



**SUBMISSION**

**4 May 2020**

TO

**OTAGO REGIONAL COUNCIL**

SUBMISSION ON

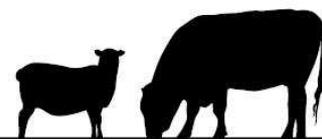
**Proposed Plan Change 7 to the Regional  
Plan: Water for Otago**

BY

**Beef + Lamb New Zealand Ltd**

AND

**Deer Industry New Zealand**



## **SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE REGIONAL PLAN: WATER FOR OTAGO**

Submission on publicly notified proposal for policy statement or plan  
*Clause 6 of First Schedule, Resource Management Act 1991*

To: Proposed Plan Change 7 to the Regional Plan: Water for Otago  
Otago Regional Council  
Private Bag 1954  
Dunedin 9054

Email: [policy@orc.govt.nz](mailto:policy@orc.govt.nz)

Name of submitter: Beef + Lamb New Zealand Limited

Contact person: Lauren Phillips  
Environment Policy Manager, South Island

Address for service: [lauren.phillips@beeflambnz.com](mailto:lauren.phillips@beeflambnz.com)  
PO Box 39085  
Christchurch 8545

And

Name of submitter: Deer Industry New Zealand

Contact Person: Lindsay Fung  
Environmental Stewardship Manager

Address for Service: [lindsay.fung@deernz.org](mailto:lindsay.fung@deernz.org)  
PO Box 10702  
Wellington 6143

Deer Industry New Zealand and Beef + Lamb New Zealand Limited could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that this submission relates to and the decisions sought from Council are as detailed on the following pages. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

Deer Industry New Zealand and Beef + Lamb New Zealand Ltd wish to be heard in support of their submission; and will consider presenting a joint case at hearing with others presenting similar submissions.

## Submission

### A. Introduction

1. Beef + Lamb New Zealand Ltd (B+LNZ) and the Deer Industry New Zealand (DINZ) (collectively referred to forthwith as ‘the submitters’) welcome the opportunity to make a submission on Otago Regional Council’s Plan Change 7 to the Regional Plan: Water for Otago.
2. B+LNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. Its mission is to deliver innovative tools and services to support informed decision making and continuous improvement in market access, product positioning, and farming systems.
3. B+LNZ is actively engaged in environmental issues that affect the pastoral production sector, and in building farmer specific capability and capacity in these areas to ensure that the industry supports an ethos of environmental stewardship, together with a vibrant, resilient, and profitable sector. Maintaining and where degraded enhancing the health of freshwater, aquatic habitats, and biodiversity across the region is important to the people of the Otago region, it is important for our economy, and it is important to farmers.
4. B+LNZ is actively building our work programme throughout the region to support the integrated and sustainable management of land and water resources. B+LNZ is:
  - (i) Working with farmers to develop Land Environment Plans (LEP) through levy funded workshops;
  - (ii) Supporting farmer representatives to engage in the collaborative catchment plan development processes;
  - (iii) Working with the Regional Council to ensure that management frameworks developed through Regional Plans are fit for purpose, and enable flexibility in land use and management practices, while ensuring that environmental issues are addressed in a targeted, efficient and effective way;
  - (iv) Working with Regional Councils to develop Farm Environment Plans / Land Environment Plans which meet the requirements of their regional or unitary plans;
  - (v) Developing and implementing science and extension programmes to help identify, prioritise and implement on farm actions that will make a difference to improving water quality, aquatic habitats, and biodiversity; and
  - (vi) Working with farmer leaders throughout the region to support uptake of farm environment plans and to encourage and support the development of sub catchment approaches to managing water quality

5. DINZ is a levy funded industry-good body established by the Deer Industry New Zealand Regulations (2004) under the Primary Products Marketing Act 1953. Its vision statement is 'To promote and assist the development of the New Zealand deer industry. A strong, stable, profitable industry for all participants.'
6. DINZ's levy payers are producers and processors of venison and velvet. There are roughly 1,500 deer farmers and 8 venison processing plants with approximately one million animals on farms.
7. The deer industry is the youngest pastoral-based industry in New Zealand (the first deer farm licence was issued in 1970) but provides complementary land use, diversified markets and additional revenue to other pastoral farming industries. Indeed about 80% of deer farmers also farm other livestock species.
8. The deer industry has particular affinity with the sheep and beef industry as:
  - (i) Deer farms tend to be multi-species (i.e. deer are farmed along with sheep and/or beef cattle);
  - (ii) products derived from deer farms are similar (venison alongside beef and lamb, annual velvet harvesting alongside wool);
  - (iii) deer farms occupy the same land classes and run similar production systems (breeding, venison finishing/velvet) and have similar levels of inputs.
9. Both DINZ and B+LNZ are actively engaged in environmental management, with a particular emphasis on building farmers' capability and capacity to support an ethos of environmental stewardship, as part of a vibrant, resilient, and profitable sector based around thriving communities. Protecting and enhancing New Zealand's natural capital and economic opportunities and the ecosystem services they provide is fundamental to the sustainability of the sector and to New Zealand's wellbeing for current and future generations.
10. The submitters look forward to building a positive and enduring relationship with the Council, and to work proactively on environmental initiatives of mutual interest and benefit for the people of the Otago region and farmers.
11. This submission reflects the views of our levy payers. As an organisation we have gone to great lengths over a long period of time to ensure that our proposed approach is supported fully by the farmers who ultimately will play a critical role of implementing, funding and supporting the actions required to improve water resources throughout Otago.
12. The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the table in Section B below.
13. The outcomes sought and the wording used is a suggestion only. Where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the Plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

We welcome the opportunity to further discuss any of the points above with Otago Regional Council, should you require more information. For any inquiries relating to this feedback please contact Lauren Phillips on 027 279 0117 or [lauren.phillips@beeflambnz.com](mailto:lauren.phillips@beeflambnz.com).

Yours faithfully,



Lauren Phillips

Environment Policy Manager – South Island

4 May 2020

## Section B. Feedback

### General Submissions on Plan Change 7

14. ORC has elected to use a broadbrush approach to tackling the issue of approximately 1080 water permits expiring before a full plan review can be undertaken. This has offered convenience, expedience, and lower cost for ORC.
15. It does not, in the submitters' view, offer practical solutions for the permit holders. We oppose the broadbrush approach. Otago is startlingly diverse in its landscapes, conditions, and climates even at a sub-catchment level. ORC's Section 32 Evaluation Report for Plan Change 7 acknowledges this when it mentions that some areas of the region are overallocated for water use, and some are not. Applying the same brush to everybody in these circumstances can lead to unfair, impractical, and even devastating outcomes for permit holders. One size, in this case, fits nobody.
16. It is more appropriate to either overhaul the proposed provisions to avoid unfairly disadvantaging certain sub catchments, or to take a more appropriate sub catchment approach to sustainable and integrated management of natural resources generally in order to ensure that the plan enables and supports future sub catchment approaches, in an efficient and effective manner.
17. The provisions put forward by the submitters provide a more fair, efficient and effective approach to the integrated and sustainable management of water resources, and are consistent with the requirements of the NPSFWM, the Regional Policy Statement, and the Regional Plan: Water for Otago and provide for healthy and sustainable communities including economic wellbeing.
18. B+LNZ supports the intention by the Otago Regional Council (ORC) to provide an interim regulatory framework to address the issue of more than fifty percent of the region's water permits due to expire before a full regional plan review can be undertaken.
19. With that support for the intent in mind, B+LNZ's primary focus in this submission is seeking changes to PC7 to ensure that this proposed Plan change:
  - (i) safeguards the life supporting capacity and ecosystem health of freshwater;
  - (ii) recognises and provides for sustainable agricultural land uses;
  - (iii) gives effect to the *Resource Management Act 1991* (RMA or the Act), and NPSFWM;
  - (iv) establishes a clear pathway that provides individuals and communities certainty about what will be required of them in order for the Objective to be achieved in a way that is consistent with the principles of sustainable management;
  - (v) provides for water use, land use, and development which has been undertaken within the bounds of a valid permit.

## Relief sought to give effect to submissions on the plan

20. That the relief outlined below and under section B specific submission points, is adopted and subsequent changes that give effect to the relief sought are adopted including the following amendments to PC7:
  - (i) That in formulating the objectives, policies, and rules; the economic wellbeing, including productive economic opportunities, are provided for;
  - (ii) That objectives, policies and methods, including rules, are included which facilitate and support the establishment and operation of (sub)catchment collective groups to manage water resource and biodiversity issues facing a catchment; and
  - (iii) That objectives, policies and methods support innovative and, where required, edge of field mitigation which allows businesses to remain viable through adopting flexible approaches and practice changes; and encourages communities to work together to identify, understand and act collectively to improve water resources;
21. That land use and ancillary discharges objectives policies and methods including rules recognise and provide for drystock sector farming operations including:
  - (i) diversity of systems, soil, geology, and climate;
  - (ii) provide flexibility for land and resource users to adopt land use and farming operations to adapt to and meet markets, technology, and environmental constraints such as climate;
  - (iii) provide for adaptation and changes in farm systems and management approaches to respond to technology, climate change and markets;
  - (iv) remove any reference to requiring (grand-parenting) farming operations to be held at historic land use, nutrient discharge levels, or stocking rates (implied by Policy 10A.2.1, Rule 10A.3.1.1, and Rule 10A.3.2.1);
  - (v) ensure the requirement for specific mitigation is able to be tailored to a farm level and can provide for the future aspirations of the business; and is tailored to specifically meeting the environmental risks of concern specifically for the property and sub catchment.
22. That regulatory methods are tailored to address the environmental issues specific to a sub catchment or watershed and the land use;
23. Such other or further relief as addresses the issues raised by this submission.

## Specific Submissions on Plan Change 7

Specific Provision in the Proposed Plan	Submission	Decision sought from Otago Regional Council
1. Objective 10A.1.1	<p>The submitters oppose this provision in part. Plan Change 7, as per the Section 32 Evaluation Report, is an interim regulatory framework, the purpose of which is to ensure that ORC is not faced with having to replace more than half of its region's water permits on long duration permits before it can determine how much water, and where, and for use by whom, is sustainable on a sub-catchment level. As such, it is not appropriate to use this plan change as an opportunity to claw back water allocation, grandparent land use, undermine land value, and establish a nutrient allocation framework outside of the proper process and with the scientific, economic, social, and consultation backing to do so through the full plan review.</p> <p>This would be consistent with both the Professor Skelton's report, which recommended to that ORC 'establish minimum flows and limit setting <b>based on robust science and hydrological modelling, including fair allocation within ecological limits.</b>'<sup>1</sup> (Emphasis added.)</p> <p>And Minister Parker's first direction to ORC on the deemed permits matter, which was to establish a coherent framework for assessing water consent applications.</p>	<p>The submitters seek that the provision is amended as set out below:</p> <p><del>Transition toward the long-term sustainable management of surface water resources in the Otago region by establishing</del> To establish an interim planning framework to manage new water permits, and the replacement of deemed permits and water permits to take and use surface water (including groundwater considered as surface water) where those water permits expire prior to 31 December 2025, until the new Land and Water Regional Plan is made operative.</p>
2. Policy 10A.2.1	<p>The submitters oppose this provision as notified. Plan Change 7, as per the Section 32 Evaluation Report, is an interim regulatory framework, the purpose of which is to ensure that ORC is not faced with having to replace more than half of its region's water permits on long duration permits before it can determine how much water, and where, and for use by whom, is sustainable on a sub-catchment level. As such, it is not appropriate to use this plan change as an opportunity to claw back water allocation, grandparent land use, undermine land value, and establish a nutrient allocation framework outside of the proper process and with the scientific, economic, social, and consultation backing to do so through the full plan review. This provision, reinforced by Rule 10A.3.1.1 and 10A.3.2.1 purport to do exactly that, however.</p>	<p>The submitters seek that the provision is deleted in its entirety.</p>
3. Policy 10A.2.2	<p>The submitters oppose this provision as notified.</p> <p>The submitters appreciate that ORC do not want to grant permits with up to 30 year durations where it might need to recall many of them after new allocation limits are established under a full plan review. This would not provide for intergenerational justice and in some catchments it would not enable ORC to fulfil its obligations under the NPSFWM. A six year duration for a water permit, however, is so short as to be a liability to the land owner. Short term consents do not provide any certainty to allow for farm planning. Aside from the cost of obtaining the consent itself, a number of measures to mitigate or reduce adverse effects on the environment require significant investment, financial and in terms of resources. Having no certainty as to whether or not the land user can continue a particular activity beyond ten years disincentivises undertaking those measures on farm.</p> <p>For example, moving irrigation onto a more efficient infrastructure would require significant financial investment. It is a risky investment for both the land user and the financial institution that the land owner would need to borrow from in order to fund it. Now, more than ever, holding equity in one's land will enable Otago's farmers to adapt to a wildly different global scene and the increasing effects of climate change. Having that equity means having the ability to fund flexibility, which itself enables our farmers to adapt and survive. Now, more than ever, that flexibility will be crucial for the drystock sector and for Otago as a whole. Current indications suggest that land value for six-year permit holders could reduce by up to 50% in the view of financial institutions.</p> <p>Similarly, now, more than ever, budgets and resourcing are less than certain for territorial authorities. Timeframes within which ORC may have been expecting to feasibly undertake a full plan review may need to be revised, and six years is likely to be an overly ambitious goal in light of current events. Having such a short term duration may see ORC and the permit holders having</p>	<p>The submitters seek that the provision is amended as set out below:</p> <p>Irrespective of any other policies in this Plan concerning consent duration, only grant new resource consents for the take and use of water for a duration of nor more than <del>six</del> <u>ten</u> years.</p>

<sup>1</sup> Professor Peter Skelton *Investigation of Freshwater Management and Allocation Functions at Otago Regional Council* dated 1 October 2019 (Skelton Report) pp 35 – 36.

		<p>to repeat this process all over again without a full plan review to move on to, with renewed costs and upheaval to their businesses.</p> <p>The submitters consider that a ten year duration is appropriate in the circumstances. This gives the permit holders and their lending facilities more certainty, buffers their land values against some of the associated loss, and allows for intergenerational justice in water use in the event that the permits are not reviewed.</p> <p>We consider that review conditions in the consents, already proposed in Rule 10A.3.1.1. are sufficient to guard against preventing ORC from fulfilling its obligations under the NPSFWM. It would be able to recall and review permits to reassess them against the reviewed full plan change, backed by scientific, economic, and social assessments, cost benefit analyses, and meaningful consultation processes.</p>	
4.	Policy 10A.2.3	<p>B+LNZ opposes this provision in part for the reasons listed in the submissions for Policy 10A.2.1 and Policy 10A.2.2, and for the reasons further discussed in Rule 10A.3.1.1 and Rule 10A.3.2.1 below.</p>	<p>The submitters seek that the provision is amended as set out below:</p> <p>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 not more than <del>six ten</del> years, <del>except where Rule 10A.3.2.1 applies</del> and:</p> <p>(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</p> <p>(b) The resource consent granted will expire before 31 December 2035.</p>
5.	Rule 10A.3.1.1	<p>The submitters oppose this provision in part.</p> <p>As previously discussed, the submitters support a controlled activity status for permits to replace deemed and water permits due to expire before 2025. The submitters also support provision 10A.3.1.1(ii) which requires the permit being replaced to be valid.</p> <p>However, the submitters oppose the rest of Rule 10A3.1.1 on the following grounds:</p> <p>10A.3.1.1(i) The consent duration of up to (but potentially less than) six years to replace existing permits is not appropriate for the reasons already submitted for Policy 10A.2.2 above.</p> <p>10A.3.1.1(iii) effectively grandparents land use under irrigation for permit holders to the apparently arbitrary year of 2017/18, even where the permit holder may have developed land under irrigation within the bounds of their existing permit. By grandparenting land use, and to the year of 2017/18, this provision:</p> <ol style="list-style-type: none"> <li>Provides no scientific, economic, social, or other basis for the use of the 2017/18 year in this rule in the Section 32 Evaluation Report to this plan change; and</li> <li>Establishes a grandparented nutrient allocation framework and picks land use winners and losers ahead of the region's proper process to determine the appropriate allocation framework through true and meaningful consultation; cost-benefit analysis, as well as scientific and economic modelling; and</li> <li>The purpose of this plan change is not to determine land use or nutrient allocation. The purpose, as stated on page 5 of the Section 32 Evaluation Report for this plan change, is to provide an interim regulatory framework to provide for the assessment of applications to take and use water, specifically for water permits that are due to expire before 2025. This provision, nevertheless, purports to establish a land use and nutrient allocation framework; and</li> </ol>	<p>The submitters seek that the provision is amended as per below:</p> <p>10A.3.1.1 Despite any other rule or rules in this Plan:</p> <ol style="list-style-type: none"> <li>Any activity that is currently authorised under a Deemed Permit; or</li> <li>The take and use of surface water (including groundwater considered as surface water under policy 6.4.1.A(a), (b), and (c) of this Plan) that is currently authorised by an existing water permit where that water permit expires prior to 31 December 2025;</li> </ol> <p>Is a <i>controlled</i> activity provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>The consent duration sought is no more than <del>six ten</del> years; and</li> <li>The deemed permit or water permit that is being replaced is a valid permit; and</li> <li><del>The application demonstrates that the total land area under irrigation does not exceed that irrigated in the</del></li> </ol>

	<p>(d) Fails to provide for development which may have been made within the bounds of the existing permit since 2017/18 which might have increased land area under irrigation, for example from a less efficient irrigation type to a more efficient irrigation method, for example to pivot irrigation. This may have increased the land area under irrigation without necessarily requiring more water; and</p> <p>(e) Robs the permit holder of any development and investment post-2017/18 which was made in good faith within the bounds of an existing valid permit; and</p> <p>(f) Effectively makes any development which increased land area under irrigation post 2017/18 illegal retrospectively, despite that development having been carried out under a valid permit.</p> <p>10A.3.1.1(iv) As with provision (iii), provision (iv):</p> <p>(g) Grandparents the rate of take to an arbitrary period of 2012-2017, and provides no scientific, economic, social, or other basis for the use of the 2012-17 period in this rule in the Section 32 Evaluation Report to this plan change; and</p> <p>(h) Fails to provide for development which may have been made within the bounds of the existing permit beyond the 2012/17 average which might have increased the rate of take while remaining within the bounds of an existing permit; and</p> <p>(i) Robs the permit holder of any development and investment post-2017 which was made in good faith within the bounds of an existing valid permit; and</p> <p>(j) Makes any development which increased the rate of take beyond the average in 2012-17 illegal retrospectively, despite that development having been carried out under a valid permit; and</p> <p>(k) Has the effect of allowing ORC to claw back water which has been allocated, ahead of the appropriate modelling and scientific, economic, and social analysis of each freshwater management unit to establish how much water allocation, if any, should be reduced, and where, and by whom. Aside from proper process not being followed if ORC was trying to claw back 'residual' allocation,</p> <ol style="list-style-type: none"> <li>i. The period of either 2017/18 or 2012-17 does not give an accurate portrayal of what is actually being used, because it does not allow for development between that time and notification of this plan change within the bounds of a valid permit; and</li> <li>ii. The purpose of this plan change is not to claw back water allocation. It is an interim regulatory framework to address the issue of more than half the region's water permits expiring before a new regional plan can be notified. Taking away water allocation from permit holders who may be using that water, has permanent negative effects on the permit holder. There is nothing interim about it. The broad brush approach of this plan change would see permit holders losing water allocation even in freshwater management units where water is not overallocated.</li> </ol> <p>10A.3.1.1(vi) The submitters oppose this provision for the same reasons listed in paragraphs (g)-(k) above.</p> <p>Further, the submitters oppose the matters of control for the following reasons:</p> <ul style="list-style-type: none"> <li>• Matter (a) – The submitters do not oppose this matter. Detailed, easy to follow, and easily available information should be provided to permit holders, however, to ensure that they are able to comply.</li> <li>• Matter (b) – Oppose for the reasons already outlined above for this proposed rule.</li> <li>• Matter (c) – ORC has indicated it will use established standards from Irrigation New Zealand and Aqualinc to determine what efficient water use is. Otago is a particularly diverse region, with diverse land uses, soils, topographies, and climates. Working from a rigid set of standards to determine whether water use is efficient or not does not allow for varying practices to adapt to that diversity. Where consent processers and compliance officers at ORC were guaranteed to have training and experience in both farm systems and irrigation systems to represent the wide variety that the region practices, the submitters would not have concerns about the rigidity of said efficiency standards, as the processers and officers could be trusted to apply their knowledge and training to find sensible solutions. In the absence of that guarantee, however, we see the potential for impractical and perverse outcomes due to ORC staff applying standards rigidly due to not having enough knowledge of farming and irrigation or the region's diversity generally to be able to deviate from numbers in a template or chart.</li> <li>• Matter (d) – The submitters do not oppose this matter. Detailed, easy to follow, and easily available information should be provided to permit holders, however, to ensure that they are able to comply.</li> <li>• Matter (e) – The submitters do not oppose this matter.</li> </ul>	<p><del>2017-2018 irrigation season, if the abstracted water is used for irrigation; and</del></p> <p>(iv) <del>The rate of take shall be no more than the average maximum rate of take limit recorded during the period 1 July 2012-30 June 2017 and calculated in accordance with the method in Schedule 10A.4: and</del></p> <p>(v) Any residual flow, minimum flow, or take cessation condition (whichever is applicable) is included in the application for resource consent: and</p> <p><del>(vi) The volume of water taken shall be no more than the average maximum of the daily volume limit, or monthly volume limit, or annual volume limit (whichever one or more are applicable) recorded during the period 1 July 2012-30 June 2017, and calculated in accordance with the method in Schedule 10A.4.</del></p> <p>The Council reserves control over the following matters:</p> <ol style="list-style-type: none"> <li>(a) Intake method and low rate controls to avoid or mitigate fish entrainment; and</li> <li>(b) <del>The volume and rate of water taken, dammed, discharged, or diverted, and the timing and frequency of the take or damming or diversion or discharge; and</del></li> <li>(c) <del>Efficiency of water use and how that efficiency is to be sustained for the duration of the water permit; and</del></li> <li>(d) Provision of fish passage; and</li> <li>(e) The rules or operating procedures of any relevant water allocation committee that exists for the catchment; and</li> <li>(f) <del>Minimum flow, residual flow, or take cessation conditions and</del></li> <li>(g) Review conditions; and</li> <li>(h) Compliance monitoring; and</li> <li>(i) The point and method of measurement and the method for transmitting recorded data to Council.</li> </ol>
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		<ul style="list-style-type: none"> <li>• Matter (f) – Oppose for the reasons already outlined above for this proposed rule.</li> <li>• Matter (g) – The submitters do not oppose this matter.</li> <li>• Matter (h) – The submitters do not oppose this matter.</li> <li>• Matter (i) - The submitters do not oppose this matter.</li> </ul>	
6.	Rule 10A.3.2.1	<p>The submitters oppose this provision for the reasons listed in Rule 10A.3.1.1 above.</p> <p>Plan Change 7, as per the Section 32 Evaluation Report, is an interim regulatory framework, the purpose of which is to ensure that ORC is not faced with having to replace more than half of its region's water permits on long duration permits before it can determine how much water, and where, and for use by whom, is sustainable on a sub-catchment level. As such, it is not appropriate to use this plan change as an opportunity to claw back water allocation, grandparent land use, undermine land value, and establish a nutrient allocation framework outside of the proper process and with the scientific, economic, social, and consultation backing to do so through the full plan review. This plan change, particularly through this rule and Rule 10A.3.1.1, purports to do exactly that.</p> <p>The use of a non-complying activity status is also unduly harsh in light of the fact that any permit holder who does not meet any one of the conditions for proposed Rule 10A.3.1.1 would then need to apply under that non-complying activity status even where the activity was permitted and within the bounds of a valid permit at the time. As discussed above, this has the effect of making activities undertaken after 2017 illegal retrospectively, despite being legal at the time because it was carried out in good faith under a valid permit.</p>	The submitters seek that this provision is deleted in its entirety.
7.	Schedule 10A.4	The submitters oppose this schedule for the reasons listed in the submissions for Rule 10A.3.1.1 and Rule 10A.3.2.1 above.	The submitters seek that this schedule is deleted in its entirety.
8.	Table of minor and consequential changes: Section 1.4	The submitters oppose this section for the reasons listed in the submissions for Rule 10A.3.1.1 and Rule 10A.3.2.1 above.	The submitters seek that this section is deleted.