## SPOKEN STATEMENT - David Gill

- 1. I am David Gill, a director and owner of Independent Chemical Consultancy Limited.
- 2. I have reviewed the agrichemicals being used by Environment Canterbury for their weed control within and near waterways and provided advice on their suitability.
- 3. They currently use glyphosate and triclopyr and in my opinion these products are the best available agrichemicals for the management of weeds as required by ECan and I recommend that any replacement consents authorise the use of both glyphosate and triclopyr.
- 4. Weeds that are actively growing are more likely to be impacted by herbicides, therefore spraying during the active growth phases is likely to achieve the best results. Another benefit of spraying weeds early in the growth season is to kill them before they have set seed. The growth season typically starts in Spring. I appreciate that the timing of ECan's spray programme is a balance of many competing factors and spring spraying is not always possible. I understand some spraying occurs during autumn when the plants will have less active growth and the new season growth will be hardening off. Due to that, glyphosate may no longer be a successful herbicide and triclopyr may be the best option.
- 5. ECan asked specifically about the availability of the amine formulation of triclopyr and earlier enquiries with the industry found that this product was not currently commercially available in New Zealand. In the last few days I have become aware of a potential option to pre-order bulk volumes of this agrichemical; however, I have not had the opportunity to confirm the feasibility of this option before this hearing.
- I investigated whether there were other new products that might be of interest, but found no other agrichemicals on the market that I would suggest as being better alternatives.
- 7. I recommend that ECan regularly review the agrichemicals being used with an agronomist and check whether new, improved options have become available.
- 8. I recommend that any replacement consents use the term "adjuvant" and not "surfactants". Adjuvants is a broader umbrella term that includes surfactants, oils, antifoaming agents, and drift retardants.
- Any use of agrichemicals should not exceed the manufacturers recommended application rates, should comply with all HSNO (Hazardous Substances and New Organisms Act 1996) approvals and the discharge should be in a manner that complies with the NZ Standard 8409.
- 10. The most economical way of controlling weeds is the application of herbicides.