving Waters Group that has standards that maintain them with 'very good' water quality. Amend Table 15.2 to ensure that catchments with predominantly indigenous vegetation (70% indigenous cover or more) are in a Receiving Waters Group that has standards that maintain them with "excellent" water quality.	
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Amend Schedule 16 if necessary to ensure that it provides for current inferior water to be upgraded to meet 'good' or better standards, and ensure that waters with current very good and excellent water quality are maintained or improved. Delete time frames of March 2019 and replace with March 2017.	<ul style="list-style-type: none"> • Supports Schedule as long as improves all waterways.. • Reduce timeframes to 5 years. • Improving water quality is a keenly sought priority by general public.
203	Simplifying and streamlining	Removal of issues - general requests	Oppose	Re-instate the issues section.	<ul style="list-style-type: none"> • Environment Court judgements point out the importance of issues.
208	Policy framework	Chapter 7 - general requests	Amend	Add definitions for 'good', 'very good' and 'excellent' water quality based on SOE Surface Water Quality 2007 report. Add definition of adaptive management to the Glossary: "Adaptive management is a systematic process for continually improving management policies and practices by learning from the outcomes of previously employed policies and practices. It requires careful implementation, monitoring, evaluation of results, and consequent adjustment of objectives and practices." Define short term as "less than xx working days".	<ul style="list-style-type: none"> • Definitions will help plan users to understand Plan provisions.
211	Implementation	Compliance, enforcement, education	Not Applicable	The approach of setting limits and only requiring consents if limits are not met, will require constant vigilance by Council to monitor and enforce limits.	<ul style="list-style-type: none"> • Congratulate ORC on innovative approach. • Plan's integrity can only be upheld by strict enforcement.
222	Beyond the scope	Beyond the scope - general	Not Applicable	Add the following as a Schedule Schedule XX Ecological Criteria 1. Ecological Context The ecological context of the wetland has one or more of the following functions and or attributes: a. a role in protecting adjacent ecological values, including adjacent and downstream ecological and hydrological processes, indigenous vegetation, habitats or species populations; or b. is a habitat for critical life history stages of indigenous fauna including breeding/spawning, roosting, nesting, resting, feeding, moulting, refugia, migration staging points (as used seasonally, temporarily or permanently); or c. it contributes to ecological networks (such as connectivity and corridors for movement of	<ul style="list-style-type: none"> • Not all significant wetlands are identified. • Need to include a schedule of criteria for identifying wetlands.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>indigenous fauna); or d. it contributes to the ecological function and processes within the wetland.</p> <p>2. Representative Wetlands A representative wetland is one that contains indigenous wetland vegetation types or indigenous fauna assemblages that were typical for, and has the attributes of, the relevant class of wetland as it would have existed prior to 1840.</p> <p>The criterion will be satisfied if the wetland (not including pakihi wetlands) contains indigenous wetland vegetation types that have the following attributes: Either (a): i. The indigenous wetland vegetation types that are typical in plant species composition and structure; and ii. The condition of the wetland is what would have existed prior to 1840 in that: • indigenous species dominate; and • most of the expected species and tiers of the wetland vegetation type(s) are present for the relevant class of wetland.</p> <p>Or (b): The wetland contains indigenous fauna assemblages that: • are typical of the wetland class; and • indigenous species are present in most of the guilds expected for the wetland habitat type.</p> <p>The representative wetland criterion applies to the whole or part of the wetland irrespective of land tenure.</p> <p>Each wetland is to be assessed at the ecological district and freshwater biogeographic unit scale.</p> <p>3. Rarity The wetland satisfies this criterion if: a. nationally threatened species(1) are present(2). or b. nationally at risk species or uncommon communities or habitats are present and the population at this site has an important contribution to the national population and distribution of a species or number of at risk species or distribution and extent of threatened or uncommon communities or habitats.; or c. regionally uncommon species are present; or d. is a member of a wetland class that is now less than 30% of its original extent as assessed at</p>	

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				<p>the ecological district and the freshwater biogeographic unit scales; or</p> <p>e. excluding pakihi, it contains wetland ecosystems that re identified as historically rare by Williams et al (2007).</p> <p>4. Distinctiveness The wetland satisfies the distinctiveness criterion if it has special ecological features of importance at the international, national, freshwater biogeographic unit or ecological district scale including:</p> <p>a. intact ecological sequences such as estuarine wetland systems adjoining tall forest species distribution limit; and</p> <p>b. an unusual characteristic (for example an unusual combination of species, wetland classes, wetland structural forms, or wetland landforms).</p> <p>Explanation The wetland classes may be determined in a number of ways including the classification index of Johnson and Gerbeaux (2004). Wetland indigenous vegetation types are identified with reference t the dominant plants species that are present, the structural class, wetland class and hydrosystem (see for example Johnson and Gerbeaux (2005)) or similar method.</p> <p>(1) The Threatened and At Risk categories are defined in the current version of the New Zealand threat classification system (Townsend et al 2008). Species are reassessed according to these categories approximately every three years. (2) For mobile species such as kotuku this requires some assessment of the importance of the site for the species i.e. the intention is not to include areas such as wet pasture where birds may be foraging.</p>	

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	The measurement of nitrogen leachates using OVERSEER has been shown to be unreliable.	<ul style="list-style-type: none"> • OVERSEER model has not proven to be reliable.
240	Water discharges	Water discharges - general requests	Amend	Need to remove the word "drainage" in relation to non-point source pollutants.	<ul style="list-style-type: none"> • South Otago relies on ditching, tiling, and mole ploughing. • Drainage should be considered when effluent or contaminant is introduced. • Drainage cannot be lumped in with run-off and leachate as source of non-point source pollution.

273 Fish and Game (Central South Island)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Simplifying and streamlining	Section 7.2 - Issues in general	Amend	Reinsertion of the issues and contextual information. If the current issues are not appropriate, then they should be amended, rather than removed. 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."	<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.
14	Defining good water quality	Section 7.5/7.A - Objectives	Amend	Include explanations under the objectives.	<ul style="list-style-type: none"> Provides guidance toward interpreting objectives. Provides certainty.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend "good" to "at least good" water quality. Amend (a) as follows: "Avoiding discharges of contaminants with effects on natural and human use values;..." Amend (b) as follows: "Allowing discharges of contaminants that cumulatively have minor effects; and..."	<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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	Retain as worded.	<ul style="list-style-type: none"> Support discharge of contaminants to land in preference to water.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Amend	include: "(d) Cumulative effects."	<ul style="list-style-type: none"> Supports policy with addition of new matter acknowledging cumulative effects.
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	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 regarding the risks of transference of water between catchments.	<ul style="list-style-type: none"> Concerns about disease and effects on fish genetics of mixing water.
24	Defining good water quality	Section 7.6 - Policies for the enhancement of water quality	Oppose	Retain.	<ul style="list-style-type: none"> In most cases, water quality has not improved in these catchments.

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31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	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.
38	Simplifying and streamlining	Section 7.9 - Anticipated environmental results	Oppose	Retain.	<ul style="list-style-type: none"> • No link between plan and expected monitoring outcomes. • Removal is not necessary and counterproductive.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Amend	<p>Amend the conditions for the activity to be permitted to include:</p> <p>"There shall be no fertiliser visible on the ground or groundcover immediately following the discharge, within 10 metres from:</p> <p>(i) the bed of a permanently flowing river, or</p> <p>(ii) the bed of a lake, or</p> <p>(iii) a wetland boundary."</p>	<ul style="list-style-type: none"> • Setbacks required to reduce risk of run-off. • Ensures compliance can be determined.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Amend the rules, or insert advice notes, to allow for the implementation of the next version of OVERSEER, if it reaches a specified technical threshold.</p> <p>Review the evidential basis for the setting of the limits for nitrogen per hectare and make corresponding changes.</p> <p>Add a schedule indicating in which catchments compliance with the application limits is likely to be difficult.</p>	<ul style="list-style-type: none"> • Need for research to assess appropriateness of the limits (particularly the 30kg N/ha/yr on wet soils). • Need for guidance on compliance and monitoring in catchments where it may be difficult to meet the standards. • Council should not be limited by one version of specific software.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Clarification on the notification level of restricted discretionary consents under these rule, in particular clarify that Fish and Game will be notified as an affected party.	<ul style="list-style-type: none"> • Can only support rule if notification level is for limited notification.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Amend	Clarification on the notification level of restricted discretionary consents under these rule, in particular clarify that Fish and Game will be notified as an affected party.	<ul style="list-style-type: none"> • Can only support rule if notification level is for limited notification.
112.1	Bed disturbance - remobilisation	Section 13.5 - Bed disturbance - general requests	Amend	<p>Include the Schedule identifying areas of significant spawning habitat.</p> <p>Add rules requiring resource consents as follows:</p> <p>"Zone 1: The grazing of the bed of a waterway in the waterways in the schedule will require a consent, presumably as a restricted discretionary activity, with the discretion restricted to the issue of fish spawning. The notification level should be limited notification."</p> <p>"Zone 2: The erection of any structure in the scheduled waterways will require activity with the discretion restricted to the issue of fish spawning. The notification level should be limited notification."</p> <p>Or in the alternative, insert a new rule requiring that</p>	<ul style="list-style-type: none"> • Request for creation of two zones. • Information on areas of significant spawning habitat for native and introduced fish will be supplied by DoC and F&G.

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				resource consents be required for grazing and the erection of structures in waterways that have significant spawning habitat.	
125	Defining good water quality	Schedule 15 - Good quality water	Support	Address the use of Schedule 15 in an explanation. Clarity need to be provided on whether the standards in Schedule 15 are within the receiving bodies, or for contaminants in a discharge prior to them entering water.	<ul style="list-style-type: none"> • Supportive of setting water quality standards and timeframes for achieving these. • Limits are ecologically sound and will improve water quality where degraded.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Include the following measures: - The Macroinvertebrate Community Index (MCI) - Temperature - Periphyton growth	<ul style="list-style-type: none"> • Qualitative definitions hard to understand and enforce. • "Vegetation is functioning and healthy" may be better measure than "vegetation is not stripped bare".
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Support	Address the use of Schedule 15 in an explanation. Clarity need to be provided on whether the standards in Schedule 16 are within the receiving bodies, or for contaminants in a discharge prior to them entering water.	<ul style="list-style-type: none"> • Limits are ecologically sound and will improve water quality where degraded. • Supportive of setting water quality standards and timeframes for achieving these.
211	Implementation	Compliance, enforcement, education	Not Applicable	A new Schedule be created for this plan, indicating the methodology that will be used to assess noncompliance with the plan. In particular, it should indicate the following: - Methods used to determine the source and direction of discharge - The approach used in cases where it cannot be distinguished which individual property that a discharge may be coming from. The ability to jointly prosecute noncompliant properties needs to be an option. - A list of priority catchments for compliance work. This is substantially the same list as was in Policy 7.6 which has now been removed, and it is also much the same list as in the recent State of the Environment water quality report.	<ul style="list-style-type: none"> • Clarity about compliance and monitoring required to enact this plan change and to make it effective. • Plan provides no direction on compliance and monitoring. • Provides no evidence on feasibility of ensuring compliance. • For plan to be effective there needs to be confidence that it's practicable and enforceable. • How will non-compliant catchments be studied to determine where non-compliance will be occurring. • If compliance and is not addressed then plan change risks failing.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	More alignment between Canterbury Water Management Strategy (CWMS) Zone of Implementation Programme and the Plan, to ensure CWMS targets met.	<ul style="list-style-type: none"> • Lower Waitaki South Coastal Canterbury zone overlaps with area covered by plan change.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Amend	Amend rules 12.1 and 12.2 to include the effects of the use of water in the matters to which discretion is restricted.	<ul style="list-style-type: none"> • Without rules for controlling land use intensification, specifically irrigation, the desired Schedule 15 standards may not be met or maintained.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Oppose	ORC to consult with farming groups to ensure any new rules are workable for the farmer, and that not only the environmental impact but also the social economical and cultural impacts have been considered. I would like to see evidence that suggests our current farming (non-intensive) practices are having	<ul style="list-style-type: none"> • Oppose rule as not workable or practical. • Fencing comes at huge cost. • No evidence provided that changes will protect or improve water quality from current.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				a negative impact on water quality. I would like the authority to tell me in detail what evidence they have that will show that the suggested changes will in fact increase or protect our water quality more so than our current farming methods.	
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Oppose	ORC to consult with farming groups to ensure any new rules are workable for the farmer, and that not only the environmental impact but also the social economical and cultural impacts have been considered. Would like to see evidence that suggests our current farming (non-intensive) practices are having a negative impact on water quality. Would like the authority to tell me in detail what evidence they have that will show that the suggested changes will in fact increase or protect our water quality more so than our current farming methods.	<ul style="list-style-type: none"> • Oppose rule as not workable or practical. • Fencing comes at huge cost. • No evidence provided that changes will protect or improve water quality from current.
248	Other matters	Supports another submission	Not Applicable	No decision requested	<ul style="list-style-type: none"> • Agrees with Federated Farmers comments on rule 13.5.1.8A and 13.5.A, support their submissions in respect to this [submitter number 278].

275 T M and C M Scurr

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Oppose	Opposes rule.	<ul style="list-style-type: none"> • Stock movements in high country in their grazing habits and in season's movements are essential. • Have strong hard ground and no problems with mud. • Not practicable to fence waterways and build thousands of crossings.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	A catchment by catchment standard and limits should apply.	<ul style="list-style-type: none"> • Setting an Otago wide standard is not a good idea as Cardrona Valley has other characteristics.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	A catchment by catchment standard and limits should apply.	<ul style="list-style-type: none"> • Setting an Otago wide standard is not a good idea as Cardrona Valley has other characteristics.
202	General opposition	Whole plan change (general opposition)	Amend	That the changes outline in submission be implemented, or otherwise that the present draft of PC6A be rejected or withdrawn.	<ul style="list-style-type: none"> • No reason given.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Section 5.5, Option 2 [Section 32 report] - A catchment by catchment standard and limits should apply. Section 5.7, Option 2 [Section 32 report] - Out of the question to fence waterways and build thousands of crossings.	<ul style="list-style-type: none"> • Setting an Otago wide standard is not a good idea as Cardrona Valley has other characteristics. • Stock movements in high country in their grazing habits and in season's movements essential. Have strong hard ground and no problems with mud.

276 Karl Guy

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading	Amend	Would like to see the limit lifted to at least 50 kg N	<ul style="list-style-type: none"> • Will cause issues for farmers on border-dyke irrigation

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		permitted		and the time frame be extended until 2025.	schemes including: 1) need to convert to different irrigation system; 2) need to become less intensive; both of which have financial implications. • More monitoring is needed before any rules are put in place.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	The rule needs to be reworked to provide for catchment loading and testing rather than modelling to determine compliance with any nitrogen leaching rules. Non-compliance with Overseer values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> • Concerned about use of Overseer to determine compliance with rule as it only provides a theoretical leaching figure. • Limit values don't reflect catchment differences and should be determined by actual groundwater testing. • Compliance with rule could risk economic viability of farming business.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Support	Adopt the objective and ensure that policies and rules give effect to the objective throughout the plan change.	• Supports, but notes plan change doesn't encourage community or catchment-based approaches to improving water quality.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Adopt Policy 7.B.4 as proposed.	<ul style="list-style-type: none"> • Facilitates on-going learning throughout the process. • Enables ORC and plan users to learn more about the impact of contaminants and ensure better long-term results.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	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."	<ul style="list-style-type: none"> • 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. • 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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Include policy guidance on where a consent is required and how long a consent will be issued for.	the limits over time.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Amend	Delete existing policy 7.D.3 [and incorporate into 7.D.2].	<ul style="list-style-type: none"> 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. 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.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	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.
56.2	Beyond the scope	Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted	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.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Amend	Delete prohibited activity in Rule 12.C.0.1. 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge	Amend	Delete prohibited activity in Rule 12.C.0.2.	<ul style="list-style-type: none"> Prohibits discharges that have any measurable effect on

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		prohibited		Replace prohibited with non-complying. Adopt rule as non-complying with the following amendments: Repword rule in accordance with section 107 and provide for reasonable mixing.	the receiving water at the point of discharge. <ul style="list-style-type: none"> 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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).
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	The deletion of Rule 12.C.0.4.	<ul style="list-style-type: none"> Rule has immediate effect meaning breaches have already occurred. 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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	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."	<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).
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Adopt the rule with the following amendments: "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..." "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 ..."	<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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>That Council delete Rule 12.C.1.3 and replace with a modified rule relying on amended Schedule 16 discharges.</p> <p>Or</p> <p>If the rule is adopted then the following amendments are made: "The discharge of nitrogen from land to groundwater, is a permitted activity providing:</p> <p>(i) From 31 March 2019, calculated nitrogen leaching by the Council using from any one farming enterprise does not exceed:</p> <p>(a) 30 kilograms nitrogen....</p> <p>(b) 50 kilograms nitrogen...</p> <p>(c) add additional limits based on the receiving environment and specific to catchments.</p> <p>(ii) Upon request, the person with responsibility for the management of the land supplies the Council verified OVERSEER records by an accredited OVERSEER operator.</p> <p>Where limits in rule 12.C.1.3 are exceeded under this rule a resource consent is required under Rule 12.C.2.1."</p>	<ul style="list-style-type: none"> • Supports permitted approach but limits aren't realistic or achievable in many cases. • Nitrogen sensitive zones will put people out of business. • Farmers won't know if they are meeting nitrogen limits until OVERSEER run by an accredited person. • Input information should be administered by landholder, not ORC. • Oppose use of specific version of OVERSEER and retrospective use of this tool to determine compliance with permitted activity rule. • OVERSEER works well for pastoral farmers, but lacks precision for irrigated land and for mixed use and cropping farmers. • Use of maximum permitted leaching rates is not effects-based and is inconsistent with the proposed plan change. • Receiving environment, rather than blanket catchment-based approach, needs to be taken. • Discharge must be represented by the change in water quality across a property, overcomes issue of upgradient cumulative additions. • If nitrogen sensitive zones not removed then loss needs to be higher, and the phase in times longer. • Rule needs to default to restricted discretionary activity if limits can't be met. • Unclear about application of rule at catchment, farm, hectare or paddock.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>Adopt rule with amendments to ensure that the plan provides a framework for compliance certainty around the safe application of these contaminants to land:</p> <p>"Where permitted activity standards are exceeded under this rule a resource consent is required under rule 12.C.2.1."</p>	<ul style="list-style-type: none"> • Supports permitted approach. • Need to provide guidance on good practice for the application of contaminants to land.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Amend	<p>Amend the rule to provide certainty on how the rule will be enforced or monitored.</p>	<ul style="list-style-type: none"> • Accept all discharges to water have to meet acceptable limits. • Unclear how rule to be administered (e.g. drains passing

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Delete the provision relating to the change in water level of a Regionally Significant Wetland. [Add] "Where limits in rule 12.C.1.5 are exceeded under this rule a resource consent is required under rule 12.C.2.1."	through multiple properties), or to what degree it covers water courses discharging into water or artificial watercourses and drains at the point of discharge into a receiving water body. • Clause causes uncertainty in how rule is applied, and part of it not directly relevant to rule.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	Adopt the rule but provide for the storage of water applied for the purposes of irrigation and the application that water subject to the rules in the plan and the site standards of Rule 12.C.1.6.	• Support permitted approach. • Provision needed for innovation around flood-based irrigation systems and the reapplication of that water to land.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Adopt the rule with amendments. Delete the words "and the discharge first occurred prior to March 2012". Include either in a separate rule or provide in this rule provision for resource consent for all activities permitted under 12.C.1.	• Discharges unable to meet permitted Rules 12.C.1.1-12.C.1.6 should default to restricted discretionary consent. • Rule should apply to all discharges. • Difficult to determine commencement, nature and scale of discharges. • Supports provision regarding publicly notifying consents.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Amend	Amend Rule 13.1.1.1(ba) to reflect below wording or similar: "(ba) All reasonable precautions are taken to ensure animal waste entering the water body is avoided."	• Support permitted approach. • Condition (ba) unachievable despite reasonable precautions being taken - impossible to prevent animal waste ever getting to water. • Use of a structure is preferable to nothing. • Rule should ensure appropriate steps and precautions are taken to minimise waste entering water.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Supports rule 13.2.1.[7].	• Supports extension of permitted rules. • Such structure will have no more than minor adverse effects.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Support	Supports rule 13.2.1.[7A].	• Supports extension of permitted rules. • Such structure will have no more than minor adverse effects.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Supports rule 13.2.1.[7B].	• Supports extension of permitted rules. • Such structure will have no more than minor adverse effects.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Amend	Adopt Rule 13.3.1 as proposed alongside inclusion of reference to Regionally Significant Wetlands.	• Activities now appropriately included. • Given that RSW specifically referred to in 13.2, it is appropriate to expressly include them in the 13.3 rules (not otherwise amended in this plan change).
111	Bed disturbance - structures and animal waste	Rule 13.3.2.1 - Alteration of a structure restricted discretionary	Amend	Amend the wording of Rule 13.3.2.1(m) to the following wording or similar: "13.3.2.1(m) Precautions taken to ensure animal waste entering water is minimised or prevented."	• More appropriate to consider what reasonable precautions farmers will take to ensure discharge of waste is minimised or prevented. • More realistic and achievable.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Adopt the rule and: - amend time to 20 hours - retain 250 metre mixing zone for visual clarity	• 10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works. • There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water quality.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	Adopt the rule and: - amend time to 20 hours - retain 250 metre mixing zone for visual clarity	• 10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works. • There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Adopt the rule and: - amend time to 20 hours - retain 250 metre mixing zone for visual clarity	<ul style="list-style-type: none"> • 10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works. • There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water quality.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Adopt the rule and: - amend time to 20 hours. - retain 250 metre mixing zone for visual clarity.	<ul style="list-style-type: none"> • 10 hrs arbitrary, 20 hours (3 working days) reflects cumulative effects of activity and time needed to undertake some works. • There has been 50% reduction in mixing zone without understanding the actual improvement in resulting water quality.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Adopt rule with amendments: "The disturbance of the bed of any lake... (d) increase the colour or reduce the visual clarity after 100m."	<ul style="list-style-type: none"> • Supports providing for stock access to water as a permitted activity. • Need to recognise that some situations are impossible to fence, and impractical to install crossings or stock water schemes.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Adopt rule as proposed with amendments: "The disturbance of the bed of any lake or river, or Regionally Significant Wetland, by livestock due to muster, is a permitted activity..."	<ul style="list-style-type: none"> • Need to allow for mustering and extra-ordinary farming activities e.g. animal health issues. • Difficult to define 'seasonal muster' and more appropriate to provide for occasional movement of stock across water for the purposes of mustering (as opposed to regular crossing).
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule from being prohibited to restricted discretionary activity.	<ul style="list-style-type: none"> • Prohibited status is unworkable, impracticable and unrealistic particularly for hill country sheep and beef farmers. • More practical and user friendly to provide alternative status (to permitted or prohibited) requiring consent, that balances environmental objectives and farming operations. • ORC should have power to decline or seek conditions that provide certainty that effects will be appropriately managed by the consent holder.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend limits and increase transition times. Review catchment and sub catchment classification.	<ul style="list-style-type: none"> • Where standards currently exceeded the timeframes should be extended to meet those of Schedule 16. • Provide stronger links between farm discharge compliance and resulting improvements in the receiving environment. • Important to define natural vs. modified waterways in schedule to clarify which waterways are captured under Schedule 15 and which require limits under Schedule 16. • Approach generally supported with use of ANZECC guidelines and appropriate scientific measuring and reporting methodologies. • Specific catchments must be accounted for. • Receiving water standards should all be consistent with ANZECC guidelines or upland and lowland classifications. Any departure requires a full explanation. • Nationally adopted MfE monitoring and reporting regime should be adhered to, including dissolved oxygen. • Approach of not allowing a single variable to be noncompliant whilst meeting a "good" water quality

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					standard is inconsistent with accepted national practice. <ul style="list-style-type: none"> • Unclear how catchments that don't flow to coast or are sub-catchments will be managed. • Minimum of 5 years to comply considered appropriate.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Amend limits and increase transition times. Maps must be updated to indicate discharge limit areas 1 and 2 to more appropriately reflect ANZECC descriptions and the state of the receiving water body.	<ul style="list-style-type: none"> • Limits unlikely to be complied with at off-farm level irrespective of receiving environment classification (i.e. even in catchments considered 'good' water quality). • Difficulties in the practicality, measurement, statistical presentation and scientific justification of the methodology. • Reflecting ANZECC median guidelines will enable sound scientific and statistical approach as opposed to notified Schedule 16. • Currently no connection between appropriate median for 'good' water quality in the receiving environment and measurement and reporting of the discharge. • Schedule 16 should incorporate the off-farm discharge as a median increase in water quality and include surface water and groundwater components. • Groundwater parameter should only include NNN. • Discharge limits should be set in comparison to receiving environment e.g. based on median values for receiving water and discharges. • Under this modified option, a reverse sensitivity will occur where outlying discharges inconsistent with the median state of receiving water quality can be identified. This is a sound scientific and statistical approach. • Minimum of 5 years to comply considered appropriate. • Existing areas are not detailed correctly according to ANZECC and insufficient information is provided as to how these have been stipulated.
130	Permitted contaminant discharges	Fertiliser - Glossary definition	Amend	Replace with the following definition: "Fertiliser - a) means a substance or biological compound or mix of substances or biological compounds that is described as, or held out to be suitable for, sustaining or increasing the growth, productivity, or quality of plants or, indirectly, animals through the application to plants or soil of - i) nitrogen, phosphorus, potassium, sulphur, magnesium, calcium, chlorine, and sodium as major nutrients; or (ii) manganese, iron, zinc, copper, boron, cobalt, molybdenum, iodine, and selenium as minor nutrients; or (iii) fertiliser additives; and (b) includes nonnutrient attributes of the materials used in fertiliser; but (c) does not include substances that are plant growth regulators that modify the physiological functions of plants"	<ul style="list-style-type: none"> • Aligned to definition used in regulations of the Agricultural and Veterinary Medicines Act, Code of Practice for the Sale of Fertilisers, and Code of Practice of Nutrient Management.
201	General support	Whole plan change (general support)	Amend	Supports the plan change in part, but only if council adopt significant changes. If these changes are not adopted, opposes the plan change.	<ul style="list-style-type: none"> • Linkage between water quality cause and effect should be evidence-based. • Water quality issues should not be justification for determining or controlling land use.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Policy should be based on a science-informed, risk priority framework. • Implementation, compliance and monitoring should be cost effective. • Implementation should be flexible enough to adapt to each farm. • Policy should empower and encourage self-responsibility, adaptive management and innovation. • Plan should provide certainty to encourage long-term, on-farm decision making and planning. • Section 32 analysis not comprehensive enough, doesn't provide enough information to gauge environmental or financial implications, or sufficient justification for adopted approach. • No Section 32 analysis of how the regime may be put into practice, no data or scenarios given, or cases or models presented, thus no certainty. • No detailed Section 32 analysis of other methods.
243	Bed disturbance	Chapter 13 - general requests	Amend	Amend Rule 13.1.2 to ensure appropriate inclusion Regionally Significant Wetlands: "13.1.2.1 ...the use of a structure that is fixed in, on, under or over the bed of any lake or river, or Regionally Significant Wetland, is a restricted discretionary activity."	<ul style="list-style-type: none"> • Inclusion of RSWs within the plan change means it is appropriate for these to be included within circumstances falling outside Rule 13.1.1.1 criteria.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Support	Retain current wording.	<ul style="list-style-type: none"> • Reflects the inherent variability in sediment yield from forestry.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Insert a restricted [discretionary] activity standard for activities that are non-compliant with this rule. Review and amend the rule in consultation with the plantation forestry sector to address the concerns	<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

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				expressed in this submission or otherwise delete this rule. 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.	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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Retain current wording.	• Support providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend rule 13.2.1.7B (b, c, f)] to address the concerns expressed [in Reasons].	• Rule overly stringent for plantation forestry. • Need to allow installation of culverts, which require a minimum of over burden depth, usually 1-1.5 times the culvert diameter. It may also need to be 2 or even 3 standard 6 metre long culverts, in deeply incised country. • Rule will increase costs and risks for construction of relatively minor crossings. • Sometimes need to impede the upstream passage of predatory fish in order to protect upstream endangered indigenous fish habitat.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	• 100 m is very stringent compared to other plans, neither achievable or realistic in practice.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	• 100 m is very stringent compared to other plans, neither achievable or realistic in practice.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	• 100 m is very stringent compared to other plans, neither achievable or realistic in practice.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12.	• Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners.
131	Other matters	Minor and consequential changes	Amend	Seek such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	• As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	Make the changes outlined in other submission points.	• Doesn't practically allow for primary production operations, such as forestry. • Not meeting permitted rules becomes prohibited even if all practicable measures have been taken to mitigate remedy or avoid effects. • This plan change will require the forestry industry to comply with unrealistic and unachievable standards.
208	Policy framework	Chapter 7 - general requests	Amend	Amendment to policies as may be required to support relief requested below for rules in Chapter 12.	• Oppose policies as they support stringent permitted and prohibited activity standards contained in Chapter 12.
209	Discharge rules	Chapter 12 - general requests	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	• 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.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	• Support efforts to address contaminants in runoff, drainage and leaching. • Support approach to effects-based management instead of controlling land use activities.
227	Prohibitions	Prohibitions - general requests	Oppose	Remove prohibited activity status from the rules in	• RMA enables people to undertake sustainable activities.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				PPC6A and replace it with restricted discretionary activity standard.	<ul style="list-style-type: none"> • Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed. • Failure to comply will lead to forestry being a prohibited activity.

280 Annie Stuart

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Provide greater clarity as to the terms 'cumulative minor effects' and 'short-term'.	<ul style="list-style-type: none"> • Concerned this will allow for activities such as 'fracking' as short term activities.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	<p>Not sure that 'Section 12.C.2 Restricted discretionary activities: Resource consent required' provides adequate protection against practices that will have significant effects in regulating uptake of large quantities of water, discharge of chemically toxic wastewater, and potentially extensive damage to groundwater and underground water supplies.</p> <p>Object to the rider that: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."</p>	<ul style="list-style-type: none"> • Plan change does not reflect pressure on Otago's water with currently proposed mining.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Oppose	<p>Not sure that 'Section 12.C.2 Restricted discretionary activities: Resource consent required' provides adequate protection against practices that will have significant effects in regulating uptake of large quantities of water, discharge of chemically toxic wastewater, and potentially extensive damage to groundwater and underground water supplies.</p> <p>Object to the rider that: "The Consent Authority is precluded from giving public notification of an application for a resource consent under this rule."</p>	<ul style="list-style-type: none"> • Plan change does not reflect pressure on Otago's water with currently proposed mining.
245	Other matters	Future plan changes	Not Applicable	Would like to have specific reference to the scope of contamination extended beyond agricultural, stormwater and sewage, which seem to be the main through of these changes, to include mining activities.	<ul style="list-style-type: none"> • Plan change does not reflect pressure on Otago's water with currently proposed mining.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1.1	Simplifying and streamlining	Section 7.1 - Introduction	Amend	<p>At the very least Introduction should cover off the points made in the NPSFW;</p> <ul style="list-style-type: none"> • 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. • ORC is required to manage freshwater in an 	<ul style="list-style-type: none"> • 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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				integrated and sustainable way. • Freshwater is valued for a large number of important reasons, which include both use values and intrinsic values.	
2	Simplifying and streamlining	Section 7.2 - Issues in general	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
38	Simplifying and streamlining	Section 7.9 - Anticipated environmental results	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.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Water Plan should be impartial and objective, needs to work for all sectors not just primary production.	<ul style="list-style-type: none"> • Must consider the wide range of both use and intrinsic values. • Rules will affect more than just stated rural landholders. Landholders will feel impacts first but, longterm, wellbeing of all is affected. • High water quality is an asset to visitors, is a marketing advantage and is vital to an economy dependent on tourism.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Plan change should recognise that plantation forestry results in a pulse of sediment every 26-50+ years.	<ul style="list-style-type: none"> Over the long term plantation forestry land use has more positive effects on water quality than negative effects
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	We support the permitted activity status.	<ul style="list-style-type: none"> Support providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Oppose	Delete Rule 13.2.1.7(f) from PC6A.	<ul style="list-style-type: none"> Too stringent for plantation forestry operations in which it is often necessary to install crossing structures to access land. Such a limit on soffit placement is impractical and unnecessary.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend rule to address the concerns [given in the reasons].	<ul style="list-style-type: none"> Rule is overly stringent for plantation forestry operations which often need crossing structures. Need to allow the installation of culverts, which require a minimum of over burden depth. For example, a one meter diameter culvert requires a minimum of 500 mm over burden.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Amend	Delete the word 'maintenance' from Rule 13.3.	<ul style="list-style-type: none"> Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> 100 m is very stringent compared to other plans, neither achievable or realistic in practice.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> 100 m is very stringent compared to other plans, neither achievable nor realistic in practice.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • 100 m is very stringent compared to other plans, neither achievable nor realistic in practice.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amendment to Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12.	<ul style="list-style-type: none"> • Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners.
202	General opposition	Whole plan change (general opposition)	Amend	Substantial modification.	<ul style="list-style-type: none"> • The plan change will require the forestry industry to comply with unrealistic and unachievable standards. • Particular concern: the thresholds for permitted activities and the default prohibited activity status. • Needs substantial modification.
208	Policy framework	Chapter 7 - general requests	Amend	Opposes objectives and policies as they support stringent permitted and prohibited activity standards in Chapter 12.	<ul style="list-style-type: none"> • Supports intent of the objectives.
209	Discharge rules	Chapter 12 - general requests	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> • 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.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	<p>Strongly supports the intent of Plan Change 6A to maintain water quality, or improve it as necessary, through control of contaminants discharging from land to water.</p> <p>Supports the Council's effort to improve water quality in the region, however, the plan change does not practically allow for primary production operations, such as forestry, to continue to operate if permitted activity rules cannot be complied with.</p>	<ul style="list-style-type: none"> • Plan outlines policies and objectives to identify and address declining water quality. • Failure to meet permitted status would lead to prohibition, even when all practicable measures have been taken to avoid, remedy or mitigate adverse environmental effects. • Would result in loss of economic, social and environmental benefits provided by forestry.
227	Prohibitions	Prohibitions - general requests	Oppose	Strongly oppose the use of prohibited activity status.	<ul style="list-style-type: none"> • RMA enables people to undertake sustainable activities. • Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed. • Failure to comply will lead to forestry being a prohibited activity. • insufficient justification for the use of prohibited status and approach is inconsistent with case law authority.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Support	Retain current wording.	<ul style="list-style-type: none"> • Reflects the inherent variability in sediment yield from forestry.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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	<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.

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				programme, and who hold 'Growsafe' certification compliant with the NZ Standard for Management of Agrichemicals (NZS8409:2004).	
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Insert a controlled activity standard for activities that are non-compliant. 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.	<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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Retain current wording.	<ul style="list-style-type: none"> • Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Align rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> • The Bridge section of the manual gives specific guidance on bridge installation.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend rule to address the concerns [given in the reasons] and to be informed by Appendix E: Priority Decisions For Installation of a New In-Stream Structure from Boubee, J. et al 1999. Fish Passage At Culverts - A review, with possible solutions for New Zealand indigenous species 62p.	<ul style="list-style-type: none"> • Rule too stringent for plantation forestry operations. Culvert installation requires minimum overburden depth, usually 1-1.5 times the culvert diameter. It may also need to be 2 or even 3 standard 6 metre long culverts, in deeply incised country. • Rule will increase costs and risks of construction of relatively minor crossings. • Sometimes need to impede the upstream passage of predatory fish in order to protect upstream endangered indigenous fish habitat.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Amend	Delete the word 'maintenance' from Rule 13.3.	<ul style="list-style-type: none"> • Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'. • Maintenance should be permitted.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • 100 m is very stringent compared to other plans, neither achievable or realistic in practice.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • 100 m is very stringent compared to other plans, neither achievable or realistic in practice.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • 100 m is very stringent compared to other plans, neither achievable or realistic in practice.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amendment to Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12.	<ul style="list-style-type: none"> • Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners.
131	Other matters	Minor and consequential changes	Amend	Seek such consequential or other relief as may be required to give effect to the submissions discussed in the submission.	<ul style="list-style-type: none"> • As discussed in other submission points.
202	General opposition	Whole plan change (general opposition)	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> • Doesn't practically allow for primary production operations, such as forestry. • Not meeting permitted rules becomes prohibited even if all practicable measures have been taken to mitigate remedy or avoid effects. • This plan change will require the forestry industry to comply with unrealistic and unachievable standards.
208	Policy framework	Chapter 7 - general requests	Amend	Amendment to policies as may be required to support relief requested 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.
209	Discharge rules	Chapter 12 - general requests	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> • 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.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> • Support efforts to address contaminants in runoff, drainage and leaching. • Support approach to effects-based management instead of controlling land use activities.
227	Prohibitions	Prohibitions - general requests	Oppose	Remove prohibited activity status from the rules in PPC6A and replace it with Controlled Activity status for activities that are non-compliant with Rule, as per MfE's proposed Plantation Forestry NES.	<ul style="list-style-type: none"> • RMA enables people to undertake sustainable activities. • Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed. • Failure to comply will lead to forestry being a prohibited activity.

284 Contact Energy Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
19	Managing effects of land use on	Policy 7.B.1 - Address discharges	Amend	Amend Policy 7.B.1 to read as follows:	<ul style="list-style-type: none"> • Use of broadly defined term 'water' has unintended

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality	and disturbance		"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 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.	effects. <ul style="list-style-type: none"> • 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Amend	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." 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.	<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.
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	Amend	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)" Add to the Glossary the definition of infrastructure taken from S2 of the RMA.	<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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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"> • Not clear where 'water' is located, the point of discharge or re-discharge. • Potential for limits to be applied to initial discharge to water body and subsequent points.
52	Discharge rule framework	Sections 12.A – 12.C - Introduction to discharges of contaminants or water	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.
54.1	Human sewage etc	54.1 Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, other specified contaminants, stormwater and from industrial and trade premises	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.
54.2	Beyond the scope	Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, stormwater and other specified contaminants, and	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	<ul style="list-style-type: none"> • Not clear if hydro structures are industrial or trade premises.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		discharges from industrial and trade premises		infrastructure activities"	
92	Discharge rule framework	12C Note box - How the rules apply	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	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	Amend	Rule 12.C.0.1 should refer to discharges which are "about to enter a fresh water body for the first time".	<ul style="list-style-type: none"> 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	Amend	Rule 12.C.0.3 should refer to effects on land owned by a third party who does not consent to the effect.	<ul style="list-style-type: none"> Rule prohibits irrespective of scale or circumstances. 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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. Rule would include circumstances where rights are held to disturb land owned by a third party.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Amend Table 15.1 to provide explicitly that water is or remains of 'good quality' if it does not/ceases to have a defined characteristic: (i) By reason of its natural characteristics; or (ii) By reason of water flows and/or levels in the catchment being above the mean; or (iii) If the alternative water quality only occurs for short periods (less than one week); or (iv) As a result of necessary bed disturbance works.	<ul style="list-style-type: none"> Same standards apply to most Otago water bodies. 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.
227	Prohibitions	Prohibitions - general requests	Amend	Rules 12.C.0.1 - 12.C.0.4 should be categorised as non-complying activities rather than prohibited activities and be expressed to be subject to the rules in the balance of section 12.C.	<ul style="list-style-type: none"> Absence of reasons for rules suggests insufficient consideration was given to the situations that may or may not apply in a prohibited activity. Uncertain if it accounts for situation of water taken then discharged.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Amend	Add a new discretionary rule as follows: "Notwithstanding Rules 12.C.0.1, 12.C.0.2, 12.C.0.3 and 12.C.0.4., the discharge of water or contaminants from a lawfully established dam is a discretionary activity, providing the principal purpose of the dam is not to enable storage of contaminants."	<ul style="list-style-type: none"> Absence of reasons for rules suggests insufficient consideration was given to the situations that may or may not apply in a prohibited activity. Uncertain if it accounts for situation of water taken then discharged.

285 Oceana Gold (New Zealand) Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	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.
131	Other matters	Minor and consequential changes	Not Applicable	[Seeks any] other relief that gives effect to the concerns raised by OceanaGold.	<ul style="list-style-type: none"> As discussed in other submission points.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Ensure provisions encourage innovation and the development of new technology.	Object to any plan change deters innovation and development of new technology addressing water quality management.
239	Consented contaminant discharges	Consented contaminant discharges - general requests	Not Applicable	<p>That specific exemptions be made for existing discharges, such as those from the Macraes Gold Project;</p> <p>That protection and appropriate weight are given to existing operations such as the Macraes Gold Project, that represent significant investment and that provide significant economic and social benefit to the region.</p>	<ul style="list-style-type: none"> OceanaGold recently obtained consents from ORC for discharges associated with expanded mine. Compliance limits apply after reasonable mixing. OceanaGold objects to any plan change that may risk the operations of Macraes Gold Project.
245	Other matters	Future plan changes	Not Applicable	That any policy changes in respect of discharge of contaminants related to farming activities not be applied on a blanket basis throughout the Water Plan in subsequent plan changes;	<ul style="list-style-type: none"> Concerned the plan change may be applied in later changes to stormwater/industrial and trade premises discharges. OceanaGold objects to any plan change that may risk the operations of the Macraes Gold Project.

286 Cardrona Land Care Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	<p>That the present draft of PC6A be rejected or withdrawn.</p> <p>That the Cardrona Valley catchment be considered on its own basis.</p>	<ul style="list-style-type: none"> Plan change inconsistent with RMA; contrary to sound resource management practice; places water quality objectives above all else such as economic and social wellbeing. Rules are challenging for compliance. Being uncertain, farmers cannot know day-to-day if they are compliant. Uncertain rules are unlawful. Objectives do not address the variety of values that water has. Plan change inconsistent with RMA, NPS and RPS. Inappropriately broadens the applicability of rules. Prohibited activity removes ability for a resource consent on merits and effects of the activity. Inconsistent with RMA S107as doesn't provide for emergencies, exceptional circumstances, discharges that are temporary or associated with maintenance. Assumption that all catchments can be managed the same is flawed and incorrect. Cardrona Valley's unique characteristics have not been taken into account including climate, terrain, natural sediment load, extensive hill country which is impractical to fence. S32 Report does not evaluate each provision for appropriateness, efficiency or effectiveness to achieve the purpose of RMA. Due to lack of time, have not included detailed

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
227	Prohibitions	Prohibitions - general requests	Oppose	Oppose.	<p>comments within this submission, will table at hearing.</p> <ul style="list-style-type: none"> • Prohibited activity removes ability for a resource consent to be made or considered on merits and effects of the activity. • Prohibited status of rules not supported by objectives and policies or adequately assessed in Section 32.

287 Fish and Game (Otago)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Simplifying and streamlining	Section 7.2 - Issues in general	Amend	<p>Seek reinsertion of the Issues and contextual information. If the current issues are not appropriate, then they should be amended, rather than removed.</p> <p>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."</p>	<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.
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
18	Managing effects of land use on water quality	Section 7.B - Policies general	Amend	<p>The addition of the following policy: "7.B.6: Recognise the values of freshwater fish when water is transferred between catchments". 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.</p>	<ul style="list-style-type: none"> • Concerned about disease and the effect on fish genetics of mixing water.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	<p>Amend "good" to "at least good" water quality.</p> <p>Replace "noticeable" with "noticeable effect on relevant water quality standards and/or measurable effect on natural or human use values"</p>	<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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				OR Such other relief that gives effect to the concerns [in submission].	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	Retain policy in its current form.	• Supports proposed policy.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Amend	Would like another "and" criterion at (d): "(d) Cumulative effects."	• Support policy with addition of new matter acknowledging cumulative effects.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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."	• Qualify in relation to Policy 7.B.1, where test is "avoid".
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	Support	Retain the policy.	• Recognition of Ngai Tahu values welcome and necessary.
24	Defining good water quality	Section 7.6 - Policies for the enhancement of water quality	Oppose	Oppose removal from this plan change without evidence that the water quality has improved in these catchments.	• What planning purpose is there in setting goals only to remove them in later plan changes?
34	Managing effects of land use on water quality	Section 7.D - Policies for nitrogen, phosphorus, Escherichia coli and sediment (excluding in human sewage, hazardous wastes and stormwater, and from industrial and trade premises)	Support	Strongly support the intent of this policy.	• Removes the longstanding prior distinction between point and non-point source discharges.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.	• Conditionally support policy if proven to be realistic and effective. • Removing reasonable mixing needs considering along with appropriateness of compliance limits at discharge point. • Hinges on practicality of imposing limits for non-point discharges, and if technical method exists to give it effect and ensure compliance and enforceability.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	Amendments to appropriate plan provisions ensuring relevant consent holders are required to monitor water quality.	• Conditionally support policy, if the "expeditious path" includes monitoring at consent holder's expense.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Support	Retain the policy. 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.	• Important that Plan should incentivise development of new technologies and innovations.
38	Simplifying and streamlining	Section 7.9 - Anticipated environmental results	Oppose	Reinsert the environmental results anticipated.	• These form the main link between the plan and monitoring, and removal is dangerous, unnecessary and counterproductive.
91	Discharge rules	Section 12.C - Other discharges	Amend	If necessary, amend the rules [in 12C] on the basis of technical advice, to ensure workability and enforceability.	• 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Review the workability in a practical sense of this	• Monitoring requirements of 1 and 12 hours after rain may

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				rule, and make amendments to ensure rule is workable and effective.	be difficult, proxy points may be used. <ul style="list-style-type: none"> 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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"> Clarification needed on how to decide on measuring point.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Review the evidential basis for the setting of the limits for nitrogen per hectare and make corresponding changes to address the concerns raised. Add a schedule indicating in which catchments compliance with the application limits is likely to be difficult. Add a provision specifying that nutrient input information be publicly available.	<ul style="list-style-type: none"> Support rule. Would like to see research done that indicates the 30 kgN/ha/yr will result in compliance. May need two limits (for wet and dry), or further limits based on soil type/catchment. 10kg limit in sensitive areas supported. Include a schedule of catchments where limits not easily achievable to guide compliance and monitoring. Re Condition (ii) data about nutrient input - is it publicly available, as would be widely useful to help understand effects of land use.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend the rules, or insert advice notes, to allow for the implementation of the next version of OVERSEER, if it reaches a specified technical threshold. Provide for public access to the nutrient application information used for the running of OVERSEER. Or such other relief that gives effect to [submission].	<ul style="list-style-type: none"> Information supplied to the ORC for running OVERSEER should be public knowledge. Don't limit the process to OVERSEER 6.0 as a version with better quality and accuracy software may come along.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Clarification on the notification level of restricted discretionary consents under this rule, in particular clarify that Fish and Game will be notified as an affected party.	<ul style="list-style-type: none"> Where public notification limited, presumably affected parties still notified. Rule supported only if notification level is for limited notification.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Amend	Clarification on the notification level of restricted discretionary consents under this rule, in particular clarify that Fish and Game will be notified as an affected party.	<ul style="list-style-type: none"> Where public notification limited, presumably affected parties still notified. Rule supported only if notification level is for limited notification.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Retain.	<ul style="list-style-type: none"> Rule is a good policy for public access into wetlands.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	Wishes to see the characteristics include the following measures: (a) The Macroinvertebrate Community Index (MCI). (b) Temperature (c) Periphyton growth "Vegetation is functioning and healthy" may be a better measure [than "stripped bare"].	<ul style="list-style-type: none"> Qualitative definitions hard to understand and enforce. Riparian vegetation is damaged well before being stripped bare.
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Limits for all areas are supported. Compliance date of 31 March 2012 is supported. Pomahaka - this river must be split into upper and	<ul style="list-style-type: none"> Delineation between upper and lower catchments is a concern. Different area values may result in degradation of quality or an acceptance of the status quo, rather than improvement.

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				<p>lower sections, with a boundary at Dusky Falls. The upper Pomahaka should be in Area 4 catchments.</p> <p>Shotover - most if not all of the Shotover should be an Area 4 catchment, accepting that the turbidity in this catchment is exempt.</p> <p>Lake Onslow needs to be in Area 4 catchments it is not a lake prone to eutrophication, or if it is, [submitter] doesn't know about this problem currently. If land use around the lake is about to change such to require it to be in a lower category, this should not be the impetus for changing the standard for this lake.</p> <p>The same applies for any relatively pristine upper catchments within Central and Coastal Otago. Currently the limits may result in a legal lowering of water quality for these catchments. A suggestion would be to have an Area 4 inclusion for all headwater streams in Central Otago, above the line of existing development.</p> <p>CFU needs to be changed to a direct measure of E coli. Public Health South may advise on this.</p>	<ul style="list-style-type: none"> • Further information on other catchments will be provided in formal submission.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Support	Retain as is.	<ul style="list-style-type: none"> • Happy with Schedule as it stands.
131	Other matters	Minor and consequential changes	Not Applicable	For the avoidance of doubt, seeks the general relief of any additional or consequential changes to provisions that give effect to the concerns raised.	<ul style="list-style-type: none"> • As discussed in other submission points.
208	Policy framework	Chapter 7 - general requests	Amend	<p>Would like the addition of this policy section, or such policy that has similar effect:</p> <p>"Policies for public information</p> <p>7.E.1 Provide the public with full information on water quality, including but not limited to the following:</p> <p>(a) Results of water quality monitoring of catchments and subcatchments at regular intervals, including the level of compliance with the permitted activity rules</p> <p>(b) Information on agricultural nutrients that is supplied to the Otago Regional Council as part of compliance with the permitted activity status is to be treated as public information."</p>	<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 AER, the plan needs a policy to link it to water quality monitoring and SOE reporting.
211	Implementation	Compliance, enforcement, education	Not Applicable	<p>That a new Schedule be created for this plan, indicating the methodology that will be used to assess noncompliance with the plan. In particular, it should indicate the following:</p> <p>(a) Methods used to determine the source and direction of discharge</p> <p>(b) The approach used in cases where it cannot be distinguished which individual property that a discharge may be coming from. The ability to jointly prosecute noncompliant properties needs to be an</p>	<ul style="list-style-type: none"> • Clarity about compliance and monitoring required to make plan change effective. • Plan change provides no clearly written, strong direction on how monitoring and compliance will be undertaken. • How plan change will be implemented and monitored, and how compliance staff deal with breaches is a concern. • No evidence provided on feasibility or ensuring rules are enforced and enforceable. • Seems unlikely that existing budget for compliance and monitoring will be sufficient to meet the new requirements

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				option, (c) A list of priority catchments for compliance work. This is substantially the same list as was in Policy 7.6 which has now been removed, and it is also much the same list as in the recent State of the Environment water quality report. The list of streams [in Section 7.6] needs to be sent to compliance for priority enforcement action.	of the plan. • Is a reminder of past policy failures to protect waterways.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Strongly supportive of the intent and philosophy behind this plan change.	• Provisions will improve water quality.
227	Prohibitions	Prohibitions - general requests	Support	Retain [prohibited activity] rules as proposed.	• 12C rules conditionally supported provided they are enforceable, and technically practicable. • Prohibited rules are excellent; good to present them first.
243	Bed disturbance	Chapter 13 - general requests	Amend	Retain these provisions [land use in relation to beds of wetlands]. Include the schedule identifying areas of significant spawning habitat Add rules requiring resource consents as follows: (a) Zone 1: The grazing of the bed of a waterway in the waterways in the schedule will require a consent, presumably as a restricted discretionary activity with the discretion restricted to the issue of fish spawning. The notification level should be limited notification. (b) Zone 2: The erection of any structure in the scheduled waterway will require activity with the discretion restricted to the issue of fish spawning. The notification level should be limited notification. Or in the alternative, insert a new rule requiring that resource consents be required for grazing and the erection of structures in waterways that have significant spawning habitat.	• Stricter rules applied to land use in relation to beds of wetlands are supported. • Information will be supplied to ORC on spawning habitat. • Shapefiles supplied separately for mapping form part of this submission.

288 Paterson Pitts Partners Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Addressing discharge before it enters water	Policy 7.7.5 - Assimilative capacity	Oppose	Oppose.	• "Reasonable mixing" removed from plan as it applies to discharge from land disturbance (e.g. subdivisions), where effects short term and treatment to 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.
91	Discharge rules	Section 12.C - Other discharges	Amend	The rules need to be amended so that the consent process is available.	• Prohibiting is extreme; mitigation cannot achieve a consent; conflicts with RMA.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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	• Rules (i) and (ii) are impossible to comply with. • Prohibiting is extreme; mitigation cannot achieve a consent; conflicts with RMA.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				into Rule 12.C.2.1.	• Consent process must be available.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend 13.2.1.7B (d) to provide that the crossing is capable of passing a 1 in 10 year or 10% AEP (annual exceedence probability) flood event.	<ul style="list-style-type: none"> • Makes a crossing easier as a permitted activity. • "Flood conveyance of the lake or river" vague and unenforceable. • Farmers and contractors often underestimate culvert size for a reasonable flood event • Certainty required for efficiency and effectiveness. • Not economically practical to provide for a flood event greater than 10% AEP.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Rule 13.5.1 (e) should read: "The time necessary to carry out and complete the whole of the work within the wetted bed of the lake or river does not exceed 20 hours (non consecutive) in duration and the works in the wetted area are completed within two weeks of commencement".	<ul style="list-style-type: none"> • Change to Condition (e) makes a crossing easier. • 10 hours (non-consecutive) may be insufficient. • Rule is too open-ended as to total time for completion (non-completed culvert could be left indefinitely).
209	Discharge rules	Chapter 12 - general requests	Amend	That the plan change needs to provide for a specific exemption for existing border dyke and flood irrigation, with at least a 30-year transition period to full compliance.	<ul style="list-style-type: none"> • Difficult for extensive flood and border dyke irrigation, in Central Otago to comply with the limits. • Prohibiting this type of irrigation will have enormous economic impact.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Supports general intent.	<ul style="list-style-type: none"> • Concerned at lack of practical and effective tools for land managers to self measure non-point discharge from their land is a concern, especially relating to groundwater. • Enforcement practicalities are a concern, when limits exceeded • Very difficult to trace to an individual landowner where contaminated groundwater affects surface water.

289 Southern Wood Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Support	Retain current wording.	• Reflects the inherent variability in sediment yield from forestry.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	Support	Retain current wording.	• Forestry sector already undertakes activities following codes of practice and guidelines in order to avoid, remedy or mitigate effects.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage	Amend	Amend the rule to make it more precise or otherwise delete this rule.	• Can't accurately determine if a discharge triggers the rule or not.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		prohibited			
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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. That would be both consistent and aligned with the new Horizons One Plan rules.	<ul style="list-style-type: none"> • Rule is not clear enough and requires specific reference to sediment containment measures.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	Insert a controlled activity standard for activities that are non-compliant. 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.	<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.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Retain current wording.	<ul style="list-style-type: none"> • Support permitted activity providing it is lawfully established, the effects are the same or similar if there is a use change, animal waste is prevented from entering the water body and the structure is maintained.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Align rule with bridge guidance in the NZFOA Forest Road Engineering Manual (2012).	<ul style="list-style-type: none"> • The Bridge section of the manual gives specific guidance on bridge installation.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Amend rule to address the concerns [given in the reasons] and to be informed by Appendix E: Priority Decisions For Installation of a New In-Stream Structure from Boubee, J. et al 1999. Fish Passage At Culverts - A review, with possible solutions for New Zealand indigenous species 62p.	<ul style="list-style-type: none"> • Rule too stringent for plantation forestry operations. Culvert installation requires minimum overburden depth, e.g. 1 m diameter culvert requires a minimum of 500 mm overburden. It may also need to be 2 or even 3 standard 6 metre long culverts, in deeply incised country. Rule will increase costs and risks of construction of relatively minor crossings. • Sometimes need to impede the upstream passage of predatory fish in order to protect upstream endangered indigenous fish habitat.
110	Structures	Section 13.3 - The repair, maintenance, extension, alteration, replacement or reconstruction of a structure	Amend	Delete the word 'maintenance' from Rule 13.3.	<ul style="list-style-type: none"> • Reference to 'maintenance' is inconsistent with Rule 13.1.1.1(c) which states 'the structure is maintained in good repair'. • Maintenance should be permitted.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • 100 m is very stringent compared to other plans, neither achievable nor realistic in practice.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • 100 m is very stringent compared to other plans, neither achievable nor realistic in practice.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	Amend rule to increase the reasonable mixing distance to 250 m.	<ul style="list-style-type: none"> • 100 m is very stringent compared to other plans, neither achievable nor realistic in practice.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amendment to Schedule 15 as may be required to support relief requested in submission on policies and rules in Chapter 12, to be informed by and aligned to the recommendations of the Land and Water Forum.	<ul style="list-style-type: none"> • Recognise the importance of Schedule 15 but oppose the stringent turbidity units and impact these will have on forest owners. • LAWF recommends community consultation when setting limits (catchment by catchment basis).
131	Other matters	Minor and consequential changes	Amend	Seek such consequential or other relief as may be	<ul style="list-style-type: none"> • As discussed in other submission points.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				required to give effect to the submissions discussed in the submission.	
202	General opposition	Whole plan change (general opposition)	Oppose	Make the changes outlined in other submission points.	<ul style="list-style-type: none"> Doesn't practically allow for primary production operations, such as forestry. Not meeting permitted rules become prohibited even if all practicable measures have been taken to mitigate remedy or avoid effects. This plan change will require the forestry industry to comply with unrealistic and unachievable standards.
208	Policy framework	Chapter 7 - general requests	Amend	Amendment to policies as may be required to support relief requested 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.
209	Discharge rules	Chapter 12 - general requests	Amend	Review and amend the permitted activity standards in consultation with the plantation forestry sector to address the concerns discussed in this submission.	<ul style="list-style-type: none"> 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.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Retain the current approach and incorporate changes to address issues identified in submission.	<ul style="list-style-type: none"> Support efforts to address contaminants in runoff, drainage and leaching. Support approach to effects-based management instead of controlling land use activities.
227	Prohibitions	Prohibitions - general requests	Amend	Remove prohibited activity status from the rules in PPC6A and replace it with Controlled Activity status for activities that are non-compliant with Rule, as per MfE's proposed Plantation Forestry NES.	<ul style="list-style-type: none"> RMA enables people to undertake sustainable activities. Prohibitions should only be introduced where there is clear evidence of adverse effects that can't be appropriately managed. Failure to comply will lead to forestry being a prohibited activity.

290 Waitensea Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	The limit of 30 kgN/ha/yr is removed.	<ul style="list-style-type: none"> Results in all border dyking going to spray irrigation. ORC not taken into consideration economic impact.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Allow stock to cross over a stream or water source if on a culvert or bridge - but the bridge should not have to be authorised.	<ul style="list-style-type: none"> Cost and administration problem. Too many consents already.

291 Beaton Family

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> No reason given.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> No reason given.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> No reason given.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	The 10 hour limit to do a quick fix adjacent or within a waterway is a bit tight.	<ul style="list-style-type: none"> No reason given.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Did not specify	Rule 13.5.1.8A (b) seems very prohibiting.	<ul style="list-style-type: none"> Difficult for livestock not to expose soil.
125	Defining good water quality	Schedule 15 - Good quality water	Did not specify	Seeks clarification on the following:	<ul style="list-style-type: none"> The lower Taieri plains have a farming intensity

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> - Shouldn't areas of similar farming use have the same standards proposed? - Which of these standards must we comply with? 	<ul style="list-style-type: none"> compatible with areas of the Lower Clutha but have a different type of classification. The flat areas around Benhar are also designated different from the areas across the river. • Tables are not all in same units. • Unclear which standards we need to comply with.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Did not specify	<ul style="list-style-type: none"> Seeks clarification on the following: - Shouldn't areas of similar farming use have the same standards proposed? - Which of these standards must we comply with? 	<ul style="list-style-type: none"> • The lower Taieri plains have a farming intensity compatible with areas of the Lower Clutha but have a different type of classification. The flat areas around Benhar are also designated different from the areas across the river. • Tables are not all in same units. • Unclear which standards we need to comply with.
209	Discharge rules	Chapter 12 - general requests	Amend	<ul style="list-style-type: none"> Seeks clarification on the following: - Will the pumping of flood waters become a restricted or prohibited activity? - Do we have to be able to pump off flood waters within a specified time? - Will this time be achievable in practice? - Will it become necessary to divert fresh water over land to dilute natural waters within a floodbanked area before pumping i.e. diverting the Contour Channel through the West Taieri Drainage Area before pumping back into Lake Waipori. <p>Large numbers of ducks and swans go directly from farm land to the lakes. They feed on the pasture lands of the Taieri Plains at night and return to Lakes Waipori and Waiholo during the day big flights of them at times of the year. What effect does this have?</p>	<ul style="list-style-type: none"> • Flood may take long time to drain. • Flood water may release an odour, create foams. • May be several days until we can pump flood waters. • Water not back to normal within 12 hours. • Lakes can become muddy with good wind. • Fish and Game should be made to account for effects of game birds.

292 Otago Water Resource User Group (OWRUG)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
91	Discharge rules	Section 12.C - Other discharges	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.

293 Deer Industry New Zealand

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
18	Managing effects of land use on	Section 7.B - Policies general	Amend	The policy should reflect greater diversity in values	<ul style="list-style-type: none"> • Believe policies contained within Section 7 are too broad

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality			and use to accommodate the wider descriptions and intentions under the RMA and the recently released 2011 National Water Management Policy.	in description.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	No decision requested.	<ul style="list-style-type: none"> • Practicalities of fencing (\$12-14 per metre minimum). • Times when compliance severely tested. • Acknowledges rule as a strong principle, but compliance in extensive deer farming in the hill and high country will be challenging at some periods in the seasonal calendar.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Better definition of seasonal muster required.	<ul style="list-style-type: none"> • Deer often moved to accommodate breeding season requirements, management reasons, or in response to adverse events without seasonal qualifier.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary to allow consent to be applied for, considered on a case by case basis.	<ul style="list-style-type: none"> • Prohibited status removes ability to gain resource consent. • Does not appear to be any environmental basis for prohibited status (Section 68 RMA). • Does not provide for emergencies, exceptional circumstances, constraints and management of deer. • Ambiguity around "seasonal muster"

294 Dugald MacTavish

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Are there some pristine locations where more stringent controls are required?	<ul style="list-style-type: none"> • Important existing water quality is protected or enhanced. • Don't let it be permitted for water quality to decline to common standard. • Lag effect with groundwater may be difficult to achieve targets in timeframes. • Difficult to assess impact to groundwater from certain land uses and linking with specific landowners.
201	General support	Whole plan change (general support)	Support	Generally support the proposed plan change but consider some aspects may warrant further consideration.	<ul style="list-style-type: none"> • Section 32 sets out well options available and reasoning. • Proposes clear delineations and timelines for achieving targets.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	The setting of contaminant limits needs to consider the wider assimilation capacity of global level as well as local ecological and social values e.g. for N	<ul style="list-style-type: none"> • Setting limits in broader context helps incorporate costing of activities. • Promotes sustainability of agricultural systems.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and P and perhaps certain chemicals.	<ul style="list-style-type: none"> • May raise questions how to best utilise/dispose additional quantities of nutrients.
244	Alternative approaches	Other approaches	Not Applicable	Don't consider that the ORC should ignore examination of catchment-based load limits as they will help identify sustainable landuse configurations at a catchment level before the horse has bolted.	<ul style="list-style-type: none"> • Role for ORC to promote landuse diversification. • Could be included under "methods other than rules".

295 Neil Smith

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Acknowledge that change is evolutionary but in this case respectfully oppose any changes proposed by ORC.	<ul style="list-style-type: none"> • Irrigation in district has increased production, helped local businesses, increased school rolls. • Nitrogen leaching appears to have stabilised. • Waitaki has never been closed for fishing, except in flood. • Have both spray and border dyke irrigation, border dyke is more cost efficient.

296 Janefield Farm

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Amend	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.	<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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	That Council increases the lead in times for the adoption of Schedule 15 and 16 and ensure that the standards are realistic and achievable.	<ul style="list-style-type: none"> • Believe best practice won't meet requirements. • Far reaching effects on future viability of farming. • How can ORC propose change without knowing impact on sector?
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	That Council increases the lead in times for the adoption of Schedule 15 and 16 and ensure that the standards are realistic and achievable.	<ul style="list-style-type: none"> • Believe best practice won't meet requirements. • Far reaching effects on future viability of farming. • How can ORC propose change without knowing impact on sector?
202	General opposition	Whole plan change (general opposition)	Oppose	<p>Revisit the proposed water plan changes to ensure that while we continue to achieve continued improvement in the state of our water that the plan change will not result in significant economic impacts on all who live in Otago</p> <p>Review its rules and the very short time frame to be able to adjust to these changes.</p>	<ul style="list-style-type: none"> • Changes in plan will impose on ability to farm and make a living is great concern. • More time spent working with farmer and ORC as a team is the real answer to long sustainable water quality change.

297 Clydevale Dairy Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	Amend	<p>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.</p> <p>Identify the relationship between the limits in Schedule 16 (if retained) and the [natural and] human use values.</p>	<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 II 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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. • 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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?
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					discharges is unclear.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend Rule 12.C.1.3, so that it addresses the issue from catchment perspective and provides a more legally correct compliance test.	<ul style="list-style-type: none"> • No flexibility either at catchment level or within individual properties. • N loads need determined/managed on catchment-basis, allowing individuals to better manage their land from economic perspective while avoiding, remedying or mitigating effects. • Concerned about OVERSEER as mechanism for compliance with Rule. Few farmers will be familiar with this approach and no guidance is provided with Rule. • Compliance should be tested on ground rather than modelled. May have legal implication for Council's approach.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Support	Clarify what rules apply to this activity and the status of the activity.	<ul style="list-style-type: none"> • Supported but parts of other rules may make this prohibited. This needs clarified.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> • Unclear how limits in Schedule 16 relate to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> • Unclear how limits in Schedule 16 relate to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend rule by deleting (b) and adding a wider range of factors that Council can consider when assessing an application, in particular social and economic factors.	<ul style="list-style-type: none"> • Schedule 16 limits assumed appropriate and can be met in all cases. Not necessarily the case. • Other factors under RMA, such as social and economic wellbeing, efficient use of resources must be considered when non-compliance assessed.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	That this rule be amended to discretionary activity status with ephemeral beds, thalwegs and small streams excluded from the rule.	<ul style="list-style-type: none"> • 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 because definition of 'river' includes any flow channel that may carry water under heavy rain. Stopping stock crossing such land is impractical and does not relate to environmental effects.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Delete schedule or identify more practical and justifiable limits.	<ul style="list-style-type: none"> • Targets overly restrictive; do not reflect natural variations within catchment, so does not reflect practice for SOE monitoring. • No reason given why standards and target dates for compliance selected.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Delete schedule or identify more practical and justifiable limits.	<ul style="list-style-type: none"> • Limits unnecessarily restrictive; no reasons given for limits and how applied. • Limits have no mixing option as a mitigation method, as RMA, NPS and RPS provide for. Approach has no justification. • Uncertain what happens if Schedule not complied with. Providing temporary consents only, while steps taken to reach standards, do not recognise circumstances where other effects or impacts outweigh effects of allowing discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	That the Plan Change in its entirety is withdrawn and the status quo remains OR The relief sought on specific provisions is provided.	<ul style="list-style-type: none"> • ORC not even-handed; dairy farmers singled out while similar infractions from other farming types ignored. • Local authorities repeatedly exceed waste water discharge consents. • Dairy farmers relatively compliant with existing water quality controls.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Plan change places water quality objectives above economic and social wellbeing. This is inconsistent with RMA, NPSFW and RPS. Rules present compliance challenge; many uncertain and inconsistent. Difficult for farmers to know if compliant. No allowance made for reasonable mixing. Qualifiers currently in plan are removed. No apparent ability to assess discharges based on effects. Many of rules are unlawful. S 32 of RMA not complied with, report fails to evaluate appropriateness of objectives or efficiency/effectiveness of policies and rules.

298 Greenfield Farming Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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. Identify the relationship between the limits in Schedule 16 (if retained) and the [natural and] human use values.	<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 II 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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. No qualifier that discharge has to be offensive, objectionable or conspicuous.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					pond? Is there a discharge to water if conduit does not contain water?
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend Rule 12.C.1.3, so that it addresses the issue from catchment perspective and provides a more legally correct compliance test.	<ul style="list-style-type: none"> • No flexibility either at catchment level or within individual properties. • N loads need determined/managed on catchment-basis, allowing individuals to better manage their land from economic perspective while avoiding, remedying or mitigating effects. • Concerned about OVERSEER as mechanism for compliance with Rule. Few farmers will be familiar with this approach and no guidance is provided with Rule. • Compliance should be tested on ground rather than modelled. May have legal implication for Council's approach.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Support	Clarify what rules apply to this activity and the status of the activity.	<ul style="list-style-type: none"> • Supported but parts of other rules may make this prohibited. This needs clarified.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> • Unclear how limits in Schedule 16 relate to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> • Unclear how limits in Schedule 16 relate to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend rule by deleting (b) and adding a wider range of factors that Council can consider when assessing an application, in particular social and economic factors.	<ul style="list-style-type: none"> • Schedule 16 limits assumed appropriate and can be met in all cases. Not necessarily the case. • Other factors under RMA, such as social and economic wellbeing, efficient use of resources must be considered when non-compliance assessed.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	That this rule be amended to discretionary activity status with ephemeral beds, thalwegs and small streams excluded from the rule.	<ul style="list-style-type: none"> • 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 because definition of 'river' includes any flow channel that may carry water under heavy rain. Stopping stock crossing such land is impractical and does not relate to environmental effects.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Delete schedule or identify more practical and justifiable limits.	<ul style="list-style-type: none"> • Targets overly restrictive; do not reflect natural variations within catchment, so does not reflect practice for SOE monitoring. • No reason given why standards and target dates for compliance selected.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for	Oppose	Delete schedule or identify more practical and	<ul style="list-style-type: none"> • Limits unnecessarily restrictive; no reasons given for

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		water quality		justifiable limits.	limits and how applied. <ul style="list-style-type: none"> • Limits have no mixing option as a mitigation method, as RMA, NPS and RPS provide for. Approach has no justification. • Uncertain what happens if Schedule not complied with. Providing temporary consents only, while steps taken to reach standards, do not recognise circumstances where other effects or impacts outweigh effects of allowing discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	That the Plan Change in its entirety is withdrawn and the status quo remains OR The relief sought on specific provisions is provided.	ORC not even-handed; dairy farmers singled out while similar infractions from other farming types ignored. <ul style="list-style-type: none"> • Local authorities repeatedly exceed waste water discharge consents. • Dairy farmers relatively compliant with existing water quality controls. • Plan change places water quality objectives above economic and social wellbeing. This is inconsistent with RMA, NPSFW and RPS. • Rules present compliance challenge; many uncertain and inconsistent. • Difficult for farmers to know if compliant. • No allowance made for reasonable mixing. • Qualifiers currently in plan are removed. • No apparent ability to assess discharges based on effects. • Many of rules are unlawful. • S 32 not complied with, report fails to evaluate appropriateness of objectives or efficiency/effectiveness of policies and rules.

299 Big River Dairy Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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	<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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				discharge is consistent with the purpose of the Act. Identify the relationship between the limits in Schedule 16 (if retained) and the [natural and] human use values.	account of all relevant Part II 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	Support	Ensure policy suite does not limit the consenting of discharges that exceed Schedule 16 to the circumstances of this policy.	• 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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. • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.	• 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Oppose	Delete Rule 12.C.0.4.	• 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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	That this rule be amended to discretionary activity status with clarification/definition around the various terms used within it. Provision must also be made for emergencies, exceptional circumstances, temporary discharges, or discharges associated with maintenance work.	<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?
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Amend Rule 12.C.1.3, so that it addresses the issue from catchment perspective and provides a more legally correct compliance test.	<ul style="list-style-type: none"> No flexibility either at catchment level or within individual properties. N loads need determined/managed on catchment-basis, allowing individuals to better manage their land from economic perspective while avoiding, remedying or mitigating effects. Concerned about OVERSEER as mechanism for compliance with Rule. Few farmers will be familiar with this approach and no guidance is provided with Rule. Compliance should be tested on ground rather than modelled. May have legal implication for Council's approach.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Support	Clarify what rules apply to this activity and the status of the activity.	<ul style="list-style-type: none"> Supported but parts of other rules may make this prohibited. This needs clarified.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> Unclear how limits in Schedule 16 relate to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Provide sound scientific reasoning for limits in Schedule 16.	<ul style="list-style-type: none"> Unclear how limits in Schedule 16 relate to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Amend rule by deleting (b) and adding a wider range of factors that Council can consider when assessing an application, in particular social and	<ul style="list-style-type: none"> Schedule 16 limits assumed appropriate and can be met in all cases. Not necessarily the case. Other factors under RMA, such as social and economic

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				economic factors.	wellbeing, efficient use of resources must be considered when non-compliance assessed.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	That this rule be amended to discretionary activity status with ephemeral beds, thalwegs and small streams excluded from the rule.	<ul style="list-style-type: none"> 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 because definition of 'river' includes any flow channel that may carry water under heavy rain. Stopping stock crossing such land is impractical and does not relate to environmental effects.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Delete schedule or identify more practical and justifiable limits.	<ul style="list-style-type: none"> Targets overly restrictive; do not reflect natural variations within catchment, so does not reflect practice for SOE monitoring. No reason given why standards and target dates for compliance selected.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Delete schedule or identify more practical and justifiable limits.	<ul style="list-style-type: none"> Limits unnecessarily restrictive; no reasons given for limits and how applied. Limits have no mixing option as a mitigation method, as RMA, NPS and RPS provide for. Approach has no justification. Uncertain what happens if Schedule not complied with. Providing temporary consents only, while steps taken to reach standards, do not recognise circumstances where other effects or impacts outweigh effects of allowing discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	That the Plan Change in its entirety is withdrawn and the status quo remains OR The relief sought on specific provisions is provided.	<ul style="list-style-type: none"> ORC not even-handed; dairy farmers singled out while similar infractions from other farming types ignored. Local authorities repeatedly exceed waste water discharge consents. Dairy farmers relatively compliant with existing water quality controls. Plan change places water quality objectives above economic and social wellbeing. This is inconsistent with RMA, NPSFW and RPS. Rules present compliance challenge; many uncertain and inconsistent. Difficult for farmers to know if compliant. No allowance made for reasonable mixing. Qualifiers currently in plan are removed. No apparent ability to assess discharges based on effects. Many of rules are unlawful. S 32 not complied with, report fails to evaluate appropriateness of objectives or efficiency/effectiveness of policies and rules.

300 M W Smith

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Oppose	Oppose.	<ul style="list-style-type: none"> starts to run. • 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Oppose the proposed N loading limits under Rule 12.C.1.3 as they will have a severe impact on my farming operation and are based on an unproven model that has not been peer reviewed.	<ul style="list-style-type: none"> • Limits may prove unworkable unless border dyke replaced with spray system; issues are capital and power costs, reliability of water supply. • Shelter belt removal has animal welfare implication. • Potential for reduction in stock and therefore income. • N-loading model not tested or peer reviewed in Otago. • Blanket approach takes no account of variation in factors. • While easy to administer, it may lead to water quality degradation. • OVERSEER 6.0 yet to be released so not yet known how properties sit for N. • OVERSEER is evolving but subsequent versions not provided for.

301 William John Pile

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	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.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Strongly supports permitted installation of bridges.	<ul style="list-style-type: none"> • Installing bridges improves and protects streams.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Support	Strongly supports permitted installation of culverts.	<ul style="list-style-type: none"> • Installing culverts improves and protects streams. • Was going to have to pay \$3500+ to put in a culvert.
209	Discharge rules	Chapter 12 - general requests	Amend	<p>Leave as it is [any changes to spray irrigation].</p> <p>[Retaining water on property] Have regard to the soil type and look at individual situations.</p>	<ul style="list-style-type: none"> • Millions have been spent on border dyking with great success. • Leave successful irrigation systems as they are. • Are good caretakers of our farms. • Would object to removing shelter trees. • Impossible to meet limits on Waitaki plains in flood situation.

302 Graylands Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Support	Support these changes.	<ul style="list-style-type: none"> • Help keep vehicles and stock out of waterways.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk	Support	Support.	<ul style="list-style-type: none"> • Help keep vehicles and stock out of waterways.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		permitted			
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	13.2.1.7B (b): want amended to; no higher than 3m above the lowest parts. 13.2.1.7B (c): want amended to; does not exceed 15m along the length...	<ul style="list-style-type: none"> • Support rule as helps keep vehicles and stock out of waterways. • Crossings of redundant railway formation over streams can be 3 m high, which by being level avoids low points for runoff to occur. • 15 m width allows room for vehicles and stock to cross with less barring of gravel or soil which can occur on narrow crossings. Extra width allows grass buffer to reduce run off for those willing to incur the cost of an extra pipe.
112.2	Bed disturbance - remobilisation	Section 13.5 note box - Alteration of the bed of a lake or river, or of a Regionally Significant Wetland - note	Support	Support.	• If rules regarding alteration of the bed of a lake or river are in one chapter they would be more clear cut to follow.
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	We oppose the change to (f) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	• 100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	We oppose the change to (d) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	• 100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	We oppose the change to (d) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	• 100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	We oppose the change to (d) conspicuous change in colour or visual clarity of water distance being reduced from 250 m to 100 m downstream of activity. We propose retaining the previous rule of 250m.	• 100m condition achievable in larger water bodies but difficult to meet in smaller ones even with mitigation in place.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Support	Support .	• We wish to continue farming.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Support	Support.	We wish to continue farming.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Add (c) Excluding where installing any authorised structure over water would cause considerable environmental disturbance.	• Places exist where stock crossings not practical or feasible to locate or access, e.g. goat track around a mountain.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support your stand that farming is a permitted activity and your aim to improve poor water quality.	No reason given.

303 Allan Kirkland

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					heavy rainfall without having to worry about this as well.

304 Philip, Heather & Geoff Wilson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Oppose	Take into account that after rain stops, the creeks can be unclear for up to 3 days.	• Creeks flowing into our property can be unclear for up to 3 days.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Broaden rule to encourage culverts or pipe bridges to be permitted.	• Bridges may be the ultimate but if farm needs 10 crossings improved the economics of bridges is impossible e.g. \$5,000 -10,000 for culvert/pipe bridge vs. \$40,000 - 50,000 for costly bridge.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Oppose	Unfair to strike standards that the community as a whole cannot meet.	• Mosgiel discharging stormwater and sewage into the Silverstream, in times of heavy rain, so unfair to strike these standards
236	Implementation	Transition times	Amend	Please give us more time. We need a fair and balanced approach. This should be considered on a case-by-case basis.	• Cost of change not able to be financed in the timeframes given. • Already spending over \$50,000/yr on crossings, fencing, water supply systems etc but still have approximately \$500,000 more to spend to comply with current requirements. • Not acceptable to put us out of business with the plan change.
244	Alternative approaches	Other approaches	Not Applicable	If ORC wants better quality water, provide us with a decent service for the rates we pay.	• Due to poor maintenance of West Taieri drains, water can pond for 30 days after heavy rain, making farming difficult.

305 Andrea Clarke

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	Amend	Rule 12.B.1.5 (a) needs to be clearly defined in additional supporting information or the appendix of the plan.	• To ensure landowners have clear understanding of what is required to implement rule and meet their obligations.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Support	Support.	• Rule is clear statement that effluent systems need to be managed effectively.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Support	Support.	• 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.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Identify the number of different catchments within the Otago region all with differing triggers.	• Important to set realistic and appropriate limits to the geographical characteristics of Otago. • Understanding soil systems and nutrient movement, limits achievement of proposed levels of contaminants within timeframe. • Appropriate for ORC to identify the different contaminants that result in decreasing water quality. • Specific limits will maintain existing quality where good or reasonable and help improve where quality poor. • Potential difficulty in identifying individual land use activities that exceed limits - need tools.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Identify the number of different catchments within the Otago region all with differing triggers.	• Important to set realistic and appropriate limits to the geographical characteristics of Otago. • Understanding soil systems and nutrient movement, limits achievement of proposed levels of contaminants

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>within timeframe.</p> <ul style="list-style-type: none"> • Appropriate for ORC to identify the different contaminants that result in decreasing water quality. • Specific limits will maintain existing quality where good or reasonable and help improve where quality poor. • Potential difficulty in identifying individual land use activities that exceed limits - need tools.
208	Policy framework	Chapter 7 - general requests	Amend	Policies need to reflect the current water quality within catchments and work towards improving the quality of waterways that have been identified as fair or poor under the Council's yearly monitoring scheme.	<ul style="list-style-type: none"> • Concerned by difficulty in identifying individual source of pollutants. • Have potential to encourage landowners to consider existing land management practice and ways to deal with pollutants.
209	Discharge rules	Chapter 12 - general requests	Amend	Rules need to reflect the current water quality within catchments and work towards improving the quality of waterways that have been identified as fair or poor under the Council's yearly monitoring scheme.	<ul style="list-style-type: none"> • Concerned by difficulty in identifying individual source of pollutants. • Have potential to encourage landowners to consider existing land management practice and ways to deal with pollutants e.g. Great allowance for climatic conditions and investing in better effluent management systems.
211	Implementation	Compliance, enforcement, education	Not Applicable	<p>Clarify whether there will be a clear guideline for the implementation of the monitoring scheme of these limits to ensure monitoring of land-use activities by Council is fair and reasonable.</p> <p>Clear guidelines for the implementation of these limits.</p>	<ul style="list-style-type: none"> • Potential difficulty in identifying individual land use activities that exceed Schedule 16 limits. • To ensure the monitoring of land-use activities by Council is fair and reasonable.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	Support overall intention of plan change 6A to reduce the contaminates entering waterways from non-point source pollution that result in a reduction of water quality within the Otago region.	<ul style="list-style-type: none"> • Intensification in farming has resulted in increased sediment and nutrients in water.

306 The Director-General of Conservation

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Defining good water quality	Section 7.5/7.A - Objectives	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.
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
18	Managing effects of land use on water quality	Section 7.B - Policies general	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."	<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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				"7.B.7 To ensure good water quality in Otago, and make significant improvements where water quality has deteriorated."	
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	<p>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:</p> <p>(a) Avoiding discharges of contaminants with noticeable effects on natural and human use values; and</p> <p>(b) Allowing discharges of contaminants that cumulatively have 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>	<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 define all these areas with certainty. The areas will be refined prior to the hearing.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	Support	Retain as notified.	<ul style="list-style-type: none"> Gives effect to best practice.
21	Managing effects of land use on water quality	Policy 7.B.3 / 7.7.2 - Considerations for discharge to land	Amend	<p>Retain as notified with (c) amended to read as follows, or to like effect:</p> <p>Actual or potential effects on water bodies and where appropriate coastal water.</p>	<ul style="list-style-type: none"> Gives effect to best practice and the NZCPS 2010.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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".
23	Discharges of water	Policy 7.B.5 - Intercatchment water discharge	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	Support	Retain as notified.	<ul style="list-style-type: none"> Policy gives effect to some RMA section 30 functions.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new	Amend	That 7.D.3 be amended as follows, or to like effect:	<ul style="list-style-type: none"> Current policy doesn't require any consenting of

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		discharges		"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."	discharges that exceed Schedule 16 limits to meet these limits.
55.2	Beyond the scope	Rule 12.B.1.1 / 12.7.1.1 - Herbicide to water discharge permitted	Not Applicable	Retain as notified.	<ul style="list-style-type: none"> • Enables the control of aquatic plants by the application of herbicide.
56.2	Beyond the scope	Rule 12.B.1.2 / 12.7.1.2 - Pesticide (land-based) discharge permitted	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.
57.2	Beyond the scope	Rule 12.B.1.3 / 12.7.1.3 - Herbicide (aerial or land-based) discharge permitted	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.
58.2	Beyond the scope	Rule 12.B.1.4 / 12.7.1.4 - Pesticide (aerial) discharge permitted	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.
60	Beyond the scope	Rule 12.B.1.6 / 12.11.2.1 - Sullage, cooling water, drinking supply, pool discharge permitted	Not Applicable	Retain as publicly notified.	<ul style="list-style-type: none"> • Will ensure water quality is maintained.
62	Beyond the scope	Rule 12.B.1.8 / 12.4.1.1 - Stormwater reticulated discharge permitted	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 (iiia) functions. • 12.B.1.8(d) does not give effect to RMA section 107.
65	Beyond the scope	Rule 12.B.3.1 / 12.4.2.1 - Stormwater discharge restricted discretionary	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.
67	Human sewage etc	Rule 12.B.4.1 - New discretionary trade discharge	Support	Retain as notified.	<ul style="list-style-type: none"> • Discretionary activity status allows thorough assessment.
68	Human sewage etc	Rule 12.B.4.2 - New discretionary other discharge	Support	Retain as notified.	<ul style="list-style-type: none"> • Discretionary activity status allows thorough assessment.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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:	<ul style="list-style-type: none"> • This provision and others under 12.C.0 do not give full effect to RMA S 107. • Odourless/colourless toxins would not be caught.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				is a prohibited activity."	
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	Support	Retain in full as publicly notified.	• Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	Support	Retain in full as publicly notified.	• Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	Support	Retain in full as publicly notified.	• Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Support	Retain in full as publicly notified.	• Give effect to RMA section 107 in combination with the amendment sought to 12.C.0.1.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	<p>That 12.C.1.1 be amended as follows, or to like effect:</p> <p>"The discharge of sediment to water is a permitted activity, providing:</p> <p>(i) After the cessation of rainfall on site, the discharge does not cause either or all of the following effects:</p> <p>(a) Sedimentation; or</p> <p>(b) Any conspicuous change in colour or visual clarity; or</p> <p>(c) Any significant adverse effects on aquatic life.</p> <p>(ii)(a) Any discharge from a site shall not exceed water clarity of 40 nephelometric turbidity units, and/or</p> <p>(ii)(b) More than twelve hours after rain on site any discharge shall not exceed water clarity of 5 nephelometric turbidity units".</p> <p>That 12.C.1.1(ii)b) is rewritten so that it is both effective and applicable during showery days.</p>	<p>• 12.C.1.1(i) is contrary to RMA section 107(1).</p> <p>• 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.</p>
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	<p>That 12.C.1.2 be amended as follows, or to like effect:</p> <p>"The discharge of a contaminant and the concentration of it as listed in Schedule 16 (excluding sediment) to:</p> <p>(i) Water; or</p> <p>(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."</p>	• No reference to the concentration of specified contaminants which are permitted.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>That 12.C.1.3 be amended as follows, or to like effect:</p> <p>"The discharge of nitrogen from land ...</p> <p>(i) From 31 March 2019, calculated nitrogen leaching by Council using OVERSEER version 6.0 or its successor(s) ..."</p>	<p>• Continual updating should be recognised.</p> <p>• Support remainder of provision.</p>
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>That 12.C.1.4 be amended as follows, or to like effect:</p> <p>"The discharge of contaminants from any animal waste system to land, is a permitted activity,</p>	• Contaminants highly likely to cause adverse effect on aquatic ecosystems and should be controlled.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				providing: (a) The discharge occurs more than 50 metres from any bore used to supply water for domestic needs or drinking water for livestock; and (b) There is no discharge onto any other person's property without the other person's agreement; and (c) The discharge occurs more than 50m from any surface water body or coastal water; and (d) There is no discharge of contaminants from any animal waste system either directly or via overland flow or indirectly via soil and subsurface drainage systems to any water body, or coastal water."	
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Support	Retain as publicly notified.	• Gives effect to RMA S 30(1)(c)(iia).
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Amend	That 12.C.1.6 be amended as follows, or to like effect: Notwithstanding Rules 12.C.1.1, 12.C.1.2 and 12.C.1.5, the discharges of water or the concentration of contaminants listed in Schedule 16 from: ...	• Contaminants in Schedule 16 are described by concentration and this needs to be reflected.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	That 12.C.2.1 be amended as follows, or to like effect: The discharge of the quantity of contaminants listed in Schedule 16 to land: (i) Where changes to land management or infrastructure have been unsuccessful in meeting the limits in Schedule 16, and the discharge first occurred prior to 31 March 2012; or (ii) Where the discharge results from a short-term activity with a short-term adverse effect, is a restricted discretionary activity. The matters to which the Council will restrict its discretion are: (a)- (j) (k) Any natural and human use value identified in Schedule 1 for any affected water body (ii) The review of conditions of the resource consent.	• No reference to the concentration of specified contaminants which are permitted. • Contaminants can adversely affect scheduled natural and human use values, and regard should be given to avoiding, remedying or mitigating adverse effect on these.
105	Consented water discharges	Rule 12.C.2.2 - Intercatchment water discharge restricted discretionary	Amend	That 12.C.2.2 be amended as follows, or to like effect: The matters to which the Council will restrict its discretion are: (a)-(k) (l) Any natural and human use value identified in Schedule 1 for any affected water body	• Discharge of water from one catchment to another can adversely affect scheduled natural and human use values, and regard should be given to avoiding, remedying or mitigating adverse effect on these.
106	Bed disturbance - structures and animal waste	Rule 13.1.1.1 - Use of a structure permitted	Support	Retain as notified.	• Gives effect to the Council's statutory functions.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	That 13.2.1.7 be amended as follows, or to like effect: The erection or placement of any single span bridge, over the bed of a lake or river, or any Regionally Significant Wetland, is a permitted	• Prevention of discharge of animal waste should be part of criteria. • Significant aquatic values can be adversely affected by the erection or placement of structures. • The most significant habitats of acutely threatened

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				activity, providing: (a)-(e) (g) Any animal waste will be prevented from entering the water body. (h) The bridge, or its erection or placement, does not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	indigenous freshwater fish should be protected. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.
108	Bed disturbance - crossings	Rule 13.2.1.7A - Boardwalk permitted	Support	Retain as notified.	• Gives effect to Council's statutory functions.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	That 13.2.1.7B be amended as follows, or to like effect: Unless covered by Rule 13.2.1.7 the erection or placement of any crossing in or on the bed of a lake or river, or any Regionally Significant Wetland, is a permitted activity, providing: (a)-(h) (i) Any animal waste will be prevented from entering the water body. (j) Its erection or placement, does not occur in an area identified in Schedule xx - Areas of Significant Aquatic Values as being in Zone 1 or 2 [see submission point 228].	• Prevention of discharge of animal waste should be part of criteria. • Significant aquatic values can be adversely affected by the erection or placement of structures. • The most significant habitats of acutely threatened indigenous freshwater fish should be protected. • Including new Schedule of areas provides greater clarity. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.
111	Bed disturbance - structures and animal waste	Rule 13.3.2.1 - Alteration of a structure restricted discretionary	Amend	That 13.3.2.1 be amended as follows, or to like effect: Except as provided for by Rules 13.3.1.1 and 13.3.1.2, the extension, alteration, replacement or reconstruction of any structure, fixed in, on, under or over the bed of any lake or river, or any Regionally Significant Wetland, is a restricted discretionary activity. In considering any resource consent for the extension, alteration, replacement or reconstruction of any structure in terms of this rule, the Otago Regional Council will restrict the exercise of its discretion to the following: (a) Any adverse effects of the activity on: (i)-(iv) (v) The areas defined in Schedule xx - Areas of Significant Aquatic Values, being in Zone 1 or 2 [see submission point 228] (aa) Any effect on any Regionally Significant Wetland or on any regionally significant wetland value; and (b)-(j); and (k) A financial contribution if the structure is a dam, or for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected; and (l) The review of conditions of the resource consent.; and (m) How any animal waste will be prevented from entering the water body; and	• Inadequately considered and constructed structures have the potential to adversely affect the subject water body and values within it. • Matters the Council would restrict their discretion to are not comprehensive enough. • The most significant habitats of acutely threatened indigenous freshwater fish should be protected. • Including new Schedule of areas provides greater clarity. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
113	Bed disturbance - remobilisation	Rule 13.5.1.1 - Disturbance structures permitted	Amend	That 13.5.1.1 be amended as follows, or to like effect: The disturbance of the bed of any lake or river, or any Regionally Significant Wetland, associated with: (i)-(iii) is a permitted activity, providing: (a) - (h); and (i) Except for activities covered by Rules 13.2.1.5, 13.2.1.6 or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland. (j) Such activities do not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	<ul style="list-style-type: none"> • The physical removal of exotic pest plants should be permitted. • Significant aquatic values can be adversely affected by the erection or placement of structures. • The most significant habitats of acutely threatened indigenous freshwater fish should be protected. • Including new Schedule of areas provides greater clarity. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.
114	Bed disturbance - remobilisation	Rule 13.5.1.2 - Disturbance storm event permitted	Amend	That 13.5.1.2 be amended as follows, or to like effect: The disturbance of the bed of any river for the purpose of clearing any material that has accumulated as a result of a storm event, excluding alluvium, in order to maintain the flood carrying capacity of the bed of the river, is a permitted activity, providing: (a)-(f) (g) Such activities do not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	<ul style="list-style-type: none"> • Significant aquatic values can be adversely affected by clearing material. • The most significant habitats of acutely threatened indigenous freshwater fish should be protected. • Including new Schedule of areas provides greater clarity. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Amend	That 13.5.1.3 be amended as follows, or to like effect: The disturbance or reclamation of, or the deposition of any substance in, on or under, either the bed of any lake or river, or any Regionally Significant Wetland, for the purpose of: (i)-(ii) is a permitted activity providing: (a)-(g) (h) Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland. (i) Such activities do not occur in an area identified in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	<ul style="list-style-type: none"> • The physical removal of exotic pest plants should be permitted. • Significant aquatic values can be adversely affected by reclamation or deposition of materials into waterways. • The most significant habitats of acutely threatened indigenous freshwater fish should be protected. • Including new Schedule of areas provides greater clarity. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.
116	Bed disturbance - remobilisation	Rule 13.5.1.4 - Disturbance reinstatement permitted	Amend	That 13.5.1.4 be amended as follows, or to like effect: The disturbance or reclamation of, or the deposition of any substance in, on or under, the bed of any lake or river, for the purpose of the reinstatement of any bank of a lake or river which has been eroded by a flood event is a permitted activity providing: (a)-(g) (h) Such activities do not occur in an area identified	<ul style="list-style-type: none"> • Significant aquatic values can be adversely affected by reclamation or deposition of materials into waterways. • The most significant habitats of acutely threatened indigenous freshwater fish should be protected. Sensitivity of such areas of habitat varies and so do activities that threaten them. • Including new Schedule of areas provides greater clarity. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				in Schedule "Significant Aquatic Values" as being in Zone 1 or 2 [see submission point 228].	areas will be refined prior to the hearing.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	That 13.5.1.8A be amended as follows, or to like effect: The disturbance of the bed of any lake or river, or any Regionally Significant Wetland, by livestock, other than dairy cows, is a permitted activity, providing it does not: (a) Cause or induce slumping, pugging or erosion; or (b) Expose soil; or (c) Involve feeding out or planting of crops; or (d) Increase the colour or reduce the visual clarity of water; or (e) Occur in areas identified in Schedule xx - Areas of Significant Aquatic Values in Zone 1 [see submission point 228]; or (f) Damage habitats of indigenous fauna, or damage indigenous flora, in or the bed of any lake or river, or on any Regionally Significant Wetland. Activities which breach rule are a discretionary activity.	<ul style="list-style-type: none"> • Significant aquatic values can be adversely affected by bed disturbance. • RMA uses the terms "Indigenous" not "New Zealand" • Fonterra have committed to excluding dairy cattle from all "Accord" waterways by 2014. • Significant habitats are located in smaller waterways and lakes. New rule required to recognise this and meet turbidity standards. • The most significant habitats of acutely threatened indigenous freshwater fish should be protected. • Including new Schedule of areas provides greater clarity. • Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	The giving of full effect to the following new definition, or to like effect: Seasonal muster - The seasonal shifting of stock, being 1 shift per season.	<ul style="list-style-type: none"> • Seasonal muster should be defined so all plan users can be aware of their rights and responsibilities.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	The giving of full effect to the following new rule, or to like effect: 13.5.1.8C From 1 July 2014 the disturbance of the bed of any river which is wider than a metre, deeper than 30 cm and flowing all year; and all lakebeds; or any Regionally Significant Wetland, by dairy cows is a discretionary activity. The giving of full effect to the following new rule, or to like effect: 13.5.1.8D From 31 March 2017 the disturbance of the bed of any river, intermittent water body, all lakebeds or any Regionally Significant Wetland by dairy cows is a discretionary activity. Retain 13.5A.0.1 as publicly notified. The giving of full effect to the following new definition, or to like effect: Seasonal muster - The seasonal shifting of stock, being 1 shift per season.	<ul style="list-style-type: none"> • Significant aquatic values can be adversely affected by bed disturbance. • Fonterra have committed to excluding dairy cattle from all "Accord" waterways by 2014. • Significant habitats are located in smaller waterways and lakes. New rule required to recognise this and meet turbidity standards. • Stock movements are likely to adversely affect RMA S 6(c) values. • Seasonal muster should be defined so all plan users can be aware of their rights and responsibilities.
126	Defining good water quality	Table 15.1 - Characteristics of good quality water	Amend	That Table 15.1 be amended as follows, or to like effect: Healthy riparian margins: Vegetation functions as an effective buffer of adjoining land use and provides habitat.	<ul style="list-style-type: none"> • A riparian margin with a stubble of vegetation should not be classed as healthy. • Biological activity is characteristic of good water quality.

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				Characteristic: Biological activity Description: Macroinvertebrate activity, measured through the Macroinvertebrate Community Index (MCI). A high MCI score is indicative of a healthy and functioning ecosystem.	
127	Defining good water quality	Table 15.2 - Receiving water standards	Amend	Receiving water Group 1-5 is amended so that the location of where the specified measures of good receiving water quality are to be met are clearly noted. Receiving water Group 4 be amended to include all portions of the regions waterways above 800m asl.	<ul style="list-style-type: none"> No indication in scheduled catchments where any of the specified measures will be met. No certainty they can be accurately measured. Measures in Table 15.2 are therefore contrary to RMA section 35(2)(b). Higher portions of catchments in Otago have better quality than lower sections. Support Table 15.2 subject to amendments.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	All portion of any catchments listed in Schedule 16, Discharge Limit Area 1 above 800m asl are listed in Discharge Limit Area 2.	<ul style="list-style-type: none"> Higher portions of catchments in Otago have better quality than lower sections.
131	Other matters	Minor and consequential changes	Amend	That any consequential amendments to the Plan required to explain or give effect to these changes be made.	<ul style="list-style-type: none"> As discussed in other submission points.
209	Discharge rules	Chapter 12 - general requests	Amend	That 12.3.1.3 be amended as follows, or to like effect: "(d) Mokoreta River from its source to the Otago Regional Council boundary."	<ul style="list-style-type: none"> Currently does not give full effect to the Water Conservation (Mataura River) Order 1997. RMA regional plans must not be inconsistent with water conservation orders.
228	Permitted contaminant discharges	Permitted contaminant discharges - general requests	Amend	Add Schedule xx - Areas with Significant Aquatic Values [see original submission document]. 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.	<ul style="list-style-type: none"> Including new Schedule of areas provides greater clarity. Significant aquatic values can be adversely affected by the erection or placement of structures. The most significant habitats of acutely threatened indigenous freshwater fish should be protected. Not possible, in time given, to define all the water bodies where such significant habitats occur with certainty. The areas will be refined prior to the hearing.

307 Northburn Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	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. 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).	<ul style="list-style-type: none"> 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. Timeframe for compliance is unreasonable due to the large cost for modification of irrigation practices.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	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	<ul style="list-style-type: none"> 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. Timeframe for compliance is unreasonable due to the large cost for modification of irrigation practices.

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				irrigatable areas. 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).	

308 Clutha District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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).

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					"Prior to discharge" can not have environmental effects as it has not been discharged.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

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					<ul style="list-style-type: none"> 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	<p>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.</p> <p>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.</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.

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99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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"> Unclear wording re: turbidity vs. clarity. 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Rule 12.C.1.3 be reworked to provide for catchment loading. Compliance with any nitrogen leaching rules should also be determined by testing rather than modelling. Non-compliance with the OVERSEER values should not found a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved. Or, (b) be deleted and new clauses added providing for discretion over social, economic, and practicality considerations.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Rule be amended to identify conditions that must be breached for the activity to be prohibited, and to provide for use of lawful structures.	<ul style="list-style-type: none"> Rule is based on the activity rather than environmental effects. Use of word 'authorised' implies consent or authorisation - many older structures will have been lawful when installed but have no formal proof of authorisation.
227	Prohibitions	Prohibitions - general requests	Oppose	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.

309 Central Otago District Council & Clutha District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	Amend	Amendments and/or additions to the Objectives are required to give effect to the NPS and RPS to	<ul style="list-style-type: none"> Narrow focus, no recognition of other factors that must be balanced with natural and human use values. Implies

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				achieve the purpose of the Act. In particular, acknowledgement is required that discharges to water support the community's social and economic wellbeing.	any adverse effect on natural and human use values unacceptable, which is inconsistent with Act, NPS, RPS. <ul style="list-style-type: none"> • 'Good water' quality arbitrary, no account of regional variation, fails to implement NPS, RPS. • Section 32 assessment inadequate.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	No decision requested.	<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. • Section 32 assessment inadequate.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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 '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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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 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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					between pre and post 31 March 2012 discharges.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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.	<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.
54.1	Human sewage etc	54.1 Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, other specified contaminants, stormwater and from industrial and trade premises	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Oppose	No decision requested.	<ul style="list-style-type: none"> Section 32 assessment inadequate. Prohibited activity status unjustified and inconsistent with the purpose of the RMA.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Provision for reasonable mixing for discharges under this rule should be incorporated so the rule is consistent with the Act.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Provision be included here, or in the definitions section, so that this rule also permits 'pipe bridges' where water pipes cross over rivers.	<ul style="list-style-type: none"> Would make it easier to use such structures and avoid disturbance involved in placing pipes under the bed.
115	Bed disturbance - remobilisation	Rule 13.5.1.3 - Disturbance reclamation, deposition permitted	Support	Support.	<ul style="list-style-type: none"> Will make maintenance work easier to manage without increase in adverse effects.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Oppose.	<ul style="list-style-type: none"> Approach does not reflect scientific practice. Does not reflect natural variation and establishes regime more restrictive than necessary. Targets in Schedule 15 are unlawful. Target dates or compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur.	<ul style="list-style-type: none"> Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
219	Rural water quality strategy	Overall strategic approach	Not Applicable	No decision requested.	<ul style="list-style-type: none"> Agree that water quality is important and needs to be managed carefully but concerned approach taken by the ORC will not achieve the purpose of the Act Approach fails to provide for variations within catchments, social and economic factors, the use of best practicable options and allow for case-by-case assessment of environmental effects.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Proposal is more restrictive than required and imposes significant costs / restrictions on resource users including councils and ratepayers. • Section 32 does not justify the significant cost and restrictions of proposal.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. • Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	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 '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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					between pre and post 31 March 2012 discharges.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Compliance with any nitrogen leaching rules should also be determined by testing rather than modelling.</p>	<ul style="list-style-type: none"> • Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. • No guidance on the data that needs recording. • Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Non-compliance with the OVERSEER values should not found a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	No decision requested.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts where appropriate.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to incorporate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous.	<ul style="list-style-type: none"> Ambiguity around 'seasonal muster'. Inconsistent with the Act. Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> Removes all ability for consent to be granted and scope for case-by-case assessment. Prohibits crossing of stock with no environmental basis. Prohibited status not justified. Does not provide for emergencies or exceptional circumstances. Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Oppose	Oppose.	<ul style="list-style-type: none"> Approach does not reflect scientific practice. Does not reflect natural variation and establishes regime more restrictive than necessary. Targets in Schedule 15 are unlawful. Target dates or compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur.	<ul style="list-style-type: none"> Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					discharged. <ul style="list-style-type: none"> No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented. Council should continue to work with the Deer farming industry to address any remaining issues and develop workable solutions.	<ul style="list-style-type: none"> Uncertainty of rules and compliance with rules. Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. Proposal will increase costs and reduce viability of deer industry. S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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 '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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Objectives and policies do not support prohibited activity status. Section 32 assessment inadequate.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	Rule be amended as follows: <ul style="list-style-type: none"> 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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. 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	Amend	Clarify the relationship between this rule and rule 12.C.0.5.	<ul style="list-style-type: none"> Relationship with rule 12.C.0.5 unclear. Unclear at what point the discharge will be measured.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Amend the timeframe or mechanism to account for catchment dynamics. Delete reference to 'where the discharge is about the enter water' and exchange for 'after reasonable mixing'.	<ul style="list-style-type: none"> No provision for reasonable mixing. Unknown scientific basis is for the 12 hour timeframe.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delete Rule 12.C.1.3; or Rule 12.C.1.3 be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts where appropriate.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to incorporate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous, and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> Ambiguity around 'seasonal muster'. Inconsistent with the Act. Lack of qualifiers narrows applicability.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> Removes all ability for consent to be granted and scope for case-by-case assessment. Prohibits crossing of stock with no environmental basis. Prohibited status not justified. Does not provide for emergencies or exceptional circumstances. Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> Approach does not reflect scientific practice. Does not reflect natural variation and establishes regime more restrictive than necessary. Targets in Schedule 15 are unlawful. Target dates or compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> Uncertainty of rules and compliance with rules. Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.
227	Prohibitions	Prohibitions - general requests	Oppose	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.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Objective needs to recognise variability of water quality and provide for integrated management of	<ul style="list-style-type: none"> Concept of 'good water quality' is arbitrary and unclear.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				resources.	
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. • Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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 '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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	Rule be amended as follows: - Prohibited activity status changed to discretionary.	<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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> - 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"> • 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> • Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. • No guidance on the data that needs recording. • Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. • Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.</p>	<ul style="list-style-type: none"> • The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how the Schedule 16 limits are related to environmental effects.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> • Consent and policy framework assume Schedule 16 limits can be met in all cases. • Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> • Welcomes relaxed approach which will assist water quality. • Bias towards small bridges and no permitted provision for culverts or pipe bridges. • Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts where appropriate.	<ul style="list-style-type: none"> • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical. • Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to incorporate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous, and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates or compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new	Amend	Policy 7.D.3 be amended to provide for consenting	<ul style="list-style-type: none"> Technological developments and innovation should be

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		discharges		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.	encouraged. <ul style="list-style-type: none"> • 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.
54.1	Human sewage etc	54.1 Section 12.7 / 12.B - Discharge of hazardous substances, hazardous wastes, other specified contaminants, stormwater and from industrial and trade premises	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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> Objectives and policies do not support prohibited activity status. Section 32 assessment inadequate.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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</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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				the enter water' and exchange for 'after reasonable mixing'.	
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delete Rule 12.C.1.3; or Rule 12.C.1.3 be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to incorporate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous, and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> Ambiguity around 'seasonal muster'. Inconsistent with the Act. Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so	<ul style="list-style-type: none"> Removes all ability for consent to be granted and scope for case-by-case assessment. Prohibits crossing of stock with no environmental basis. Prohibited status not justified. Does not provide for emergencies or exceptional

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				as to allow consent to be applied for considered on a case by case basis.	circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.	• Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates or compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the fact that dilution and assimilation will occur. Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15 and discharge standards in Schedule 16 allowing for reasonable mixing.	• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	• Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.	• 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Objective needs to recognise variability of water quality and provide for integrated management of resources.	• Concept of 'good water quality' is arbitrary and unclear.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental effects.	• '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.
20	Managing effects of land use on	Policy 7.B.2 / 7.7.1 - Promote	Oppose	Reinstate 'where appropriate' or delete Policy 7.B.2.	• Not consistent with RMA - all relevant factors/effects to

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality	discharge to land			<ul style="list-style-type: none"> 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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>Inconsistent with RMA section 68.</p> <ul style="list-style-type: none"> • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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	<ul style="list-style-type: none"> • Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>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 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> • Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. • No guidance on the data that needs recording. • Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. • Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.</p>	<ul style="list-style-type: none"> • The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	<p>Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.</p>	<ul style="list-style-type: none"> • Consent and policy framework assume Schedule 16 limits can be met in all cases. • Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	<p>Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.</p>	<ul style="list-style-type: none"> • Welcomes relaxed approach which will assist water quality. • Bias towards small bridges and no permitted provision for culverts or pipe bridges. • Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	<p>Rule be amended to have a broader application and provide explicitly for installation of culverts where appropriate.</p>	<ul style="list-style-type: none"> • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Requirement to be no higher than 1.5m is too low. • Rule should provide for culverts and pipe bridges. • Does not recognise practicality of different crossings for different stock types (e.g. beef cattle are nervous and wary).
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to incorporate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	<p>Rule be amended to include qualifiers such as conspicuous and the concept of seasonal muster needs to be clarified.</p> <p>Rule should also provide for sheep to pass through a waterway for the purpose of moving them between locations as they do not cause sufficient adverse environmental effects to warrant inclusion with Rule 13.5.A.0 below.</p>	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	<p>Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.</p> <p>Sheep be specifically excluded from this rule.</p>	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	No decision requested.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates or compliance have no support in objectives or policies..
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine</p>	<ul style="list-style-type: none"> • Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. • No guidance on the data that needs recording. • Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> • Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> • The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> • Consent and policy framework assume Schedule 16 limits can be met in all cases. • Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> • Welcomes relaxed approach which will assist water quality. • Bias towards small bridges and no permitted provision for culverts or pipe bridges. • Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts where appropriate.	<ul style="list-style-type: none"> • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical. • Requirement to be no higher than 1.5m is too low. • Rule should provide for culverts and pipe bridges. • Does not recognise practicality of different crossings for different stock types (e.g. beef cattle are nervous and wary).
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				(background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	more restrictive than necessary. <ul style="list-style-type: none"> • Targets in Schedule 15 are unlawful. • Target dates or compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur. Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

316 Homestead Farm Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. • Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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 '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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> No lawful basis.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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,

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates or compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

317 Rob van Vugt & Sunset Dairy Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<ul style="list-style-type: none"> • Transfers ORC responsibilities under RMA section 30 to individuals and the community.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • What 'effects' require management and how is uncertain. • Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	Rule be amended as follows: <ul style="list-style-type: none"> - Prohibited activity status changed to discretionary. - Rule made subject to subsequent rules providing for discharges. - "Ponding" to refer to water standing for 72 hours. 	<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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				- Provision for emergencies, exceptional circumstances, temporary discharges, or discharges associated with maintenance work.	for case-by-case assessment. <ul style="list-style-type: none"> 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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. 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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 the 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delete Rule 12.C.1.3; or Rule 12.C.1.3 be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> • Welcomes relaxed approach which will assist water quality. • Bias towards small bridges and no permitted provision for culverts or pipe bridges. • Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical. • Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity status.	<ul style="list-style-type: none"> account factors relevant under Part II of the RMA. 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> 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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.

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101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> Ambiguity around 'seasonal muster'. Inconsistent with the Act. Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> Removes all ability for consent to be granted and scope for case-by-case assessment. Prohibits crossing of stock with no environmental basis. Prohibited status not justified. Does not provide for emergencies or exceptional circumstances. Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> Approach does not reflect scientific practice. Does not reflect natural variation and establishes regime more restrictive than necessary. Targets in Schedule 15 are unlawful. Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient</p>	<ul style="list-style-type: none"> Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. No assessment or support in policy framework makes it

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				(background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. <ul style="list-style-type: none"> Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> Uncertainty of rules and compliance with rules. Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

319 Macraes Community Incorporated

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing	Amend	Amend Policy 7.D.2 to provide for the consenting of	<ul style="list-style-type: none"> Schedule 16 limits do not relate to natural or human use

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		discharges		discharges, where land management practices or infrastructure minimise the discharge and best practicable option to achieve Schedule 16 is being utilised.	values in any scientifically coherent way. <ul style="list-style-type: none"> • 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion,	Amend	Delete rule or amend to provide for emergencies,	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		land instability, property damage prohibited		exceptional circumstances, temporary discharges or discharges associated with maintenance and replace prohibited activity status with discretionary activity status.	for case-by-case assessment. <ul style="list-style-type: none"> • 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	Rule be amended as follows: <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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. 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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	<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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				the enter water' and exchange for 'after reasonable mixing'.	
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delete Rule 12.C.1.3; or Rule 12.C.1.3 be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> Ambiguity around 'seasonal muster'. Inconsistent with the Act. Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so	<ul style="list-style-type: none"> Removes all ability for consent to be granted and scope for case-by-case assessment. Prohibits crossing of stock with no environmental basis. Prohibited status not justified. Does not provide for emergencies or exceptional

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				as to allow consent to be applied for considered on a case by case basis.	circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	• Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur. Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	• Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

320 Mainland Poultry Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.	• 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Objective needs to recognise variability of water quality and provide for integrated management of resources.	• Concept of 'good water quality' is arbitrary and unclear.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental effects.	• '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.
20	Managing effects of land use on	Policy 7.B.2 / 7.7.1 - Promote	Oppose	Reinstate 'where appropriate' or delete Policy 7.B.2.	• Not consistent with RMA - all relevant factors/effects to

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality	discharge to land			<ul style="list-style-type: none"> 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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>Inconsistent with RMA section 68.</p> <ul style="list-style-type: none"> • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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	<ul style="list-style-type: none"> • Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>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 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.</p>	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	<p>Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.</p>	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	<p>Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.</p>	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	<p>Rule be amended to have a broader application and provide explicitly for installation of culverts.</p>	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Rule should provide for culverts and pipe bridges. • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and	Amend	Objective needs to recognise variability of water	<ul style="list-style-type: none"> • Concept of 'good water quality' is arbitrary and unclear.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		enhance		quality and provide for integrated management of resources.	
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. • Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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 '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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste	Amend	Rule be amended as follows:	<ul style="list-style-type: none"> Includes double ups and inconsistencies e.g. water

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		systems, compost, silage prohibited		<ul style="list-style-type: none"> - 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"> • 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> • Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. • No guidance on the data that needs recording. • Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. • Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.</p>	<ul style="list-style-type: none"> • The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how the Schedule 16 limits are related to

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> • Consent and policy framework assume Schedule 16 limits can be met in all cases. • Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> • Welcomes relaxed approach which will assist water quality. • Bias towards small bridges and no permitted provision for culverts or pipe bridges. • Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical. • Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. • Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land	Oppose	Rule 12.C.0.4 be deleted.	<ul style="list-style-type: none"> • Sediment discharge already dealt with in other rules.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		prohibited			<ul style="list-style-type: none"> • 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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Testing rather than modelling should determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory</p>	<ul style="list-style-type: none"> • Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. • No guidance on the data that needs recording. • Concerned OVERSEER not adequate or appropriate tool for determining leaching rates or compliance. • Is not clear where 30 kg/ha and 10 kg/ha values come from.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> • Has been farming in Kakanui for 15 years and there has not been noticeable deterioration in the quality of the Kakanui River. • 65% of property is in a nitrogen sensitive area, it is unclear how the boundaries were determined. Submitter has drilled in this area and not struck water. • Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful. • Limit of 10kg/ha has potential to reduce, if not destroy economic viability. Provision need to be included to allow such operations to continue.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> • The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> • Consent and policy framework assume Schedule 16 limits can be met in all cases. • Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> • Welcomes relaxed approach which will assist water quality. • Bias towards small bridges and no permitted provision for culverts or pipe bridges. • Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical. • Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				a case by case basis.	• Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing. The timeframes for compliance should also reflect scientific analysis.	• Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies. • Unclear why Kakanui catchment in receiving water group two when consultation suggested it would be in group one.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur. Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing. The timeframes for compliance should also reflect scientific analysis.	• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge. • Not clear why the compliance dates have been selected and whether they relate to scientific analysis. Concerned the dates are arbitrary and compliance will be unachievable.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	• Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.	• 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Objective needs to recognise variability of water quality and provide for integrated management of resources.	• Concept of 'good water quality' is arbitrary and unclear.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental effects.	• '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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> 'Noticeable effects' a new and uncertain term. RMA, NPS and RPS refer to well understood 'offensive' or 'conspicuous' discharges, or provide for reasonable mixing.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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"> • Section 32 assessment inadequate. • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					status. <ul style="list-style-type: none"> Section 32 assessment inadequate.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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. 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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 the 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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delete Rule 12.C.1.3; or Rule 12.C.1.3 be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> • Bridges not always practical. • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical. • Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached to other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • Context within which rules will be applied has changed. • Implications for submitter in relation to municipal waste and stormwater discharge consents. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity status.	<ul style="list-style-type: none"> account factors relevant under Part II of the RMA. 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> 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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> Ambiguity around 'seasonal muster'. Inconsistent with the Act. Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> Removes all ability for consent to be granted and scope for case-by-case assessment. Prohibits crossing of stock with no environmental basis. Prohibited status not justified. Does not provide for emergencies or exceptional circumstances. Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> Approach does not reflect scientific practice. Does not reflect natural variation and establishes regime more restrictive than necessary. Targets in Schedule 15 are unlawful. Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient</p>	<ul style="list-style-type: none"> Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. No assessment or support in policy framework makes it

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				(background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. <ul style="list-style-type: none"> Unclear process where the limits can not be reached to other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> Uncertainty of rules and compliance with rules. Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	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.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	Amend	Delete 'To have individuals and communities'.	<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. Not an integrated approach.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental 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.
20	Managing effects of land use on water quality	Policy 7.B.2 / 7.7.1 - Promote discharge to land	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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing	Amend	Amend Policy 7.D.2 to provide for the consenting of	<ul style="list-style-type: none"> Schedule 16 limits do not relate to natural or human use

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		discharges		discharges, where land management practices or infrastructure minimise the discharge and best practicable option to achieve Schedule 16 is being utilised.	values in any scientifically coherent way. <ul style="list-style-type: none"> • 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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> • 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion,	Amend	Delete rule or amend to provide for emergencies,	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		land instability, property damage prohibited		exceptional circumstances, temporary discharges or discharges associated with maintenance and replace prohibited activity status with discretionary activity status.	for case-by-case assessment. <ul style="list-style-type: none"> • 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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	Rule be amended as follows: <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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. 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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	<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.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				the enter water' and exchange for 'after reasonable mixing'.	
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Delete Rule 12.C.1.3; or Rule 12.C.1.3 be reworked to provide for catchment loading. Testing rather than modelling should also determine compliance with any nitrogen leaching rules. Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.	<ul style="list-style-type: none"> Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. No guidance on the data that needs recording. Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.	<ul style="list-style-type: none"> The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	Oppose in part.	<ul style="list-style-type: none"> Agrees that RSWs need to be carefully managed. Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.	<ul style="list-style-type: none"> Consent and policy framework assume Schedule 16 limits can be met in all cases. Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.	<ul style="list-style-type: none"> Welcomes relaxed approach which will assist water quality. Bias towards small bridges and no permitted provision for culverts or pipe bridges. Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	Rule be amended to have a broader application and provide explicitly for installation of culverts.	<ul style="list-style-type: none"> Provision needs to be made for crossings. However it is not clear what a 'crossing' is. Rule is too restrictive, few crossings would comply making rule impractical. Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> Removing qualifier for conspicuous disturbance reduces applicability. Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> Ambiguity around 'seasonal muster'. Inconsistent with the Act. Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so	<ul style="list-style-type: none"> Removes all ability for consent to be granted and scope for case-by-case assessment. Prohibits crossing of stock with no environmental basis. Prohibited status not justified. Does not provide for emergencies or exceptional

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				as to allow consent to be applied for considered on a case by case basis.	circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	• Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur. Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	• Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	• Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
15	Defining good water quality	Objective 7.5.1 / 7.A.1 - Good quality water	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.	• 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.
16	Defining good water quality	Objective 7.A.2 - Maintain and enhance	Amend	Objective needs to recognise variability of water quality and provide for integrated management of resources.	• Concept of 'good water quality' is arbitrary and unclear.
17	Addressing discharge before it enters water	Objective 7.A.3 - Cumulative effects	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.
19	Managing effects of land use on water quality	Policy 7.B.1 - Address discharges and disturbance	Amend	Amend Policy 7.B.1 to reflect terminology in the Act and to address activities that have identifiable environmental effects.	• '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.
20	Managing effects of land use on	Policy 7.B.2 / 7.7.1 - Promote	Oppose	Reinstate 'where appropriate' or delete Policy 7.B.2.	• Not consistent with RMA - all relevant factors/effects to

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	water quality	discharge to land			<ul style="list-style-type: none"> 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.
22	Consented contaminant discharges	Policy 7.B.4 - Adaptive management and innovation	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.
35	Addressing discharge before it enters water	Policy 7.D.1 - Where discharge limits apply	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.
36	Consented contaminant discharges	Policy 7.D.2 - Consenting of existing discharges	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.
37	Consented contaminant discharges	Policy 7.D.3 - Consenting of new discharges	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"> 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.
93	Prohibited discharges	Rule 12.C.0.1 - Discharge prohibited	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 activity 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.
94	Prohibited discharges	Rule 12.C.0.2 - Effects of discharge prohibited	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.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>Inconsistent with RMA section 68.</p> <ul style="list-style-type: none"> • 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.
95	Prohibited discharges	Rule 12.C.0.3 - Flooding, erosion, land instability, property damage prohibited	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
97	Prohibited discharges	Rule 12.C.0.5 - Animal waste systems, compost, silage prohibited	Amend	<p>Rule be amended as follows:</p> <ul style="list-style-type: none"> - 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.
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	Amend	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	<ul style="list-style-type: none"> • Concerned about practicality of rule, particularly how 'cessation' of rainfall determined and if runoff has resulted from rainfall.

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>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 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.
99	Permitted contaminant discharges	Rule 12.C.1.2 - Schedule 16 contaminants permitted	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.
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	<p>Delete Rule 12.C.1.3; or</p> <p>Rule 12.C.1.3 be reworked to provide for catchment loading.</p> <p>Testing rather than modelling should also determine compliance with any nitrogen leaching rules.</p> <p>Non-compliance with the OVERSEER values should not be the basis of a regulatory consequence in the absence of evidence of a discharge from land to groundwater.</p>	<ul style="list-style-type: none"> • Concerned about legality of using OVERSEER as mechanism for determining compliance with the rule. • No guidance on the data that needs recording. • Is not clear where values come from. The limits should be determined taking into account catchment loadings. Some areas or properties cannot meet these limits. • Non-compliance creates an offence regardless of evidence of a contaminant discharge. Linkage between rule and the relevant discharge needed for the rule to be lawful.
101	Permitted contaminant discharges	Rule 12.C.1.4 - Animal waste permitted	Amend	<p>All the performance standards for discharges from animal waste systems should be included within the same rule to avoid misunderstandings about what needs to be complied with.</p>	<ul style="list-style-type: none"> • The rules are confusing as a number of different rules may apply.
102	Permitted water discharges	Rule 12.C.1.5 - Water to water permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how Schedule 16 limits are related to environmental effects.
103	Permitted water discharges	Rule 12.C.1.6 - Dams and water supply systems permitted	Oppose	<p>Oppose in part.</p>	<ul style="list-style-type: none"> • Agrees that RSWs need to be carefully managed. • Not clear how the Schedule 16 limits are related to environmental effects.
104	Consented contaminant discharges	Rule 12.C.2.1 - Contaminants restricted discretionary	Amend	<p>Rule be amended or a new rule provide for resource consents where (b) cannot be achieved.</p>	<ul style="list-style-type: none"> • Consent and policy framework assume Schedule 16 limits can be met in all cases. • Unclear rule framework regarding how applications that cannot achieve Schedule 16 limits due to technical restraints will be assessed.
107	Bed disturbance - crossings	Rule 13.2.1.7 - Single span bridge permitted	Amend	<p>Rule 13.2.1.7 be amended to provide for installation of culverts and pipe bridges that do not affect the flood carrying capacity of the waterway.</p>	<ul style="list-style-type: none"> • Welcomes relaxed approach which will assist water quality. • Bias towards small bridges and no permitted provision for culverts or pipe bridges. • Bridges not always practical.
109	Bed disturbance - crossings	Rule 13.2.1.7B - Crossing permitted	Amend	<p>Rule be amended to have a broader application and provide explicitly for installation of culverts.</p>	<ul style="list-style-type: none"> • Provision needs to be made for crossings. However it is not clear what a 'crossing' is. • Rule is too restrictive, few crossings would comply making rule impractical.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> • Rule should provide for culverts and pipe bridges.
118	Bed disturbance - livestock	Rule 13.5.1.8A - Disturbance livestock permitted	Amend	Rule be amended to reinstate qualifiers and provision for disturbance in emergencies or exceptional circumstances.	<ul style="list-style-type: none"> • Removing qualifier for conspicuous disturbance reduces applicability. • Does not provide for emergencies or exceptional circumstances.
119	Bed disturbance - livestock	Rule 13.5.1.8B - Disturbance seasonal muster permitted	Amend	Rule be amended to include qualifiers such as conspicuous and to clarify that 'seasonal' refers to mustering required due to seasonal or periodic factors (e.g. Drenching) rather than daily events (such as milking).	<ul style="list-style-type: none"> • Ambiguity around 'seasonal muster'. • Inconsistent with the Act. • Lack of qualifiers narrows applicability.
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend rule to allow stock movement where it does not have adverse effects on water quality, provide for crossing in emergencies or exceptional circumstances and change activity status to discretionary of crossing that may have an effect so as to allow consent to be applied for considered on a case by case basis.	<ul style="list-style-type: none"> • Removes all ability for consent to be granted and scope for case-by-case assessment. • Prohibits crossing of stock with no environmental basis. • Prohibited status not justified. • Does not provide for emergencies or exceptional circumstances. • Ambiguity around what 'seasonal muster' is.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.	<ul style="list-style-type: none"> • Approach does not reflect scientific practice. • Does not reflect natural variation and establishes regime more restrictive than necessary. • Targets in Schedule 15 are unlawful. • Target dates for compliance have no support in objectives or policies.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	<p>The limits should apply after reasonable mixing or be increased to reflect the dilution and assimilation that will occur.</p> <p>Amend Schedules 15 and 16 to reflect properly differentiated statistical models for ambient (background) water quality in Schedule 15, and discharge standards in Schedule 16 allowing for reasonable mixing.</p>	<ul style="list-style-type: none"> • Limits are restrictive, and exacerbated by removal of provision for reasonable mixing. • Rules apply limited prior to discharge which may not be lawful as the RMA controls contaminants that have been discharged. • No assessment or support in policy framework makes it unclear why the limits selected are necessary. A more rigorous assessment and policy framework is necessary. • Unclear process where the limits can not be reached or other effects or impacts outweigh actual or potential effects of allowing the discharge.
202	General opposition	Whole plan change (general opposition)	Oppose	Where the concerns of the submitter cannot be addressed the status quo should remain and PC6A should not be implemented.	<ul style="list-style-type: none"> • Uncertainty of rules and compliance with rules. • Inconsistent with RMA (bias towards environment over economic and social wellbeing), NPS (objectives don't address variety of values that water has) and RPS. • S 32 fails to adequately evaluate each objective and consider most appropriate way to achieve purpose of Act, and establish whether policies / rules are the most efficient and effective way to achieve objectives.

327 Lone Star Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
120	Bed disturbance - livestock	Section 13.5A - Entering onto or passing across the bed of a lake or river, or a Regionally Significant Wetland	Amend	Amend b) excluding seasonal musters any river crossing used less than once per month.	<ul style="list-style-type: none"> • Braided rivers change course after every major rain event, causing crossing places to change as well. • Allowing for seasonal musters is not enough to accommodate stock management and protect the environment. • Need an allowance of one crossing per month for country that is farmed extensively.

328 Peter Rowland

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	To delay the implementation of this rule until further scientific environmental and economic studies are completed.	<ul style="list-style-type: none"> No onsite scientific studies have been carried out. Existing farming operations in sensitive areas will not be able to continue. Large changes in farming operations will be required. OVERSEER Version 6.0 is unknown at this time. What benefit is there/how long would it take to lower Nitrogen levels in the North Otago Volcanic Aquifer. North Otago Volcanic Aquifer is not used for drinking water and discharges to sea.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Reassess the levels set in Schedule 16 to ensure that they are practical and achievable levels.	<ul style="list-style-type: none"> Levels are not achievable and need reassessing.

329 Richard Willams

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Oppose	Recommend the ORC carry out some more indepth studies and report back with more data.	<ul style="list-style-type: none"> Oppose rule relating to nitrogen discharge on Lower Waitaki Plains Insufficient research done on the proper monitoring systems. OVERSEER 6.0 is not available yet. Conversion of borderdyke to spray irrigation generates huge cost and problems with power supply. Nitrate levels on Lower Waitaki Plains are not high, despite the plains being extensively changed.

330 Ronald Sheat

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
202	General opposition	Whole plan change (general opposition)	Oppose	Totally opposed to the water quality plan.	<ul style="list-style-type: none"> No reason given.

331 R & M Borrie Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Permitted contaminant discharges	Rule 12.C.1.3 - Nitrogen loading permitted	Amend	Higher N leaching level - 50 units.	<ul style="list-style-type: none"> Don't believe it to be based on correct data.

332 Graham & Pam Hunter

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
224	Alternative approaches	Fencing	Not Applicable	That sheep and beef farmers do not need to fence off waterways on hill country where stock units (SU) are under 5 SU per acre.	<ul style="list-style-type: none"> Fencing of waterways is unpractical and unworkable on steep hill country. Concerned if there was a plan to have rules requiring fencing.

333 Lake Edge Farms Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Permitted contaminant discharges	Rule 12.B.1.5 / 12.8.1.5 - Fertiliser discharge permitted	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.
96	Prohibited discharges	Rule 12.C.0.4 - Disturbed land prohibited	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.
201	General support	Whole plan change (general)	Support	Support in part Plan Change 6A	<ul style="list-style-type: none"> Water in Otago is getting worse and something needs to

Summary of Decisions Requested (by Submitter) on Proposed Plan Change 6A (Water Quality) to the Regional Plan: Water for Otago (2 June 2012)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		support)			be done but with better timeframe and incentives.
244	Alternative approaches	Other approaches	Not Applicable	Incentives for planting and fencing.	<ul style="list-style-type: none"> • Water in Otago is getting worse and something needs to be done. • Incentive may help achieve change.

334 Alastair Cocks

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Permitted contaminant discharges	Rule 12.C.1.1 - Sediment permitted	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.
125	Defining good water quality	Schedule 15 - Good quality water	Amend	Any standards set must be fair and achievable.	<ul style="list-style-type: none"> • Some standards unable to be met, in part due to natural turbidity of waterways within property. • Support the maintenance of the environment and clean waterways, and our farming practices aim to achieve that. • 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.
128	Permitted contaminant discharges	Schedule 16 - Discharge limits for water quality	Amend	Any standards set must be fair and achievable.	<ul style="list-style-type: none"> • Some standards unable to be met, in part due to natural turbidity of waterways within property. • Support the maintenance of the environment and clean waterways, and our farming practices aim to achieve that. • 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.