

## Gay Gibson

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**From:** Anita Murrell <anita.murrell@pork.co.nz>  
**Sent:** Friday, 24 October 2014 10:59 a.m.  
**Subject:** Submission on V2 to Canterbury LWRP  
**Attachments:** V2 to Canterbury LWRP Hinds Oct 2014.docx

**Categories:** Purple Category

Good Morning,

Please find attached NZPork's submission on V2.

Kind regards,

Anita Murrell

Environmental Advisor

New Zealand Pork

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24 October 2014

New Zealand

Dear Sir / Madam

**Proposed Variation 2 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



Anita Murrell

Environmental Advisor

Phone: 04 917 4752, email: [anita.murrell@pork.co.nz](mailto:anita.murrell@pork.co.nz)

**SUBMISSION ON Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan**

**TO:** Environment Canterbury  
PO Box 345  
Christchurch 8140  
New Zealand

**SUBMISSION ON:** Variation 2 to the Proposed Canterbury Land and Water Regional Plan

**SUBMITTER:** NZ Pork Industry Board

**CONTACT DETAILS:**

NZPork  
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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 New Zealand Pork Industry Board (NZPork) is a statutory board funded by producer levies. It actively promotes “100% New Zealand Pork” to support a sustainable and profitable future for New Zealand grown pork. The board’s statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

Nationally there are less than 110 registered commercial pork producers, comprising a relatively small but significantly integrated sector of the New Zealand Agricultural economy.

New Zealand pork producers are facing a number of economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand’s total pork consumption has increased significantly in recent years, placing further demands on producers who have responded by developing increasingly efficient systems. Currently, nearly all pork produced in New Zealand is consumed locally and makes up approximately 51% of the domestic market supply.

Pig Farmers in New Zealand have a firm grasp of environmental issues, especially water quality and quantity pressures. They demonstrate a high level of innovation and environmental stewardship, particularly in regard to manure and nutrient management which has important implications for water quality. The New Zealand pork industry has committed significant time and resource to Sustainable Farming Fund projects centered on nutrient management and environmental initiatives. However, profit margins for the industry remain tight and dialogue with farmers indicates that compliance costs and uncertainty into the future are key issues.

(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	
13.1A Definitions, Page 2	Baseline Land Use	Oppose	Where a 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 include 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 fully operational.</u>
Page 3	Good Management Practice Nitrogen Loss Rates	Oppose	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. However, it is not reasonable to include Good Management Practice in the plan until it has been defined and quantified.	Delete all references to Good Management Practice until outcomes from the Matrix of Good Management project are known, then include Good Management Practice by way of a schedule 1 process.
13.4 Policies, page 4	13.4.11	Oppose in part	Current nutrient loss modelling estimates a risk of phosphorus loss, not an actual loss rate. If phosphorus loss rates cannot be measured, how can they be maintained?	Delete reference to phosphorus losses.
	13.4.13	Oppose in part	The Matrix of Good Management is not due to be codified in the plan until October 2016, therefore farmers may have only two months to ensure compliance with loss rates that are currently unknown. This is not sufficient time to implement changes to farm systems, which can take several months or even years to phase in.	Delete all references to Good Management Practice until outcomes from the Matrix of Good Management project are known, then include Good Management Practice and deadlines for compliance with nutrient loss rates by way of a schedule 1 process.

