

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of hearings on the Proposed Far North Proposed District Plan

**Submission from:**

New Zealand Agricultural Aviation Association (NZAAA)

**To:**

Hearing Commissioners, Hearing 4: Natural Environment Values & Coastal Environment

**Date:**

19/07/2024

## **1. Introduction**

- 1.1 I am Tony Michelle, Executive Officer of the New Zealand Agricultural Aviation Association.
- 1.2 I recently retired after 38 years as an agricultural helicopter pilot and CEO of my own helicopter company in North Canterbury.
- 1.3 The New Zealand Agricultural Aviation Association (NZAAA), a division of Aviation New Zealand (AvNZ), represents fixed-wing and helicopter operators engaged in applying fertilisers, agrichemicals, and vertebrate toxic agents (VTA's) for the purposes of:
- Primary production
  - Biosecurity threats
  - Biodiversity and conservation values

The industry is made up of circa 109 Civil Aviation Authority (CAA) certificated organisations operating circa 76 fixed-wing aircraft and 248 helicopters. Services provided by our industry add an estimated \$2.75BN annually to primary production for the NZ economy alone.

Agricultural aircraft are crucial in maintaining and enhancing primary production, responding to biosecurity threats, and protecting biodiversity values.

Restrictive district plan requirements can adversely affect the ability of aerial operators to undertake and respond to farmer/grower pests/diseases, and biosecurity and biosecurity threats, so the industry seeks to ensure that the use of airstrips and helicopter landing areas for agricultural aviation activities on an intermittent basis are adequately provided for in plans.

## **2. NZAAA's submissions**

## 2.1 Pest plants and pest animals.

2.2 NZAAA made a number of submissions and further submissions that relate to pest plants and pest animals:

- S182.003 supporting the definition of conservation activities including pest and weed control
- S182.015 Seeking addition to IB-P7 to provide for management of pest plants and pest animals
- FS109.10 further submission supporting Horticulture NZ seeking amendments to IB-P7.

2.3 Section 6.2.10 of the s42A Report for Indigenous Biodiversity addresses submissions relating to pests and recommends that a new definition be included for pest as follows:

*Pest means an organism specified as a pest in the current Northland Pest Management Plan.*

2.4 The introduction of this definition limits the application of the word 'pest' in the PDP to pests in the Northland Pest Management Plan (NPMP).

2.5 Not all pest plants and pest animals will be identified in the NPMP, therefore the definition is limiting.

2.6 In addition unwanted organisms under the Biosecurity Act will not be identified in the NPMP as they are not a known and identified pest.

2.7 The submission of HortNZ sought that IB-P7 be amended as follows:

*Provide for the active management of pest plants and pest animals **including** those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993. (Emphasis added)*

2.8 The submission point specifically used the word 'including' so that *pest plants and pest animals* weren't sought to be limited to only those in the NPMP.

2.9 The s42A Report writer has taken the definition of pest from the Biosecurity Act 1993 and applied it to the PDP:

*Pest means an organism specified as a pest in a pest management plan*

2.10 However such an approach does not consider the different context between the Biosecurity Act and the PDP.

2.11 The Biosecurity Act 1993 sets criteria for selection of specified pests in a Regional Pest Management Plan as priority pests to be addressed at a regional level.

*The Biosecurity Act 1993 (the Act) has prerequisite criteria that must be met to justify such intervention. The Plan identifies those organisms classified as pests and marine pathways to be managed through the Plan. (NPMP 1.1 Purpose)*

- 2.12 Non-inclusion in the NPMP does not mean that a pest plant or pest animal is not important, or that the district level priority may be different.
- 2.11 The NPMP states that the plan “is a plan for the eradication or effective management of specified pest species or groups of pests.”
- 2.12 Therefore to limit ‘pests’ in the PDP to those in the Northland Pest Management Plan does not enable the PDP to address other pests in the district that are important to control for the environment, economy and culture.
- 2.13 The s42A Report writer also is concerned about inclusion of dogs as a pest. This consideration appears to override the broad nature of pest plants and pest animals in the Far North that the PDP seeks to address through the policy framework which identifies that the introduction of pest plants and species can all diminish the quality and extent of indigenous ecosystems.
- 2.14 Therefore NZAAA does not support the recommended addition of a definition for pest as Para 224 of the s42A Report.
- 2.15 If a definition is sought to be included it should align with the change to the policy as sought by HortNZ

*Provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.*

- 2.16 NZAAA sought that the IB-P7 also ‘provide for’ active management of pest plants and pest animals.
- 2.17 The s42A Report (209) does not support the submissions to strengthen the wording of IB-P7 as the stronger policy focus on regulatory options for pest control is IB-P9.
- 2.18 However IB-P9 is focused on pests and pest species to avoid risks to threatened indigenous species , including kiwi.
- 2.19 Pest management is undertaken for a range of reasons which aren’t included in IB-P9 so it is appropriate that IB-P7 provide for pest management to be undertaken for broader reasons than IB-P9.
- 2.20 Therefore NZAAA does not accept the recommendation to reject the submission of HortNZ and NZAAA which seek that the wording of IB-P7 ‘provide for’ the active management of pest plants and pest animals.

### **3. Decisions sought**

3.1 Amend IB-P7 as follows:

*Provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.*

Thank you for the opportunity to present this statement in support of the NZAAA's submissions.

A handwritten signature in black ink, appearing to read 'Tony Michelle', is positioned above the typed name.

Tony Michelle  
Executive Officer  
NZ Agricultural Aviation Association