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Send by post to: Environmental Protection Authority, Private Bag 63002, Wellington 6140

OR email to: submissions@epa.govt.nz

Once your submission has been received the submission becomes a public document and may be made publicly available to anyone who requests it. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.

Submission on application number:	APP203816
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I wish to keep my contact details confidential

The EPA will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. We will use your contact details for the purposes of processing the application that it relates to (or in exceptional situations for other reasons permitted under the Privacy Act 1993). Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above. We may also use your contact details for the purpose of requesting your participation in customer surveys.

The EPA is likely to post your submission on its website at www.epa.govt.nz. We also may make your submission available in response to a request under the Official Information Act 1982.

- I support the application
- I oppose the application
- I neither support or oppose the application

The reasons for making my submission are¹:

Greater Wellington Regional Council (GWRC) supports the proposal to import or manufacture the herbicide Method® 240 SL for release, for the intended purpose of controlling wilding conifers and other woody weeds on non-crop farm land and conservation land.

Method® 240 SL Herbicide contains aminocyclopyrachlor, a new active ingredient for New Zealand. Proposed application methods are broadcast spraying (from the ground or air), spot spraying, cut stump and stem treatment, trunk injection or basal bark treatment. Method® 240 SL is a systemic herbicide, disrupting gene expression to cause undifferentiated cell division and elongation.

Currently Greater Wellington staff use a combination of triclopyr, picloram and aminopyralid (all picolinic acids, Group 3 herbicides, described as 'hormone disrupters') or metsulfuron-methyl (a sulfonyleurea 'ALS inhibitor'), all of which are selective, translocated herbicides, to control wilding pines and other woody weeds. Aminocyclopyrachlor is different from all these chemicals, which is useful in the instance of herbicide resistance developing.

Method® 240 SL contains 240g/L aminocyclopyrachlor, and it is suggested that it only be assigned the HSNO classification 9.1D (slightly harmful to the aquatic environment).

In comparison to this, the herbicides Greater Wellington staff currently use have a rating of 9.1A (very ecotoxic in the aquatic environment) - excluding Vigilant II gel which is coded as 6.5B, 6.9B, 9.2A (contact sensitiser, harmful to human target organs/systems, very ecotoxic in the soil environment). Those herbicides rated at 9.1A also have some or all of the following ratings: 3.1D (flammable liquid), 6.1D and 6.1E (acutely toxic), 6.3A (skin irritant), 6.3B (mild skin irritant), 6.4A (eye irritant), 6.5B (contact sensitiser), 6.9B (harmful to human target organs/systems), 9.2A (very ecotoxic in the soil environment), 9.3C (harmful to animals).

Bayer states that Method® 240 SL is practically non-toxic to the honey bee. Aminocyclopyrachlor is toxic to terrestrial plants but practically non-toxic to moderately toxic to aquatic plants. Aminocyclopyrachlor has low acute and chronic toxicity to mammals, birds, fish and aquatic invertebrates and non-target insects. The risks to organisms are low to negligible, all of which is very favourable when compared to triclopyr which is toxic to fish, moderately toxic to aquatic organisms and animals and slightly toxic to bees (although triclopyr does rapidly break down in soil and water to a form which is of low toxicity).

Bayer state that aminocyclopyrachlor controls invasive weeds and brushes at lower use rates with less number of applications than most of the currently registered alternatives, which, if correct will be very beneficial in reducing the amount of herbicide used in the environment.

The water-based formulation does not have to be mixed with other herbicides to achieve the required level of efficacy against target weeds (but will still make use of additives). In comparison, triclopyr, for example, has a fairly high concentration of a petroleum-like solvent in the formulation, and we routinely add either a spraying oil or an organosilicone surfactant to the herbicide used for greater effectiveness. Picloram is very persistent in soil, and can easily leach through the soil and kill non target plants, so has to be used with caution.

- I wish to be heard in support of my submission (this means that you can speak at the hearing)
- I do not wish to be heard in support of my submission (this means that you cannot speak at the hearing)

¹ Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.

I wish for the EPA to make the following decision:

Greater Wellington Regional Council supports the proposal to import or manufacture the herbicide Method® 240 SL. As a chemical capable of controlling wilding pines and other woody weeds at a low dosage, with a different mode of action, and a lower toxicity and ecotoxicity profile than the herbicides currently in use for the purpose, we believe it will be of significant advantage to users and of less potential harm to the environment.
