

Janel Hau

From: Alison Johnstone <alison.johnstone@silverfern farms.co.nz>
Sent: Monday, 9 June 2014 3:31 p.m.
Subject: V1 pLWRP Further Submission
Attachments: Silver Fern Farms_LWRP V1_Further Sub_9 Jun 2014.pdf

Categories: Purple Category

Hi,

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

Please acknowledge receipt.

Thanks

Ali

Ali Johnstone

Environmental Advisor - Planning
(Group Environmental)

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Visit www.bestcutsbestrecipes.co.nz to discover our best cuts, now available with the world's best recipes.





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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

A handwritten signature in black ink, appearing to read "Ali Johnstone".

pp.

Daryn Jemmett
Group Environmental Manager



100% MADE OF NEW ZEALAND



Further Submission on Proposed Variation 1 to the Canterbury Land and Water Regional Plan

FOR OFFICE USE ONLY

Submitter ID:

File No:

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

Form with fields for Full Name, Organisation*, Postal Address, Email, Phone (Hm), Phone (Wk), Phone (Cell), Postcode, and Fax. Includes contact name and postal address for service of person making further submission.

Section titled 'Only certain people can make further submissions. Please tick the option that applies to you:' with three radio button options.

Section with three radio button options regarding the wish to be heard in support of the submission.

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.

Signature section with a handwritten signature, name 'Daryn Jemmett - Group Environmental Manager', and date 'Monday 9th June 2014'. Includes a note about public information.

| (1) I support or oppose the submission of: | (2) The particular parts of the submission I support or oppose are: | (3) The reasons for my support or opposition are: | (4) Support or oppose |
|--|---|---|------------------------|
| Name & postal address of original submission | Submission point reference number i.e. 4.23 | Provide reason for support or opposition | Note support or oppose |
| See Attached for Details | | | |
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Add further pages as required – please initial any additional pages.

| (1) I support or oppose the submission of: | (2) The particular parts of the submission I support or oppose are: | (3) The reasons for my support or opposition are: | (4) Support or oppose |
|---|---|---|-------------------------------|
| <i>Name & postal address of original submission</i> | <i>Submission point reference number i.e. 4.23</i> | <i>Provide reason for support or opposition</i> | <i>Note support or oppose</i> |
| <p>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</p> <p>Attn: James Caygill / Cathy Begley PO Box 13 046 Christchurch 8141</p> | V1pLWRP-447 | <p>A new policy and the following new rule was proposed:</p> <p><i>“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.”</i></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The following or similar is suggested:</p> | Oppose in part |



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| | | <p>“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.”</p> | |
| <p>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</p> <p>Attn: Mr James Caygill PO Box 13 046 Christchurch 8141</p> | V1pLWRP-448 | <p>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.</p> <p><i>“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.”</i></p> <p>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.</p> <p>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.</p> <p>However, regardless of the wording, the introduction of a prohibited activity</p> | Oppose |



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| | | <p>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.</p> <p>A prohibited activity status does not take in to account the actual effects of a discharge, and the mitigation / treatment applied.</p> | |
| <p>ANZCO Foods Limited, CMP Canterbury Limited and CMP Rakaia Limited</p> <p>Attn: Amanda Dewar</p> <p>Lane Neave Lawyers</p> <p>PO Box 2331</p> <p>Christchurch 8140</p> <p>Amanda.Dewar@laneneave.co.nz</p> | V1pLWRP-1507 | <p>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.</p> <p>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.</p> <p>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.</p> | Support in Part |

