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To: Bay of Plenty Regional Council
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Submission on: Proposed Plan Change 13 - Air Quality

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Submitter:

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Submission on: Proposed Plan Change 13 - Air Quality

1. Introduction

Agcarm welcomes the opportunity to comment on the discussion document Proposed Plan Change 13 - Air Quality.

2. Feedback

Agcarm's feedback is specific to the definition of a 'Low pressure boom'.

Definition of Terms – In relation to AQ R15 Agrichemical Spraying

Low pressure boom means any boom with the following design conditions:

- (a) the liquid pressure through the boom is less than 3 bar
- (b) the height of the discharge point on the boom is less than 1 metre from the ground
- (c) the nozzles point down
- (d) the nozzles are designed to create coarse droplets of greater than 250 microns in diameter.

Agcarm highlight that the majority of spraying contractor's ground application equipment would have the potential to exceed the outlined definition (see above, p. 8 of document) for a low pressure boom in one or more of the specifications. Hence, a low pressure boom would potentially need to operate under the same controls as an aerial application.

Agcarm submit that the definition needs to be reviewed, so that low pressure boom spray contractors can operate without having to meet the criteria for aerial application.

Explanation:

- The boom height for certain applications could easily be higher than 1m above the ground, but may not necessarily be more than 1m above the crop;
- The liquid pressure could potentially exceed 3 bars at times;
- The droplet size would be unlikely to always be greater than 250 microns in diameter. Most nozzles are rated with a volume mean diameter, and are not rated on a minimum droplet size, so there would not be many hydraulic nozzles that would not create some droplets less than 250um in diameter.

General Comment

Agcarm submit that section AQ R15 is too detailed, and that it would be more relevant to simply refer to the HSNO Act, label instructions and/or the New Zealand Standard Management of Agrichemicals NZS 8409:2004 when it comes to managing the application of Agrichemicals.

This would result in the deletion of the majority of Section AQ R15.

3. About Agcarm

Agcarm is the industry association for manufacturers and suppliers of crop protection and animal health products. For further information and a full list of members, see www.agcarm.co.nz.

Agcarm member products protect public health, improve animal welfare and help environmental management. They:

- Play a pivotal role in growing high yield, sustainable food and fibre products;
- Help supply healthy, nutritional and affordable food;
- Keep New Zealand's agriculture, horticulture and forestry sectors internationally competitive.

Our members are committed to safety, innovation and product stewardship.