

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

Clause 8 of Schedule 1, Resource Management Act 1991

Name: New Zealand Agrichemical Education Trust (NZAET)

This is a further submission in support of or opposition to a submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

1. I **do** wish to be heard in support of my further submission.
2. If others make a similar submission I **would** be prepared to consider presenting a joint case with them at any hearing.
3. I am *a person who has an interest in the proposal that is greater than the interest the general public has*. NZAET is a trust established by industry to promote the safe, responsible and effective use of agrichemicals. We administer a national agrichemical training and certification scheme (Growsafe) based on NZS8409:2004 Management of Agrichemicals.

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General Manager

Further submission points: PC 13 Rule 15 Agrichemical Spraying - Permitted

Submission Number	Submitter Name	Section Reference	Support/ Oppose	Reasons
52-1	Department of Conservation	AQ R15 Advice Note	Oppose	NZS8409:2004 Management of Agrichemicals should be used as a basis of the provisions in the plan, not just as an advice note.
73-5	New Zealand Kiwifruit Growers	AQ R15 Advice Note	Support	The submitter seeks that NZS8409 be elevated in the plan including a certification scheme for applicators.
11-12	Waikato Regional Council	AQ R15 new condition	Support	The submitter seeks that training requirements are included in Rule 15 for application of agrichemicals. Being adequately trained is important in ensuring that the potential for adverse effects of spraying are appropriately managed.
25-5	Spray Watchers Group	AQ R15 new condition	Support in part	NZAET offers a range of certificates under the Growsafe brand. All certificates have a five year expiry. All Council contractors (like other agrichemical users) should have a current Growsafe certificate at the appropriate level for the risk their spray activity poses and the responsibilities of their role.
58-44	Horticulture New Zealand	AQ R15 new condition	Support	The submitter seeks that training requirements are included in Rule 15 for application of agrichemicals. Being adequately trained is important in ensuring that the potential for adverse effects of spraying are appropriately managed.
32-2	Agcarm	AQ R15 whole rule	Support in part	The submitter seeks that NZS8409:2004 Management of Agrichemicals be used as a basis of the provisions in the plan which is supported as it sets out best practice for agrichemical use.
58-42	Horticulture New Zealand	AQ R15 (1)	Support	The submitter seeks that NZS8409:2004 Management of Agrichemicals is included as a general condition in AQ R15 (1). This is supported as it sets out best practice for agrichemical use.
73-1	New Zealand Kiwifruit Growers	AQ R15 (1)	Support	The submitter seeks that NZS8409 be specifically referenced in the plan.
7-11	Western Bay of Plenty District Council	AQ R15 (2)	Support	Removal of ambiguity
21-13	Jodie Bruning	AQ R15 (3)	Oppose	The submitter seeks standardisation of sign colour, size and wording based on US legislation. Changes are also sought to the length of time that signs remain, linked to EEL's. The current signage requirements are similar to the Operative Plan and it is unclear why there is a need to change the approach as sought. Public amenity areas are defined so it is clear what areas are included in the signage provisions.
58-43	Horticulture New Zealand	AQ R15 (3)	Support	The submitter seeks that signage on vehicles is limited to where the vehicles are in public places. This is supported so vehicles on private property are not

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				included in the provision. Requiring signage at entrance to private land is supported.
73-3	New Zealand Kiwifruit Growers	AQ R15 (3)	Support	The submitter seeks that the plan require signage at the entrance to private land and seeks specific wording that reflects best practice that growers undertake.
76-32	Federated Farmers of NZ	AQ R15 (3)	Support in part	The submitter seeks changes to the distances from public amenity areas where signage would be required. There needs to be a clear rationale for the required distance.
58-41	Horticulture New Zealand	AQ R15 (4)	Support	The submitter seeks that the notification clauses are amended to no later than 12 hours. This time change is supported as a minimum of 12 hours is supported because 24 hours is impractical and unworkable for those undertaking spraying.
11-13	Waikato Regional Council	AQ R15 (5)	Support	The submitter seeks that records are kept, such as a spray diary required by NZS8409:2004. Keeping records is best practice and is supported.