

11 December 2013

Graham Young
Environmental Protection Authority
Private Bag 63002
Wellington 6140

By email: Graham.Young2@epa.govt.nz

Dear Mr Young

**New Zealand Plant Breeding and Research Association submission on the
Application for fungus to protect annual cereal crops (APP201774)**

I am writing on behalf of the New Zealand Plant Breeding and Research Association in response to the Environmental Protection Authority invitation to the public to make submissions on the Application for fungus to protect annual cereal crops (APP 201774).

The Association represents plant breeders, intellectual property owners and marketers of proprietary seed.

The Association's members include: Cropmark Seeds Ltd, DLF Seeds Ltd, Genetic Technologies Ltd, Germinal Seeds NZ Ltd, Grasslanz Technology Ltd, New Zealand Agriseeds Ltd, PGG Wrightson Seeds Ltd and Seed Force Ltd.

The Association is an active champion of a regulatory environment favourable to research into, development of and trialling of new plant technology considered to be of potential benefit to New Zealand primary industries. The Association also champions greater freedom to import and use new plant material, within the boundaries of New Zealand's biosecurity measures, that is not detrimental to this country's human health, environment or international obligations and is considered to be of potential benefit to the New Zealand primary sector.

The Association supports the Application (APP 201774)

The Association wishes to express its support for the Application (APP 201774) made by Grasslanz Technology Ltd and AgResearch Ltd.

The Association considers that the release of the endophytic fungus, *Epichloe/Neotyphodium* could confer important advantages for cereal crops against insect pests, disease and drought.

The endophyte genus *Neotyphodium* has already proven to be of significant economic benefit to New Zealand farmers through enhanced pasture productivity and animal performance. Use of *Epichloe/Neotyphodium* in cereal crops has the potential to continue improving New Zealand production as well as reducing pesticide use.

The *Neotyphodium* genus that a number of our members are researching is contained within the host plant. Transfer from the host to other plants is considered extremely unlikely under natural conditions and only occurs in the laboratory with considerable difficulty.

The Association urges the EPA to seriously consider and approve the release of *Epichloe/Neotyphodium*.

Yours sincerely

Thomas Chin
General Manager

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