From: "Suzanne O'Rourke" <suzanne.orourke@fonterra.com>
Sent: Wed, 2 Sep 2026 15:51:17 +1200
To: "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
Subject: South Waikato District Council Plan Change 4 - Fonterra Submission
Attachments: PC4 - Fonterra submission (FINAL) (20260902).pdf

Afternoon,

Please see attached Fonterra's submission on South Waikato District Council Plan Change 4.

Can you advise the submission has been received by Council?

Thanks.

Suzanne O'Rourke
National Environmental Policy Manager, Water & Environment

Fonterra Co-operative Group Limited

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FONTERRA LIMITED

SUBMISSION ON SOUTH WAIKATO DISTRICT PROPOSED PLAN CHANGE 4

To:	South Waikato District Council submissions@southwaikato.govt.nz
Submitter	Fonterra Limited
Contact:	Suzanne O'Rourke, National Environmental Policy Manager
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I confirm that I am authorised on behalf of Fonterra Limited (**Fonterra**) to make this submission.

Fonterra could not gain an advantage in trade competition through this submission.

Fonterra may wish to be heard in support of the submission.

If others are making a similar submission, Fonterra will consider presenting a joint case with them at a hearing.

1. Introduction

1.1. This submission responds to Proposed Plan Change 4 (**Plan Change 4)** to the South Waikato District Plan in terms of the interests of Fonterra Limited (**Fonterra**).

2. Background

2.1. Fonterra is a global leader in dairy nutrition and is the preferred supplier of dairy ingredients to many of the world's leading food companies. Fonterra is New Zealand's largest company, and a significant employer, with more than 12,000 New Zealand-based staff and 5,800 employees based overseas.

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2.2. Fonterra owns 24 dairy manufacturing sites in New Zealand and four logistic/distribution sites in New Zealand. The operation of the existing dairy factory facilities is an integral part of the Fonterra business and essential for maintaining the success of the company internationally.

2.3. Fonterra's dairy manufacturing operations in the Waikato region, together with the efforts of Fonterra's supplying farmers, contributes about $2.7 billion to the Waikato region's gross domestic product (GDP), which equates to 9.1% of the region's GDP, and accounts for 4.8% of the region's total jobs. Fonterra's manufacturing activities are therefore a significant contributor to both local and wider regional economies.

2.4. Fonterra has significant assets and operations interests in the South Waikato District. These include:

a. Tīrau manufacturing site (**Tīrau Site**), located on Okoroire Road in Tīrau township, and;

b. Lichfield manufacturing site (**Lichfield Site**), located adjacent to State Highway 1, approximately 10 kilometres south of Putāruru.

Tīrau Site

2.5. The Tīrau Site was established in 1933, originally as a butter manufacturing plant for the domestic market, before being repurposed as a casein and ethanol manufacturing plant in the early 1980's. In 2022 Fonterra discontinued the ethanol plant, investing approximately $40 million to convert it to a lactose production plant. The site currently produces casein, lactalbumin, and lactose concentrate. During peak milking season the plant processes up to 1.4 million litres of milk per day and has on-site storage capacity of 3,220 metric tonnes.

2.6. The Tīrau Site recently had its wastewater treatment plant upgraded, with an investment of approximately $51 million to establish one of the largest industrial wastewater treatment plants in the Southern Hemisphere (in terms of treatment capacity).

2.7. The Tīrau Site employs more than 80 people and is actively involved in the local community, supporting activities and events such as school visits. The site regularly contributes to local environmental initiatives including Oraka stream support, tree planting days, and rubbish tidy ups.

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Lichfield Site

2.8. The Lichfield Site was established in 1995 and employs more than 230 people. The site manufactures a range of products including whole milk powder for the Global Dairy Trade, together with whey protein concentrate (**WPC**) and whey protein isolate (**WPI**) for use in medical and nutritional products. During peak milking season, the Lichfield Site processes up to 8 million litres of milk per day. Products from the site are distributed to more than 25 global markets.

2.9. As part of the larger milk collection team for the Reporoa manufacturing site, the Lichfield Site has 10 milk tankers based on-site. The site also has a large capacity for product storage, including 18,000 metric tonnes of cool storage, 40,000 metric tonnes of dry storage for whole milk powder, and 100 metric tonnes of dry storage for WPC and WPI.

2.10. In 2016, Fonterra underwent expansion of the Lichfield Site which included investing $360 million for the installation of New Zealand's most efficient milk powder spray dryer. The dryer is the joint-largest milk powder dryer in the world (a feature shared with the dryer at Fonterra's Darfield manufacturing site).

3. Planning Framework

3.1. The Operative South Waikato District Plan (**District Plan**) recognises the local and regional significance of the Tīrau and Lichfield Sites (**the Sites**). The District Plan's existing provisions refer to the Sites' significance in both the '*Zone Statement*' and in various '*Objectives and Policies*'. The Sites are both zoned *Industrial* and activities which are undertaken as part of Fonterra's operations are provided for as *permitted activities* in the zone. The Sites are also subject to a site-specific noise rule based on their noise control boundaries with the rule, requiring that noise from both Sites shall not exceed 45dB $L_{Aeq(15\ minutes)}$ when measured at the noise control boundary.

3.2. The District Plan provisions recognise the economic significance of the Tīrau and Lichfield Sites via a comprehensive planning framework that enables the ongoing protection, operation, and development of these regionally significant facilities. The ability of Fonterra to adapt to changing circumstances and pursue development opportunities relies heavily on the continuation of a supportive statutory planning framework.

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4. Fonterra Comments on Proposed Plan Change 4

4.1. Fonterra **supports** Plan Change 4 in its entirety. In particular, it supports the following proposed growth areas for Tīrau including:

a. Locating a proposed Future Industrial Zone north of the Tīrau township along State Highway 27, and;

b. Locating proposed new Growth Cells adjacent to existing residential areas and to the south of Tīrau township.

4.2. Fonterra also acknowledges that Plan Change 4 does not propose to increase residential density within the Tīrau Site noise control boundary (as previously proposed in the South Waikato District Growth Plan). Fonterra opposed such intensification as it had the potential to generate reverse sensitivity effects which could have constrained operations and future development at the Tīrau Site. Fonterra recognises the Council's response to this concern, and as a result is supportive of Plan Change 4 as it is currently notified.

5. Concluding Comments

5.1. Thank you for the opportunity to provide feedback on behalf of Fonterra in relation to Plan Change 4.

5.2. If you have any questions or require further information, please contact me.

Yours sincerely



Suzanne O'Rourke
National Environmental Policy Manager

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