Environmental Protection Authority
Te Mana Rauhī Taiao

Summary of HS application **APP202098** and Submission guidance

Date Submissions Open:	25 August 2015
Date Submissions Close:	6 October 2015
Application number:	APP202098
Purpose:	To reasess chlorpyriphos, diazinon and carbaryl.
Applicant:	Environmental Protection Authority
Application Lead:	Matthew Allen

Purpose of this document

On 11 August 2015 , the Environmental Protection Authority (EPA) received an application seeking to reasess chlorpyriphos, diazinon and carbaryl. This application is being publicly notified to enable the public to comment and to put all relevant information before the Decision makers.

The purpose of this document is to summarise the application and to provide guidance on the submission process.

Application summary

This document is a summary of the information provided in the application only. It is not the risk assessment produced by EPA staff. The EPA staff risk assessment will be completed at a later date using information from the application, submissions and other relevant sources.

The Environmental Protection Authority (EPA) is reassessing the use of the following organophosphates and carbamates (OPC's); carbaryl, chlorpyrifos and diazinon, due to concerns about the safety and well-being of people and the environment resulting from their use.

This reassessment application has been prepared by the staff of the EPA on behalf of the Chief Executive. It includes substances that are used as veterinary medicines i.e. registered trade name products under the ACVM Act 1997, and substances used for non-plant protection insecticide uses.

The EPA staff have conducted quantitative risk assessments on four of the veterinary medicine substances included in this reassessment which are considered to still be available for use in New Zealand. These risk assessments have determined that exposure to substances containing diazinon used as flea collars, or for the control of lice, keds and flies on sheep, results in unacceptable levels of risk to people and/or the environment. The risk assessment of a substance containing carbaryl for use as ear drops on cats and dogs supports its continued use for a specific purpose, as the risks can be mitigated by adding additional controls to the approval.

A quantitative risk assessment was not carried out on 15 substances that are no longer used or where commercial products were not identified. However, the hazard classifications of these substances indicate that there is a potential for adverse effects for human health and/or the environment, depending on how they are used. This applies to all the non-plant protection substance approvals, and to the remaining veterinary medicine substance approvals covered in this document.

The benefits assessment undertaken when preparing this application indicates that the benefits from the use of substances containing diazinon and used as veterinary medicines are low to negligible. For the substance containing carbaryl, used as ear drops, the benefits are considered to be low to medium. The substances that are no longer used in New Zealand are considered to be of negligible benefit.

The EPA staff risk, cost and benefit assessment supports the continued use of only a single carbaryl containing product (HSR001825), used as a veterinary medicine as ear drops in cats and dogs, with provision for additional control measures requiring child resistant packaging and a label warning to keep out

of reach of children. The hazard classifications for this substance have also been reviewed and changes to the current classifications are proposed.

The toxicity of chlorpyrifos and diazinon means that serious human health and/or adverse environmental effects can result from their use in veterinary medicine products. Some formulated products and uses included in this reassessment have already been voluntarily discontinued by manufacturers or importers. EPA staff therefore propose to revoke approvals for those substances that are no longer available or are being voluntarily withdrawn.

Similarly, it is proposed to revoke the approvals for carbaryl, chlorpyrifos or diazinon containing substances used for non-plant protection insecticide purposes. EPA staff consider that there is a lack of benefit from these substances, given that they are no longer used, and are also concerned about the inherent risks associated with their use.

On the basis of the current information available, the EPA staff recommendations are summarised in Tables 1 and 2. For all substances for which Staff are proposing to decline the HSNO approval, a 6-month phase out period is proposed to allow adequate time for disposal of remaining stocks. A relatively short phase-out is proposed because either the substances are not currently available as far as staff are aware, or because of the high risks identified and the relative lack of benefits, given the availability of alternatives. For the carbaryl ear drops the EPA staff consider that the additional controls could be phased in over two years to allow time to make changes to packaging and labelling.

Table 1 Substances used as veterinary medicines included in this reassessment application

Active	Substance description	Trade name	HSNO Approval number	EPA staff proposal
Carbaryl	Liquid containing 1.4 - 2.6% 2-hydroxybenzoic acid, 0.7 - 1.3% **carbaryl** and 0.11 - 0.29% chlorocresol	Fido's Ear Drops	HSR001825	To **retain** for the treatment of mites, mild bacterial and fungal infections in the ears of cats and dogs, but to require appropriate labels and packaging controls
Chlorpyrifos	Flammable liquid containing 7 – 13 g/L **chlorpyrifos** and 100 – 120 g/L cypermethrin	FLYPEL	HSR0001812	To **revok**e this substance approval (no longer manufactured or imported)
	Flammable liquid containing 120 - 180 g/L **chlorpyrifos**	Xterminate 10	HSR001814	To **revok**e this substance approval (no longer manufactured or imported)
	Flammable liquid containing 32 - 50% **chlorpyrifos**	No registered trade name	HSR001816	To **revok**e this substance approval (no longer manufactured or imported)
Diazinon	Collar containing 140 – 180 g/kg **diazinon** and 1.7 – 3.2 g/kg pyriproxyfen	PetScience Flea Collar Plus for Cats & Kittens PetScience Flea Collar Plus for Dogs & Puppies	HSR001802	To **revok**e this substance approval (benefits do not outweigh risks)
	Collar containing 140 – 180 g/kg **diazinon**	VitaPet 5 Month Flea Collar for Dogs VitaPet 5 Month Flea Collar for Cats Pet Team Flea Collar for Dogs Pet Team Flea Collar for Cats	HSR001807	To **revok**e this substance approval (benefits do not outweigh risks)
	Solid containing 20 – 50 g/kg **diazinon**	Includes a product formerly registered as "Strike Powder"	HSR001808	To **revok**e this substance approval (no longer manufactured or imported)
	Flammable liquid containing 0.26 – 5% **diazinon**	No registered trade name	HSR002288	To **revok**e this substance approval (no longer manufactured or imported)

Active	Substance description	Trade name	HSNO Approval number	EPA staff proposal
	Flammable liquid containing 360 - 440 g/litre **diazinon**	TopClip 40	HSR001953	To **revok**e this substance approval (benefits do not outweigh risks)

Table 2 Substances with other pesticide uses (non-plant protection uses)

Active	Substance description	Use pattern	HSNO Approval number	EPA staff proposal
Carbaryl	Dustable Powder containing 50 g/kg **carbaryl**	Dust for wasp control	HSR000672	To **revok**e this substance approval (no longer manufactured or imported)
	Wettable powder containing 800 g/kg **carbaryl**	For wasp control	HSR000819	To **revok**e this substance approval (no longer manufactured or imported)
	Aerosol containing 0.3 – 0.7% carbaryl and 0.4 – 0.8% piperonyl butoxide	For flea control	HSR001811	To **revoke** this substance approval (no longer manufactured or imported)
Chlorpyrifos	Ready to use bait containing 5 g/kg **chlorpyrifos**	To control insects in and around buildings	HSR000164	To **revok**e this substance approval (no longer manufactured or imported)
	Paste containing 5 g/kg **chlorpyrifos**		HSR000166	To **revok**e this substance approval (no longer manufactured or imported)
	Microencapsulated suspension concentrate containing 200 g/litre **chlorpyrifos**		HSR000168	To **revok**e this substance approval (no longer manufactured or imported)
	Emulsifiable concentrate containing 240 g/litre **chlorpyrifos**. Also contains xylene		HSR000169	To **revok**e this substance approval (no longer manufactured or imported)
	Ready to use liquid containing 20 g/litre **chlorpyrifos**		HSR000172	To **revok**e this substance approval (no longer manufactured or imported)
	Flammable liquid containing 2.5 – 3% **chlorpyrifos**		HSR001810	To **revok**e this substance approval (no longer manufactured or imported)
Diazinon	General purpose insect spray	Insect spray	HSR001741	To **revoke** this substance approval (no longer manufactured or imported)

Submission process

This document also provides guidance to the submission process. The EPA encourages all submissions. The submission period for this application will start on 25 August 2015 and will end on 6 October 2015 at 5pm.

In a submission you can provide information, make comments and raise issues. In this way, you contribute to the EPA decision making process on specific applications. We are particularly interested in hearing from you on the following matters:

- Adverse effects, especially adverse effects not identified in the application[1]; and
- Positive effects, especially positive effects not identified in the application[2].

Further information on the purpose of submissions is available from the EPA website using the link below: www.epa.govt.nz/about-us/have-your-say.

If you have any questions, you can contact:

- The EPA for any question on the application and/or submission process. The Application Lead, Matthew Allen, can be contacted by e-mail (Matthew.Allen@epa.govt.nz) or by phone (04 474 5553).

[1] Adverse effects can include any risks and costs associated with release of the substance.
[2] Positive effects can include any benefits associated with release of the substance.

Making a submission

What is a submission?

We encourage anyone to make a submission, regardless of how much detail you are able to put in to it. In your submission, you can also request a hearing if you would like to strengthen your views in person before the Decision-making Committee. Further information on submissions for a hazardous substance application is available from the EPA website using the link below:

http://www.epa.govt.nz/about-us/have-your-say/Pages/what-is-submission.aspx

How to make a submission?

The EPA website provides guidance on how to make a submission. This is preferably done via the EPA submission form but may be sent as a letter or email to the EPA. This information and the submission form can be accessed from the EPA website using the link below:

http://www.epa.govt.nz/about-us/have-your-say/Pages/make-submission.aspx

What happens after you make a submission?

When the submission period closes, all submissions will be summarised and made available to the Decision-making Committee together with the EPA Staff Assessment Report.

You are entitled to bring witnesses who may speak to your submission at a hearing. If you choose this option, you should provide the EPA with a list of the witnesses, their areas of expertise, and the elements of the submission or application they will talk to.

You are also entitled to speak at the hearing in one of the three official languages of New Zealand: English, Māori or New Zealand Sign Language. Please advise the Application Lead at least two weeks prior the hearing in order for the EPA to organise for an interpreter. The Application Lead, Matthew Allen, can be contacted by e-mail (Matthew.Allen@epa.govt.nz) or by phone (04 474 5553).

At least two weeks prior to the hearing, both the applicant and submitter(s) need to provide the EPA with copies of any information they intend to present at the hearing.

A decision will be made by the Decision-making Committee at the end of the consideration period. This will be made public on the EPA website.