

8 JANUARY 2018


Dear Robert,

Selwyn District Plan- Baseline Assessment Intensive Livestock Production (RU007)

Thank-you for the opportunity to provide feedback on the draft Baseline Assessment Intensive Livestock Production (RU007) Report (dated 22 November 2017). I really appreciate the time you took to consider our feedback on the current district plan rules relevant to pork production, and consider alternatives.

NZ Pork is generally supportive of the recommendations/options provided in this report. However, we would like to communicate a few points of clarification. Please find the feedback from NZ Pork in the tables that follow.

Kind regards,



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Environmental Advisor
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Section of Report, Page #	Feedback
<p><i>Section 3.0 Review of provisions in the Operative District Selwyn District Plan Page 10</i></p> <p><i>'For piggery activities seeking to expand there is a controlled activity status that was developed through Environment Court mediation with the Pork Industry Board'.</i></p>	<p>Our understanding is that NZ Pork was involved in the NZ Pork appeal decision on the plan in 2004. However, NZ Pork was not involved in the Bates case or mediation with the Environment Court. We have checked this with Barry Loe (Consultant) as there are no current NZ Pork team members in the office from this time.</p>
<p><i>Section 5.0 Extent of consistency across boundaries Page 17</i></p>	<p>Just for your information only the Waimakariri District Council setback distances of 200-750m were developed by the council based on the recommendations from pig farming working group. The farmers are very happy with the outcome. However, this does not necessary represent the views of our farmers in other regions. NZ Pork has commissioned an environmental advisory group (farmers) from all regions of NZ and in February 2018 will work on establishing some agreed buffer distances which we will communicate to Selwyn District Council.</p>
<p><i>Stocking rates for pigs per hectare Various pages</i></p>	<p>Hurunui District Council uses a '15 pigs per hectare' stocking rate for outdoor farms and some other councils use a stocking rate figure too. The preference of NZ Pork is that a council does not specify a specific stocking rate number and instead references the stocking rate is that contained within the latest version of the NZ Pork Good Management Practices: Outdoor Pigs (GMPs). The GMPs are being reviewed and updated this year and will be updated at minimum every two years. NZ Pork now has improved information on the impact of stocking rate (and other on farm management practices) on groundcover. Farmers have been collecting groundcover data for OVERSEER nutrient budget purposes.</p>
<p><i>7.0 Review of Canterbury Regional Council Documents</i> <i>7.1 Canterbury Air Regional Plan October 2017 (CARP)</i> <i>Page 19</i></p> <p><i>'Whereas an intensive farm would primarily consist of an indoor high stock density operation, which depending on management techniques may result in larger odour and dust discharges'.</i></p>	<p>An indoor farm should not have any external dust discharges. There are no activities or surfaces within the buildings that could generate dust and leave via any ventilation systems. There is also limited dust generation from an ecobarn situation which has a deep straw bedding floor.</p> <p>Potential odour generated from an indoor farming operation is generally not from the housing of pigs within the building and potentially occurs during the effluent management stage.</p>

	<p>If the effluent is stored in a tank which is then collected by a tanker and is exported from the farm, then the potential to generate odour from the effluent is very low.</p>
<p><i>11.0 Recommendations/Options Page 32 Paragraph 4</i></p>	<p>NZ Pork is supportive of a requirement to maintain groundcover. Groundcover maintenance an important part of the Industry Agreed Good Management Practices: Outdoor Pigs and we have research projects underway to establish an improved method of our farmers and nutrient budget advisors to calculate ground cover levels as this is an important input to OVERSEER. To calculate a nutrient budget for outdoor pig's a % ground cover figure is required for Spring, Summer, Autumn, Winter for each stock class which are usually located on separate blocks: lactating sows, dry sows-mating, dry sows- gestating, acclimatisation (gilts and boars), growers and finishers.</p>
<p><i>11.0 Recommendations/Options Page 33 11.2.1 Definitions Potential definitions Intensive farming</i></p>	<p>Suggested amendments as follows:</p> <p><i>'means the use of land and/or buildings for commercial plant or animal production where the regular feed source is predominately provided other than from the site concerned, and includes:</i></p> <p><i>(a) the farming of pigs outdoors at a stocking rate <u>that does not exceed the latest version of the Good Management Practices: Outdoor Pigs stocking rates. exceeding 15 pigs per hectare (stocking rate in relation to pig farming means the number of pigs (excluding progeny up to weaner stage) carried per hectare of land, where the area of land fenced, available and used for pig farming includes only that area on which the pigs are regularly run);</u></i></p> <p><i>(b) herd houses, or feed pads, or any building providing shelter to stock where stock are confined within the building for any continuous period exceeding two weeks;</i></p> <p><i>(c) poultry farming;</i></p> <p><i>(d) mushroom farming;</i></p> <p><i>(e) fish farming;</i></p> <p><i>(f) rabbit farming;</i></p> <p><i>(g) the storage and/or disposal of effluent from any of the above, whether on the same site as the intensive farming activity or not. but does not include nurseries, glasshouses, buildings used for housing or sheltering</i></p>

	<i>animals that are giving birth or raising juvenile stock, where no animal is housed or sheltered for more than 3 months in any calendar year and boarding of animals.'</i>
<p>11.0 Recommendations/Options Page 34</p> <p>11.2.1 Definitions Potential definitions Extensive Farming</p>	<p>It is the preference of NZ Pork that the extensive farming definition option that does not include a stock density clause is used.</p> <p><i>Means the keeping, breeding or rearing, of stock on pasture at a stocking density that sustains the maintenance of pasture or ground cover and excludes intensive farming.</i></p>
<p>11.0 Recommendations/Options Page 34</p> <p>11.2.2 Rules Transfer of Powers to the Canterbury Regional Council</p>	<p>NZ Pork is supportive of the 'No Rule(s)' approach whereby the Canterbury Regional Council manages dust and odour discharge.</p>
<p>11.0 Recommendations/Options Page 35</p> <p>11.2.2 Rules Extensive farming- Permitted Activity Rule(s)</p>	<p>NZ Pork is supportive of a permitted activity below for extensive pig farming activities subject to a Certificate of Compliance from Environment Canterbury.</p>
<p>11.0 Recommendations/Options Page 35</p> <p>11.2.2 Rules Expansion of existing intensive farms- Controlled Activity Rule(s)</p>	<p>NZ Pork is supportive of the controlled activity rule for the expansion of existing intensive farms being retained but streamlined and recognition of the compliance with Environmental Canterbury rules included.</p>
<p>11.0 Recommendations/Options Page 35</p> <p>11.2.2 Rules Restricted Discretionary Activity Rule(s)</p>	<p>NZ Pork is supportive of the example potential new rule provided including the materials of discretion listed.</p>
<p>11.0 Recommendations/Options Page 39</p> <p>Options when assessing reverse sensitivity setback buffers</p>	<p>NZ Pork would like to provide SDC with further information on setback buffer distances once the NZ Pork Environmental Advisory Group has convened.</p>
<p>11.0 Recommendations/Options Page 39</p>	<p>NZ Pork would like to reiterate the importance to the industry of being able to provide worker accommodation. NZ Pork is therefore supportive that</p>

<i>Miscellaneous recommendations</i>	residential dwellings be allowed to be erected within any reverse sensitivity buffer as a permitted activity when the dwelling is located on the same property.
<i>11.0 Recommendations/Options Page 40 Summary of Options</i>	Overall, except for any comments made previously in this document NZ Pork is supportive of Option C presented in the report.