



**BAY OF PLENTY  
REGIONAL COUNCIL  
TOI MOANA**

## Submission Form

Send your submission to reach us by 4.00 pm on Wednesday, 18 April 2018

Submission Number  
*Office use only*

024

<b>Post:</b> The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatane 3158	<b>or Fax:</b> 0800 884 882	<b>or email:</b> air@boprc.govt.nz
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**Submitter Name:**

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

~~I **cannot**~~ could not gain an advantage in trade competition through this submission. *[Delete as required]*

(a) I am/~~am not~~ directly affected by an effect of the subject matter of the submission that adversely affects the environment, and

(b) ~~My submission does/does not relate to trade competition or the effects of trade competition.~~  
*[Delete the entire paragraph if you could not gain an advantage in trade competition through this submission.]*

- The details of my submission are in the attached table. ✓
- I ~~wish~~ do not wish to be heard in support of my submission. *[Delete as required]*
- If others ~~make~~ make a similar submission, I will consider presenting a joint case with them at a hearing. *[Delete if you would not consider presenting a joint case.]*

*[Signature of petitioner making submission or person authorised to sign on behalf of person making submission.]*

*[NOTE: A signature is not required if you make your submission by electronic means.]*

9/4/18  
Date

**Address for Service of Submitter:**

409 TAMES COAST RD, KDS, Te Puv 3575

**Telephone:**

Daytime: 021 1346890

After Hours: 021 1346890

**Email:**

victoria.ross@spray.nz

Fax:

BOPRC ID: A2802144

Contact person: Victoria Smith (Director Seespray Ltd)  
 409 Thames Coast Road  
 Te Puru 3575  
 021 134 6890  
 victoria@seespray.nz

**SUBMISSION POINTS:**

Page No.	Reference	Support/Oppose	Decision Sought	Reasoning
10	AQ R15 (4) The new 24 hour notice period before spraying changed from no less than 12 hours before spraying commences.	Oppose	AQ R15 (4) The 24 hour notice period for spraying to remain at no less than 12 hours before spraying commences. Not the proposed 24 hours.	<p>We strongly believe it to be unachievable to give no less than 24 hours notice. As a result, spray contractors will have less accurate time frames of spraying and therefore have a negative impact on the notification process for both parties.</p> <p>Having a 12 hour notice period gives sprayers a tighter window to provide more accurate indication of when spraying will ACTUALLY occur. Creating more accurate workflows and timely notifications. Anything outside of that will create cutting of corners and excessive notifications which will give notifications a spam like nature and deem them useless.</p> <p><b>Insights that back this submission:</b></p> <p>Our company Seespray provide a spray notification software that a large number of spray contractors use within the Bay of Plenty. We believe we have the knowledge and insights in this arena to back this.</p>

				<p><b>Our business:</b></p> <ul style="list-style-type: none"><li>• 880 Avocado, Kiwifruit, Berry and Fig orchards using Seespray.</li><li>• 95% in the BOP region.</li><li>• We notify over 5,000 Staff, neighbours and owners, 365 days a year.</li><li>• To date we have notified 15,000 spraying jobs to the BOP community.</li><li>• That's over 100,000 TXT, phone call and email spray notifications since our launch in 2015!</li></ul> <p><b>Our clients are a mixture of:</b></p> <ul style="list-style-type: none"><li>• Management companies with outsourced spray contractors.</li><li>• Spray contractors that perform spraying and other orchard maintenance.</li><li>• Private small growers with outsourced spray contractors.</li><li>• Management companies with inhouse sprayers.</li></ul> <p>Our company objective is to build tools that are simple to use and "Better for both sides of the fence". Sprayers and those neighbouring spray zones. That's what we do, we encourage safer spraying, help implement regulations, contribute to developing more considerate attitudes, resulting in a more positive grower/community rapport so neighbours can love where they live and sprayers can get on with business.</p>
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				<p>When we first entered the market in 2015, we were hit with a number of issues and pushback. The biggest, which we still face resistance to was, having to have jobs booked in by 7pm the day before spraying. Largely because:</p> <ul style="list-style-type: none"><li>• Packhouses order jobs from spray contractors late in the evening.</li><li>• Staff returning late from the field and time restraints in getting jobs in on time.</li><li>• Last minute decisions based on weather influences.</li><li>• Last minute change of mind.</li></ul> <p>We had a few organisations, before using our system that would be consistently notifying neighbours at 10pm of spraying the prior day. This is just rude and totally unacceptable. We implemented the 7pm cut off so we could get all notifications delivered by 7:30pm, a respectable time, and so any shuffling of jobs due to unforeseen circumstances related to notifications could be dealt with.</p> <p>A large percentage of jobs that are booked are not completed on the day they are planned to be done, they may be rained off, wind might be too strong, have machinery breakdown a change of mind, just to name a few reasons.</p> <p>In light of this fluid workflow that sprayers adhere to, we had to develop a system that could help neighbours stay in the loop of any changes quickly and easily and with minimal interference to the sprayer as possible. "Better for both sides of the fence".</p>
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				<p>Currently with Seespray, sprayers can "cancel" or "reschedule" jobs and mass communicate those job updates to all notified parties. They can do the same with communicating when jobs are "completed" even advising the safe re-entry time based on the chemical applied and completion time/date, plus a whole heap of handy info, chemical info, pollution hotlines and more. Additional to that, if jobs are not completed within 48 hours of the scheduled date, Seespray recommends that the sprayer "re-notifies" the neighbours. This fits perfectly within your proposed 72 hour time frame. We already thought the 20 day window was far too long, so did our clients, so we proactively implemented this.</p> <p>If we continue working on improving the rapport within the community by sticking to what we are doing, because it's working well, we will continue to develop a more cooperative relationship between sprayers and neighbours and the no less than 12 hour rule will be sufficient.</p>
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BOPRC ID: A2802144



# Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan.

**Contact Person:** Victoria Smith  
409 Thames Coast Road  
Te Puru 3575  
021 134 6890  
victoria@seespray.nz

**Page No:** 10

**Reference:** AQ R15 (4)  
The new 24 hour notice period before spraying changed from no less than 12 hours before spraying commences.

**Stance:** Oppose

**Decision Sought:** AQ R15 (4)  
The 24 hour notice period for spraying to remain at no less than 12 hours before spraying commences. Not the proposed 24 hours.

**Reasoning:**

We strongly believe it to be unachievable to give no less than 24 hours notice. As a result, spray contractors will have less accurate time frames of spraying and therefore have a negative impact on the notification process for both parties.

Having a 12 hour notice period gives sprayers a tighter window to provide more accurate indication of when spraying will ACTUALLY occur. Creating more accurate workflows and timely notifications. Anything outside of that will create cutting of corners and excessive notifications which will give notifications a spam like nature and deem them useless.

**Insights that back this submission:**

Our company Seespray provide a spray notification software that a large number of spray contractors use within the Bay of Plenty. We believe we have the knowledge and insights in this arena to back this.

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- To date we have notified 15,000 spraying jobs to the BOP community.
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- Management companies with outsourced spray contractors.
- Spray contractors that perform spraying and other orchard maintenance.
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When we first entered the market in 2015, we were hit with a number of issues and pushback. The biggest, which we still face resistance to was, having to have jobs booked in by 7pm the day before spraying. Largely because:

- Packhouses order jobs from spray contractors late in the evening.
- Staff returning late from the field and time restraints in getting jobs in on time.
- Last minute decisions based on weather influences.
- Last minute change of mind.

We had a few organisations, before using our system that would be consistently notifying neighbours at 10pm of spraying the prior day. This is just rude and totally unacceptable. We implemented the 7pm cut off so we could get all notifications delivered by 7:30pm, a respectable time, and so any shuffling of jobs due to unforeseen circumstances related to notifications could be dealt with.



A large percentage of jobs that are booked are not completed on the day they are planned to be done, they may be rained off, wind might be too strong, have machinery breakdown a change of mind, just to name a few reasons.

In light of this fluid workflow that sprayers adhere to, we had to develop a system that could help neighbours stay in the loop of any changes quickly and easily and with minimal interference to the sprayer as possible. "Better for both sides of the fence".

Currently with Seespray, sprayers can "cancel" or "reschedule" jobs and mass communicate those job updates to all notified parties. They can do the same with communicating when jobs are "completed" even advising the safe re-entry time based on the chemical applied and completion time/date, plus a whole heap of handy info, chemical info, pollution hotlines and more. Additional to that, if jobs are not completed within 48 hours of the scheduled date, Seespray recommends that the sprayer "re-notifies" the neighbours. This fits perfectly within your proposed 72 hour time frame. We already thought the 20 day window was far too long, so did our clients, so we proactively implemented this.

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