Environment Canterbury
Regional Council
Kaunihera Taiao ki Waitaha

Submission on Proposed Canterbury Land and Water Regional Plan

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Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 5 October 2012 to:
Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: JOHN GOLDEN SINCLAIR
Phone (Hm): 03 578 7110
Organisation*: NZ AGRICULTURAL AVIATION ASSOCIATION
Phone (Wk): 03 577 5679
* the organisation that this submission is made on behalf of
Postal Address: 121 AERODROME ROAD RD2 BLENHEIM
Phone (Cell): 027 314 2151
Postcode: 7272
Email: Sinclairjg@gmail.com
Fax:
Contact name and postal address for service of person making submission (if different from above):

Trade Competition

Pursuant to Clause 6 of Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

a) adversely affects the environment; and
b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

☑ I could not gain an advantage in trade competition through this submission; or
☐ I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

☐ I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
☐ I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Signature: [signature] **Date:** 26-09-12
(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

☐ I do not wish to be heard in support of my submission; or
☑ I do wish to be heard in support of my submission; and if so,
☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: *(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)*		(3) I seek the following decisions from Environment Canterbury: *(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)*
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
5-7	5.25 5a	SUPPORT IN PART	AMEND 5a TO REFLECT THAT AIRCARE™ ACCREDITATION IS HELD BY THE PILOT'S COMPANY - NOT THE PILOT	SEE NOTE ATTACHED
5 - 14	5.53 3.	SUPPORT IN PART	AMEND 3. TO REFLECT THAT AIRCARE™ ACCREDITATION IS HELD BY A COMPANY - NOT A PILOT.	

Add further pages as required – please initial any additional pages.

NZAAA
Aviation in Agriculture

P.O. Box 2096 Wellington 04 4722707 www.nzaaa.co.nz

Address for service:
121 Aerodrome Road
R.D. 2, Blenheim 7272

26th September 2012
Freepost 1201
The Proposed Canterbury Land & Water Regional Plan
Environment Canterbury
PO Box 345
Christchurch 8140

Submission in Partial Support of Proposed Canterbury Land & Water Regional Plan

The NZ Agricultural Aviation Association (NZAAA) supports in part the proposed requirements for the application of fertiliser and agrichemicals by aircraft as *permitted activity.*

Decision Sought: NZAAA seeks the following amendments:

5.25 5. Where the discharge is from an aircraft
(a) the discharge is to be carried out by a person who holds a GROWSAFE® Pilots' Agrichemical Rating Certificate and an aerial application organisation that is AIRCARE™ Accredited. The proposed rule currently says *or an AIRCARETM Accreditation*

5.53 3. the discharge is to be carried out by a person who holds a GROWSAFE® Pilots' Agrichemical Rating Certificate and an aerial application organisation that is AIRCARE™ Accredited The proposed rule currently says *or an AIRCARETM Accreditation*

Comment:

If water quality and wetlands are to be preserved it is essential that no discharges are made that could adversely affect them. Council is attempting to get this outcome in the above parts of the rule but is missing an opportunity to get assurance that aircraft are in fact not causing adverse effects. As it is written the rule assumes that by the pilot holding a GROWSAFE® Pilots' Agrichemical Rating Certificate, he/she will not cause agrichemicals and fertiliser to be placed in water or wetlands.

Whereas if the Rule requires the aerial application organisation (the company) to be AIRCARE™ Accredited then this would allow the Council to get an assurance that the pilots are always keeping agrichemicals and fertiliser out of water and wetlands.

The AIRCARE™ Programme achieves that level of assurance by having the following elements:

1) Pilots must be competent (in this context they must hold a GROWSAFE® Pilots Agrichemical Rating issued in accordance with Civil Aviation Rule Part 61)
2) The organisation must be able to demonstrate that its pilots operate in accordance with NZS8409:2004 (The GROWSAFE® Code of Practice) and the Spreadmark Aerial Code of Practice every time they go to work. To achieve this AIRCARE™ requires that organisations:
    - Have certified pattern testing of all dispersal equipment
    - Have all dispersal equipment calibrated
    - Be able to provide task verification
    - Run a Safety Management System (SMS) that is risk based
3) The programme is independently audited.

The AIRCARE™ Programme gives Regional Regulators the comfort that standards are not just understood by pilots, but are being met at all times.

Precedent:

The Auckland Unitary Draft Plan requires AIRCARE™ Accreditation as a condition of *permitted activity* to apply both agrichemicals and VTA by air.

NZAAA wishes to be heard in support of this submission.

Yours faithfully

John G. Sinclair
NZAAA Executive Officer