

## APP201045 Summary of Submissions

### Reassessment of organophosphate and carbamate based insecticides

Submission #	Submitter	Organisation	Submission Content	Wishes to be heard?
102636	Chris Dolman	BOC Ltd	<b>The submitter supports the application.</b> The submitter notes that dichlorvos is effective for the control of pests in storage facilities such as warehouses, asparagus, flour mills and grain storage areas. Very few chemicals have such a broad spectrum of insect control. The PPE for dichlorvos should be updated along with re-entry periods for bystanders, enabling dichlorvos to be used safely. Industry is willing to work with the EPA to ensure a decision is made that meets the needs of industry as well as enabling safe work practices.	Yes
102639	Phil Sayer	Garrards Pty Ltd	<b>The submitter neither supports nor opposes the application.</b> The submitter notes that one of the substances under review, Ficam W (Wettable powder containing 800 g/kg bendiocarb; HSR000451) is used by urban professional pest managers. As the current reassessment does not include uses of OPCs in veterinary medicines or for industrial or public health purposes, the submitter requests that any phase-out or change to the HSNO approval of this substance should only be considered after consultation with the pest management industry.	No
102643	Wayne Copland	NC MS Copland Ltd	<b>The submitter opposes the application.</b> New Zealand farmers need a range of chemicals to control pests and avoid resistance. These pests include potato psyllid, grass grub and other insects in pasture and other crops. The submitter notes the benefits for economy of the substances in pest control and damage that can occur if not available. The submitter wishes the EPA to make some rules around use and make the chemical companies responsible to make sure it is used properly.	No
102653	James Mitchell	Northland Regional	<b>The submitter neither supports nor opposes the application.</b> Northland Regional Council	No

		Council	request that the EPA introduce a staged withdrawal of approvals, and implement a subsidising policy to avoid inappropriate and unacceptable disposal. NRC notes how it was affected by ERMA's endosulfan reassessment and highlights the importance of post-decision communication.	
102654	Christopher Hall	Kings Plant Barn	<p><b>The submitter neither supports nor opposes the application.</b> The submitter opposes many of the controls as these are considered to be unnecessary, not practical and unlikely to be complied with. Specifically the approved handler requirement, buffer zones, notification of neighbours and Re-Entry Intervals (REIs).</p> <p>The submitter suggests alternative controls such as extra labelling requirements and requiring that all people who sell OPCs are approved handlers or Growsafe approved.</p> <p>The submitter has data to show that OPCs are a small percentage of all poisonings and that other types of chemicals pose higher risks. The submitter believes that OPCs are very important for home garden users which results in significant benefits to the economy and society. There are few registered alternatives to OPCs.</p>	Yes
102655	Roelf Schreuder	NZ Gourmet Ltd	<p><b>The submitter opposes the application.</b> The submitter opposes the application. The submitter opposes the recommendation made by the EPA in the application for Dichlorvos. Dichlorvos is important for greenhouse crops in general and especially the submitter's capsicum exporting business.</p>	Yes
102656	Dean Kelly	Fish & Game NZ – West Coast	<p><b>The submitter opposes the application.</b> The submitter requests that the EPA revoke approval for all plant protection insecticides containing diazinon for all areas where gamebirds cannot be effectively withheld..</p>	No
102657	Garry Stone	Palmers Franchise Systems Limited	See Kings Plant Barn submission 102654.	Yes

102658	Meriel Watts	Pesticide Action Network Aotearoa New Zealand (PAN ANZ)	<p><b>The submitter neither supports nor opposes the application.</b></p> <p>The submitter supports some proposals made by EPA and opposes others.</p> <p>Opposes the retention of the following approvals and requests phase-out: acephate, carbaryl, chlorpyrifos, chlorpyrifos-methyl, methomyl and pirimicarb.</p> <p>Submitter supports proposals for phase-out made in relation to bendiocarb, benomyl, carbofuran, carbosulfan, dichlofenthion, ethion, famphur, isazofos, omethoate, phoxim and pyrazophos.</p> <p>Submitter supports proposals for phase-out made in relation to following substances but proposes shorter phase out periods: diazinon, dimethoate, fenitrothion, methamidophos, phorate, prothiophos, terbufos.</p> <p>Submitter supports some retained uses as follows: dichlorvos (Retain biosecurity strips), fenamiphos (Retain biosecurity baits); maldison (Retain biosecurity baits); pirimiphos methyl (Retain for empty grain silos and outdoor biosecurity); oxamyl (Retain glasshouse use).</p> <p>Home use should be phased out within 1 month rather than 18 months.</p> <p>Submitter notes that International obligations relating to chlorpyrifos may be triggered by a listing under the Stockholm Convention on persistent organic pollutants</p>	Yes
102659	Bill Brett Ltd	On behalf of 13 independent garden centres	<p><b>The submitter neither supports nor opposes the application.</b> The submitter opposes many of the controls as these are considered to be unnecessary, not practical and unlikely to be complied with. Specifically the approved handler requirement, buffer zones, notification of neighbours and Re-Entry Intervals (REIs).</p> <p>The submitter suggests alternative controls such as extra labelling requirements and requiring that all people who sell OPCs are approved handlers or Growsafe approved.</p> <p>The submitter has data to show that OPCs are a small percentage of all poisonings and that other</p>	Yes

			types of chemicals pose higher risks. The submitter believes that OPCs are very important for home garden users which results in significant benefits to the economy and society. There are few registered alternatives to OPCs.	
102660	Bill Brett Ltd	On behalf of home gardeners	As above	Yes
102661	John Liddle	Nursery and Garden Association of New Zealand (NGINZ)	<p><b>The submitter neither supports nor opposes the application.</b> NGINZ raises concerns over the reliance upon data on poisoning incidents in New Zealand. Submits that OPCs are the most effective group of insecticides and as such offer significant benefits to home gardeners, and therefore society and the community.</p> <p>NGINZ support continued off label use. Support use of OPCs in biosecurity. Disagree with the proposed approved handler, buffer zone and restricted entry interval controls as these are unnecessary given the low concentrations and small amounts of active ingredient used. Support restrictions on pack size, active ingredient concentration and child proof packaging and the introduction of certification of staff at point of sale. Support the 10 year phase out of diazinon (but without some of the EPA's proposed controls). Have attached a paper <i>"Economic, Environmental, and Health/Well-Being Benefits Associated with Green Industry Products and Services."</i></p>	Yes
102662	Nikki Johnson	Market Access Solutionz (MAS)	<p><b>The submitter neither supports nor opposes the application.</b> The submitter has made the submission on behalf of the Foundation for Arable Research and 11 product groups affiliated to Horticulture New Zealand. The submission provides detailed analysis of EPA proposal and proposed alternative controls for some substances. Key aspects of the submission relate to the following topics:</p> <ul style="list-style-type: none"> <li>• The setting of Acceptable Daily Intake (ADI) values, and the impacts of selection of those values</li> </ul>	Yes

			<ul style="list-style-type: none"> <li>• Feedback from industry on the proposed additional controls and regulatory recommendations</li> <li>• Provision of information relating to benefits associated various crop sectors</li> </ul> <p>Inclusion of a review period for phase-out of critical use substances, such as diazinon and methamidophos.</p>	
102663	Fiona McTavish	Bay of Plenty Regional Council (BoPRC)	<b>The submitter neither supports nor opposes the application.</b> BoPRC provides clarification on poisoning incidents and provides comments on the phase-out periods, controls and home garden use for EPA to consider.	Yes
102664	Dr Roger Blakeley	Auckland Council	<b>The submitter generally supports the application.</b> Auckland Council provides comments on phase in/phase out times, the approved handler scheme and concerns about the use of surfactants and the impact that this has on human health and the environment for the EPA to consider	Yes
102665	Natalie Chrystal	Animal Remedy and Plant Protectant Association (ARPPA)	<p><b>The submitter generally supports the application with some exceptions.</b> ARPPA Supports the retention of the majority of the substances covered by the reassessment with some controls listed in the submission.</p> <p>Supports the proposals to retain acephate, carbaryl, chlorpyrifos, maldison, pirimicarb, pirimiphos methyl.</p> <p>Concerned about the phase-out period of 10 years for diazinon, particularly as it is proposed that the approvals for phorate and terbufos are revoked, leaving no alternative for grass grub control. Submits no revocation should be recommended until a viable alternative is identified and review of progress should be recommended at 5 years.</p> <p>Concerned about the proposed phase-out of dimethoate, as ARPPA is of the view that the benefits of this substance for use on fodder, forage and arable crops has been underestimated. It is the only</p>	Yes

			<p>systemic aphicide registered. ARPPA note that this product is used for similar uses in North America and Europe.</p> <p>Concerned about the proposed phase-out period of 10 years for prothiofos, as it is critical for the control of mealy bugs in vineyards. While there are some potential alternatives these are not well accepted and removal of the prothiofos approval should not occur until a viable alternative control option is identified and review of progress should be recommended at 5 years.</p> <p>Concerned about the selection of some of the ADI values listed and lack of justification.</p>	
102666	Narandra Patel	Gourmet Blueberries Ltd	<p><b>The submitter is opposed to the application.</b></p> <p>The submitter supports the maintenance of chlorpyrifos on blueberry plants as a post-harvest spray and as a pre-plant granule application for blue berry farming. The submitter considers chlorpyrifos the only substance that is effective in high organic content soil against grass grub and various weevils. Biological alternatives are no longer available. Chemical alternatives, such as diazinon, are ineffective.</p> <p>The submitter considers that removal of chlorpyrifos products will impact on the New Zealand blueberry industry, limiting expansion and potentially leading to decline.</p>	Yes
102667	Michelle Hickman	Syngenta Crop Protection	<p><b>The submitter neither supports nor opposes the application.</b> The submitter gives comments on controls R-1, R-4, R-8, R-9, R-10, R-12 and R-13. The submitter would like a longer phase in of the controls to accommodate labelling changes. The submitter seeks clarification about some of the new EPA controls.</p>	No
102668	Robert Sowman	Fish and Game Council of New Zealand	<p><b>The submitter opposes the application.</b> Fish and Game strongly oppose the continued application in New Zealand of Diazinon. It is aware of numerous complaints received over the past decade involving the poisoning of waterfowl subsequent to treatment of pesticides for grass grub and other pests. F&amp;GNZ is strongly of the opinion that population declines and extensive mortality of</p>	No

			birds strongly indicate that the health of the environment, and thus the health of organisms that depend on it, suffers due to the prevalence of pesticides. Although organophosphate and carbamate compounds are not as persistent as the organochlorines, they are much more acutely toxic, which means that even very small amounts can cause severe poisoning.	
102669	Maurizio Rocchetti	Gourmet Paprika	<p><b>The submitter neither supports nor opposes the application.</b> Supports maintaining the use of chlorpyrifos in both forms (granule and emulsifiable concentrate) on pasture and horticultural industries for controlling grass grubs.</p> <p>Submits that use can be limited to crop establishment for granule formulation or to ground application through boom spray or irrigation system to minimize drift and operator exposure.</p>	No
102670	Julian Williams, Terina Rakena	Waikato Tainui River Trust	<p><b>The submitter supports the application.</b> Submitter supports the recommendations to revoke substances containing 19 of the OPC substances, and retain substances containing 10 of the OPC substances. The submitter recommends a more holistic approach to the development and management of biosecurity and pest management, and considers that the EPA should consider the environment as a whole, and in future assessments, should take into account the long-term risks, costs and benefits.</p>	Yes
102671	Chris Houston/ Catharine Sayer	Beef + Lamb NZ /, Deer Industry New Zealand	<p><b>The submitters neither support nor oppose the application.</b> The submitters strongly support the proposal to retain the approval of substances containing chlorpyrifos with enhanced controls. They oppose the recommendation to phase out approval for substances containing diazinon. The submitters also comment on the EPA's recommendations for the other substances under review, agreeing in some cases (carbaryl, dichlorvos, fenamiphos, maldison, methamidophos, methomyl, oxamyl and pirimicarb) and disagreeing in others (carbofuran, dimethoate, fenitrothion and pirimiphos-methyl). The submitters also recommend that the EPA delays its final decision until the UK Committee on Toxicity's review of epidemiological evidence on the health effects of chronic</p>	Yes

			exposure to organophosphates is completed	
102672	Ann Thompson	Federated Farmers	<b>The submitter neither supports nor opposes the application.</b> The submission from Federated Farmers is based on a survey of its members. It supports some of the draft recommendations (e.g. withdrawal from the market of dimethoate, fenitrothion and terbufos), and opposes others (e.g. the proposal to phase out outdoor use of dichlorvos and pirimiphos-methyl). It recommends that the EPA reviews the use of diazinon, fenamiphos and methamidophos two years before the suggested phase-out time.	Yes
102673	Debbie Morris	Ministry for Primary Industries	<b>The submitter neither supports nor opposes the application.</b> The submitter highlights the effects of the recommendations on three areas that impact the work of MPI: food residues, pest response and plant importation. The submitter highlights that sufficient OPC substances must be retained within the toolbox for incursion response and plant import pest treatments.	Yes
102674	Elizabeth Dixon	Dairy NZ	<b>The submitter neither supports nor opposes the application.</b> Dairy NZ generally supports the EPA's proposed controls although they believe that substances should not be phased out unless there are alternative options available. OPCs should wherever possible be retained for biosecurity purposes. Dairy NZ provides additional benefits information based on the links between the pastoral sector and the fodder/forage sector. Some of the recommendations for actives used in these sectors may directly affect the pastoral sector increasing farmer's costs. Dairy NZ do not support the revocation of the approvals for the unused substances revoked, as they might be useful for future biosecurity emergencies. Dairy NZ have concerns about the reassessment process, in particular the amount of evidence of adverse effects and the burden that has been placed on the primary sector	Yes
102675	Colin Sharpe	DOW AgroSciences	<b>The submitter supports the application.</b> The submitter's comments focus on chlorpyrifos uses as a spray and chlorpyrifos-methyl. The submitter supports the application and wishes for the current EPA approvals for substances containing chlorpyrifos or chlorpyrifos-methyl to be retained, albeit with additional or amended controls. Dow AgroSciences recommends that the EPA should	Yes

			reconsider the risks to birds from chlorpyrifos based on the extensive field studies provided. They also commented on controls such as buffer zones, spray quality for aerial application, application rate, notification and transportation and Personal Protective Equipment.	
102676	Simon Terry	NZ Sustainability Council	<p><b>The submitter neither supports nor opposes the application.</b></p> <p>The Sustainability Council suggests different approaches and gives detailed recommendations on group standard and re-assessment policies. The submitter suggests a reassessment of organochlorines before that for organophosphates.</p> <p>The submitter notes that the EPA have not assessed chronic environmental risks; have systematically underestimated exposure (excluded some exposure pathways, the EPA have always assumed proper use of the substances); have not presented risk but uncertainty; have ignored the synergistic effects of OPs; and have ignored some sources of uncertainty. The EPA has ignored the precautionary principle and section 7 of the HSNO Act.</p> <p>Additional research is attached with the submission:</p> <ul style="list-style-type: none"> <li>• Ismail, A. A.; <i>et al.</i>, Neurobehavioral performance among Agricultural workers and pesticide applicators: a meta-analytical study. <i>Occup Environ Med</i> 2012 69: 457-464, January 19, 2012.</li> <li>• Gallagher, M.M <i>et al.</i>, Suicide and Occupation in New Zealand, -2001 - 2005. <i>Int. J Environ. Health</i>, 2007; 14: 44-49</li> <li>• MacKenzie R, <i>et al.</i>, <i>Neurobehavioral problems following low-level exposure to organophosphate pesticides: a systematic and meta-analytic review</i>, <i>Critical Reviews in Toxicology</i>, 2013; 43(1): 21–44 2013.</li> </ul> <p>The submission attaches the Sustainability Council's report to a Parliamentary Committee</p>	Yes

			from 2005.	
102677	Noelene Davis	Cheminova	<p><b>The submitter neither supports nor opposes the application.</b> Cheminova submit that the risk assessment has over estimated risk as there are very few reported acute incidents involving OPCs. Submits that benefits have been underestimated especially for resistance management. Opposes removal of Dimethoate due to use by the fodder and forage sector. Submits that the assumptions about dermal absorption are overly conservative leading to high risk quotients.</p> <p>Submitter notes Acephate is a potential alternative to methamidophos and may be helpful for use against TPP.</p> <p>Notes that the grape sector already has measures in place to reduce risks from prothiofos and the proposed extra controls will further mitigate risks. Prothiofos will still be required for use in a program with other chemistry for mealy bug control. This active is critical as a resistance management tool allowing true alternation.</p>	Yes
102678	Matthew Dolan	New Zealand Agrichemical Education Trust (NZAT)	<p><b>The submitter supports the application.</b> NZAT supports a focus on good practice to manage risks associated with the use of OPCs, but believes that many of the practices should be the expected standard for all agrichemical compounds classified as hazardous substances. The submitter recommends that the controls for personal protective equipment (PPE) and notification be consistent with those in NZS8409, and that signage is required for both indoor and outdoor use of OPCs. The submitter also comments on the Approved Handler system.</p>	Yes
102679	Richard Donald	Richard Donald	<p><b>The submitter did not indicate whether the application is supported or opposed.</b> The submitter provides recommendation on the implementation of controls and on the approved handler regime. The submission refers to NZS 8409; 2004 Appendix M and notes that the notification requirements are not widely followed.</p>	Yes

102680	Roger Parton	Rural Contractors New Zealand	<p><b>The submitter did not indicate whether the application is supported or opposed.</b></p> <p>The submitter provides annual usage data for its contractors for a number of OP and carbamate substances. Notes there are no current alternatives for diazinon and pirimiphos-methyl. Submitter agrees proper controls are needed, but would be concerned if the substances were made unavailable in the market. The submitter highlights the need for appropriate handling standards for these substances</p>	Yes
102681	Alan Cliffe	Nufarm	<p><b>The submitter opposes the application.</b> Rejects the proposal to limit pirimiphos-methyl to indoor use only. Submits the EPA have underestimated the benefits associated with outdoor uses and provides additional benefits information. Notes a lack of reports of bird incidents following use of pirimiphos-methyl. Suggests use scenarios for pirimiphos-methyl are not accurate and need to be revised.</p> <p>Agrees with some of the controls (e.g. labelling requirements, approved handler, re-entry intervals).</p> <p>Disagrees with other proposed controls (e.g. buffer zones, droplet size, use rates, phase in and phase out periods).</p>	Yes
102682	Brian Riley	Brian Riley Orchards Limited	<p><b>The submitter opposes the application.</b> Submitter grows kiwifruit, citrus and tamarillos and has been using Diazinon for 25 years. Notes it is good for controlling thrips. Notes alternatives to Diazinon are likely to be more expensive.</p>	No
102684	Richard Ball	Te Rūnanga O Ngāi Tahu	<p><b>The submitter generally supports the application.</b> Submitter supports the recommendations to revoke substances containing 19 of the OPC substances, and retain substances containing 10 of the OPC substances. Submitter notes the EPA have not assessed chronic risks and that the EPA should consider the environment as a whole with particular emphasis on mahinga kai. Submitter has specific comments on acephate, carbaryl, chlorpyrifos, diazinon and recommends additional label warnings and education for Māori on risks of OPCs collected in areas adjoining sprayed areas.</p>	Yes

