

Submission

To: Canterbury Regional Council
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via email: floodbylaw@ecan.govt.nz

Submission on: Canterbury Regional Council application for resource consents to discharge agrichemicals CRC222040 CRC222041 CRC222043

Date: 27 July 2023
Submission by: Apiculture New Zealand
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Apiculture New Zealand (ApiNZ) has an interest in these applications for resource consents (discharge permits) to discharge agrichemicals CRC222040 CRC222041 CRC222043 that is greater than the interest that the general public has.

Please refer to the attached table for the specific provisions of the application for resource consents from the Canterbury Regional Council to replace expired consents CRC 981580 and CRC 041535. The table also contains details of ApiNZ's submission and whether we support or oppose the specific provisions on which we have submitted.

The decisions sought by ApiNZ are outlined in the table attached to this submission.

ApiNZ does not wish to be heard in support of this submission.

ApiNZ could not gain an advantage in trade competition through this submission.

ApiNZ seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made.

Introduction

ApiNZ welcomes the opportunity to submit on the Canterbury Regional Council's application for resource consents to discharge agrichemicals CRC222040 CRC222041 CRC222043.

ApiNZ is the national body representing the apiculture industry in New Zealand covering the full range of sectors, from hobbyist and commercial beekeepers to honey exporters, packers and suppliers. ApiNZ aims to support and deliver benefits to the New Zealand apiculture industry by supporting a thriving long-term future for New Zealand honeybee products and services, including having a strong bee health and biosecurity position.

General comments

ApiNZ supports the spraying of riverbeds as it is a necessity for the maintenance of braided riverbeds. The use of riverbeds as sites for hive yards has a long history on the Canterbury Plains. Riverbeds also provide domestic and wild bees with a rich source of pollen and nectar.

However, agrichemicals can have major impacts on bees including death, contaminating their honey and reducing their ability to pollinate. As plant flowering and bee activities increase through the spring and summer months, the risk to bees from spray application also rises.

The Canterbury Regional Council sought information from the apiculture industry in 2021 as part of their pre-lodgement consultation process. ApiNZ welcomes the opportunity to work more closely with the Canterbury Regional Council in this area in the future. While many of our recommendations from the pre-lodgement consultation have been accepted, we have some further comments about the proposed consent conditions in Appendix 11: Proposed conditions.

Communication

It is important that beekeepers are notified as soon as possible about any spraying so that they can protect their bees. Condition 23 of the proposed consent conditions states that if agrichemical use is required outside of what was identified in the "Proposed Plan of Agrichemical Discharge" due to it being unforeseen prior to 31 August, then the parties shall be notified ten days prior to the discharge occurring. Condition 24 has a requirement for notification of any agrichemical discharge to the listed parties at least ten days prior. The requirements in these two conditions are inconsistent. ApiNZ recommends that condition 23 be amended to say "as soon as possible and at least" ten days prior to the discharge occurring to give beekeepers as much notice as possible.

Condition 24 c) requires "any known and local beekeepers who may be operating hives in the proposed spray area" to be notified at least ten days prior to any agrichemical discharge. As this consent will be for 20 years there should be an obligation to keep up to date with changes in the

beekeepers operating in the area. This condition should also not just be restricted to local beekeepers as many commercial beekeepers have hives in several regions.

Information on spraying schedules should also be easier for beekeepers to access. Some agencies place this information on their website, including Operational Solutions for Primary Industries (OSPRI). We support the Canterbury Regional Council doing this as well. OSPRI also publish information on the location and proposed timing of each aerial 1080 drop.

In addition, we also recommend the Canterbury Regional Council takes up the offer from the Canterbury Hub of ApiNZ to help them create and maintain a comprehensive spraying email list of relevant agencies and people so that information can be sent directly to interested parties.

Comments on proposed consent conditions

Section Two of this submission contains a table with our feedback on Appendix 11: Proposed consent conditions.

Yours sincerely

Karin Kos
Chief Executive

Section Two: Submission on resource consent applications CRC222040 CRC222041 CRC222043

ApiNZ comment on the proposed consent conditions in Appendix 11

Proposed consent condition	Submission point	Support/Oppose	ApiNZ submission	Relief sought
Scope				
Condition 10	1	Support in part	There is no list of parties listed in condition 19. This list is actually in condition 20.	ApiNZ seeks the following relief: Where the agrichemical strategic management plan, and subsequent reviews identify changes to the types and use of agrichemicals or alternative vegetation control techniques, these will be notified to the parties listed in Condition 19 20 of this consent.
General Management				
Condition 15	2	Support	ApiNZ supports the condition requiring that all practical measures should be taken to reduce the risk of spray drifting beyond the target application area.	No relief sought.
Annual planning of works				

Proposed consent condition	Submission point	Support/Oppose	ApiNZ submission	Relief sought
Condition 20	3	Support	ApiNZ supports the annual planning forum including representatives from the apiculture sector.	No relief sought.
Condition 21	4	Support in part	There is no list of parties listed in condition 19. This list is actually in condition 20.	ApiNZ seeks the following relief: The parties listed in Conditions 19 20 shall, within 15 working days of receiving the “Proposed Plan for Agrichemical Discharge” be invited to...
Condition 22	5	Support in part	The list of parties that the consent holder should invite to an annual meeting currently refers to condition 19. This list is actually in condition 20 of the proposed conditions. ApiNZ supports the list of the items to be discussed at the annual meeting.	ApiNZ seeks the following relief: The consent holder shall invite the parties listed in condition 19 20 to an annual meeting.
Condition 23	6	Oppose in part	The list of parties that the consent holder should notify of a discharge of agrichemicals outside of what was identified in the Proposed Plan of Agrichemical use currently refers to condition 19. This list is actually in condition 20 of the proposed conditions.	ApiNZ seeks the following relief: The parties listed in Condition 19 20 shall be notified as soon as possible and at least 10 days prior to the discharge occurring.

Proposed consent condition	Submission point	Support/Oppose	ApiNZ submission	Relief sought
			Notification of a discharge of agrichemicals outside of what was identified in the Proposed Plan of Agrichemical use should not be restricted to only 10 days before the discharge. It should be at least 10 days, preferably as soon as the discharge is known about. Condition 24 has a notification requirement of at least 10 days, so these requirements are currently inconsistent. This condition also creates a disincentive to include discharges in the annual planning of works programme.	
Notification of planning prior to works				
Condition 24	7	Support in part	It is important that all beekeepers operating hives in the spray area know about any proposed spraying so they can adequately protect their bees. Condition 24(c) only requires known and local beekeepers who could be operating in the proposed spray area to be notified. As this consent is for 20 years there should be an obligation to keep up to date with changes in the beekeepers that are operating in the area. This condition should also not just be	<p>ApiNZ seeks the following relief:</p> <p>c) any known local beekeepers who may be operating hives in the proposed spray area.</p> <p>Information about upcoming plans to discharge agrochemicals should also be available on Canterbury Regional Council's website and an email list of relevant agencies and people should be developed with the help of ApiNZ's Canterbury Hub so that</p>

Proposed consent condition	Submission point	Support/Oppose	ApiNZ submission	Relief sought
			<p>restricted to local beekeepers as many commercial beekeepers have hives in several regions.</p> <p>Information on spraying schedules should be easier for beekeepers to access.</p>	information can be sent directly to interested parties.
Condition 26	8	Support	ApiNZ supports notices being erected and maintained at places where people normally obtain access to the spray area. We also support the requirements for these notices.	No relief sought.
Restricted activities and excluded locations				
Condition 32	9	Support	ApiNZ supports the condition that there shall be no discharge of agrichemicals within 50 metres of a beehive.	No relief sought.
Condition 33	10	Support	ApiNZ supports the condition that there shall be no discharge of agrichemicals onto plants in flower when there is evidence of bees or other pollinators foraging on those plants where there is published evidence that the substance is toxic to bees or other pollinators.	No relief sought.



APICULTURE NEW ZEALAND

Proposed consent condition	Submission point	Support/Oppose	ApiNZ submission	Relief sought
Annual spray completion reporting				
Condition 45	11	Support in part	There is no list of parties listed in condition 19. This list is actually in condition 20.	ApiNZ seeks the following relief: The consent holder shall provide a “Spray Completion Report” to the Canterbury Regional Council Attn: Compliance Monitoring and to the parties listed in Condition 19 20 by the 31 October each year.