

**From:** [Tami Woods](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** DairyNZ submission on the proposed Canterbury Air Regional Plan  
**Date:** Thursday, 30 April 2015 9:56:59 p.m.  
**Attachments:** [DairyNZ submission on Proposed Canterbury Air Regional Plan \(Final\).pdf](#)

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Please find attached a copy of DairyNZ's submission on the proposed Canterbury Air Regional Plan.

**Tami Woods**

Policy Manager

***DairyNZ***

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Environment Canterbury  
PO Box 345  
Christchurch 8140

30 April 2015

**RE: SUBMISSION on Proposed Canterbury Regional Air Plan**

Dear Sir/Madam

DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milksolids and through government investment, our purpose is to secure and enhance the profitability, sustainability and competitiveness of New Zealand dairy farming. We deliver value to farmers through leadership, influencing, investing, partnering with other organisations and through our own strategic capability. Our work includes research and development to create practical on-farm tools, leading on-farm adoption of best practice farming, promoting careers in dairying and advocating for farmers with central and regional government.

DairyNZ strongly supports policy that is founded on rigorous and robust science. Our policy positions are built on expert technical analysis of regional and farm-scale economic data, farm systems knowledge, farmer behavior and science. For more information, visit [www.dairynz.co.nz](http://www.dairynz.co.nz).

To follow is DairyNZ's submission on the Proposed Canterbury Air Regional Plan. Our feedback specifically focuses on the provisions in the Plan around odour management. DairyNZ acknowledges the importance of managing odour around the collection, storage and treatment of animal effluent. Our interest is around ensuring that the Proposed Canterbury Air Regional Plan does this in a manner that results in the most effective adoption of good management practices and behavior change where required.

Yours sincerely

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## **DAIRYNZ SUBMISSION**

### **Dairy sector research, programmes and work**

#### **Research and environmental programmes**

DairyNZ recognises that beyond supporting the economic well-being of New Zealand's urban and rural communities, the dairy sector must responsibly manage its environmental footprint. The Strategy for Sustainable Dairy Farming 2013-2020 ("Making Dairy Farming Work for Everyone") signals the intent of dairy farming to be a part of New Zealand's future for the long term. One of the strategy's key objectives is "environmental stewardship" meaning the "responsible use and protection of the natural environment through sustainable practices and conservation. Wise use of resources means using them sustainably for the greatest good."<sup>1</sup>

To this end, the dairy industry has substantially increased the level of investment it is making in programmes and initiatives aimed at enhancing the environmental performance of dairy farms, through the adoption of good management practice. DairyNZ is involved in a wide variety of extension activities to support good environmental management including providing advice to farmers on effluent management (including the management of odour), nutrient use and efficiency, water and feed management.

#### **Effluent management initiatives and the management of odour**

DairyNZ has recently led development of a range of initiatives to improve effluent management including an Institution of Professional Engineers New Zealand (IPENZ) practice note for the design of effluent storage ponds released in October 2011. Associated with this programme is a training course on the design and construction of effluent storage ponds developed in partnership with Infratrain. DairyNZ has also partnered with Massey University to develop a course on the design of effluent systems. Milk supply companies are involved in a number of initiatives to improve effluent management. The investment that the dairy sector is making to improve effluent management has been matched by farmer investment in new infrastructure, training and technology. A warrant of fitness system for dairy effluent management systems has also been developed. This involves training and accreditation of rural professionals to support farmers' management of dairy effluent. DairyNZ has also recently released an Effluent Technical Note on Odour Management for Storage Ponds. The Technical Note helps identify what the problem is, what is causing the problem and management options. It also sets out steps to avoid pond odour problems from the outset.


#### **Sustainable Milk Plans**

DairyNZ has developed a flagship environmental farm planning tool described as a Sustainable Milk Plan. These plans include targets and actions that are farm specific and practical to help landowners focus on the actions that are essential to minimise their environmental footprint.

Sustainable Milk Plans identify specific targets that focus on key environmental outcomes and performance measures that take account of the sensitivity of the local environment. These plans can help farmers focus on practical actions that they can take to improve issues. This includes management of odour as part of overall effluent management. The Effluent Technical Note on Odour Management for Storage Ponds is an important resource in identifying practical actions.

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<sup>1</sup> [http://www.dairynz.co.nz/page/pageid/2145862755/Dairy\\_Industry\\_Strategy](http://www.dairynz.co.nz/page/pageid/2145862755/Dairy_Industry_Strategy)



One of the advantages of the development of the Sustainable Milk Plans is that through the process of their development, farmers' understanding of the links between their farm business and environmental outcomes is increased. Additionally, through ongoing auditing and monitoring, valuable information is provided on environmental performance, rates of change and barriers to change. In this manner, improvements can be made to help the development and implementation of plans.

The DairyNZ Sustainable Milk Plan has been approved by Environment Canterbury's Chief Executive as meeting the requirements of a Farm Environment Plan as described in Schedule 7 Part A of the Proposed Canterbury Land and Water Regional Plan.

DairyNZ is in the process of training farm consultants to deliver Sustainable Milk Plans across the region. To date, we have prioritised the implementation of Sustainable Milk Plans in the Hurunui and Selwyn catchments. It has been agreed with Environment Canterbury that we will continue to support the implementation of Sustainable Milk Plans in line with the requirements for farm environment plans as specified in the Proposed Land and Water Regional Plan.

In contrast to the staged requirements for farm environment plans in the Proposed Land and Water Regional Plan, the Canterbury Air Regional Plan proposes that an Odour Management Plan (or Farm Environment Plan that addresses odour management) is to be in place immediately. Given the availability of experienced rural professionals to support the implementation of farm environment plans and the other requirements of the Proposed Land and Water Regional Plan, DairyNZ is concerned that inconsistencies between both planning instruments will adversely impact on the effective and efficient delivery of farm environment plans in Canterbury.

### **Concerns and relief sought on provisions to the Proposed Canterbury Air Regional Plan**

Table 1 sets out DairyNZ's concerns with the provisions of the Proposed Canterbury Air Regional Plan and the relief DairyNZ seeks in response to the concerns raised. Every attempt has been made to provide specific relief where possible, including proposed replacement drafting. However, DairyNZ is conscious that there are, in many cases, multiple ways its concerns could be addressed and it would accept alternative drafting that has the same, or similar, effect as that suggested in the Table 1.

Similarly, while every effort has been made to ensure coherency is maintained (between related policies and between policies and associated rules) it may be that technical or consequential amendments are required to give full effect to the matters raised in this submission that are not identified in Table 1. For the avoidance of doubt, DairyNZ seeks and supports (in principle) any such consequential amendments.

DairyNZ wishes to be heard in support of its submission.

If others make a similar submission, DairyNZ would be prepared to consider preparing a joint case with them at any hearing.

**Table 1 – DairyNZ’s provision-by-provision submission points**

Page	Reference	Issue/Concern	Relief Sought
<b>SECTION 6 Policies: Central Policies Applying to All Activities</b>			
6-1	6.10	<p>Policy 6.10 uses ‘best practicable option’ which is relevant for industrial or trade process discharges.</p> <p>DairyNZ considers the phrase ‘good management practices’ would be more appropriate for rural activities consistent with DairyNZ’s programmes and initiatives, the proposed Canterbury Land and Water Regional Plan and the Matrix of Good Management project.</p>	<p>Amend policy 6.10 and add a new policy 6.10a as follows:</p> <p><i>6.10 <del>All activities</del> <u>Industrial and trade process</u> that discharge into air apply, at least, the best practicable option so that cumulative effects are minimised.</i></p> <p><i><u>6.10a Good management practice is adopted by rural activities that discharge odour, dust or smoke in the rural environment.</u></i></p>
<b>SECTION 7 Rules: Rural discharges to air</b>			
7-21	7.66	<p>DairyNZ considers that Rule 7.66 focuses on managing the wrong activity. The issue will not necessarily be with the actual ‘structure’, but the effluent containment associated with it and/or when that effluent is then spread onto land and it is noted that this issue is already being managed by Rule 7.68. In addition, the buffer distance from a property boundary is also considered overly restrictive, particularly in the context of a property bounding a road.</p>	<p>Delete Rule 7.66; or</p> <p>Alternatively amend Rule 7.66 to focus on the activity to which odour will arise from (the collection storage, treatment and application onto land of animal effluent associated with structures accommodating cattle for more than 12 hours at a time); and</p> <p>Amend condition 1 as follows:</p> <p><i>...<del>500-250</del>m from the property boundary and 1500m from any land zoned for urban use.</i></p>
7-21	7.67	<p>As noted above for Rule 7.66 DairyNZ considers that this rule focuses on managing the wrong activity. The issue will not necessarily be with the actual ‘structure’, but the effluent</p>	<p>Make consequential amendments to Rule 7.67 to reflect changes sought to Rule 7.66 above.</p>

		containment associated with it and/or odour issues when that effluent is then spread onto land.	
7-21/22	7.68	<p>As noted above (page 3 of this submission) DairyNZ considers that the requirement for having an Odour Management Plan in place needs to be aligned with the timing of Farm Environment Plans under the proposed Land and Water Regional Plan.</p> <p>Conditions 4 and 5 detail specific requirements for pH and dissolved oxygen in liquid or slurry effluent. DairyNZ considers these to be inefficient monitoring requirements, where an odour issue does not exist.</p> <p>Under Rule 7.3 if the activity results in offensive or objectionable beyond the boundary of the property of origin, the activity will be assessed as non-complying. In this instance it may be appropriate for the Council to include conditions on any consent if granted in line with conditions 4 and 5.</p> <p>It is also noted that the way Rule 7.68 is worded, the proposed requirements for pH and dissolved oxygen would also apply to raw effluent prior to any treatment which would be unworkable (i.e. the collection and storage of liquid and slurry animal effluent or solid animal effluent).</p> <p>Condition 6 will require a duplication of record keeping that already forms part of any discharge permit (to land in circumstances where it may enter water) or could form part of information collected as part of a Farm Environment Plan/Odour Management Plan.</p>	<p>Amend Rule 7.68 as follows:</p> <p>7.68 The discharge of contaminants into air from the collection, storage, treatment and application of liquid and slurry animal effluent or solid animal effluent onto production land, is a permitted activity provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. The discharge does not cause a noxious or dangerous effect; and</li> <li>2. <del>From 1 January 2017,</del> An odour management plan prepared in accordance with Schedule 2 is held by the persons responsible for the discharge, and where a Farm Environment Plan is required pursuant to Rule 5.45 of the Land and Water Regional Plan, the odour management plan will be a component of that Plan; and</li> <li>3. The odour management plan is supplied to the CRC on request;<del>and</del></li> <li>4. <del>The pH range of the liquid or slurry effluent is between pH6.5 and pH8; and</del></li> <li>5. <del>Dissolved oxygen is present in liquid or slurry effluent at concentrations greater than 1ppm; and</del></li> <li>6. <del>The persons responsible for the effluent application will keep a record for 3 months, to be provided to the CRC on request, of the effluent discharged including the following information: (a) the type of effluent applied to land; and (b) the estimated daily quantity of effluent applied to land in cubic metres; and (c) the location of the effluent application; and (d) the wind direction at the time of application.</del></li> </ol>
<b>SECTION 8 Schedules: Schedule 2 Assessment of offensive and objectionable effects Rules: Rural discharges to air:</b>			



8-17	Content of dust, odour and smoke management plans	DairyNZ supports how Schedule 2 'Content of dust, odour and smoke management plans' states that an Odour Management Plans can form part of a Farm Environment Plan prepared and implemented in accordance with Schedule 7 Part A of the Canterbury Land and Water Regional Plan.	Retain ability for an Odour Management Plans to form part of a Farm Environment Plan prepared and implemented in accordance with Schedule 7 Part A of the Canterbury Land and Water Regional Plan.
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