

**From:** [Hannah Ritchie](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Thursday, 12 September 2019 2:12:21 PM

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Hi

Please find attached a submission from the New Zealand Pork Industry Board to Plan Change 7 of the Canterbury Land and Water Regional Plan and accompanying Form 5.

Kind Regards

Hannah



## Hannah Ritchie

Senior Environmental Advisor

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New Zealand Pork Industry Board  
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# Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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Submitter ID:

File No:

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 5 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 13 September 2019 to:

Proposed Plan Change 7 to the Land and Water Regional Plan  
Environment Canterbury  
P O Box 345  
Christchurch 8140

Full Name: HANNAH RITCHIE

Phone (Hm): \_\_\_\_\_

Organisation\*: NZ PORK

Phone (Wk): \_\_\_\_\_

\* the organisation that this submission is made on behalf of

Postal Address: PO BOX 20-176

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CHRISTCHURCH

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Email: HANNAH.RITCHIE@PORK.CO.NZ

Fax: \_\_\_\_\_

Contact name and postal address for service of person making submission (if different from above):  
\_\_\_\_\_  
\_\_\_\_\_

## 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
- I could gain an advantage in trade competition through this submission.

**If you have ticked this box please select one of the following:**

- I am directly affected by an effect of the subject matter of the submission
- I am not directly affected by an effect of the subject matter of the submission

Signature: Hannah Ritchie

Date: 12.9.19

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

- I do not wish to be heard in support of my submission; or
- I do wish to be heard in support of my submission; and if so,
- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>		(3) I seek the following decisions from Environment Canterbury:  <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
VARIOUS	VARIOUS	OPPOSE IN PART/ SUPPORT IN PART	SEE ATTACHED DOCUMENT	SEE ATTACHED DOCUMENT

Add further pages as required – please initial any additional pages.

10 September 2019

**Environment Canterbury**

PO Box 345  
Christchurch 8140

**Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan**

**New Zealand Pork Industry Board Submission**

NZPork would like to thank Environment Canterbury for the opportunity to submit on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan. NZPork would like to speak to its submission.

**About NZPork**

The New Zealand Pork Industry Board (NZPork) is a statutory board funded by producer levies. 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. There are around 95 registered commercial producers, comprising a relatively small but significantly integrated sector of the New Zealand agricultural economy. Large commercial operations, such as pork production units, provide a range of economic and social benefits to the region.

There are 55 pig farmers in the Canterbury region, with approximate 10 of these in the Waimakariri Zone and 5 in the Orari Temuka Opihi Pareora zone. These producers have an important flow-on effect to the community, forming an integral part of the rural economy as they utilise other farming resources such as grains for feed production as well as providing employment. Pig farmers in Canterbury use both indoor and outdoor production methods. The different production methods have different options for environmental management and so will have different methods available to them for responding to the proposals put forward in this plan change.

New Zealand pork producers are facing several 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 (now more than 60%), placing further demands on producers who have responded by developing increasingly efficient systems. However, product margins for the industry remain tight and conversations with farmers have indicated that the cost of obtaining consents and remaining compliant is one of the key concerns

## **Nutrient Management**

NZPork supports adoption of water quality limits and the adoption of targets for reductions in nitrogen loss and other methods to ensure that the water quality limits are achieved.

We know that maintaining and improving freshwater quality will require every sector to make changes. Pig farmers in Canterbury have continually proved themselves to be environmental innovators and early adopters of environmental management technologies, such as direct soil injection of effluent and covered effluent ponds. However, pig farmers applying piggery effluent to land in accordance with effluent discharge consents are doing so at volumes far less than those authorised for the dairy industry<sup>1</sup>. While as an industry we are committed to environmental good practice, it is important that the implementation of freshwater policies are fair and reasonable for pig farmers.

In indoor production, pig manure is typically collected and handled in one of two ways. In conventional indoor piggeries, pigs are housed on slatted floors and effluent is collected in under floor pits or channels and regularly flushed to holding tanks or ponds. This may involve a solids separation step where the solids and liquid fractions are handled separately. In deep litter systems, pigs are housed on solid floors with a layer of straw or sawdust covering the floor to absorb manure. The used solid bedding material is removed and replaced on a regular basis (usually when a batch of pigs is removed). This solid material is stockpiled and can be composted and subsequently applied to land or on sold as a soil 'conditioner.'

Pig farmers using conventional indoor production methods have a high degree of control over the application of nutrients to land. Many farmers collect and store effluent in ponds prior to discharging to land during favourable environmental and growing conditions. Some farmers have agreements with neighbouring dairy or arable farms who apply the nutrients to their land at a controlled rate specified in discharge consents or nutrient budgets. Piggery effluent contains valuable plant nutrients and carbon that can improve soil fertility, structure, health and microbial activity. Application of piggery effluent to land reduces the reliance on application of synthetic fertilisers and repurposes a product that would otherwise be deemed

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<sup>1</sup> Standard N loading rate for a piggery effluent discharge consent is 150kg N/ha/yr compared with dairy effluent discharge consents of 50kgN/ha/9 months per yr.

'waste.' When managed well, piggery effluent application to land provides a beneficial and sustainable reuse of nutrients.

NZPork provides guidance to farmers on the correct application of manure to land, including an Environmental Management Guide and Nutrient Management Guide specifically developed for the commercial pig farming industry.

NZPork is concerned that if meeting the targets for reductions in nitrogen loss across catchments results in farmers being unable to apply piggery effluent to land (or only apply at greatly reduced volumes), this will create a significant environmental issue in the generation of large volumes of 'waste' effluent that will require disposal by other means. It may also result in farmers having to make substantial changes to their farming systems (such as switching from a conventional to a deep litter system). NZ Pork seeks that existing users and investment are not compromised in the future through the implementation of nutrient management policies in PC7.

### **Water Allocation**

NZPork supports water allocation limits as part of PC7 where necessary and supported by robust science. In the implementation of policies to cap water allocation at current levels and reduce over-allocation over time, it is essential that there is adequate provision for wash down water for pig farmers, even in times of water shortages.

Adequate water is required for flushing effluent systems and the regular cleaning of sheds. This is linked to animal health, hygiene and the ability to manage potential odour effects from the operations. NZPork seeks that any provisions to cap or reduce water allocation do not impact upon the ability of pig farmers to care for the welfare of their animals or to maintain hygiene standards within the facility.