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SUBMISSION

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To: Environmental Protection Authority

Submission on: Reassessment of non contact periods for certain OPCs
APP202142

From: Federated Farmers of New Zealand

Date: 16 September 2014

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SUBMISSION**REASSESSMENT OF NON CONTACT PERIODS FOR CERTAIN OPCS
APP202142****1. FEDERATED FARMERS SUBMISSION**

- 1.1. Thankyou for giving Federated Farmers the opportunity to respond to the Environmental Protection Authority (EPA) proposal to implement non-contact periods for plant protection products containing any of the following organophosphate or carbamate (OPC) active ingredients: acephate, dimethoate, methamidophos, methomyl or oxamyl.
- 1.2. Federated Farmers supports the reinstatement of non-contact periods for all of these OPCS.
- 1.3. All of these named had been subject to non-contact periods before the initial reassessment carried out by the EPA in January 2013 (APP201045). Alternatives to these OPCS do, to some extent, also carry non-contact periods when used on certain crops at certain times and Federated Farmers does not want to drive farmers from using one hazardous agricultural compound to another which may be more hazardous to beneficial insects.
- 1.4. It is imperative that application on key commercial crops (e.g. citrus, kale, brassicas, seed crops, onions, carrots, berry fruit) is made well before flowering as the honeybee is looking for pollen and nectar opportunities early in the flowering season before the main nectar sources come on stream. The hive is particularly sensitive to such chemicals at this time of the year (spring/early summer) as the bees are young and are less robust, with numbers just starting to lift for the pollination and nectar season. A serious poisoning at this time would be deadly for the hive and full mortality is the likely outcome if the bees survive the initial contact and bring the chemical back to the hive.
- 1.5. Clear labelling will be required to ensure users are aware of these non-contact periods.

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.