

NZ PORK



SUBMISSION ON Mackenzie District Plan PC27

23 January 2024

SUBMITTER: New Zealand Pork Industry Board

1. Introduction

The New Zealand Pork Industry Board (NZPork) welcomes the opportunity to submit on the Mackenzie District Plan PC27.

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

NZPork wishes to be heard in support of this submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Contact for service:

Hannah Ritchie
Environment and Planning Manager.
NZ Pork
PO Box 20176
Christchurch
8543



2. About the New Zealand Pork Industry

NZ Pork is a statutory Board funded by producer levies. It actively promotes "100% New Zealand Pork" to support a sustainable and profitable future for New Zealand grown pork. The Board's statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

The New Zealand pig industry is a highly productive specialized livestock sector, well integrated within New Zealand's primary production economic base. It draws on both downstream and upstream inputs and economic activity from New Zealand's rural sector including feed inputs, equipment and animal health supply, transport, slaughterhouse facilities plus further processing. Currently New Zealand's pig farmers produce around 45,350 tonnes of pig meat per year for New Zealand consumers. This represents around 38% of pig meat consumed by the domestic market, with the other 62% provided by imported pig meat from a range of countries. Nationally there are less than 100 commercial pork producers, comprising a relatively small but significantly integrated sector of the New Zealand agricultural economy. In 2007 it was estimated by the NZ Institute of Economic Research that the total economic activity associated with domestically farmed pigs was approximately \$750 million per annum.

Pigs' needs are unique compared to other farmed animals. They need constant access to shelter, a balanced diet and regular care and supervision. To meet these needs, New Zealand's commercial pig farmers have adopted a range of farming methods. Many farmers prefer indoor farming because they believe it allows them to provide the best care for the

modern animal by allowing them to carefully manage their environment. Approximately 55% of New Zealand's pigs are farmed in this way.

The other 45% of New Zealand's commercial breeding herd is farmed outdoors. Outdoor breeding (also called free-farmed pork) can only occur in a moderate climate with low rainfall and free-draining soil conditions. In New Zealand, these conditions are mostly found in Canterbury. In most free-farmed systems, sows are farmed in groups in paddocks during gestation with huts for shelter and shade. When sows farrow, they are provided with individual, dry and draught-free huts with straw for warmth. A variety of housing systems are then used to house pigs after weaning, including indoor barns or open-air sheds.

New Zealand pork producers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years, placing further demands on producers who have responded by developing increasingly efficient systems. Currently, nearly all pork produced in New Zealand is consumed locally and makes up less than 40% of the domestic market supply.

The New Zealand pork industry is dedicated to producing environmentally sustainable pork. NZPork is proactive in supporting farmers to reduce environmental impacts through investing producer funds into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions and by-product reuse. Pig farmers in New Zealand have a firm grasp of environmental issues and demonstrate a high level of innovation and environmental stewardship. The New Zealand pork industry has committed significant time and resource to Sustainable Farming Fund projects centered on environmental initiatives, including development and implementation of Environmental Guidelines and Nutrient Management Guidelines. However, profit margins for the industry remain tight and dialogue with farmers has indicated that compliance costs and uncertainty into the future are key issues.

3. Specific submission points on PC27.

Provision to which our submission relates	Our position on this provision is:	The reasons for our submission are:	The decision we want Council to make
EARTHWORKS			
Policies			
EW-P1	Support in part	<p>The chapter introduction identifies that earthworks and land disturbance are an essential part of the use and development of land. Earthworks and land disturbance on a variety of scales is then enabled through the activity listing.</p> <p>However, EW-P1 limits enabling policy support for only small-scale earthworks. This does not align with the activities listed within permitted earthworks for the purpose of maintenance or repair or general earthworks, many of which are not small scale but are necessary ancillary farming earthworks and typically temporary in nature and affect.</p>	<p>Amend EW-P1 as follows:</p> <p><i>Enable Earthworks</i></p> <p><i>Enable <u>temporary and small-scale</u> earthworks.</i></p>
Rules			
EW-R1	Oppose in part	Oppose the limitation of EW-R1 to activities for the purpose of maintenance and repair (not development). Many of the activities listed are necessary ancillary farming earthworks and	Ancillary farming earthworks (maintenance and repair and development) should be permitted.

		typically temporary in nature and affect. While some may fall within the permitted activity thresholds of EW-R4, many will not and thereby be subject to a consenting process.	As an alternative the permitted activity thresholds of EW-R4 should be amended.
EW-R2	Support in part	<p>Support the permitted activity regime for the following activities:</p> <ul style="list-style-type: none"> a. for cultivation; b. holes for trees or other plants; c. for the installation of fence posts; or d. for an offal or farm rubbish pit. <p>The permitted activity listing should extend to earthworks associated with burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer and as directed by a person authorised under the Biosecurity Act 1993.</p> <p>A person who is subject to a Notice of Direction under the Biosecurity Act 1993 is required to comply with that notice. The most appropriate method of compliance and the timing for compliance will depend on the circumstances in each case, including the nature of the biosecurity incursion. There may not be time to wait for an application for a resource consent for earthworks to be processed under a district plan. The person may find themselves in the invidious position of</p>	<p>Amend as follows:</p> <p>Activity Status: PER</p> <p>Where:</p> <ul style="list-style-type: none"> 1. The earthworks are: <ul style="list-style-type: none"> a. subject to a building consent; b. for gardening; c. for cultivation; d. holes for trees or other plants; e. for the installation of fence posts; or f. for an offal or farm rubbish pit. g. <u>For burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer and as directed by a person authorised under the Biosecurity Act 1993.</u> <p>And the activity complies with the following standards:</p>

		<p>having to breach their legal obligations under one statute to comply with another.</p> <p>It is important to recognise that not all biosecurity incursions would meet the threshold of a biosecurity emergency that would trigger provisions in the Resource Management Act 1991 (as emergency works) or the provisions in s7A of the Biosecurity Act 1993, which overrides Part 3 of the Resource Management Act 1991.</p> <p>The best management method for any biosecurity risk will depend on the nature and location of the incursion and may involve manual or chemical treatments and disposal of infected material by burning, burial or removal to a specific disposal facility. The transfer of infected material offsite may have unacceptable spread risks. Furthermore, suitable facilities may not be available to receive the infected material. The most appropriate method of disposal can and will be determined by the appropriately qualified personnel dealing with the incursion.</p> <p>Additional constraints on earthwork activity at a district plan level (e.g., volume, area, maximum depth) may inhibit a timely, efficient, and effective response.</p>	<i>EW-S4 – Accidental Discovery Protocol</i>
EW-R4 GRUZ	Oppose	A discretionary activity status when compliance is not achieved with R4.2 is unnecessarily onerous on necessary ancillary farming earthworks.	Amend EW-R4 as follows:

		<p>It is not clear in the s32 why the controlled activity framework for marginally more flexible earthworks and area volume thresholds is an effective or efficient method.</p> <p>If earthworks of up to 1500m³ by volume and 2500m² by area is guaranteed to get consent, a more appropriate framework would establish a RDIS tier.</p>	<p>Activity Status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> 1. Earthworks on any site shall not exceed 1000m³-1500m³ by volume and 1000m²-2500m² by area per site in any 5-year period. <p>And the activity complies with the following standards:</p> <p>EW-S1 – Maximum slope Gradient EW-S2 – Excavation and Filling EW-S3 – Rehabilitation and Reinstatement EW-S4 – Accidental Discovery Protocol EW-S5 – Specific Locations EW-S6 – Proximity to the National Grid</p> <p>Activity status when compliance is not achieved with R4.1: CON RDIS</p> <p>Where:</p> <ol style="list-style-type: none"> 2. Earthworks on any site is more than 1000m³ but less than 1500m³ by volume, and is more than 1000m² and less than 2500m² by area per site in any 5-year period. <p>And the activity complies with the following standards:</p> <p>EW-S1 – Maximum Slope Gradient EW-S2 – Excavation and Filling EW-S3 – Rehabilitation and Reinstatement EW-S4 – Accidental Discovery Protocol</p>
--	--	---	---

			<p>EW-S5 – Specific Locations EW-S6 – Proximity to the National Grid</p> <p>Matters of control discretion are limited to:</p> <ul style="list-style-type: none"> a. The effects of stockpiling. b. The visual effects on landscape values. c. Where any earthworks are within a SASM, those matters in SASM-MD1 Activities in a SASM. <p>Activity status when compliance is not achieved with R4.2: DIS</p> <p>Activity status when compliance with standard(s) is not achieved: Refer to relevant standard(s).</p>
SUBDIVISION			
Objectives			
SUB-O1	Support in part	SUB-O1 requires subdivision to align with the purpose and character of the zone in which it occurs. For the rural zone this translates to methods that support and enable primary production and avoid reverse sensitivity.	Retain SUB-O1 with additional new policy support.
Policies			
SUB-P10	Oppose in part	The subdivision of land is an irreversible process and can introduce smaller or rearranged parcels that support activities sensitive to the effects of primary production.	<p>Amend SUB-P10 as follows:</p> <p><i>Avoid reverse sensitivity effects of subdivision on existing renewable electricity generation assets and activities, <u>regionally significant infrastructure, transport networks, primary production activities</u></i></p>

		The SUB-P10 is the only subdivision policy relevant to reverse sensitivity and is specific to existing renewable electricity generation assets and activities. This does not then align with the objective SUB-O1 nor the matter of discretion MD7 that extends the consideration to other activities.	<u>(including intensive primary production) and rural industry.</u>
Rules			
SUB-R1	Support	Support RDIS activity status for boundary adjustments that enables a focused assessment on relevant matters and the ability to grant consent with conditions or decline consent where the plan outcomes sought are not met.	Retain SUB-R1
SUB-R2	Support	Support RDIS activity status for subdivision meeting the prescribed standards that enables a focused assessment on relevant matters and the ability to grant consent with conditions or decline consent where the plan outcomes sought are not met.	Retain SUB-R2
Standards			
SUB-S1 GRUZ	Oppose in part	<p>The standards sets out that every allotment created shall contain a building square not less than 15m x 15m.</p> <p>The building square should be identified at time of subdivision as compliant with all applicable land use setback standards including:</p>	<p>Amend SUB-S1 as follows: Allotment Size and Dimensions</p> <p>GRUZ</p> <ol style="list-style-type: none"> 1. <i>Every allotment created shall comply with Table SUB-1.</i>

		<ul style="list-style-type: none"> GRUZ-S2 Boundary Setbacks GRUZ-S5 Sensitive Activity Setback from Intensive Primary Production 	<p>2. <i>Every allotment created shall contain a building square not less than 15m x 15m <u>demonstrating compliance with all setbacks standards set out in GRUZ.</u></i></p> <p>3. <i>This requirement shall not apply to any allotment created solely for access, reserves, or network utility operations.</i></p>
Matters of discretion			
SUB-MD7	Support in part	The matters of discretion should be extended to a consideration of reverse sensitivity effects on other activities.	<p>Amend SUB-MD7 as follows</p> <p>a. <i>Whether there is a need to provide a separation from zone boundaries, regionally significant infrastructure, transport networks, rural activities <u>primary production activities</u> (including intensive primary production, and rural industry, or other mitigation measures to avoid or minimise potential for reverse sensitivity effects.</i></p>

END OF SUBMISSION.