

INFORMATION FOR MAKING A SUBMISSION ON THE PROPOSED FONTERRA MILK POWDER FACTORY AT DARFIELD

Environment Canterbury (ECan) and Selwyn District Council (SDC) have publicly notified applications for the proposed Fonterra Co-operative Group Ltd (Fonterra) milk powder factory at Darfield. You will need to fill out two submission forms:

1. to the SDC applications (Form 13) which relate to the construction, operation and maintenance of a milk powder factory.
2. to the ECan applications which relate to the discharge of contaminants to air and discharge of wastewater to land, and to use land to store contaminants.

Use the attached forms or collect a hard copy form from Ecan and SDC. You can submit online from the Ecan website.

The last day for filing submissions is 5pm on Friday 27 August 2010.

Anyone can make a submission!

You do not have to be an expert. You do not need to know all the technical detail. You and your family should state your concerns about the proposal.

What information must you include in a submission?

- The consent applications you are submitting on (the attached submission forms already include these details).
- Whether you support or oppose the consent applications.
- The reasons for your submission (you can attach separate pages with further details if required).
- The decision you wish the consent authority to make (e.g. Decline all applications).
- Whether you wish to be heard in support of your submission. (Presenting your submission orally can be much more persuasive than a written submission on its own. At the hearing you are limited to expanding on the scope of your original submission. You can always change your mind later about speaking to your submission).
- Add your name, address and telephone number
- Sign and date the submission.

Reasons for making submission

This section is important. It allows you to summarise why you support or oppose the proposal. It is difficult to raise issues later so think carefully about all the possible issues and write the reasons for your submission in your own words. You can be general at this stage and provide more detail at the time of the hearing.

For more information on the applications click onto the SDC website:

<http://www.selwyn.govt.nz/services/planning/resource-consents/current-rc-notifications/fonterra-dairy-factory-at-darfield/fonterra-dairy-factory-resource-consent> or

Ecan website: <http://www.ecan.govt.nz/news-and-notice/notices/Pages/default.aspx>

Following are a few of the issues you may wish to include in your submissions:

TO SELWYN DISTRICT COUNCIL

- What will be the landscape and visual effects of turning 12 ha. of rural land into a milk processing factory? Its 50 metre high dryer and 60 metre high boiler chimney stack will interrupt views of the mountains from Darfield and SH 73 and elsewhere. The proposed pine and cypress shelterbelts will not hide the factory and have no habitat or biodiversity value.
- State Highway 73 to the West Coast is a premier scenic tourist route. How will the factory 600m from the highway affect tourism in the area?
- Seventeen milk tankers per day would operate out of the site generating approx. 200 tanker movements per day. Additional heavy vehicles, staff and visitor vehicles will result in 460 vehicle movements per day. (p58 AEE). What are the noise, safety and traffic effects from so many heavy truck and traffic movements day and night ?
- The plant would operate 24/7 during the 10 month season from August to June. What are the noise effects from day and night operation in a currently peaceful area ?
- Coal may be offloaded from the nearby Midland Line Railway. What about noise from the additional shunting and movement of railway wagons?
- Industrial lighting will cause light pollution and glare in a currently dark night sky.
- The factory would process up to 2.2 million litres of milk daily and encourage further dairying expansion in mid and north Canterbury. With no separate land use consents needed to convert dry land properties to dairying, the effects of such intensification should be considered as part of the factory applications. Comment on whether these effects are acceptable.
- Describe your concerns about the impacts of changing land use on rural landscapes and amenity e.g. plantations cut down, hedges and shelter trees removed, the creation of a dairy pasture monoculture, the loss of shrublands.
- Comment on whether the proliferation of pivot irrigators, dairy sheds and milk factories is industrialising the landscape.
- Are the social effects of increased dairying acceptable given the transience and mobility of many dairy farm owners and workers?
- The plant would require an average of 300 workers on site during the 18 month construction period. The social impacts of this temporary increase in demand for accommodation, community and social services have not been assessed.
- Factory and dairying intensification are likely to mean more tankers on district roads causing substantially more wear which ratepayers have to maintain.
- Should the rights of the wider community, individuals and local businesses such as heritage accommodation who will be adversely affected by the factory, be put before big business?

TO ENVIRONMENT CANTERBURY

- The factory involves a 16 tonne per hour milk powder dryer and a 30 megawatt coal or wood boiler with two chimney stacks discharging particulates, sulphur

dioxide and nitrogen oxides, all major pollutants. News Reports indicate that using coal at Darfield might push Fonterra's annual coal use over 500,000 tonnes, mostly at factories at Edendale in Southland and Clandeboye in South Canterbury.

- There has been a major effort to improve air quality in Christchurch and towns around the region. Why is Darfield being targeted for a huge air pollution load and the health and amenity effects of burning so much coal or wood? What about CO2 emissions? Why is Fonterra contributing to climate change by being such a major user of coal?
- What will be the effects on Darfield and the surrounding landscapes from particulate drift and sulphur dioxide emissions? Will dust be an issue?
- The \$140 million capital investment required for the factory would commit Fonterra to expanding dairying and milk supply throughout Canterbury. This risks significant pollution of aquifers and streams, particularly through more faecal contamination and nutrient leaching. The effects of the increased dairying intensification are not assessed. Nor are the human health effects from degraded water quality. They should be.
- The company wants to discharge treated wastewater by spray irrigation on 503 ha. of farmland around the factory. This risks increased nitrate-nitrogen leaching to groundwater.
- Darfield is the largest township in New Zealand with no sewage treatment plant. There is inadequate information on the cumulative effects on groundwater quality of the septic tank discharges from the township, of nitrogen and other contaminant leaching from the factory wastewater discharges, and continued stock grazing in the discharge area. Fonterra is freeloading on the environment.
- Spray irrigation of wastewater potentially affects groundwater drainage and levels down gradient of the irrigated area, changes soil quality (eg by elevating sodium levels), and can cause spray drift and odour problems from milk waste.
- It's unclear how much water is required for the milk processing factory and whether new water takes will be required. Fonterra says existing takes from groundwater wells on the site are sufficient but the factory is in the Selwyn-Waimakariri groundwater zone which is classed as a Red Zone and at the limit of allocation.
- During summer wastewater should provide an alternative source of irrigation water for the 503 ha. Will this reduce current groundwater abstraction for irrigation on the existing farm properties and will this water be left in the aquifer?
- Last year Fonterra loaned Central Plains Water Ltd (CPW) \$2 million for CPW to complete the resource consent process. Is the factory dependent on CPW water from the adjoining headrace canal and CPW winning all of the Environment Court appeals against its scheme?

Send your submissions by **5 PM FRIDAY 27 AUGUST 2010** to:

1. Selwyn District Council, PO Box 90, Rolleston. Attn Helen Allison
2. Consents Operation Section, Environment Canterbury, PO Box 345, Christchurch 8140 or email to: info@ecan.govt.nz
3. Send a copy of your submissions to the applicant: Fonterra Ltd, C/- Planit Associates, PO Box 1845, ChCh 8140. Attn Mr Dean Chrystal