



Department of Conservation
Te Papa Atawhai

DOCDM-6448071

2nd October 2020

Environmental Protection Agency
Private Bag 63002
WELLINGTON 6140
Attention: Jillian Kennemore
ORCplanchanges@epa.govt.nz

Dear Jillian,

Further Submissions on Plan Change 8

Please find enclosed the further submissions of the Director-General of Conservation / *Tumuaki Ahurei* in respect of the above Plan Change.

Please contact Herb Familton in the first instance if you wish to discuss any of the matters raised in this further submission (hfamilton@doc.govt.nz or 027 5367037).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Herb Familton'.

Herb Familton
Planner
For: Director-General / *Tumuaki Ahurei*

RESOURCE MANAGEMENT ACT 1991

**FORM 6
FURTHER SUBMISSIONS IN SUPPORT OR OPPOSITION TO,
SUBMISSION ON PUBLICLY NOTIFIED
PROPOSED PLAN CHANGE**

Water Plan Change 8 – DISCHARGE MANAGEMENT

Clause 8 of Schedule 1, Resource Management Act 1991

TO: Environmental Protection Agency

FURTHER SUBMISSIONS ON: Plan Change 8 to the Regional Plan: Water for Otago

NAME: Director General of Conservation / *Tumuaki Ahurei*

ADDRESS: RMA Shared Services
Department of Conservation
Private Bag 4715
Christchurch Mail Centre 8140
Attn: Herb Familton
Email: hfamilton@doc.govt.nz
Cell: 0275367037

STATEMENT OF SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION

These are further submissions in support of a submission on the Proposed Plan Change 8.

I, Aaron Fleming / *Kaihautū Matarautaki*, Director, Southern South Island, Queenstown of the Department of Conservation, acting under delegated authority from the Director General of Conservation / *Tumuaki Ahurei*, make the following further submissions in support or opposition to the submissions on Proposed Plan Change 8.

1. **I support or oppose the submissions of** those persons and/ or organisations listed in the second column headed “Submitter Name” of the table in the attached.
2. **The parts of the submission I support or oppose are** identified in the third column headed “Submission”.
3. **The reasons for my support or opposition are** set out under the fifth column headed “Reasons” of the table.
4. **The particular aspect of the Plan that the further submission relates to** are set out in the first column headed “Plan Reference”.

5. In relation to those submissions I support I seek that that submission is allowed.
6. In relation to those submissions I oppose I seek that the part of the submission I oppose is disallowed.
7. I do wish to be heard in support of this submission.
8. If other submitters make similar submissions, I will consider presenting a joint case with them at the hearing.
9. Should the Court consider caucusing and expert conferencing, I am willing to participate.



Aaron Fleming
Operations Director / *Kaihautū Matarautaki*
Operations Manager,
Southern South Island,
Queenstown

Pursuant to delegated authority¹
On behalf of
Lou Sanson
Director-General of Conservation / *Tumuaki Ahurei*
Date: October 2020

¹ Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House / *Whare Kaupapa Atawhai*, 18/32 Manners Street, Wellington 6011.

Director-General of Conservation / *Tumuaki Ahurei*

ORC Plan Change 8: Further Submissions: DISCHARGE MANAGEMENT

DG FURTHER SUBMISSION NUMBER	SUBMITTER NAME / REFERENCE NUMBER	PLAN REFERENCE	SUBMISSION / REFERENCE NUMBER	SUPPORT/ OPOSE	REASONS
3	WAIHOPAI RŪNAKA, TE RŪNANGA O ŌRAKA APARIMA, TE RŪNANGA O AWARUA (Te Ao Marama Inc.) Submitter: 80078	POLICY 7.C.5	Add additional matters to discharge policy, including a preference for land-based discharges. Submission: 80078.10	SUPPORT	The policy provisions assist with decision making on discharges, and give effect to Part II of the Act, The NPS FM (2020) and relevant objectives and policies of the RPS and RPW, particularly giving priority to land discharges.
4	WAIHOPAI RŪNAKA, TE RŪNANGA O ŌRAKA APARIMA, TE RŪNANGA O AWARUA (Te Ao Marama Inc.) Submitter: 80078	POLICY 7.C.12	Add additional matters to discharge policy, including a preference for land-based discharges. Submission: 80078.03	SUPPORT	The policy provisions assist with decision making on discharges, and give effect to Part II of the Act, The NPS FM (2020) and relevant objectives and policies of the RPS and RPW, particularly giving priority to land discharges.
5	TE RŪNANGA O MOERAKI, KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNANGA O ŌTĀKOU AND HOKONUI RŪNANGA (Aukaha Ltd) Submitter: 80059	GENERAL SUBMISSION POINT	NPS FM 2020 requires that freshwater is managed in a way that gives effect to Te Mana o te Wai Submission: 80059.XX (NOT SUMMARISED BUT SEE SECTION 3.3 PAGE 5 SUBMISSION)	SUPPORT	The NPS FM (2020) Objectives and Policies need to be given effect to.

6	TE RŪNANGA O MOERAKI, KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNANGA O ŌTĀKOU AND HOKONUI RŪNANGA (Aukaha Ltd) Submitter: 80059	RULE 14.5.2.1	Add “mahinga kai” to the rule Submission: 80059.29	SUPPORT	This gives effect to Section 8 RMA and NPS FM 2020 Objectives and Policies.
7	OTAGO FISH AND GAME COUNCIL and CENTRAL SOUTH ISLAND FISH AND GAME COUNCIL (FISH AND GAME) Submitter: 80080	RULE 14.5.1.1	Provide a numeric suspended sediment standard to the rule Submission: 80080.25	SUPPORT	A numeric standard and any associated thresholds for any discharges resulting from earthworks is required to give effect with Part II of the Act, and Objectives and Policies of the RPS and RPW and NPS FM 2020; and Without a numeric standard, the potential for discharges of sediment to cause significant adverse effects on aquatic life is high, which would be inconsistent with section 70 RMA.