

# SUBMISSION

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To: Environment Protection Authority

Submission on: Reassessment of chlorpyrophos, diazinon and carbaryl; APP 202098

From: Federated Farmers of New Zealand

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**SUBMISSION  
REASSESSMENT OF CHLORPYROPHOS, DIAZINON AND CARBARYL  
APP202098**

**1. SUBMISSION**

- 1.1. Federated Farmers does not object to the Environmental Protection Authority's (EPA) proposal to revoke approvals for chlorpyrophos and diazinon for use as veterinary medicines, as set out in APP202098. We note that Xterminate 10 and Strike Powder are no longer available, and keeping TopClip 40 available does not make sense given it would remain the only product in this class.
- 1.2. Federated Farmers accepts the research carried out by AgResearch which supports this proposal. Farmers will have alternatives that, while possibly more expensive, will manage ectoparasites adequately.
- 1.3. In our previous submissions on organophosphates and carbamates, Federated Farmers has accepted there are health risks associated with these agrichemicals.
- 1.4. Federated Farmers will make no comment on the use of carbaryl or chlorpyrophos (as 'other' pesticide use), leaving it up to the pest extermination industry and horticulture sector for comment.
- 1.5. Federated Farmers will make no comment on the use of diazinon as flea treatment for cats and dogs.

**2. ABOUT FEDERATED FARMERS**

- 2.1. Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.
- 2.2. The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
  - Our members may operate their business in a fair and flexible commercial environment;
  - Our members' families and their staff have access to services essential to the needs of the rural community; and
  - Our members adopt responsible management and environmental practices.