

# FURTHER SUBMISSION

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Further Submission on: Proposed Plan Change 13 (Air Quality) to the Regional Natural Resource Plan

Date: 31 July 2018

Submission by: **FEDERATED FARMERS OF NEW ZEALAND INC**

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1. FFNZ is a person representing a relevant aspect of public interest
2. FFNZ is a person who has an interest in the proposal that is greater than the interest the general public has.
3. FFNZ wishes to be heard in support of our submissions and further submission.

## FURTHER SUBMISSION TO PROPOSED PLAN CHANGE 13 – FEDERATED FARMERS OF NEW ZEALAND (FFNZ)

Section: Objectives				
Submission Number	Submitter Name	Section reference	Support/ Oppose	Reasons
45-24	Fonterra Ltd	New Objective	Support	An enabling objective is needed.
21-2	Jodie Bruning	New Objective	Oppose	Objectives focussing on discharge into water, or activities which effects soil and ecosystems are not appropriate in a plan change focussing on discharge into air. We also do not consider it necessary for a new objective as there are already appropriate objectives for these matters as well as for integrated management.
21-3	Jodie Bruning	New Objective	Oppose	The focus of Plan Change 13 is the management of discharge of contaminants into air. Objectives focussing on discharge into water, or activities which effects soil and ecosystems are accordingly not appropriate. We also do not consider it necessary as there are already appropriate objectives for these matters as well as for integrated management.
21-4	Jodie Bruning	New Objective	Support in part	Although we support better use of science, we consider that requiring a regional council to develop the best international practice science is not realistic, feasible or may well not be the most appropriate way to spend rates.
37-1	Oji Fibre Solutions	New Objective	Support	We agree that an enabling objective is needed.
37 -18	Oji Fibre Solutions	New Objective	Support	We agree that operational requirements of, amongst others, rural production should be recognised.

45-4	Fonterra Ltd	New Objective	Support	We agree that operational requirements of, amongst others, rural production should be recognised.
58-12	Horticulture NZ	New Objective	Support	An enabling objective is needed.
58-9	Horticulture NZ	AQ O2	Support	For reasons provided in HortNZ's submission.
<b>Section: Policies</b>				
<b>Submission Number</b>	<b>Submitter Name</b>	<b>Provision</b>	<b>Support/ Oppose</b>	<b>Reasons for Further Submission</b>
21-10	Jodie Bruning	New Policy	Oppose	We consider that the risks associated with soil fumigation should be appropriately managed rather than soil fumigation be bluntly avoided.
21-11	Jodie Bruning	New Policy	Oppose	Although we support better use of science, we are concerned about the proposed policy because it focuses on water, or activities which effects soil and ecosystems rather than air. It is also stated a preference on where Council's priority to spend its finances and other resource should be. This is more appropriately dealt with in the Long Term Plan rather than expressed as a policy.
21-16	Jodie Bruning	AQ P3	Oppose	We are concerned that the new subclause requires prevention of rather than management of risk and focuses on water, or activities on land. It is also so broadly stated that it will capture all contaminants (not only those discharged into air).
13-2	Gray Southon	AQ P3	Oppose	We understand the control of discharge to air of greenhouse gases by a regional council would undermine the methods preferred by Parliament to control greenhouse gas discharge.
21-6	Jodie Bruning	AQ P3(e)	Oppose	We consider that to avoid all contaminants post King Salmon will be too restrictive.

51 – 5	Nga Potiki Resource Management Unit	AQ P3(e)	Oppose	We consider that to avoid all contaminants post King Salmon will be too restrictive.
68-6	Ngati Ranginui Iwi Society Inc	AQ P3(e)	Oppose	We consider that to avoid all contaminants post King Salmon will be too restrictive.
21-7	Jodie Bruning	AQ P4 (new (h))	Oppose	We do not consider that the new subclause is a matter to consider rather it is a statement that the submitter does not agree with the current measurements.
37-15	Oji Fibre Solution	AQ P4 (new subclause)	Support	We agree that operational and location constraints should be considered.
66-19	First gas	AQ P4 (new subclause)	Support	We agree that operational and location constraints should be considered.
45-21	Fonterra Ltd	AQ P4 (new subclause)	Support	We agree that the economic and social wellbeing (benefits) of the activity should be considered.
66-18	First gas	AQ P4 (new subclause)	Support	We agree that the economic and social wellbeing (benefits) of the activity should be considered.
33-7	Balance Agri-Nutrients Ltd	AQ P4(g)	Support	For reasons provided in the submitter's submissions
21 - 8	Jodie Bruning	AQ P8	Oppose	Relief sought by the submitter will directly contradict AQ P8(a) which acknowledges that even with the best intent and practises spray drift may occur.

31 - 5	Tauranga Moana – Te Arawa ki Takutai Partnership Forum	AQ P8	Oppose	We are unsure of the exact changes that the submitter proposes for AQ P8 and accordingly cannot support it until better relief provisions are provided.
<b>Section: Rules</b>				
<b>Submission Number</b>	<b>Submitter Name</b>	<b>Provision</b>	<b>Support/ Oppose</b>	<b>Reasons for Further Submission</b>
45-25	Fonterra Ltd	AQ R3(1)	Support	For reasons provided in the submission
7-8	Western Bay of Plenty District Council	AQ R6	Oppose	The intent of AQ R6 is to provide for open burning outside of urban areas. The proposed changes by the submitter would extend the rule into other zones. FFNZ would seek to keep it within urban areas and consider it possible if the submitters relief could be further changed by adding the word “urban” before dwelling house.
58-44	HortNZ	AQ R15 (new subclause 6)	Support	We support requirements for the competency of the applicator of agrichemical for method AQ R15 (2)(c).
65-3	New Zealand Agrichemical Education Trust	AQ R15 (new subclause 6)	Support	We support requirements for the competency of the applicator of agrichemical for method AQ R15 (2)(c).
13-3	Gray Southon	AQ R15	Oppose	We understand the control of discharge to air of greenhouse gases by a regional council would undermine the methods preferred by Parliament to control greenhouse gas discharge.
21-12	Jodie Bruning	AQ R15(1) new subclause (d)	Oppose	Sensitive areas if not specific identified leaves a subjective discretion to the Council for a permitted activity and equally subjective is whether amenity values will be adverse effected.

21-13	Jodie Bruning	AQ R15(3)	Oppose	We consider the submitter's recommendation for signage and notification requirements are impractical and would require significant compliance costs.
21- 14	Jodie Bruning	AQ R15(4)	Oppose	We consider the submitter's recommendation for signage and notification requirements are impractical and would require significant compliance costs.
<b>Section: Definitions</b>				
<b>Submission Number</b>	<b>Submitter Name</b>	<b>Provision</b>	<b>Support/ Oppose</b>	<b>Reasons for Further Submission</b>
58-18	Horticulture NZ	Definition of 'urban property'	Support	For reasons provided in the submissions.

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

This submission is representative of member views and reflect the fact that resource management and government decisions impact on our member's daily lives as farmers and members of local communities.

