



**FURTHER SUBMISSION TO
BAY OF PLENTY REGIONAL COUNCIL PROPOSED PLAN CHANGE 13 – AIR QUALITY**

TO: Bay of Plenty Regional Council
BO POX 364,
WHAKATANE 3158

BY E-MAIL: air@boprc.govt.nz

SUBMISSION ON: **Proposed Plan Change 13 – Air Quality**

BY: Ballance Agri-Nutrients Limited

ADDRESS FOR SERVICE: Ballance Agri-Nutrients Limited
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TAURANGA 3143

Attention: **Mr Kevin Wood**

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INTRODUCTION

As identified in its primary submission, Ballance Agri-Nutrients Ltd (hereafter referred to as 'Ballance', or 'the Company') is a farmer-owned co-operative with over 19,000 shareholders and approximately 800 staff throughout New Zealand. We own and operate super-phosphate manufacturing plants located in Tauranga and Invercargill, as well as New Zealand's only ammonia-urea manufacturing plant located at Kapuni, South Taranaki. The Company also owns and operates the agricultural aviation company 'Super Air', 'SealesWinslow' (a high-performance compound feed manufacturer), and the farm technology company 'Ag Hub'. Ballance places a strong emphasis on delivering value to its shareholders and on the use of the best science to inform sustainable nutrient management.

GENERAL COMMENTS

As set out in the Company's primary submission, Ballance is generally supportive of the structure and content of the proposed Plan Change, subject to the minor amendments that it has already identified.

Ballance has an interest in the various provisions and submission points (provided within the attached Further Submission Table) that is greater than that of the general public.

Ballance's further submissions and the reasons for the same are set out within the following table, entitled 'Further Submissions to proposed Plan Change 13: Air Quality to the Bay of Plenty Regional Natural Resources Plan'.

Ballance wishes to be heard in support of its submissions and this further submission. If others make a similar submission the Company would consider presenting a joint case with them at any hearing.

Ballance cannot gain an advantage in trade competition through the further submissions set out in the attached Further Submissions Table.

Signature:



Kevin Wood

Environmental Manager

Date: 26th of July 2018

FURTHER SUBMISSION TO PROPOSED PLAN CHANGE 13: AIR QUALITY

Submitter Name	Submission Number	Relevant Provision / Submission Point	Support or Oppose	Reasons	Relief Sought
Jodie Bruning	21 - 2	<p>The Submitter’s requested relief that:</p> <p><i>Insert new objective</i></p> <p><i>Ensure the life-supporting capacity of water, soil and ecosystems is safeguarded</i></p> <p><i>Avoid, remedy or mitigate the adverse effects of bioaccumulation in water and soil systems from discharges of contaminants into air so that the life-supporting capacity of water, soil, and ecosystems are safeguarded.</i></p>	Oppose	<p>The reasons for Ballance’s opposition to the submission is as follows:</p> <p>The Regional Natural Resources Plan (‘RNRP’) already provides general objectives and policies seeking to avoid, remedy or mitigate adverse effects on the life supporting capacity of soil, water and ecosystems, such as objectives IM O1, IM O2, LM O1 and policy 68A. As a result, the proposed objective represents unnecessary repetition.</p>	<p>Ballance seeks:</p> <p>That submission 21-2 be rejected.</p>
Jodie Bruning	21 - 3	<p>The Submitter’s requested relief that:</p> <p><i>Insert new objective</i></p> <p><i>Protect the foreseeable needs of future generations</i></p> <p><i>Safeguard water, soil and ecosystems so that future generations may provide for their social, economic, and cultural well-being and for their health and safety. Where long term harm arising from discharge of contaminant is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm and a precautionary approach shall be taken.</i></p>	Oppose	<p>The reasons for Ballance’s opposition to the submission is as follows:</p> <p>The objective proposed is very broad and aspirational. Given its scope, it is considered that such an objective is more appropriate in a high level directional policy document, such as the Regional Policy Statement.</p>	<p>Ballance seeks:</p> <p>That submission 21-3 is rejected.</p>

Jodie Bruning	21 - 4	<p>The Submitter's requested relief that:</p> <p><i>Insert new objective</i></p> <p><i>AQ 05 Commitment to best practice science for monitoring, detection and restriction of discharges of emerging organic contaminants.</i></p> <p><i>Encourage and develop best international practice science for monitoring; detection and restriction of discharges into air, and resultant residues in water, soil and ecosystems of emerging organic contaminants.</i></p>	Oppose	<p>The reasons for Ballance's opposition to the submission is as follows:</p> <p>The objective proposed is very broad and aspirational. Given its scope, it is considered that such an objective is more appropriate in a high level directional policy document, such as the Regional Policy Statement.</p>	<p>Ballance seeks:</p> <p>That submission 21-4 be rejected.</p>
Mercury	36 - 6	<p>The Submitter's requested relief that:</p> <p><i>Delete Policy AQ P2 in its entirety.</i></p>	Support	<p>The reasons for Ballance's support to the submission is as follows:</p> <p>Ballance agrees with the submitter that the policy is unnecessary given the context of the other policies of the Plan Change and the management of hazardous substances via the Hazardous Substances and New Organisms Act.</p>	<p>Ballance seeks:</p> <p>That submission 36-6 be accepted.</p>
Oji Fibre Solutions	37 - 1	<p>The Submitter's requested relief that:</p> <p><i>Insert new objective.</i></p> <p><i>The operational requirements of activities, including heavy industry, other location specific industry, infrastructure, rural production activities and mineral extraction activities are recognised and provided for.</i></p>	Support	<p>The reasons for Ballance's support to the submission is as follows:</p> <p>Ballance is the operator of key significant infrastructure and has constraints regarding its necessity to be located close to the Port of Tauranga and its consolidated manufacturing facilities. The Company considers that the objective proposed by the submitter appropriately recognises this.</p>	<p>Ballance seeks:</p> <p>That submission 37-1 be accepted.</p>

Federated Farmers of New Zealand	76 - 3	<p>The Submitter’s requested relief that:</p> <p><i>Insert new objective.</i></p> <p><i>Enable appropriate activities</i></p> <p><i>Provide for discharges of contaminants to air from activities that are appropriate in the particular zone in which they are located.</i></p>	Support	<p>The reasons for Ballance’s support to the submission is as follows:</p> <p>Ballance agrees that the current structure of the Plan Change gives limited recognition of the social and economic wellbeing that is enabled by the operation of appropriate activities, and their associated discharges, being located within appropriate zones. In order to ensure that the proposed Plan Change provides a balanced approach to the management of air quality, the Company considers that such an enabling objective should be advanced.</p>	<p>Ballance seeks:</p> <p>That submission 76-3 be accepted.</p>
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