

# SUBMISSION FORM

**Once you have completed this form**

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

**OR email to:** [submissions@epa.govt.nz](mailto: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.**

<b>Submission on application number:</b>	APP202098 CCD
<b>Name of submitter or contact for joint submission:</b>	Philippa Gibson
<b>Organisation name (if on behalf of an organisation):</b>	Worksafe New Zealand
<b>Postal address:</b>	██████████ ██████████
<b>Telephone number:</b>	██████████
<b>Email:</b>	████████████████████

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](http://www.epa.govt.nz). We also may make your submission available in response to a request under the Official Information Act 1982.

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

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**The reasons for making my submission are<sup>1</sup>:**

Worksafe New Zealand supports the proposal to revoke approvals for the substances no longer manufactured or imported.

Worksafe New Zealand supports revoking approval for Top Clip 40 (HSR001953) based on the results of the risk assessment carried out by the Agency, and limitations to risk mitigation. Revocation of approval is in line with the principals of health and safety legislation, and health and safety good practice, that is, to firstly eliminate a significant hazard where practicable.

Worksafe New Zealand supports the retention of the approval for Fido's Ear Drops (HSR 001825) based on the results of the risk assessment carried out by the Agency, and supports the proposed variations to the controls.

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- 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)

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**I wish for the EPA to make the following decision:**

Decision in line with the Agency's proposals in the application with consideration of comments in the attached document from Worksafe New Zealand.

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<sup>1</sup> 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.



Appended document for the Worksafe New Zealand submission on the application for the reassessment of carbaryl, chlorpyrifos and diazinon used in veterinary medicines and for other non-plant protection uses - APP202098.

Date of submission: 8 September 2015

General	Submission
	<p>Worksafe New Zealand</p> <ul style="list-style-type: none"> <li>• supports the application however provides some suggested changes to additional controls as discussed below,</li> <li>• has based its submission on the EPA reassessment application of 11 August 2015. If the proposed controls or approvals change, Worksafe New Zealand would like further opportunity to provide input.</li> </ul>
Phase out period	<ul style="list-style-type: none"> <li>• The time period for phase out seems reasonable for the substances no longer manufactured or imported. Worksafe cannot offer any comment on the effect the phase out period will have in regards to Top Clip but questions whether seasonal patterns of sheep dipping may need to be considered in that decision.</li> </ul>
Fido's Ear Drops HSR001825	<p>Worksafe New Zealand</p> <ul style="list-style-type: none"> <li>• supports the proposed changes to default controls</li> <li>• would like clarification that 'Fido's Ear Drops' is imported rather than manufactured in New Zealand</li> <li>• agrees with the methodology for risk assessment and the selection of an AOEL and ADI</li> <li>• agrees with the Agency's evaluation of risks and benefits</li> <li>• note that page 75 says staff consider it appropriate that a recommendation to wear gloves is included on the label, but does not see this recommendation listed in the proposed controls. Worksafe supports this additional labelling requirement and would like to see the term 'appropriate gloves' used in the control.</li> <li>• would like the control description T2 (page 95) to say 'Controlling <i>airborne</i> exposure in places of work through the setting of WESs' to highlight that WES only relate to exposure to airborne substances (not via skin absorption), and</li> <li>• would like the variation to state the full name of the document i.e. 'Workplace Exposure Standards and Biological Exposure Indices', and</li> <li>• would like the variation to acknowledge that the document is subject to change as WES are updated, and would like the Agency to note a new version is due out within the next few months that will supersede the 2013 version.</li> </ul>
TopClip 40 HSR001953	<p>Worksafe New Zealand</p> <ul style="list-style-type: none"> <li>• agrees with the methodology for risk assessment and the selection of an AOEL</li> <li>• considers the APVMA study relevant in terms of risk assessment in New Zealand and acknowledges there may be differences in practices and environment but given the high risk quotients these differences are unlikely to significantly reduce the risk quotients</li> <li>• acknowledges the high risk quotients determined</li> </ul>

	<ul style="list-style-type: none"> <li>• acknowledges the positive effect PPE had on the risk but has no information to determine if the PPE used in New Zealand is comparable with that used in the APVMA study, and has no data on how well PPE is applied or maintained in this work environment</li> <li>• would like it noted that in regards to shearing, workers may have cuts and scratches on the skin that would make the chemical more readily absorbed</li> <li>• would like it noted that skin absorption rates vary with different parts of the body thus adding an additional element of uncertainty to risk assessment</li> <li>• would be concerned about additional risk for people and the environment if the used dip solution was to be transferred and transported for disposal</li> <li>• notes the reports to the Poisons Centre and agrees that there may be underreporting of incidents</li> <li>• considers there could be practical mitigation measures (page 42) but these may not be practicable in terms of availability and cost, and that elimination of the substance is the preferred practicable step. Mitigation measures might include automated systems for mixing, loading, applying and disposing of the substance</li> <li>• is concerned that this revocation may be seen by users as a message that the risk in sheep dipping has been eliminated. Alternative chemicals also present health risk and require good risk management</li> <li>• notes risk of highly toxic degradation products as described in the Ag Research report, though notes that NZFSA has measures in place to minimise this risk</li> <li>• notes good practices farmers can apply to minimise the need for pesticides as described in the AgResearch report, section 10.3 'Alternatives to chemical pesticides'.</li> </ul>
Pages 46-49	<p>Worksafe New Zealand</p> <ul style="list-style-type: none"> <li>• notes these are missing but assumes this is an error.</li> </ul>