

Proposed Natural Resources Plan:

Submitter:

Wairarapa Winegrowers Association

Submitter Number:

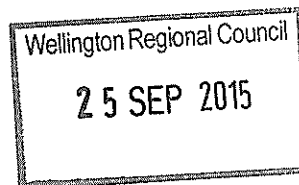
S103

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region
This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to
Clause 6 of Schedule 1, Resource Management Act 1991



To: Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

Or email: regionalplan@gw.govt.nz



Your details

Full name: Paul Mason (Chair of Wairarapa Winegrowers Association)

Organisation name: (If applicable) Wairarapa Winegrowers

Address for Service: C/o T De Jonge, Secretary Wairarapa Winegrowers, 15 Colonge Street, Martinborough

Telephone no's: Work: N/A Home: N/A Cell: 021 457 980

Contact person: Paul Mason

Address and telephone no (if different from above):

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address: info@wairarapawinegrowers.co.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission. [Go straight to Your Submission]

I/we could gain an advantage in trade competition through this submission.
If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

I/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Your submission

Wairarapa Winegrowers Association (WWGA) is a non-profit organisation that is the regional representative of NZ Winegrowers.

We represent all local vineyard owners and wineries within the greater Wairarapa region. We currently have around 80 members ranging from small vineyard owners to large wineries that export to many countries around the world.

By paying winemaking excise and/or grape grower levies to NZ Winegrowers, companies automatically become members of WWGA.

WWGA has a number of key aims and objectives:

- To provide advocacy to its members
- To provide general advice with regard to grape growing and wine making
- To organise and operate a programme of continuing education for grape growers and wine makers
- To help the general promotion of Wairarapa grapes and wines
- To hold meetings and take action as necessary to meet aims and objects

Members have access to material from New Zealand Grapevine Improvement Group (NZVIG), Wine Institute of New Zealand (WINZ), New Zealand Grape Growers Council (NZGGC), access to field days, seminars, promotional activities and publications and access to social activities.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Section 5.1.2 – Outdoor Burning Rule R1 – Outdoor Burning Rule R2 – Frost prevention devices	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<u>Rule R1 – Outdoor Burning:</u> Outdoor burning of vine clippings and associated organic material is an important part of vineyard management and ensures the spread of diseased material is prevented. <u>Rule R2 – Frost Prevention Devices:</u> The use of frost prevention heaters is one of the critical tools vineyard operators rely upon avoid frost damage to vines during the early stages of the vines annual development . The proposed permitted activity standards provide for the use of 'Return Stack Heaters', which include a chimney to minimise emissions. This represents what is considered to be good practice by the New Zealand Winegrowers Industry Guidance Note.
	I seek the following decision from WRC (give precise details): →	Retain these rules unchanged.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Section 5.1.13 – Ground-based and aerial applications Rule R36: Agrichemicals – permitted activity	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	WWGA supports the safe and responsible use of agrichemicals in both viticulture and other agricultural and horticultural land-uses. The proposed rule provides for the ongoing use of agrichemicals as a permitted activity providing certain standards are met. WWGA consider that in general, these permitted activity conditions are reasonable, but caution against duplicating functions that are already managed through other mechanisms. In particular, the repetition of the requirements of the specifics of NZS 8409:2004 Management of Agrichemicals in the rules. Condition (f) of Rule 36 requires that the discharge be

		conducted in accordance with <i>NZS 8409:2004 Management of Agrichemicals</i> . Therefore it is not necessary to repeat <i>NZS 8409:2004 Management of Agrichemicals</i> which is what Conditions (g) to (o) effectively do.
	I seek the following decision from WRC (give precise details): →	Delete Rule R36 conditions (g) to (o)

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<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p> <p>Section 5.1.13 – Ground-based and aerial applications</p> <p>Rule R36: Agrichemicals – permitted activity</p> <p>Exclusion of residential areas and hand/held knapsack applications</p>	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>WWGA supports the safe and responsible use of agrichemicals in both viticulture and other agricultural and horticultural land-uses.</p> <p>Rule 36 excludes residential areas and hand/held knapsack applications from the permitted activity of the discharge of agrichemicals into air or onto land where it may enter water. Therefore, as there is no rule permitting these discharges then under section 15(1) of the Resource Management Act 1991, a resource consent is required. WWGA do not believe that this was the intention of the Regional Council. Rather, that a separate permitted activity rule with appropriate conditions for residential areas and hand/held knapsack applications should be included in the Plan.</p>
	I seek the following decision from WRC (give precise details): →	Include a separate permitted activity rule with appropriate conditions for ground based and aerial applications of agrichemicals in residential areas and hand/held knapsack applications and any other consequential amendments to achieve the relief sought.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p> <p>Section 5.3.6 – Fertilizer and Animal Effluent</p> <p>Rule R85: Application of compost to land - permitted activity</p> <p>Rule R86 – Application of compost to land - restricted discretionary activity</p>	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>The proposed Rule 85 provides for the discharge of compost to land as a permitted activity subject to conditions. Proposed Rule 86 applies to the application of compost to land where the conditions in Rule 85 have not been met as restricted discretionary activity.</p> <p>WWGA supports this rule.</p>
	I seek the following decision from WRC (give precise details): →	Retain these rules unchanged.

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<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p>	<p>My submission on this provision is: →</p>	<p><input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended</p>
<p>Section 5.3.6 – Fertilizer and Animal Effluent</p> <p>Rule R85: Application of compost to land - permitted activity</p> <p>Rule R86 – Application of compost to land - restricted discretionary activity</p> <p>Section 5.3.9 – All other discharges Rule 93: All other discharges to land – discretionary activity</p>	<p>Reasons for my submission: →</p>	<p>The proposed Rule 85 provides for the discharge of compost to land as a permitted activity subject to conditions. Proposed Rule 86 applies to the application of compost to land where the conditions in Rule 85 have not been met as restricted discretionary activity.</p> <p>There is no rule that provides for the discharge winery wastewater system sludge to land as a permitted activity and therefore this activity would default to Rule 93 as a discretionary activity.</p> <p>WWGA consider that that the application of winery wastewater system sludge to land has less minor adverse effects due to the minimal volume and characteristics of the sludge. As such a new Rule providing for the discharge of winery waster system sludge to land subject to appropriate conditions, should be added to the Plan.</p>
	<p>I seek the following decision from WRC (give precise details): →</p>	<p>Insert a new Rule providing for the discharge of winery wastewater system sludge to land subject to appropriate conditions as a permitted activity.</p>

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<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p>	<p>My submission on this provision is: →</p>	<p><input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended</p>
<p>Section 5.3.4 – Treated Wastewater</p> <p>Rule R80: Discharge of Treated Wastewater</p>	<p>Reasons for my submission: →</p>	<p>The proposed Rule R80 is likely to capture most, if not all, winery wastewater disposal operations and appears to include them in the same grouping as human wastewater.</p> <p>WWGA consider that this grouping is not appropriate and that a separate provision for winery wastewater discharges to land as a permitted activity should be provided in the Plan.</p> <p>Winery wastewater has different characteristics to that of other industrial and trade waste discharges and providing the system is appropriately designed, will have no more than minor adverse effects on soil and ground-water quality. Many wineries are accredited under Sustainable Winegrowing New Zealand (SWNZ) and Organic Winegrowers New Zealand (OWNZ) which encourage discharge of winery wastewater to land. In addition the volume and composition of the discharge is different in the Wairarapa, compared to other parts of the country.</p> <p>WWGA consider that winery wastewater discharges should be permitted activities, subject to appropriate conditions.</p>

		Applications that fail to meet the conditions should be controlled activities with the default activity status being restricted discretionary.
	I seek the following decision from WRC (give precise details): ¶	<p>The addition of the following rules:</p> <p>Rule R80A – Viticulture and Horticulture Liquid Wastes: The discharge of treated wastewater from the processing of fruit and vegetables (including viticulture activities) is a permitted activity provided the appropriate conditions are met (e.g. BOD₅ limit, application rate limit, separation from surface water bodies, etc).</p> <p>Rule 80B - Viticulture and Horticulture Liquid Wastes: The discharge of treated wastewater from the processing of fruit and vegetables (including viticulture activities) that does not meet the conditions of Rule R80A is a controlled activity provided the appropriate conditions are met (e.g. BOD₅ limit, application rate limit, separation from surface water bodies, etc) and matters of control formulated.</p> <p>Notification: In respect of Rule 80B, applications are precluded from public notification (unless special circumstances apply).</p> <p>Rule 80C - Viticulture and Horticulture Liquid Wastes: The discharge of treated wastewater from the processing of fruit and vegetables (including viticulture activities) that does not meet the conditions of Rule R80B is a restricted discretionary activity provided the appropriate conditions are met (e.g. BOD₅ limit, application rate limit, separation from surface water bodies, etc) and specified matters to which Council have restricted their discretion are formulated.</p> <p>Notification: In respect of Rule 80C, applications are precluded from public notification (unless special circumstances apply).</p> <p>And any other consequential amendments necessary to achieve the relief sought.</p>

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p> <p>Section 5.3.8 – Refuse, Silage and Compost</p> <p>Rule R90 – Manufacture and storage of silage and compost</p>	<p>My submission on this provision is: →</p> <p>Reasons for my submission: →</p>	<p><input type="checkbox"/> I support the provision</p> <p><input checked="" type="checkbox"/> I oppose the provision</p> <p><input checked="" type="checkbox"/> I wish to have the specific provision amended</p> <p>As a by-product of the winemaking process, wineries and vineyards produce a significant volume of residual organic material. While there are multiple options to disposing of this material, composting this material and returning it to the land in the form of compost, is one of the most common (and sustainable) methods.</p> <p>The proposed permitted activity conditions require, amongst other things, that the discharge does not contain any hazardous substances. WWGA considers that the residual solid waste from</p>
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		<p>the wine making process is not a hazardous substance due to its specific characteristics.</p> <p>In addition, the condition(c) regarding stormwater entering the manufacturing or storage area – it is assumed that this does not refer to rainfall, but rather on-ground stormwater runoff. WWGA note that it is unusual for wineries/vineyards compost areas to be roofed due to cost and practicality issues. This condition could be clarified by adding the term "runoff" following the word 'stormwater'.</p> <p>Condition (d) only refers to "silage" storage areas and not compost storage areas. WWGA assume that this differentiation is intentional and notes the cost and practicality issues should it be proposed for compost storage areas.</p>
	<p>I seek the following decision from WRC (give precise details): →</p>	<p>Amend Rule 90 as follows:</p> <p>Rule R90: Manufacture and storage of silage and compost – permitted activity</p> <p style="padding-left: 40px;">(c) <i>stormwater runoff is prevented from entering into the manufacture or storage area, and</i></p> <p>Retain unchanged</p> <p>Rule R90: Manufacture and storage of silage and compost – permitted activity</p> <p style="padding-left: 40px;">(d) <i>the walls and floor of a silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and..</i></p>

Attendance and wish to be heard at hearing(s)

- I/We do wish to be heard in support of my/our submission
[Note: This means that you wish to speak in support of your submission at the hearing(s).]
- I/We do not wish to be heard in support of my/our submission
[Note: This means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature: 

Date: 25 September 2015

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

