



**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

023

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: McNeil & Associates Ltd

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.

- a) I **am** directly affected by an effect of the subject matter of this submission that adversely affects the environment; and
- b) My submission **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** 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.

Shane McNeil

13/4/18

[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.]

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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><i>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.</i></p> <p><i>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</i></p> <p><i>With the introduction of PSA, timing of protective spraying is crucial to keep on top of the disease. For instance; once a pruning job is completed, a protective spray must be applied as soon as possible to protect wounds, especially before a weather event. This could not be achieved if the notice period was 24 hrs.</i></p>

				<p><i>During Harvest; (example) clearance on an orchard is received on a Monday morning, crop must be picked by Tuesday night (before Zespri cap comes down), a clean-up spray would not be applied in time due to having to give 24 hrs notice and consequently the crop would not get picked within the tight time frame. Therefore the Grower loses money and the pack house is unable to achieve their quota.</i></p>
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