




Plan Change Submissions

Water Quality Plan Change
(Omnibus Plan Change)

August 2020

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMB.NZ.COM | BY FARMERS. FOR FARMERS

1

If You're Short on Time...

Here are some of the big ones to focus on:

Part A

- Policy 7.D.6 Nitrogen grandparenting for high N emitters (p7)

Part C

- Policy 7.D.9 (b)(i) Progressive exclusion of stock from waterways (p33), and
- Policy 7.D.9(d) stock exclusion from waterbody setbacks and bare soil restrictions (p34)

Part D

- Rule 14.6 Intensive Grazing permitted activity (p41), and
- The Intensive Grazing definition (p43)

Part E

- Rule 13.5.1.8A(b) dairy cattle exclusion from waterways and setback distances (p47), and
- The definition of Dairy Cattle (p50)

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMB.NZ.COM | BY FARMERS. FOR FARMERS

Wait, what about Essential Freshwater?

EFW is operative – in force - from September 2020.

What about this plan change? Do I still have to bother with it?

That will apply too, so YES!

Yeah, nah. I don't get it...

All of the EFW regulations will apply to Otago until Otago's regional plan gives effect to the NPS FWM.

The plan changes will also apply. So where the EFW is stricter, EFW will apply, where the plan change is stricter, the plan change will apply.

Where there are extra things in EFW, this can apply in addition to the plan change.

2

Submissions

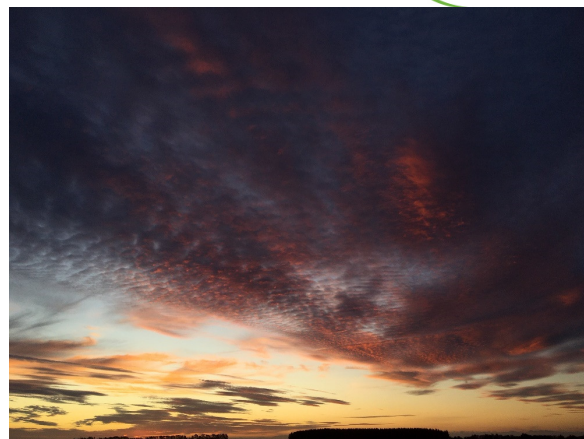


What can you do?

Make a submission on the plan change. This will affect you; your opinion matters.

Submissions are due by 5pm, 17 August 2020. You can email or post them, but you must send them to BOTH the EPA and ORC. Email and postal addresses are on the submission templates

Submission templates are on our website, along with some helpful submission resources www.beeflambnz.com/news-views/otago--plan-change-7-and-omnibus-pc-1-and-8-plan-change



Essentially you need to say:

Oppose or support → why + how it will affect you → What you want instead
 Poi: Do you want submission help?

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMBNZ.COM | BY FARMERS. FOR FARMERS

3

Writing a Submission is Easy



The EPA Submission Template



Tell the EPA what parts of the Plan Change you like AND dislike

If there's a proposed change you like, say so. Otherwise it might get cut

Tell the EPA how the Plan Change will affect you

For each part of the plan you've identified – give a brief summary of why you 'oppose' or 'support' the provision

Tell the EPA what changes you would like them to make

Briefly say what solution you propose. Explain how you would like the plan changed

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMBNZ.COM | BY FARMERS. FOR FARMERS

4

Tips for Writing Submissions



Technical Advice

- ✓ MAKE IT EASY (to read)
- ✓ Be concise
- ✓ Structure!
- ✓ Keep like ideas with like ideas
- ✓ Avoid bad or archaic language
- ✓ This is not a vote. Don't just copy and past someone else's stuff

General Advice

- ✓ MAKE IT EASY (to say yes)
- ✓ Talk about yourself
- ✓ Offer solutions
- ✓ Write what you know
- ✓ A submission is a sales pitch
- ✓ Remain professional
- ✓ Remain constructive
- ✓ Remember audience and perspective
- ✓ Pick your words carefully: using 'i.e.' limits you to exactly what follows it.

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMB.NZ.COM | BY FARMERS. FOR FARMERS

5

So, What Does A Submission Look Like?

1. Provision



What are you submitting on?

You can submit on specific parts of Water Plan Change 8 or the whole plan change.

I am submitting on the whole of Plan Change 8 <input type="checkbox"/>	I am submitting on specific parts of Plan Change 8 (please detail below) <input checked="" type="checkbox"/>
The specific parts of the matter that my submission relates to are:	
Part A: Policy 7.D.6	
And	
Part C: Policy 7.D.9.(b)(i) Policy 7.D.9(d)	
And	
Part D: Rule 14.6 Definition: Intensive Grazing	
And	
Part E: 13.5.1.8A (b) Definition: Dairy Cattle	

Let's use this one as a rough example

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMB.NZ.COM | BY FARMERS. FOR FARMERS

6

What Does A Submission Look Like?



2. Oppose/Support + Why

What is your view on Plan Change 8 or the specific parts listed above?

Please select one, if you have multiple views state clearly in the comments box below.

Support <input type="checkbox"/>	Neutral <input type="checkbox"/>	Oppose <input checked="" type="checkbox"/>
The reasons for my view(s) are:		
<p>Part A: Policy 7.D.6</p> <p>I oppose this policy.</p> <p>The policy locks in nitrogen for high nitrogen leachers in resource consents for up to 10 years. This means there is automatically less nitrogen available in the allocation for farmers who were farming within environmental limits when Otago Regional Council reviews its regional plan, because a significant proportion of the nitrogen has already been locked up in resource consents that would expire well after the regional plan changes. The Otago Regional Council has not yet done the scientific work and modelling to determine how much nutrients need to be reduced in Otago's waterbodies, and therefore how much nitrogen allocation is available to land users. It should not be allowing nitrogen to be locked into resource consents until it has done that work.</p> <p>Policy 7.D.6 also effectively sets up a grandparented nutrient allocation framework for Otago. Otago's current plan does not have a grandparented nutrient allocation framework and Otago Regional Council hasn't undertaken the scientific, economic, and social analysis or consultation to establish what nutrient allocation framework is the right one for Otago.]</p>		

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMB.NZ.COM | BY FARMERS. FOR FARMERS

7

What Does A Submission Look Like?



3. What Do You Want Instead

What decision would you like the Environment Court to make?

Approve Plan Change 8 <input type="checkbox"/>	Approve Plan Change 8 with amendments <input type="checkbox"/>	Decline Plan Change 8 <input type="checkbox"/>
The reasons for my view and/or any amendments I am seeking are:		
<p>Part A: Policy 7.D.6</p> <p>Delete this policy.</p> <p>Otago Regional Council must undertake the appropriate scientific, economic, and social analysis to make informed policies and rules about the appropriate allocation framework to address nitrogen losses in the region. This needs to be done in a coordinated manner, not through piecemeal bits of regulation like policy 7.D.6, and by using a transparent, robust process that includes meaningful consultation with farmers.]</p>		

0800 BEEFLAMB (0800 233 352) | WWW.BEEFLAMB.NZ.COM | BY FARMERS. FOR FARMERS

8