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Submission on modified reassessment of certain OPC substances - APP202142

Clean Earth considers that it is appropriate to undertake the reassessment of acephate, dimethoate, methamidophos, methomyl and oxamyl particularly as any form of control for withholding and non contact periods were removed previously.

Disappointedly the proposal lessens the controls that were in place previously rather than making them more robust. Certainly the proposed controls may not be sufficient to stem the tide of adverse effects to bees.

Appendix B identifies that residue studies were performed at lower rates than the maximum application rate approved in NZ and no information was provided on effects over the longer period. Several of the substances had confidential information only provided to the DMC. The studies identified statistically adverse impacts to the bees and interruption of flight pathways and altered behaviour with high mortality rates. Methamidophos has no controls, and yet the information says that night application is to take place only.

The 7 -10 non contact periods prior to flowering are reliant on the ability for growers awareness of differing growth periods including seasonal variances. Additionally, there is no information of any monitoring that is to take place therefore it appears that the proposed controls will be self monitored by the growers only. That position is inadequate and should be rectified.

There are approximately 40 species of bee within New Zealand with 8 species introduced to for crop pollination. The application only relates to the honey bee. There have been no annual surveys undertaken of bee populations to measure the decline and annual surveys should be part of any controls that are set to gauge the effectiveness of any controls set in place.

Globally there is widespread information of bee colony collapse and the proposed controls do not give confidence that the reinstatement of lesser controls will ensure that there will be no economic or diversity loss. It is widely recognised that without healthy robust

populations of bee pollinators there is a huge potential that major changes to both the biodiversity and economic values will take place.

Clean Earth wish to appear at the hearing

Decision

Apply tighter controls and phase out the organophosphate and carbamate-containing insecticide substances.