

Janel Hau

From: Anita Murrell <anita.murrell@pork.co.nz>
Sent: Friday, 21 March 2014 1:35 p.m.
Subject: Submission on Variation 1 to the proposed Canterbury Land and water Regional Plan V1 to Canterbury LWRP Selwyn-Waihora Mar 2014.pdf
Attachments:
Categories: Purple Category

Please find the submission of NZPork on Variation 1 to the LWRP.

Kind regards,



20 March 2014



New Zealand

Dear Sir / Madam

Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan.

Please find attached a submission from the New Zealand Pork Industry Board (NZPork) on Proposed variation one.

We have reviewed the proposals for their impact on pig farming in the district and have suggested a number of changes.

NZPork appreciates the opportunity to comment, and we would be pleased to elaborate further on our submission. Please contact me in the first instance via the details below.

Yours sincerely

A handwritten signature in black ink, appearing to read "Anita Murrell".

Anita Murrell

Environmental Advisor

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New Zealand Pork Industry Board

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SUBMISSION ON Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

TO: Environment Canterbury
PO Box 345
Christchurch 8140
New Zealand

Via email: mailroom@ecan.govt.nz

SUBMISSION ON: Variation 1 to the Proposed Canterbury Land and Water Regional Plan

SUBMITTER: NZ Pork Industry Board

CONTACT DETAILS:

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NZPork is not a trade competitor who could gain an advantage in trade completion through this submission.

NZPork wishes to speak at the hearing on this submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

I am authorised to act and represent NZ Pork in making this submission.



Anita Murrell
20 March 2014

Introduction

The submitter, the New Zealand Pork Industry Board (NZPork), is a producer board whose statutory function is to represent the industry good interests of pig farmers and help in the attainment of the best possible net on-going returns. There are around 150 registered commercial producers, comprising a relatively small but significantly integrated sector of the New Zealand agricultural economy.

Large commercial operations, such as pork production units, provide a range of economic and social benefits to the Canterbury region. These operations have an important flow-on effect to the community, forming an integral part of the rural economy as they utilise other farming resources such as grains for feed production, as well as providing employment.

NZPork is funded by producer levies and actively promotes “100% New Zealand Pork” to support growth in the volume and value of New Zealand grown pork. Nationally, the total economic activity associated with domestically farmed pigs has been estimated to be in the range of \$750 to \$900 million pa (NZIER, 2007).

NZPork producers are facing a number of economic, social and environmental challenges in order to remain sustainable. Over the last 20 years, production has remained relatively constant while total pig numbers have dropped and the industry has undergone significant rationalisation (i.e. fewer and larger farms). Currently, nearly all production is consumed locally and makes up approximately 51% of the domestic market supply.

The contribution of imported pork to NZ’s total pork consumption has increased significantly over the last 10 years. This competition for supply has placed demands on pork producers, who have responded by developing highly efficient systems that are capable of competing against imported products. However, product margins for the industry remain tight and conversations with farmers have indicated that the cost of obtaining consents and remaining compliant is one of the key concerns.

NZPork maintains a strong focus on supporting research to optimise the efficiency and sustainability of farming systems. Environmental management has been an explicit strategic focus over the past 30 years. Throughout this period, NZPork has been pro-active in working alongside central government and local authorities to research the environmental impact of industry practices, to develop best management tools, and to support producer uptake.

NZPork is keen to see that the productive capability of the rural environment is maintained and enhanced and that conflicts between competing land use is avoided. There are challenges for the farming sector, Council and the community on how to manage the rural environment and its resources. For the farming sector, there are no alternative locational choices available. These productive rural activities need to be in this environment.

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that:		(3) I seek the following decisions from Environment Canterbury:
Section & Page	Subsection/ Point	Oppose/Support	Reasons	
11.1A Definitions, Page 4-4	Baseline Land Use	Oppose	Where resource consent has been issued for a change in land use (e.g. new piggery, new effluent discharge) in the period described, but implemented after 30 June 2013 then the Baseline Land Use should be based on the new lawfully established activity.	Amend definition of Baseline Land Use: Means the land use, or uses, on a property between 1 July 2009 and 30 June 2013 used to determine a property's 'nitrogen baseline' as defined in section 2.10 of this plan. <u>In cases where a building consent, effluent discharge consent or other consent has been granted for a new or changed activity in the period 01 July 2009 – 30 June 2013, the definition of Baseline Land Use will be on the basis that the activity is operational.</u>
	Good Management Practice Nitrogen and Phosphorus Loss Rates	Support in part	Referring to good management practice in the plan allows for innovation and adaptation by the farming sector. Good management practice is strongly supported by NZPork as a tool for managing nutrient loss. A definition of Good Management Practice is required to give effect to the loss rate definition.	Amend definition: Means nitrogen and phosphorus loss rates (in kilograms per hectare per annum) from a property (including losses below the root zone of a property) for different soils, rainfall and farm type operating at good management practice <u>as defined in section 11.1A of this plan.</u> Add a definition of Good Management Practice as below.
	Good Management	Addition	Good Management Practice is referred to in the plan and other definitions, therefore it must be defined.	Include a definition of good management practice:

	Practice			<u>Good Management Practice means industry derived standards as agreed under the Matrix of Good Management (MGM) Project, and consists of a suite of practices that are expected to be applied on farm.</u>
	Intensive Winter Grazing	Oppose	Any grazing will result in removal of or damage to vegetation, and may expose patches of bare ground. A firmer definition of intensive winter grazing is required to manage the effects (as required by the Resource Management Act 1991) rather than the activity.	Amend the definition of Intensive winter grazing to: Means grazing of stock between 1 May and 30 September on fodder crops or pasture where the grazing results in damage to vegetation and exposes bare ground and/or pugging of the soil at a stocking rate that <u>precludes the maintenance of groundcover as defined by industry derived good management practice.</u>
11.4 Policies, page 4-5	11.4.12 (a), Page 4-6	Oppose in part	If consent for a new or changed activity has been granted during the baseline period, then the nitrogen baseline should be calculated on the basis that the activity is operational, otherwise lawfully established activities may become non-complying or prohibited. The current definition of nitrogen baseline only allows this for new or upgraded dairy milking sheds, when it should apply equally to all farming activities.	Amend point (a): (a) Not exceed the nitrogen baseline where a property's nitrogen loss calculation is more than 15kg of nitrogen per hectare per annum <u>(In cases where a building consent, effluent discharge consent or other consent has been granted for a new or changed activity in the period 01 July 2009 – 30 June 2013, the definition of nitrogen baseline will be on the basis that the activity is operational).</u>
	11.4.14 (b)	Oppose in part	NZPork agrees that limits must be set and reductions in	Amend point (b):

			<p>nitrogen loss made to maintain or improve water quality. However, since nitrogen loss rates from outdoor pig farming are not currently able to be modelled, it is impossible to know whether a 20% reduction in nitrogen loss rates from January 2022 is required or achievable.</p> <p>Pig farming is a small industry, and as such contributes very low total amounts of nitrogen leaching to any given catchment. The level of regulation and mitigation required of any sector should relate to the degree of overall environmental pressure exerted by that sector. In 2010 Environment Canterbury estimated nitrate-nitrogen leaching rates under pigs to be equivalent to those under irrigated beef (<i>Estimating Nitrate-Nitrogen leaching rates Under Rural Land Uses in Canterbury</i>). Pigs should therefore not be expected to achieve a higher reduction in nitrogen loss rates than irrigated beef.</p> <p>Environment Canterbury and the agricultural sector are currently investing heavily in the Matrix of Good Management (MGM) project to estimate nutrient loss rates and possible mitigation options for different farm types. NZPork welcomes the ECan initiative of the MGM project, and we remain committed to working through it to completion. Inclusion of arbitrary numbers in plans and policies before completion of the project undermines the collaborative process and goodwill established.</p>	<p>(b) Where a property's nitrogen loss calculation is greater than 15kg of nitrogen per hectare per annum, make the following further percentage reductions in nitrogen loss rates, beyond those set out in Policy 11.4.13(b), to achieve the catchment target for farming activities in table 11(i). <u>Levels of loss reduction required will be agreed between Environment Canterbury and agricultural sectors pending completion of the Matrix of Good Management Project, and directly related to the actual contribution of each sector to the overall nitrate loading of the catchment.</u></p> <p>(i) — 30% for dairy (ii) — 22% for dairy support; or (iii) — 20% for pigs; or (iv) — 13% for irrigated sheep, beef or deer; or (v) — 10% for dryland sheep and beef; or (vi) — 7% for arable; or (vii) — 5% for fruit, viticulture or vegetables; or (viii) — 0% for any other landuse.</p>
11.4.15	Support in part	NZPork supports an extension of time to meet required	Add the following:	

			reductions in nitrogen loss rates in certain circumstances. The Proposed Amendments to the National Policy Statement for Freshwater Management 2011 (NPS-FM) require regional councils to consider, among other matters, any social and economic implications as part of the catchment objective setting process. We therefore submit that this matter be included in this policy.	(d) <u>Any implications on the resource user, people or community, including social and economic implications.</u>
	11.4.16	Support	NZPork agrees that a maximum allowable level of nitrogen leaching is required to manage for community catchment outcomes. It is not currently possible to model nitrogen losses under outdoor pigs using Overseer, but the limited research to date suggests 80kg of nitrogen per hectare per annum is reasonable and achievable.	Retain policy 11.4.16 as proposed.
11.5.7 page 4-12		Support	NZPork supports a permitted activity rule until 1 January 2017. This allows a transition period for existing activities to implement additional compliance requirements.	Retain permitted activity rule.