



Soil & Health Association (Est. 1941)

Healthy Soil, Healthy Food, Healthy People

Kia ora Parliamentary Commissioner for the Environment,

I am writing on behalf of the Soil & Health Association of New Zealand to draw your attention to the resumption of herbicide spraying at Te Henga Wetland (West Auckland), including reports of drone application, and to request your office's consideration of the issues this raises for wetland protection and good practice.

Soil & Health has prepared a short technical review focused on the reported use of a glyphosate formulation (Polaris 450) together with a surfactant adjuvant (Aquakynde), and on the exposure pathways and ecological risks that arise when agrichemicals are applied in or immediately adjacent to wetland waters. The review also summarises the relevant hazardous substances controls and local planning expectations for agrichemical use around sensitive receiving environments.

We appreciate that your office is not an enforcement agency. Our request is for independent scrutiny and, where appropriate, sector-wide guidance that can lift practice and reduce the likelihood of repeat harm in wetlands nationally. Specifically, we respectfully request that the Parliamentary Commissioner for the Environment consider:

1. Whether the Te Henga operation, as designed and implemented, is consistent with the controls and intent of New Zealand's hazardous substances framework for agrichemical use near or over water, and with the risk management approach expected for wetlands as sensitive receiving environments.
2. Whether there is a need for clearer, nationally consistent guidance for councils and operational agencies on the minimum protections expected for wetlands, including the hierarchy of preferred pest plant control methods in wet environments and the circumstances in which herbicide use may be justified.
3. Whether agrichemical mixture risks in wet environments, including the use of added surfactants and co-formulants, are being adequately considered in operational decision-making, and what practical safeguards should be standard.
4. Whether baseline and follow-up monitoring should be expected as a matter of good practice when herbicides are applied in wetland settings, so decisions can be tested against evidence and adverse outcomes detected early.

We attach our technical review for your consideration. We would welcome the opportunity to briefly discuss the substance of the paper with your office, and to provide any additional context that would be helpful.

Ngā mihi nui,

Charles Hyland

Chair

Soil & Health Association of New Zealand

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