

From: [John Sinclair](#)
To: [Mailroom Mailbox](#)
Subject: Proposed Air Plan
Date: Wednesday, 8 July 2015 3:48:36 p.m.
Attachments: [ECAN Further Submission.docx](#)

Hi

Attached is a further submission on the CARP. A hard copy is being posted today.

Thank you.

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Further Submission on Proposed Canterbury Air Regional Plan

(Closing date: Friday 10 July 2015)

To: Environment Canterbury
PO Box 345
Christchurch 8140

Email: mailroom@ecan.govt.nz

Full Name of Further Submitter:
NZ Agricultural Aviation Association

Full Postal Address:
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Attn: John Sinclair

Telephone Number: 03 5775679
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NZAAA represents agricultural aviation operators in the Canterbury Region, so represents a relevant aspect of the public interest.

NZAAA is not a trade competitor and would not gain any advantage through this further submission.

I do wish to be heard in support of my submission

If others make a similar submission, I **would not** be prepared to consider preparing a joint case with them at any hearing.

.....
Signature of person making submission or person authorised to sign on behalf of person making submission.

Date: 10 July 2015

| Submitter Name | Submitter ID | Sub point ID | Plan Provision and decision requested by submitter | Support/ Oppose | Reason |
|------------------------|--------------|--------------|--|-----------------|---|
| Horticulture NZ | 63138 | pCARP-1081 | Amend Policy 6.25 as follows: <u>The discharge to air of agrichemicals and fertilisers is undertaken using best management practices to minimise the risk of adverse effects on non-target locations.</u> | Support | The focus of the policy is on use of best management practices and minimising adverse effects. |
| Ballance AgriNutrients | 63247 | pCARP-2218 | Amend Policy 6.25 The discharge to air of agrichemicals and fertilisers occurs only where appropriate management practices <u>including the application of industry best practices</u> are used to minimise the risk of affected non-target locations | Support in part | The use of industry best management practices is supported |
| Horticulture NZ | 63138 | pCARP-1082 | Amend Policy 6.26 as follows: Manage the discharges to air from rural activities to avoid or minimise potential for adverse effects beyond the boundary of the property of origin. | Support | The focus of the policy is on minimising adverse effects. |
| Horticulture NZ | 63138 | pCARP-1093 | Separate out application of fertiliser into a separate rule that requires: - compliance with the application provisions in the Code of Practice for Nutrient Management (Fertiliser Association) - is approved for use under the Fertiliser Group Standards under HSNO | Support | The effects of fertiliser and agrichemical applications are different so should be addressed in separate rules. The conditions in Rule 7.72 are not the most appropriate for fertilisers. |

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|----------------------------|---------------------|---------------------|--|------------------------|--|
| Ashburton District Council | 62940 | pCARP-912 | Insert a new rule following 7.72 to provide for small scale applications using hand held appliances by property owners with the provision that agrichemicals are to be use in accordance with manufacturer's directions. The new rule should only require applications consistent with NZS8409 :2009 certification if the applications are undertaken by a licensed operation. As in NRRP Rule AQL 70 the new rule should provide for the application of agrichemicals without nationally accredited qualifications by owners on roadsides adjacent to their property. | Oppose in part | Those applying agrichemicals in public places, such as roadsides, should be appropriately trained to ensure that the risk of adverse effects are minimised. |
| Meridian Energy | 53283 | pCARP - 2758 | Insert a new rule to apply to Pest control activities wider than rural activities as set out in the submission, including vertebrate toxic agents | Support in part | Provision for application of vertebrate toxic agents is supported but should also ensure that best practice is required for the application. |
| Horticulture NZ | 63138 | pCARP-109 | Amend Rule 7.72 for agrichemicals as set out in submission | Support | The provisions sought by Horticulture NZ are appropriate and represent best practice for applications of agrichemicals, including requirements for training and AIRCARE accreditation. |
| Ballance AgriNutrients | 63247 | pCARP-2284 | Amend Rule 7.74 (Restricted Discretionary Rule) to include fertilisers and adoption of industry best practice | Support in part | Application of fertiliser not meeting the permitted activity rule should be provided for as a restricted discretionary rule but it should be a separate rule from |

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| | | | | | agricultural as the matters of discretion are different to those for agricultural. |