

STRAWBERRY GROWERS N.Z. (INC)



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To: Environmental Protection Authority

Email: EDN@epa.govt.nz

From: Strawberry Growers New Zealand Inc

Email: mahern@primaryservices.co.nz

Subject: APP202804 – EDN

The Strawberry Industry is making a submission on application APP202804 to support the import of ethanedinitrile (EDN) and believes EDN has the potential to be as effective if not better than methyl bromide.

Based on the current evidence, it seems EDN can be used not only as a fumigant for wood products but we also as an effective soil fumigant. We note EDN was approved for use as a soil fumigant in Australia on the 13th March 2018. Following news of this registration we have accessed the attached papers that indicate it would be an effective fumigant for strawberries.

- 2006 *Fragaria × ananassa*, soil disinfestation, methyl bromide S.W. Mattner, R.K. Gounder, R.C. Mann, I.J. Porter, J.N. Matthiessen, Y.L. Ren, M. Sarwar
- 2006 Ethanedinitrile (C₂N₂) – A Novel Soil Fumigant for Strawberry Production S.W. Mattner, R.K. Gounder, R.C. Mann and I.J. Porter J.N. Matthiessen*, Y.L. Ren Primary Industries Research Victoria and M. Sarwar
- 2009 Ethanedinitrile and Iodomethane- Promising New Fumigants In Australian Horticulture S.W. Mattner\ R.C. Mann\ R.K. Gounder\ Y.L. Ren⁸, M. Sarw~, J.N. Matthiessenc, R.W. Brett\ A.L. ShanksA and I.J. Porter

As a sector we recognise that this application applies to the use EDN as a fumigant for wood products. Unfortunately we note when it is approved it will not be able to be used on soil. We are very interested in the current application and if it is successful and the EPA is satisfied that the risks associated with the use of EDN can be managed, we will ask Draslovka to apply for EDN's registration as a soil fumigant.

The Strawberry Industry is heavily reliant on a soil fumigant for the preparation of sterile soil beds for the production of high health plants in nurseery and also in fruiting plant beds. Our industry was very reliant on methyl bromide until approx. 10 years ago when the use was banned. Since then, there has been a total reliance on Telone/Chloropicrin which has proven to be an adequate but less effective substitute. However in recent years our propagators and growers have reported increasing issues with soil pathogens, especially *Phytophthora cactorum* and weed control in strawberry nursery beds. Approximately 15 million plants are produced each year so this is a major issue. As there is currently no other fumigant available, an alternative application such as EDN is of great interest to our industry which has a value of approx. \$30-40+mil with a rising export component.

With thanks for your consideration

Michael Ahern

Executive manger

Strawberry Growers New Zealand Inc