

John Sinclair Executive Officer NZAAA .

Speak to Proposed Agrichemical Rules 7.72

Horticulture NZ has proposed some different conditions for PA and NZAAA supports these.

In the big picture what Hort NZ is promoting is adherence to Best Practice. NZAAA supports best practice and encourages members to abide by it – Hort NZ represents the major food producers in NZ and NZAAA represents an industry that applies 80m litres agrichemical mixes every year. Why do we support best practice? Because bad practice will see our activities terminated as has happened overseas. We cannot afford to go out of business and neither can NZ afford to lose these industries. 2014 \$4B. We firmly believe that our best survival strategy is to always operate to best practice.

I'd like to speak to just three of the conditions Hort NZ has promoted.

- 1) Training. Hort NZ promotes GROWSAFE Certification as evidence of robust training and John-Paul Pratt will speak to that shortly. Be clear that NZAAA supports GROWSAFE. For the past 24 years it has been highly effective in changing practices in our industry.
- 2) Notification. Hort NZ requires that notification takes place and NZAAA supports this responsibility sitting with the landowner as proposed by Hort NZ. Neighbours need to know what is going on. It's a courtesy. **95% of alleged spray drift claims are made by people who were not notified.** These claims are often vexatious (not always) but are always time consuming for regulators.
- 3) The final point I want to support is Hort NZ's proposal that aerial companies be accredited. Hort NZ has used our branded AIRCARE Accreditation Programme and we do have an accreditation called that. But what you might like to consider instead is requiring **that all aerial application companies have an independently audited QA Programme that measures compliance with NZS8409.**

This is important because there is an assumption that because a person is trained they will always follow that training.

Training IS important but all training does e.g. having a GROWSAFE Certificate, is show that a pilot **knows what to do.**

An accreditation programme that is independently audited and measures compliance with NZS8409 shows that a pilot **is doing it.**

The public is entitled that assurance and AIRCARE does provide that.

JP