



**Forest & Bird**

TE REO O TE TAIAO | *Giving Nature a Voice*

3 February 2023

**TO:** Otago Regional Council  
Private Bag 1954, Dunedin 9054.  
Attn: Otago Regional Council Policy Team  
[rps@orc.govt.nz](mailto:rps@orc.govt.nz)

**FROM:** Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird)

**Further submission on Proposed Otago Regional Policy Statement 2021 (Freshwater Planning Instrument components)**

1. This is a further submission on the Freshwater Planning Instrument components of the Proposed Otago Regional Policy Statement 2021.
2. Forest & Bird represents a relevant aspect of the public interest and has an interest greater than the public generally. Forest & Bird is a New Zealand non-governmental conservation organisation representing its members and supporters, and made a submission on the proposed Otago Regional Policy Statement 2021. Forest & Bird's constitutional purpose is:

*To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.*

3. Forest & Bird wishes to be heard in support of this submission, and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.
4. Forest & Bird is concerned that some of the decisions sought would result in loss of freshwater habitats, ecosystems and other values and are inconsistent with the direction provided by the RMA, including the National Policy Statement for Freshwater Management 2020 (NPSFM). Forest & Bird opposes the amendments sought by these submissions.

5. Forest & Bird also supports a number of submissions which seek to amend the pORPS to protect, maintain, and restore freshwater habitats and ecosystems and other matters we raised in our primary submission.
  
6. Forest & Bird's further submissions are set out in the Tables below.

Chelsea McGaw  
Regional Conservation Manager - Otago & Southland  
Te Reo o Te Taio | Royal Forest and Bird Protection Society of New Zealand

Date: 3 February 2023

**Address for service:**

Attn: Chelsea McGaw  
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<b>Support/opposition to overall submissions</b>				
<b>Submitter Number (and name)</b>	<b>Original submission point number</b>	<b>Support OR Oppose</b>	<b><i>The reasons for my support/opposition are:</i></b>	<b><i>I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].</i></b>
FPI002 - Otago Fish & Game Council and the Central South Island Fish & Game Council	Overall submission	Support	Generally support Fish & Game's submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Fish & Game's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
FPI030 - Kai Tahu ki Otago (Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga)	Overall submission	Support	Generally support Kāi Tahu ki Otago / Aukaha submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Kāi Tahu ki Otago / Aukaha submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
FPI032 - Te Runanga O Ngai Tahu	Overall submission	Support	Generally support Te Runanga O Ngai Tahu submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Te Runanga O Ngai Tahu submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief

FPI008 - Greenpeace Aotearoa	Overall submission	Support	Generally support Greenpeace's submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of Greenpeace's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
FPI044 - Director General Of Conservation (Penny Nelson)	Overall submission	Support	Generally support Director General Of Conservation (Penny Nelson)'s submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of the Director General Of Conservation's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
FPI012 - Minister for the Environment	Overall submission	Support	Generally support Minister for the Environment's submission as the relief sought will help to protect and restore water quality, significant water bodies, landscapes, coastal waters, indigenous biodiversity throughout Otago and help give effect to higher order documents such as the NPSFM, NES-F, NZCPS and the RMA.	Seek that the whole of the Minister for the Environment's submission and all relief sought be allowed unless otherwise stated or where they conflict with Forest & Bird's specific relief
FPI031 - Oceana Gold (New Zealand) Ltd	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Oceana Gold's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 of the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief

FPI043 - Otago Water Resources Users Group Inc (OWRUG)	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by OWRUG's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 of the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
FPI016 - Meridian Energy Limited	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Meridian Energy Limited's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
FPI021 - Ballance Agri-Nutrients Ltd (BAN)	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Ballance Agri-Nutrients Ltd's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
FPI025 - Beef+Lamb New Zealand Ltd and Deer Industry New Zealand	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Beef+Lamb New Zealand Ltd and Deer Industry New Zealand's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents,	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief

			for example, the NPSFM, s6 and other provisions in the RMA.	
FPI024 – DairyNZ Limited	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by DairyNZ Limited’s submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird’s specific relief
FPI027 - Contact Energy Ltd	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Contact Energy Ltd’s submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird’s specific relief
FPI014 - Rayonier Matariki Forests	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Rayonier Matariki Forest’s submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird’s specific relief
FPI036 - Otago forestry companies (Port Blakely, Calder	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Otago forestry companies (Port Blakely, Calder Stewart, City Forests,	Seek that the whole submission and all relief sought be disallowed unless otherwise

Stewart, City Forests, Ernslaw One Ltd, and Wenita)			Ernslaw One Ltd, and Wenita) submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	stated or where doing so would conflict with Forest & Bird's specific relief
FPI020 - Silver Fern Farms Ltd	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Silver Fern Farms Ltd's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
FPI017 - Ravensdown Ltd	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Ravensdown Ltd's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
FPI019 - Fonterra Cooperative Group Limited	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Fonterra Cooperative Group Ltd's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief

FPI026 - Federated Farmers of New Zealand	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Federated Farmers of New Zealand's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
FPI013 Transpower	Overall submission	Oppose	Forest & Bird generally opposes the relief sought by Transpower's submission as it would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Otago and be inconsistent with higher order documents, for example, the NPSFM, s6 and other provisions in the RMA.	Seek that the whole submission and all relief sought be disallowed unless otherwise stated or where doing so would conflict with Forest & Bird's specific relief
<b><i>In addition, Forest &amp; Bird seeks specific support/opposition to submission points by chapter detailed below:</i></b>				
<b>SRMR – Significant resource management issues for the region</b>				
<b>Submitter Number (and name)</b>	<b>Original submission point number</b>	<b>Support OR Oppose</b>	<b><i>The reasons for my support/opposition are:</i></b>	<b><i>I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].</i></b>
FPI042 Ngāi Tahu ki Murihiku	FPI047.004	Support	This addition is supported as it is consistent with the NPSFM 2020 which treats the health and well-being of water bodies and freshwater ecosystem as a first order priority rather than a matter to be "balanced".	Seek that this submission point is allowed.

FPI037 Fish & Game	FPI037.006	Oppose in part	Human use can have adverse effects on natural features, natural landscapes and outstanding waterbodies inconsistent with the NPSFM 2020.	Seek that the wording under the heading “Environmental” is disallowed.
FPI012 Minister for the Environment	FPI012.002	Support in part	This is a useful addition to highlight the issues caused by over-allocation.	Subject to further details on final form of relief, seek that this submission point is allowed.
FPI023 Moutere Station Ltd	FPI023.001	Oppose	The proposed amendments are unnecessary and fail to recognise the adverse effects caused by abstraction.	Seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.010	Oppose	This addition fails to recognise that reducing energy consumption rather than solely transitioning to renewables also plays a crucial role in achieving New Zealand’s emission reduction targets.	Seek that this submission point is disallowed.
FPI025 Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.010	Oppose	This deletion is unnecessary.	Seek that this submission point is disallowed.
FPI026 Federated Farmers of New Zealand	FPI026.013	Oppose in part	The amendments downplay the adverse effects caused by stock and fails to recognise the adverse effects they present to water bodies and riparian environments, including inanga spawning habitats. However, reference to the impact of pests is supported.	Seek that this submission point is disallowed but retain reference to adverse effects caused by pest species.

FPI019 Fonterra Co-operative Group Ltd	FPI019.002	Oppose	These amendments are unnecessary.	Seek that this submission point is disallowed.
FPI023 Moutere Station Ltd	FPI023.004	Oppose	These amendments are unnecessary and downplay the adverse effects caused by land-use intensification.	Seek that this submission point is disallowed.
FPI0202 Silver Fern Farms Ltd	FPI020.009	Oppose	Food supply (rather than production) is a human survival need.	Seek that this submission point is disallowed.
FPI007 John Highton	FPI007.002	Support	It is useful to acknowledge the importance of water monitoring.	Seeks that this submission point is allowed.
FPI025 Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.011	Oppose	The description of the NPSFM 2020 is inaccurate.	Seek that this submission point is disallowed.
FPI043 OWRUG	FPI043.022	Oppose	These amendments are unnecessary.	Seek that this submission point is disallowed.
FPI039 Realnz	FPI039.023	Oppose	These amendments are unnecessary.	Seek that this submission point is disallowed.
FPI038 NZSki	FPI038.021	Oppose	These amendments are unnecessary.	Seek that this submission point is disallowed.
FPI026 Federated Farmers of New Zealand	FPI026.012	Oppose	Amending to 'as soon as practicable' brings in scope for work on improving damage to be delayed.	Seek that this submission point is disallowed.
FPI024 DairyNZ Limited	FPI024.011	Oppose	The proposed deletion downplays the adverse effects caused by land-use intensification, particularly intensive winter grazing.	Seek that this submission point is disallowed.

<b>RMIA – Resource management issues of significance to iwi authorities in the region</b>				
<b>Submitter Number (and name)</b>	<b>Original submission point number</b>	<b>Support OR Oppose</b>	<b><i>The reasons for my support/opposition are:</i></b>	<b><i>I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].</i></b>
FPI023 Moutere Station Ltd	FPI023.006	Oppose	The proposed amendments to list particular water bodies are unnecessary, as the activities would all have negative impacts, regardless of which water body it is.	Seek that this submission point is disallowed.
<b>LF-WAI – Te Mana o te Wai</b>				
<b>Submitter Number (and name)</b>	<b>Original submission point number</b>	<b>Support OR Oppose</b>	<b><i>The reasons for my support/opposition are:</i></b>	<b><i>I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].</i></b>
FPI020 Silver Fern Farms Ltd	FPI020.010	Oppose	The proposed amendments do not give effect to the NPSFM.	Seek that this submission point is disallowed
FPI032 Te Rūnanga o Ngāi Tahu	FPI032.014	Support	This gives effect to the NPSFM.	Seek that this submission point is allowed.
FPI027 Contact Energy Limited	FPI027.015	Oppose	The amendments sought are inconsistent with the NPSFM, particularly Te Mana o te Wai.	Seek that this submission point is disallowed
FPI016 - Meridian Energy Limited	FPI016.010	Oppose	The relief sought fails to recognise Te Mana o te Wai, omits other critical aspects of Aotearoa New Zealand's integrated response to climate change (such as making	Seek that this submission point is disallowed

			room for rivers), and is unsuitable sitting in an objective.	
FPI031 – Oceana Gold Ltd	FPI031.003	Oppose	The relief sought fails to recognise Te Mana o te Wai and facilitates the ongoing degradation of freshwater habitats.  The reference to “improve” rather than “restore” in the context of this objective is inconsistent with NPSFM Policy 6.	Seek that this submission point is disallowed
FPI044 – Director-General of Conservation	FPI044.005	Support	The amendments sought are consistent with the NPSFM.	Seek that this submission point is allowed.
FPI025 – Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.014	Oppose	Amendments sought are inconsistent with Te Mana o te Wai.	Subject to further details on final form of relief, seek that this submission point is disallowed.
FPI009 – Central Otago Winegrowers Association	FPI009.003	Oppose	The relief sought fails to recognise Te Mana o te Wai and facilitates the ongoing degradation of freshwater habitats.	Seek that this submission point is disallowed.
FPI019 Fonterra Co-operative Group Ltd	FPI019.004	Oppose	These amendments are unnecessary.	Seek that this submission point is disallowed.
FPI043 OWRUG	FPI043.051	Oppose	The reference to “improve” rather than “restore” in the context of this objective is inconsistent with NPSFM Policy 6.	Seek that this submission point is disallowed.
FPI019 Fonterra Co-operative Group Ltd	FPI019.004	Oppose	The further of expressions of Te Mana o Te Wai are appropriate and do not require removal.	Seek that this submission point is disallowed.

FPI001 Dunedin City Council	FPI001.007	Oppose in part	Sufficient guidance is contained in LF-WAI-P1.	Subject to further details on final form of relief, seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.016	Oppose	The reference to renewable energy as a second order priority is inconsistent with the NPSFM, including Te Mana o Te Wai.	Seek that this submission point is disallowed.
FPI022 Manawa Energy Ltd	FPI022.004	Oppose	Amendments sought are inconsistent the NPSFM.	Seek that this submission point is disallowed.
FPI016 Meridian Energy Ltd	FPI016.011	Oppose	Amendments sought fail to acknowledge there are other key aspects of Aotearoa New Zealand's integrated response to climate change (such as making room for rivers).	Seek that this submission point is disallowed.
FPI016 Meridian Energy Ltd	FPI016.012	Oppose	Amendments sought are inappropriately placed in LF-WAI-PR1	Seek that this submission point is disallowed.
FPI042 Ngāi Tahu ki Murihiku	FPI042.009	Support	Amendments sought give effect to the NPSFM	Seek that this submission point is allowed.f
<b>LF-VM – Visions and management</b>				
<b>Submitter Number (and name)</b>	<b>Original submission point number</b>	<b>Support OR Oppose</b>	<b>There reasons for my support/opposition are:</b>	<b><i>I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].</i></b>
FPI031 – Oceana Gold Ltd	FPI031.006	Oppose	All water bodies should be safe for human contact, whether they are intended for this reason or not.	Seek that this submission point is disallowed
FPI032 Te Rūnanga o Ngāi Tahu	FPI032.018	Support	The relief sought recognises the ecological connections across the region and that significant matters affecting freshwater cannot continue to be deferred.	Seek that this submission point is allowed.

FPI030 Kāi Tahu ki Otago	FPI030.019	Support	The relief sought recognises the ecological connections across the region and that significant freshwater matters cannot continue to be put off.	Seek that this submission point is allowed.
FPI044 Director-General of Conservation	FPI044.007	Support	The relief sought will assist in giving effects to the NPSFM.	Seek that this submission point is allowed.
FPI043 OWRUG	FPI043.001	Oppose	The relief sought is inconsistent with the NPSFM. It ignores the problem of overallocation by addressing the <i>effects</i> , i.e. via water storage, rather than the <i>causes</i> of overallocation.	Seek that this submission point is disallowed.
FPI012 Minister for the Environment	FPI012.004	Support	Relief sought is consistent with the NPSFM.	Seek that this submission point is allowed.
FPI012 Minister for the Environment	FPI012.005	Support	Interim steps are appropriate to facilitate the achievement of NPSFM Policy 11.	Seek that this submission point is allowed.
FPI018 Waka Kotahi	FPI018.001	Oppose	Amendments sought are inconsistent with the NPSFM and unduly weaken the policy direction.	Seek that this submission point is disallowed.
FPI018 Waka Kotahi	FPI018.002	Oppose	Amendments sought are inconsistent with the NPSFM and unduly weaken the policy direction.	Seek that this submission point is disallowed.
FPI044 Director-General of Conservation	FPI044.008	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI044 Director-General of Conservation	FPI044.009	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.

FPI024 DairyNZ Limited	FPI024.019	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI030 Kāi Tahu ki Otago	FPI030.020	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI030 Kāi Tahu ki Otago	FPI030.021	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI030 Kāi Tahu ki Otago	FPI030.022	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI030 Kāi Tahu ki Otago	FPI030.023	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI030 Kāi Tahu ki Otago	FPI030.024	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI016 Meridian Energy Ltd	FPI016.013	Oppose	Amendments sought are inconsistent with s 6 and 7 of the RMA and higher order direction.	Seek that this submission point is disallowed.
FPI031 Oceana Gold Ltd	FPI031.006	Oppose	Amendments sought are inconsistent with s 6 of the RMA.	Seek that this submission point is disallowed.
FPI044 Director-General of Conservation	FPI044.010	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.

FPI043 OWRUG	FPI043.002	Oppose	The relief sought is inconsistent with the NPSFM. It ignores the problem of overallocation by addressing the <i>effects</i> , i.e. via water storage, rather than the <i>causes</i> of overallocation.	Seek that this submission point is disallowed.
FPI044 Director General of Conservation	FPI044.011	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI044 Director General of Conservation	FPI044.012	Support	Amendments sought accord with s 6 of the RMA, and higher order policy direction including the NPSFM.	Seek that this submission point is allowed.
FPI027 Contact Energy Limited	FPI027.019	Oppose	Amendments sought do not give effect to the NPSFM.	Seek that this submission point is disallowed.
FPI025 Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.018	Oppose	Amendments sought do not give effect to the NPSFM.	Seek that this submission point is disallowed.
FPI009 Central Otago Winegrowers Association	FPI009.006	Oppose	Amendments sought do not give effect to the NPSFM, particularly NPSFM Policy 11.	Seek that this submission point is disallowed.
FPI025 Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.020	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI026 Federated Farmers of New Zealand	FPI026.022	Oppose	The amendments are inconsistent with the NPSFM. Amendments seeking deletion of timeframes to achieve outcomes are	Seek that this submission point is disallowed.

			inappropriate as these timeframes need to be included in the RPS.	
FPI026 Federated Farmers of New Zealand	FPI026.023	Oppose	As above.	Seek that this submission point is disallowed.
FPI026 Federated Farmers of New Zealand	FPI026.024	Oppose	As above.	Seek that this submission point is disallowed.
FPI026 Federated Farmers of New Zealand	FPI026.025	Oppose	As above.	Seek that this submission point is disallowed.
<b>LF-FW – Freshwater</b>				
<b>Submitter Number (and name)</b>	<b>Original submission point number</b>	<b>Support OR Oppose</b>	<b>The reasons for my support/opposition are:</b>	<b>Seek that the submission is allowed/disallowed</b>
FPI038 NZSki Ltd	FPI038.012	Oppose in part	Relief sought does not give effect to NPSFM Policy 6. In some instances, recreational access may cause adverse effects on wetlands.	Subject to further details on final form of relief, seek that this submission point is disallowed.
FPI039 Realnz	FPI039.014	Oppose in part	Relief sought does not give effect to NPSFM Policy 6. In some instances, recreational access may cause adverse effects on wetlands.	Subject to further details on final form of relief, seek that this submission point is disallowed.
FPI026 Federated Farmers of New Zealand	FPI026.028	Oppose	Relief sought does not give effect to the NPSFM.	Seek that this submission point is disallowed
FPI031 – Oceana Gold Ltd	FPI031.009	Oppose	There is no criteria for what is classed as 'significant' i.e. significant size, cultural significance, significant health, significant in terms of rarity and so on.	Seek that this submission point is disallowed

FPI031 – Oceana Gold Ltd	FPI031.011	Oppose	Removal of point (2) would result in restoration of hydrological processes not being restored where it is possible to do so.	Seek that this submission point is disallowed
FPI016 Meridian Energy Ltd	FPI016.018	Oppose	Off-stream storage is antithetical to NPSFM Policy 11. It ignores the problem of overallocation by addressing the <i>effects</i> rather than the <i>causes</i> of overallocation.	Seek that this submission point is disallowed.
FPI023 Moutere Station Ltd	FIP023.009	Oppose	Amendments sought are inconsistent with the NPSFM, including NPSFM Policies 7 and 9.	Seek that this submission point is disallowed
FPI037 Fish & Game	FPI037.021	Oppose in part	The relief sought does not adequately reflect the distinctions between ss 6 and 7 of the RMA and Policies 9 and 10 of the NPSFM.	Subject to further details on final form of relief, seek that this submission point is disallowed.
FPI037 Fish & Game	FPI037.015	Oppose	The relief sought does not adequately reflect the distinctions between ss 6 and 7 of the RMA and is inconsistent with NPSFM Policy 9.	Seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.024	Oppose	The relief sought dilutes the policy direction in the NPSFM, does not adequately reflect the distinctions between ss 6 and 7 of the RMA and is inconsistent with NPSFM Policy 9.	Seek that this submission point is disallowed.
FPI016 Meridian Energy Ltd	FPI016.014	Oppose	The amendments sought do not accord with s6 of the RMA and do not give effect to the NPSFM.	Seek that this submission point is disallowed.
FPI031 Oceana Gold Ltd	FPI031.007	Oppose	The amendments sought do not give effect to the NPSFM.	Seek that this submission point is disallowed.

FPI018 Waka Kotahi	FPI018.003	Oppose	The amendments sought are contrary to s 6 of the RMA and higher order direction including the NPSFM.	Seek that this submission point is disallowed.
FPI044 Director-General of Conservation	FPI044.015	Support	Amendments sought are consistent with ss 6 and 7 of the RMA, and higher order direction including the NPSFM.	Seek that this submission point is allowed.
FPI044 Director-General of Conservation	FPI044.016	Support	Amendments sought are consistent with ss 6 and 7 of the RMA, and higher order direction including the NPSFM.	Seek that this submission point is allowed.
FPI035 Wise Response Society	FPI035.012	Support	Amendments sought are consistent with NPSFM Policy 6.	Seek that this submission point is allowed.
FPI033 Fulton Hogan Ltd	FPI033.003	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.025	Oppose	Amendments sought are not appropriately placed within in an objective.	Seek that this submission point is disallowed.
FPI021 Ballance Agri-Nutrients Ltd	FPI021.004	Oppose	Amendments sought are not consistent with the NPSFM.	Seek that this submission point is disallowed.
FPI038 NZSki Ltd	FPI038.011	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI038 RealNZ	FPI039.013	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI020 Silver Fern Farms Ltd	FPI020.017	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI021 Ballance Agri-Nutrients Ltd	FPI021.005	Oppose in part, support in part	Amendments to clause (2) are unsupported as these have the potential to weaken Te Mana o Te Wai. However the reference to “indigenous freshwater species” as opposed to “native fish” is supported as it appropriately reflects NPSFM Policy 9.	Except in relation to relief referring to indigenous freshwater fish, seek that this submission point is disallowed.

FPI023 Moutere Station Ltd	FPI023.010	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.026	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI022 Manawa Energy Ltd	FPI022.006	Oppose	Relief sought is inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI016 Meridian Energy Ltd	FPI016.015	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI031 Oceana Gold Ltd	FPI031.009	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI034 The Fuel Companies	FPI034.002	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI044 Director General of Conservation	FPI044.017	Support	Relief sought is consistent with the NPSFM	Seek that this submission point is allowed.
FPI047 Horticulture New Zealand	FPI047.023	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI022 Manawa Energy Ltd	FPI022.008	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI031 Oceana Gold Ltd	FPI031.011	Oppose	Relief sought is inconsistent with the NPSFM	Seek that this submission point is disallowed.
FPI032 Te Rūnanga o Ngāi Tahu	FPI032.025	Support	Amendment sought give effect to the NPSFM.	Seek that this submission is allowed.
FPI027 Contact Energy Limited	FPI027.029	Oppose	Amendments sought do not give effect to the NPSFM.	Seek that this submission point is disallowed.
FPI013 Transpower	FPI013.003	Oppose	An exception for national significant infrastructure does not reflect the distinctions between ss 6 and 7 of the RMA and is inconsistent with the NPSFM.	Seek that this submission point is disallowed.

FPI044 Director General of Conservation	FPI044.019	Support	Amendments sought will assist plan users by adding clarity.	Seek that this submission point is allowed.
FPI018 Waka Kotahi	FPI018.005	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.030	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI030 Kāi Tahu ki Otago	FPI030.034	Support	Amendments sought are consistent with the NPSFM.	Seek that this submission point is allowed.
FPI016 Meridian Energy Limited	FPI016.017	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI012 Minister for the Environment	FPI012.007	Support	Amendments sought are consistent with the NPSFM.	Seek that this submission point is allowed.
FPI 038 NZSki	FPI038.015	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI039 RealNZ	FPI039.017	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI020 Federated Farmers of New Zealand	FPI020.033	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.031	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI018 Waka Kotahi	FPI018.006	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI044 Director General of Conservation	FPI044.021	Support	Amendment sought give effect to the NPSFM	Seek that this submission point is allowed.
FPI030 Kāi Tahu ki Otago	FPI030.040	Support	Amendments sought give effect to the NPSFM.	Seek that this submission point is allowed.

PI035 Wise Response Society	FPI035.021	Support	Amendments sought give effect to the NPSFM.	Seek that this submission point is allowed.
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<b>LF-LS – Land and soil</b>				
<b>Submitter Number (and name)</b>	<b>Original submission point number</b>	<b>Support OR Oppose</b>	<b>The reasons for my support/opposition are:</b>	<b>Seek that the submission is allowed/disallowed</b>
FPI025 Beef + Lamb New Zealand Ltd and Deer Industry New Zealand	FPI025.044	Oppose in part	Details of specific relief are not included.	Subject to further details on final form of relief, seek that this submission point is disallowed.
FPI027 Contact Energy Limited	FPI027.036	Oppose	Amendments sought are inconsistent with the NPSFM.	Seek that this submission point is disallowed.
FPI044 Director General of Conservation	FPI044.022	Oppose	Amendments sought are consistent with the NPSFM.	Seek that this submission is allowed.