

# Your submission to APP203974 - reassessment of hydrogen cyanamide

Submission no: 127780

Ref no: 87

MOP no: n/a

[REDACTED], **GwenGary Orchard** [REDACTED]

113 Snodgrass Rd,

Te Puna RD4

Tauranga 3174

Bay of Plenty

New Zealand

Ph: 07 552 5569

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**Reference no: 87**

## 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

Our orchard is in the Bay of Plenty region and we have 2.5 hectares of green/gold. We have been growing kiwifruit since 2009 and have been using hicane since then. We use hicane on our green/gold crop and use professional and fully certified spray contractors to spray hicane on our orchard. These are the Health & Safety measures taken on my orchard to protect worker exposure and minimise risks to the environment and to bystanders on my orchard. All neighbors are formally advised in advance of hicane spray. Signage is placed at the single orchard entry point and at the Block entrance. Applicator wears appropriate PPE, uses an enclosed-cab atom sprayer with AI nozzles and Drift Stop is added to the mix at label rates. Prior to hicane spraying the target blocks are mowed/mulched and bird-scaring measures are employed immediately before spraying in order to keep the block as free of birds as possible during the spraying itself. Once the spray is completed, no entry is permitted into the sprayed blocks for the full re-entry interval of at least 5 full days and this is strictly enforced. While one potential alternative to hicane is available for gold kiwifruit (I am discussing use of this alternative with our hicane spray contractor), to my knowledge no alternative exists for green kiwifruit at this time. The issue is complicated further by the fact that the hicane alternative (Advantage Gold) is currently only available in 200L barrels (an unexpected side-effect from efforts made to reduce agrichemical container waste across the industry). This means that unless other orchards co-operate with the joint purchase and application of Advantage Gold, we are not in a position to pursue this option at this time. The value/benefit to our orchard of using hicane is significant. In the 2017-2018 growing season we experimented with NOT applying the hi cane to our G3 block. This resulted in noticeable size variation which impacted our harvest results in the form of a greater-than-usual portion of size-rejected fruit at packout. This in turn reduced our overall Orchard Gate Returns by an estimated 5-10% over a typical seasonal return. We agree that the industry needs to develop alternatives to hicane and we would like to see this product phased out eventually, but before this happens an effective and viable alternative needs to be developed. Field trials alone can take a number of years to complete and overall research and development can take much longer. A five year window does not appear to be a feasible time frame to do this.

## 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

No I do not wish to speak about my submission at the hearing

## Notes

**You have elected to withhold your personal details from publication.**

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**GwenGary Orchard** ( )

113 Snodgrass Rd,

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Bay of Plenty

New Zealand

Ph: 07 552 5569

manager@gwengary.com

**Reference no: 88**

## **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**

Our family orchard is in the Bay of Plenty region and we have 2.5 hectares of green/gold. We have been growing kiwifruit since 2004 and have been using hicane since then. We use hicane on our green/gold crop and use a professional and fully certified spray contractor to spray hicane on our orchard. As far as I am aware, I have had no medical implications from using hicane. While one potential alternative to hicane is available for gold kiwifruit only (I am discussing use of this alternative with my hicane spray contractor at present), it's efficacy in the field has yet to be proven and to my knowledge no alternative exists for green kiwifruit at this time.

## **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**

No I do not wish to speak about my submission at the hearing

## **Notes**

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