



12 December 2016

Water New Zealand  
Rachhod Tower  
Level 12, 30 The Terrace  
PO Box 1316  
Wellington 6140

Attention: Nick Walmsley

**Re: Water New Zealand Good Practice Guide- Beneficial Use of Organic Materials on Land**

Thank you for the opportunity to provide comment on this guide.

Both Ian Barugh (Massey University) and I have reviewed the guide and our comments are on the following pages.

Please don't hesitate to get in touch with me if you have any queries regarding our comments.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jeska McHugh".

Jeska McHugh  
Environmental Advisor  
Phone: 021 453 752, email: [jeska.mchugh@pork.co.nz](mailto:jeska.mchugh@pork.co.nz)

### Comments

Clause	Comment	Suggested Amendment
1.1.1 Inclusions	Composting of dead pigs is the preferred disposal method for our industry.	NZPork suggests that the inclusion section be expanded to include dead stock that do not pose a biosecurity risk.
1.1.1 Inclusions	Having the sentence on diseased animals in the inclusions section could be confusing to the reader.	NZPork suggests that diseased animal waste be moved to the exclusions section 1.1.2.
2.1 Overview of Requirements and 8.1 Nitrogen Content and Application Rates	The 200kg/ha limit is becoming less relevant in certain regions of New Zealand as councils seek to set limits on a catchment level and are more effects based e.g. N leaching	NZPork suggests that the 200kg N/Ha/year is removed and a specific limit is not referenced in the guide.
3. Risk Management Issues	Taking a risk based approach is very important. The reader may find it useful to have a list of suitable methodologies for risk assessment.	NZPork suggests to consider including a list of suitable methodologies to assess risk such as AS/NZS ISO 31000:2009 risk management and guidelines.
3.6 Sensitivity to the Receiving Environment	Some regional rules are using good management practices as an alternative to prescribed distances.	NZPork suggests that the 20m distance is removed and a distance is not prescribed but there is a requirement to have a plan in place to limit the ingress of material into the waterway.
3.8 Proximity to Aquifers and Surface Water Bodies	Some regional rules are using good management practices as an alternative to prescribed distances.	NZPork suggests that the 20m distance is removed and a distance is not prescribed but there is a requirement to have a plan in place to limit the ingress of material into the waterway.
3.6 Sensitivity of the Receiving Environment and 3.9 Presence of 'Sensitive' Areas and 3.11 Social and Cultural Considerations	The application of organic materials to land can give rise to odour and issues of reverse sensitivity. There are sectors of the community where the sensitivity is higher. Considering listing a wider range of sensitive receiving environments.	<p>NZPork suggests to add into the appropriate section a list of sensitive receiving environments including but not limited to: hospitals, schools, childcare facilities, marae, residential homes etc.</p> <p>Social and cultural consideration are mentioned briefly in three sections 3.6, 3.9 and 3.11. Consider consolidating this into one section.</p>

Comments continued...

Clause	Comment	Suggested Amendment
4.2 Proven Production Process	This guide represents an opportunity to encourage environmental sustainability practices and the reduction of greenhouse gas emissions.	NZPork suggests to consider adding in a sentence regarding biogas collection from anaerobic effluent storage ponds.
6.1 Environmental Management Systems (EMS)	The guide references the quality management standard and not the environmental management standard.	NZPork suggests to include a reference to the relevant ISO standard which is <i>ISO 14001:2015 Environmental management systems- Requirements for guidance for use</i> (Note: this is the same as AS/NZS ISO 14001:2016)
6.6 Health and Safety Precautions	This guide does not reference any relevant New Zealand guidance. WorkSafe New Zealand have published guidance and factsheets on Legionnaire's disease, respiratory protection equipment, workplace exposure standards and biological indices 2016.	NZPork suggests to include relevant WorkSafe New Zealand guidance as useful additional guidance in addition to the NIOSH reference.
7.1 Transportation	Material Safety Data Sheet is an outdated term.	NZPork suggests to use the term 'Safety Data Sheet' as a replacement for 'Material Safety Data Sheet'.
Schedule 1 Material Safety Data Sheet	Material Safety Data Sheet is an outdated term.  New Zealand has regulations for Safety Data Sheets (see <a href="http://www.epa.govt.nz/hazardous-substances/using-storing/Pages/Safety-data-sheets.aspx">http://www.epa.govt.nz/hazardous-substances/using-storing/Pages/Safety-data-sheets.aspx</a> )	NZPork suggests to amend the example Safety Data Sheet to include the 16 headings required under the HSNO Act.

End of Comments