

**From:** [ECInfo](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** FW: Ecan - Air Plan Submission EMAIL:03161712  
**Date:** Friday, 1 May 2015 4:34:09 p.m.  
**Attachments:** [{cid:image001.png@01D08422.32554D30}image001.png](#)  
[{cid:image002.png@01D08422.32554D30}image002.png](#)  
[{cid:92BFD880726C3D4892549D951CF4351E@ecan.govt.nz}S001v1-AK136878-01-sub-eih.pdf](#)  
**Importance:** Low

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Hi Mailroom,

Can you please TRIM and workflow this submission?

Thanks

Charles

----- Original Message -----

**From:** Hayward Emma-Jane

**Received:** 1/05/2015 4:16 p.m.

**To:** ECInfo; Environment Canterbury; Services Customer; Services Customer

**Subject:** Ecan - Air Plan Submission

Good Afternoon,

I am working on behave of the Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand.

Please find attached, a submission on the Proposed Canterbury Air Regional Plan. Under Clause 6 of the First Schedule to the Resource Management Act 1991.

Can you please confirm acceptance by email once you have received the submission.

Please do not hesitate to contact me if you have any questions.

Kind Regards,



**EMMA-JANE HAYWARD**

**Planner**

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All our emails and attachments are subject to [conditions](#).

## Submission

# ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN



Under Clause 6 of the First Schedule to the Resource Management Act 1991

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**TO** Environment Canterbury Regional Council  
**SUBMISSION ON** Proposed Canterbury Air Regional Plan  
**NAME OF SUBMITTER** Egg Producers Federation of New Zealand (Inc) ("EPFNZ")  
Poultry Industry Association of New Zealand (Inc) ("PIANZ")  
**ADDRESS** C/- Harrison Grierson Consultants Limited  
PO Box 5760  
Wellesley Street  
**Auckland**  
Attention: Emma-Jane Hayward

This is a submission on the Proposed Canterbury Air Regional Plan, ("Air Plan").

The submitters cannot gain an advantage in trade competition through this submission.

### **SUBMISSION IN SUPPORT:**

**1. The specific provisions of the proposal Air Plan that this submission relates to are:**

The entire Plan Change.

**2. EPFNZ and PIANZ submission is:**

The intensive poultry industry is a dynamic and expanding sector of New Zealand's primary production, which includes the production of both poultry meat and eggs.

EPFNZ and PIANZ have been involved in the development of regional air quality provisions in Canterbury, through involvement in the planning process on Chapter 3 (Air Quality) of the Natural Resource Regional Plan.

### **Provisions of the Air Plan supported by the Submitters**

The submitters are largely supportive of the notified Air Plan and very pleased to see that Council has adopted all of the requests made in November 2014 when the submitters provided feedback. The submitters support the intention of Air Plan, more specifically, the submitters support the following provisions:

- Definitions:
  - Free range poultry farming: The submitters support the definition of free range poultry and the three key requirements. Furthermore, happy with the words that the permanent vegetation exiting on the land, instead of have to covering the land.
  - Intensive poultry farming: The submitters support the definition of intensive poultry and that it only covers more than 10,000 birds as well as excludes free range farms and hatcheries.
  - More specifically the submitters support the exclusion of hatcheries from the definition of intensive poultry farming. Poultry hatcheries are facilities in which fertile eggs are incubated and hatched. Given that chicks will only stay in the hatcheries for up to a week before they are removed to a farm, odour discharges from hatcheries are negligible. Being less than a week old, the birds are small and without plumage. They require minimum feed only and will be held in

the same container until they get to a farm. Dust generated from chick fluff is largely internalised within the facilities or removed from air extraction systems with filters. It is appropriate that Hatcheries be considered as a permitted activity.

- Objective 5.8: The submitters support the intention of this objective, as it recognises that air quality expectations throughout the region differ due to location and the existing environment. This is important as rural odours are a reasonable expectation in the rural environment.
- Policy 6.8: The submitters support the intention of this policy to minimise the potential for reverse sensitivity and provide for future certainty.
- Policy 6.10: The submitters support the intention of this policy to ensure that best practice is utilised.
- Policy 6.19: The submitters support the intention of this policy of enabling discharge with the industrial area, as there are many processing plants within the region and its important to support the supply chain.
- Policy 6.26: The submitters support the intention of this policy to minimise the potential effects on the wider environment, by controlling offensive or objectionable contaminants within the boundary of the property of origin.
- Rules 7.60 and 7.61: The submitters support these rules in regards to permitted activities and restricted discretionary activities.
- Rule 7.62(1) and 7.63: The submitter supports the setback requirement from a sensitive activity.
- Schedule 2: Assessment of offensive and objectionable effects: The submitters support the use of assessment tools with evaluation criteria, and the removal of ranking criteria.

#### **Requested Changes to Air Plan Provisions**

Although the submitters are generally supportive of Air Plan, they consider that there are several amendments that should be made to provide greater clarity and strengthen the proposed provisions. The requested amendments are listed below:

#### Policy – Rural Discharge to Air

The submitters request an additional policy be added to incorporate concepts that are already mentioned in the objectives. This would reinforce, Objective 5.8.

*Rural Discharge to Air – Policy 6.26A*

*The discharge into air meets the amenity expectation of the zone into which the activity discharges.*

#### **3. The submitters seek the following relief from the Council:**

a) Adoption of the proposed Policy 6.26A.

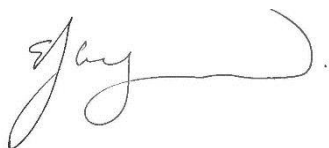
and

b) Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the submitter.

#### **4. The submitters wish to be heard in support of their submission.**

#### **5. If others make a similar submission the submitter will consider presenting a joint case with them at a hearing.**

Signature:



Date: 1<sup>st</sup> May 2015

**Address for Service of Submitter:**

Poultry Industry Association of New Zealand (Inc)

Egg Producers Federation of New Zealand (Inc)

C/- Harrison Grierson Consultants Limited

P O Box 5760

Wellesley Street

**Auckland 1121**

Attention: Emma-Jane Hayward

**Telephone:** 09 917 5000

**Facsimile/email:** [e.hayward@harrisongrierson.com](mailto:e.hayward@harrisongrierson.com)

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