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FONTERRA LIMITED

SUBMISSIONS ON PROPOSED CHANGE 13 (AIR QUALITY) TO THE BAY OF PLENTY REGIONAL NATURAL RESOURCES PLAN

To: Submission on the Proposed Change 13
Bay of Plenty Regional Council
PO Box 364
EDGE CUMBE 3158

Via email: air@boprc.govt.nz

SUBMITTER: FONTERRA LIMITED

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I confirm that I am authorised on behalf of Fonterra Limited to make this submission.

Fonterra wishes to be heard in support of this submission. If others are making a similar submission, Fonterra will consider presenting a joint case with them at the hearing.

Fonterra could not gain an advantage in trade competition through this submission.

1. OVERVIEW OF COMMENTS

- 1.1. Fonterra Limited (“Fonterra”) welcomes the opportunity to submit on Proposed Plan Change 13 (Air Quality) (“PC13”) to the Bay of Plenty Regional Natural Resources Plan (“Plan”).
- 1.2. Fonterra owns and operates the Edgecumbe Dairy Manufacturing Site (the “Edgecumbe Site”) which is located in the Whakatane District. The operation of the Edgecumbe Site is reliant on the provisions in the Plan, including those proposed in PC 13, being appropriate and not unduly restrictive, particularly in respect of the management of odour. It is in this context that Fonterra is affected by PC13.
- 1.3. This submission contains the following sections:
 - **Section 2:** Fonterra’s operations in the Bay of Plenty.
 - **Section 3:** The statutory requirements for PC13 to provide for the Edgecumbe Site.
 - **Section 4:** Fonterra’s general submission on PC13.
 - **Section 5** An overall conclusion
 - **Attachment A:** Fonterra’s specific submission points on PC13.

2. FONTERRA IN THE BAY OF PLENTY

- 2.1. Fonterra is New Zealand’s largest dairy co-operative, and it the world’s leading exporter of dairy products, trading in over 100 countries. It is responsible for more than a third of international dairy trade and comprises more than 25 percent of New Zealand’s export earnings.
- 2.2. As a co-operative, Fonterra is owned by more than 10,600 shareholder farmers. Fonterra’s 17,300 staff work across the dairy spectrum from advising farmers on sustainable farming and milk production, to ensuring that Fonterra meets exacting quality standards and delivers dairy nutrition every day in more than 100 markets around the world.
- 2.3. Fonterra collects more than 16 billion litres of milk from New Zealand, exporting more than 2.4 million tonnes of dairy product annually. Globally, Fonterra processes more than 22 billion litres of milk and owns leading dairy brands in Australasia, Asia, the Middle East and Latin America.

THE EDGECUMBE SITE

- 2.4. The Edgecumbe Site was established in 1923 and is situated adjacent to the Rangitāiki River in the Eastern Bay of Plenty. The plant currently employs approximately 320 staff.
- 2.5. The site has a fleet of over 25 tankers which collects up to 4.2 million litres of milk (peak) from Fonterra farmer shareholders every day during the milk production season. The Edgecumbe Site processes approximately 650 million litres of milk annually, producing cream, protein, whey products, ethanol and lipids.
- 2.6. There are significant positive effects for the social and economic wellbeing of the Whakatane District and wider Bay of Plenty Region that flow from the continued successful operation of Fonterra’s

manufacturing site at Edgecumbe, with direct positive social and economic effects for its employees, contractors, service providers and farmer suppliers.

- 2.7. As part of its operations, the Edgecumbe Site discharges combustion related contaminants to air and wastewater generated from the manufacturing process onto farmland across the Rangitāiki Plains. Wastewater from the plant is separated into three streams before it is discharged, based on its lactose content (low, medium and high strength). The land-based irrigation and spreading of wastewater can result in an odour discharge.

STATUTORY RECOGNITION OF THE EDGECUMBE SITE

- 2.8. In accordance with the requirements of the Resource Management Act 1991 (“RMA”) and higher order planning documents, the Plan must manage the effects of air discharges including odours, control reverse sensitivity issues and provide for economic and social wellbeing. Of particular relevance, PC13 must:

- Be prepared in accordance with the purpose and principles set out in Part 2 of the RMA; and
- Give effect to the Bay of Plenty Regional Policy Statement (“RPS”).

- 2.9. There are two general elements of sustainable management relevant to the Edgecumbe Site in the context of section 5 of the RMA that the Plan must address:

- Enabling people and communities to provide for their social, economic and cultural wellbeing; and
- Protecting the quality of the environment.

- 2.10. In light of this the Plan and PC13 must recognise and provide for the regionally significant Edgecumbe Site.

THE BAY OF PLENTY REGIONAL POLICY STATEMENT

- 2.11. The RPS includes several provisions of particular relevance to air discharges and the management of odours:

- Avoiding, remedying and mitigating the effects of odours (Objective 1);
- Discouraging reverse sensitivity associated with odours (Policy AQ 1 A), which provides:

Actively discourage:

(a) Locating new sensitive activities near activities that discharge offensive and objectionable odours, chemical emissions or particulates; ...

- Managing the effects from the discharge of odours (Policy AQ 2A).

- 2.12. Fonterra submits that the provisions of PC13 have not sufficiently given effect to the RPS, particularly the clear policy direction in Policy AQ 1A "Discouraging reverse sensitivity associated with odours, chemicals and particulates".

- 2.13. Giving effect to the RPS does not require repeating the above provisions in the Plan. However, the Plan does need to implement the clear directions contained in the relevant RPS provisions.

3. GENERAL SUBMISSION

IRRIGATION AND SPREADING OF DAIRY MANUFACTURING WASTEWATER

- 3.1. Fonterra holds resource consents that authorise the discharge of dairy liquids to land from the Edgecumbe Site and its associated silo compound areas onto farms within the Whakatane District. Fonterra also holds a resource consent for the discharge of medium and high strength wastewater to land via irrigation. These consents include buffer requirements that ensure that there are separation distances from the wastewater disposal areas and more sensitive land uses.
- 3.2. Rule AQ R3 of the Operative Bay of Plenty Air Plan provides for the discharge of liquid waste via spray irrigation that generates odour as a permitted activity, so long as performance standards are met. Proposed rule AQ R3 of PC13 has been widened to include soil injection and land soakage, in addition to spray irrigation, which Fonterra supports.
- 3.3. Proposed rule AQ R3 requires that for these activities to be permitted, the discharge must not be noxious or dangerous, offensive or objectionable beyond the boundary of the subject property or into any water body. On face value, this seems more permissive than the existing provision for the land disposal of wastewater generated at the Edgecumbe Site. However, to be classified as liquid waste under the definition of PC13, the solids content must be less than 20% and cannot be a hazardous substance. Milk is classified as hazardous substance due to its potential for ecotoxic effects if not managed appropriately. Dairy wastewater is also classified as a hazardous substance. The current permitted activity rule therefore does not apply to the land-based disposal of milk, dairy factory wastewater, dairy liquids and/or other dairy factory by-products.
- 3.4. Fonterra therefore seeks an amendment to Rule AQ R3 and/or amendment to the definition of 'liquid waste' to specifically permit the air discharges associated with the irrigation, truck spreading, soil injection or land soakage of milk, dairy factory wastewater, dairy liquids and/or other dairy factory by-products. Fonterra's proposed amendments are discussed further in **Attachment A**.
- 3.5. Fonterra also seeks the deletion of reference to 'noxious or dangerous' from Rule AQ R3 and/or the deletion of the definition of 'noxious or dangerous' in its entirety, as the definition is so broad that Fonterra considers that a significant proportion of the contaminants that are discharged to air would be captured under this definition, which is not appropriate and places an unwarranted level of regulation on activities such as spray irrigation.

ECONOMIC WELLBEING AND REGIONALLY SIGNIFICANT INDUSTRY

- 3.6. There is not sufficient recognition as part of PC13 of economic wellbeing, which is a fundamental pillar of sustainable management. Industrial activities, such as the Edgecumbe Site, provide for both economic and social wellbeing.
- 3.7. Fonterra seeks two new objectives for PC13 that provide for air discharges so long as the effects are appropriately avoided, remedied and mitigated. Fonterra also seeks an amendment to Policy AQ P4 to require consideration of the social and economic benefits of activities that result in air discharge.
- 3.8. The Edgecumbe Site is regionally significant and has significant economic benefits for the Whakatane District and the wider Bay of Plenty. Fonterra considers that the Plan and PC13 should recognise this.

4. SPECIFIC SUBMISSION POINTS

- 4.1. Fonterra's specific submission points are provided in **Attachment A**.
- 4.2. In respect of all of those submission points in **Attachment A**, Fonterra seeks:
- Where specific wording has been proposed, words or provisions to similar effect;
 - All necessary and consequential amendments, including any amendments to the provisions themselves or to other provisions linked to those provisions submitted on including any cross references in other chapters; and
 - All further relief that is considered necessary to give effect to the concerns described above and in **Attachment A** to follow, and any changes required to give effect to the Bay of Plenty Regional Policy Statement.

5. OVERALL CONCLUSION

- 5.1. In relation to the provisions that Fonterra has raised concerns about, those provisions require amendment because without amendment, those provisions:
- will not promote sustainable management of resources, will not achieve the purpose of the RMA;
 - are contrary to Part 2 and other provisions of the RMA;
 - will not enable the social and economic well-being of the community;
 - will not meet the reasonably foreseeable needs of future generations;
 - will not achieve integrated management of the effects of use, development or protection of land and associated resources of the Bay of Plenty Region.
 - will not enable the efficient use and development of Fonterra's assets and operations, and of those resources; and
 - do not represent the most appropriate way to achieve the objectives of the Plan, in terms of section 32 of the RMA.

Dated: 18 April 2018

Fonterra Limited by their duly authorised agents

Mitchell Daysh Limited



Mark Chrisp, Director

ATTACHMENT A: FONTERRA LIMITED'S SUBMISSIONS ON THE PROPOSED CHANGE 13 (AIR QUALITY) TO THE BAY OF PLENTY NATURAL RESOURCES PLAN

| REF | PLAN CHANGE PROVISION | PAGE | SUPPORT/ OPPOSE | FONTERRA'S SUBMISSION | RELIEF SOUGHT (OR WORDING TO SIMILAR EFFECTS) NOTE: New text shown as <u>underlined</u> , and deleted text shown as strike-through |
|-----|--|------|----------------------------------|--|--|
| 1 | Objective AQ O1-O3 | 1 | Support in part | Fonterra generally supports the intent of objectives AQ O1 to O3. However, Fonterra seeks that two additional objectives be included in PC13 that enable air discharges (provided effects are avoided, remedied and / or mitigated appropriately) – shown below. | Retain Objectives AQ O1, AQ O2 and AQ O3 and insert two new objectives to enable air discharges as outlined in Submission Point 2 . |
| 2 | New Objectives AQ O4 and AQ O5 | N/A | Oppose the absence of objectives | Fonterra seeks that two new objectives be inserted to enable air discharges (provided effects are managed). Objectives of this nature recognise that there are significant positive economic and social effects from activities that are often reliant on the ability to discharge contaminants to air (such as the Edgcumbe Site). These positive effects should be considered alongside the management of adverse effects. | Insert two New Objectives AQ O4 and AQ O5 as follows: <u>AQ O4 The operational requirements of light and heavy industry, other location-specific industry, infrastructure, rural activities and mineral extraction activities are recognised and provided for.</u> |
| 3 | Policy AQ P1 Classification of activities — Te wehewehenga o ngā mahinga | 1 | Support | Fonterra supports Policy AQ P1 insofar as it requires air discharges from activities where effects can be appropriately managed to be permitted. Fonterra considers that the effects associated with its disposal of wastewater via spray irrigation and land spreading can be managed in this manner. | <u>AQ O5 Provide for activities discharging to air where significant adverse environmental effects can be avoided, and other effects can be appropriately remedied or mitigated.</u> |
| 4 | Policy AQ P2 | 1 | Oppose | Fonterra seeks amendments to this policy as the use of 'avoid' would effectively operate as a prohibition of the | Retain Policy AQ P1 as notified. Amend Policy AQ P2 as follows: |

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| | Hazardous substances – Ngā matū mōrearea | | | <p>discharge of hazardous substances, following decisions on the interpretation of "avoid" such as <i>King Salmon</i>. Milk and dairy wastewater are both classified as being hazardous substances, and the discharge of dairy wastewater and by-products to air (via irrigation) is an environmentally appropriate way to dispose of it.</p> <p>The focus of this policy should be on environmental effects rather than the management of the activity. It should be on avoiding significant adverse environment effects associated with the discharge of hazardous substances where practicable and, where that is not practicable, provide for remediation and mitigation as appropriate effects management mechanisms.</p> | <p>NOTE: New text shown as <u>underlined</u>, and deleted text shown as strike-through</p> <p>Hazardous substances — Ngā matū mōrearea Avoid significant adverse environmental effects associated with the discharges of hazardous substances to air and where avoidance is not practicable, possible, remedy or mitigate the discharge-effects using the best practicable option.</p> |
| 5 | Policy AQ P3 Management of Discharges – Te whakahaere i ngā tukunga | 2 | Support in part | <p>Fonterra considers that it is significant effects that should be avoided – not all effects (given the implications of the use of 'avoid policies' post <i>King Salmon</i>). Therefore, Fonterra seeks amendments to this policy to ensure it is significant adverse effects being avoided, not all adverse effects (where remediation and mitigation are appropriate effects management mechanisms).</p> <p>The Edgecumbe Site is regionally significant, given the significant economic benefits to the Whakatane District and the wider Bay of Plenty. This should be recognised in the plan.</p> <p>Fonterra seeks the inclusion of a definition of 'Regionally Significant Industry' and amendments to relevant policies to reference 'Regionally Significant Industry' in the same manner as Regionally Significant Infrastructure is recognised.</p> | <p>Amend Policy AQ P3 as follows:</p> <p>Management of discharges — Te whakahaere i ngā tukunga</p> <p>(a) Activities that discharge contaminants to air must be managed, including by use of the best practicable option, to:</p> <p>(b) safeguard the life supporting capacity of the air, avoid significant adverse effects on human health, and manage adverse effects on cultural values, amenity values, and the environment</p> <p>(c) avoid the discharge of contaminants at a rate or volume that may contribute to, or cause an exceedance or breach of the ambient air quality standards of the NESAQ or exceed the health-based values of the AAQGs</p> <p>(d) avoid reduction in visibility where it may cause adverse effects on vehicle, aircraft, or ship safety</p> |

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| | | | | | <p>NOTE: New text shown as <u>underlined</u>, and deleted text shown as strike through</p> |
| | | | | <p>The Waikato Regional Policy Statement includes a management regime for both Regionally Significant Industry and Regionally Significant Infrastructure that recognises their contributions to social and economic wellbeing. Fonterra considers that it would be appropriate to do the same of the Bay of Plenty Region.</p> | <p>(e) avoid the discharge of contaminants that may cause adverse effects on regionally significant infrastructure and regionally significant industry</p> <p>(f) minimise the discharge of contaminants into areas beyond the boundary of the subject property where it may cause adverse effects on human health, cultural values, amenity values, or the environment.</p> |
| 6 | <p>Policy AQ P4 Matters to consider – Ngā take hei whiriwhiri</p> | 2 | Support in part | <p>PC13 should recognise the Edgecumbe Sites role and status as being of regional significance.</p> <p>Fonterra seeks a definition of 'Regionally Significant Industry' and amendments to relevant policies to reference 'Regionally Significant Industry' in the same manner as Regionally Significant Infrastructure is recognised.</p> <p>Fonterra seeks an additional matter (h) to consider of the utilisation of the best practicable option, and that the practices employed as the best practicable option should be appropriate to the effects of the discharge.</p> <p>Fonterra also seeks an additional matter (i) to this policy that recognises that discharges associated with industrial activities do result in substantial positive economic and social effects, which should be recognised by a decision maker when considering any resource consent application.</p> <p>Similarly, there should be consideration of the investment of an existing industry or consent holder into infrastructure that mitigates the adverse effects of air discharges as part of the decision-making process as new matter (j).</p> | <p>Amend Policy AQ P4 as follows:</p> <p>Matters to consider — Ngā take hei whiriwhiri</p> <p>When considering the acceptability of any discharge of contaminants to air, regional-plan-users decision makers must have particular regard to the following matters:</p> <p>(a) The proximity of sensitive activities to the discharge.</p> <p>(b) The location of any Gazetted airsheds, or areas where the discharge may cause an exceedance or breach of the ambient air quality standards of the NESAQ or exceed the health-based values of the AAQGs.</p> <p>(c) Adverse effects on air quality values identified in the relevant iwi and hapū resource management plans.</p> <p>(d) The effect of the prevailing weather conditions, including rainfall, wind speed and wind direction.</p> <p>(e) The effect of the discharge on human health, cultural values, amenity values, the environment, and regionally significant infrastructure and regionally significant industry.</p> <p>(f) Cumulative effects.</p> |

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| | | | | <p>Fonterra also seeks an additional matter (k) requiring that the FIDOL factors should be considered when making an assessment of dust and odour.</p> | <p>NOTE: New text shown as <u>underlined</u>, and deleted text shown as strike-through</p> <p>(g) The effect of new activities discharging contaminants into air near established sensitive activities.</p> <p>(h) The utilisation of the best practicable option for emission control and management practices that are appropriate to the scale of the discharge and potential adverse effects</p> <p>(i) The extent to which the air discharge and associated activities may provide for economic or social wellbeing.</p> <p>(j) The value of investment in existing infrastructure to mitigate adverse effects associated with the discharge of contaminants to air.</p> <p>(k) The FIDOL factors (frequency, intensity, duration, offensiveness and location) for determining the adverse effects in relation to dust and odour.</p> |
| 7 | New Policy AQ P11 | N/A | Oppose the absence of a policy | <p>Reverse sensitivity issues are increasingly becoming an issue for large scale industrial activities (and other activities including those which involve discharges to air). Fonterra seeks a policy which specifically directs that land uses sensitive to the effects of existing discharges to air avoid locating in proximity to those activities.</p> <p>The proposed policy "seeks to avoid ..." on the basis that when BOPRC is submitting on land use proposals or district plan reviews is can advocate appropriate outcomes with policy support.</p> | <p>Insert a new Policy AQ P11 as follows:</p> <p><u>Seek to avoid the establishment or expansion of land uses which are sensitive to the effects of existing activities involving the discharge of contaminants to air.</u></p> |
| 8 | Rule AQ R1 General activities – Permitted — Ngā | 4 | Support | <p>Fonterra supports the permitted activity rule.</p> | <p>Retain Rule AQ R1 as notified.</p> |

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| | mahinga noa – E whakaaehia ana | | | | NOTE: New text shown as <u>underlined</u> , and deleted text shown as strike-through |
| 9 | Rule AQ R2 General activities – Discretionary — Ngā mahinga noa – Ka whiriwhiria | 5 | Support | Fonterra supports a discretionary activity status being applied to air discharge activities that are not provided for in any other rule in the plan. | Retain Rule AQ R2 as notified. |
| 10 | Rule AQ R3 Miscellaneous Discharges – Permitted – Ngā tukunga matahuhua – E whakaaehia ana | 5 | Support in part | Fonterra submits that the discharge of contaminants to air from spray irrigation, soil injection, truck spreading or land soakage of milk, dairy factory wastewater, dairy liquids and/or other dairy factory by-products should be permitted under the Natural Resources Plan. Fonterra supports the retention of this rule, subject to the reference to 'noxious or dangerous' being removed, the breadth of activities covered under the rule being expanded to include truck spreading, in addition to spray irrigation, soil injection or land soakage, and the inclusion of milk dairy factory wastewater, dairy waste and dairy factory by-products. Alternatively, the definition of liquid waste could be amended to ensure it captures milk, dairy factory wastewater, dairy liquids and/or other dairy factory by-products so that these activities could be carried out as permitted activities. Fonterra seeks amendments to this rule to remove the reference to "noxious and dangerous". Fonterra considers that a significant proportion of the contaminants that are discharged to air would be captured under the very broad definition of "noxious and | Amend Rule AQ R3 as follows: Miscellaneous discharges – Permitted — Ngā tukunga matahuhua – E whakaaehia ana The discharge of contaminants to air from: (1) spray irrigation, soil injection, truck spreading or land soakage of liquid waste or milk, dairy factory wastewater, dairy liquids and/or other dairy factory by-products . (2) the ventilation and displacement of liquids in storage tanks and tankers (3) the use and application of fertiliser (4) the disturbance of land and soil carried out according to rules LM R1, LM R2, and LM R3 of this regional plan (5) contaminated land remediation permitted by DW R24 of this regional plan (6) are permitted activities provided the discharge is not noxious or dangerous, does not cause any offensive or objectionable odour or spray drift beyond the boundary of the subject property or into any water body . |

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| | | | | | <p>NOTE: New text shown as <u>underlined</u>, and deleted text shown as strike-through</p> |
| | | | | <p>dangerous” which would result in unnecessary and inappropriate restrictions on activities such as spray irrigation.</p> <p>In addition, Fonterra seeks amendments to recognise management measures that should be employed to ensure that the discharge of contaminants is not offensive nor objectionable beyond the boundary of the subject property. These amendments would place the onus on the discharger to use appropriate methods, rather than the management measures being dictated by the Council. Fonterra’s activities that would be covered by this rule have setbacks and buffer zones between wastewater disposal sites and other sensitive activities that manage the effects (eg odour), along with a range of other methods.</p> <p>Fonterra also seeks the deletion of the reference to discharge into waterbodies, as this is captured in other chapters of the Plan and also referenced in the advice note.</p> | <p>Advice Note - Discharge of liquid waste, and the use and application of fertiliser must also meet all other requirements of this regional plan (see DW Discharges to Water and Land and OSET On-site Effluent Treatment).</p> <p>Or</p> <p>Instead of amending Rule AQ R3 (1), amend the definition of 'liquid waste' as detailed in Submission Point 14 (but amend Rule AQ R3 (6) as outlined above in any event).</p> <p>And</p> <p>Delete the definition of “Noxious or dangerous” and make consequential amendments to all PC13 provisions referencing “Noxious or dangerous” as detailed in Submission Point 15.</p> |
| 11 | Rule AQ R19 Intensive farming – Controlled — Ngā mahi ahuhwhenua – E whakahaerehia ana | 14 | Support | <p>Fonterra supports a controlled activity rule for intensive farming and also supports that any consents for intensive farming required under Rule AQ R19 are processed on a non-notified basis.</p> | <p>Retain Rule AQ R19 as notified.</p> |
| 12 | Rule AQ R21 Specific activities – Discretionary— Ngā | 15 | Support | <p>Fonterra supports that plant-based air discharge activities are treated as discretionary activities.</p> <p>However, Fonterra seeks policy support for its activities so that the provisions of the air plan recognise the</p> | <p>Retain Rule AQ R21 as notified.</p> |

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| | mahinga tauwhāiti – Ka whiriwhiria | | | positive benefits of regionally significant industries and that these benefits can be considered alongside the management and protection policies. | NOTE: New text shown as <u>underlined</u> , and deleted text shown as strike-through |
| 13 | Definitions - Ambient air | 17 | Support | Fonterra supports the definition of Ambient air, particularly as it is identical to that of the Ambient Air Quality Guidelines (2002). | Retain the definition of Ambient air as notified. |
| 14 | Definitions - Liquid Waste | 18 | Oppose | Fonterra seeks amendment to the definition of liquid waste to specifically include milk, dairy factory wastewater, dairy liquids and other dairy factory by-products. These substances classified as hazardous are not suitable for disposal by the means included in the permitted activity rule. For example, Milk is classified as a hazardous substance but can be safely disposed of through the methods in Rule AQ R3. | Amend the definition of Liquid waste as follows: Liquid waste means any waste liquid composed of less than 20 % solids and does not include hazardous substances , but does include <u>milk, dairy factory wastewater, dairy liquids and other dairy factory by-products</u> . |
| | | | | | Or Amend Rule AQ R3 (1) as detailed in Submission Point 10 . |
| 15 | Definitions - Noxious or dangerous | 19 | Oppose | Fonterra opposes the breadth of this definition, and its lack of specificity if it is referenced in permitted activity Rule AQ R3. Fonterra seeks the deletion of reference to 'noxious or dangerous' in permitted activity Rule AQ R3. Fonterra considers that a significant proportion of the contaminants that are discharged to air would be captured under this definition, which is not appropriate and places an unwarranted level of regulation on activities such as spray irrigation. | Remove reference to " Noxious or dangerous " in Rule AQ R3 as detailed in Submission Point 10 . Or Delete the definition of "Noxious or dangerous" and make consequential amendments to all PC13 provisions referencing " Noxious or dangerous ". |

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| 16 | New Definition - Regionally Significant Industry | N/A | Support | <p>Alternatively, the definition of "Noxious or dangerous" could be deleted in its entirety, and consequential amendments made to all PC13 provisions referencing "Noxious or dangerous".</p> <p>The Edgecumbe Site is regionally significant, given the significant economic benefits to the Whakatane District and the wider Bay of Plenty Region. There should be recognition of this in the plan.</p> <p>Fonterra therefore seeks a new definition of 'Regionally Significant Industry' and amendments to relevant policies to reference 'Regionally Significant Industry' in the same manner as Regionally Significant Infrastructure is referenced.</p> <p>Fonterra's proposed definition is identical to that of the Waikato Regional Policy Statement. The Waikato Regional Policy Statement sets out a management regime for both Regionally Significant Industry and Regionally Significant Infrastructure that recognises their contributions to social and economic wellbeing.</p> <p>Fonterra considers that it would be appropriate for a similar management framework to be implemented in the Bay of Plenty Region. As the Bay of Plenty and the Waikato Region share a border, it is therefore entirely appropriate for the management of the air resource to be consistent. This approach provides for the cross-boundary, integrated management of effects.</p> | <p>Include a new definition for "Regionally Significant Industry" as follows:</p> <p><u>Regionally significant industry - means an economic activity based on the use of natural and physical resources in the region and is identified in regional or district plans, which has been shown to have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits.</u></p> |

