



Submission

Submission to	Decision-making Committee of the Environmental Protection Authority
Application	APP202804 – Ethanedinitrile (EDN)
From	Fire and Emergency New Zealand
Contact	Dr. Trudy Geoghegan, National Hazardous Substances Advisor Trudy.geoghegan@fireandemergency.nz 027 440 4424 Fire and Emergency New Zealand National Headquarters 80 The Terrace; PO Box 2133 Wellington 6140
Hearing	Fire and Emergency does not wish to be heard, but we are available to speak to this submission if requested.

Submission

Fire and Emergency New Zealand (previously the New Zealand Fire Service) is responsible for responding to hazardous substance incidents in New Zealand, including those relating to fumigation activities.

We note that previous approvals for fumigant products have required fumigators to provide comprehensive product information (including: toxicology and ecotoxicology reviews, evacuation procedures, personal protective equipment and first aid information) to the Fire and Emergency NZ Communication Centers each time they use the fumigant product. The primary role of our Communication Centers is to answer 111 calls and dispatch crews to emergencies. Receiving and processing large volumes of notification data can put undue pressure on call center operators and inhibit the operators' ability respond to emergency calls. Therefore, it is important for us to restrict the amount of information we receive to only the information that is of value during an emergency, and which is unique to the site or operation making the notification.

Given the proposed classifications of EDN, people using EDN for certain commercial purposes will be required to notify the nearest Fire and Emergency Communications Center before they use EDN, in accordance with the Health and Safety at Work (Hazardous Substances) Regulations 2017. This requirement is currently achieved by fumigators providing a written notification, using a form from our website (<https://fireandemergency.nz/hazardous-substances/fumigation/>). This process ensures that we receive the information that we require during an emergency in a consistent format.

In an emergency, we can access information on the toxicology and ecotoxicology of substances, first aid and protective equipment requirements etc. via networks of national and international scientific advisors and specialist HAZMAT databases, which already include EDN. We also hold a database of emergency response plans for businesses that are required to provide them to us.

Outcome requested

We request that the Decision-making Committee retain the default notification provisions and do not add any requirements for additional information to be sent to Fire and Emergency New Zealand.