Hi,

Attached is the Silver Fern Farms Limited further submission on V1 pLWRP.

Please acknowledge receipt.

Thanks

Ali
9 June 2014

Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

mailroom@ecan.govt.nz

RE: Proposed Land and Water Regional Plan Variation 1 Further Submission

Please find attached Silver Fern Farms further submission on the Proposed Land and Water Plan Variation 1. Silver Fern Farms did not make a submission on Variation 1 but were submitters on the Proposed Canterbury Land and Water Regional Plan.

In respect of supporting our farmer partner interests in the Selwyn Waihora sub region Silver Fern Farms generally support the submissions lodged by Beef + Lamb New Zealand (Sub ID52292) and North Canterbury Province of Federated Farmers NZ Inc (Sub ID 52318).

Submissions on specific points are attached, which for the most part, relate to provisions for industrial trade premise discharges.

Please direct any questions and further correspondence to Ali Johnstone from our Group Environmental team by phone (027 496 6129) or e-mail (alison.johnstone@silverfernfarms.co.nz).

Yours Sincerely

pp.

Daryn Jemmett
Group Environmental Manager
Further Submission on Proposed Variation 1 to the Canterbury Land and Water Regional Plan

Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991

Return your signed further submission by 5.00pm Monday 09 June 2014 to:
Freepost 1201 Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: ________________________________ Phone (Hm): ________________________________
Organisation*: Silver Fern Farms Limited Phone (Wk): (03) 307 8282 ext. 3450
* the organisation that this further submission is made on behalf of Phone (Cell): 027 496 619
Postal Address: PO Box 941, Dunedin Postcode: 9054
Email: alison.johnstone@silverfernfa.com Phone: ________________________________
Fax: ________________________________

Contact name and postal address for service of person making further submission (if different from above):
Alison Johnstone (Environmental Advisor - Planning, Group Environmental)
PO Box 283, Christchurch Mail Centre, Christchurch 8140

Only certain people can make further submissions. Please tick the option that applies to you:
☐ I am a person representing a relevant aspect of the public interest; or
☒ I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
☐ I am the local authority for the relevant area.

☐ I do not wish to be heard in support of my further submission; or
☐ I do wish to be heard in support of my further submission; and if so,
☐ I would be prepared to consider presenting your further submission in a joint case with others making a similar submission at any hearing

Service of your further submission:
Please note: any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: ________________________________ Date: Monday 9th June 2014
Daryn Jemmett - Group Environmental Manager

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.
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<td><strong>(1) I support or oppose the submission of:</strong></td>
<td><strong>(2) The particular parts of the submission I support or oppose are:</strong></td>
<td><strong>(3) The reasons for my support or opposition are:</strong></td>
<td><strong>(4) Support or oppose</strong></td>
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<tr>
<td><strong>Name &amp; postal address of original submission</strong></td>
<td><strong>Submission point reference number i.e. 4.23</strong></td>
<td><strong>Provide reason for support or opposition</strong></td>
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<td>See Attached for Details</td>
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Add further pages as required – please initial any additional pages.
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<td><strong>Provide reason for support or opposition</strong></td>
<td><strong>Note support or oppose</strong></td>
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<td>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</td>
<td>V1pLWRP-447</td>
<td>A new policy and the following new rule was proposed:</td>
<td>Oppose in part</td>
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<td>Attn: James Caygill / Cathy Begley</td>
<td></td>
<td>“Within the Selwyn Waipara catchment the discharge of any untreated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into surface water, or into or onto land, or into or onto land in circumstances where a contaminant may enter water is a prohibited activity.”</td>
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<td>PO Box 13 046</td>
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<td>It is understood that the intent of the rule, as outlined in the proposed policy, is to cease the discharge of untreated waste directly to surface water with these discharges to be provided for by enabling land based disposal.</td>
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<td>Christchurch 8141</td>
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<td>However, as written the rule would appear to prohibit all discharges, even those into or onto land, which the policy outlines as being the alternative that should be provided for.</td>
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<td>It is suggested, if the policy and rule were adopted, that the wording of the rule is reviewed and amended to reflect the intent as laid out in the policy.</td>
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<td>The following or similar is suggested:</td>
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“Within the Selwyn Waihora catchment the discharge of any untreated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into surface water, or into or onto land, or into or onto land in circumstances where a contaminant may enter water is a prohibited activity.”

In addition to the proposal to cease the discharge of untreated waste to surface water, the submission (policy and rule) proposes that the discharge of treated waste effluent directly to water should be phased out and become a prohibited activity by 2025.

“From 2025 within the Selwyn Waihora catchment the discharge of any treated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into surface water, or into or onto land, or into or onto land in circumstances where a contaminant may enter water is a prohibited activity.”

It is understood that the intent of the rule, as outlined in the policy, is to phase out the discharge of treated waste directly to surface water by 2025 with these discharges to be provided for by enabling land based disposal.

As written the rule would appear to prohibit all discharges, even those into or onto land, which the policy outlines as being the alternative that should be provided for.

However, regardless of the wording, the introduction of a prohibited activity...
status for the discharge of treated wastewater to water is opposed in principle. The as notified discretionary rule for existing discharges and non-complying rule for new discharges is considered to be appropriate.

A prohibited activity status does not take into account the actual effects of a discharge, and the mitigation / treatment applied.

| ANZCO Foods Limited, CMP Canterbury Limited and CMP Rakaia Limited Attn: Amanda Dewar Lane Neave Lawyers PO Box 2331 Christchurch 8140 Amanda.Dewar@laneneave.co.nz | V1pLWRP-1507 Silver Fern Farms made a similar submission to ANZCO on the proposed Land and Water Regional Plan regarding how the rules apply to industrial trade process waste, discharged to land, with nutrient management measures in place e.g. “cut and carry”, that could be interpreted as farming activities.

The need for clarification that the nutrient management rules applying to farming activities do not apply to the land based disposal of wastewater from industrial processing plants is supported. Whilst Silver Fern Farms does not have any industrial activities within the Selwyn Waihora zone, it is considered that these provisions should be consistent over all the zones. Silver Fern Farms are neutral on the method / provisions used to achieve this.

These activities are provided for and controlled under the industrial and trade waste rules (5.91 and 5.92), and already require consent. Consent conditions generally include management and monitoring programmes, reporting requirements and some form of nutrient balance (although not using overseer). Review of conditions can be dealt with through the consent process. | Support in Part |