

From: [Martina Armstrong](#)
To: [Mailroom Mailbox](#)
Subject: Proposed Canterbury Air Regional Plan Submission
Date: Friday, 1 May 2015 4:50:17 p.m.
Attachments: [Silver Fern Farms submission Proposed Canterbury Air Regional Plan 1 May 2015 FINAL.pdf](#)
[Silver Fern Farms Submission Form.pdf](#)

To whom it may concern,

Please find attached Silver Fern Farms submission on the Proposed Canterbury Air Regional Plan.

Kind regards,
Martina

**Martina
Armstrong**
Environmental Advisor

Mob: +64 27 532 9751
DDI: +64 3 972 5050

martina.armstrong@silverfernfarms.co.nz
www.silverfernfarms.co.nz

Silver Fern Farms Limited
283 Princes Street
PO Box 941, Dunedin 9054
New Zealand

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Submitter ID:

File No:

Submission on the Proposed Canterbury Air Regional Plan

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm, Friday 1 May 2015 to:

Freepost 1201
Proposed Canterbury Air Regional Plan.
Environment Canterbury
P O Box 345
Christchurch 8140

A

Full Name: Martina Armstrong **Phone (Hm):** _____

Organisation*: Silver Fern Farms Limited **Phone (Wk):** 03 972 5050

* the organisation that this submission is made on behalf of

Postal Address: PO Box 941, Dunedin 9054 **Phone (Cell):** 027 532 9751

Postcode: _____

Email: martina.armstrong@silverfernfarms.co.nz **Fax:** _____

Contact name and postal address for service of person making submission (if different from above):

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- I could not gain an advantage in trade competition through this submission; or
- I could gain an advantage in trade competition through this submission. **If you have ticked this box please select one of the following:**
- I am directly affected by an effect of the subject matter of the submission
 - I am not directly affected by an effect of the subject matter of the submission

Signature:  **Date:** 01/05/2015

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

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



Silver Fern Farms Limited
Head Office
283 Princes Street Dunedin 9016
New Zealand

TEL: +64 3 477 3980
FAX: +64 3 474 1087
www.silverfernfarms.com

Environment Canterbury
PO Box 345
CHRISTCHURCH 8140

mailroom@ecan.govt.nz

1 May 2015

RE: SILVER FERN FARMS SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

Silver Fern Farms owns and operates three meat processing sites located across the Canterbury region ("**Silver Fern Farms Belfast**", "**Silver Fern Farms Fairton**", "**Silver Fern Farms Pareora**" and "**Vital Petfood**"), as well as investment, partnership, and relationships in several other ancillary operations including our farmer suppliers.

Silver Fern Farms have welcomed the opportunity to be involved in providing feedback on the Proposed Canterbury Air Regional Plan.

Please feel free to contact Martina Armstrong, Environmental Advisor, on 027 532 9751 or email at martina.armstrong@silverfernfarms.co.nz if you have any questions regarding this matter.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Daryn Jemmett".

Daryn Jemmett
Group Environmental Manager
Silver Fern Farms Limited



100% MADE OF NEW ZEALAND

(1) The specific provisions of the proposal that my submission relates to are:		(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)		(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)
Page No. / Section No.	Sub-section / Point	Oppose/support (in part or full)	Reasons	
p.2-1 / s.2	Best Practicable Option / Item.2	Support in part	The best practicable option not entailing excessive costs is generally a widely overlooked aspect; inclusion of having regard to financial implications is an important consideration to retain.	Retain having regard to financial implications.
p.2-2 / s.2	Fertiliser	Oppose in part	In order to manage nutrients from processing wastewater Silver Fern Farms applies this to land as a nutrient source to grow plants, and remove the nutrients applied from the environment. It is unclear if this activity may fall within the bounds of this definition or not.	Clarify whether there is any intention, or not, to include land-based irrigation of processing wastewater within the bounds of the definition. If it is deemed to be included then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.
p.2-4 / s.2	Noxious or dangerous effect	Support in part	Environment Canterbury staff have previously in communications, to the public and to Silver Fern Farms, referred to parts of Silver Fern Farms activities as being 'noxious' without any merit or objective evidence; inclusion of a clear definition for noxious is important to avoid the incorrect usage of that term.	Retain the existing definition for Noxious that it means an outcome where material harm will occur.
p.2-5 / s.2	Stock holding area	Oppose	Given there are new rules in the proposed plan in respect to stock-holding areas there is some uncertainty if the definition proposed includes or excludes stock holding areas at meat processing plants, as these may be on hard-surface and/or bare soil.	Amend the definition to exclude stock-holding areas at meat processing operations.



p.2-6 / s.2	Waste management	Oppose in part	In order to manage nutrients from processing wastewater Silver Fern Farms applies this to land as a nutrient source to grow plants, and remove the nutrients applied from the environment. It is unclear if this activity may fall within the bounds of this definition or not.	Clarify whether there is any intention, or not, to include land-based irrigation of processing wastewater within the bounds of the definition. If it is deemed to be included then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.
p.3-2 / s.3	Immediate effect	Oppose	Silver Fern Farms considers that the merits of making the proposed plan have immediate effect is somewhat flawed. That is does the whole of the Canterbury Region need immediate legal protection that is not already provided by the operative plan. In addition, timing aspects of the proposed plan appear to be in contradiction with timing aspects of the Canterbury Land and Water Plan. Immediate effect prior to any submissions and consequential changes may mean that parties are applying for consents that may not be required once decisions on those submissions are made.	Whilst may be a moot point as the immediate legal effect has taken place, but is important consideration that appears to be overlooked.
p.6-1 / s.6	s.6.6 / Appropriate location	Support	Silver Fern Farms operations are located in the appropriate zones for the activities being carried out, however given developments surrounding those zones there is increasing potential for reverse sensitivity. The ongoing provision for industrial zones and providing operational certainty through longer consent durations is supported.	Retain policy.
p.7-1 / s.7 Rules	s.7.3	Oppose	Given a number of Silver Fern Farms operations in Canterbury are greater than 100 years old this means that others have located in proximity to our operations overtime and as such open up the potential for reverse sensitivity issues.	Amend the rule to accommodate odour boundaries being outside the boundary of the property of origin as a discretionary activity rather than non-complying.



			<p>Given this Environment Canterbury has granted resource consents where the boundary for the effect of potential odours is outside the boundary of the property of origin; this is to capture those parties establishing on a location in full knowledge of the existing activities in the zone that they should appropriately internalise the reverse sensitivity concerns rather than externalising that on the existing operation.</p> <p>The rule as written does not provide for this situation as a discretionary activity as it should.</p>	
p.7-1 / s.7 Rules	s.7.4 (11)	Oppose	<p>In 2008 Silver Fern Farms undertook a joint venture in Otago to commission a bubbling fluidised bed boiler that uses sludge recovered from wastewater treatment. This technology burns solid fuels in an air-suspended bed of particles fuelled by a combination of dewatered meat processing plant wastewater sludge and wood residues for use in steam production. Separate fuel handling systems can be used for either sludge or wood residues in order to provide maximum flexibility in fuel mixtures.</p> <p>The environmental benefits are achieved by decreased consumption of a high sulphur content coal and the reduction in particulate emissions from the site through the use of a baghouse filter.</p> <p>The rule as written would cause impediments for this innovative boiler to be utilised in Canterbury for other non-industrial purposes. This appears somewhat counter to the intent of the plan to allow for industrial innovation that may occur within or external to the property of an industrial or trade premise, e.g., it could occur in a rural area .</p> <p>Provision needs to be provided in rules that enable innovation and technology along a number of areas rather</p>	<p>Amend rule to allow for the burning of sludge from industrial processes outside of that property boundary, and potentially other as yet unidentified innovations, as a discretionary activity.</p>



			than being prohibited outright.	
p.7-4 / s.7 Rules	s.7.14	Oppose	<p>Given the NESAQ provides a GLC PM10 limit of 50µg/m³ averaged over a 24 hour period, it is unclear how 2.5µg/m³ PM10 over no defined period is being applied.</p> <p>No basis to the application of 2.5µg/m³, 5% of the NESAQ limit, as a trigger value for determining permitted status versus discretionary status has been provided. Without this it is difficult to make a judgement whether this is a sound decision or not.</p> <p>On face value, and based on potential effects of such a low GLC, Silver Fern Farms considers this is not a sound trigger value to apply.</p>	Amend rule by increasing the GLC PM10 trigger value between permitted and discretionary activity to a more reasonable and understandable value.
p.7-5 / s.7 Rules	Missing rule		<p>Given that coal is widely used in industrial boiler operations, it would seem appropriate that provision for use of coal as a fuel source at a permitted activity status level is provided.</p> <p>Silver Fern Farms assumes this is just an oversight as a result of an administrative error.</p>	Add permitted activity level rule for coal as a fuel source.
p.7-5 / s.7 Rules	s.7.19	Support in part	<p>The net energy output of less than or equal to 5MW is appears an appropriate value as the threshold between permitted and discretionary activities.</p> <p>However, Silver Fern Farms would like to bring attention to the inconsistent application of net energy output thresholds between fuel sources.</p>	Amend rules 7.20 / 7.21 / 7.22 to a net energy output of less than or equal to 5MW to standardise with this rule.
p.7-6 / s.7 Rules	s.7.19 (3)	Oppose	<p>For an industrial operation it is highly unlikely that there will not be any building less than 5m in height within a 25m radius of an emission stack.</p> <p>Assuming the concern is related to potential for disturbance of the stack emission, it would seem more</p>	Delete rule.



			appropriate the key parameter should be the height of the stack above the nearest buildings rather than the height of the building. If that is the case this is already provided for in s.7.19 (5).	
p.7-6 / s.7 Rules	s.7.20 (4)	Oppose	For an industrial operation it is highly unlikely that there will not be any building less than 5m in height within a 25m radius of an emission stack. Assuming the concern is related to potential for disturbance of the stack emission, it would seem more appropriate the key parameter should be the height of the stack above the nearest buildings rather than the height of the building. If that is the case this should be provided for in s.7.20 (7) as is provided for gas (s.7.19 (5)).	Delete rule and consequentially amend s.7.20 (7), or something similar.
p.7-6 / s.7 Rules	s.7.20 (7)	Oppose in part	See comment for s.7.20 (4) above.	See comment for s.7.20 (4) above.
p.7-6 / s.7 Rules	s.7.21	Support in part	The net energy output of less than or equal to 5MW is inconsistent with that provided for other fuels as the threshold between permitted and discretionary activities.	Amend rules 7.20 / 7.21 / 7.22 to a net energy output of less than or equal to 5MW to standardise with this rule.
p.7-6/ s.7 Rules	s.7.21 (5)	Oppose	For an industrial operation it is highly unlikely that there will not be any building less than 5m in height within a 25m radius of an emission stack. Assuming the concern is related to potential for disturbance of the stack emission, it would seem more appropriate the key parameter should be the height of the stack above the nearest buildings rather than the height of the building. If that is the case this should be provided for in s.7.21 (8) as is provided for gas (s.7.19 (5)).	Delete rule and consequentially amend s.7.21 (8), or something similar.
p.7-7 / s.7 Rules	s.7.21 (8)	Oppose in part	See comment for s.7.21 (5) above.	See comment for s.7.21 (5) above.
p.7-7 / s.7 Rules	s.7.22	Oppose in part	Silver Fern Farms has trialled at one of our operations outside of Canterbury the conversion of an existing coal boiler to one utilising wood pellets. As such the goal has	Amend rule to a net energy output of less than or equal to 5MW to standardise with other fuel source rules.



			<p>been to maintain the energy output of the boiler under the different fuel source.</p> <p>Given this it would seem appropriate that the net energy output threshold between a permitted activity and a discretionary activity should be the same irrespective of the fuel source. Silver Fern Farms suggest this threshold should be standardised at 5MW as provided for gas (s.719).</p>	
p.7-7 / s.7 Rules	s.7.22 (6)	Oppose	<p>For an industrial operation it is highly unlikely that there will not be any building less than 5m in height within a 25m radius of an emission stack.</p> <p>Assuming the concern is related to potential for disturbance of the stack emission, it would seem more appropriate the key parameter should be the height of the stack above the nearest buildings rather than the height of the building. If that is the case this should be provided for in s.7.22 (9) as is provided for gas (s.7.19 (5)).</p>	Delete rule and consequentially amend s.7.29 (9), or something similar.
p.7-8 / s.7 Rules	s.7.22 (9)	Oppose in part	See comment for s.7.22 (6) above.	See comment for s.7.22 (6) above.
p.7-9 / s.7 Rules	s.7.25	Oppose in part	<p>Silver Fern Farms recently were required to install a 900kW emergency generator after a substation transformer failed. This generator was provided within a purpose built self-contained container shell, where the electricity supplier located it next to the failed transformer and cabled it directly into the existing lines network.</p> <p>Given this, the temporary generator facility was located between existing buildings and infrastructures and therefore likely to fail to meet several of the control elements listed, e.g., (1) height of stack / radius from buildings.</p> <p>In light of the emergency nature of the event, and the fact this was well managed by the electricity supplier it would seem inappropriate to require resource consent for such</p>	Amend conditions to those that would be appropriate in such an emergency event to allow it to occur as permitted.



			an activity.	
p.7-10 / s.7 Rules	s.7.29	Oppose	<p>Given a number of Silver Fern Farms operations in Canterbury are greater than 100 years old this means that others have located in proximity to our operations overtime and as such open up the potential for reverse sensitivity issues.</p> <p>Given this Environment Canterbury has granted resource consents where the boundary for the effect of potential odours is outside the boundary of the property of origin; this is to capture those parties establishing on a location in full knowledge of the existing activities in the zone that they should appropriately internalise the reverse sensitivity concerns rather than externalising that on the existing operation.</p> <p>The rule as written does not recognise that odour beyond the boundary of the property in certain circumstances should be a permitted activity where it is a well-established activity and others moved into the area in full knowledge of that.</p>	Amend the rule to accommodate odour boundaries being outside the boundary of the property of origin as a permitted activity in certain circumstance, or something similar.
p.7-12 / s.7 Rules	s.7.36 (2)	Oppose	Engineering workshops at industrial premises generally are unfiltered. Requiring these to be filtered and tested is excessive when the emissions from these sources are generally low velocity and localised to within the industrial property.	Delete rule condition 2.
p.7-13 / s.7 Rules	s.7.38	Oppose in part	<p>It is unclear whether the term “bulk solid materials” may encompass the generation, storage and handling of compost or not.</p> <p>Silver Fern Farms currently operates composting facilities at two of our operations in Canterbury which may be captured by this rule if applied to composting activities.</p>	Clarify what is meant by “bulk solid materials”. If it is deemed to include compost then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.
p.7-14 / s.7 Rules	s.7.42	Oppose in part	It is unclear whether the term “wood waste” may	Clarify what is meant by “wood waste”. If it is deemed to



			<p>encompass the generation, storage and handling of compost or not as this contains bark and/or wood shavings.</p> <p>Silver Fern Farms currently operates composting facilities at two of our operations in Canterbury which may be captured by this rule if applied to composting activities.</p>	<p>include compost then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.</p>
p.7-14 / s.7 Rules	s.7.44	Support in part	<p>Silver Fern Farms process petfood between 1t and 10t of animal matter per day and support the recognition of this activity as being a permitted activity.</p>	<p>Support recognition as permitted activity.</p>
p.7-17 / s.7 Rules	s.7.52	Support in part	<p>Silver Fern Farms support the recognition of ventilation of buildings on industrial premises as being a permitted activity.</p>	<p>Support recognition as permitted activity.</p>
p.7-19 / s.7 Rules	s.7.59	Oppose in part	<p>Silver Fern Farms does not support the term “Freezing Works” as this refers to historical industry and is somewhat derogatory to modern meat processing operations.</p> <p>Whilst there may be aspects of modern meat processing operations that require resource consent, there are also many aspects that meet permitted activity status.</p> <p>Given this Silver Fern Farms considers the inclusion of the industry in the table is somewhat outdated and instead reference should be to specific activities that may require consenting now more largely due to scale than anything else.</p>	<p>Delete “Freezing works” from the table.</p>
p.7-21 / s.7 Rules	s.7.66	Oppose in part	<p>Silver Fern Farms as a meat processing operator requires stockholding areas at our processing operations to receive stock from our farmer suppliers. As such these industrial premises are deemed to be ‘urban’.</p> <p>In the context that this rule resides within the rural section of the proposed plan it is however unclear if rule s.7.66 applies to Silver Fern Farm stockholding activities or not.</p>	<p>Clarify whether there is any intention, or not, to include meat processing stockholding within the bounds of this rule. If it is deemed to be included then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.</p>



p.7-21 / s.7 Rules	s.7.67	Oppose in part	<p>Silver Fern Farms as a meat processing operator requires stockholding areas at our processing operations to receive stock from our farmer suppliers. As such these industrial premises are deemed to be 'urban'.</p> <p>In the context that this rule resides within the rural section of the proposed plan it is however unclear if rule s.7.67 applies to Silver Fern Farm stockholding activities or not.</p>	<p>Clarify whether there is any intention, or not, to include meat processing stockholding within the bounds of this rule. If it is deemed to be included then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.</p>
p.7-21 / s.7 Rules	s.7.68	Oppose in part	<p>Silver Fern Farms discharge liquid wastewater from the cleaning of stockholding areas alongside processing wastewater to land as a nutrient source.</p> <p>In the context that this rule resides within the rural section of the proposed plan it is however unclear if rule s.7.68 applies to Silver Fern Farm land-based wastewater irrigation activities or not.</p>	<p>Clarify whether there is any intention, or not, to include meat processing land-based wastewater irrigation within the bounds of this rule. If it is deemed to be included then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.</p>
p.7-22 / s.7 Rules	s.7.69	Oppose in part	<p>Silver Fern Farms discharge liquid wastewater from the cleaning of stockholding areas alongside processing wastewater to land as a nutrient source.</p> <p>In the context that this rule resides within the rural section of the proposed plan it is however unclear if rule s.7.69 applies to Silver Fern Farm land-based wastewater irrigation activities or not.</p>	<p>Clarify whether there is any intention, or not, to include meat processing land-based wastewater irrigation within the bounds of this rule. If it is deemed to be included then there may be other consequential changes Silver Fern Farms require in the proposed plan as a result.</p>
p.8-1/ s.8 Schedules	Schedule 1	Oppose in part	<p>From experience, Silver Fern Farms considers one key parameter has been overlooked.</p> <p>Given the potential for reverse sensitivity matters arising for discharges to air of odour and/or dust due to previous poor zone adherence, there needs to be recognition in applications and assessment of effects of NIMBY situations as a result.</p> <p>In these situations being prevalent, there is generally a clear bias which significantly diminishes some of the information to be gathered from people that may be</p>	<p>Add into Schedule of the need to recognise NIMBY situations in applications and assessment of effects.</p>



			affected by a discharge.	
p.8-6/ s.8 Schedules	Schedule 2	Oppose in part	<p>From experience with using many of the techniques listed in this schedule to assess effects, Silver Fern Farms considers one key parameter has been overlooked.</p> <p>Given the potential for reverse sensitivity matters arising for discharges to air of odour and/or dust due to previous poor zone adherence, there needs to be recognition in assessments of effects of NIMBY situations as a result.</p> <p>In these situations being prevalent, there is generally a clear bias which significantly diminishes some of the information to be gathered from people that may be affected by a discharge.</p> <p>Not all tools are of value in some situations, and therefore it is best to conduct a mix and match of tools for the situation rather be forced through a specific list of tools to carry out.</p>	Add into Schedule of the need to recognise NIMBY situations in the choice of methods / tools used to assess effects.
p.8-6/ s.8 Schedules	1 Site investigation response to complaints	Support in part	<p>At times Silver Fern Farms has experienced a lack of notification regarding complaints made and the resultant investigation carried out by the CRC officer.</p> <p>Silver Fern Farms support advising the alleged offender of complaints and investigations as soon as possible.</p> <p>However, given the transient nature of odour / dust issues 24 hours is possibly too long a lag-time to notify a complaint. If notification is made early, and is a result of an activity under control of the alleged offender, then corrective action may be able to be taken sooner than later.</p>	Amend item 3 to suggest notification to the alleged offender in the same hour as received, and at the latest within 24 hours.
p.8-6/ s.8 Schedules	1 Site investigation response to complaints	Oppose in part	At times Silver Fern Farms has experienced where a complaint was made and our operation was listed as the potential offender. On investigation the CRC officer determined either another party as the offender, or could	Amend schedule to include requirement for CRC officer to correct database and remove alleged offender if it not upheld.



			<p>not identify an issue or offender.</p> <p>However, the CRC complaints database is not corrected to remove Silver Fern Farms as the potential offender. This incorrect information has been released by CRC to media requests resulting in incorrect articles and public concern being placed on our operations than is appropriate.</p> <p>Given this, an element needs to be included in this schedule for the CRC officer to correct the complaints database to reflect findings and removed reference to alleged offender if the findings do not corroborate.</p>	
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