



Submission Number  
Office use only

## Submission Form

Send your submission to reach us by  
4 pm on Tuesday, 10 August 2021

<b>Post:</b> The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	<b>or Fax:</b> 0800 884 882	<b>or email:</b> rps@boprc.govt.nz
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Submitter: **AFFCO New Zealand Limited, Rangioru Plant**

This is a submission on **Proposed Change 5 (Kaituna River) to the Bay of Plenty Regional Policy Statement**

- 1 I ~~could~~/**could not**\* gain an advantage in trade competition through this submission. [\*select one]
- 2 ~~I am/am not~~\* directly affected by an effect of the subject matter of the submission that [\*select one]  
(a) ~~adversely affects the environment, and~~  
(b) ~~does not relate to trade competition or the effects of trade competition~~  
[Delete the entire paragraph if you could not gain an advantage in trade competition through this submission.]
- 3 The details of my submission are in the attached table.
- 4 I **wish**/~~do not wish~~ to be heard in support of my submission. [\*select one]
- 5 If others make a similar submission, I will consider presenting a joint case with them at a hearing. [Delete if you would not consider presenting a joint case.]

\_\_\_\_\_  
[Signature of person person authorised to sign on behalf of person making submission.]  
[NOTE: A signature is **not** required if you make your submission by electronic means.]

09 August 2021

**Date**

**Contact person:** [Name and Designation if applicable]

Garry Venus, Director, Argo Environmental Limited

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Submissions contain personal information within the meaning of the Privacy Act 2020. By taking part in this public submission process, submitters agree to any personal information (including names and contact details) in their submission being made available to the public and published on our website, and for the information collected to be held in accordance with our Privacy Statement available at [www.boprc.govt.nz](http://www.boprc.govt.nz).

BOPRC ID: A3683287

**The specific provisions of the proposal that my submission relates to are:**

Page No	Reference (Issue, Objective, Policy, or Method)	Support/Oppose	Decision Sought <b>What changes you would like to see</b>	Give Reasons
2	<p>Section 2.12.3 Kaituna River Paragraph 6</p> <p>Te Maru o Kaituna strongly support ... prioritising the health and well-being of water bodies and freshwater ecosystems before providing for human health needs. In doing so the hierarchy of obligations is to the health and well-being of water bodies and freshwater ecosystems first, then the health needs of people (such as drinking water), and thirdly the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future</p>	Oppose	AFFCO seeks equal recognition of the importance of the need for people and communities to provide for their social, economic and cultural wellbeing now and in the future.	<p>The existing wording does not provide adequate priority for economic wellbeing in considering the merits of undertaking activities.</p> <p>AFFCO recognises the importance of the well-being on the water bodies, however also submits that the health and well-being of the people will support and elevate the well-being of the water bodies and therefore there needs to be recognition of how the two interact to develop and maintain a thriving community and river.</p>
7	<p><b>Objective 43</b> Water in the Kaituna River is sustainably allocated and efficiently used to provide for the social, economic and cultural well-being of iwi, hapū and communities now and for future generations</p>	Support	Retain	Reflects an appropriate consideration of economic activities, particularly those which contribute to economic wellbeing of iwi, hapū and communities.

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16	<p><b>Method KR3: Identify locations for safe contact recreation in the Kaituna River</b></p> <p>Identify specific locations in the Kaituna River that are used for, or that people would like to use for, contact recreation under Policy KR 2B.</p>	Support in part	<p><b>Method KR3: Identify locations for safe contact recreation in the Kaituna River</b></p> <p>Identify specific locations in the Kaituna River that are used for, or that people would like to use for, contact recreation under Policy KR 2B, <u>with due recognition and preference given to avoiding areas of lawfully established mixing of wastewater with receiving waters.</u></p>	AFFCO welcomes a clear definition of areas of recreational use in the Kaituna River, but requests recognition and preference be given to avoiding mixing zones lawfully provided for under the Resource Management Act.
17	<p><b>Policy KR 3B: Using Mātauranga Māori to inform resource management decision making in the Kaituna River</b></p> <p>Use mātauranga Māori to inform resource management decision making processes in the Kaituna River and achieve the vision, objectives and desired outcomes of the Kaituna River Document'.</p>	Support in Part	<p><b>Policy KR 3B: Using Mātauranga Māori to inform resource management decision making in the Kaituna River</b></p> <p>Use mātauranga Māori <u>alongside science</u> to inform resource management decision making processes in the Kaituna River and achieve the vision, objectives and desired outcomes of the Kaituna River Document'.</p>	AFFCO considers that the application of mātauranga Māori should be used <u>alongside science</u> to achieve desired management objectives for the Kaituna River. The wording "alongside science" is used in the explanation of the policy but, for the avoidance of doubt, this wording should be included in the actual policy to recognise the significance that each element has, particularly in supporting one another.
18	<p><b>Policy KR 7B: Enabling economic development opportunities for iwi and hapū in the Kaituna River</b></p> <p>Enable economic development opportunities for iwi and hapū which respect and promote greater understanding of cultural associations with the Kaituna River and restore, protect or</p>	Support	Retain wording	AFFCO supports iwi aspirations for economic opportunities in the Kaituna River. AFFCO's Rangiuru plant has been contributing to iwi and hapū economic prosperity through creation of 600 jobs predominantly for local iwi at the plant over many decades.

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	enhance the river's well-being.			
24	<p><b>Method 23J: Develop strategies for managing wastewater and stormwater in the Rangitāiki River Catchment and Kaituna River</b></p> <p>In liaison with tangata whenua and local communities develop and implement strategies for the alternative treatment and disposal of wastewater and stormwater in the Rangitāiki River Catchment and Kaituna River.</p>	Support in part	<p><b>Method 23J: Develop strategies for managing wastewater and stormwater in the Rangitāiki River Catchment and Kaituna River</b></p> <p>In liaison with tangata whenua, <a href="#">commercial and industrial users</a>, and local communities develop and implement strategies for the alternative treatment and disposal of wastewater and stormwater in the Rangitāiki River Catchment and Kaituna River.</p>	Development of strategies for managing waste and stormwater in the Kaituna River Catchment should include commercial and industrial water users to ensure that any strategies arrived at are practicable and to allow for future transparency for all those affected.