

# APP203736 - Boxer Gold

## Submission Reference no: 3

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**Submitter Type:** Not specified

**Source:** Web Form

**Overall Position:****Overall Notes:****Clause**

What is your position on the application

**Position**

I oppose the application

**Notes**

I oppose the application for the following reasons: 1) The introduction of any novel chemical into our environment and the food chain is intrinsically undesirable. 2) The benefit of the product is largely speculative. No information is given in the Application of prevailing herbicide usage in potato cultivation nor of the presence/degree of herbicide resistance. The product is offered as a solution without a defined problem. The threshold for approval of a hazardous substance should at least require definition of the particular problem that the product is intended to address and demonstration of how the product provides a solution or at least some advantage over the present situation. 3) When the EPA considers both environmental effects and matters of cultural and economic wellbeing in its deliberations it might be assumed that the intention would be to minimise adverse environmental effects and that the introduction of a new agent shows some advantages in this respect over conditions at present. There is no evidence for such in the Application and it appears that any adverse effects are purely additive to those that presently exist. 4) There is an excessive risk of contamination of water bodies. Both the novel ingredient in the product (prosulfocarb) and the constituent with prior approval (metolachlor) appear to have a risk of accumulation in water bodies. This risk appears significantly higher in the case of metolachlor while prosulfocarb has specific toxicity against green algae. The topography in the potato-growing area with which I am most familiar (Pukekohe) is of low, rounded hillsides interspersed with many small streams; an 'ideal' setting for flushing of herbicide into waterways, particularly when combined with the episodic torrential rainfall that is common in the Auckland region. Metolachlor is widely detectable in water including drinking water in the USA and it has the status of a possible human carcinogen. Unless the use of the product can be shown to cause reduced risk of water contamination than present agents, it should not be approved.

**Clause**

All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.

**Position**

No I do not wish to speak about my submission at the hearing

**Notes**