

This is a further submission to the Environmental Protection Authority where the matter relates to request for change to plan where Minister has made a direction under section 142(2) of the Resource Management Act 1991.

The plan change is the Omnibus Plan Change – Plan Change 8 to the Water for Otago: Regional Plan.

Part A: Further submitter details

Name of organisation: <i>(if relevant)</i>	New Zealand Pork Industry Board (NZPork)		
Title:	<input type="checkbox"/> Mr x Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr <input type="checkbox"/> Other: (Please tick the appropriate title)		
First name of further submitter:	Hannah	Surname of further submitter:	Ritchie
First name of contact person: <i>(if different to above)</i>		Surname of contact person: <i>(if different to above)</i>	
Home Ph:		Work Ph:	027 201 6261
Mobile:	027 201 6261		
Email address for service:	Hannah.ritchie@pork.co.nz		
Postal Address: <i>(or alternative address for service)</i>	PO Box 20176 Bishopdale, Christchurch	Postcode:	8543

Part B: Interest

Only persons that come under the following categories may make further submissions.

<p>I am a person representing a relevant aspect of the public interest.</p> <p>The grounds for saying why I come within this category are explained below. <input type="checkbox"/></p>	<p>I am a person who has an interest in the Omnibus Plan Change (PC8) that is greater than the interest the general public has.</p> <p>The grounds for saying why I come within this category are explained below. <input checked="" type="checkbox"/></p>	<p>I am the local authority <input type="checkbox"/></p>
<p>Please specify the grounds for saying why you come within the category above:</p>		
<p>NZPork is the industry good body representing all commercial pig farmers within the Otago region.</p>		

Part C: Do you wish to be heard in support of your further submission?

<p>I do not wish to be heard in support of my further submission <input type="checkbox"/></p>	<p>I wish to be heard in support of my further submission. <input checked="" type="checkbox"/></p> <p>If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input checked="" type="checkbox"/></p>
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Part D: Further submission points

If you require additional space for any question(s) please attach further documents or paper to this further submission form and clearly state your name and the question(s) you are expanding on.

Name of original submitter	Particular parts of the submission you support/oppose <i>Please indicate whole submission or submitter point ID (e.g. 80005.3)</i>	Are you in support of or in opposition to the particular whole/part of the submission?	What are your reasons for your support or opposition?	Do you seek for the whole/part of the submission to be allowed or disallowed (select one)?
<i>Maori Point Vineyard (Marilyn)</i>	80023.07	Oppose	Submitter requests inclusion of controls to be exercised in the event of odour discharges. Odour management is not an issue or objective of the Otago Water Plan. Odour discharges from farm waste management (which includes effluent) are managed under rule 16.3.7.2 of the Otago Air Plan. Several district plans within the region also have provisions to control odour discharges from effluent application.	Disallow
Otago Regional Council	80042.07 80042.08 80042.09 80042.10	Oppose in part	NZPork agrees that the words “(including storage pond(s) and ancillary structures)” is unnecessary and supports their removal from rules 14.7.1.1, 14.7.1.2, 14.7.2.1 and 14.7.2.1. However, the proposed revision to the above rules does not address the	Disallow

			<i>deficiencies in the rules in that they account for ALL types of animal waste systems, while having controls and conditions applicable only to dairy effluent ponds. NZPork seeks that the rules be more comprehensively reworded, or definitions changes, so that the rules apply only to effluent ponds, which will align with the issues identified in the S32 report.</i>	
<i>Otago Regional Council</i>	<i>80042.17</i>	<i>Support</i>	<i>Support the deletion of stock exclusion rule 13.5.1.8A(b) to avoid duplication or confliction with the Resource Management (Stock Exclusion) Regulations 2020.</i>	<i>Allow</i>
<i>Director General of Conservation</i>	<i>80055.23</i>	<i>Oppose</i>	<i>The submitter seeks a ten metre setback under stock exclusion rule 13.5.1.8A. Such a setback is unnecessary in all situations to meet desired environmental outcomes, and is greater than the setback distances required under the Resource Management (Stock Exclusion) Regulations.</i>	<i>Disallow</i>
<i>DairyNZ Limited</i>	<i>80088.01</i>	<i>Support</i>	<i>Support the use of the term effluent pond in the rules in section 14.7 to provide clarification as to the intent of the rules. This align with NZPork's original submission on this topic. The wording of</i>	<i>Allow</i>

			<i>this rule as notified captures ALL animal waste systems used in the pork industry, however the S32 report identifies only effluent ponds as having a detrimental effect on water quality in parts of the region.</i>	
<i>DairyNZ Limited</i>	<i>80088.03 and 80088.06</i>	<i>Support</i>	<i>Support the use of soil risk framework as the basis of determining effluent application rate, rather than requiring 'low' application rate in all instances. The environmental effects of effluent application will vary dependent on the physical and biochemical characteristics of the soil. Some piggeries on smaller land holdings may have limited areas on which to apply effluent. Mandatory low application rates would require either increased application area, or increased application frequency – which may not be feasible, or necessary, in all situations to meet desired environmental outcomes.</i>	<i>Allow</i>
<i>DairyNZ Limited</i>	<i>80088.05</i>	<i>Support</i>	<i>Support the deletion of the requirement to not spread effluent beyond the property boundary in rule 12.C.1.4. This aligns with NZPorks original submission. Piggery</i>	<i>Allow</i>

			<p><i>effluent is often supplied to neighbouring farms, which could be prevented if this rule is implemented as notified. Commercial piggeries would have to find alternate means of disposing of effluent, which could create logistical difficulties and severe economic consequences for piggery operation. Effluent spread outside of the originating property, with the owners permission, poses no more of an environmental risk than spreading on the originating property, providing the same controls are implemented.</i></p>	
<i>DairyNZ Limited</i>	<i>8008810</i>	<i>Support</i>	<p><i>Support the use of industry based templates and guidance for the use of animal effluent management plans as part of rule 14.7.2.1. NZPork has an effluent management template specifically designed for use by commercial pig farmers which can be made available to the Council.</i></p>	<i>Allow</i>
<i>Federated Farmers of New Zealand – Otago and North Otago Provinces</i>	<i>80090.01 & 8009.02</i>	<i>Support</i>	<p><i>Support submission that the Section 32 report is not adequate in terms of alternative options available and consultation has been inadequate. No consultation was undertaken with the pork</i></p>	<i>Allow</i>

			<p><i>sector prior to notification of PC8, despite all commercial piggeries in the region being affected by the animal waste management policies and rules in the plan change. This lack of consultation, and understanding of commercial piggeries, has led to a rule framework based entirely on the dairy sector which is largely unworkable for pig farmers in its current format.</i></p>	
<p>Federated Farmers of New Zealand – Otago and North Otago Provinces</p>	<p>80090.09, 80090.15, 80090.19 and 80090.28</p>	<p>Support in part</p>	<p><i>The submitter seeks a revision to reword the policy and rules to focus on dairy effluent rather than all animal waste systems. This change would reflect the scope of the S32 report. However, NZPork acknowledges that piggery effluent is similar in composition and application methods to dairy effluent, and some piggeries make use of similar pond systems to store effluent. NZPork promotes good management practices for the storage and application of piggery effluent and would support a policy and rule framework that encouraged pig farmers to adopt good practices and bring controls into line with those in other regions.</i></p>	<p>Allow</p>

			<p><i>Many pig farmers also export effluent to neighbouring farms, including dairy farms. By only including dairy effluent in the policy and subsequent rules, this could give rise to complications when determining application rates when both regulated (dairy) and unregulated (piggery) effluent are applied. This could result in dairy farmers being unwilling or unable to accept piggery effluent onto their properties. NZPork seeks a rewording to focus on effluent and effluent ponds, rather than dairy effluent.</i></p>	
<p><i>Federated Farmers of New Zealand – Otago and North Otago Provinces</i></p>	<p><i>80090.14</i></p>	<p><i>Support</i></p>	<p><i>Support effluent application depth and rate based on soil risk framework under rule 12.C.2.5(b)(i). The environmental effects of effluent application will vary dependent on the physical and biochemical characteristics of the soil. Some piggeries on smaller land holdings may have limited areas on which to apply effluent. Mandatory low application rates would require either increased application area, or increased application frequency – which may not be feasible, or</i></p>	<p><i>Allow</i></p>

			<i>necessary, in all situations to meet desired environmental outcomes.</i>	
<i>Otago South River Care</i>	<i>80100.01</i>	<i>Support</i>	<i>The submitter seeks criteria be included in the rules in Section 12.C for effluent applied or transported between farms via slurry tanker. This is a common effluent application method on commercial pig farms. NZPork seeks that Otago RC work with the pork industry to determine appropriate and workable standards for effluent application and transportation via slurry tanker.</i>	<i>Allow</i>
<i>Landpro Limited</i>	<i>80093.05</i>	<i>Support in part</i>	<i>Submitter seeks wording changes to policy 7.D.7(d) to ensure low rate effluent application where possible, rather than require in all circumstances. NZPork supports this on the grounds that low-rate effluent application may not always be necessary or feasible.</i>	<i>Allow</i>
<i>Landpro Limited</i>	<i>80093.27</i>	<i>Support</i>	<i>Submitter seeks amendment to definition of Animal Waste System to provide clarity on what is/isn't considered to fall under the definition. NZPork supports the need to amend</i>	<i>Allow</i>

			<i>the definition of Animal Waste System on the grounds that the definitions of the plan change are not fit for purpose for all activities</i>	
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Part E: Signature

Signature of person making further submission or person authorised to sign on behalf of person making further submission. Please note a signature is not required for electronic submissions.

Signature: _____ **Date:** _____