

**From:** [Anita Murrell](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** V3 to Canterbury LWRP Waitaki May 2015  
**Date:** Monday, 25 May 2015 2:11:51 p.m.  
**Attachments:** [V3 to Canterbury LWRP Waitaki May 2015.docx](#)

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Please find attached a submission from NZPork

Kind regards,

**Anita Murrell**  
Environmental Advisor

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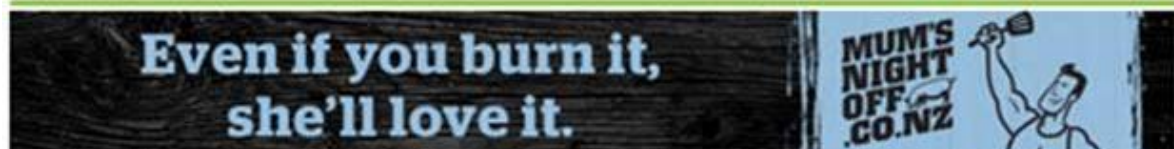
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25 May 2015

New Zealand

Dear Sir / Madam

**Proposed Variation 3 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 Three.

We have reviewed the proposals for their impact on pig farming in the area.

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

A handwritten signature in black ink, appearing to read "Anita Murrell".

Anita Murrell

Environmental Advisor

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

**SUBMISSION ON Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan**

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

**SUBMISSION ON:** Variation 3 to the Proposed Canterbury Land and Water Regional Plan

**SUBMITTER:** NZ Pork Industry Board

**CONTACT DETAILS:**

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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  
25 May 2015

## **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	Subsection/Point	Oppose/Support	Reasons	
15.1 Definitions	Existing Farming Activity	Support	NZPork supports enabling the continuing operation of existing farming activities.	Retain definition of existing farming activity
	Flexibility Cap	Oppose	Nitrogen loss rate is not currently defined in the pLWRP	Change nitrogen loss rate to nitrogen loss calculation
	Maximum cap	Oppose	An absolute maximum loss rate cannot be defined when the only available tools for calculating nitrogen loss have a margin of error of up to 30%	Delete all references to maximum cap
15.7.6 Water Quality Limits and Targets	Table 15 (m) and 15 (n)	Oppose	It is not clear whether the flexibility and maximum cap limits refer to estimated nitrogen loss below the root zone, to ground water or application to land.	Clearly define what the tables refer to, for example "Estimated Nitrogen Loss Below The Root Zone Flexibility Cap Limits".
Schedule 24b – Farm Practices		Support	NZPork supports the use of good management practices to manage the effects of farming on the environment. NZPork particular supports the requirement for effluent systems installed after the plan is made operative to meet the required standard, rather than making the requirement retrospective.	Retain non-retrospective requirement for effluent systems to meet the required standard.