

Your submission to APP203974 - reassessment of hydrogen cyanamide

Submission no: 127807

Ref no: 118

MOP no: n/a

██████████, Tirohanga Fruit Company Limited (██████████)

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Reference no: 118

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

We are a large kiwifruit grower in the East Cape/Ōpōtiki region and our operation and the contribution we make to the local economy will be seriously affected if we are not able to use hydrogen cyanamide in the future. Please see attached paper with further details.

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

Supporting documents from your Submission

EPA_Submission_TFC.docx

Uploaded on 12/15/2021 at 04:51PM

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Submission to the EPA on Hydrogen Cyanamide on behalf of Tirohanga Fruit Company Ltd.

I would like to make a submission on behalf of Tirohanga Fruit Company Limited and its staff. I am the CEO of our family owned and operated medium sized business based in the small rural community of Ōpōtiki. My family have grown kiwifruit here for over 26 years.

The majority of our business is kiwifruit. We are part owners and managers of 16 orchards growing over 106 canopy hectares of both green and gold kiwifruit in the Ōpōtiki and East Cape regions (Ōmāio and Te Kaha). We employ over 120 people in our community and support our local businesses with our trade, bringing much needed revenue into our community. We supplied about 1.6 million trays of export kiwifruit this season, which makes us a large producer in the industry.

We do not support the EPA proposal to ban hydrogen cyanamide with a phase out period of five years for the following reasons:

Because of the warm climate of the region we grow our kiwifruit in, especially the mild winters, a ban on the use of hydrogen cyanamide will make most of our highly profitable SunGold orchards no longer economically viable to crop. The simple fact that we have mild winters means that this product does not just enhance our budbreak, it ensures our budbreak. Without it we would only get between 1/3 and 1/2 of our usual crop.

Anticipating the eventual loss or restriction of hydrogen cyanamide, we have, over the years, trialled alternative budbreak enhancers on some of our orchards. The results are that in our warmer coastal orchards (more than half of our total canopy hectares), there is no alternative that ensures a good bud break and an economically viable crop. Yields between 1/3 to 1/2 of our normal crop load means we would not be able to operate these orchards any longer if we lost the ability to use hydrogen cyanamide. On average our gold fruit produces anywhere between 16,000 -22,000 trays per hectare in a normal year. Trials with alternative bud breakers gave results of 6,000 -8,000 trays per hectare.

This unviable area includes the 41.6 hectares of Māori leased land that we have developed over the last 12 years in Te Kaha and Ōmāio, where we have a profit share agreement with the landowners whereby half of the profits are returned to them. This is a huge benefit to their small community and the loss of this income would be devastating for them. This financial year approximately \$2.5 million is going to their community and this is used for housing, education, looking after kaumatua and much more. We also provide both permanent and seasonal work for people in these communities, providing jobs which will no longer be there if we cannot operate the orchards.

We have used hydrogen cyanamide since 1995 without ill effects for us, our staff, or the environment on our orchards. We spray hydrogen cyanamide on all producing blocks of all our orchards once in the winter every year. This is done by our trained operators who follow best practice for the mixing and application of product. In addition to following best practice in line with Global GAP requirements, the following systems are used by our operators to mix and spray hydrogen cyanamide:

- We purchase 20L containers of Hi-Break, which eliminates the risk of decanting product and spillage.

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- The sprayers are fitted with a vacuum that sucks the product into the machine directly from the 20L containers, eliminating the risk to the operator of contamination on loading product. This process also allows for triple-rinsing the containers at the same time with no waste.
- We only mix complete container loads (multiples of 20L containers), no part containers, and all mixing is done in the machine with no risk to operator.

These are the Health & Safety measures taken on all our orchards to protect worker exposure and minimise risks to the environment and to bystanders:

- We only use self-propelled sprayers with sealed, filtered, airconditioned cabins for operators.
- PPE is worn in the form of masks, gloves and spray suits, as an extra precaution.
- AI nozzles and drift stop are used to minimise spray drift.
- We spray only in favourable conditions to further reduce chance of spray drift to any neighbours.
- We spray at low engine revs to reduce the fan speed, reducing drift.
- We have a process of annual health checks for all machinery operators to ensure we manage their risk.

There is both natural and artificial shelter within and around our orchards and this is kept in good condition. Gaps in natural shelter are re-planted as needed and artificial shelter is repaired as needed.

With regard to the claimed effect of hydrogen cyanamide on animal life in and around the orchard, we find that this cannot be true. We have very high levels of both bird and aquatic life on orchards that have been treated with hydrogen cyanamide for over 20 years. Bird activity is not common in the orchards during the winter dormancy period when hydrogen cyanamide is applied. There is no food source for them there at that time, and no sheltered canopy for them to nest in. In the Spring when we have budbreak there are such a high number of birds on many of our orchards that we spend a lot of time and money on managing the high bird pressure in the orchards, so that they don't eat the kiwifruit buds. We have also observed good aquatic life in the drains on our orchards, of which many are within five meters of where hydrogen cyanamide is sprayed. This includes eels and whitebait. Again, well managed applications of hydrogen cyanamide seems to have no effect on this aquatic life.

As the manager of a medium sized business, I am responsible to my staff and my community for their health and well-being. I take this obligation seriously and our company values mean that our people and our community always come first. Safe spray practices keep our staff and community safe. Every winter, ahead of Hi-Cane season, we actively engage with our neighbours to ensure they understand what is happening and what we do to protect them. As long as this product is used appropriately, the benefits of its use to our economy and our community far outweigh any potential residual risks.

Personally, the loss of hydrogen cyanamide in the kiwifruit industry would mean I would need to find another livelihood after seven years in the kiwifruit industry. It may also mean having to move back

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to Tauranga or Auckland to find another job, rather than being able to live in and support our rural Eastern Bay of Plenty community.

Sincerely,

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██████, Tirohanga Fruit Co Ltd.