

From: [Claire Hunter](#)
To: [Mailroom Mailbox](#)
Cc: [Frances Wise <FRANCESW@alliance.co.nz>](mailto:FRANCESW@alliance.co.nz) (FRANCESW@alliance.co.nz)
Subject: Alliance Group Limited - Further Submissions
Date: Thursday, 9 July 2015 1:37:30 p.m.
Attachments: [05 Final Further Submissions Canterbury Air Plan 09.07.15.pdf](#)

Please find attached further submissions lodged on behalf of Alliance Group Limited with respect to the Proposed Canterbury Regional Air Plan.

Kind regards,
Claire

Claire Hunter
Mitchell Partnerships Ltd
PO Box 489
DUNEDIN

Phone: +64 3 477 7884
Mobile: +64 21 996 473
Fax: +64 3 477 7691
Email: claire.hunter@mitchellpartnerships.co.nz
Web: www.mitchellpartnerships.co.nz

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SUBMISSION FORM 6

CLAUSE 8 OF FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

FURTHER SUBMISSION ON THE PUBLICLY NOTIFIED PROPOSED CANTERBURY REGIONAL AIR PLAN

To: Environment Canterbury
PO Box 345
CHRISTCHURCH

Submission on: Proposed Canterbury Regional Air Plan (Proposed Air Plan)

Name: Alliance Group Limited (Alliance)

Address: PO Box 1410
INVERCARGILL
(Note different address for service)

1. These further submissions are in support or opposition to submissions made on the Proposed Air Plan.
2. Alliance is a person who has an interest in the Proposed Air Plan that is greater than the interest of the general public.
 - Alliance was established in 1948 and is based in Invercargill, New Zealand. Alliance is one of the world's largest processors and exporters of sheep meat, with eight processing plants strategically located throughout the South Island and lower North Island. Approximately 7 million lambs, 1 million sheep, 140,000 cattle and 80,000 deer are processed annually, with a significant proportion of this volume in Southland plants.
 - The company is a farmer owned co-operative with over 6000 farmer shareholders. More than 90% of the stock supplied to the company for processing comes from shareholders. Alliance produces 27% of New Zealand's sheep meat production, 6% of its beef production, and 15% of its venison production.
 - Alliance's Smithfield Plant is situated approximately 3km north of Timaru. This plant was established on this site in 1885, and currently processes sheep and lamb, and deer and is Alliance's only processing plant in the Canterbury region.
 - The plant employs approximately 500 people at the peak of the season and contributes significantly to the local and regional economy.

- In order to operate its plant Alliance holds a number of resource consents issued by Environment Canterbury. This includes a discharge to air consent (CRC921864.2). This consent enables the operation of the Plant's coal fired boiler, and enables a number of onsite operations including processing and rendering activities. This consent expires in 2030. Against this background Alliance has an interest in the Proposed Air Plan.
3. Alliance will not gain an advantage in trade competition through these further submissions.
 4. **Further Submissions**
Alliance's further submissions on the Proposed Air Plan are set out in the table which is attached.
 5. Alliance does wish to be heard in relation to its submissions.
 6. If others make a similar submission Alliance will consider presenting a joint case with them at a hearing.

Signature:



By its authorised agent Claire Hunter, on behalf of
Alliance Group Limited

Date: on the 9th day of July 2015

Address for service: Alliance Group Limited
C/- Mitchell Partnerships
PO Box 489
DUNEDIN

Attn: Claire Hunter

Telephone: (03) 477 7884

Email: Claire.hunter@mitchellpartnerships.co.nz

TABLE 1: FURTHER SUBMISSIONS ON THE PUBLICLY NOTIFIED PROPOSED CANTERBURY REGIONAL AIR PLAN IN ACCORDANCE WITH CAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991

Alliance Group Limited

Plan Provision	Point ID	Submitter Name	Support/Oppose	Summary of Decision Requested	Alliance Group Limited Further Submission
Objectives					
New	pCARP-2182	Ballance Agri-Nutrients Limited	Oppose	Insert a new objective as follows: <u>Provide for industry and trade activities that rely on operational air discharges and that operate in accordance with industry best practice.</u>	Support
New	pCARP-2359	Carter Holt Harvey Pulp & Paper Ltd	Oppose	Insert a new objective as follows: <u>Industrial and rural activities are located within appropriate zones, to recognise the benefits</u>	Support
New	pCARP-2360	Carter Holt Harvey Pulp & Paper Ltd	Oppose	Insert a new objective as follows: <u>Incompatible land uses and activities are adequately separated to avoid, remedy or mitigate adverse effects of air discharges, and reverse sensitivity conflicts.</u>	Support
5.4	pCARP-1067	Horticulture Zealand	New Oppose	Amend Objective 5.4 as follows: <u>Discharges to air are managed to maintain the existing amenity values of the receiving environments in which they are located.</u>	Support

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Alliance Group Limited

				and to include descriptions of the amenity values for different receiving environments in the Plan.	
5.5	pCARP-2720	Ravensdown Fertiliser Cooperative Limited	Oppose	Amend Objective 5.5 as follows: Discharges to air do not adversely effect shall be managed in a way that <u>recognises and provides for</u> the relationship of Ngai Tahu with their culture and traditions with the air resource.	Support
5.7	pCARP-2722	Ravensdown Fertiliser Cooperative Limited	Oppose	Amend Objective 5.7 as follows: Nationally and regionally significant infrastructure, <u>as well as industry representing significant economic investment and benefits</u> , is enabled ...	Support
5.7	pCARP-2907	Gelita (NZ) Limited	Oppose	Amend Objective 5.7 as follows: Nationally and regionally significant infrastructure <u>and industry is enabled recognised and provided for such that they can be and is</u> resilient ...	Support
5.9	pCARP-2727	Ravensdown Fertiliser Cooperative Limited	Oppose	Provide alternative relief relating to submission point 2726 by amending Objective 5.9 as follows: <u>Working with district councils new</u> activities are spatially located so that they <u>do not</u> result in <u>reverse</u>	Support

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Alliance Group Limited

				<u>sensitivity issues with existing activities that have lawfully established air discharges and to ensure appropriate air quality outcomes are</u> being achieved both at present and in the future.	
Policies					
Central Policies Applying to All Activities	pCARP-2752	Straterra Inc	Oppose	Delete all policies that limit discharges of PM2.5 and instead adopt a policy that requires appropriate monitoring and assessment (to accurately characterise the scale of PM2.5 emissions, actual impacts on human health, and the appropriateness of adopting the WHO guidance values as guidelines) to be undertaken in airsheds and clean air zones prior to the introduction of rules.	Support
6.5	pCARP-711	Fonterra Co-operative Group Limited	Oppose	Delete Policy 6.5 and replace with the following: <u>Avoid discharges into air that are assessed as causing offensive or objectionable effects in accordance with Schedule 2.</u>	Oppose. This policy does not recognise that mitigation measures can be imposed in order to reduce the severity of effects arising from air discharges, including those that might be offensive or objectionable.

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6.6	pCARP-712	Fonterra Co-operative Group Limited	Oppose	Delete Policy 6.6 and replace with the following Policy: <u>Existing activities that discharge to air, including the re-consenting or expansion thereof, are to adopt the best practicable option to prevent or minimise any actual or likely adverse effect on the environment, so as to reduce the potential for reverse sensitivity effects.</u>	Oppose. Alliance is of the view that the primary focus of managing reverse sensitivity effects is to ensure that the encroachment of incompatible activities around existing air discharges is avoided.
6.7	pCARP-1118	Selwyn District Council	Oppose	Delete policy 6.7 and replace with the following: <u>"Take account of reverse sensitivity implications associated with existing activities when making decisions with respect to authorising land use changes, to ensure that any changes proposed will allow discharges from the existing activity to continue at the level that prevailed at the time that the changes were approved; or can reasonably be mitigated to reduce the adverse effects."</u>	Support
6.8	pCARP-714.	Fonterra Co-operative Group Limited	Oppose	Delete Policy 6.8 and insert the following: <u>Provide longer consent durations for the discharge of contaminants into air where the sensitivity of the receiving</u>	Support

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Alliance Group Limited

				<u>environment, the level of investment made in the activity and the ability to minimise adverse effects on air quality achieves sustainable management</u>	
6.10	pCARP-715	Fonterra Co-operative Group Limited	Oppose	Amend Policy 6.10 as follows: All activities that discharge into air apply, at least the best practicable option so that cumulative effects are minimised.	Support
6.11	pCARP-716	Fonterra Co-operative Group Limited	Oppose	Amend Policy 6.11 as follows: <u>Recognise the contribution of nationally and regionally significant infrastructure and large-scale industrial and trade activities to the regional and national economy and provide for the operation and development of that infrastructure.</u>	Support
6.11	pCARP-2738	Ravensdown Fertiliser Cooperative Limited	Oppose	Amend Policy 6.11 as follows: Recognise ... infrastructure and <u>large scale industrial and trade activities</u> to the regional and national economy and provide for the operation and development of that <u>those</u> infrastructure <u>and activities.</u>	Support

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6.12	pCARP-2701	Meridian Energy Ltd	Support	<p>Amend Policy 6.12 as follows:</p> <p>Recognise that there is likely to<u>in some circumstances that there may</u> be improvements in the management of the discharges of contaminants into air over the life of resource consents and <u>where appropriate</u> consider this for new and replacement consents.</p>	Support
Industrial and large scale discharges to air	pCARP-1714	Mr Fraser B Ross	Oppose	<p>Amend industrial policies to require industry and other facilities to operate within established guidelines, and to encourage or require industries to use best practicable guidelines so their emission levels are within the established limits. All such operations should be encouraged or required to use the best known technology currently available at the present time.</p>	<p>Oppose in part.</p> <p>Alliance is concerned that the requirement for all industry to use the best known technology in order to reduce emission levels does not properly take into account the level of effect generated by the air discharge, or consider the receiving environment in which the discharge is located. It also does not consider the costs associated with requiring such upgrades, which need to be balanced against the level of effect generated by the emission.</p>

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Alliance Group Limited

6.19	pCARP-789	St George's Hospital Limited	Oppose	Amend Policy 6.19 as follows: Enable discharges of contaminants associated with large scale <u>fuel burning devices</u> , industrial and trade activities and nationally and regionally significant <u>and critical infrastructure</u> , in locations <u>which are spatially appropriate for the activity where the discharge is compatible with the surrounding land use pattern and</u> while ensuring that adverse effects on air quality are <u>avoided, remedied or mitigated</u> .	Support
6.22	pCARP-512	Canterbury Development Corporation	Oppose	Amend Policy 6.22 to limit the scope of the requirement to polluted airsheds, as required by the Resource Management (National Environmental Standards for Air Quality) Regulations 2004, removing the extension of the requirements to Clean Air Zones.	Support
6.22	pCARP-1259	GL Bowron and Co Ltd	Oppose	Opposes application of offsets to the Washdyke airshed where the focus should be on the efficiency of industries.	Oppose. The outcome sought from this submitter is not consistent with the National Environmental Standard for Air Quality.

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6.22	pCARP-2211	Ballance Agri-Nutrients Limited	Oppose	Amend Policy 6.22 as follows: <u>Within Clean Air Zones, significant increases of PM10 concentrations from discharges of contaminants are to be offset in accordance with the Resource Management (National Environmental Standards for Air Quality) Regulations 2004. This policy shall not apply to facilities involving the handling and storage of fertiliser where products are approved under the Hazardous Substances and New Organisms Act 1996 and associated Regulations, and the use and discharge of the substance is in accordance with all conditions of the approval.</u>	Support in so far as this would apply to gazetted airsheds rather than Clean Air Zones.
6.22	Pcarp-1944	Straterra Inc	Oppose	Opposes application of offsets to the Washdyke airshed where the focus should be on the efficiency of industries.	Oppose. The outcome sought from this submitter is not consistent with the National Environmental Standard for Air Quality.

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Rules					
Industrial, trade and large scale discharges to air	pCARP-1930	Straterra Inc	Oppose	Ensure the CRL report (attached to submission), that concludes that many boiler operators in Canterbury would be required to adopt new technologies or innovation to meet new requirements of the plan and the cost of doing so is prohibitive in the majority of cases, is adopted.	Support
Industrial, trade and large scale discharges to air	pCARP-2416	Mrs Molly Melhuish	Oppose	Amend industrial and large scale discharges to air rules to apply sanctions to persistent industrial/commercial polluters, with warnings followed by fines if necessary.	Oppose. This is not considered necessary. The RMA already allows for enforcement action to be taken should any discharge breach the permitted standards or consented parameters.
Industrial, trade and large scale discharges to air	pCARP-2457	Silver Fern Farms Ltd	Oppose	Insert a rule that provides for coal use as a permitted activity.	Support
7.14	pCARP-725	Fonterra Co-operative Group Limited	Oppose	Provide alternative relief to deleting Rule 7.14 and amending airshed boundaries gazetted under the National Environmental Standards for Air Quality to match District Plan urban areas (point pCARP-724) as follows:	Support

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				<p>Within a Clean Air Zone <u>polluted airshed</u> as defined under Regulation 17 of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004, the discharge of PM10 into air from a large scale burning device, where concentrations of PM10 will likely be equal to or exceed 2.5 micrograms per cubic metre at ground level at or beyond the boundary of the property of origin, is a restricted discretionary activity provided the following condition is met:</p> <ol style="list-style-type: none"> 100% of the discharge will be off-set within the gazetted <u>polluted</u> airshed in accordance with Regulation 17 of the Resource Management (National Environmental Standards for Air Quality) Regulation 2004. <p>The exercise of discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> The proposal to off-set 100% of the emissions within the gazetted <u>polluted</u> airshed to ensure that there is no net 	
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Alliance Group Limited

				<p>increase of PM10 emissions; and</p> <p>2. The matters set out in rule 7.2.</p>	
7.14	pCARP-2147	Orion New Zealand Limited	Oppose	<p>Amend rule 7.14 to be compatible with regulation 17(1) and(2) of the National Environmental Standards for Air Quality which states:</p> <p>17 Certain applications must be declined unless other PM10 discharges reduced.</p> <p>(1) A consent authority must decline an application for a resource consent (the proposed consent) to discharge PM10 if the discharge to be expressly allowed by the consent would be likely, at any time, to increase the concentration of PM10 (calculated as a 24-hour mean under Schedule 1) by more than 2.5 micrograms per cubic metre in any part of a polluted airshed other than the site on which the consent would be exercised.</p> <p>(2) However, sub clause (1) does not apply if -</p>	Support

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				<p>(a) the proposed consent is for the same activity on the same site as another resource consent (the existing consent) held by the applicant when the application was made; and</p> <p>(b) the amount and rate of PM10 discharge to be expressly allowed by the proposed consent are the same or less than under the existing consent ; and</p> <p>(c) discharges would occur under the proposed consent only when discharges no longer occur under the existing consent.</p>	
7.14	pCARP-2456	Silver Fern Farms Ltd	Oppose	Amend Rule 7.14 by increasing the GLC [ground level concentration] PM10 trigger value between permitted and discretionary activity to a more reasonable and understandable value.	Support

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7.17	pCARP-728	Fonterra Co-operative Group Limited	Oppose	Amend Rule 7.17 as follows: The discharge of contaminants into air from a large scale solid fuel burning device or from an industrial or trade premise established prior to 28 February 2015 , outside a Clean Air Zone, that will likely result in <u>ambient air quality exceeding guideline</u> values, set out in the Ambient Air Quality Guidelines 2002 Update, being exceeded is a non-complying discretionary activity .	Support
7.17	pCARP-771	Lyttelton Port Company Limited	Oppose	Delete Rule 7.17.	Support
7.17	pCARP-2632	Lowe Corporation Limited and Colyer Mair Assets Limited	Oppose	Amend Rule 7.17 to discretionary activity.	Support
7.29	pCARP-2798	Ravensdown Fertiliser Cooperative Limited	Support	Retain the restricted discretionary activity status of Rule 7.29.	Support
7.52	pCARP-2479	Silver Fern Farms Ltd	Support	Supports permitted activity status for Rule 7.52.	Support
7.66	pCARP-2481	Silver Fern Farms Ltd	Oppose	Clarify if there is intention to include meat processing stockholding within Rule 7.66.	Support

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7.66	pCARP-2482	Silver Fern Farms Ltd	Oppose	Provide consequential relief regarding submission point 2481 if meat processing stockholding is deemed to be within the bounds of Rule 7.66.	Support
7.67	pCARP-2484	Silver Fern Farms Ltd	Oppose	Clarify if there is intention to include meat processing stockholding within Rule 7.67.	Support
7.67	pCARP-2486	Silver Fern Farms Ltd	Oppose	Provide consequential relief regarding submission point 2484 if meat processing stockholding is deemed to be within the bounds of Rule 7.67.	Support
7.68	pCARP-2487	Silver Fern Farms Ltd	Oppose	Clarify if there is intention to include meat processing land based wastewater irrigation in Rule 7.68.	Support
7.68	pCARP-2489	Silver Fern Farms Ltd	Oppose	Provide consequential relief regarding submission point 2487 if meat processing land based wastewater irrigation is deemed to be within the bounds of Rule 7.68.	Support
7.69	pCARP-2490	Silver Fern Farms Ltd	Oppose	Clarify if there is intention to include meat processing land based wastewater irrigation in Rule 7.69.	Support

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Alliance Group Limited

7.69	pCARP-2491	Silver Fern Farms Ltd	Oppose	Provide consequential relief regarding submission point 2490 if meat processing land based wastewater irrigation is deemed to be within the bounds of Rule 7.69.	Support
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