



**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

068

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: Ngati Ranginui Iwi Society Incorporated

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

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

- 1 (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.]
- 2 The details of my submission are in the attached table.
- 3 I wish/do not wish to be heard in support of my submission. *[Delete as required]*
- 4 If others 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.]*

16 April 2018

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

Date

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

Address for Service of Submitter:

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SUBMISSION POINTS

Page No	Reference – Issue, Policy, Objective, Method/Rule	Support / Oppose	Decision Sought	Reasons for Decision
1	AQ O1	Support	Maintain objective	The objective captures the importance of air quality in response to anthropogenic effects from discharges. The use of the word mauri captures the essence of life giving properties of air. The objective is supported by the Tauranga Moana Iwi Management Plan where the mauri is protected and where possible enhanced.
1	AQ O2	Support	Maintain objective	Ngāiti Ranginui support the objective in meeting the NES for Air Quality and Ambient Air Quality Guidelines. The NES sets a good standard for ambient air quality.
1	AQ O3	Support	Maintain objective	Understanding and assessing the adverse effects of contaminant discharges to air on human health, cultural values, amenity values and the environment is supported. Adverse effects are not just about effects on health or amenity.
1	AQ P1	Support	Maintain policy	Contaminants to air must avoid, remedy or mitigate any adverse effects of the discharge on human health, cultural values, amenity values and the environment. Ngāiti Ranginui are supportive of the policy where applicants need to demonstrate how adverse effects are avoided, remedies or mitigated.
1	AQ P2	Neutral	Maintain policy	Ngāiti Ranginui supports policies that avoid the discharge of hazardous substances into air. However, we are concerns about the potential harmful effects of spray drift from agricultural. The current management regime for hazardous substances leaves it to Regional Plans to manage. Ngāiti Ranginui support the stronger rule framework identified in this plan.
2	AQ P3	Oppose	Amend policy to read: AQ P3 Management of discharges — Te whakahaere i ngā tukunga	Ngāiti Ranginui oppose the policy where it minimises discharges beyond property boundaries where it may affect human health, cultural values, amenity values and the environment. Effects on neighbours should be avoided rather than just minimised. It's difficult to provide and objective standard to policy as it's written.
			Activities that discharge contaminants to air must be managed, including by use of the best practicable option, to:	

			(a) ... (e) minimise avoid the discharge of	
2	AQ P4	Support	Maintain policy	Ngāti Ranginui supports the policy for plan users to have particular regard to sensitive activities, gazetted airsheds, air quality values in Iwi Management Plans, cumulative effects, and new activities discharging into established sensitive activities. Ngāti Ranginui is concerned about spray drift in relation to residential housing, schools, marae and sports grounds
2	AQ P5	Support	Maintain policy	Ngāti Ranginui supports the policy on order to maintain cultural practices. Cultural activities include hangi for marae or other cultural functions.
3	AQ P8	Neutral	Maintain policy	Ngāti Ranginui support in principle but is concerned about the adverse effects of agricultural spraying on human health, particularly around sensitive receptors like educational facilities (schools, kohanga, pre-schools), residential properties (papakāinga, elderly and/or kaumātua housing), sports facilities, and marae.
3	AQ P9	Support	Maintain policy	Ngāti Ranginui support the policy that requires applicants to consider best practicable options for use of fumigants, and to have regard to the health of persons in sensitive activities from fumigant exposure.
4	AQ R1	Oppose	Amend to include: (d) The discharge demonstrates adequate setbacks from sensitive receptors	Ngāti Ranginui seek to ensure that the discharge of contaminants to air have adequate setbacks from sensitive receptors like educational facilities (schools, kohanga, pre-schools), residential properties (papakāinga, elderly and/or kaumātua housing), sports facilities, and marae. The suggested amendment is supported by the Tauranga Moana Iwi Management Plan Policy 24.2 c)
9	AQ R15	Oppose	Strengthen policy (b) Hand-held, motorised application methods or application methods using a low-pressure boom is a permitted activity provided conditions 3(e), 3(f), 3(d), 3(e), 4(e), 4(f), 4(e) are complied with. (e)(b) Any other application method ...	Ngāti Ranginui support the prescriptive nature of Rule 15. The Rule will support in managing any adverse effects on human health. However, Ngāti Ranginui seek for all agricultural application by a hand-held, mechanical methods to prepare and apply a spray risk management plan. A spray risk management regime should be a standard practice for the application of hand-held, motorised spraying. Signage, notification and the preparation of a risk management plan are supported.

14	AQ R20	Support	Maintain policy	<p>Ngāti Ranginui supports the Rule framework for methyl bromide, as it's a carbon depleting gas. The potential effects on human health also need to be adequately managed.</p> <p>As a discretionary activity or non-complying activity requires applicants to demonstrate how it meets the objectives and policies of the plan in managing effects.</p>