FEEDBACK on

Civil Aviation Authority of New Zealand

SAFETY GUIDELINE FARM AIRSTRIPS AND ASSOCIATED FERTILISER CARTAGE, STORAGE AND APPLICATION (2006)

Date: 15 July 2016
Organisation: Fertiliser Association of New Zealand, (FANZ)
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BACKGROUND and INTRODUCTION :

The Fertiliser Association of New Zealand ("FANZ") is a trade organisation representing its two member companies – Ballance Agri-Nutrients Ltd and Ravensdown Ltd. Both these companies are farmer co-operatives with some 45,000 farmer shareholders. Between them these companies supply over 98% of all fertiliser used in New Zealand.

Aerial application of fertiliser is also provided through subsidiary companies of our member companies. These are Super Air and Aerowork for Ballance Agri-nutrients and Ravensdown respectively.

The Fertiliser Association promotes industry good practices and published the Code of Practice for Nutrient Management. The Association supports and endorses the Fertiliser Quality Council Spreadmark scheme including the Spreadmark Code of Practice incorporating Aerial Spreadmark, and the Fertmark scheme, including the Fertmark Code of Practice for the Sale of Fertiliser in New Zealand. This code was established in 1992 to give New Zealand farmers confidence in the quality of fertilisers and the associated advertising.

The industry also supports the AirCare Accreditation Programme of the New Zealand Agricultural Aviation Association which is a division of the Aviation Industry Association.

SPECIFIC FEEDBACK: (primarily in relation to fertiliser aspects**)**

Feedback is provided in response to the question posted.

1. What are the key industry hazards and risks that you see?

From the perspective of aerial application of fertiliser products, and in relation to the product characteristics, a key requirement is the ability for a pilot to comply with the CAA Rule 137.103 (a)(2). This rule requires that an agricultural aircraft operation in an aeroplane must not take-off at a weight greater than the MCTOW prescribed in the aeroplane's flight manual unless-

(a) [1].....

[2] the aeroplane is equipped with a jettison system that, in accordance with D.5, is capable of discharging not less than 80 percent of the aeroplane's maximum hopper load within five seconds of the pilot initiating the jettison action.

This requirement is supported.

2. How do you manage these key industry hazards and risks?

In relation to providing guidance to assist in the pilot making judgement about being able to comply with the requirement of CAA Rule 137.103 (a)(2), the discussion within the 2006 guidance notes about free- flowing properties on page 14 and 15 is relevant and important.

It is note that on page 15 in the discussion about the fineness of lime there remains reference to outdated regulation:

"previous regulation (then administered by the Ministry of Agriculture and Forestry) controlling the fineness of grinding of agricultural lime to be used for aerial application specified the following:

- at least 95 percent of the ground limestone to pass though a 2.0 mm sieve

- at least 50 percent of the ground limestone to pass though a 0.5 mm sieve"

While the management of fine particles is recognised as an important component of managing risks to flowability, the Fertiliser Association does not consider it helpful to refer to this outdated regulation and particle ranges, which no longer apply in New Zealand.

The requirement to be able to jettison 80 percent of the load is endorsed, and as a guideline for improved flowability characteristic for aerial lime, the Fertiliser Association considers it would be better to refer instead, proactively, to the current Fertmark Code of Practice for product classification and declarations for Agricultural Aerial Lime.

The current Fertmark Code of Practice specifies that for Fertmark accreditation, agricultural aerial lime is:

Ground limestone which has

not less than 95% by weight able to pass through a 2.00 mm sieve, and

not less than 40% by weight able to pass through a 1.0 mm sieve, and

not more than 2.5% able to pass through a 0.5 mm sieve

Although the above guidelines and product declarations for Fertmark may be amended, as required, as new information becomes available, the Fertiliser Association considers the Fertmark Code of Practice product classifications provide a much better guideline reference to the text currently on page 15 of the Guideline document.

The reference on page 15 to the outdated MAF regulation and particle ranges for lime should be deleted, and instead, insert reference to using Fertmark accredited "agricultural aerial lime". It may not be appropriate to specify the current particle size ranges lest they are modified and changed, but support for the current Fertmark accredited agricultural aerial lime should provide appropriate guidance at all times.

3. What things do you think should be covered by the guide?

To support pilots in making the appropriate judgements, support is given to the document providing guidance on hazard and risk notification requirements for farmers, property owners and contractors. It is recognised this is a two way requirement.

4. What elements of the existing guide did you find useful?

The layout and boxed text to highlight key information is helpful. Cross referencing key information within the document is helpful.

5. What elements were not useful?

Nothing to add

6. What new developments do you feel should be included (technological or otherwise)?

Specifically in relation to fertiliser and lime product characteristics, and to support pilots in making appropriate judgements, guidance on standardised pre-fight tests for pilot assessment of the flowability and moisture levels of product prior to loading is supported. It is recognised that even though good systems are in place to protect the integrity of product, sometimes product deterioration due to moisture or other factors may impact on flowability characteristics. Guidance for pilots and contractors for standardised product assessment prior to loading is considered desirable.

7. Please suggest any key templates or forms that would be useful.

Referencing current Codes of Practice and Industry good documents will be helpful, such as those cited in the introduction to this submission:

- Code of Practice for Nutrient Management
- Spreadmark Code of Practice, incorporating Aerial Spreadmark Code of Practice
- Fertmark Code of Practice for the Sale of Fertiliser in New Zealand
- AirCare Accreditation Programme

A hazards and risk template may be helpful

Thank you for the opportunity to comment.

End