

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-399
<b>Response Date</b>	1/05/15 1:01 PM
<b>Consultation Point</b>	13 MANDATORY INFORMATION ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### 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

### To Be Heard

**Please select the appropriate option from the following:**  I DO wish to be heard in support of my submission;

**If so**  I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-392
<b>Response Date</b>	1/05/15 12:57 PM
<b>Consultation Point</b>	1 Introduction ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

P 1-3, paragraph 8.

"Discharges of odour in rural areas have, in the past, been associated mainly with intensive pork and poultry farming."

The section 32 report states that "The operative Air Plan included provisions for managing the effects of intensive farming and these provisions generally worked well." NZPork therefore questions the accuracy and usefulness of stating that rural odour discharges have historically been associated with pig and poultry farming. This draws unfair attention to these farming systems and will cause negative bias towards them. In the case of indoor pig farming, little odour escapes the buildings and any issues may be realted to effluent storage and application as opposed to the farming activity itself. Effluent is

often transported and applied away from the main pig farming operation, and therefore is a separate activity.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Remove historical negative reference to pig and poultry farming and replace with "Discharges of odour in rural areas can be associated with a variety of farming practices, including land use intensification."

Provide reference to evidence supporting any claims of historical cause, for example environmental incident or complaint reports. State actual activities causing odour discharge rather than general farming activity, for example effluent application.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-393
<b>Response Date</b>	1/05/15 12:58 PM
<b>Consultation Point</b>	Table 2.1 General Definitions ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Extensive Pig Farming definition - this is consistent with industry good management practice.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Retain the definition of Extensive Pig Farming as proposed.

### Air Shed

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-394
<b>Response Date</b>	1/05/15 12:58 PM
<b>Consultation Point</b>	Table 2.1 General Definitions ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Intensive Pig Farming definition.

This definition uses the measure of maintenance of ground cover, which is consistent with industry agreed good management practice.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Retain a definition of intensive pig farming which uses a measure of maintenance of ground cover.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-395
<b>Response Date</b>	1/05/15 12:59 PM
<b>Consultation Point</b>	7.11 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** . Support

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Biosecurity is vital for pig farmers. NZPork supports a permitted activity rule for carcass disposal by burning for biosecurity reasons.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Retain permitted activity rule.

### Air Shed

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-396
<b>Response Date</b>	1/05/15 12:59 PM
<b>Consultation Point</b>	7.7 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** . Support

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Biosecurity is vital for pig farmers. NZPork supports a permitted activity rule for carcass disposal by burning for biosecurity reasons.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Retain permitted activity rule.

### Air Shed

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-397
<b>Response Date</b>	1/05/15 1:00 PM
<b>Consultation Point</b>	Proposed Canterbury Air Regional Plan ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

The New Zealand Pork Industry Board (NZPork) is a producer board whose statutory function is to act in the best interests of pig farmers to attain the best possible net on-going returns while supporting sustainable farming into the future. Canterbury is an important region for pig farming in New Zealand, with approximately 60% of the national pig herd residing within Environment Canterbury's jurisdiction.

The Section 32 report states that a copy of the Draft Air Plan was provided to NZPork on 17 October 2014. This is not the case, and NZPork was asked for comment on the draft plan only via Federated Farmers on 10 November 2014, the day comments on the draft closed.

NZPork believes that the Proposed Canterbury Air Plan is inconsistent with the Natural Resources Regional Plan, in contravention of section 67(4) of the Resource Management Act (1992) and amendments are necessary.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Submission points as detailed following.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

<b>Consultee</b>	Mrs Anita Murrell (61382)
<b>Email Address</b>	anita.murrell@pork.co.nz
<b>Company / Organisation</b>	NZ Pork
<b>Address</b>	PO Box 4048 Level 4 Wellington 6140
<b>Event Name</b>	Proposed Canterbury Air Regional Plan
<b>Submission by</b>	NZ Pork (Mrs Anita Murrell)
<b>Submission ID</b>	pCARP-398
<b>Response Date</b>	1/05/15 1:01 PM
<b>Consultation Point</b>	7.60 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

In the Operative Natural Resources Regional Plan, piggeries established prior to 2002 are a permitted activity if there has been no increase in the scale, intensity, frequency or duration of the effects. In the Proposed air plan the intent of this rule has been changed, and it now states that there must not have been an increase in scale of the farming activity, yet how scale is measured is not defined and therefore interpretation of the rule is difficult.

It is not clear whether an increase in scale may be interpreted as an increase in pig numbers, an increase in farm or building size or even an increase in staffing levels. NZPork submits that the permitted activity rule would be more effective and easier to interpret if it referred to an increase in effects of the discharge as in the NRRP. Making the application of this new rule retrospective is also against the principles of natural justice.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Amend rule 7.60 (1) to read:

From 1 June 2002 there has been no increase in the scale of the effects of the farming activity where the discharge originates.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**