



**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

020

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: Hortforce Ltd (N.White/Director)

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 competition through this submission. [Delete as required]

- a)
- b)

[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 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.]*

____ Hortforce Ltd ____ N.White _____ 12.04.2018 _____

*[Signature of person 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.]*

Date

Address for service of submitter: 71a James Rd. Te Puna Tauranga 31767

Telephone: _____ **Daytime:** 021 548 544

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Fax: [Enter no.]

Email: info@hortforce.co.nz

BOPRC ID: A2802144

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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><i>As a spraying contractor we are responsible for spraying a large number of kiwifruit orchards and coordinating notifications to neighbours, orchard managers, orchard owners; some by txt others by phone call.</i></p> <p><i>A large percentage of our work is for management companies/Packhouses/private growers.</i></p> <p><i>Reasons why 12hr notification (current) works well is:</i></p> <ol style="list-style-type: none"> <i>1. Packhouses order jobs from spraying contractors later in the afternoon and into the evening.</i> <i>2. Field staff returning late and time restraints in getting jobs in on time</i> <i>3. Last minute decisions required based on weather conditions/changeable</i> <i>4. Last minute plan changes for various reasons</i> <i>5. Needing to see what weather conditions are going to be for next day.</i> <p><i>A large percentage of jobs are not completed on the day they are planned to be done, because:</i></p> <ol style="list-style-type: none"> <i>1. Machinery breakdown</i> <i>2. Change in weather/rain/wind/ground conditions</i> <i>3. Change of mind from orchard manager/orchard/owner</i> <p><i>Just to name a few.</i></p> 							

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