

**COMMENTS ON THE proposed NORTHLAND REGIONAL PLAN (published 7 September 2017)**  
**NZ PORK INDUSTRY BOARD**  
**Due 15 November 2017**

| The specific provision of the Proposed Regional Plan that my submission relates to | I support or oppose the above provision | Submission  | I seek the following decision by council  |
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| <b>B DEFINITIONS</b>   |   |   |   |
| Earthworks   | Oppose                                  | The plan should identify that the burying of material infected by unwanted organisms as declared by Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993 is a permitted activity to avoid delay in responding to a biosecurity threat. | <p>Amend the definition of earthworks as follows:</p> <p><i>Earthworks</i></p> <p><i>The mechanical disturbance of the surface of the land by excavation, cutting and filling, blading, ripping, contouring, or placing or replacing earth, but does not include:...</i></p> <p><u>9) The burying of material infected by unwanted organisms as declared by Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993 is a permitted activity to avoid delay in responding to a biosecurity threat.</u></p> |
| Compost  | Oppose                                  | Composting of dead pigs is the preferred method of disposal by the pork industry. This method is  | <p>Amend the provision as outlined</p> <p><i>Compost</i></p>  |

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|                 |                         | supported by the NZ Pork Environmental Management Guidelines.   | <p>Any combination of solid or semi-solid vegetable and animal waste that has fully decomposed and matured to a stabilised product. For the purposes of this plan, compost does not contain human sewage, <del>dead animals or animal parts.</del></p> <p>Or in the alternative C.6.3.3 should be amended to include this method of disposal and associated discharge.</p>   |
| Farm wastewater | Support with amendments | <p>Support proposed definition for farm wastewater that includes all wastewater from a piggery.</p> <p>The definition should be clear that it relates to indoor pig farming activities and not outdoor.</p> | <p>Accept the provision with amendments as outlined</p> <p><i>All wastewater from a farm dairy, dairy yard, feed pad, standoff area, stock yard, sale yard, wintering barn, loafing pad, calf rearing barn, piggery (<u>excludes outdoor pig farming</u>), poultry farm, or any other stock yard, adjacent entrance and exit races, farm transit races when used for standoff, stock underpass or similar. Farm wastewater includes animal effluent, washdown water, pit washings, sediment and other solid matter, milk, milk residue, supplementary feed, molasses, detergents, sterilising agents and other residues associated with routine farming practices.</i></p> |

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| <b>C. RULES</b>   |   |  |  |
| <b>C.5 TAKING AND USING WATER</b>   |   |  |  |
| <b>C.5.1 Taking and use of freshwater</b>   |   |  |  |
| <p>Note:<br/>Section 14(3)(b) of the Resource Management Act 1991 allows fresh water to be taken or used for a person's reasonable domestic needs or the reasonable needs of a person's animals for drinking water without a resource consent, provided the taking or use does not, or is not likely to, have an adverse effect on the environment.</p> | Support                                 | Support the reference to s14(3)(b) and consent not being required for fresh water to be taken or used for a person's reasonable domestic needs or the reasonable needs of a person's animals for drinking water. | Accept the provision                     |
| C5.1.1<br>Minor takes – permitted activity  | Support                                 | A minor take subject to relevant limits is supported and provides certainty for water users.   | Accept the provision                     |
| C.5.1.8 Supplementary allocation - restricted discretionary activity  | Support                                 | A restricted discretionary activity for larger takes subject to relevant limits is supported   | Accept the provision                     |
| C.5.1.10 Other water takes – discretionary activity   | Support                                 | The discretionary activity status for other takes is supported subject to an assessment that this is an efficient use and allocation.  | Accept the provision                     |
| <b>C.6 DISCHARGES TO LAND AND WATER</b>   |   |  |  |
| <b>C.6.3 Agricultural waste discharges</b>  |   |  |  |
| C.6.3.1 Farm wastewater discharges to land- permitted activity  | Support                                 | Support a clear permitted activity standard for farm wastewater discharges to land.  | Accept the provision                     |

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| C6.3.3 Discharges associated with the disposal of dead animals or offal-permitted activity. | Support with amendments | Composting of dead pigs is the preferred method of disposal by the pork industry. This method is supported by the NZ Pork Environmental Management Guidelines.<br><br>As the definition of Compost excludes dead animals or animal parts, C.6.3.3 should be amended to include this method of disposal and associated discharge. | Accept the provision with amendments as outlined.<br><br><i>The discharge of contaminants onto or into land in association with the disposal of dead animals (including composting) or offal is a permitted activity, provided:...</i> |
| C.6.3.5 Agricultural waste discharges-discretionary activity                                | Support                 | The discretionary activity status for agricultural waste discharges that are not permitted activities is supported.  | Accept the provision   |
| <b>C.6.4 Stormwater discharges</b>  |                         |  |  |
| C6.4.2<br><u>Other Stormwater discharges – permitted activity</u>                           | Support                 | The permitted activity status for the diversion and discharge of stormwater into water, or onto or into land is supported. Plans that provide a maximum site coverage or impervious surface area in rural environments are blunt tools that do not reflect the activities or their actual or potential effects.                  | Accept the provision   |
| <b>C.6.7 Solid waste</b>  |                         |  |  |
| C.6.7.3 On site refuse disposal – permitted activity  | Oppose                  | On site disposal of waste from primary production that excludes offal and dead stock is supported subject to amendments to C.6.3.3 to provide for the composting and disposal of dead pigs within a site.  | Reject the provision   |

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| C.6.7.4<br>Composting operations less than 10m3 – permitted activity                     | Oppose  | We seek a provision in the plan to address animal carcass composting, which is the preferred disposal method for dead pigs.  | Reject the provision |
| C.6.7.5<br>Composting operations greater than 10m3 – permitted activity                  | Oppose  | We seek a provision in the plan to address animal carcass composting, which is the preferred disposal method for dead pigs.  | Reject the provision |
| <b>C.6.9 Other discharges of contaminants</b>  |         |  |                      |
| C.6.9.6<br>Other discharges – discretionary activity                                     | Support | Support the discretionary activity status for the discharge of a contaminant into water or onto or into land unless otherwise controlled in the plan on the understanding this controls point source and not diffuse discharges.<br><br>Note concerns with the plans approach whereby policies D.4.1 – D.4.4 set water quality standards applicable for resource consent processes but the activity status for diffuse charges is not clear. | Accept the provision |
| <b>C.7 DISCHARGES TO AIR</b>   |         |  |                      |
| <b>C.7.1 Burning</b>   |         |  |                      |
| C.7.1.1<br>Outdoor burning – permitted activity  | Support | Support the provision providing for the burning of animal carcasses and offal on production land as a permitted activity.  | Accept the provision |
| C.7.1.4<br>Outdoor burning for biosecurity purposes – permitted activity                 | Support | Support clear provision in the plan that do not duplicate or conflict with the Biosecurity Act.  | Accept the provision |
| C.7.2.6<br>Discharges to air not specifically regulated in the plan – permitted activity | Support | The permitted activity approach recognises and supports rural production activities – subject to discharges not being offensive,   | Accept the provision |

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|  |         | objectionable, noxious, dangerous beyond a boundary.  |   |
| <b>C.8 LAND USE AND DISTURBANCE ACTIVITIES</b>                     |         |   |   |
| <b>C.8.3 Earthworks</b>  |         |   |   |
| C.8.3.1<br>Earthworks – permitted activity                         | Oppose  | The plan should identify that the burying of material infected by unwanted organisms as declared by Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993 is a permitted activity to avoid delay in responding to a biosecurity threat. | Amend the definition of earthworks as follows:<br><br><u>9) The burying of material infected by unwanted organisms as declared by Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993 is a permitted activity to avoid delay in responding to a biosecurity threat.</u> |
| <b>C.8.5 Bores</b>   |         |   |   |
| C.8.5.3 Construction or alteration of a bore – controlled activity | Support | The controlled activity status for the construction and alteration of a bore – controlled activity is supported as this provides certainty for applicants and investment.   | Accept the provision  |

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| <b>D POLICIES</b>  |   |   |  |
| <b>D.2 General</b>   |   |   |  |
| D.2.1<br>Rules for managing natural and physical resources   | Support                                 | The parameters identified around which rules are to be included is supported.   | Accept the provision                     |
| D.2.2<br>Social, cultural and economic benefits of activities  | Support                                 | Policy D.2.2 and the need to consider social, cultural and economic benefits in considering resource consents is supported.   | Accept the provision                     |
| D.2.3<br>Application of policies in the Regional Policy Statement for Northland to non-complying activities. | Oppose                                  | <p>Policy D.2.3 points to a selection of RPS policies that it considers are relevant only in respect of considering non-complying activities. The submitter is concerned that this may result in a fettered, assessment not just for non-complying activities but for all activities.</p> <p>Notably D.2.3 does not point to any relevant RPS objectives. There are important RPS objectives e.g. 3.5 Enabling economic wellbeing and 3.6 Economic activities – reverse sensitivity and sterilization equally important in considering activities requiring consent under this plan.</p> <p>It is important that the plan provides a clear and solid framework that recognises that rural production activities have a functional</p> | Reject the provision                     |

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|  |                 | need for a rural location and access to the resources within this environment. This is particularly important where activities may compete for the same resources.   |  |
| D.2.4<br>Resource consent duration                       | Support         | Support policy that requires resource consent expiry dates to have regard to the security of tenure for investment. This is particularly important for indoor farming activities that rely on significant physical infrastructure. | Accept the provision   |
| <b>D.3 Air</b>   |                 |  |  |
| D.3.1<br>General approach to managing air quality        | Support         | Support clear policy to assess discharges to air in particular the consideration of the rural production environment as an environment within which discharges to air from a range of sources is typical.                          | Accept the provision   |
| D.3.3<br>Dust and odour generating activities            | Support         | Support clear policy to assess discharges to air in particular the consideration of the rural production environment as an environment within which discharges to air from a range of sources is typical.                          | Accept the provision   |
| <b>D.4 Land and Water</b>                                |                 |  |  |
| D.4.13<br>Achieving freshwater quantity related outcomes | Support in part | There are no supportive policies that recognise the value of water for rural production.   | Amend the provision to identify a freshwater quality related outcome related to the provision of reliable access to water for rural production activities. |
| D.4.21   | Support         | The policy requirement for a water management plan to support applications   | Accept the provision   |



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| Reasonable and efficient use of water - group or community water supplies |         | for group or community water supplies is supported.  |                      |
| D.4.22<br>Reasonable and efficient use of water - other uses              | Support | The policy requirement for a water management plan to include an assessment of reasonable and efficient use is supported is supported. | Accept the provision |