

The Chief Executive
Bay of Plenty Regional Council
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Submitter Name: Hamish Kendal

Submission on Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

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

The details of my submission are below.

I wish to be heard in support of my submission.

Hamish Kendal, 10th April 2018

Address for service of submitter:

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SUBMISSION:

1. I support the policy in AQ R15 as it is written allowing the use of drones for the aerial discharge of agrichemicals as a Permitted Activity within certain conditions, and where these can't be complied with then in compliance with the conditions of aerial application. I maintain that spraying from a drone within 5m of the target is closer to the application by ground techniques than to aerial techniques using larger aircraft. Therefore, I seek that an all-up weight (AUW) upper limit of drone-spraying aircraft is included in the policy, being 25kg which aligns with Civil Aviation Authority (CAA) RPAS Categories.
2. Our business Flightworks has a spray drone. The change in policy from the current air plan does not give our business any commercial advantage, as it makes the aerial application of agrichemicals by drones allowable on a more permitted basis, that other persons could do it more easily also. Certification with the Civil Aviation Authority is required for this activity which addresses the risks associated with the Permitted Activity status.
3. There may need to be some clarification in the plan, if warranted, about the aerial release of other hazardous chemicals in solid format (i.e. not sprays or agrichemicals) from drones. For example, the aerial release of cereal toxic baits for pest control (as performed by helicopters), or the release of fertilisers or hormones over orchards.

ENDS.