

**SUBMISSION ON**  
**Ministry of Economic Development:**  
**EMC Compliance Proposed Code of Practice for the Supply,**  
**Installation and Operation of Power Drive Systems**  
**(Variable Speed Drives)**

*Date* 26/09/11  
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INZ (Irrigation New Zealand Inc.) wishes to be heard in support of its submission. However, if others make a similar submission we are happy to present jointly.



**(Andrew Curtis CEO Irrigation NZ)**

**Overview**

IrrigationNZ (INZ) is a national body that promotes excellence in irrigation throughout New Zealand (NZ). INZ is a national organisation that represents the interests of over 3,600 irrigators totaling 350,000ha of irrigation (approximately 56% of NZ's irrigated area). All the key irrigation service providers (over 130 service companies including suppliers, designers, installers and consultants) are also members.

**SUBMISSION**

1. Irrigation NZ strongly supports the need for a Code of Practice (CoP) for the Supply Installation & Operation of Power Drive Systems (Power Speed Drives). There are many issues that have arisen over recent years which could have been avoided through the adoption of this CoP.
2. Irrigation NZ supports the statement that the new requirements of the CoP should apply to installations from 1<sup>st</sup> December 2012. However, if the CoP is not operative at this date, the date must be changed accordingly (the date from which the CoP becomes operative).

*Note: It is likely beyond the scope of the CoP, however, there is also a need for MED to show leadership and facilitate a consistent approach to rectifying existing installation issues (those outside the scope of existing regulations but inside the scope of the proposed CoP). At present there is much variation, some lines companies have adopted a draconian authoritarian approach whereas others have partnered with operators to rectify the issues. The latter is the way forward given the lack of clear direction prior to this CoP.*

3. As stated in the CoP, a PDS is a complex device. Greater accountability must therefore be placed upon the supplier / installer to provide accurate site specific installation instructions. It must be recognised that many operators are technically unaware (it is not their core business) of the installation and operational issues that a Power Drive System can create.
4. The content of the installation instructions is clear however the form and use of them is not. INZ recommends a consistent 'installation instruction checklist' is developed (an Annex of the CoP) and given effect to in the CoP. This will avoid potential confusion and thus give greater certainty to potential operators.
5. An 'installation instruction checklist' must be completed by the supplier / installer and provided to the potential operator as part of the quotation process and finalised prior to the actual installation - effectively becoming the, or a part of the, installation contract. The checklist must provide specifications and demonstrate how the supplier / installer has accounted for the site specific non-compliance risks with both existing regulations and the CoP.
6. To foster greater understanding by potential operators a 'layman's' guide to the CoP must also be provided alongside the installation instructions.
7. INZ wishes to work with MED on the production of both the above documents as they would be of significant benefit to its membership.
8. Such an approach is particularly important if 'competent' PDS professional persons and organisations are to be given greater scope to determine interference levels permitted within their own environments. For example, in the case of the Irrigation Design CoP a suggested range is given for many of the design parameters, recognising different environments require different solutions. However, if the design falls outside these ranges, justification must then be given as to why this was and how the design will still achieve regulatory requirements, such as permit conditions.

**INZ Submission Ends**