

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of hearings on the Kaipara Proposed District Plan (KPDP) Hearing 6 - Hazardous Substances

Submission from:

New Zealand Agricultural Aviation Association (NZAAA)

To:

Hearing Commissioners, Hearing 6 - Hazardous Substances

Date:

24/02/2026

1. Introduction

- 1.1 I am Tony Michelle, the Executive Officer of the New Zealand Agricultural Aviation Association.
- 1.2 I recently retired after 38 years as an agricultural and commercial helicopter pilot, and CEO of a helicopter company in North Canterbury.
- 1.3 The New Zealand Agricultural Aviation Association (NZAAA), a division of the Aviation Industry Association of New Zealand (AIANZ), 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.

Agricultural aviation operators are all trained in handling of hazardous substances such as fertilisers, agrichemicals and VTA's and meet all requirements of HSNO and HSWA.

Restrictive district plan requirements can adversely affect the ability of aerial operators to undertake and respond to primary production support, biosecurity and biosecurity threats, so the industry seeks to ensure that the use of rural airstrips and helicopter landing areas

for agricultural aviation activities on an intermittent basis are adequately provided for, along with appropriate land use provisions in plans.

- 1.4 I have been representing the interests of the NZAAA at district plan reviews for 4 years.
- 1.5 NZAAA has engaged Lynette Wharfe, a planning consultant with the Agri Business Group to provide expert evidence on our behalf to Hearing 6 - Hazardous Substances, who will outline the provisions sought by NZAAA in the KPDP.
- 1.6 In addition to the technical evidence submitted by the expert witness, I wish to appraise the Hearing Panel of the importance of farm fertiliser storage bins for primary production activities.

2. HS-R3 Fertiliser storage

- 2.1 NZAAA (146.21) seeks the deletion of HS-R3 Fertiliser storage as on-farm storage of fertiliser are regulated under HSNO and HSWA and associated regulations.
- 2.2 The s42A Report recommends that the submission is rejected and the rule retained on the basis that the activity is permitted subject to standards in the rule.
- 2.3 Fertiliser application is seasonal and undertaken to maintain productivity and provide for animal welfare during periods of feed deficit, particularly when stock are lactating.
- 2.4 Fertiliser application, whether by ground or aerial methods, requires suitable weather conditions that can be spasmodic during critical times such as spring and autumn.
- 2.5 Fertiliser is often stored on farm to ensure it is available so that spasmodic 'weather envelopes' can be optimised.
- 2.6 'Hub airstrips' service multiple properties therefore can be subject to periods of storage that could exceed 28 days, especially during peak periods when suitable weather patterns for operating are spasmodic.
- 2.7 Other district plans that I have been involved with that do not have provisions for managing farm fertiliser storage bins includes:
 - Timaru District Council Decision Version - Draft for Technical Review 3 February 2026
 - Napier City Council Decisions 03 Nov 2025
 - Waitomo District Council Appeals Version 1 October 2025
 - Waimakariri District Council Decisions 14 Jul 2025
 - Gore District Council Decisions 30 Jan 2026
 - Westland Combined TTPP Decisions 16 Dec 2025
 - Wairarapa Combined Decisions Version 8 Oct 2025
 - Selwyn District Council Appeals Version 28 Aug 2024
 - Central Hawkes Bay District Council Appeals 19 Aug 2024
 - Taupo District Council Appeals June 2024 Plan Change 42
 - Wellington City Council 2024 District Plan Appeals 31 Jul 2025

- Mackenzie District Council Plan Change 23 (Rural Zones) Decisions 5th August 2024
- Dunedin City Council Operative 2GP plan 12 September 2023
- Far North District Council PDP Notified PDP 27 July 2023

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



Tony Michelle
Executive Officer
NZ Agricultural Aviation Association