

Submission no: 127801

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From: [REDACTED]
To: [Reassessments](#)
Subject: Submission on Hydrogen Cyanide Reassessment
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Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[2021_12_13_EPA_Hydrogen_Cyanamide_Reassessment.pdf](#)

Tēnā koe

Please find attached a submission on the Hydrogen Cyanide Reassessment from the Māori Trustee.

If you have any questions, please contact me on 027 222 7004, or by email. I am EA to the Māori Trustee.

Ngā mihi

[REDACTED]
[REDACTED]
[REDACTED]



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13 December 2021

Environmental Protection Authority
Email: reassessments@epa.govt.nz

Tēnā koe

Re: Submission on Hydrogen Cyanide Reassessment

The Māori Trustee is a statutory body with its core function being the administration of Māori land. As trustee or agent, the Māori Trustee administers approximately 1,800 Māori land trusts totalling around 88,000ha and services in excess of 100,000 individual Māori land owners.

The Māori Trustee administers a number of kiwifruit orchards on behalf of Māori land trusts but also has direct investments in 10 kiwifruit orchard developments on Māori land where the aim is to create economic returns for owners and whānau job growth. These orchard developments are on prime kiwifruit land which was previously leased to outsiders to grow low-returning maize crops. The investments have a long pay-back period due to the high cost of orchard development and are in warmer areas such as Te Kaha and Matakana Island where Hi-Cane is essential for crop performance.

A total ban of using Hi-Cane would devastate the Māori economy, especially in the prime growing areas of Bay of Plenty where some of the best performing orchards in NZ are located on Māori land. The potential negative impact is not just economic but would have severe social implications, job losses and a loss of mana to tangata whenua.

The Māori Trustee has reviewed the Seeka submission and supports it in its entirety. It has also reviewed the NZKGI submission and supports the thrust of that submission.

The Māori Trustee believes that an outright ban would be ruinous for many Māori and would severely restrict the ability of other Māori to obtain highest and best use of their land through conversion to horticulture. As both NZKGI and Seeka have made clear, there is no adequate alternative application to Hi-Cane available and the current and proposed mitigations and controls in Seeka's submission are, in my view, entirely sensible and workable.

Nāku noa, nā



Kaitiaki Māori | Māori Trustee