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9 March 2018

RE: Draft Water New Zealand Guidelines for Beneficial Use of Organic Materials on Productive Land

Thank you for the opportunity to submit feedback on the draft Guidelines for Beneficial Use of Organic Materials on Productive 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. Given a number of our previous comments on the discussion document have not been accounted for in the revised draft, we have duplicated a number of those into this feedback.

Silver Fern Farms applies bio-solids, screened material, and liquids from meat processing wastewater treatment operations to land; manufactures and sells compost manufactured from material coming from our wastewater treatment



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processes; and, supplies material coming from our wastewater treatment processes to third parties to manufacture and sell compost.

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).

Kind regards,



Daryn Jemmett
Group Environmental Manager



Provision / Question	Support / Oppose	Explanation
<p>s.1.1.1 Inclusions</p> <p>Use of the term “meatworks wastes”</p>	<p>Neither support or oppose</p>	<p>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.</p>
<p>s.1.3 Purpose of this guide</p> <p>“... it is expected that all New Zealand councils will use this guidance consistently and integrate the good practice into their district and regional plans and resource consents with industry acceptance and support.”</p>	<p>Oppose</p>	<p>Whilst Silver Fern Farms understands the need to help regulators make consistent outcomes, we need to be very careful not to set untenable expectations.</p> <p>By way of example, setting a nitrogen loading limit that is not based on the effects on the receiving environment, or the actual net-nutrient budget management process, makes it very difficult through the consenting process, especially if the requested consent application rates are inconsistent with industry guidelines. For cut-and-carry activities, an application rate of 600kgN/ha/yr is regularly agreed upon as a discretionary activity by the regulatory authorities.</p> <p>Instead of prescribing a fixed application rate, the guideline in any regulatory framework would be more beneficial as a possible permitted activity level baseline for the regulatory authorities.</p> <p>In context of the nitrogen loading, the threshold should be focussed on the resultant effects on the receiving environment rather than as an application based limit.</p>



Provision / Question	Support / Oppose	Explanation
s2.1 Establishment of a New Zealand database for organic contaminants administered by appropriate ministries.	Neither support or oppose	<p>Silver Fern Farms questions:</p> <ul style="list-style-type: none"> • 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"> ○ 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.
s3.1 Overview of Requirements Amended nomenclature for grading.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.
Table 5.5. Product contaminant concentration limits Amended Emerging Organic Compounds (EOC) listing for testing	Negative	<p>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>
8.2.2 Fencing and Signage Clarification if biosolids were to include treated meatwork wastes and how this would relate to any applications of treated wastewater to land.	Neither support or oppose	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).
s9.1 Limiting nitrogen application rates	Oppose	Whilst Silver Fern Farms understands the need to determine an appropriate application rate, we however oppose setting an upper nitrogen limit within the guideline.



Provision / Question	Support / Oppose	Explanation
		<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>
s9.4 Inference that biosolids should be incorporated into soil.	Oppose	<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>

END

