



1 October 2010

Proposed Pareora Catchment Environmental Flow and Water Allocation Regional Plan
Environment Canterbury
PO Box 345
Christchurch

To Whom It May Concern

Re: Pareora Catchment Environmental Flow and Water Allocation: Proposed Regional Plan.

Silver Fern Farms appreciates this opportunity to submit on the Proposed Pareora Catchment Environmental Flow and Water Allocation Regional Plan, and are generally supportive of the proposed plan.

Silver Fern Farms Limited is the major Meat Processing Company in New Zealand, and as part of our company environmental policy we are committed to the maintenance of high environmental standards.

This includes a goal to minimise any adverse effects on the environment through our processing activities. We also endeavour to maintain close working relationships in our partnerships with Regional Councils and Territorial Authorities to actively manage existing environmental impacts and identify opportunities for improvement.

Silver Fern Farms currently has one processing plant within the Pareora River Catchment, located in the Township of Pareora. The coastal location puts the facility, and abstraction point for water take, at the bottom of the Pareora River catchment. The quantity and quality of water available are highly dependent on the users and management of water resources up-stream.

Silver Fern Farms contributes a valuable service to farmers and suppliers in the area and wider region through its integrated meat processing facility at Pareora. Silver Fern Farms views water as a valuable and essential commodity, the security of water supply, in terms of both quantity and quality, is paramount to the continuing viability of our operation.

Silver Fern Farms has explored and made submissions relating to the addition of a new rule that will guarantee supply without restrictions during times of low flow.

Silver Fern Farms wish to have the opportunity to be heard in support of their submission; and would be prepared to consider presenting our submission in a joint case with others making a similar submission.

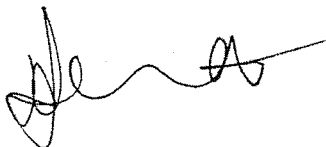
If you wish to clarify any of the matters raised, or just wish to further discuss the draft rule then please do not hesitate to contact in the first instance:

- Grant Day
Silver Fern Farms Pareora Plant Manager
grant.day@silverfernfarms.co.nz
(03) 6126975 / 0274587491

- Alison Johnstone
Environmental Officer for the Group
alison.johnstone@silverfernfarms.co.nz
(03) 3070231 / 027 496 6129

or myself at daryn.jemmett@silverfernfarms.co.nz.

Kind regards,

A handwritten signature in black ink, appearing to be 'Daryn Jemmett', with a long horizontal stroke extending to the right.

Daryn Jemmett
Group Environmental Manager

Provision	Oppose/ Support	Submission	Decision Sought
Page Number/Part/ Column/ paragraph			
Part 1 - Introduction			
Part 2 – Legal Framework	Support	Silver Fern Farms generally supports the rationale in Part 1.	No change required
	Support	Silver Fern Farms generally supports Part 2.	No change required
Part 3 – The Natural and Physical Resources of the Pareora River Catchment			
P5 / p3/ col1/ para3	Support in part	Whilst the general outline in this section is supported it does use outdated terminology that has not been utilised for a number of years, specifically:	It would seem appropriate to change the wording to read, or something similar: “... the Pareora Meat Processing Facility ...”
Overview		“... the Pareora freezing works ...” Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation.	And any consequential amendments relating to this submission.
P9 / p3/ col1/ para4	Support in part	Whilst the general outline in this section is supported it does use terminology that has not been utilised for a number of years, specifically:	It would seem appropriate to change the wording to read, or something similar: “... The Pareora Meat Processing Facility ...”
Population and Communities		“... The Pareora freezing works ...” Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation.	And any consequential amendments relating to this submission.
Part 4 – Demand for Water			
P11 / p4/ col1/ para7	Support in part	Whilst the general outline in this section is supported it does use outdated terminology that has not been utilised for a number of years, specifically:	It would seem appropriate to change the wording to read, or something similar: “The major industrial water user in the catchment is the
Commercial			

Silver Fern Farms Pareora: Submission on Proposed Pareora Environmental Flows and Water Allocation Regional Plan

and Industrial		"The major industrial water user in the catchment is the Pareora freezing works..." Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation.	Pareora Meat Processing Facility..." And any consequential amendments relating to this submission.
P11 / p4/ col2/ para1 Commercial and Industrial	Support in part	Whilst the general outline in this section is supported it does use outdated terminology that has not been utilised for a number of years, specifically: "...the freezing works are a major employer in the region. ... to enable the freezing works to abstract water from their infiltration gallery. The freezing works still abstract water ..." Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation.	It would seem appropriate to change the wording to read, or something similar: "...the Meat Processing Facility are a major employer in the region... to enable the Meat Processing Facility to abstract water from their infiltration gallery. The Meat Processing Facility still abstract water ..." And any consequential amendments relating to this submission.
P11 / p4/ col2/ para1 Commercial and Industrial	Object	Silver Fern Farms object to the statement that: "The original minimum flow on the Pareora River (300L/s at the huts flow recorder site) was set in the early 1980s to ensure that there was sufficient flow in the lower river to enable the freezing works to abstract water from their infiltration gallery. The freezing works still abstract water from this gallery, although they are less reliant on it now as they also have two bores (both more than 100m deep) from which they abstract water" Water from the infiltration gallery made up over 70% of water abstracted for the year 1 August 2008 to 31 July 2009. The infiltration Gallery is the primary and preferred source of water	It would seem appropriate to change the wording to read, or something similar: "The original minimum flow on the Pareora River (300L/s at the huts flow recorder site) was set in the early 1980s to ensure that there was sufficient flow in the lower river to enable the freezing works to abstract water from their infiltration gallery. The freezing works still abstract water from this gallery, although they are less reliant on it now as they also have two bores (both more than 100m deep) from which they abstract water in times of low flow when the gallery cannot keep up with demand" And any consequential amendments relating to this submission.

Silver Fern Farms Pareora: Submission on Proposed Pareora Environmental Flows and Water Allocation Regional Plan

P11 / p4/ col2/ para2 Commercial and Industrial	Support in part	for the Silver Fern Farms Pareora operation and it is no less reliant on the gallery, the bores were drilled to ensure security of supply during times of low flow when the gallery cannot keep up with demand. Whilst the general outline in this section is supported it does use outdated terminology that has not been utilised for a number of years, specifically: <i>“The freezing works deep bores ... However the infiltration gallery, from which the freezing works are authorised...For the year 1 August 2008 to 31 July 2009, the freezing works used...”</i> Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation. Whilst the general outline in this section is supported it does use terminology that has not been utilised for a number of years, specifically: <i>“The major industrial water user in the catchment is the Pareora freezing works...”</i> Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation.	It would seem appropriate to change the wording to read, or something similar: <i>“The Meat Processing Facility deep bores ... However the infiltration gallery, from which the Meat Processing Facility are authorised... For the year 1 August 2008 to 31 July 2009, the Meat Processing Facility used...”</i> And any consequential amendments relating to this submission.
P11 / p4/ col1/ para7 Commercial and Industrial	Support in part	Whilst the general outline in this section is supported it does use terminology that has not been utilised for a number of years, specifically: <i>“The major industrial water user in the catchment is the Pareora freezing works...”</i> Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation.	It would seem appropriate to change the wording to read, or something similar: <i>“The major industrial water user in the catchment is the Pareora Meat Processing Facility...”</i> And any consequential amendments relating to this submission.
P11 / p4/ col2/ para1 Commercial and Industrial	Support in part	Whilst the general outline in this section is supported it does use outdated terminology that has not been utilised for a number of years, specifically: <i>“...the freezing works are a major employer in the region. ... to enable the freezing works to abstract water from their infiltration gallery. The freezing”</i>	It would seem appropriate to change the wording to read, or something similar: <i>“...the Meat Processing Facility are a major employer in the region. ... to enable the Meat Processing Facility to abstract water from their infiltration gallery. The Meat Processing Facility still abstract water ...”</i>

P11 / p4/ col2/ para2	Support in part	works still abstract water ... Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation. Whilst the general outline in this section is supported it does use outdated terminology that has not been utilised for a number of years, specifically: <i>“The freezing works deep bores ... However the infiltration gallery, from which the freezing works are authorised...For the year 1 August 2008 to 31 July 2009, the freezing works used...”</i> Silver Fern Farms encompasses a modern integrated slaughter and further processing facility, far removed from the freezing works of old. Given this, it would seem appropriate to change the descriptor to reflect the operation.	And any consequential amendments relating to this submission. It would seem appropriate to change the wording to read, or something similar: <i>“The Meat Processing Facility deep bores ... However the infiltration gallery, from which the Meat Processing Facility are authorised... For the year 1 August 2008 to 31 July 2009, Meat Processing Facility used...”</i> And any consequential amendments relating to this submission.
Part 5 - Issues		Issue 3 outlines the social and economic dependence on water abstracted from the Pareora River. <i>“There is high social and economic dependence on the water abstracted from the Pareora River, not only to the individual abstractors but to the South Canterbury region. Over the decades which have passed since water was first abstracted from the Pareora River Catchment, a large number of farming operations have been established, many of which are now heavily reliant on water abstraction for their sustainability. Farming practices have been developed based on the current reliability of supply, to the extent where a significant increase in the minimum flow would severely affect the economic viability of established businesses”</i>	It would seem appropriate to change the wording to read, or something similar: <i>“There is high social and economic dependence on the water abstracted from the Pareora River, not only to the individual abstractors but to the South Canterbury region. Over the decades which have passed since water was first abstracted from the Pareora River Catchment, a large number of farming operations and ancillary services such as meat processing have been established, many of which are now heavily reliant on water abstraction for their sustainability. Farming and associated practices and services have been developed based on the current reliability of supply, to the extent where a significant increase in the minimum flow would severely affect the economic viability of established businesses. Similarly the meat processing facilities have been established based on reliability and quality of water supply, variations</i>

Silver Fern Farms Pareora: Submission on Proposed Pareora Environmental Flows and Water Allocation Regional Plan

		Silver Fern Farms generally support this section. However, it is felt that additional commentary is required to convey the importance of water quality and quantity to the Silver Fern Farms Pareora operation which supports farming, by providing an integrated service to the sector, in the area and wider region.	<i>in flow and quality would affect the economic viability of these established businesses also."</i> And any consequential amendments relating to this submission.
Part 6 – Objectives and Policies			
P14 /p6 /col1/ para8 Key Characteristics Points 5	Support in Part	Point 5 states that: <i>"Should additional economically viable water become available for abstraction in the Pareora River Catchment through augmentation (or another method), to review the allocation regime for the Pareora River Catchment to reduce the impact of abstraction on in-stream values during periods of low flow."</i> Whilst the augmentation of river flow is supported in theory, the augmentation should not be to the detriment of the water quality for existing users downstream. Silver Fern Farms Pareora is at the bottom of the catchment, whilst the benefits from increased flow would be of benefit to the operations any diminishing of water quality from augmentation (and any cumulative effect if augmented at more than one point) upstream could be detrimental to our operation. Reduced water quality could lead to increased treatment costs to return the water to the high quality required for food processing purposes.	It would seem appropriate to change the wording to read, or something similar: <i>"Should additional economically viable water become available for abstraction in the Pareora River Catchment through augmentation (or another method), to review the allocation regime for the Pareora River Catchment to reduce the impact of abstraction on in-stream values during periods of low flow, but whilst still maintain water quality"</i> And any consequential amendments relating to this submission.
P14 /p6 /col2/ para5 Objective 5	Support in Part	This objective promotes <i>"... returning water to the river when possible."</i> Whilst supported the augmentation should not diminish the water quality for existing users downstream or down-gradient in the catchment.	It would seem appropriate to change the wording to read, or something similar: <i>"Objective 5 – Recognises that the current level of abstraction is putting stress on in-stream values and that this should be addressed by increasing minimum flows over time. The 'returning' of water to the river will be via the means mentioned above, whereby lapsed, surrendered or cancelled</i>

Silver Fern Farms Pareora: Submission on Proposed Pareora Environmental Flows and Water Allocation Regional Plan

		It would seem appropriate to add to the explanation of the objective that an increase on flow from augmentation should not come at the detriment of water quality for users downstream. See suggested change for Objective 5 Explanation in the following submission.	consents are not reallocated for abstraction as part of the A Block. This should not however be at the detriment of water quality to users downstream. And any consequential amendments relating to this submission.
P15 /p6 /col1/ para5 Objective 5 Explanation	Support in part	Objective 5 promotes the returning of water to the river when possible. <i>“ ... returning water to the river when possible.”</i> The returning of water to the river from lapsed, surrendered or cancelled consents is supported fully; however, augmentation through the introduction of other sources of water would only be supported if the increase in flow not be at the detriment of water quality. The effects of upstream activities could diminish water quality for existing users downstream or down-gradient in the catchment. Being at the bottom of the catchment the cumulative effects could potentially be greater for Silver Fern Farms Pareora and could increase operational costs through the need for greater treatment of water to return it to the high quality required for food processing purposes. Policy 1.3 allows	It would seem appropriate to change the wording to read, or something similar: <i>“Objective 5 – Recognises that the current level of abstraction is putting stress on in-stream values and that this should be addressed by increasing minimum flows over time. The ‘returning’ of water to the river will be via the means mentioned above, whereby lapsed, surrendered or cancelled consents are not reallocated for abstraction as part of the A Block. This should not however be at the detriment of water quality to users downstream.”</i>
P16 /p6/ col1/ para1 Policy 1.3	Support in part	<i>“ ...the taking or use of surface water which does not comply with the environmental flow and allocation regime set out in Table 1, where the take or use is a temporary take or diversion of water to allow for the maintenance, repair or replacement of existing infrastructure.”</i> Whilst this policy is generally supported the take/diversions should not be to the detriment of the water quality for those existing users downstream/down-gradient. Diminished quality of water available for abstraction could	It would seem appropriate to change the wording to read, or something similar: <i>“ ...the taking or use of surface water which does not comply with the environmental flow and allocation regime set out in Table 1, where the take or use is a temporary take or diversion of water to allow for the maintenance, repair or replacement of existing infrastructure and not adversely diminish the water quality for users downstream.”</i> And any consequential amendments relating to this submission.

Silver Fern Farms Pareora: Submission on Proposed Pareora Environmental Flows and Water Allocation Regional Plan

P16 /p7 Policy 1.4	Support	adversely affect operations at Silver Fern Farms Pareora. It is suggested that the policy includes that the take/diversion is not to adversely affect water quality. Policy 1.4 deals with non-consumptive uses, covering activities which involve a temporary take and then discharge back of surface water. This policy is supported in its entirety, in particular part (c) which states: <i>“The take or use does not adversely affect in-stream values or any other lawfully established water take or use.”</i> In-stream values include amenity value, a component of which is water quality. Adversely affected in-stream values in the form of water quality would have an adverse effect on operations at Silver Fern Farms Pareora. Being at the bottom of the Pareora River catchment, Silver Fern Farms Pareora relies on upstream users not depleting water quality.	No change required.
P16/ p7/col2/ para4 Policy 1.7	Oppose in part	Silver Fern Farms objects in part to Policy 1.7. The policy states that: <i>“Notwithstanding Policy 1.2 above, to allow the taking or use of surface water and hydraulically connected groundwater from within the Pareora River Catchment which does not comply with the environmental flow and allocation regime set out in Table 1, where the take or use is for an existing, lawfully established take or use is for an existing, lawfully established community supply, and the consent holder has an approved asset management plan which outlines measures to reduce water use during times of low flow.”</i> There is a strong reliance on water from the Pareora River	It would seem appropriate to change the wording to read, or something similar: <i>“Notwithstanding Policy 1.2 above, to allow the taking or use of surface water and hydraulically connected groundwater from within the Pareora River Catchment which does not comply with the environmental flow and allocation regime set out in Table 1, where the take or use is for an existing, lawfully established community supply or industrial purpose, and the consent holder has an approved asset management plan which outlines measures to reduce water use during times of low flow.”</i> And any consequential amendments relating to this submission. Including a definition of industrial encompassing

		Catchment to satisfy the needs of operations at Silver Fern Farms Pareora. Restrictions on water abstraction at periods of low flow could impact on the production capacity of the facility. The plant is 100 years old and in the time it was designed water was not deemed to be a restrictive resource and therefore the plant was designed to use a lot of water. Whilst water conservation improvements are constantly being made this is limited somewhat by age and design. Silver Fern Farms Pareora is located on the coast at the bottom of the catchment, below the State Highway 1 Bridge <i>"from which point the river gains flow all the way to the coast"</i> (Part 5 Issue 1). Water for the Silver Fern Farms Pareora operations is predominantly abstracted from an infiltration gallery directly linked to the surface flow of the Pareora river; this is supplemented by the abstraction from two deep bores. The majority of water is used for the hygienic slaughter and dressing of livestock and the processing of associated by-products. A secure supply of quality water is essential to ensure that strict regulatory food safety requirements can be met in order to produce safe, high quality product for the export market. The success and viability of the plant directly affects the farmer/suppliers in the area, by providing a value adding service, in close proximity, negating additional transport costs. Paddocks are irrigated with waste water, and fresh water is used for the flushing of irrigation lines and to prevent paddocks going into water deficit. This is important as during periods of water deficit the ability of the pasture to remove nutrients from the waste water applied over the year is limited. Generally periods of water deficit coincide with climatic conditions that support high growth rates and therefore maximum nutrient uptake; maximising plant growth is important to maintain appropriate soil nutrient balances.	meat processing and ancillary activities.
--	--	--	---

Silver Fern Farms Pareora: Submission on Proposed Pareora Environmental Flows and Water Allocation Regional Plan

P17 /p6/ col1/ para4 Policy 1.9	Support in part	It is therefore proposed that the water take for Silver Fern Farms Pareora is included in policy 1.7 to ensure security of supply without reductions during times of low flow. For consistency the same terminology as written in the consent (industrial purpose) is proposed. Whilst Silver Fern Farms supports this policy on water conservation grounds, this rule does not allow for any additional allocation. Without the possibility of further water allocation, future operations and any potential expansion plans will be restricted. This could potentially affect the future viability of operations at Silver Fern Farms Pareora which has ramifications for farmer suppliers in the wider region who utilise the meat processing facility. Policy 1.9 states that: <i>"To limit the amount of water allocated in any new consent that replaces an expiring consent to take water within the A Block set out in Table 1, to no more than the rate of take used under the previous consent."</i> Silver Fern Farms object to this policy. With no scope for additional water allocation, any future expansion of operations may be restricted. There are two possible proposals for this policy: 1. Delete the entire policy 2. Add an exception into the policy that excludes the consent for industry covered under rule 2.3 (to be proposed later in this submission). The justification for this action is that the Silver Fern Farms Pareora take is at the bottom of the catchment where the river enters the sea. The effect on river health is minimal as it enters the sea shortly after the abstraction point and there are no users/ takes downstream to affect.	It would seem appropriate to change the wording to read, or something similar: <i>"To limit the amount of water allocated in any new consent that replaces an expiring consent to take water within the A Block set out in Table 1, to no more than the rate of take used under the previous consent. Except in the case of industrial supply activities covered under rules 2.2a</i> And any consequential amendments relating to this submission. NB. Rule 2.2a is a new rule proposed in a submission made on Rule 2.3 (P22/p7 /col2/ para7)
---	--------------------	---	---

P17 /p6/ col1/ para4	Oppose in part	Policy 1.10 states that: <i>“To limit the total volume of surface water abstracted for any lawfully established consent used for irrigation purposes from within the Pareora River Catchment to an annual volume calculated using Schedule 2 of this Plan.”</i> Silver Fern Farms object in part to this policy. The Silver Fern Farms Pareora consent to take and use water states that: <i>“Water shall be used for industrial purposes and irrigation of pasture”.</i> Paddocks are irrigated with waste water, and fresh water is used for the flushing of irrigation lines and to prevent paddocks going into water deficit. This is important as during periods of water deficit the ability of the pasture to remove nutrients from the waste water applied over the year is limited. Generally periods of water deficit coincide with climatic conditions that support high growth rates and therefore maximum nutrient uptake; maximising plant growth is important to maintain appropriate soil nutrient balances. The irrigation of pasture is an ancillary activity and is not the primary purpose for the abstraction of water, due to this and the location of the point of abstraction, it is argued that any potential restrictions to be applied to water abstracted for irrigation should not apply to Silver Fern Farms Pareora. However, Silver Fern Farms will voluntarily reduce water use where possible in periods of low water flows. It is proposed that as a way to address this objection a new rule be added, Rule 2.2a, which would mean this policy would no longer apply and no change be (see submission for P22/s7 /col2 Rule 2.3 Discretionary Activities)	No change is required to Policy 10 itself however, it would seem appropriate to add an additional rule to read, or something similar: “Rule 2.2a <i>The taking, using or diverting of surface water for industrial water supply, provided it complies with all of the following standards and terms:</i> Standards and Terms: (a) When a new consent is sought to replace an expiring consent, or an expired consent that is continuing to be exercised under section 124 of the RMA, the rate of take and volume are the same or less than that which was previously granted; (b) The consent holder has provided the Canterbury Regional Council with an asset management plan, which clearly states what steps will be taken to reduce water usage during times of low flow; and The Canterbury Regional Council will restrict the exercise of its discretion when deciding to grant or refuse a resource consent, and in imposing any conditions, to the following matters: • The reasonable need for the quantities of water sought, the intended use of the water and the ability of the applicant to abstract those quantities including whether storage of water is proposed; • The availability and practicality of using alternative supplies of water; • The intended use of the water and the technical efficiency of the exercise of the consent;
-------------------------	-------------------	--	--

		• <i>The effects the take has on surface water flows, including floods and freshes;</i> • <i>The effects the take has on any other authorised takes;</i> • <i>The management of supply during times of low flow; and</i> • <i>The collection, recording, monitoring and provision of information concerning the exercising of the consent.</i> And any consequential amendments relating to this submission. NB. The addition and justification of this rule are outlined in the submission on Rule 2.3 (P22/p7 /col2/ para7) No change is required to rule 2.3 however, it would seem appropriate to add another rule to read, or something similar: “Rule 2.2a <i>The taking, using or diverting of surface water for industrial water supply, provided it complies with all of the following standards and terms:</i> Standards and Terms: <i>(a) When a new consent is sought to replace an expiring consent, or an expired consent that is continuing to be exercised under section 124 of the RMA, the rate of take and volume are the same or less than that which was previously granted;</i> <i>(b) The consent holder has provided the Canterbury Regional Council with an asset management plan, which clearly states what steps will be taken to reduce water usage during times of low flow; and</i> <i>The Canterbury Regional Council will restrict the exercise</i>
P18 / p6/ col2/ para2 Policy 1.18	Oppose	Silver Fern Farms object to Policy 1.18, which states that: <i>“To limit the maximum rate of take of any surface water and hydraulically connected groundwater abstracted under any lawfully established A Block consent used for irrigation from within the Pareora River Catchment to 50% of the consented maximum rate of take as per Table 1, unless the consent holder is part of a Water Users Group approved by the Canterbury Regional Council which gives effect to the environmental flow and allocation regime in Table 1”</i> Silver Fern Farms object to this policy. The Silver Fern Farms Pareora consent to take and use water states that: <i>“Water shall be used for industrial purposes and irrigation of pasture”.</i> Paddocks are irrigated with waste water, and fresh water is used for the flushing of irrigation lines and to prevent paddocks going into water deficit. This is important as during periods of water deficit the ability of the pasture to remove

	nutrients from the waste water applied over the year is limited. Generally periods of water deficit coincide with climatic conditions that support high growth rates and therefore maximum nutrient uptake; maximising plant growth is important to maintain appropriate soil nutrient balances. As the irrigation of pasture is not the primary purpose for the abstraction of water and due to the location of the point of abstraction, it is argued that any potential restrictions to be applied to water abstracted for irrigation should not apply to Silver Fern Farms Pareora. However, Silver Fern Farms will voluntarily reduce water use where possible in periods of low water flow. It is proposed that as a way to address this issue without changing the policy that a new rule be added into Restricted Discretionary Activities, Rule 2.2a(see submission for P22/s7 /col2 Rule 2.3)	<i>of its discretion when deciding to grant or refuse a resource consent, and in imposing any conditions, to the following matters:</i> <i>• The reasonable need for the quantities of water sought, the intended use of the water and the ability of the applicant to abstract those quantities including whether storage of water is proposed;</i> <i>• The availability and practicality of using alternative supplies of water;</i> <i>• The intended use of the water and the technical efficiency of the exercise of the consent;</i> <i>• The effects the take has on surface water flows, including floods and freshes;</i> <i>• The effects the take has on any other authorised takes;</i> <i>• The management of supply during times of low flow; and</i> <i>• The collection, recording, monitoring and provision of information concerning the exercising of the consent."</i> And any consequential amendments relating to this submission. NB. The addition and justification of this rule are outlined in the submission on Rule 2.3 (P22/p7 /col2/ para7)
Part 7 - Rules		
P22/p7 /col2/ para1	Support	Silver Fern Farms support this rule in regards to the importance placed on the provision of security for community supply of water.
Rule 2.2		
P22/p7 /col2/ para7	Oppose in part	Whilst Silver Fern Farms generally supports this rule it does object to the part of the rule that states:
		No change required
		No change is required to rule 2.3 however, it would seem appropriate to add another rule to read, or something similar:

Rule 2.3	"The Canterbury Regional Council will restrict the exercise of its discretion when deciding to grant or refuse resource consent and in imposing any conditions, to the following matters... • The reduction in the rate of take in times of low flow..." Silver Fern Farms object to this part of the rule as operations at Silver Fern Farms Pareora could be affected with the restriction on water abstraction in times of low flow. There is a strong reliance on water from the Pareora River Catchment to satisfy the needs of operations at Silver Fern Farms Pareora. Restrictions on water abstraction at periods of low flow could impact on production capacity. Security of water supply without restrictions during times of low flow is essential to the viability of the facility. It is therefore proposed that an additional rule be added taking the form of Rule 2.2 for the taking or use of surface water for community supply, which does not reduce the allowable take but does impose management of supply (through the promotion of water conservation measures) during low flow. The rationale supporting the addition of a new rule is: 1. Less than minor effect on river health and downstream users - The take for Silver Fern Farms Pareora is at the bottom of the catchment. Silver Fern Farms Pareora is located on the coast at the bottom of the catchment, below the State Highway 1 Bridge "from which point the river gains flow all the way to the coast" (Part 5 Issue 1). Water for Silver Fern Farms Pareora operations are predominantly abstracted from an infiltration gallery alongside the Pareora River directly linked to the surface flow of the Pareora River and largely recharged by the River's flow.	"Rule 2.2a <i>The taking, using or diverting of surface water for industrial water supply, provided it complies with all of the following standards and terms:</i> Standards and Terms: (a) <i>When a new consent is sought to replace an expiring consent, or an expired consent that is continuing to be exercised under section 124 of the RMA, the rate of take and volume are the same or less than that which was previously granted;</i> (b) <i>The consent holder has provided the Canterbury Regional Council with an asset management plan, which clearly states what steps will be taken to reduce water usage during times of low flow; and</i> <i>The Canterbury Regional Council will restrict the exercise of its discretion when deciding to grant or refuse a resource consent, and in imposing any conditions, to the following matters:</i> • <i>The reasonable need for the quantities of water sought, the intended use of the water and the ability of the applicant to abstract those quantities including whether storage of water is proposed;</i> • <i>The availability and practicality of using alternative supplies of water;</i> • <i>The intended use of the water and the technical efficiency of the exercise of the consent;</i> • <i>The effects the take has on surface water flows, including floods and freshes;</i>
-----------------	--	---

	Due to the position of the Silver Fern Farms Pareora take there are no downstream users/ takes and the effect on the health of the river is minimal as it flows into the sea shortly after the point of abstraction. Although the water take for Silver Fern Farms Pareora does not affect any downstream water users/takes, it is recognised that the Silver Fern Farms operation restricts take upstream by limiting the take of other users by them having to leave enough flow to maintain flow for takes downstream.	• <i>The effects the take has on any other authorised takes;</i> • <i>The management of supply during times of low flow; and</i> • <i>The collection, recording, monitoring and provision of information concerning the exercising of the consent."</i> And any consequential amendments relating to this submission.
	2. Importance of Security of Supply - a restriction on water has the potential to reduce the production capacity of the facility which would have ramifications for the wider community. With dry conditions, farmers often off-load additional stock to reduce pressure on feed and water supplies. A reduction in processing capacity could disrupt scheduled processing, which would mean stock scheduled for processing may have to remain on the farms and it also may not be possible for farmers to off-load any additional stock. Therefore increasing pressure on farm abstraction for drinking water and irrigation water to keep paddocks viable for feed.	
	3. Importance of quality of supply - The water abstracted from the infiltration gallery is supplemented by abstraction from two deep bores. The deep bores draw water from a secure aquifer round 110m. Until the 2008/09 season the bore water was only used in the stockyards partly due to quality issues (inc. turbidity, colour and manganese content). All water is now treated and mixed in a reservoir for distribution. Good quality water is essential in meeting New Zealand and Overseas food safety requirements. Reducing the allowable take from the river would increase the reliance of abstraction from the bores	

	where water quality cannot be guaranteed 100% of the time.	
	4. Water Use - the Silver Fern Farms Pareora consent to take and use water states that <i>"water shall be used for industrial purposes and irrigation of pasture"</i>. Paddocks are irrigated with waste water, fresh water is used for the flushing of irrigation lines and to prevent paddocks going into water deficit, which would affect the ability of the pasture to remove nutrient from the waste water effluent. This is important as during periods of water deficit the ability of the pasture to remove nutrients from the waste water applied over the year is limited. Generally periods of water deficit coincide with climatic conditions that support high growth rates and therefore maximum nutrient uptake; maximising plant growth is important to maintain appropriate soil nutrient balances. The irrigation of pasture is not the primary purpose for the abstraction of water and due to the location of the point of abstraction; it is argued that any potential restrictions to be applied to water abstracted for irrigation should not apply to Silver Fern Farms Pareora. In summary, security of water supply without restrictions during times of low flow can be justified by weighing the relatively large impact a reduction in take could cause to the operation and wider community, against the minimal effect that non restricted flow would have on the river and other users due to the location of the abstraction within the catchment. This being said, Silver Fern Farms will voluntarily reduce water use where possible in periods low water flows.	
Part 8 - Definitions	Silver Fern Farms generally supports Part 8.	No change required

Silver Fern Farms Pareora: Submission on Proposed Pareora Environmental Flows and Water Allocation Regional Plan

P28/ p8 Definitions	In light of the proposed Silver Fern Farms submission on policy 1.7, adding <i>“industrial purposes”</i>, to include the Silver Fern Farms Pareora operation, a definition of industrial purposes is needed. The definition is a combination of that from 2 of the Resource Management Act 1991 and the Proposed Ashburton District Plan	It would seem appropriate to add a definition worded, or something similar: <i>“Industrial purpose means for the primary purpose of manufacturing, fabricating, processing and packing, from the receipt or raw material to the dispatch or use in another process or disposal of any product or waste material of every part of a process, and any associated storage of the raw material, partly processed matter, or product.”</i>
P28/ p8 Definitions	Silver Fern Farms has made several submissions on policies (1.17, 1.10 and 1.18) dealing with the reduction of take for irrigation during low flow. There is no definition of irrigation included in the plan. Without a definition, it is unclear as to whether these policies would apply to activities at Silver Fern Farms Pareora, and its consent to take water. Irrigation is not the primary purpose of the consent to take water at Silver Fern Farms Pareora. However, the consent does state that one of the purposes for the water take is for the irrigation of pasture. The consent has a daily volume of take that must not be exceeded but, there is no specific allocation for the purpose of irrigation. Water is primarily extracted for industrial purposes. The irrigation activities undertaken, at Silver Fern Farms Pareora, are utilised as a disposal method for waste water effluent from the processing operations. Water for irrigation is used for; the flushing of lines; and to supplement the waste water to avoid moisture deficit. It is important to avoid moisture deficit during key growth periods in order to maximise growth, and therefore nutrient takeoff. Silver Fern Farms believe the intention of the term in the plan was to convey irrigation in the traditional sense, of using abstracted water to apply to the soil, and would not include the	It would seem appropriate to add a definition worded, or something similar: <i>“Irrigation is the artificial application of water to soil, to assist in the growing of agricultural crops, not including irrigation undertaken for the purposes of effluent disposal/application of nutrients.”</i> And any consequential amendments relating to this submission. NB. Possibly need additional definitions for water and effluent/waste water.

	irrigation of waste water effluent.	
P28/ p8 Definitions	Silver Fern Farms propose that a definition be added for the term irrigation. The definition should be such that there is a clear distinction between the irrigation of water and irrigation for other purposes such as the disposal of effluent. No suitable definition for irrigation could be found in The Resource Management Act (1991), or other planning documents searched on the Environment Canterbury website. Silver Fern Farms proposed that the outmoded term "freezing works" be replaced by more appropriate terminology i.e. "Meat Processing Facility". It is proposed that a definition of "Meat processing facility" is added to accompany the new terminology. A definition has been taken from the Proposed Ashburton District Plan.	It would seem appropriate to add a definition worded, or something similar: <i>"Meat Processing Facility – means the use of a site for the yarding and slaughtering of animals; the associated processing of meat including fish processing, stock finishing, by-product and co-product processing; rendering; fellmongery, tanning, casing and pelt processing; and the associated chilling, freezing, packaging and storage of meat and associated products; and the treatment and disposal of effluent from the above processes."</i>