



Silver Fern Farms Limited
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4 February 2013

Environment Canterbury Land and Water Regional Plan
Freepost 1201
Environment Canterbury
P.O. Box 345
CHRISTCHURCH 8140

Sarah.drummond@ecan.govt.nz

Re: Silver Fern Farms supporting documents in respect to Canterbury Proposed Land and Water Regional Plan for Hearing Group 1.

Original Submission Number: Silver Fern Farms' original submitter number is 257.

Dear Sarah,

Silver Fern Farms Limited requested a single hearing slot and is scheduled to be heard on 21st May in which both Hearing Group 1 and Hearing Group 2 matters will be discussed.

However, in order to meet the time requirements stipulated for the hearing programme as outlined in the Commissioners' Minutes the evidence that is to be used to support the hearing will be lodged separately in two parts.

The evidence attached to this letter is to support matters to be discussed in relation to Hearing Group 1.

Documents:

1. A written statement by Katherine McKenzie of Resource Management Group Limited providing an expert planning opinion on the interpretation of the status of Silver Fern Farms activities as an industrial activity.
2. An Assessment of Economic Impacts from Mike Copeland of Brown, Copeland & Co Limited for one of Silver Fern Farms' operations in Canterbury - Silver Fern Farms Pareora.
3. A written statement by Peter Callander of Pattle Delamore Partners Limited providing an expert opinion on water allocation and groundwater outcomes
4. A written Statement by Ian McIndoe of Aqualinc Research Ltd providing an expert opinion on water allocation
5. A written statement by Shirley Hayward of Pattle Delamore Partners Limited providing an expert opinion on water quality outcomes and impacts

The first document has been included to assist in clarifying the interpretation of Silver Fern Farms activities in relation to the application of industrial or farming provisions of the



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proposed plan. The interpretation was discussed and agreed informally with Environment Canterbury staff and for the avoidance of doubt has been included in order to formalise the clarification.

The outcome that will be sought by Silver Fern Farms in this respect is that our processing site activities, including temporary stock holding and the disposal of wastewater to land to support that principal activity, is to be considered under rules 5.69 / 5.70 as part and parcel of the wider industrial activity and not farming activity rules and schedules of the proposed plan.

The second document was prepared as supporting evidence for an appeal against the Pareora Catchment Environmental Flow and Water Allocation Regional Plan. However, following mediation Silver Fern Farms withdrew the appeal resulting in this report not being tabled before Environment Canterbury. This economic assessment is relevant to the issues in the proposed Land and Water Regional Plan, and provides an example of the economic relationship of our processing facilities and the service we provide within the primary sector across the region and the benefit of that to New Zealand.

The general theme of our presentation will be that Silver Fern Farms feels that primary support industries need to be adequately recognised or provided for within the proposed plan. We will also highlight the importance of a secure, reliable supply of good quality water for industrial use, along with the importance of industry, particularly those industries supporting the primary sector (primary support industries) to the region and our national economy.

The outcome that will be sought by Silver Fern Farms in this respect is that greater recognition of the importance of water in terms of both quality and quantity is required. Primary support industries such as the meat processing activities being carried out by Silver Fern Farms across the Canterbury region intrinsically play a major role in supporting agriculture, the community and economy in Canterbury. Constraining the quality and quantity of water to these activities also constrains the economic viability of the Canterbury region.

Silver Fern Farms considers that these matters can be better reflected in the plan via the issues and objectives sections, and/or via the inclusion of additional provisions specifically for primary support industries. By way of example, the Horizons One Plan recognises primary support industry activities.

Documents three, four and five are to be presented by other parties of the Canterbury Primary Sector Policy Group, of which Silver Fern Farms participates, to support their hearing, and are provided here to support Silver Fern Farms hearing.

Please do not hesitate to contact me by phone (027 496 6129) or e-mail (alison.johnstone@silverfernfarms.co.nz) if you wish to arrange to discuss any of the points raised prior to Silver Fern Farms specified hearing date.

Yours Sincerely



Alison Johnstone

Environmental Advisor – Group Environmental



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