



The Proposed Regional Policy Statement for the Wellington Region 2009

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1. INTRODUCTION

- 1.1 This submission is made by Fonterra Co-operative Group Limited (Fonterra). Fonterra is New Zealand's largest company, accounting for 25% of New Zealand's total export earnings and 94% of New Zealand's dairy production.
- 1.2 Fonterra has dairy farming and processing interests in the Wellington region. There are currently 181 dairy farms in the Wellington region that supply milk to Fonterra. Fonterra owns and operates the Te Roto site (Kapiti) which is a producer of speciality cheese. The farms that supply Fonterra are significant employers in those rural areas of the region where they are clustered and contribute in a meaningful way to the regional economy and community.
- 1.3 Fonterra is mindful of the impact of its operations on society and the environment, and is committed to ensuring that it carries out its business in a responsible and sustainable manner.
- 1.4 Fonterra strives to lead the way toward better environmental performance on dairy farms. Fonterra, developed the "Dairying and Clean Streams Accord" (May 2003) to promote sustainable dairy farming in New Zealand.
- 1.5 Fonterra welcomes the opportunity to comment on the "Proposed Regional Policy Statement for the Wellington Region 2009" and looks forward to continued involvement throughout the development of the Regional Policy Statement (RPS).

2. Individual Submission Points

Below are Fonterra's individual submission points in the order of the document and related to the issues and discussion points raised in the discussion document.

2.1 3.4 Freshwater

Fonterra supports the development of a regional water strategy (Obj 12 Method 33). This strategy should include consideration of the economic and social objectives of the region that will also be impacted upon by water resource management decisions, rather than focus solely on the achievement of aquatic environment outcomes. Fonterra would welcome the opportunity to input to the development of such a strategy.

2.2 Fonterra supports the use of industry led environmental accords and codes of practice (Method 35) in the achievement of environmental objectives relating to water quality and water allocation, and in other areas where this approach reduces barriers (consent costs etc) to the uptake of good or best practice.

2.3 Fonterra would like to see Method 35 (Support industry led environmental accords and codes of practice) considered as an appropriate way to achieve Objective 14 (Water use efficiency).

2.4 Fonterra notes that any soil is unable to sustain high levels of growth, whether farmed intensively or extensively, without minerals and nutrients being replaced within the soil reserve (3.11 Soil and minerals). This is not a phenomena peculiar to intensive farming.

2.5 Fonterra supports the consideration of action that can be taken to retain highly productive agricultural land (Policy 59).

2.6 Policy 12 – Fonterra would support the addition of explicit considerations of and support for the storage and associated improvements to water infrastructure, to assist in meeting the medium to long term water needs of the rural and urban communities.

2.7 Policy 15 – Fonterra supports the use of rules and methods that promote discharges of animal waste to land rather than to water.

2.8 Policy 16 – Fonterra supports actions to prevent stock access to rivers, lakes and wetlands where such access causes adverse environmental impacts. Fonterra requests that 1) Method 35 be the initial approach taken to achieve this and 2) the range of water ways etc from which stock are to be excluded are defined following consideration of the balancing of desired environmental benefits with the costs to the land owner and practicality of achievement.

2.9 Policy 18 – Fonterra supports the promotion of the efficient use of water.

2.10 Policy 19 – Fonterra seeks clarity that this policy provides equal priority for water takes for public water supply as that held by qualifying Section 14 (3) water takes and does not provide greater priority for such a take.

- 2.11 Policy 43 – Fonterra supports the general tenor of this policy however the extent to which consent holders are required to measure and report water take, and the detail of any water demand and conservation measures should be proportional to the scale and potential for adverse environmental effects of the water take, and the ability of the regulator to make use of this information.
- 2.12 Policy 59 – Fonterra supports active consideration of the long term irreversible impacts of losing Class I and II land from production, when considering applications for resource consent, or changes, variations or replacements to a district plan.
- 2.13 Section 4.4 Non-regulatory policies – as mentioned previously within this submission, Fonterra supports non-regulatory approaches to achieving objectives and believes that this approach is well established, and successful, within the dairy industry.

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Date: 8 May 2009