

This is a submission on Proposed Plan Change 13 (Air Quality)
To the Regional Natural Resources Plan

I could not gain an advantage in trade through this submission.

I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment.

The details of my submission are attached

I do not wish to be heard in support of my submission

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AQ P3 Management of discharges

(a) () (c) (d) excellent.

(e) should also include, at the end of sentence amenity values, delete the word or

Then add the following , **the environment ,or be completely unacceptable practice to the owners/occupiers of.**

AQ P8 Agrichemical Spraying

(a) Avoiding spray drift beyond the boundary of the subject property and into water bodies. **Where possible** Remove the last two words where possible.

Put the onus onto the operator to avoid spraying beyond the boundary.

AQ R1 Rules

General Activities - Permitted

(a) Good

(b) Good

(c) Good

AQ R15 Agrichemical spraying - permitted

1 (a) good

(b) good

(c) good

2 (a) good

(b) good

(c) good

3 signage

Wherever public amenity areas are should also include the words **public space**

The rest of (a) is good

(b) once again include the words **public space**

The wording otherwise is good

(c) again include the words **public space**

People should also have this same protection wherever they wish to be so long as it is in a public space ie walking or cycling on a public road.

(4) Notification

Once again include the words **public space**

(a) (b) (c) (d) (e) are very good conditions.

(5) Spray Risk management Plan

(a) (b) (c) (d) are very good

Should include **(e) Buffer zones should be included for orchard sprayers of 10 meters when there is shelter be it natural or artificial , and 30 meters if there is no shelter.**

There are a few places when if an orchardist is spraying there spray will come all over the road, this is happening because there has been no effort be made to not have this happen. **If there is a close proximation too public spaces then onus should be on the orchardist too at least put up artificial shelter to minimise this.**

A lot of these chemicals are very toxic and can have a build up and terrible effect on persons.

If applicators have too keep their staff out of the sprayed area for a while then at the very least they should not be allowed to have their spray enter public areas

There are have been plenty of of examples when in the past acceptable amounts of sprays Have since been proven to be very bad for your health and the environment ie Dioxins , Azinphos methyl ,organochlorines,organophosphates, arsenic to say just a few, so too say because it meets the safe standards for humans on today's standards then a much less should be allowed to drift off the spray site.

And the onus should be completely on the operator to prove they are safe applicators not on any complainant that has toxic or unwanted substances put on them or their property. It is not acceptable for neighbours too spray or apply contaminants of any sort over the boundary .

And this is how all regulations should be set.

Definitions of terms.

Noxious or Dangerous

(b) Contamination of water supplies where the level exceeds the safe level for human consumption .

This level should be reset to zero ,nobody should be allowed too contaminated other persons water to any degree.

(c) Exceedance of a maximum residue limit for an agrichemical on ,or in food or stock feed at harvest or slaughter.

This is just not acceptable you just don't want it on your property.

.(e) Damage to crops or plants where contaminants have affected the growth or quality of the crop that levels exceed safe levels for human consumption and/ or the market value of the crop is reduced.

This level is set way too high. Should be able to go about your legal business without being concerned at all that spray from over the fence could be contaminating your crops.

(f) A discharge of fertilizer or agrichemical spray that compromises the organic status of another property.

Whilst this is a good rule it should also apply to any property that is not owned by the applicator

Public Amenity Areas means any public area where etc

This should also include the words **Public Space** .ie lots of roadways are used for walking cycling and deserve the same rights not to be put at risk of any sprays or contaminants.