

# Your submission to APP203974 - reassessment of hydrogen cyanamide

Submission no: 127771

Ref no: 76

MOP no: n/a

██████, Pākehā IWI - Scottish Clan (██████████)

478 No 4 Road Te Puke

BOP

New Zealand

Reference no: 76

## Clause

What is your position on the proposals set out in the reassessment application? Please outline your reasons in the text box below.

## Position

I oppose the application

## Notes

- I believe Hydrogen Cyanamide should still be made available, but under much tighter controls. - It must only be applied by approved operators with Low drift AI nozzles and the use of an approved drift retardant from a machine with a closed cab. Cab filters must be approved for HC and changed by an approved installer (by way of special course certificate) before each season starts and immediately after HC spraying is completed that season. HC must be loaded from a purpose built pumped trailer with a metered distribution nozzle and onboard trailer scales to verify correct mixing (approved by the director of EPA) - It should NOT be applied within 500m of any built up area which is also zoned residential or within 200m of houses, or buildings which are owned by third parties on rural zoned land that can't be evacuated for medical reasons (with written proof by a practicing doctor) for the duration of the spray application period plus/minus 2 hrs either side. It must NOT be applied within 500m of any private or public school with 50 or more students or within 200m of any school with 1 - 49 students. - HC should not be applied within 50m of a local road or 200M of a State Highway. Signs must be placed on local roads 500m upwind/downwind warning drivers to close windows and turn air vents off or onto recirculation if the operator chooses to apply HC between 200 - 50m from that local road. If there is no living shelter or mechanical shelter barrier along the edge of the local road, the applicator must keep more than 200m from the local road. - applicators must notify all neighbours in writing within 21 days - 5 days prior, again within 48 - 24 hours prior and finally within 2 hours of application both in writing by electronic form or by phone call or in person if they have no means of electronic communication. - Hicane should only be made available to those Hayward and Gold 3 kiwifruit orchards which receive less than a predetermined number of winter chilling hours, that criteria to be determined by a working group consisting of Zespri/KNZ/NZKGI/EPA and monitored by installation of site specific weather stations approved by the director of EPA. This criteria must not be ambiguous and it must show a demonstrated competency that it is reliable and which proves that orchards can generally achieve at least an average of 10,000 export trays per ha with that level of winter chilling. All new kiwifruit varieties since 2015 must demonstrate that they don't require HC before being commercially planted. Zespri red must not be allowed HC as it was only released recently when we knew HC was at greater risk of controls. - Zespri organic category must be made easier to enter and only have a 1yr stand down period (not 3yr as this has been a big deterrent to growers switching to organics) . Treated pinus radiata posts should be allowed to be used in organic orchards unless there is a commercially available alternative which is renewable and has less impact on the environment in the 50yr life with a similar or better lifespan as Treated pine (eg 50 yrs plus) - Zespri must fund trials into alternative budbreak enhancing sprays and methods over the next 5 years which are environmentally friendly. They must provide at least \$25m funding per year to trial programs approved by the director from shareholder profits. Government must match Zespri funding dollar for dollar over that period, so that we find safe alternatives quickly. The alternative is to release better commercially profitable gold and green varieties to existing Hayward and Gold 3 NZ growers for a nominal value, which is both resistant to PSA-V and which does not require HC.

## Clause

All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.

## Position

Yes I wish to speak about my submission at the hearing

## Notes

You have elected to withhold your personal details from publication.