

SUBMISSION FORM

For Hazardous Substance and New Organism Applications

Once you have completed this form

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
Name of submitter or contact for joint submission:	Willem Aalderink
Organisation name (if on behalf of an organisation):	
Postal address:	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div>
Telephone number:	<div style="background-color: black; width: 80px; height: 15px;"></div>
Email:	<div style="background-color: black; width: 150px; height: 15px;"></div>

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: (further information can be appended to your submission, see footnote).

I oppose the application in its current form. The application states that the product can be applied at any time during active growth. I oppose this approach and request the EPA to put restrictions on application during adverse weather conditions.

I also believe that the research examples provided are too limited in scope. Most studies have a max. duration of 21 days or less. There is information available for a previous product with the active ingredient which indicates that residue may be present in soil and water for much longer than the 21 days. When dissolved in water, either in bodies of water or in ground water, the half life of the active ingredient is much longer than in soil as it needs soil organisms to break down. There are reports that the previous product caused certain plants/trees to show damage or die after 4 to six weeks AFTER the ground around them was treated. Use of this product in conservation areas may need to be restricted.

The research presented shows results for various formulations i.e. aminocyclopyrachlor, Aminocyclopyrachlor technical, aminocyclopyrachlor 240 g/L SL, 3.96 SLaminocyclopyrachlor-dimethylamine, aminocyclopyrachlor methyl 800 WG. It gives the impression that the most favorable results have been presented only.

No research results have been presented as a formulated product, including the additives, surfactants etc. Those can have a significant adverse effect in (eco) toxicity and should be considered before approval.

In the links below there is reference to the product still killing trees after two years from withdrawal of the product. It is also stated that the product stays active in plant tissue for a long time, which can have a significant impact on revegetation and erosion.

Relevant information can be found in information relating to Imprelis, a DuPont product that was withdrawn from the market within a year from introduction. <https://blog.restek.com/?p=3307>; <http://www.bigblogofgardening.com/duPonts-imprelis-herbicide-suspected-of-killing-evergreens/>; <http://www.bigblogofgardening.com/imprelis-the-herbicide-that-keeps-on-giving/>

Quote from one of the articles: "Soil testing by university laboratories has shown that Imprelis has broken down in the soil according to its published half-life (35-100 days), leaving little trace two years later. But scientists at Purdue University have discovered that the Imprelis stored in the tissues of damaged plants and trees has broken down much more slowly and may still be present in plant tissue."

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.

- 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)

If neither box is ticked, it will be assumed you do not wish to appear at a 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:

Either decline the application due to insufficient evidence with regards to the long-term environmental effect and the lack of information/research on native flora and fauna, which is in particular relevant to aerial application, or attach strict conditions to the approval with regards to removal and proper disposal of treated trees etc. I believe the latter would eliminate virtually all the economic benefits claimed, but it would be unacceptable to leave treated plants/trees standing and have the active ingredient leach into the soil/ground water/water ways for several years to come.
