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Send by post to: Environmental Protection Authority, Private Bag 63002, Wellington 6140

OR email to: submissions@epa.govt.nz

Once your submission has been received the submission becomes a public document and may be made publicly available to anyone who requests it. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.

Submission on application number:	APP202098
Name of submitter or contact for joint submission:	Chris Houston
Organisation name (if on behalf of an organisation):	Beef + Lamb New Zealand Ltd
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I wish to keep my contact details confidential

The EPA will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. We will use your contact details for the purposes of processing the application that it relates to (or in exceptional situations for other reasons permitted under the Privacy Act 1993). Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above. We may also use your contact details for the purpose of requesting your participation in customer surveys.

The EPA is likely to post your submission on its website at www.epa.govt.nz. We also may make your submission available in response to a request under the Official Information Act 1982.

- I support the application
- I oppose the application
- I neither support or oppose the application

The reasons for making my submission are¹:

Who we are:

Beef + Lamb New Zealand (B+LNZ) is the farmer-owned organisation representing New Zealand's sheep and beef farmers. B+LNZ is funded under the Commodities Levies Act 1990 through a levy paid by producers on all cattle and sheep commercially slaughtered in New Zealand.

B+LNZ represent 12,300 commercial sheep and beef farming businesses. The value of the New Zealand red meat sector is around NZ\$8.5 billion (for 2013-2014). The red meat sector is New Zealand's second largest export earner.

B+LNZ's purpose is to help sheep and beef farmers make informed business decisions and promote their collective interests.

B+LNZ's priorities are to invest in research and development that meets the needs of the farmers and the sector, develop farm and farmer capability and deliver knowledge that drives farm performance. B+LNZ actively promotes collective interests through attracting and retaining talent for the sector, supporting the sector's market opportunities, advocating for farmers ability to operate and building the sector's confidence and profile.

Why we are commenting:

B+LNZ's interest in this application is primarily focussed on the proposed withdrawal of approval of diazinon for the control of ectoparasites in sheep, which is necessary to limit the production limiting impacts of these pests and to mitigate consequences for the welfare of infested animals.

- I wish to be heard in support of my submission (this means that you can speak at the hearing)
- I do not wish to be heard in support of my submission (this means that you cannot speak at the hearing)

I wish for the EPA to make the following decision:

B+LNZ does not object to the withdrawal of approval of these compounds.

B+LNZ accepts that there are risks to human health and the environment associated with use of diazinon.

B+LNZ is unconvinced by the NZIER coverage of trade impacts and, in particular, have concerns about the suggestion that New Zealand is a 'policy taker'. New Zealand's economic prosperity is dependent upon free trade, underpinned by robust international standards that are proportionate and based on science. For a Government agency (albeit indirectly via a report prepared by a third party at its request) to publicly acknowledge that any other situation is in existence, tenable or acceptable is unwise and risks becoming self-fulfilling.

B+LNZ is satisfied by the analyses undertaken by AgResearch that demonstrates that suitable and effective alternatives exist for the control of ectoparasites in sheep. We note that these may be marginally more costly but are persuaded that any increase in farmer operating costs will be adequately balanced by the reduction in risks from acute exposure and potential environmental impacts.

B+LNZ makes these comments on the understanding that the EPA has no intention of seeking to withdraw approval for any of the alternative control tools listed in Table 5 (except chloropyrifos) in Pfeffer and Heath (2010), reproduced by NZIER (2015).

¹ Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.

