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Planning standards  
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## Draft National Planning Standards Submission Form

### Submitter details

Organisation: Tegel Foods Ltd ("Tegel")



Contact number:



Contact email:



### Introduction

- 1 This is a submission on the Draft National Planning Standards.
- 2 Tegel is submitting on the *Draft Area Specific Matters* and *Draft Definitions* within the National Planning Standards. For ease of processing, the attached submission table separates the submission points into different categories.

### Scope of Submission

The aspects of the Draft National Planning Standards that this submission relates to are:

- S-ASM: Draft Area Specific Matters Standard
- CM-1: Draft Definitions standard

### Submission

Our submission is set out below:

#### Background

Tegel is New Zealand's leading poultry producer, established in 1961. Tegel processes approximately 58 million birds per year, across vertically integrated operations from feed procurement and feed-milling to breeders, hatcheries, farms, processing facilities, and distribution.

Tegel operates across the country with existing key facilities located in the Waikato, Auckland, Canterbury, and Taranaki regions. The National Planning Standards are therefore a welcome tool to provide consistency and standardisation with regard to the consenting of our facilities across New Zealand. They also have the potential to greatly influence the operation and future development of sites or services relating to the poultry industry. As a result we take great interest in their development. To provide context for this submission, the types of farms that Tegel operates is summarised below.

Breeder farms produce fertile eggs into the hatcheries in order to provide chicks into the grower farms. With over forty such farms across New Zealand, these are the basis for Tegel's business. Breeder farms have high levels of biosecurity to protect the exotic disease free status of the poultry industry in New Zealand. Ideally, breeder farms are located in close proximity to hatcheries to reduce travel time and to maintain animal welfare standards.

Hatcheries take the fertilised eggs, incubate them, and produce day old meat growing chicks. Incubation takes approximately 21 – 25 days. Once the chicks are hatched, the birds are inspected, sorted by sex and then transported to the grower farms on the same day. Specialised climate-controlled trucks are typically used to transport the birds.

Tegel grower farms are either free range or barn raised and are always cage free. The birds are grown from day old chicks to approximately 38-42 days old. For free range facilities young birds are kept safe and warm inside until they are approximately 20 days old and have plumage. At this point the sides of the sheds can be opened and the birds are free to range during day light. When they have reached the required weight they are removed from the sheds and transported to the processing plant for processing and ultimately distribution.

### **Decision sought from the Ministry for the Environment**

Tegel seeks the following decision from the Ministry for the Environment:

- Amend the Draft National Planning Standards in accordance with the 'relief sought' in the attached table (Attachment A), or words to like effects (additions underlined, deletions ~~struckthrough~~).

Date: 17 August 2018



Signature: \_\_\_\_\_

Emma Coote

Environmental Manager – Tegel Foods Limited

Reference	Provision wording	Support/ Oppose	Comment	Relief sought
<b>S-ASM: Draft Area Specific Matters Standard</b>				
Rural Production zone	The purpose of the Rural production zone is to prioritise primary production activities that rely on the productive nature of the soils, intensive primary production, and also providing for associated rural industry.	Support in part	Intensive primary production and rural industry do not rely on the productive nature of the soils. Therefore it needs to be made clear that these are separate aspects of the rural production zone and not considered together.	Amend text as follows: The purpose of the Rural production zone is to prioritise primary production activities that rely on the productive nature of the soils, <u>and/or</u> intensive primary production, <u>and/or also</u> providing for associated rural industry.
<b>CM-1: Draft Definitions standard</b>				
Fertiliser	(a) means any substance or biological compound that is— (i) applied to plants or soils, whether in solid or liquid form; and (ii) supports or sustains the growth, productivity or quality of soils, plants or, indirectly, animals; but (b) does not include livestock and human effluent, or pathogens	Oppose	Poultry litter once removed from the sheds (containing bedding and manure) is often spread to land as a valuable fertiliser. Therefore, Tegel considers that livestock effluent or manure be included in this definition, rather than excluded.	Amend text as follows: (a) means any substance or biological compound that is— (i) applied to plants or soils, whether in solid or liquid form; and (ii) supports or sustains the growth, productivity or quality of soils, plants or, indirectly, animals; but (b) does not include <del>livestock and human effluent, or pathogens</del>

Intensive Primary Production	Means primary production activities that involve the production of fungi, livestock or poultry that principally occur within buildings	Support in part	Tegel supports this definition, subject to new definitions being provided for poultry farming. Poultry farming has inherently different effects from other types of intensive primary production activities and therefore should be considered separately.	Retain as currently worded, subject to new definitions being provided.
Notional boundary	Means a line 20 metres from any side of a building that contains an activity sensitive to noise, or the legal boundary, if it is closer to that building	Support in part	There is no definition in the Draft National Planning Standards that outlines the meaning of “activities sensitive to noise”. This term is subjective and will have implications when implementing noise rules.	Provide a new definition for “noise sensitive activities”.
Primary production	a) means any agricultural, pastoral, horticultural, forestry or aquaculture activities for the purpose of commercial gain or exchange; and b) includes any land and auxiliary buildings used for the production of the products that result from the listed activities; but c) does not include processing of those products	Support in part	As specified above, Tegel supports this definition, subject to new definitions being provided for poultry farming.	Retain as currently worded, subject to new definitions being provided.
Reverse sensitivity	Means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration	Support	Tegel supports this definition, as it is necessary that lawfully established farms are not compromised by establishing sensitive activities.	Retain as currently worded.

	of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing activity			
Rural industry	Means an industrial activity where the principal function supports primary production or aquaculture activities	Support	Tegel considers there are activities that are industrial in nature, but must be situated in a 'rural zone', for example quarrying or transport depots.	Retain as currently worded.
Sewage	Means any water that contains any toilet or urinal waste, or any waste in water from industrial or commercial processes	Oppose	Trade waste that is produced from industrial or commercial premises is different to that produced from toilet or urinal waste and is treated differently. Therefore, Tegel considers that a separate definition for trade waste is provided.	Provide a new definition for "trade waste".
Wastewater	Includes sewage, and greywater	Oppose	As specified above, the definition treats sewage and trade waste together. Tegel considers that these should be separated out as they are different types of waste.	Includes sewage, <u>trade waste</u> , and greywater
Poultry farming (new definition)	There is currently no definition for poultry farming	-	Tegel considers that a definition for poultry farming should be provided in the National Planning Standards, to ensure consistency with definitions across the country. As specified above, poultry farming results in different effects from other types of intensive farming and therefore it is considered that this should be separated out. Tegel (as well as other poultry producers) operates many farms in various parts of	Add definition as follows: <u>The commercial raising of poultry for meat and egg consumption and for breeding purposes, where birds are housed in either stationary, permanent or moveable structures or buildings. Includes free-range poultry farming.</u>

			the country and therefore it is considered an industry specific definition is justified in the National Planning Standards. This will assist in the creation of provisions for poultry farming when plans are drafted.	
Free-range poultry farming (new definition)	There is currently no definition for free range poultry farming	-	As specified above, Tegel considers that a definition for free-range poultry farming should be provided.	Add definition as follows: <u>The commercial raising of poultry where birds are housed in either stationary, permanent or moveable structures or buildings which enable them to have access to the outdoors.</u>