



Remember
submissions
close at 5pm,
Friday 21
October 2022

Proposed District Plan submission form

Clause 6 of Schedule 1, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Form 5: Submission on Proposed Far North District Plan

TO: Far North District Council

This is a submission on the Proposed District Plan for the Far North District.

1. Submitter details:

| | | | |
|---|---|-------|-------|
| Full Name: | Antony Michael MICHELLE | | |
| Company / Organisation Name: (if applicable) | NZ Agricultural Aviation Association | | |
| Contact person (if different): | | | |
| Full Postal Address: | NZ Agricultural Aviation Association PO Box 2096, Wellington, 6140 | | |
| Phone contact: | Mobile: 0274 325 085 | Home: | Work: |
| Email (please print): | eonzaaa@aviationnz.co.nz | | |
| 2. (Please select one of the two options below) | | | |
| <input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission <input type="checkbox"/> I could gain an advantage in trade competition through this submission | | | |
| <i>If you could gain an advantage in trade competition through this submission, please complete point 3 below</i> | | | |
| 3. <input type="checkbox"/> I am directly affected by an effect of the subject matter of the submission that: <ul style="list-style-type: none"> (A) Adversely affects the environment; and (B) Does not relate to trade competition or the effect of trade competition <input type="checkbox"/> I am not directly affected by an effect of the subject matter of the submission that: <ul style="list-style-type: none"> (A) Adversely affects the environment; and (B) Does not relate to trade competition or the effect of trade competition | | | |
| <i>Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991</i> | | | |
| The specific provisions of the Plan that my submission relates to are: Refer attached document | | | |



Confirm your position: Support Support In-part Oppose
Refer attached document

My submission is:
Refer attached document

I seek the following decision from the Council:
Refer attached document

I wish to be heard in support of my submission
 I do not wish to be heard in support of my submission
(Please tick relevant box)

If others make a similar submission, I will consider presenting a joint case with them at a hearing
No

Do you wish to present your submission via Microsoft Teams?
No

Signature of submitter:
(or person authorised to sign on behalf of submitter)

Date: 02/22/2022

(A signature is not required if you are making your submission by electronic means)

Important information:

1. The Council must receive this submission before the closing date and time for submissions (5pm 21 October 2022)



2. Please note that submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your submission will only be used for the purpose of the District Plan Review.
3. Submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

Send your submission to:

Post to:

Proposed District Plan
Strategic Planning and Policy, Far North District Council
Far North District Council,
Private Bag 752
KAIKOHE 0400

Email to:

pdp@fndc.govt.nz

Or you can also deliver this submission form to any Far North District Council service centre or library, from 8am – 5pm Monday to Friday.

Submissions close 5pm, 21 October 2022

Please refer to pdp.fndc.govt.nz for further information and updates.

Please note that original documents will not be returned. Please retain copies for your file.

Note to person making submission

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

FAR NORTH DISTRICT COUNCIL DISTRICT PLAN

IN THE MATTER

of the Proposed Draft of the District Plan

**STATEMENT BY TONY MICHELLE (EXECUTIVE OFFICER)
FOR THE NEW ZEALAND AGRICULTURAL AVIATION ASSOCIATION
19/10/2022**



1. ABOUT NZAAA

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
- Forestry production
- Crop protection and disease control
- Weed and pest control
- 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 \$2.7BN annually to primary production for the NZ economy alone.

Agricultural aviation activities are deemed to be an essential service that is crucial in maintaining and enhancing primary sector production, ensuring animal welfare, responding to biosecurity threats, and protecting biodiversity values.

An in-depth description of agricultural aviation activity can be found on the Quality Planning website at <https://www.qualityplanning.org.nz/index.php/node/709>

2. EXECUTIVE OFFICER QUALIFICATIONS AND EXPERIENCE

Tony Michelle, Executive Officer (EO) NZAAA

My name is Tony Michelle, and I am the EO of NZAAA. I have been in the agricultural aviation industry since 1983 completing 11,000+ hours of flying as a helicopter pilot. I have recently sold my interests in a Company that I owned and managed for 33 years specializing in agricultural aviation activities including land and aquatic weed control, crop protection, fertiliser application, and pest eradication (including International and NZ offshore islands).

3. AGRICULTURAL AVIATION ACTIVITIES - THE USE OF RURAL AIRSTRIPS AND HELICOPTER LANDING AREAS

NZAAA submits that agricultural aviation activities be a permitted activity – Rationale:

- Agricultural aviation adds significant value to farming and primary production for the NZ economy
- Animal welfare is dependent on timely applications of fertiliser at critical seasonal feed deficit crunch points
- Agricultural aviation is used for the application of fertilisers and agrichemicals in areas where the safety risks are too high for ground application
- Rapid responses to biosecurity threats are critical
- Pest and disease outbreaks cannot always be forecast
- Agricultural aviation is critical in maintaining and enhancing NZ's biodiversity values

- Suitable weather conditions for the application of agrichemicals, fertilisers, and vertebrate toxic agents (VTAs) are variable and often unpredictable. Safe and effective applications require operational flexibility to optimise suitable conditions
- Agricultural aviation operates in a highly regulated environment and additional regulation will have a detrimental effect on primary production, ability to respond to biosecurity threats, and enhancing NZ's biodiversity values
- Agricultural aviation activities are part of the rural character of the rural environment and an ancillary activity to primary production activities
- Agricultural aviation activity is intermittent or infrequent – multiple flights are usually undertaken over a relatively short period with no subsequent activity over long periods, therefore, the overall effects are limited and minor.

NZAAA notes that the Council is limited to managing aviation activities while on the ground – that is the take-off and landing – not while the aircraft is in the air. As such rules can be included for the areas where aircraft take-off and land. It is this use of the land that NZAAA seeks as a permitted activity for agricultural aviation activities.

NOTE: Our submission relates to rural airstrips and helicopter landing areas used on an intermittent basis. Aircraft depots/bases that are used on a regular basis are not part of the permitted activity that is sought.

Specific definitions relating to agricultural aviation activities should be included in the plan.

4. **AGRICULTURAL AVIATION AS A PERMITTED ACTIVITY**

NZAAA considers that there are two ways that agricultural aviation activities could be permitted in your district plan:

- (a) Agricultural aviation activities be included as an ancillary activity to primary production, farming, biosecurity, and biodiversity activities;
- OR**
- (b) Inclusion of a specific permitted activity rule that provides for intermittent agricultural aviation activities using rural airstrips or helicopter landing areas for primary production, farming, biosecurity, and biodiversity activities;

AND

Recognition in the noise provisions of the Plan that noise for intermittent agricultural aviation activities are part of the rural environment and exempt from noise restrictions.

NOTE: This rule would be separate from other rules that may manage the use of land for other types of aircraft landings and take-offs at airports or aircraft depots.

5.

DEFINITIONS THAT COULD BE INCLUDED IN THE PLAN FOR CLARITY

Aircraft as defined in the RMA 1991:

Aircraft means any machine that can derive support in the atmosphere from the reactions of the air otherwise than by the reactions of the air against the surface of the earth.

Rationale – this definition “future proofs” the plan. For example - UAV’s (unmanned aerial vehicles or drones) are an emerging technology that will eventually have a similar size and capacity to conventional manned aircraft and therefore will have the same effects that the council is addressing. UAVs are aircraft under this definition.

Rural airstrip

Rural airstrip means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area.

Helicopter landing area

Helicopter landing area means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing.

Agricultural aviation activity

Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production, biosecurity, or biodiversity purposes including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA’s). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV’s)

Day

The definition of a “Day” as it relates to agricultural aircraft activities is 10.5 hours aircraft hours conducted between the beginning of civil morning twilight (MCT) and the end of civil evening twilight (ECT).

NOTE. A day is defined in the Civil Aviation rules as: the hours between—

- (1) the beginning of morning civil twilight, which is when the centre of the rising sun’s disc is 6 degrees below the horizon; and
- (2) the end of evening civil twilight, which is when the centre of the setting sun’s disc is 6 degrees below the horizon

Rationale – Operations are limited by the suitability of weather and often aircraft are forced to cease operations after a short operational period in the interests of flight and/or environmental safety. Additionally – insecticides are applied after 1700 hours to minimise the adverse effects on bees. In the event, the council decides to limit the number of days in the plan it is important to ensure that the limitation does not compromise the ability of the industry to provide services for animal welfare, primary production, weed, and pest control, biosecurity threats, and conservation purposes. It is also important to ensure these limitations do not create an environmental and/or health and safety risk by being unduly restrictive (i.e. encouraging pilots to operate in unsuitable weather conditions)

7. SPECIFIC FEEDBACK RELATING TO THE PROPOSED DRAFT PLAN

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|--------------|--|------------------|---|--|
| Definitions | <p>AGRICULTURAL AVIATION ACTIVITIES</p> <p>New</p> | n/a | NZAAA seeks to have agricultural aviation defined to include primary production, biosecurity, and conservation activities undertaken by agricultural aviation | <p>Add a new definition: S182.001</p> <p><u>Agricultural aviation activities;</u> <u>means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).</u></p> |
| Definitions | <p>AIRCRAFT</p> <p>New</p> | n/a | NZAAA seeks to have the definition of an aircraft included as defined by the RMA to future proof the plan | <p>Add a new definition: S182.002</p> <p><u>Aircraft;</u> <u>means any machine that can derive support in the atmosphere from the reactions of the air otherwise than by the reactions of the air against the surface of the earth</u></p> |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|--------------|---------------------------|------------------|---|--|
| Definitions | CONSERVATION ACTIVITY | Support in part | <p>NZAAA supports the definition of Conservation activities.</p> <p>NZAAA seeks the addition of the word "biosecurity" to the definition for clarification and the inclusion of agricultural aviation for weed and pest control activities in the definition.</p> | <p><u>Add to the definition:</u></p> <p>means the use of land for activities undertaken for the purposes of maintaining, protecting and/or enhancing the natural, historic and/or ecological values of a natural or historic resource. It may include activities which assist to enhance the public's appreciation and recreational enjoyment of the resource and includes:</p> <ul style="list-style-type: none"> • planting; • pest and weed control <u>including the use of agricultural aviation;</u> • plant and tree nurseries; and • track construction. • <u>biosecurity</u> S182.003 |
| Definitions | Farming | Support in part | <p>NZAAA seeks that agricultural aviation is specifically included in the definition of farming so it is clear that it is part of the farming activity</p> | <p><u>Add to the definition:</u></p> <p>Means the use of land for the purpose of agricultural, pastoral or horticultural or apicultural activities including accessory buildings <u>and agricultural aviation</u> but excludes..... S182.004</p> |
| Definitions | GENERAL AVIATION ACTIVITY | Support in part | <p>NZAAA seeks to have a separate definition for Agricultural Aviation as above</p> | <p><u>Delete from the definition:</u> S182.005</p> <ul style="list-style-type: none"> • <u>Agricultural aviation</u> |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|--------------|------------------------------------|------------------|--|--|
| Definitions | HELICOPTER LANDING AREA New | n/a | NZAAA seeks to have a definition of a Helicopter Landing Area included in the plan | Add a new definition: S182.006 <u>Helicopter landing area; means any area of land, building, or structure intended or designed to be used, whether wholly or partly, for helicopter movement or servicing</u> |
| Definitions | IMPROVED PASTURE New | n/a | NZAAA seeks a definition of Improved Pasture as defined in the National Policy Statement for Freshwater Management 2020 (NPSFM 2020) to clarify rules relating to the clearance of native vegetation | Add a new definition: S182.007 <u>Improved Pasture; means an area of land where exotic pasture species have been deliberately sown or maintained for the purpose of pasture production, and species composition and growth has been modified and is being managed for livestock grazing</u> |
| Definitions | PRIMARY PRODUCTION | Support | NZAAA supports the definition that is consistent with the NPS definition | Retain the definition S182.008 |
| Definition | Plantation Forestry activity | Support in part | NZAAA seeks the inclusion of agricultural aviation for forestry activities as it is not included as part of the NES-PF | <u>Add to the definition:</u> <u>For the purposes of this Plan Plantation Forestry includes agricultural aviation activities.</u> S182.009 |
| Definitions | RURAL AIRSTRIP New | n/a | NZAAA seeks to have a definition of a Rural Airstrip included in the plan | Add a new definition: Rural airstrip; S182.010 |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|---|----------------|------------------|--|---|
| | | | | <u>means any defined area of land intended or designed to be used, whether wholly or partly, for the landing, departure, movement, or servicing of aircraft in the rural area.</u> |
| District-wide matters Strategic Direction Rural environment | SD-RE-01 | Support | NZAAA supports enabling strategies so that Primary production activities are able to operate efficiently and effectively | Retain the strategy S182.011 |
| District-wide matters Strategic Direction Rural environment | SD-RE-02 | Support | NZAAA supports the protection of highly productive land | Retain the strategy S182.012 |
| District-wide matters Strategic Direction Natural environment | SD-EP-03 | Support | NZAAA supports protecting ecosystems particularly weed and pest control, and, biosecurity | Retain the strategy S182.013 |
| District-wide matters NATURAL ENVIRONMENT VALUES Ecosystems and indigenous biodiversity | IB-P5 | Support | NZAAA supports policies that do not impose unreasonable restrictions on existing primary production activities | Retain the policy S182.014 |
| District-wide matters | IB-P7 | Support in part | NZAAA policies that actively support and provide for the management of pest plants and pest animals to enhance biodiversity values | <u>Add to the policy statement:</u> S182.015 Encourage, support and provide for the active management of pest plants and pest animals |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|---|----------------|---------------------------------------|---|---|
| NATURAL ENVIRONMENT VALUES Ecosystems and indigenous biodiversity | | | | |
| District-wide matters NATURAL ENVIRONMENT VALUES Ecosystems and indigenous biodiversity | IB-R1 | Support in part Oppose in part | NZAAA supports the rule that permits the clearance of indigenous vegetation from land which was previously cleared for the purposes of maintaining improved pasture NZAAA seeks to have the addition of Improved Pasture added for clarity NZAAA opposes any timeframe limitations on the clearance of indigenous vegetation for the purposes of maintaining improved pasture | <u>The addition of a new clause:</u> <u>14. the clearance of regenerating indigenous vegetation for the maintenance of improved pasture</u> <u>(include a definition of Improved Pasture as sought above)</u> <u>Delete part of 10: S182.016</u> 10. The removal or clearance from land which was previously cleared and <u>the indigenous vegetation to be cleared is less than 10 years old;</u> |
| District-wide matters NATURAL ENVIRONMENT VALUES Ecosystems and indigenous biodiversity | IB-R4 | Oppose in Part | NZAAA opposes limiting the clearance of indigenous vegetation in the Rural Production zone, Horticulture zone, Māori Purpose zone and Treaty Settlement Land Overlay to 5,000m2 if not in a remnant forest over a 5-year period. NZAAA seeks to have the Operative Plan limitation of 2 ha's retained. | <u>Amend rule IB-R4 PER 1:</u> 2. (i) Rural Production zone, Horticulture zone, Māori Purpose zone and Treaty Settlement Land Overlay – <u>20,000m2</u> if not in a remnant forest, otherwise 500m2 in a remnant forest; S182.017 |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|---|----------------|------------------|---|---|
| General District Wide Matters Noise | NOISE-O2 | Support | NZAAA supports the objective that new sensitive activities are located and designed to avoid reverse sensitivity effects | Retain the objective S182.018 |
| General District Wide Matters Noise | New objective | n/a | NZAAA submits that existing noise-generating activities should be able to continue functioning | Add objective: S182.019 <u>Lawfully established and permitted noise-generating activities can continue to function and operate</u> |
| General District Wide Matters Noise | NOISE-R1 | Oppose in part | NZAAA seeks to have a separate rule for agricultural aviation activities | <u>Include new rule as below “NOISE-RX Agricultural aviation activities”</u> S182.020 |
| General District Wide Matters Noise | NOISE-R7 | Oppose in part | NZAAA seeks a separate permitted activity rule for agricultural aviation therefore the exemption in NOISE-R7 is not needed. | <u>Amend NOISE-R7 by deleting:</u> <u>iii) Cropping, topdressing and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones or within Significant Natural areas on a seasonal, temporary or intermittent basis for a period up to 30 days in any 12 month period</u> S182.021 |
| General District Wide matters - Noise | NOISE-RX | New rule | NZAAA seeks a specific rule for agricultural aviation activities to ensure that they are adequately provided for in the Plan. | <u>Include a new rule</u> <u>NOISE-RX Agricultural aviation activities</u> |

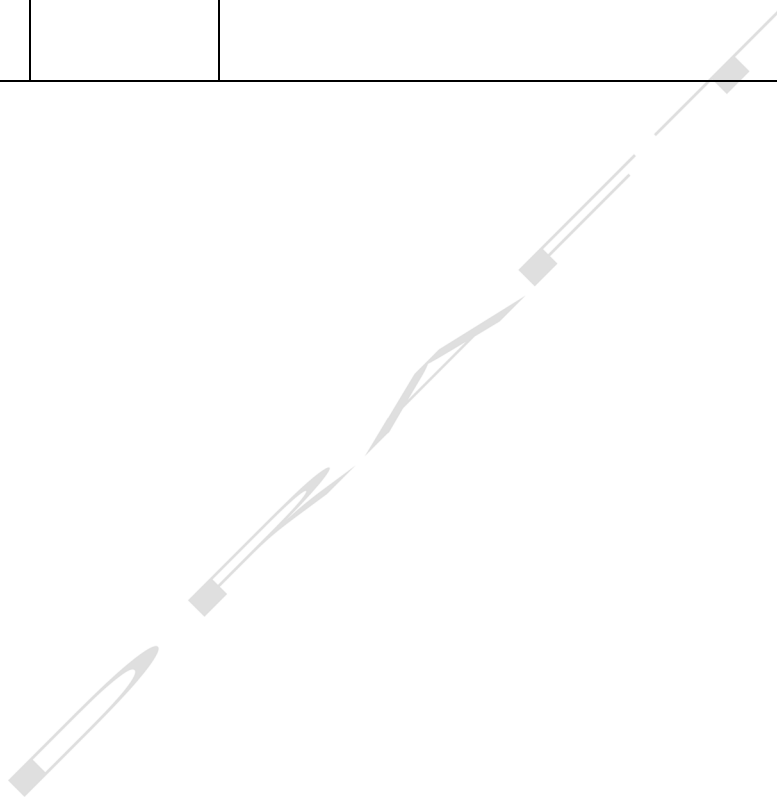
| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|---|----------------|------------------|---|---|
| | | | | <u>Rural production zone</u> <u>Horticulture Zone</u> S182.022 <u>Open Space and Recreation Zone</u> <u>Natural Open Space Zone</u> <u>Agricultural aviation activities for the purpose of farming, forestry or conservation on a seasonal, temporary or intermittent basis for a period up to 30 days in any 12 month period or 315 aircraft hours (whichever is the greater).</u> |
| General District Wide Matters - NOISE | NOISE-S4 | Support in part | NZS6807:2994 Noise management and land use planning for Helicopter landing areas is not an appropriate standard for the temporary and intermittent use of helicopters for agricultural aviation activities. | <u>Amend NOISE-S4 Note by adding:</u> <u>NZS6807:1994 does not apply to agricultural aviation activities.</u> S182.023 |
| General District Wide Matters Temporary Activities | TA-R5 | Support in part | NZAAA seeks to have agricultural activities for conservation activities provided for under a new rule. It should be clear that TA-R5 does not apply to agricultural aviation. | <u>Include a new rule (as above):</u> S182.024 <u>NOISE-RX Agricultural aviation activities</u> |
| Area-specific matters General Rural Zone Rural Production | RPROZ-O1 | Support | NZAAA supports recognising the importance of primary production and its long-term protection | Retain the objective S182.025 |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|---|----------------|------------------|--|---|
| Area-specific matters General Rural Zone Rural Production | RPROZ-O2 | Support | NZAAA supports recognising compatible activities that support primary production | Retain the objective S182.026 |
| Area-specific matters General Rural Zone Rural Production | RPROZ-O3 | Support | NZAAA supports the protection for primary production activities from reverse sensitivity effects | Retain the objective S182.027 |
| Area-specific matters General Rural Zone Rural Production | RPROZ-P1 | Support | NZAAA supports the enabling of primary production and recognition that typical adverse effects should be anticipated and expected | Retain the policy S182.028 |
| Area-specific matters General Rural Zone Rural Production | RPROZ-P2 | Support in part | NZAAA supports enabling and recognising primary production as the predominant land use. NZAAA seeks to have agricultural aviation acknowledged as part of the rural character | Retain the policy and add: S182.029 b. enabling a range of compatible activities that support primary production activities, including ancillary activities, agricultural aviation , rural produce manufacturing, rural produce retail, visitor accommodation and home businesses |
| Area-specific matters General Rural Zone Rural Production | RPROZ-P3 | Support | NZAAA Supports ensuring that reverse sensitivities and non-productive activities do not impact on primary production | Retain the policy S182.030 |
| Area-specific matters General Rural Zone Rural Production | RPROZ-P4 | Support | NZAAA supports ensuring that subdivision maintains or enhances the rural character of the RPROZ including noise and dust associated with the rural environment | Retain the policy S182.031 |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|--|----------------|------------------|--|--|
| Area-specific matters General Rural Zone Rural Production | RPROZ-R7 | Support in part | NZAAA supports farming activities as a permitted activity subject to the inclusion of the amendments sought to the definition | <u>Add to the definition of Farming Activity as previously sought</u> S182.032 |
| Area-specific matters General Rural Zone Rural Production | RPROZ-R8 | Support in part | NZAAA supports conservation activities as a permitted activity subject to the inclusion of the amendments sought to the definition | <u>Add to the definition of Conservation Activity as previously sought</u> S182.033 |
| Area-specific matters Zones Open space and recreation zones Natural open space | NOSZ-O1 | Support | NZAAA supports the protection and enhancement of the Natural Open Space zone | Retain the objective S182.034 |
| Area-specific matters Zones Open space and recreation zones Natural open space | New Policy | n/a | NZAAA seeks recognition in the Plan that vegetation may need to be removed for weed, pest, biosecurity, and biodiversity purposes | <u>Add an additional Policy:</u> S182.035 <u>Provide for the clearance of weeds and pests for biosecurity and biodiversity purposes.</u> |
| Area-specific matters Zones Open space and recreation zones Natural open space | NOSZ-R4 | Support in part | NZAAA supports conservation activities as a permitted activity subject to the inclusion of the amendments sought to the definition | <u>Add to the definition of Conservation Activity as previously sought</u> S182.036 |

| Plan section | Plan provision | Support / Oppose | Reason | Decision sought |
|-------------------|----------------|---------------------|--|---|
| Horticulture Zone | HZ-P3 | Support in part | Ancillary activities for horticulture should include agricultural aviation | <p>Amend HZ-P3: S182.037</p> <p>Enable horticulture and associated ancillary activities, <u>including agricultural aviation</u>, that support the function of the Horticulture Zone.</p> |

Continued next page.....



7. ADDITIONAL INFORMATION

Agricultural Aviation Noise

Noise from agricultural aviation activity is generally accepted in rural areas as beneficial to the economy. Operations are an intermittent seasonal activity, not year-round.

Agricultural aircraft technology has seen much of the fleet transition to efficient larger capacity turbine aircraft and agricultural aircraft noise emissions continue to be reduced as procedures are reviewed, updated, and implemented. Efficiencies and new technologies can lead to lowering the noise profile further.

Minimising Risk

Generally, to minimise risk, agricultural aviation activities occur during settled weather which occurs in the early morning and late evening when thermal mixing is least. Thermal mixing occurs as the ground warms and causes surface air to rise and mix with upper air currents that in turn draw turbulent air back down towards the ground which can lead to:

1. The risk of the product being blown off target into adjoining areas
2. The risk to flight safety with conditions deteriorating to the extent that flying operations are suspended until the conditions are suitable

Economic Impacts

Restricting agricultural aviation activities would compromise the industry's ability to respond to biosecurity and pest and disease outbreaks coupled with the detrimental effects on primary production – particularly animal welfare as it relates to the early spring application of fertiliser.

Agricultural aviation is a key tool in protecting NZ's biodiversity values. Agricultural aviation plays a significant role in the drive toward Predator-free 2050, the MPI program to eradicate wilding conifers from NZ along with weed and pest control on conservation land and other public lands such as riverbeds and lakes.

Standards

Agricultural aviation activities are heavily regulated with the HSWA Act managing operations up to the point of imminent flight at which time the Civil Aviation regulations come into effect. All CAA certificated Agricultural operators require an operating and effective Safety Management System (SMS) under the Civil Aviation Rule Part 100. SMS is certified, monitored, and audited by the Civil Aviation Authority.

In addition to a Commercial pilot license, agricultural-rated pilots undertake extensive specific role training in agricultural operations of at least 75 hours of flight time to attain an "Agricultural rating" and remain under supervision for a further 1000 hours of productive agricultural flight time.

Aviation NZ has a pilot noise abatement training program for both helicopters and fixed-wing. This is available to all agricultural aviation operators and pilots in New Zealand, not just NZAAA and AVNZ members. It trains pilots to minimise noise effects through the way they

operate their aircraft (power settings, flight paths, manoeuvring etc). Noise abatement training is based on the "Fly Neighbourly" program administered by the Helicopter Association International (HAI). Training is renewed biannually.

We would welcome the opportunity to discuss specific provisions for agricultural aviation activities with you and provide further information to assist in your plan development.



Tony Michelle
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0274 325 085

