



**BAY OF PLENTY
REGIONAL COUNCIL
TOI MOANA**

Submission Form

Submission Number
Office use only

004

Send your submission to reach us by **4.00 pm on Thursday 12 April 2018**

Post: The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	or Fax: 0800 884 882	or email: air@boprc.govt.nz
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Submitter Name: PF Olsen Ltd

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

- 1 I **could not** gain an advantage in trade competition through this submission.
 - (a) I am directly affected by an effect of the subject matter of the submission; and
 - (b) My submission **does not** relate to trade competition or the effects of trade competition.
- 2 The details of my submission are in the attached table.
- 3 I **wish** to be heard in support of my submission.
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing.

15 March 2018

Date

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

Address for Service of Submitter:

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SUBMISSION POINTS: PF Olsen Ltd

Page No	Reference <i>(e.g. Policy, Rule, Method or Objective number)</i>	Support/Oppose	Decision Sought Say what changes to the plan you would like	Give Reasons
Page 6	AQ R6	Oppose	Remove the reference to 'Forests and Rural Fires Act 1977'	This Act was repealed on 1-Jul-2017 by section 195(b) of the Fire and Emergency New Zealand Act 2017 (2017 No. 17)
Page 9	AQ R15 3e	Oppose	Remove the clause regarding the signage on vehicles associated with the operation.	<p>This could have a large additional cost to contractors who may have several vehicles associated with an operation, if they are required to have additional signage on both the front and rear of each vehicle.</p> <p>Additionally, extensive signage is already required all around the operational boundary, as well as notification of neighbours/other land users. For aerial operations the supporting vehicles should be parked close to the boundary signage, making the addition of the signage to vehicles redundant.</p>
Page 10	AQ R15 4ai	Oppose	Extend the notification period to match with previous plan (max. 20 days – min. 12 hours).	<p>This is a very large change in the notification time period from the previous plan (20 days to 12 hours). The greatly reduced notification period will be extremely difficult to comply with for several reasons.</p> <p>One reason is that aerial spraying is totally reliant on weather conditions being favourable which is difficult to predict meaning a larger window of opportunity to complete the spraying before having to re-notify is desirable – in our experience the vast majority of neighbours understand that we cannot give exact dates for aerial spraying and are comfortable with this.</p> <p>Additionally, we spray over 1,500 hectares in the BOP region at least twice a year requiring us to notify hundreds of neighbours spread across a large area. The neighbours change from year to year and between operations, this necessitates that a physical letter drop is sometimes the only practical way of notifying people.</p> <p>Very short notification periods due to weather, or other operational interruptions, could require repeated letter drops to the same addresses just to complete an operation in an area. It would become a fulltime job for someone to manage neighbour notifications during these operational periods if the shortened timeframe was to come into effect and significantly increase the risk of an unintentional breach.</p>