BEFORE THE HEARINGS PANEL APPOINTED BY
CANTERBURY REGIONAL COUNCIL

UNDER	The Resource Management Act 1991 (RMA); and
IN THE MATTER	of an application by Canterbury Regional Council for resource consent to discharge agrichemicals to rivers and their connected waterbodies, air, and the coastal marine area, and the clearance of vegetation, for the purposes of weed management to provide flood, erosion, drainage and river enhancement works.

Summary Statement of Evidence of Nicolas Jon Ranger
On behalf of Canterbury Regional Council (applicant)
22 March 2024

SUMMARY STATEMENT

1. My evidence addresses a technical peer review I wrote that Wildlands provided to Canterbury Regional Council.

2. The technical peer review was principally related to agrichemical operational and management methods.

3. Recommendations on improving the operational integrity of the proposed operational and management methods were provided.

Key recommendations

4. Aligning the Agrichemical Strategic Management Plan (ASMP), and Operational Management Plans (OMP), so they are consistent, and work in unison.

5. Clarify which documents need to be finalised and operational 'prior' to any agrichemical application being undertaken. *The revised proposed Condition 5 (Appendix 1, Jolene Irvine's*

evidence) states the ASMP is to be prepared within six months of consent being granted. In the meantime, I assume works will be undertaken under the OMP, which under Condition 15 (ii) is required to meet the conditions of the ASMP (which may not be finalised).

6. Undertake further review/assessment of the practicalities of timing agrichemical application around the presence of bees and other pollinators. *This has been adequately addressed in the revised proposed Condition 25.*

7. Update conditions regarding notifications to include further recommendations. *These have been adequately addressed in proposed Conditions 12 and 17*.

8. Add the requirement for water sampling locations and timing to be determined and methods detailed in the ASMP and OMP. *Further to discussion over the past two days, it is my opinion that water sampling protocols need to be tailored to each site and the activity being undertaken – there is no one-size fits all. In my opinion, water sampling should be undertaken by a separate party to that undertaking the agrichemical application (to provide more integrity to the results). Assessing overspray or spray drift can also be undertaken by assessing control of any vegetation outside of the control area (a post-control audit)*.

9. Annual Spray Completion Reporting (proposed Condition 39): Add a requirement for a summary of all environmental, agrichemical spill, or non-target damage incidents, audits, and any actions that were taken, to be presented in the annual spray completion reporting.

10. In my opinion, a single Handbook for Spraying (rather than two separate, but similar handbooks, for Contractors and Council) for consistency in approach. *In my opinion, all work should have GPS tracklog data recorded for all spray operations (for improved integrity, as the operator knows this data is being recorded, and it also provides a good indication of where agrichemical application*

has taken place – within reason). The handbook also needs to be updated to include the final consent conditions.

11. Review the data captured on the Agrichemical Use Form (refer Section 5.12 of my evidence).

12. Revise the Hazardous Substance Spill Response Plan (HSSRP) documentation. *The HSSRP (proposed Conditions 36-38) and the Spray Handbook talk about prevention of spills. 'Prevention' is not a 'response' so suggest the wording and overall direction of these is adjusted appropriately*. As raised earlier this week in this Hearing, no timeframe is provided for when this HSSRP must be prepared by. Proposed Condition 38 refers to an 'excessive contaminant discharge' but does not define what volume is considered 'excessive', as this then triggers Condition 38(b) and (c) requirements.

Additional comments from last two days:

13. There has been much discussion on wind speed and spraying. Spraying application method, site conditions, and wind speed all need to be taken into account, as it is the combination of factors that result in spray drift, rather than simply wind speed, particularly if the spraying is not in a 'wide dispersive manner' (ground-based knapsack control). With regard to ground spraying operations, wind speeds can vary considerably between sites. I would also refer to the Growsafe website which details a practical implementation of wind speed monitoring when on site, based on characteristics of wind effects on vegetation at certain wind strengths, which is more appropriate than a specific wind measure at a certain point, at a set time.

14. The OMP (proposed Condition 15(vii)) requires a list of parties contacted re sensitive sites (Schedule 2), and (viii) requires the methods and measures to avoid or manage the effects of the agrichemical spraying to be detailed. However, I consider it imperative that a list, and map, of the Schedule 2 sensitive sites is

also presented in the OMP as this information is critical to the operator.

Conclusions

15. Overall, the application and the associated documents were comprehensive and well thought out, and clearly detailed the justification for the use of agrichemical control of weeds across Canterbury Regional Council's river and drainage network.

16. The operational methods and requirements for agrichemical spraying were generally well-considered, and in line with industry best practice, and will minimise negative impacts on the environment.

17. If the recommendations I made above are implemented, the operational integrity of the agrichemical control would be improved, providing additional assurances to stakeholders that best practice methods will be followed and any negative impacts are minimised.