To obtain approval to import or manufacture a pesticide

Send to Environmental Protection Authority preferably by email (HSApplications@epa.govt.nz) or alternatively by post (Private Bag 63002, Wellington 6140)
Payment must accompany application; see our fees and charges schedule for details.

This form should also be used for

- Antifouling paints
- Fumigants
- Plant protection products ☒
- Timber treatments
- Vertebrate Toxic Agents

Name of the substance to be approved

Diquick

Date

17 February 2016
Completing this application form

1. This form has been approved under section 28 of the Hazardous Substances and New Organisms (HSNO) Act 1996. It only covers the import or manufacture of pesticides to be released in New Zealand under section 28 of the HSNO Act. If you wish to make an application for another type of substance (such as a veterinary medicine or industrial chemical) or for another type of application (such as emergency, special emergency or containment), a different form will have to be used. All forms are available on our website.

2. It is recommended that you contact an Applications Advisor at the Environmental Protection Authority (EPA) as early in the application process as possible. An Applications Advisor can assist you with any questions you have during the preparation of your application including advising on any consultation requirements.

3. Before submitting this application, you may make an informal Status of Substance (SOS) advice request to the EPA. Further information on this process is available on our website. Please note that this is not mandatory and an SOS request is only informal advice.

4. This application form may be used to seek approvals for more than one hazardous substance, if the substances and their uses are of a similar nature.

5. Please make sure that you obtain all appropriate permissions for the use of any data that you have used or provided in this application form, if you are not the owner of such data.

6. Unless otherwise indicated, all sections of this form must be completed for the application to be formally received and assessed. If a section is not relevant to your application, please provide a comprehensive explanation why this does not apply. If you choose not to provide the specific information, you will need to apply for a waiver under section 59(3)(a)(ii) of the HSNO Act. This can be done by completing the section on the last page of this form.

7. Any extra material that does not fit in the application form must be clearly labelled, cross-referenced, and included with the application form when it is submitted.

8. Please add extra rows or tables where needed.

9. You must sign the form (the EPA will accept electronically signed forms) and enclose the application fee (including GST) unless you are already an approved EPA customer. To be recognised by the EPA as an “Approved customer”, you must have submitted more than one application per month over the preceding six months, and have no history of delay in making payments, at the time of presenting an application.

10. Information about application fees is available on the EPA website. If you wish to claim a fee reduction for a reduced-risk-formulated product the appropriate justification must be submitted at the pre-lodgement stage for consideration.

11. All application communications from the EPA will be provided electronically, unless you specifically request otherwise.
Commercially sensitive information

12. Commercially sensitive information must be put in a confidential appendix to this form (also available on our website) and be identified as confidential. If you consider any information to be commercially sensitive, please show this in the relevant section of this form and cross reference to where that information is located in the confidential section.

13. Any information you supply to the EPA prior to formal lodgement of your application will not be publicly released. Following formal lodgement of your application any information in the body of this application form and any non-confidential appendices will become publicly available.

14. Once you have formally lodged your application with the EPA, any information you have supplied to the EPA about your application is subject to the Official Information Act 1982 (OIA). If a request is made for the release of information that you consider to be confidential, your view will be considered in a manner consistent with the OIA and with section 57 of the HSNO Act. You may be required to provide further justification for your claim of confidentiality.

Definitions

<table>
<thead>
<tr>
<th>Active ingredient</th>
<th>Component of a formulated substance responsible for the pesticidal effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAS Number</td>
<td>Chemical Abstracts Service number. This is a unique identifier for a chemical substance</td>
</tr>
<tr>
<td>CIPAC Number</td>
<td>Collaborative International Pesticides Analytical Council. The CIPAC code number system is a simple approach for an unambiguous coding of active ingredients and variants used in the area/field of pesticides</td>
</tr>
</tbody>
</table>
| Hazardous substance | Any substance with one or more of the following intrinsic properties:  
  - Explosiveness  
  - Flammability  
  - A capacity to oxidise  
  - Corrosiveness  
  - Toxicity (including chronic toxicity)  
  - Ecotoxicity, with or without bioaccumulation, or  
  - which on contact with air or water (other than air or water where the temperature or pressure has been artificially increased or decreased) generates a substance with any one or more of the properties specified in this definition |
| EINECS            | European INventory of Existing Commercial chemical Substances |
| ELINCS            | European List of Notified Chemical Substances |
| IUPAC             | International Union of Pure and Applied Chemistry. The world authority on chemical nomenclature |
| Pesticide         | Substance or mixture of substances intended to be used for preventing, controlling, repelling or mitigating any pest (including vertebrates) in areas such as, but not limited to, agriculture, home and garden, rights of way or industrial |
| **Professional and non-professional users** | Professional users are using pesticides in the course of their job or business (such as farmers and growers or amenity users). Professional use may include the use of formulated substances in order to deliver services to business or private customers. Non-professional users are not using pesticides in the course of their job or business (such as lifestyle block owners, general public using pesticides for domestic use, and so on). |
| **Public register name** | Name of the formulated substance to be mentioned in a publicly available register and that can be different from the final marketing name. |
| **Relabelling** | Action of changing the label of a formulated substance intended to be imported in New Zealand in order to meet the EPA criteria for information content. This action can also occur when the formulated substance is repacked into packaging of different sizes. |
| **Repackaging** | Movement or transfer of a substance from one container to another without a change in composition of the formulation or the labelling content, for sale or distribution. |
| **Status Of Substance (SOS) advice** | The advice provided in a SOS advice request will include:  
- Whether or not a substance is hazardous  
- Whether the substance is covered or not by an existing approval  
- The hazard classifications of the substance  
- The potential relevant approval pathway for the substance. |
| **Substance** | Any of the following:  
- Any element, defined mixture of elements, compounds or defined mixture of compounds, either naturally occurring or produced synthetically, or any mixtures thereof;  
- Any isotope, allotrope, isomer, congener, radical or ion of an element or compound which has been declared by the Authority, by notice in the Gazette, to be a different substance from that element or compound;  
- Any mixtures or combinations of any of the above;  
- Any manufactured article containing, incorporating or including any hazardous substance with explosive properties.  
(Section 2(1) HSNO Act) |
1. Applicant details

1.1. Applicant

**Company Name:** Global Agrichem Limited  
**Contact Name:** Zhu Yunfeng  
**Job Title:** Managing Director  
**Postal Address** (provide only if not the same as the physical): PO Box 24472,  
Royal Oak,  
Auckland 1023

**Physical Address:**  
860B Manukau Road,  
Royal Oak,  
Auckland 1061  
**Phone:** (09) 972 9837 **Mobile:** 022 1915641  
**Fax:** N/A  
**Email:** info@agro.co.nz

1.2. New Zealand agent or consultant (if applicable)

**Company Name:** Grayson Wagner Company Ltd  
**Contact Name:** Chris Dane  
**Job Title:** Consultant to Global Agrichem limited  
**Postal Address:** PO Box 112-318, Penrose, Auckland 1642  
**Physical Address:** 4 Cain Road, Penrose, Auckland 1642  
**Phone:** (09) 571 2444  
**Fax:** (09) 571 2444  
**Email:** cdane@graysonwagner.co.nz
1.3. **Formal correspondence contact**
All formal correspondence will be sent to the contact person for the application identified here

**Company Name:** Grayson Wagner Company Ltd

**Contact Name:** Chris Dane

**Job Title:** Consultant to Global Agrichem

**Postal Address:** PO Box 112-318, Penrose, Auckland 1642

**Physical Address:** 4 Cain Road, Penrose, Auckland 1642

**Phone:** (09) 571 2444

**Fax:** (09) 571 2444

**Email:** cdane@graysonwagner.co.nz

1.4. **Invoice contact**
Only if different from 1.3. Formal correspondence contact - invoice will be sent to the contact person identified here

**Company Name:**

**Contact Name:**

**Job Title:**

**Postal Address:**

**Physical Address:**

**Phone:**

**Fax:**

**Email:**
2. Information about the substance

2.1. Purpose statement or executive summary of the application for the public register

No more than 1,100 characters including the description of the formulated substance to be approved, e.g. Soluble Concentrate 350-400 g active ingredient/L

This is an application to import Diquick into New Zealand, a selective herbicide containing the active ingredient Dicamba for the control of difficult broadleaf weeds including atrazine resistant fathen in cereals, maize, pasture, turf and waste areas.

The product will be formulated and packaged in China and contains Dicamba 500g/litre formulated as a soluble concentrate (SL).

Diquick has the following hazard classifications: 6.1E (acute toxicant), 6.3A (skin irritant), 6.4A (eye irritant), 6.9B (target organ systemic toxicant), 9.1A (aquatic toxicant), 9.2A (soil toxicant), 9.3C (vertebrate ecotoxicant). Based on a reduced hazard classification, the proposed use patterns and controls, Global Agrichem Limited believe that Diquick is unlikely to pose any major human health or environmental risks compared to EPA approved equivalent formulations.

Diquick is considered to be an important weed control tool for growers in cereals, maize, pasture and waste areas. The product poses a relatively low risk to humans and the environment when used according to label directions.

After importation, Diquick will be handled, stored and transported by trained personnel, experienced in the safe management of hazardous substances. The overall management of the substance with respect to transport, storage and use and container disposal will be in compliance with the Code of Practice for the Management of Agrichemicals NZS 8409:2004. Documentation to facilitate this will include the product label and Safety Datasheet (SDS).

2.2. Type of application

Tick the box(es) that best describe your application

Has ‘Status of Substance (SOS) Advice’ been obtained from the EPA?

☒ Yes ☐ No

If yes, show the SOS reference number:

1003279

If yes, is the formulation of the substance different to that submitted at the SOS stage?

(In either case, please provide the composition as part of the confidential appendix)

☐ Yes ☒ No
Is the product a new active ingredient to New Zealand?
☐ Yes ✒ No

Does the product contain any viable new organisms, including GMOs?
☐ Yes ✒ No

Does the product contain an ingredient originating from an organism (plant, animal, etc)?
☐ Yes ✒ No

Does the formulated substance contain any nanomaterial?
☐ Yes ✒ No

3. Identity of the substance
Include any commercially sensitive information in the confidential appendix of this form
Provide details on the active ingredient(s) as well as the mixture in this section

3.1. Identity of the active ingredient(s)
Active ingredient (Common Name): Dicamba
Chemical name (IUPAC): 3,6-dichloro-\(\sigma\)-anisic acid; 3,6-dichloro-2-methoxybenzoic acid.
Chemical name (Chemical Abstracts): 3,6-dichloro-2-methoxybenzoic acid.
Molecular formula: \(\text{C}_8\text{H}_6\text{Cl}_2\text{O}_3\)
Structural formula:

\[ \text{\includegraphics[width=0.5\textwidth]{structural_formula.png}} \]

\[ ^1 \text{If you tick 'Yes' and the product is being imported, then include a Biosecurity Clearance from the Ministry for Primary Industries New Zealand. If one has been provided with a previous application and is still valid, this may be referenced.} \]
Manufacturer development codes: N/A
CIPAC No: 85
CAS No: 1918-00-9
EEC No (EINECS or ELINCS): EC number 217-635-6

Function:

For plant protection products
☒ Herbicide ☐ Microbial strain ☐ Fungicide
☐ Insecticide ☐ Semiochemical (pheromone, attractant, repellent etc.) ☐ Plant Extracts

☐ Other, eg plant growth regulators (specify):

For timber treatments, Vertebrate Toxic Agents (VTA), anti-fouling paints or fumigants, please describe the function: N/A

FAO Specification (including year of publication): ☒ Yes Year: 2001 ☐ No

Minimum purity of the active ingredient as manufactured (g/kg): 980

Note: Any impurities must be specified in the confidential appendix.

### 3.2. Regulatory status of the active ingredient(s)

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Regulatory status</th>
<th></th>
<th></th>
<th></th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Never approved</td>
<td>Pending</td>
<td>Approved</td>
<td>Restricted</td>
<td>Not renewed</td>
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<tr>
<td>Australia</td>
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<tr>
<td>Other jurisdictions</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>(specify in comments)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>China and South Africa</td>
</tr>
</tbody>
</table>

*For instance, specify here under which regulation(s) or directive(s).
When restricted or not renewed, explanations should be provided: N/A

### 3.3. Identity of the formulated substance

Formulated substance name: Diquick

Manufacturer development codes: None available

Unique names for public register: Diquick

Active ingredient(s) and content (g/kg or L and % w/v): Dicamba 500g/litre % w/v 50%

### 3.4. Physical and chemical properties of the formulated substance

Provide as much information as possible on the physical and chemical properties of the substance (at 20°C and 1 atmosphere unless otherwise stated)

Appearance (colour, odour, physical state or form): Clear brown liquid.

Formulation: Emulsifiable Concentrate (EC)

pH: 5.0-9.0

Density: 1.12g/mL

Vapour pressure: Not available

Boiling/melting point: Not available

Solubility in water: Emulsifies in water

Water/octanol partitioning co-efficient: Not available

### 3.5. Regulatory status of the formulated substance

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Regulatory status</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Never approved</td>
<td>Pending</td>
</tr>
<tr>
<td>Australia</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Canada</td>
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<tr>
<td>USA</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Other jurisdictions</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Application Form Approval to import or manufacture a pesticide

1. For instance, specify here under which regulation(s) or directive(s).

Has an application been made for an approval under the Agricultural Compounds and Veterinary Medicines Act?

☐ Yes ☒ No

3.6. Composition details of the formulated substance

Full composition details for the substance must be provided in the confidential appendix

Refer to Confidential Appendix

4. Life cycle of the substance

Manufacturing

Will your formulated substance be manufactured in New Zealand?

☐ Yes ☒ No

Importation

Will your formulated substance be imported into New Zealand by air and/or sea?

☒ Sea  ☐ Air

Will your formulated substance be imported in bulk containers or packaged ready for sale?

☐ Bulk Containers  ☳ Packaged ready for sale

If your formulated substance will be imported in bulk containers, please describe these containers: N/A

Will repackaging of your formulated substance be carried out in New Zealand?

☐ Yes  ☳ No

Will relabelling of your formulated product be carried out in New Zealand?

☐ Yes  ☳ No

Please provide any additional relevant information relating to the importation of your formulated substance: No additional information

April 2014 EPA0316
Transport

Will your formulated substance be transported by road, rail, air and/or sea within New Zealand?

☒ Road  ☒ Sea  ☒ Rail  ☐ Air

Please provide any additional information relating to transport of your formulated substance:

Transport will not take place in private vehicles.

The product will be classified as Dangerous Goods (9.1A).

UN Number: UN 3082

UN Transport Hazard Classes: 9

UN Packing Group Number (UN Model Regulations\(^2\)): III

Marine Pollutant? (IMDG Code\(^3\)): Yes Class 9

Packaging

Pack sizes: 1 litre, 5 litre, 20 litre and 200 litre

Type of packaging: HDPE

Type of closure (consider opening size, type of cap, child resistant packaging): Screwing cap with aluminium inner cap.

Please provide any additional information relating to the packaging of your formulated substance:

1 litre bottle, 5 litre drum, 20 litre drum, 200 litre drum (HDPE).

Specifications - HDPE:

<table>
<thead>
<tr>
<th>Capacity</th>
<th>1 litre</th>
<th>5 litre</th>
<th>20 litre</th>
<th>200 litre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type</td>
<td>Bottle</td>
<td>Drum</td>
<td>Drum</td>
<td>Drum</td>
</tr>
<tr>
<td>Length (mm)</td>
<td>91</td>
<td>187</td>
<td>285</td>
<td>585</td>
</tr>
<tr>
<td>Width (mm)</td>
<td>91</td>
<td>137</td>
<td>225</td>
<td>585</td>
</tr>
<tr>
<td>Height (mm)</td>
<td>225</td>
<td>285</td>
<td>447</td>
<td>935</td>
</tr>
<tr>
<td>Tare (g)</td>
<td>100</td>
<td>227</td>
<td>1400</td>
<td>9500</td>
</tr>
</tbody>
</table>

Quality control after manufacture: Check and confirm the quality of the packaging material in

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\(^2\) UN Model Regulations mean Model Regulations annexed to the most recently revised edition of the Recommendations on the Transport of Dangerous Goods published by the UN

\(^3\) IMDG Code means that International Maritime Dangerous Goods code, as amended
accordance with the standard. Check and confirm cap sealed tight

Storage

Provide details of how the substance will be stored, and the facilities it will be stored in:

The product will be stored at distributor outlet facilities in an approved chemical storage facility. Storage will be in accordance with the current version of NZS 8409 Management of Agrichemicals.

Warehouse storage

Provide details of how the formulated substance will be stored: Storage will be in accordance with the current version of NZS 8409 Management of Agrichemicals in an approved hazardous substance facility.

Containment of spillages: Bunded area within an approved hazardous store serviced by a secondary containment system. The system shall be constructed from impervious materials resistant to the hazardous substance to prevent the discharge of any spill into storm water or any waste water network.

Decontamination of areas, personnel, vehicles and buildings: The use of soap and water in a contained area

Disposal

Disposal of damaged packaging, contaminated absorbents and other materials: At an approved waste facility.

Detailed instructions for safe disposal of the formulated substance and its packaging: Dispose of product only by using according to the label or at an approved landfill. Triple rinse empty container and add rinsate to the spray tank. Recycle empty container if possible, alternatively crush and bury empty container in a suitable landfill. Avoid contamination of any water supply with chemical or empty container.

Methods other than controlled incineration for disposal: Use as per the label directions or alternatively landfill at an approved site.
5. Intended uses of the formulated substance

The information you provide here will be used by the EPA to assess the risks posed by the substance and the controls assigned to manage these risks. You must outline either all the proposed uses of the product or the worst-case scenario for each application method (considering both the application rate and the frequency). Please use table 5.1 for plant protection products or table 5.2 for all other types of pesticides. Explanatory notes are below each table.

5.1. Intended uses for plant protection products

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency)
<table>
<thead>
<tr>
<th>Crop and/or situation (a)</th>
<th>Product Code</th>
<th>FGorI (b)</th>
<th>Pest or group of pests controlled (c)</th>
<th>Formulation</th>
<th>Application</th>
<th>Application rate per treatment</th>
<th>PHI (days) (l)</th>
<th>Remarks (m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct drilling of brassicas, cereals and pasture grasses</td>
<td>Diquick SOS 1003279</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV ground spray</td>
<td>Graze pasture &amp; allow 5-10cm regrowth</td>
<td>1 min 1 max</td>
</tr>
<tr>
<td>Cereals (wheat barley &amp; oats)</td>
<td>Diquick SOS 1003279</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV ground spray</td>
<td>Apply when crop has 4-5 leaves</td>
<td>1 min 1 max</td>
</tr>
<tr>
<td>Crop and/or situation (a)</td>
<td>Product Code</td>
<td>FG or I (b)</td>
<td>Pest or group of pests controlled (c)</td>
<td>Formulation</td>
<td>Application</td>
<td>Application rate per treatment</td>
<td>PHI (days) (l)</td>
<td>Remarks (m)</td>
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<td></td>
<td></td>
<td>F</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Turf</td>
<td>Diquick SOS 1003279</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV ground spray</td>
<td>1 min 1 max</td>
<td>N/A</td>
</tr>
<tr>
<td>Linseed</td>
<td>Diquick SOS 1003279</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV ground spray</td>
<td>1 min 1 max</td>
<td>N/A</td>
</tr>
<tr>
<td>Crop and/or situation (a)</td>
<td>Product Code</td>
<td>F G or I (b)</td>
<td>Pest or group of pests controlled (c)</td>
<td>Formulation</td>
<td>Application</td>
<td>Application rate per treatment</td>
<td>PHI (days) (l)</td>
<td>Remarks (m)</td>
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</tr>
<tr>
<td>Maize</td>
<td>Diquick SOS 1003279</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV ground spray</td>
<td>Maize 10-30 cm high</td>
<td>N/A</td>
</tr>
<tr>
<td>Marrow-stemmed kale one</td>
<td>Diquick SOS</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV ground spray</td>
<td>Crop at 4-6 true leaf</td>
<td>N/A</td>
</tr>
<tr>
<td>Crop and/or situation (a)</td>
<td>Product Code</td>
<td>FG or I (b)</td>
<td>Pest or group of pests controlled (c)</td>
<td>Formulation</td>
<td>Application</td>
<td>Application rate per treatment</td>
<td>PHI (days) (l)</td>
<td>Remarks (m)</td>
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</tr>
<tr>
<td>thousand headed kale</td>
<td>1003279</td>
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<td></td>
</tr>
<tr>
<td>Oil seed rape</td>
<td>Diquick SOS</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV ground spray</td>
<td>0.033 min</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1003279</td>
<td></td>
<td>Crop at 4-6 true leaf stage</td>
<td>0.07 max</td>
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<td></td>
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<td></td>
<td>1 min</td>
<td>0.033 min &amp;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1 max</td>
<td>0.07 max</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pasture</td>
<td>Diquick SOS</td>
<td>F</td>
<td>Californian thistle weed</td>
<td>SL</td>
<td>500g/ L</td>
<td>HV spot spray</td>
<td>0.05 min &amp;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1003279</td>
<td></td>
<td>Just prior to</td>
<td>100 litres</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1 min</td>
<td>0.05 min &amp;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1 max</td>
<td>0.05 min &amp;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Remarks:
- Do not graze feed for 2wks after application.
<table>
<thead>
<tr>
<th>Crop and/or situation (a)</th>
<th>Product Code</th>
<th>FG or I (b)</th>
<th>Pest or group of pests controlled (c)</th>
<th>Formulation</th>
<th>Application</th>
<th>Application rate per treatment</th>
<th>PHI (days) (l)</th>
<th>Remarks (m)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1003279</td>
<td>F</td>
<td></td>
<td>flowerin  of weed</td>
<td>max</td>
<td>min &amp; max</td>
<td>max</td>
<td>for 2wks after apply</td>
</tr>
<tr>
<td>Pasture</td>
<td>Diquick SOS 1003279</td>
<td>F</td>
<td>Ragwort weed</td>
<td>SL</td>
<td>500g/L</td>
<td>HV spot spray</td>
<td>Weeds - Seedling or small rosette</td>
<td>1min 3 max</td>
</tr>
<tr>
<td>Waste areas</td>
<td>Diquick SOS 1003279</td>
<td>F</td>
<td>Broad leaf weeds</td>
<td>SL</td>
<td>500g/L</td>
<td>HV ground spray</td>
<td>Apply in spring or autumn</td>
<td>1 min 1 max</td>
</tr>
<tr>
<td>Crop and/or situation (a)</td>
<td>Product Code</td>
<td>F or I (b)</td>
<td>Pest or group of pests controlled (c)</td>
<td>Formulation</td>
<td>Application</td>
<td>Application rate per treatment</td>
<td>PHI (days) (l)</td>
<td>Remarks (m)</td>
</tr>
<tr>
<td>--------------------------</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>max</td>
<td></td>
<td>max</td>
</tr>
</tbody>
</table>

(a) For crops, the EU and Codex classifications (both) should be used; where relevant, the use situation should be described (e.g. fumigation of a structure)
(b) Outdoor or field use (F), glasshouse application (G) or indoor application (I)
(c) e.g. biting and suckling insects, soil born insects, foliar fungi, weeds
(d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
(e) GCPF Codes - GIFAP Technical Monograph No 2, 1989
(f) All abbreviations used must be explained
(g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
(h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be described
(i) g/kg or g/l
(j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, season at time of application
(k) The minimum and maximum number of applications possible under practical conditions of use must be provided
(l) PHI - minimum pre-harvest interval
(m) Remarks may include: extent of use, economic importance and restrictions

for 2wks after apply
5.2. Intended use for pesticides not used as plant protection products (e.g., timber treatments, Vertebrate Toxic Agents (VTA), anti-fouling paints or fumigants)

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency).

<table>
<thead>
<tr>
<th>User (a)</th>
<th>Area of Use (b)</th>
<th>Pest or group of pests controlled (c)</th>
<th>Application</th>
<th>Application rate per treatment (f)</th>
<th>Remarks (g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td>Method (d)</td>
<td>Number min max (e)</td>
<td>Interval between applications - days (minimum)</td>
</tr>
</tbody>
</table>

(a) Professional/non-professional  
(b) Domestic/commercial/industrial  
(c) e.g., biting and suckling insects, soil born insects, foliar fungi, weeds  
(d) Method, e.g., high volume spraying, low volume spraying, spreading, dusting, drench  
(e) The minimum and maximum number of applications possible under practical conditions of use must be provided  
(f) g/kg and g/l or others  
(g) Remarks may include; extent of use, economic importance and restrictions
6. HSNO hazard classifications of the formulated substance

The information you provide here will form the basis of your substance’s HSNO classification.

Please consider each of the hazardous properties in the table below and provide information on those properties that trigger any threshold level for your substance. Use the justification column to record the reason for your classification. If your substance is a mixture, you can apply mixture rules to the hazardous components of the mixture. If you do this, you will need to provide information on the hazardous properties of each hazardous component of the mixture, and show your workings. See Assigning A Product to an HSNO Approval on our website for more information.

Please use the following abbreviations if needed.

**NA**: Not Applicable – For instance when testing is technically not possible: testing for a specific endpoint may be omitted, if it is technically not possible to conduct the study as a consequence of the properties of the substance: eg very volatile, highly reactive or unstable substances cannot be used, mixing of the substance with water may cause danger of fire or explosion or the radio-labelling of the substance required in certain studies may not be possible.

**ND**: No Data or poor quality data (according to Klimisch criteria) – where there is a lack of data.

**No**: Not Classified based on actual relevant data available for the substance – the data is conclusive and shows the threshold for classification is not triggered.

<table>
<thead>
<tr>
<th>Hazard Class/Subclass</th>
<th>Formulated substance classification</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Examples</strong></td>
<td>3.1C 6.1D</td>
<td>Flashpoint = 46 deg C (closed cup) Calculated LD50 = 1250 mg/kg (mixture rules)</td>
</tr>
<tr>
<td>Class 1 Explosiveness</td>
<td>N/A</td>
<td>SOS classification</td>
</tr>
<tr>
<td>Class 2, 3 &amp; 4 Flammability</td>
<td>N/A</td>
<td>SOS classification</td>
</tr>
<tr>
<td>Class 5 Oxidisers/Organic Peroxides</td>
<td>N/A</td>
<td>SOS classification</td>
</tr>
<tr>
<td>Subclass 8.1 Metallic corrosiveness</td>
<td>N/A</td>
<td>SOS classification</td>
</tr>
<tr>
<td>Subclass 6.1 Acute toxicity (oral)</td>
<td>6.1E</td>
<td>SOS classification Dicamba: Acute oral LD_{50} for rats 1707 mg/kg (Pesticide Manual 15th Ed). Dimethylamine Acute oral LD_{50} for mice 790 mg/kg (MSDS)</td>
</tr>
<tr>
<td>Subclass 6.1 Acute toxicity (dermal)</td>
<td>N/A</td>
<td>SOS classification</td>
</tr>
</tbody>
</table>
### Subclass 6.1 Acute toxicity (inhalation)

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.1 Aspiration hazard

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.3/8.2 Skin irritancy/corrosion

<table>
<thead>
<tr>
<th></th>
<th>6.3A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification. Dimethylamine is a skin irritant. MSDS</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.4/8.3 Eye irritancy/corrosion

<table>
<thead>
<tr>
<th></th>
<th>6.4A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification. Dicamba extremely irritating to eyes (Pesticide Manual 15th Ed). Dimethylamine is an eye irritant. MSDS</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.5A Respiratory sensitisation

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification.</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.5B Contact sensitisation

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.6 Mutagenicity

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.7 Carcinogenicity

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.8 Reproductive or developmental toxicity

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification.</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.8 Reproductive or developmental toxicity (known, presumed or suspected)

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.8 Reproductive or developmental toxicity (via lactation)

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 6.9 Target organ systemic toxicity

<table>
<thead>
<tr>
<th></th>
<th>6.9B</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification. Dimethylamine may trigger the Target Organ Systemic toxicant hazard (MSDS)</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 9.1 Aquatic ecotoxicity

<table>
<thead>
<tr>
<th></th>
<th>9.1A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification. Dicamba Fish: ( \text{LC}<em>{50} ) (96 h): 135 mg/litre (Rainbow trout and bluegill sunfish) Algae: ( \text{LC}</em>{50} ): 3.7-41mg/litre depending on species. Daphnia: ( \text{LC}_{50} ) (48h): 120.7 mg/litre (Daphnia magna) (All - Pesticide Manual 15th Ed)</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 9.2 Soil ecotoxicity

<table>
<thead>
<tr>
<th></th>
<th>9.2A</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOS classification: Dicamba - Microbial degradation. ( \text{DT}<em>{50} ): &lt; 14d. ( \text{LC}</em>{50} ) (14 d) worms: &gt; 1000 mg/kg (Pesticide Manual 15th Ed).</td>
<td></td>
</tr>
</tbody>
</table>

### Subclass 9.3 Terrestrial vertebrate ecotoxicity

<table>
<thead>
<tr>
<th></th>
<th>9.3C</th>
</tr>
</thead>
</table>

---

4 Identify classification for single and/or repeat dose target organ toxicity for oral, dermal or inhalation routes
7. Risks, costs and benefits

These are the positive and adverse effects referred to in the HSNO Act. It is easier to regard risks and costs as being adverse (or negative) and benefits as being positive. In considering risks, cost and benefits, it is important to look at both the likelihood of occurrence (probability) and the potential magnitude of the consequences, and to look at distribution effects (who bears the costs, benefits and risks).

You will need to consider the effects on the environment and human health and welfare, including any social effects.

In each section below, set out the information under the following three sub-headings:
- Costs and benefits which can be stated in monetary (dollar) terms
- Non-monetary risks and costs
- Non-monetary benefits.

You must fully complete this section, referencing supporting material. You will need to provide a description of where the information in the application has been sourced from, e.g. from; in-house research, independent research, technical literature, community or other consultation, and provide that information with this application.

<table>
<thead>
<tr>
<th>Lifecycle activity</th>
<th>Associated source of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufacture</td>
<td>Not applicable in New Zealand as the product is manufactured in China.</td>
</tr>
<tr>
<td>Transport</td>
<td>An incident during the transport of the substance resulting in spillage and subsequent exposure of people or the environment to the substance.</td>
</tr>
<tr>
<td>Storage</td>
<td>An incident during storage resulting in spillage and subsequent exposure of people or the environment to the substance.</td>
</tr>
<tr>
<td>Use</td>
<td>Application of the substance resulting in exposure of workers, bystanders or the environment or an incident during mixing or use resulting in spillage and subsequent exposure of workers or the environment to the substance.</td>
</tr>
</tbody>
</table>

1. Non-monetary risks and costs: (In house research)
Disposal

Disposal of the substance or packaging, resulting in exposure of people or the environment to the substance

2. Costs and benefits which can be stated in monetary terms (In house research):

Costs:
- Training of staff to handle the substance
- Storage facilities for safe storage
- Application equipment maintenance to optimise efficacy
- Provision of protective equipment

Benefits
- Additional source of the substance to users
- Herbicidal efficacy
- Excellent quality grain and pasture

3. Non-monetary benefits (In house research)
- Easy to use soluble concentrate formulation
- Easy to store formulation (HDPE containers)
- Quality manufactured formulation
- Optimal herbicidal efficacy
- Relatively safe to use herbicide.

7.2. Provide an assessment of those risks, costs, and benefits identified in Section 7.1

This section excludes risks, costs, and benefits which relate specifically to Māori taonga or to international agreements. See Sections 7.3 and 7.4 for those aspects.

A full assessment must be provided of all the risks, costs and benefits identified in Section 7.1. For the risk assessment our preferred format is quantitative, however, you may also provide a qualitative assessment if you can justify this. If you are providing your risk assessment in supporting documentation with this application you can provide a summary of all the risks this in this section.

Please note that if you do not complete a full assessment of all risk, costs and benefits this may result in the EPA requesting further information from you, which will mean that your application takes longer to process.

It should be noted that the active ingredient in the substance Diquick EC (Dicamba 840g/litre) is currently approved by EPA for a number of products as HSR000442. Diquick differs from these products through the lower hazard rating of the vertebrate ecotoxicant 9.3C instead of 9.3B. In addition the product does not trigger the invertebrate ecotoxicant hazard 9.4.

4. Non-monetary risks and costs: (In house research)

Potential Environmental Effects

Risk of air contamination:
Diquick will only be applied using ground application which will reduce the spray drift risk to a minimum.

Risk of water contamination:
Contamination of water is unlikely except through the possibility of spray drift onto water or misuse leading to water contamination.

The product is harmful to aquatic organisms should contamination occur (9.1A).
Label precautions will be included to prevent or minimise contamination of water by product or empty containers.

Risk of soil contamination:
Diquick is classified as a soil ecotoxicant (9.2A) as is the case with most herbicides. The substance is degraded by micro-organisms. The DT$_{50}$ is 14 days indicating fairly rapid degradation. The risk to the soil environment can be considered to be low.

Risk to aquatic organisms:
The threshold for aquatic vertebrates and invertebrates is triggered (9.1A). The product is also harmful to algae. There is therefore a high risk to aquatic organisms. These are risks for which label warnings will be included to attempt to prevent water contamination, or spray drift over water.

Risk to vertebrates:
Diquick is classified as a low level vertebrate ecotoxicant (9.3C). The product is applied before the development of crop seed limiting exposure to birds. The product is not considered to be a high risk to vertebrates. The risk will be minimised if label recommendations are followed.

Risk to native flora:
Naturally occurring algae will be affected if water contamination occurs. The substance is a herbicide and is moderately toxic to algae. The risk will therefore be low due to the fact that Diquick will only be applied using ground spraying equipment minimising the risk of spray drift onto or into water. Spraying over water should be avoided.

Risk to native fauna:
The substance is a vertebrate ecotoxicant (9.3C). There will be a low risk to native fauna. All possible precautions should be taken to avoid drift.

Effects on Economic Social and Cultural Wellbeing of Communities

Risks to public health:
Diquick is classified as harmful to humans (6.1E, 6.3A, 6.4A, and 6.9B) with the main hazard coming from repeated exposure which can easily be avoided.

- **Exposure of workers, operators and bystanders:** The EPA hazard classification of Diquick for toxicity is 6.1E, 6.3A, 6.4A, and 6.9B. The label will carry clear instructions to wear protective clothing such as waterproof gloves, boots and overalls while handling, preparing the spray mix, or applying the product. Bystanders are not considered to be at risk provided they stand well away from the mixing and treating area.

- **Accidental oral ingestion:**
  Accidental ingestion of Diquick is unlikely, but deliberate ingestion which is also unlikely, will not be acutely toxic (6.1E) which should not cause serious harm. The target organ systemic (6.9B) effect is unlikely to cause harm as this only applies to repeated ingestion. The product should be stored under lock and key and should not be kept in any container other than the original container to minimize the possibility of accidental ingestion.

Long term risks (Future Generations)

Loss of value in Ecosystems
No adverse effects such as the accumulation of residues or long term effects on the environment are anticipated. Diquick is considered to be biodegradable and no accumulation in the environment is anticipated.

Accumulation of residues in soils and waterways.
Diquick is unlikely to accumulate in waterways or soils even if the substance is sprayed over water or there is an accidental spill. Precautions on the label should minimise this risk. Diquick is considered to be a moderate risk to the soil environment.
Areas of risk during the different phases of the Diquick lifecycle.

Manufacture:
Not applicable to New Zealand as the substance will be manufactured in China.

Transport and storage:
Transport accident:
Diquick is classified as Dangerous Goods for Transport (Class 9.1A). Spillage instructions will appear on the label. The risk would primarily be to the aquatic environment and would depend on the volume being transported and or the volume spilled. The potential effect could range from minimal to major. The formulation is a liquid which could readily move into waterways if not contained in a transport accident.

Damage to packaging during storage:
Provided the substance is stored in approved storage facilities, normal containment measures should prevent the substance entering the environment. The risk would be to the aquatic environment and would depend on the volume being stored and or the volume spilled. The potential effect could range from minimal to major. Warehouse staff of proprietors and resellers are required to observe Codes of Practice (ISO 9002 or GrowSafe) while storing Diquick. Growers are also GrowSafe accredited.

Use:
Spillage of substance during mixing and use (Refer to the attached Diquick draft label)
Diquick is a liquid formulation which could easily be spilt during the process of mixing and filling the spray tank. Diquick can only be applied using ground spraying equipment minimising the risk of environmental contamination by spray drift. Controls will include label statements on toxicity to the aquatic environment, avoiding spray drift over water and avoiding the contamination of any water supply with chemical or empty container.

Disposal:
Incorrect disposal of surplus product or spray mixture: There should be no need to dispose of any “left over” spray mix if the directions for use are followed. The shelf life of the product allows for the substance to be stored for up to two years so the risk of environmental contamination should be minimal.

A summary of the level of risk to the environment at various stages of the Diquick life cycle

<table>
<thead>
<tr>
<th>Exposure route</th>
<th>Potential effects</th>
<th>Likelihood of adverse effects occurring</th>
<th>Magnitude of adverse effect</th>
<th>Level of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spillage during transport exposing the aquatic environment</td>
<td>Death or adverse effects experienced by aquatic organisms</td>
<td>Highly improbable</td>
<td>Minimal to major</td>
<td>Insignificant to low</td>
</tr>
<tr>
<td>Spillage during storage exposing the aquatic environment</td>
<td>Death or adverse effects experienced by aquatic organisms</td>
<td>Highly improbable</td>
<td>Minimal to minor</td>
<td>Low</td>
</tr>
<tr>
<td>Incident during use exposing the aquatic environment</td>
<td>Death or adverse effects experienced by aquatic organisms</td>
<td>Highly improbable</td>
<td>Minimal</td>
<td>Low</td>
</tr>
<tr>
<td>Incident during disposal exposing the aquatic environment</td>
<td>Death or adverse effects experienced by aquatic organisms</td>
<td>Highly improbable</td>
<td>Minimal</td>
<td>Low</td>
</tr>
</tbody>
</table>

Global Agrichem limited believe that the default controls, the controls set by the Agricultural Compounds and Veterinary Medicines Act and “Good agricultural practise” will result in adequate management of any risk to the user, the public and the environment from Diquick if the substance is transported, stored and used as per the label directions.
5. Costs and benefits which can be stated in monetary terms (In house research):

The use of the substance Diquick is unlikely to have any adverse economic effects on communities if applied according to the label. Likely costs, apply to all pesticides in terms of training of handlers, correct storage, the provision of the correct protective clothing and the good maintenance of application equipment.

Benefits include an additional competitor in the market which could lead to economic benefits through more competitive pricing. A quality crop end product should enable improved product value leading to additional earnings.

6. Non-monetary benefits (In house research)

Diquick is formulated to a high standard to maximise efficacy, be easy to use and store.

Diquick is an effective herbicide which will control the broadleaf weeds listed on the label. This should result in optimal herbicidal efficacy and therefore should contribute to a high quality end product on farm.

<table>
<thead>
<tr>
<th>7.3. Provide an assessment of any risks, costs and benefits which arise from the kaitiaki relationship of Māori and their culture to the environment</th>
</tr>
</thead>
</table>
| Please note that consultation with Māori may be appropriate for this application. Please refer to the EPA policy ‘Engaging with Māori for applications to the EPA’ which can be found on the EPA website (www.epa.govt.nz) or contact the EPA for advice.

An example of the issues to consider include whether the substance poses any risk to native or valued species, or waterways.

- Costs and benefits which can be stated in monetary (dollar) terms:
  Costs: These would only apply in the unlikely situation where a spill or transport accident occurred or the substance was incorrectly used in terms of handling and use leading to environmental contamination. Any such costs should they arise would not be for the account of Māori.

  Benefits: Assistance to produce a quality high value crop as listed on the label.

- Non-monetary risks and costs:
  It is believed that under normal conditions the substance Diquick will have no detrimental effects on cultural, spiritual and ethical issues, nor would accidental misuse lead to adverse effects culturally, spiritually and ethically if dealt with appropriately as indicated on the label.

  The protection of indigenous flora and fauna and natural resources and the purity of air, water, land and natural habitats from the Māori perspective have been considered. Diquick will only be used in the same way as the numerous existing and similar herbicides approved for the same uses in agriculture.

  Application will generally take place in such a way that the substance is unlikely to leave the confines of the immediate area being treated.

  The risks to flora, fauna, natural resources, air and land are considered to be negligible and for water extremely low.

Global Agrichem limited believe that the default controls, the controls set by the Agricultural Compounds and Veterinary Medicines Act and “Good agricultural practise” will result in adequate management of any risk from Diquick to Māori or the Māori environment provided the substance
is transported, stored and used as per the label directions.

- Non-monetary benefits:

Effective weed control of difficult broadleaf weeds including atrazine resistant fathen in cereals, maize, pasture, turf and waste areas using a relatively safe to handle herbicide.

### 7.4. Provide an assessment of any risks, costs or benefits to New Zealand’s international obligations

Please show if approving or declining the substance would have any impact upon New Zealand’s international obligations.

Diquick should not provide any risks to New Zealand’s International obligations as the active ingredient is approved in terms of residues and the crops it is applied on are unlikely to be exported in large quantities. There is an equivalent herbicide which can be used if Diquick is not available.

There are no specific costs or benefits.

### 7.5. Provide information on the proposed management of the substance

Please outline how the risks of the substance will be managed. This may include default controls triggered by the hazardous property classification(s) and reference to Codes of Practice or to standard operating procedures that will be followed.

**Management of risks:**
Managing exposure to the hazardous substance Diquick.

**Labelling and documentation.** (Refer to the attached Diquick draft label).

The Diquick label and safety data sheet will be drawn up in accordance with the requirements of HSNO and ACVM.

Labelling to protect the user from a substance which is classified as harmful to humans (acute toxicant, skin irritant, eye irritant, target organ systemic toxicant) and harmful to very toxic to the environment (aquatic ecotoxicant, soil ecotoxicant and vertebrate ecotoxicant) through the correct use of pictograms, warnings and precautions for safe handling by use of protective clothing and to avoid contamination of any water supply with chemical or empty containers. Recommendations to triple rinse empty containers and safe disposal of the empty containers by means of recycling or alternatively disposal in a suitable landfill.

Clear instructions to the user to read the label carefully before use with reference to warnings, precautions, first aid and directions.

Label directions will be very clear to ensure the user applies the substance correctly so avoiding the use of more chemical than required.

Labelling to protect the user through correct storage (out of the reach of children) in accordance with the Management of Agrichemicals NZS 8409, wearing the correct protective clothing, avoiding contact with the substance and not smoking or eating while handling.

Labelling to identify the chemical in terms of its hazard classification 6.1D (acute toxicant), 6.3A (skin irritant), 6.4A (eye irritant), 6.9B (target organ systemic toxicant), 9.1A (aquatic toxicant), 9.2A (soil toxicant), 9.3C (vertebrate ecotoxicant), clearly stating that the substance can be harmful to humans and terrestrial vertebrates and very toxic to the aquatic and soil environment.
Packaging:
Use of high quality packaging in the form of HDPE bottles or drums with screw caps (1, 5, 20 and 200 litre containers) sealed to ensure complete closure to prevent leakage and general spillage from stored or in use containers. This will also reduce the risk of contamination in the event of a transport accident where high quality containers will minimise container breakage.

Controls:
The following controls should be applied to Diquick to ensure that the product is safe for use.
Toxic property controls: T1, T2, T4, T7, T8.
Packaging controls: P1, P3, P13, P15.
Packaging Group: PG3.
Disposal controls: D4, D5, D6, D7, D8.
Ecotoxic Property controls: E1, E2, E4, E5, E6, E7, E8.
Tracking: TR1
Approved Handler: AH1

These controls for toxicity, ecotoxicity, identification, packaging, disposal, emergency management, tracking and approved handler will be available to traders, storage facilities, handlers, end users, transporters and emergency managers via the label and or safety data sheet.

7.6. Provide an overall evaluation of the combined impact of all of the risks, costs and benefits set out in sections 7.2, 7.3 and 7.4

Please express a view on the relative importance of the different risks, costs and benefits and how they should be brought together in making a decision

Risks: The overall risks for the substance Diquick will be as a result of the following hazards:
6.1E (acute toxicant)
6.3A (skin irritant)
6.4A (eye irritant)
6.9B (target organ systemic toxicant)
9.1A (aquatic toxicant)
9.2A (soil toxicant)
9.3C (vertebrate ecotoxicant)

This means that the risks for Diquick are that the substance is considered to be harmful to humans and terrestrial vertebrates and very toxic to the aquatic and soil environments.

All these risks can be acceptably managed by means of the label and safety data sheet (attached)

Costs: Overall there are no significant costs involved.

Benefits: The benefits revolve around an additional source of supply for growers of a very effective herbicide, to control difficult broadleaf weeds including atrazine resistant fathen in the agricultural crops cereals, maize and pasture and the amenity areas of turf and waste areas.
The risk of increased quantities of the active ingredient Dicamba being applied in the market place through the availability of Diquick to growers is low as the substance will mostly be replacing existing product in the market place rather than expanding the market.

The combined impact of all the risks and costs for Diquick can be considered to be less hazardous than all the products approved as HSR000442 which also contain Dicamba 840g/litre formulated as a soluble concentrate (SL). Diquick has a reduced terrestrial vertebrate ecotoxic hazard of 9.3C instead of 9.3B and does not trigger the 9.4 (terrestrial invertebrate ecotoxicant) hazard.

8. Pathway determination and rapid assessment

Under the HSNO Act, applications may be processed under different pathways, including a rapid assessment. The pathway for your application will be determined after its formal receipt, based on the data provided in this application form. If you would like your application to be considered for rapid assessment (as per the criteria below), we require you to complete the attached statutory declaration and provide a signed hard copy.

Please note that the EPA will not be able to proceed with the rapid assessment without the statutory declaration.

8.1. Rapid assessment

Under the HSNO Act, a hazardous substance may be approved under a rapid assessment if one of the three following options is satisfied. Please show the section that is relevant to your application.

| A substance having a similar composition and similar hazardous properties has been approved | ☐ Yes ☒ No |
| If Yes, please give the name of the reference substance: |

| The substance has one or more hazardous properties and each has the least degree of hazard for that property; or | ☐ Yes ☒ No |
| |

| The substance has been formulated so that one or more of its hazardous properties has a lesser degree of hazard than any substance that has been approved under the Act. | ☒ Yes ☐ No |
| If Yes, please give the name of the reference substance: Kamba (P5666) / Rainvel (P8815) HSR000442 |
8.2. Statutory Declaration

I, Christopher McLelland Wardle Dane, of 4 Cain Road, Penrose, Auckland 1642, Regulatory Affairs Manager for Grayson Wagner Co Ltd, being the applicant or authorised to do so, on behalf of the applicant, verify that the information contained in this application for Diquick is true and correct. I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declarations Act 1957.

Signature

Declared at Auckland on this 17th day of February 2016 before me.

Witness signature

Barrister or Solicitor of the High Court of New Zealand
[or Justice of the Peace, Notary Public, or other person authorised to take a statutory declaration]
9. Checklist
This checklist is to be completed by the applicant

<table>
<thead>
<tr>
<th>Application</th>
<th>Comments/justifications</th>
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<tbody>
<tr>
<td>All sections of the application form completed or you have requested an information waiver under section 59 of the HSNO Act</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Confidential data as part of the confidential form</td>
<td>☒ Yes ☐ No</td>
</tr>
</tbody>
</table>

Supplementary optional information attached:

- Copies of additional references | ☐ Yes ☒ No |
- Letter(s) of access | ☐ Yes ☒ No |
- Relevant correspondence | ☐ Yes ☒ No |
- Draft label | ☒ Yes ☐ No | Attached |
- Draft Safety Data Sheet (SDS) | ☒ Yes ☐ No | Attached |

<table>
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<tr>
<th>Administration</th>
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<tbody>
<tr>
<td>Are you an approved EPA customer?</td>
<td>☒ Yes ☐ No</td>
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<tr>
<td>If yes are you an:</td>
<td></td>
</tr>
<tr>
<td>Applicant: ☐</td>
<td></td>
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<tr>
<td>Agent: ☐</td>
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If you are not an approved customer, payment of fee will be by:

- Direct credit made to the EPA bank account (preferred method of payment) | ☒ Yes ☐ No |
| Date of direct credit: 17 Feb 2016 | |
| ☐ Payment to follow |
- Cheque for application fee enclosed | ☐ Yes ☒ No | ☐ Payment to follow |

Electronic signed copy of application e-mailed to the EPA | ☒ Yes |

Physical copy of signed statutory declaration sent to the EPA, (rapid assessment only) | ☐ Yes |
Signature of applicant or person authorised to sign on behalf of applicant

☒ I am making this application, or am authorised to sign on behalf of the applicant or applicant organisation.

☒ I have completed this application to the best of my ability and, as far as I am aware, the information I have provided in this application form is correct.

17 February 2016
Signature Date

Request for information waiver under section 59 of the HSNO Act

☐ I request for the Authority to waive any legislative information requirements (i.e. concerning the information that has been supplied in my application) that my application does not meet (tick if applicable).

Please list below which section(s) of this form are relevant to the information waiver request: