

He tono nā



Te Rūnanga o NGĀI TAHU

ki te

ENVIRONMENTAL PROTECTION AUTHORITY

e pā ana ki te

**SUBMISSION ON APP202098 – Reassess chlorpyrifos,
diazanone, carbaryl non-plant protection products**

October 2015

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We do not wish to be heard
unless a hearing is convened at the request of other parties.

1. EXECUTIVE SUMMARY

Te Rūnanga o Ngāi Tahu supports the phasing out of all products containing chlorpyrifos, diazanon and carbaryl with the exception of the ear drop product for cats and dogs.

We suggest that the Environmental Protection Authority draw to the attention of the farming and shearing industry groups the possibility of long-term 'legacy' effects on human health revealed by the risk analysis included in this application.

2. TE RŪNANGA O NGĀI TAHU

This response is made on behalf of Te Rūnanga o Ngāi Tahu (Te Rūnanga). Te Rūnanga is statutorily recognised as the representative tribal body of Ngāi Tahu Whānui and was established as a body corporate on 24th April 1996 under section 6 of Te Rūnanga o Ngāi Tahu Act 1996 (the Act). We note the following relevant provisions of our constitutional documents:

- (a) Section 3 of the Act States:
This Act binds the Crown and every person (including any body politic or corporate) whose rights are affected by any provisions of this Act.
- (b) Section 15(1) of the Act states:
Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui.
- (c) The Charter of Te Rūnanga o Ngāi Tahu (1993, as amended) constitutes Te Rūnanga as the kaitiaki of the tribal interest.

Te Rūnanga respectfully requests that this response is accorded the status and weight due to the tribal collective, Ngāi Tahu Whānui, currently comprising over 49,000 members registered in accordance with section 8 of the Act .

3. TE RŪNANGA STATEMENTS OF POSITION ON APP202098

Te Rūnanga o Ngāi Tahu (TRoNT) has participated in all the Environmental Protection Authority's deliberations regarding carbonate and organophosphate-containing products. This reassessment application which focuses on non-plant protection uses/products, principally veterinary medicines, concludes this important series of reassessments. TRoNT has an underlying commitment to the reduction of hazardous chemicals in the environment and our submissions always embody this principle. For this reason, TRoNT fully supports the

applicant's risk, cost and benefits assessments and the conclusion that approvals for all of the remaining chlorpyrifos, diazanon and carbaryl-containing products on the market, with the exception of eardrops for cats and dogs be revoked.

3.1 Environmental risk assessment

TRoNT fully supports the environmental risk assessment undertaken by the EPA. However, we note that the risk of environmental or other risk resulting from the disposal of used/broken/fallen off flea collars is not mentioned. We do not know how significant this risk would be, but given that it may well occur in a domestic setting it should have at least been acknowledged.

3.2 Relationship of Māori to the environment

TRoNT wishes to congratulate the EPA for the comprehensive and in-depth risk analysis included in this application. It is a model which other applicants, especially in the agrichemicals industry, could follow and well fully support the conclusions that are reached.

3.3 Legacy effects of past exposure

It does strike us that those in the sheep farming and shearing industries, who have been exposed to diazanon for perhaps years, should be advised of the human health risk analyses undertaken by the EPA for this reassessment. Certainly, Māori comprise a significant proportion of those involved in the shearing industry; at the least we think that through their industry bodies these occupational groups should be appraised of possible legacy effects from years of past exposure to levels of diazanon which could impair their health. Anecdotal information regarding past practices in and around sheep dipping and subsequent shearing would indicate that at least some of those farm workers and shearers involved might suffer from the health effects of longstanding, chronic, exposure to diazanon.

It is our view that all reassessment applications should acknowledge and direct the attention of industry or other bodies to the effects of past exposure to hazardous chemicals.

4. RECOMMENDATION

Te Rūnanga o Ngāi Tahu fully supports the application. We also recommend that the EPA direct the attention of the farming and shearing sectors to the effects of past exposure to hazardous substances, particularly diazanon, revealed by the risk analysis of this application. We further urge that consideration of such 'legacy effects' be included in all future reassessment applications.