

**FURTHER SUBMISSION BY CENTRAL OTAGO WINEGROWERS
ASSOCIATION**

**FRESHWATER PLANNING INSTRUMENT PARTS OF THE PROPOSED
REGIONAL POLICY STATEMENT FOR OTAGO 2021**

30 January 2023

To: Otago Regional Council

Submitter Details

Name	Central Otago Winegrowers Association (COWA)
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Introduction

- 1.1 This is a further submission in support of (or in opposition to) a submission on the following proposed Otago Regional Policy Statement – Freshwater Planning Instrument Parts (the **RPS Freshwater**):
- 1.2 COWA made an original submission on the RPS Freshwater (FPI009).
- 1.3 COWA represents a relevant aspect of the public interest, being an association that advocates for viticultural activities in the Central Otago. Its mission is to connect, enrich and promote Central Otago to strengthen its members, community, and environment for generations to come. COWA connect the local wine industry and community to create unity and build a culture of inclusion, collaboration, diversity, mutual respect and understanding amongst our members. COWA seeks to enrich its members, wine producers, environment and community through proactive best practice, education and knowledge sharing, and supporting ingenuity and expertise. Viticulture is an important economic driver in Otago which supports local employment as well as the social, economic and cultural wellbeing of people and communities.

Submission

- 1.1 This Further Submission is made in support of and in opposition to various original submissions on the RPS Freshwater. The reasons in support/opposition of the original submission, and the decision sought, is set out at **Appendix 1**.

1.2 COWA wish to be heard in support of this submission.

Dated 30 January 2023

A handwritten signature in blue ink, appearing to read 'Simon Peirce', with a large, stylized loop at the end.

Simon Peirce

Counsel for Central Otago Winegrowers Association

Appendix 1: Further Submission

FS#	Submitter Name / Number	Provision	Summary of Decision Requested	Support/ Oppose	Reasons for support or opposition and decision requested
1.	FPI041.014 McArthur Ridge Vineyard Limited and Strath Clyde Water Limited, McArthur Ridge Investment Group Limited and Mount Dunstan Estates Limited	GEN – General submission	There should be greater policy direction in the PORPS in regard to promoting and providing for land and water uses that are efficient, have minimal impact on the environment, and that provide significant economic and social benefits. Viticulture is one example, and other uses could also fall into this category (for example, orchards).	Support	COWA supports this submission which recognises the relatively low impact that viticulture activities have on the environment but which have high value to the primary production and tourism sector. COWA requests the submission be granted .
2.	FPI041.016 McArthur Ridge Vineyard Limited and Strath Clyde Water Limited, McArthur Ridge Investment Group Limited and Mount Dunstan Estates Limited	GEN – General submission	Delete the term “ <i>Agriculture</i> ” and replace with “ <i>primary production</i> ” throughout the whole RPS.	Support	The terms agriculture, food production, primary production and others are used seemingly interchangeably throughout the RPS Freshwater, including as proposed by submitters. Although COWA would meet the definition of agriculture, the term would appear to be too broad to provide meaningful direction. By contrast, food production is too narrow and would exclude viticulture. COWA prefers the reference to primary production. COWA requests the submission be granted .
3.	FPI020.008 Silver Fern Farms Limited	SRMR – Significant resource management issues for the region SRMR-I5	Amend the text under the “Economic” sub-heading to read: Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures, <u>development of water storage and innovation</u> . At the same time other industries, such as tourism that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities	Support	COWA recognises that innovation in water quantity will be required to avoid over-allocation while providing for primary production. For that reason, investment in water storage or other innovation will likely be required and should be enabled. COWA requests the submission be granted .

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			available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities.		
4.	FPI041.001 McArthur Ridge Vineyard Limited and Strath Clyde Water Limited, McArthur Ridge Investment Group Limited and Mount Dunstan Estates Limited	SRMR – Significant resource management issues for the region SRMR-I5	Delete the term “ <i>Agriculture</i> ” and replace with “ <i>primary production</i> ”.	Support	The terms agriculture, food production, primary production and others are used seemingly interchangeably throughout the RPS Freshwater, including as proposed by submitters. Although COWA would meet the definition of agriculture, the term would appear to be too broad to provide meaningful direction. By contrast, food production is too narrow and would exclude viticulture. COWA prefers the reference to primary production. COWA requests the submission be granted .
5.	FPI024.018 DairyNZ Limited	LF-WAI - Te Mana o te Wai LF-WAI-AER2	Amend the wording as follows: The mauri of Otago’s water bodies and their health and well-being is protected.	Support	COWA supports this change as it appears to address a duplication in the objective with the reference to the health and wellbeing of Otago’s waterbodies also included. While it is appreciated that the term Mauri has gained prominence in the NPSFM-2020 there is still a need for clear and consistent language to be adopted in the RPS Freshwater. COWA requests the submission be granted .
6.	FPI041.002 McArthur Ridge Vineyard Limited and Strath Clyde Water Limited, McArthur Ridge Investment Group	LF-VM – Visions and management LF-VM-O2	Amend LF-VM-O2(7)(b) as follows: (b) in the Dunstan, Manuharekia and Roxburgh rohe: (i)... (ii) innovative and sustainable land and water management practices support food agricultural, pastoral, horticultural and viticultural production in the area and reduce discharges of	Support	Reference only to food production is too narrow and does not represent the wide range of economic uses of water that are sought to be enabled in accordance with the NPSFM-2020 Objective. COWA requests the submission be granted .

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	Limited and Mount Dunstan Estates Limited		nutrients and other contaminants to water bodies so that they are safe for human contact...		
7.	FPI043.001 OWRUG	LF-VM – Visions and management LF-VM-O2	<p><u>Water is allocated to the food and fibre sector support sustainable production and the sectors contribution to social and economic wellbeing of the community</u></p> <p>(8) in addition to (1) to (67) above:</p> <p>(ii) innovative and sustainable land and water management practices support food production the food and fibre sector in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p> <p>(iii) sustainable abstraction consistent with NOF values occurs from main stems or groundwater in preference to tributaries where practicable.,</p> <p>(iv) the role of water storage is recognised as being fundamental to the food and fibre sector, and an essential part of meeting the vision as set out in (1) to (7) above.</p> <p><u>(iv) the role of water storage is recognised as being fundamental to the food and fibre sector, and an essential part of meeting the vision as set out in (1) to (7) above.</u></p>	Support (in part)	<p>COWA support the intent of the relief but considers the industry referred ought to be expanded to primary production which have a demonstrated history of sustainable practices and low impact on natural resources with high social and economic benefits to people and communities.</p> <p>COWA requests the submission be granted (in part) subject to replacing the words “<i>food and fibre sector</i>” with “<u>primary production</u>”</p>
8.	FPI026.022 Federated Farmers of New Zealand	LF-VM – Visions and management LF-VM-O2	<p><u>(9) activities associated with the primary sector are recognised as having an important role in the FMU,</u></p> <p>(9)(b)(ii) innovative and sustainable land and water management practices support food production <u>primary production</u> in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p>	Support (in part)	COWA agrees that the primary sector, and indeed all agricultural or viticultural activities have an important role in the management of an FMU. That role is often carried out through consent conditions in which positive steps are taken to maintain or enhance a waterbody, reduce overallocation or restrict discharges of

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					<p>nutrients to water.</p> <p>COWA considers that the importance of that role ought to be explained in greater detail through this objective, including by recognising the positive attributes of particular industries such as viticulture which has a low impact on the land and water resources.</p> <p>COWA request the relief be granted subject to amendments providing greater clarification on the importance of industries to managing FMUs.</p>
9.	FPI026.028 Federated Farmers of New Zealand	LF-FW – Freshwater LF-FW-O8	<p>Amend LF–FW–O8 as follows:</p> <p><i>In Otago’s water bodies and their catchments:</i></p> <p><i>(1) the health of the wai supports the health of the people, and thriving mahika kāi, <u>and the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future.</u></i></p> <p><i>(2) water flow is continuous throughout the whole system</i></p> <p><i>(3) the interconnection of fresh water (including groundwater) and coastal waters is recognised,</i></p> <p><i>(4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and</i></p> <p><i>(5) the significant and outstanding values of Otago’s outstanding water bodies are identified and protected.,</i></p> <p><u><i>(6) sustainable and integrated water allocation and abstraction supports primary production and rural communities</i></u></p>	Support	<p>Consistent with the objective of NPSFM-2020 it is important to recognise the value to be derived from primary production.</p> <p>COWA is neutral to the relief sought at (2).</p> <p>COWA otherwise requests the relief be granted.</p>

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10.	FPI041.009 McArthur Ridge Vineyard Limited and Strath Clyde Water Limited, McArthur Ridge Investment Group Limited and Mount Dunstan Estates Limited	LF-FW-Freshwater LF-FW-M6	Add a new clause <u>3A Enable innovative, efficient and effective uses of water in a manner consistent with the principles and hierarchy of obligations in Te Mana o te Wai.</u>	Support	COWA supports recognition of activities that enable innovation for the purpose of efficient and effective water use. COWA requests the relief be granted .
11.	FPI041.010 McArthur Ridge Vineyard Limited and Strath Clyde Water Limited, McArthur Ridge Investment Group Limited and Mount Dunstan Estates Limited		Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and, after it is made operative. maintain that regional plan to: 5. include limits on resource use that: 4... b. for water bodies that have been identified as over-allocated, provide methods and timeframes for phasing out <u>that over-allocation that optimise reliability of primary allocation, with priority given to water uses that generally:</u> <u>(i) have a small environmental footprint in terms of greenhouse gas emissions, nutrient loss, sediment loss and microbial contaminant loss;</u> <u>ii) use less water per hectare than other uses;</u> <u>(iii) provide greater economic return and associated employment per volume of water used;</u> <u>(iv) are able to use less water at times that coincide with seasonal low flows...</u>	Support	COWA supports the inclusion of objectives, policies, methods and rules in the future land and water regional plan which recognise activities, such as viticulture, which have a low impact on natural resources and an otherwise relatively low environmental footprint. COWA requests the relief be granted .