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31 March 2017

**RE: Draft Water New Zealand Good Practice Guide for the Beneficial Use of Organic Waste Products on Land**

Thank you for the opportunity to submit feedback on the draft Good Practice Guide for the Beneficial Use of Organic Waste Products on Land.

Silver Fern Farms as a farmer co-operative based company also has a vested interest in guidance documents that may be associated with farming activities. However, we generally support and rely upon, industry good bodies such as Beef + Lamb NZ, Deer Industry NZ, Meat Industry Association, and Federated Farmers to make commentary on those aspects as they are better placed to do so.

Our feedback is largely limited to those parts of the draft guidelines relevant, and with potential impact on, our processing operations and supporting activities.

Silver Fern Farms applies bio-solids from processing wastewater treatment operations to land, manufactures and sells compost (under the brand name Bio-Blend), and supply material to third parties to manufacture and sell compost (under our Bio-Blend brand, or their own proprietary brand).

Feedback is provided in the attached table, based primarily on the key questions raised in the public consultation, but also containing matters of relevance to Silver Fern Farms.

Please direct any questions or correspondence to Kathy Robertson from our Group Environmental team by phone (027 532 9751) or email ([kathy.robertson@silverfernfarms.co.nz](mailto:kathy.robertson@silverfernfarms.co.nz)).

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Daryn Jemmett", written over a white background.

**Daryn Jemmett**  
**Group Environmental Manager**



Provision / Question	Support / Oppose / Response	Explanation
Use of the term 'waste products'	Neither support or oppose	Silver Fern Farms contends whatever terminology is used this must be clear and only reflect those specific activities to be managed under the guidelines. Rather than a catch-all term that potentially may capture all other sludge's, sediments, by-products that could be discharged to land from a modern food processing facility.
Should the nomenclature used in the 2003 Biosolids Guidelines remain i.e., Aa, Ab, or replaced with 1A, 1B	Neither support or oppose	Silver Fern Farms believes it is unclear as to intent of the proposed change. Rather than focusing on Aa versus 1A <i>per.se</i> , the question should be more about standardising nomenclature with that used internationally.
Should measurement of emerging organic contaminant limits be mandatory for all biosolids applied to land so that a New Zealand database can be established more quickly, giving a greater ability for evidence based review?	Neither support or oppose	<p>Silver Fern Farms questions:</p> <ul style="list-style-type: none"> <li>• Whether the cost implication associated with mandatory monitoring and managing a national database is justified.</li> <li>• Would a simple baseline study against the EU data / limits be more appropriate to gauge where NZ products may lie.</li> <li>• Who would be responsible for managing the database, who would have access to the data and for what purpose? <ul style="list-style-type: none"> <li>○ Whilst the intent may be to develop an industry good database there is a high risk that these 'Good Management Practices' could be adopted by Councils' as statutory requirements.</li> </ul> </li> </ul>



<p>Volume 1 The Guide is intended to give practical guidance. Is the information clear enough, in the correct format, split adequately between background/supporting information (Technical Manual) and the Guide?</p>	<p>Neither support or oppose</p>	<p>To manage perceived risk to animal health from stock consuming crops that been grown on meat processing material as a nutrient source, Silver Fern Farms have applied a withholding period in order to meet both the Biosecurity (Ruminant Protein) Regulations and NZ Code of Practice for the Design and Operation of Farm Dairies (NZCP1).</p> <p>Given this is a somewhat different reason to that outlined in s.4.4 of the Guide, should other stock exclusion reasons, or other related matters, also be included in either the Guide or referenced via other documents in the technical manual.</p>
<p>What positive or negative impacts will the proposed changes have on your business?</p>	<p>Negative</p>	<p>As outlined earlier, it is somewhat unclear exactly how the proposed guidelines would impact Silver Fern Farms activities, i.e., does it only relate to composted material or include all other sludges, sediments, etc.</p> <p>However, this notwithstanding increased monitoring parameters would simply increase overall costs.</p>
<p>Inference that biosolids should be incorporated into soil (e.g., s.9.4).</p>	<p>Oppose</p>	<p>By definition, Silver Fern Farms bio-solids would not be captured by the guideline as they do not contain human material.</p> <p>However, should not any management tool to manage potential exposure to pathogens such as this only be considered based on actual level of risk rather than as a blanket rule?</p>



Limiting nitrogen application rates	Oppose	<p>Whilst Silver Fern Farms understands the need to determine an appropriate application rate, we however oppose setting an upper nitrogen limit within the guideline.</p> <p>Depending on soil types, cropping regime, stock type etc. many different application rates may be appropriate. Regional Council's determine in their relevant plans what is acceptable for regions and catchments based on actual leakage / drainage rates.</p> <p>This guide should not be setting a blanket limit as this could easily be adopted by rules in regional plans as Good Management Practice without accounting for catchment variations, or land management activities to minimise leakage.</p>
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