

This is a further submission to the Environmental Protection Authority where the matter relates to request for change to plan where Minister has made a direction under section 142(2) of the Resource Management Act 1991.

The plan change is the Water Permits Plan Change – Plan Change 7 to the Water for Otago: Regional Plan.

Part A: Further submitter details

Name of organisation: <i>(if relevant)</i>	DairyNZ Limited		
Title:	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr <input type="checkbox"/> Other: (Please tick the appropriate title)		
First name of further submitter:	DairyNZ Ltd	Surname of further submitter:	
First name of contact person: <i>(if different to above)</i>	Carina	Surname of contact person: <i>(if different to above)</i>	Ross
Home Ph:		Work Ph:	027 306 3134
Mobile:	027 306 3134		
Email address for service:	Carina.ross@dairynz.co.nz		
Postal Address: <i>(or alternative address for service)</i>	24 Millpond Lane	Postcode:	Lincoln 7608

Part B: Interest

Only persons that come under the following categories may make further submissions.

<p>I am a person representing a relevant aspect of the public interest.</p> <p>The grounds for saying why I come within this category are explained below. <input type="checkbox"/></p>	<p>I am a person who has an interest in the WPPC that is greater than the interest the general public has.</p> <p>The grounds for saying why I come within this category are explained below. <input checked="" type="checkbox"/></p>	<p>I am the local authority <input type="checkbox"/></p>
<p>Please specify the grounds for saying why you come within the category above:</p>		
<p>DairyNZ is making this Further Submission as the industry good organisation representing New Zealand's dairy farmers. DairyNZ therefore has an interest in the proposed plan which is greater than the public generally.</p> <p>DairyNZ is funded by a levy on milksolids and through government investment. Our vision is for New Zealand to have the world's most competitive and responsible dairy farming. DairyNZ's work includes research and development to create practical on-farm tools, leading on-farm adoption of farming within limits, promoting careers in dairying, and advocating for farmers with central and regional government.</p>		

Part C: Do you wish to be heard in support of your further submission?

<p>I do not wish to be heard in support of my further submission <input type="checkbox"/></p>	<p>I wish to be heard in support of my further submission. <input checked="" type="checkbox"/></p> <p>If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input checked="" type="checkbox"/></p>
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Part D: Further submission points

If you require additional space for any question(s) please attach further documents or paper to this further submission form and clearly state your name and the question(s) you are expanding on.

Name of original submitter	Particular parts of the submission you support/oppose <i>Please indicate whole submission or submitter point ID (e.g. 70005)</i>	Are you in support of or in opposition to the particular whole/part of the submission?	What are your reasons for your support or opposition?	Do you seek for the whole/part of the submission to be allowed or disallowed (select one)?
Landpro Limited	<p>71159.01</p> <p>Reject PC7 entirely or: Amend PC7 to introduce a much simpler rule that enables current permits to be effectively exercised as they are currently issued until the new Land and Water Plan is operative. Those permit holders willing and able to lodge their replacement applications before October 2021 should not be prevented from seeking the long-term consents that they need, as many have done already</p>	Support	The proposal is a practicable, reasonable, and workable approach to the renewal of water permits in Otago.	Allow

<p>Central Otago District Council</p>	<p>71178.03</p> <p>If permit replacements are not to be processed under the full range of considerations covered in the current framework during the next few years, then the submitters preference is for existing deemed permits to be extended so they can be considered under the new framework.</p> <p>This could either be done by either:</p> <p>(1) issuing short duration consents under the current water plan rules until the new planning framework is ready; or</p> <p>(2) making compliance with terms of existing permits a permitted activity until the new planning framework is ready; or</p> <p>(3) issuing replacement permits on the same terms as existing permits, as a controlled activity, until the new planning framework is ready.</p>	<p>Support</p>	<p><i>This approach would allow for an alternative interim consenting pathway until the new plan is notified. It would minimise cost for the applicant and reduce the time needed for ORC to process applications for water permits.</i></p>	<p>Allow</p>
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<p>Ministry for the Environment</p>	<p>70034.01</p> <p>Amend Policy 10A.2.3 as shown to remove the non-complying activity exemption: <u>Irrespective of any other policies in this Plan concerning consent duration, only grant new resource consents that replace deemed permits, or resource consents that replace water permits to take and use surface water (including groundwater considered as surface water under policy 6.4.1A (a), (b) and (c) of this Plan) where those water permits expire prior to 31 December 2025, for a duration of no more than six years, except where Rule 10A.3.2.1 applies and:</u></p> <p><u>(a) The activity will have no more than minor adverse effects (including no more than minor cumulative effects) on the ecology and the hydrology of the surface water body (and any connected water body) from which the abstraction is to occur; and</u></p> <p><u>(b) The resource consent</u></p>	<p>Oppose</p>	<p><i>The proposed amendments would lead to a considerable added cost for applicants and could lead to some water uses not being able to renew their water permits. It is not a practical way forward for farmers and growers needing water permits for their irrigation. It would shift resources from making environmental improvements on farm, to making water permits applications.</i></p>	<p>Disallow</p>
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	<u>granted will expire before 31 December 2035.</u>			
Ministry for the Environment	70034.02 Delete Rule 10A.3.2.1	Oppose	<i>The proposed amendments would lead to a considerable added cost for applicants and could lead to some water uses not being able to renew their water permits. It is not a practical way forward for farmers and growers needing water permits for their irrigation. It would shift resources from making environmental improvements on farm, to making water permits applications.</i>	Disallow
Ministry for the Environment	70034.03 Add a new rule that makes any activity that does not meet one or more of the conditions of Rule 10A.3.1.1 a prohibited activity	Oppose	<i>The proposed amendments would lead to a considerable added cost for applicants and could lead to some water uses not being able to renew their water permits. It is not a practical way forward for farmers and growers needing water permits for their irrigation. It would shift resources from making environmental improvements on farm, to making water permits applications.</i>	Disallow

Part E: Signature

Signature of person making further submission or person authorised to sign on behalf of person making further submission. Please note a signature is not required for electronic submissions.

Signature: _____ David Burger _____ Date: 2/10/2020 _____