

Appendix 8: Summary of pre-lodgement consultation responses

Full reports/memo/letters/emails to be included as attachments to this summary table

Party		Feedback	Recommendations for application	Accepted or Rejected	How feedback has been addressed	Additional comments
Papatipu rūnanga	Kaikōura	No response received as at COB 15/10/21				
	Te Ngāi Tūāhuriri Runanga	<p>Advice provided by MKT on behalf of these papatipu rūnanga</p> <p>All 6 Papatipu Runanga were given the opportunity to provide feedback.</p> <p>Te Ngāi Tūāhuriri Rūnanga kaitiaki are opposed to the use of glyphosate within the vicinity of a waterway until the Environmental Protection Agency (EPA) have given recommendations regarding the continued use of this chemical in Aotearoa.</p> <p>The kaitiaki have concerns regarding lowered instream flows, and that these are no longer sufficient to allow for clearance of weeds and movements that shape the structure of the river. The health of the waterway must be considered ki uta ki tai.</p> <p>The kaitiaki of all rūnanga were supportive of the following recommendations. In addition, Mahaanui Kurataiao recommend Environment Canterbury refer to the NIWA report on Weed Management and Flooding in the</p>	<ul style="list-style-type: none"> Environment Canterbury should be providing a long-term plan for maintenance of the waterways that includes riparian planting and provision of shade trees to prohibit in-stream weed growth in smaller waterways. Cease the use of glyphosate until a decision has been made by the EPA. A 'phasing out of usage' clause as set in EPA decisions. Where possible- chemical free alternatives should be used such as mowing, grubbing or planting. No sprays to reach standing or running water that are not specifically proven to be safe in the aquatic environment. The number and frequency of proposed sampling should be increased. 	<ol style="list-style-type: none"> Accept Reject – as there is currently no review of glyphosate in NZ by the EPA we cannot meet this request. There is no certainty a review will be done, or how long any such future review would take. The EPA is currently gathering info about the use of glyphosate in NZ to determine if a review is necessary. Partially accept – we are proposing to reduce use over time, but it may not be possible or feasible to completely phase 	<ol style="list-style-type: none"> This will come in the form of the strategic spray management plan along with other ECan initiatives such as Braided River Revival and management plans We will keep monitoring the situation with glyphosate and the EPA processes and evaluate its use as necessary Set out in the strategic spray management plan and the commitment to reduce herbicide use through time As set out in the strategic spray management plan and condition 12 	
	Te Hapū o Ngāti Wheke (Rāpaki)					
	Te Runanga o Koukourārata					
	Wairewa Rūnanga					
	Taumutu Runanga					
	Ōnuku Runanga					

			<p>Pūharakekenui/Styx River (July 2021).</p> <ul style="list-style-type: none"> • Communication with the rūnanga regarding future spray operations in their takiwā should be through Mahaanui Kurataiao. • Spray drift mitigation including large droplet size and low ground boom during application. • The rūnanga are not supportive of off label use of herbicides (such as for cleaning of machinery). <ul style="list-style-type: none"> a. Mechanical machinery should be cleaned with hot water or steam in between waterways. 	<p>out all herbicide use</p> <p>4. Accept</p> <p>5. Accept – only substances approved for aquatic applications will be used, but note that they may still have a toxic to the aquatic environment classification</p> <p>6. Further info needed on request – what is the preferred number or frequency of sampling events? We have been doing 6 sites under the previous consent too.</p> <p>7. Accept</p> <p>8. Accept</p> <p>9. Accept – we are not aware of any such off label use and would not permit it with our operations</p>	<p>5. Included in proposed conditions – see conditions 3, 14</p> <p>6. Conditions 36-42 set out our proposed water quality monitoring. Further detail needed on the preferred number of sampling events if 6 per year is not considered acceptable.</p> <p>7. In condition 18, 22, acknowledging that comms to come via MKT rather than direct to rūnanga. Expectation is that MKT will be passing this info on to the right people at the right time.</p> <p>8. The spray handbook sets out operational practices to reduce spray drift, operations must be in accordance with the handbook as per condition 10. Strengthen proposed conditions around managing spray drift by introducing specified wind speed restrictions.</p> <p>9. No ‘off label’ use is permitted in ECan operations.</p>	
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	Te Runanga o Arowhenua	<p>Te Runanga o Arowhenua remains strongly opposed to the discharge of chemicals into water within its takiwā. This strong position being within the Iwi Management Plan of Kati Huirapa 1992 (IEMP) which states that <i>there be no spraying of any toxic chemicals in or near rivers, lakes, sea and other natural waterbodies</i>. Anything other than avoiding the use of chemicals is therefore undermining the position of Arowhenua and the approval for consent is not given lightly.</p> <p>It is acknowledged that the application recognises the strong aversion to and risks of using chemical sprays and looks to establish strict parameters arounds its use to protect the health and safety of the water, taonga species and people. Arowhenua particularly note that Environment Canterbury will avoid spraying in areas of known mahinga kai and alternative control methods will be used. We anticipate that ECan undertakes discussion with Runanga to understand where these sites are, recognising the majority of gathering sites are outside of mātaihai areas.</p> <p>Ongoing notification of Marae and AEC of when and where spraying occurs within the takiwā is also supported as is signs being</p>	<ol style="list-style-type: none"> Engage with Arowhenua to identify areas of mahinga kai that need alternative management techniques applied. Ongoing notification to AEC and Marae of spray works Signage placed at spray sites to warn of spraying in progress Assurances that applications of spray will be strictly managed and contractors supervised when there is a risk spray may enter water Amend AEE to acknowledge that the application is not just about applying sprays but a combination of management techniques depending on site specific needs. Amend AEE to include acknowledgement that IEMP does not support the grazing of animals along waterways, but that the management of weeds does support several policies of the IEMP Apply for a short consent duration 	<ol style="list-style-type: none"> Accept Accept Accept Partially accept – contractors may not always be supervised but must be appropriately trained and qualified. Audits of work sites to check compliance Technically reject – the application is technically only needed for agrichemical discharge so that is what we need to apply for but accept that our overall management approach is a combination and we can make that more explicit Accept. Noted that one of the original reasons for including grazing was a suggestion from an AEC Cultural Consultant at a past hui around 	<ol style="list-style-type: none"> ACTION: Environment Canterbury will organise a hui with AEC and Arowhenua Rūnanga to identify these areas. This hui to be held by end of year 2021. Notification to Arowhenua is included in proposed conditions. See condition 18 and 43. Existing BAU process to provide monthly updates to Runanga on what work is planned for the coming month. Placement of signage is included in proposed conditions. See condition 24. Conditions proposed around contractor training, qualifications and experience, see condition 13. Part of ECan job management/Contractor Management processes to carry out audits on work sites to check compliance with consent conditions Update AEE content to reflect our overall management approach is a combination of different control techniques which will include herbicides where appropriate Update AEE as requested 	
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		<p>placed at the sites advising of spraying in the area.</p> <p>Assurance is sought that anyone engaged to undertake work under the consent will adhere to strict spraying protocols and where there is a high possibility of spray entering water that contractors are supervised. Runanga have observed where contractors are spraying from trucks with little regard for spray entering water.</p> <p>Re Consideration of Alternatives, it is suggested that the report look to acknowledge that the application is not just the use of chemicals but is more a combination of different methods to accommodate the situation and nature of the environment.</p> <p>AEC would like to see the report acknowledge that the Kati Huirapa IEMP does not support grazing of animals alongside natural waterbodies. However it does acknowledge that weed removal supports several IEMP policies as the activity will assist in maintaining fish passage and that protection and restoration of natural habitats are encouraged.</p> <p>It is requested that ECan apply a short consent duration to allow the mauri and mana of specific waterbodies and how they are to be managed, to be appropriate discussed an incorporated into the future management of the</p>		<p>grazing goats for weed control</p> <p>7. Accept. We anticipate a relatively short (compared to the possible 35 years) duration consent</p>	<p>7. We will request a 20 year duration, but anticipate a shorter duration is likely.</p>	
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		waterbodies within the takiwā of Arowhenua ki uta ki tai.				
	Te Runanga o Waihao	Te Runanga o Waihao have concerns with the proposal regarding effects on mahinga kai and aquatic ecology. Additional information has been requested by the rūnanga to help inform their review of the draft consent, and this has been provided on 14/10/21.				
	Moeraki	Supports the position and feedback of Te Runanga o Arowhenua	As for Arowhenua feedback	As for Arowhenua feedback	As for Arowhenua feedback	
Te Runanga o Ngai Tahu						
Department of Conservation <i>Te Papa Atawhai</i>		<p>Response received from Janine Sidery, Statutory Manager for Eastern South Island.</p> <p>Noting that these are pre-application comments for incorporation into the draft application and AEE and do not prejudge any submission DOC may make when the application is notified.</p> <p>General comments:</p> <ul style="list-style-type: none"> The draft is a comprehensive document that addresses most of DOC's concerns Of significance for DOC is that ECan allows DOC to utilise its current consents by specific agreement. This has been key for DOC's work on rivers including bird nesting 	<ol style="list-style-type: none"> More emphasis needed on benefits of weed management for habitat enhancement Identification/confirmation of habitats of significant species <ol style="list-style-type: none"> Threatened plants Indigenous freshwater fish species including Canterbury Mudfish, Kakahi, Lowland Longjaw and Bignose Galaxias Include policy 23 of the Coastal Policy Statement in full in legal and planning section 	<ol style="list-style-type: none"> Accept Accept Accept Accept Accept Accept 	<ol style="list-style-type: none"> Strengthen positive effects description to place greater emphasis on the benefits for habitat protection and enhancement Regarding threatened plant sites – ACTION: we would appreciate DOC assistance in identifying threatened plant sites within the proposed spray reaches. Sites that DOC can be provided will be listed in this application and steps put in place to avoid spraying in these areas as per our processes for avoiding other sensitive areas. Regarding the freshwater fish sites - The sites that have been included in this application are those that are listed in the most up to date version of the critical 	

	<p>habitat provision. For biodiversity protection and habitat restoration it is important for DOC that this agreement continues under the new consent.</p> <ul style="list-style-type: none"> • A potential positive effect of weed spraying is indigenous habitat or enhancement restoration which gets passing mention. Maybe more emphasis could be placed on this. • More identification (or confirmation) of threatened species and habitat locations is required as more information has become available since the original consents were granted. See specific comments below. <p>Specific comments:</p> <p>6.4.2 Riverbed plants; 6.4.3 Vegetation in the berms (pg 46). Threatened plant sites need to be identified if they are near the waterways that may be subject to spray (DOC could possibly provide some information on this).</p> <p>6.5.3 Critical habitats for indigenous native fish (pp 50-52). Specifically for Canterbury Mudfish, Lowland Longjaw and Bignose Galaxias, confirm there are no other locations in the spray areas. Dr Nicholas Dunn has the most expertise in this field and his published and unpublished material will be useful reference.</p>	<ol style="list-style-type: none"> 4. Make it clearer that even where certain criteria exist within rivers that may greatly reduce the presence of nesting birds, the risk does still exist and operators must remain vigilant and stop work if nesting is identified 5. Include exactly what part of DOC has been consulted in the "affected parties" consultation section. 6. Correct references to DOC offices in the Spray Handbook. 		<p>habitats layer of Plan Change 7 to the Land and Water Regional plan that fall within the rating district scheme areas only. Given this consent may be used in other areas than just rating districts the full list of PC7 sites should be specified for completeness. ACTION: Add an appendix. Dr Grey and Dr Dunn can advise if these are still not the complete set of important habitat sites that need to be considered when spraying.</p> <p>3. Policy 23 of the NZCPS included in full in Legal and Planning section.</p> <p>4. Amend wording in Nesting Birds section to make it clearer that the criteria that may reduce likelihood of nesting do not completely eliminate the risk of nesting occurring so operators conducting spray operations need to be familiar with bird species and their behaviours and can recognise this and halt work when needed.</p> <p>5. Added that Eastern South Island DOC has been consulted.</p> <p>6. Updated Handbook to correct the references to DOC offices as per current structure.</p>	
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6.5.3.7 Freshwater mussels/kakahi (p54). The locations of kakahi in scheme areas have been identified but other kakahi locations are known to doc but not identified in the application. Confirm whether or not these other known sites are within spray areas. Dr Duncan Grey has a comprehensive idea of where kakahi are located.

7. Legal and Planning (p64). NZ Coastal Policy Statement (DOC2010), Policy 23 Discharge of Contaminants (1)(a-f) should be inserted in full in this section. The NSCPS's importance as the national statutory document for the CMA needs to be emphasised here rather than just summarised in the 'Statutory Assessment' section on p107.

Nesting birds, para 416, p88.
While DOC agrees that the exemption criteria (for bird surveys) will greatly reduce the chances of nesting birds being present it is still possible they may be present. Not necessarily saying a survey needs to be done but the risk is still present. Ensure staff/contractors who undertake spraying know what to look out for and when to halt operations if necessary.

8. Affected parties/Consultation (p102). Should 'Department of Conservation' be expanded to list

		<p>the district and regional offices, as has been done with Papatipu rūnanga, F&G etc?</p> <p>Appendix 3 Rivers Section – Handbook for spraying. DOC is incorrectly referred to as “department of conservation area offices / area conservancies’. These should be referred to respectively as ‘district offices’ and ‘regional offices’ as areas and conservancies no longer exist under the current DOC structure.</p>				
Fish and Game Councils NZ	Nelson Marlborough	No response received as at COB 15/10/21	-	-	-	-
	North Canterbury	No response received as at COB 15/10/21	-	-	-	-
	Central South Island	<p>Windspeed: Wind speed is discussed in the AEE (does not include parameters) but there is nothing about wind speed in the proposed conditions. The paper titled ‘The Investigation and Surveillance of Agrichemical Spraydrift Incidents’ by the Ministry of Health (2007) states that any windspeed over 15km/hr is unsuitable for any spraying. Growsafe indicates that extreme caution should be used with any spray in windspeeds of 15-20km/h and anything over 20km/hr is unsuitable for spraying.</p> <p>Notification: CSIFG would like notification of any aerial spraying. This would enable us to push notification out</p>	<p>Windspeed: We would like to see a maximum wind speed specified</p> <p>Notification: Request that we are added as a party to be notified under condition 22</p> <p>Schools and preschools: Include preschools in assessment</p> <p>Avoiding recreation seasons: CSIFG requests that the opening weekend of game bird hunting is acknowledged (1st weekend in May). We request that these peak rec times are carried through into consent conditions. Add as condition (25a).</p>	<p>Windspeed: Accept</p> <p>Notification: Accept</p> <p>Schools and preschools: Accept</p> <p>Avoiding recreation seasons: Accept</p> <p>Riparian planting: Accept</p> <p>Triclopyr (ester-based) application: Accept</p>	<p>Windspeed: Specify maximum windspeed of 15km/hr as a condition of consent</p> <p>Notification: Add Central South Island Fish and Game as a party listed on Condition 22</p> <p>Schools and preschools: Locations of all preschools assessed and identified, exclusions as per schools applied to preschools.</p> <p>Avoiding recreation seasons: Add avoiding opening weekend of game bird hunting as a condition of consent.</p>	

		<p>to our licence holders in a relevant and timely manner.</p> <p>Schools and preschools: It is noted that a number of schools are listed at section 6.7.2 as being within 250m of waterbodies that may be subject to spraying. It should be noted that kindergartens and preschools have not been included. An example is the Haywood Cottage Montessori in Geraldine, about 500m downstream of the high school on the opposite side and on the banks of the Waihi River.</p> <p>Avoiding recreation seasons: AEE states that spray operations should avoid peak recreational use times within the river beds (i.e. opening/closing weeks of fishing season.)</p> <p>Riparian planting: CSIFG agrees with the technical report of Dr Duncan Gray that suggests that appropriate riparian vegetation could aid in reducing spraying over time as the vegetation establishes. CSIFG strongly supports the development of riparian planting plans to reduce or even negate the need for spraying in the future. This seems particularly relevant in situations where landowners remove trees from riparian areas within river rating districts. The trees may cause flow restrictions and warrant removal at some locations, but on the</p>	<p>Riparian planting: CSIFG strongly supports the development of riparian planting plans to reduce or even negate the need for spraying in the future in areas where trees have been removed (<i>from smaller watercourses eg Ohapi Creek</i>)</p> <p>Triclopyr (ester-based) application: Support recommendation for ongoing monitoring and sampling Support recommendation that no ester-based Triclopyr shall be discharged over surface or shallow ground water due to the toxic effects of that substance on aquatic life.</p>		<p>Riparian planting: Include content within the Agrichemical Strategic management plan around riparian planting, with a focus on follow up planting when trees are being removed.</p> <p>Triclopyr (ester-based) application: Water quality monitoring is proposed as a condition of consent.</p> <p>There are no alternative formations (amine based) of triclopyr on the New Zealand market therefore we cannot avoid its use. Extra precaution required to ensure NIL discharge of triclopyr over water, especially still or slow flowing surface water and areas of shallow groundwater in the river berm.</p>	
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		<p>other hand, they also provide the benefit of shading and cooling of water temps and bank stability. The removal of trees should entail replacement planting with appropriate species so that spraying does not increase over time.</p> <p>Triclopyr (ester-based) application: CSIFG supports the recommendations made by Dr Gray for continued monitoring and sampling. CSIFG also supports Dr Gray’s recommendation that “Triclopyr ester-based herbicides should not be used over or near water due to their toxicity to aquatic life.”</p>				
Apiculture New Zealand	<p>Agrichemicals can have significant impacts on bees. River beds have been used as hive sites for many years and there have been examples where spraying has caused significant issues. The beekeepers acknowledge that spraying is a necessity and generally support the work undertaken within river beds, but issues need to be addressed with this application.</p> <p>Issues to be addressed:</p> <ol style="list-style-type: none">1. Agrichemical impacts on bees and honey2. Addressing loss of bees attributed to river spraying3. Examples where consent has not been followed and resulting issues	<p>Issue 1 – agrichemicals impacting on bees (bee deaths and residues in bee products)</p> <p>Recommendation:</p> <p>Current conditions around surfactant use are sufficient to prevent harm to bees provided they are complied with.</p> <p>Current condition around spraying minimum of 50m from hives is fit for purpose assuming spraying is done in low wind conditions where spray will not drift.</p> <p>Recommended condition amendment – “There shall be no discharge <u>of active chemical/s or surfactant</u> onto plants in flower</p>	<p>Issue 1 / Recommendation – Accepted</p> <p>Issue 2 – Noted, however we have provided feedback to Apiculture NZ that the company who experienced hive deaths had never raised this issue with CRC before now so we were unaware of this occurring.</p> <p>Issue 3 – Rejected. We have been providing the proposed spray plan as required, however it was not</p>	<p>Issue 1 – the following draft conditions been proposed:</p> <ul style="list-style-type: none">• There shall be no discharge of herbicides or adjuvants within 50 metres of any beehive• There shall be no discharge of herbicides or adjuvants on plants in flower when there is evidence of bees or other pollinators foraging on those plants. <p>Issue 2 – no specific action for consent application</p> <p>Issue 3 – no specific action for consent application</p> <p>Issue 4 – recommendations to be added to next review of Enviro Guide. Noting we cannot always meet these guidelines for safety or practicality reasons (eg only spraying at sunset)</p>	<p>This feedback had been incorporated into the pre-application draft version of the AEE.</p> <p>Apiculture NZ have reviewed the draft and have no further comments to make and are happy the application addresses their concerns.</p>	

	<p>4. Recommendations to Appendix B</p> <p>5. Communication</p> <p>Summary:</p> <p>Using the same conditions with slightly more added detail will mitigate the negative effects of spraying river beds where domestic and wild bees live. This will protect the health of bees and minimise residues found in honey and bee products which are increasingly being identified and have recently affected NZ's honey export markets.</p> <p>The Apiculture industry is following and undertaking research re: the ongoing issues with glyphosate in honey products for export, which is going to have ongoing implications for beekeeping in the future.</p> <p>Improved communication between ECAN and beekeepers will address a number of issues which have been identified in this review and provide a good platform for working together in the future</p>	<p>where honey bees are likely to be present..."</p> <p>Issue 2 – loss of bees</p> <p>Report outlines that a commercial beekeeping company has regularly experienced hive deaths ‘a couple of times during the spray period most seasons’. They noted they were unaware of spraying occurring at the time of bee deaths.</p> <p>No recommendation put forward.</p> <p>Issue 3 – examples where existing consent has not been followed.</p> <p>The report outlines that spraying has occurred during October/November while our spray handbook advises operations to occur after December. It also noted that CRC have not been supplying a proposed spray plan to the industry in accordance with consent conditions.</p> <p>No recommendation put forward</p> <p>Issue 4 – recommendations to Appendix B (noting ‘Appendix B’ is the Rivers Section Environmental Guide, a guide produced independent of the agrichemical consent).</p> <p>Recommendations: Suggested amendments to the content of the Enviro Guide.</p> <p>Issue 5 – Communication</p>	<p>being sent on within the industry</p> <p>Issue 4 / recommendations – Accepted</p> <p>Issue 5 / recommendations - Accepted</p>	<p>Issue 5 – we welcome the assistance of ApiNZ in the development and maintenance of a contact list and have asked that the suggested spray contact list is developed ASAP</p> <p>The following draft conditions (relating to communication) have been proposed:</p> <ul style="list-style-type: none"> Annually by X month the consent holder shall prepare the “Proposed Plan for Agrichemical discharge”. The Proposed Plan shall identify application areas, proposed dates, herbicides to be used and method of application. This Plan shall be forwarded to the following parties by X date: <ul style="list-style-type: none"> Canterbury Regional Council Compliance Papatipu Runanga Canterbury Hub of Apiculture NZ F&G TA's CDHB DOC TRoNT The parties listed in condition X shall be invited to provide feedback on the proposed spray programme (set out in the Proposed Plan for Agrichemical discharge) within 15 working days of receiving the plan. The Consent Holder shall invite the parties listed in condition X to an annual meeting to discuss: <ul style="list-style-type: none"> The draft Proposed Plan for Agrichemical discharge, prepared in accordance with condition 19 Any areas of concern Spraying practices 	
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			<p>Recommendations:</p> <p>The creation of a more comprehensive spraying notification list that the Canterbury Hub are happy to coordinate on behalf of ECan.</p> <p>Noted that if hives have been worked they cannot be move for at least 48 hours, and as spraying is typically done during the busy season for beekeepers they need as much advance notice as possible in accordance with existing consent conditions.</p>		<ul style="list-style-type: none"> - Monitoring results - Current and predicted herbicide use - Contractor performance assessments - Specific herbicides proposed to be used - Any new herbicides proposed to be used that haven't been discharged before (in accordance with condition X) - Any actions taken to reduce herbicide use <ul style="list-style-type: none"> • In the addition to the provision of the Proposed Spray Plan to the Canterbury Hub of Apiculture NZ in accordance with Condition X, at least X Days prior to any herbicide discharge operations the Consent Holder must notify the following parties: <ul style="list-style-type: none"> - Canterbury Hub of Apiculture NZ - The New Zealand American Foul Brood Agency - Any known local bee keepers who may be operating hives in the proposed spray area. 	
Canterbury District Health Board / Crown Public Health	South Canterbury	No response received as at COB 15/10/21	-	-	-	-
	North Canterbury	No response received as at COB 15/10/21	-	-	-	-
Forest and Bird		Nicky Snoyink, Canterbury Regional Conservation Manager for Forest and Bird has provided comment on behalf of Forest and Bird on public and ecosystem health, significant natural areas	<p>Public and Ecosystem Health:</p> <p>Recommendations: Adopt a strong precautionary approach to the use of chemicals to void harm to public health and to ecosystem health;</p>	<p>Public and Ecosystem Health: Accept</p> <p>Significant Natural Areas:</p>	<p>We have proposed the following draft conditions to give effect to the F&B recommendations:</p> <p>Public and Ecosystem Health:</p>	

	<p>and education and training in relation to the spray operation.</p> <p>Public and Ecosystem Health</p> <p>While Forest & Bird recognise there are benefits to using chemicals to protect and restore indigenous biodiversity, there is considerable concern among our supporters about the health impact of weed and pest control chemicals, on people and on ecosystems, and also the degree to which chemical residue is found in food products.</p> <p>Forest & Bird strongly recommends research and development of alternative pest and weed control methods to reduce the dependence of harm causing chemicals, generally</p> <p>Significant Natural Areas</p> <p>Forest & Bird acknowledges that weed control can be a necessary part of achieving RMA obligations, but we stress that weed control should not result in the reduction of indigenous species or loss of habitat, dryland or freshwater in braided river environments.</p> <p>Forest & Bird recommends that spraying should not occur during braided river bird nesting season at all, considering that the birds vacate the river environment for at least half the year which</p>	<p>invest in research and development of alternative methods for weed control that reduces reliance on chemicals; include a condition that enables the review of the consent in light of new information from the EPA or any other organisation regarding the safety of chemicals</p> <p>Significant Natural Areas:</p> <p>Recommendations: Include conditions that require checking relevant district plans for identified SNA; use a suitably qualified person to undertake an assessment of ecological significance against criteria before undertaking any type of spraying; the suitably qualified expert must determine the method spraying, if spraying is appropriate; avoid spraying in riverbeds during braided river bird nesting season.</p> <p>Training and Education:</p> <p>Recommendations: Ensure a condition to require that personnel and contractors who undertake spraying operations are trained in recognising significant natural areas and native species that are at risk and declining. Ensure that appropriate training is offered to personnel and contractors.</p>	<p>Accept</p> <p>Training and Education:</p> <p>Accept</p>	<p>The consent holder shall prepare an Agrichemical Strategic Management Plan within the first year of this consent being granted and review that plan bi-annually. This plan shall be available to Canterbury Regional Council on request and include, but not be limited to:</p> <ul style="list-style-type: none"> - A review of current practises regarding agrichemical use and alternative agrichemical compounds that could be used. - A review of current agrichemicals in use to determine if there have been changes to the hazard classification or controls required for that substance or approval for that substance to be used in New Zealand. - An assessment of alternatives to agrichemical spraying and identifying sites where these alternatives can be employed. - Committing to progressively extending the areas where alternatives to agrichemicals spraying is employed with a goal of decreasing agrichemical use over the duration of the consent. <p>Agrichemical discharge must only be carried out where there are no practical alternatives to vegetation management (as</p>	
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	<p>provides a safer a window to undertake spraying.</p> <p>Training and education</p> <p>Forest & Bird is concerned that personnel tasked with undertaking weed control and some spraying contractors are not well trained or educated at identifying native species and habitat. Our experience is that on occasion, areas of native species and habitat have been either inadvertently or deliberately sprayed. It is concerning that some contractors continue to advertise weed spraying of native species that are classified as at risk and declining</p>			<p>identified in the Agrichemical Strategic Management Plan).</p> <p>Significant Natural Areas:</p> <p>No spray operations in the active river may occur within 100 metres of colonies of birds nesting or rearing chicks.</p> <p>No spray vehicles may operate within 50 metres of nesting birds.</p> <p>+ standard bird survey condition</p> <p>Prior to spraying, any areas listed as a Significant Natural Area (SNA) in the relevant District Plan must be identified and spraying must only proceed within any identified SNAs where the risks to indigenous biodiversity are controlled in accordance with advice from a suitably qualified Terrestrial Ecologist.</p> <p>Training and Education:</p> <p>All persons discharging agrichemical under the authorisation of this consent must:</p> <ul style="list-style-type: none"> - hold the required relevant qualification for the agrichemical and method of discharge; - be provided with a copy of this Resource Consent and 	
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					the Rivers Handbook for Spraying; - understand operational practices; and - be trained in the identification of wetland areas, native vegetation and braided river bird nesting habitat.	
District/City Councils	<i>All Canterbury District Councils were informed of draft AEE and offered to request a copy to review and/or comment on. Waitaki District Council, Mackenzie District Council and Ashburton District Council requested a copy of the draft AEE. Only the one response below was received as at COB 15/10/21</i>					
	Mackenzie District Council	Assess the proposal against the requirements of the Operative Mackenzie District Plan 2004	-No change to proposal requested as of COB 15/10/21	Accepted	Compliance with District Plan will be assessed	-
Land Information New Zealand / Toitū te Whenua		Unable to provide a response within deadline, will continue to work with LINZ through the consent process.	-	-	-	-