

From: [Ensor, Tim](#)
To: [Mailroom Mailbox](#)
Cc: [Jane Walsh](#)
Subject: ANZCO Foods Limited - PC4 Further Submissions
Date: Tuesday, 17 November 2015 3:04:28 p.m.
Attachments: [ANZCO further submissions Final 17_11_15.pdf](#)

Hi

Please find attached further submissions on behalf of ANZCO Foods Limited for PC4 to the LWRP.
Please confirm receipt of these submissions by return email.
Regards

Tim Ensor

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Further Submissions to Plan Change 4 to the Land and Water Plan

To: The Chief Executive Officer
Canterbury Regional Council
P0 Box 345
Christchurch 8140

Submitter: **ANZCO Foods Limited, CMP Canterbury Limited and Five Star Beef Limited (ANZCO)**

1. This is a further submission by ANZCO Foods Limited, CMP Canterbury Limited and Five Star Beef Limited (ANZCO) to Plan Change 4 (PC4 of the Land and Water Regional Plan
2. ANZCO have an interest in the proposal that is greater than the interest of the general public. This is because submissions have been made which, if relief is granted as sought, have the potential to positively or adversely impact on the ability of ANZCO to operate their business in an efficient and effective manner.
3. The table annexed as Appendix A and forming a part of this further submission contains:
 - 3.1 The submissions which ANZCO supports or opposes,
 - 3.2 The particular parts of those submissions supported or opposed,
 - 3.3 Reasons for support or opposition, and
 - 3.4 The decision sought by ANZCO (whether the submission should be allowed or disallowed).
4. ANZCO wishes to be heard in support of its further submission.
5. If others make a similar submission, ANZCO will consider presenting a joint case with them at a hearing.

Signed on behalf of
ANZCO



17 November 2015

Address for Service of Submitter:

c/- AECOM New Zealand Limited
PO Box 4479
Christchurch

Attn: Tim Ensor

Phone (03) 966 6173
Email tim.ensor@aecom.com

Appendix A: Further Submissions

Please note that the addresses of relevant submitters are contained at the end of this appendix.

Ref#	ANZCO supports or opposes the submission of:	The particular part of the submission ANZCO supports or opposes is:	The reasons for ANZCO's support or opposition are:	ANZCO seek the following:
1	Canterbury District Health Board #65911	Policy 4.13 PC4 LWRP-621	This submission point seeks to retain the addition of 4.13(e)(ii) as notified. As notified Policy 4.13 does not recognise that remedying or mitigating an effect may also be a viable consideration.	Oppose – Disallow submission point
2	Combined Canterbury Provinces, Federated Farmers of New Zealand #63238	Policy 4.13 PC4 LWRP-413	This submission point seeks to retain the addition of 4.13(e)(ii) as notified. As notified Policy 4.13 does not recognise that remedying or mitigating an effect may also be a viable consideration.	Oppose – Disallow submission point
		Region Wide Rules 5.128 PC4 LWRP-459	If there is no change in the physical nature of the consent (e.g. rate or volume of take) there should be no need to re-assess well interference effects. On this basis the submission is supported.	Support – Allow submission point
3	Demeter J #52312	Policy 4.13 PC4 LWRP-374	This submission point seeks to retain the addition of 4.13(e)(ii) as notified. As notified Policy 4.13 does not recognise that remedying or mitigating an effect may also be a viable consideration.	Oppose – Disallow submission point
		Region Wide Rules 5.91 PC4 LWRP-389	This submission seeks to include a clause that would indicate the contaminants that are acceptable or unacceptable. This list could end up being extensive and exclusive and would not necessarily improve the interpretation of the rule.	Oppose – Disallow submission point
4	Fish and Game Council North Canterbury #52310	Policy 4.13 PC4 LWRP-475	This submission seeks to remove the second priority wording from Policy 4.13 (ii), and sets an unreasonably high expectation for the management of contaminants and freshwater quality.	Oppose – Disallow submission point
5	Fonterra Limited #66006	Definition of Wastewater PC4 LWRP-240	This submission supports the revised wording of wastewater which will ensure that contaminants from industrial and trade waste processes are assessed under specific and more appropriate rules, rather than the rules relating to on-site wastewater systems. This submission is supported in so far as it supports this differentiation. However, ambiguity exists surrounding the reliance on undefined terms and on this basis the submission is opposed.	Oppose – Disallow submission point
6	Mackenzie District Council #53929	Definition of Community Water Supply PC4 LWRP-329	This submission seeks to delete all changes to community water supply. This does not recognise the importance of the community's reliance on water for uses such as livestock processing.	Oppose – Disallow submission point
		Region Wide Rules 5.115 PC4 LWRP-346	This submission seeks to delete the wording change of Rule 5.115. This is opposed as notified Schedule 25 assists in clarifying what water uses may occur as a community water supply and provides clarity and guidance for users.	Oppose – Disallow submission point

Ref#	ANZCO supports or opposes the submission of:	The particular part of the submission ANZCO supports or opposes is:	The reasons for ANZCO's support or opposition are:	ANZCO seek the following:
7	Oil Companies Z Energy, Mobil and BP #65931	Definition of Wastewater PC4 LWRP-402	This submission supports the revised wording of wastewater which will ensure that contaminants from industrial and trade waste processes are assessed under specific and more appropriate rules, rather than the rules relating to on-site wastewater systems. This submission is supported in so far as it supports this differentiation. However, ambiguity exists surrounding the reliance on undefined terms and on this basis the submission is opposed.	Oppose – Disallow submission point
		Policy 4.13 PC4 LWRP-415	This submission point seeks to retain the addition of 4.13(e)(ii) as notified. As notified Policy 4.13 does not recognise that remedying or mitigating an effect may also be a viable consideration.	Oppose – Disallow submission point
		Region Wide Rules 5.91 PC4 LWRP-422	This submission supports the removal of wastewater from industrial and trade waste rules. This will improve consistency and avoid duplication.	Support – Allow submission point
		Region Wide Rules 5.92 PC4 LWRP-423	This submission supports the removal of wastewater from industrial and trade waste rules. This will improve consistency and avoid duplication.	Support – Allow submission point
8	Rangitata Diversion Race Management Limited #56706	Policy 4.13 PC4 LWRP-362	This submission point seeks to retain the addition of 4.13(e)(ii) as notified. As notified Policy 4.13 does not recognise that remedying or mitigating an effect may also be a viable consideration.	Oppose – Disallow submission point
9	Royal New Zealand Forest and Bird Protection Society #52265	Policy 4.13 PC4 LWRP-131	This submission seeks to delete the second priority within Policy 4.13. This sets an unreasonably high expectation for the management of contaminants and freshwater quality.	Oppose – Disallow submission point
		Policy 4.49 PC4 LWRP-276	This submission seeks to exclude commercial uses from community water supplies, which disregards the use of water by commercial activities providing essential services to the community.	Oppose – Disallow submission point
		Region Wide Rules 5.115 PC4 LWRP-277	This submission seeks to include consideration of biodiversity within matters for discretion in rule 5.115. This is considered onerous given the rule seeks to control effects on community water supply.	Oppose – Disallow submission point
		Schedule 25 Water Supply Strategy PC4 LWRP-132	This submission seeks to require that the schedule contain a requirement to assess the environmental effects of the take. This would be undertaken as part of any resource consent required and does not therefore need to be included in the schedule.	Oppose – Disallow submission point
10	Silver Fern Farms Limited #65900	Definition of Animal Effluent PC4 LWRP-144	This submission supports addition of a definition for Animal Effluent and the inclusion of clarification that it does not include incidental animal effluent present in livestock processing waste streams. This assists in creating a clearer plan.	Support – Allow submission point
		Definition of Wastewater PC4 LWRP-145	This submission supports the revised wording of wastewater which will ensure that contaminants from industrial and trade waste processes are assessed under specific and more appropriate rules, rather than the rules relating to on-site wastewater systems. This submission is supported in so far as it supports this differentiation. However ambiguity exists surrounding the reliance on undefined terms and on this basis the submission is opposed.	Oppose – Disallow submission point

Ref#	ANZCO supports or opposes the submission of:	The particular part of the submission ANZCO supports or opposes is:	The reasons for ANZCO's support or opposition are:	ANZCO seek the following:
11	Horticulture New Zealand #57998	Schedule 25 PC4 LWRP-623	The submission seeks that Schedule 25(1) be amended to reduce consumption during water shortages for all uses. However this fails to recognise that livestock processors are essential users of water as farmers destock during droughts and there is an increased demand for livestock processing in water shortages.	Oppose – Disallow submission point
12	Beef & Lamb New Zealand #52292	Definition of earthworks PC4 LWRP-193	The submission point seeks to remove the notified addition that only cultivation on production land established prior to September 2015 be excluded. This would have the unintended consequence of requiring a new resource consent to be obtain for any new cultivation of soil on production land after this date.	Support – Allow the submission point

Addresses of submitters

Submitter	Address
Beef +Lamb New Zealand	Ms Victoria Lamb PO Box 121 Wellington 6140
Canterbury District Health Board	Ms Denise Tully Community & Public Health PO Box 1475 Christchurch 8140
Combined Canterbury Provinces, Federated Farmers of New Zealand	Mr Lionel Hume Federated Farmers of New Zealand PO Box 414 Ashburton 7740
Demeter J	Mrs Jane Demeter 117 Champion Street St Albans Canterbury Christchurch 8013
Fish and Game Council North Canterbury	Mr Scott Pearson PO Box 50 Canterbury Woodend 7641
Fonterra Limited	Fonterra Limited C/- Chapman Tripp PO Box 2510 245 Blenheim Road Christchurch 8140
Horticulture New Zealand	Ms Angela Halliday PO Box 10 232 Wellington 6143
Mackenzie District Council	Ms Toni Morrision PO Box 52 Fairlie 7949
Oil Companies Z Energy, Mobil and BP	Mr Mark Laurenson C/- Burton Planning Consultants Limited PO Box 33-817 Takapuna Auckland 0740
Rangitata Diversion Race Management Limited	Mr Gavin Kemble C/- Ryder Consulting Limited PO Box 13009 Tauranga 3141
Royal New Zealand Forest and Bird Protection Society	Ms Jen Miller PO Box 2516 Christchurch 8140
Silver Fern Farms Limited	Mr Daryn Jemmett PO Box 941 Dunedin 9054