
DECISION

16 December 2019

Summary

Substance	Neonicotinoids
Application code	APP203949
Application type	To decide whether there are grounds for reassessment under the Hazardous Substances and New Organisms (HSNO) Act 1996 ("the Act")
Applicant	Environmental Protection Authority
Purpose of the application	To determine whether there are grounds for reassessment of the neonicotinoids clothianidin, thiamethoxam, imidacloprid, thiacloprid, and acetamiprid
Date application received	29 November 2019
Consideration Date	16 December 2019
Considered by	A Decision-making Committee of the Environmental Protection Authority ("EPA") Dr Louise Malone (Chair) Dr Nick Roskruge
Decision	Grounds exist for the reassessment of the neonicotinoids clothianidin, thiamethoxam, imidacloprid, thiacloprid, and acetamiprid

1. Background

- 1.1. Neonicotinoids are systemic insecticides. They are used in agriculture, as seed treatments, soil and seedling drenches, or foliar sprays. Other neonicotinoid-containing substances include home garden insecticides, veterinary medicines such as lice and tick treatments, timber treatments and wood preservatives, and insecticidal pest control products such as ant baits and fly sprays.
- 1.2. Three of the neonicotinoids in this application, thiamethoxam, imidacloprid, and acetamiprid, were approved under the HSNO Act on 1 July 2006 via the Hazardous Substances (Chemicals) Transfer Notice 2006 and have the HSNO Approval Numbers HSR002755, HSR003302, and HSR004088. Thiacloprid was the subject of application HSR09052 and was approved under the HSNO Act on 25 November 2009 with the HSNO Approval Number HSR100091. While clothianidin does not have an individual approval, it is listed on the New Zealand Inventory of Chemicals (NZIoC) and there are approvals for clothianidin-containing substances.
- 1.3. Details of the neonicotinoid active ingredients clothianidin, thiamethoxam, imidacloprid, thiacloprid, and acetamiprid included in this grounds for reassessment are summarised in **Table 1**.

Table 1 Neonicotinoid active ingredients

Substance Name	CAS number	HSNO Approval Number
Clothianidin	210880-92-5	-
Thiamethoxam	153719-23-4	HSR002755
Imidacloprid	138261-41-3	HSR003302
Thiacloprid	111988-49-9	HSR100091
Acetamiprid	135410-20-7	HSR004088

- 1.4. Hazardous substances that contain these neonicotinoids were approved via the Hazardous Substances (Pesticides) Transfer Notice 2004 and in subsequent applications to import/manufacture hazardous substances under sections 28A and 29 of the Act.
- 1.5. Details of all currently approved substances that contain clothianidin, thiamethoxam, imidacloprid, thiacloprid, or acetamiprid as the active ingredient are listed in Table 2 for information purposes only. A reassessment application based on this grounds for reassessment decision may include all or some of the substances listed in Table 2, as well as any substances containing any of the five neonicotinoid active ingredients that are approved in the interim period between the decision and receipt of the reassessment application. The names of all current trade name products registered with the Agricultural compounds and veterinary medicines (ACVM) group that are associated with these HSNO approvals are also included.

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Table 2 Neonicotinoid-containing substances

Neonicotinoid active ingredient	Substance name	Approval number	ACVM Registered products
Clothianidin	Suspension concentrate containing 600 g/litre clothianidin	HSR000694	Poncho Clear, Agri-One, Prostrike, Patrol, Clo-Kote, NipsIT INSIDE
	Poncho	HSR100825	Poncho
	Poncho Votivo	HSR101149	Poncho Votivo
	Keyrole Pro	HSR101047	KeyRole Pro
	Endow 600SC	HSR101319	-
Thiamethoxam	Suspension concentrate containing 600 g/litre thiamethoxam	HSR000408	Cruiser 600FS
	Suspension concentrate containing 350 g/litre thiamethoxam	HSR000410	-
	Actara	HSR000099	Actara, Rockot
	Durivo	HSR100068	Durivo
	Solvigo	HSR101003	Solvigo
	Insecticidal Sand	HSR101021	-
	OPTIGARD Ant Gel Bait	HSR101077	-
Imidacloprid	Advantage Multi	HSR000060	Advantage
	Nissanclean CI	HSR000061	-
	Pilarking	HSR000078	-
	Advantix K9	HSR000090	-
	Emulsifiable concentrate containing 25 g/litre cyfluthrin and 75 g/litre imidacloprid	HSR000342	-
	Suspension concentrate containing 600 g/litre imidacloprid	HSR000495	Gaucho
	Water dispersible granule containing 50 g/kg imidacloprid	HSR000496	Confidor Garden Insecticide
	Gel containing 21.5 g/kg imidacloprid	HSR000676	-
	Ready to use liquid containing 0.125 g/litre imidacloprid	HSR000682	Confidor Ready to Use Insecticide
	Flammable aerosol containing 0.25 g/kg imidacloprid	HSR000684	-

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Granular material containing 50 g/kg imidacloprid	HSR000686	-
Suspension concentrate containing 350 g/litre imidacloprid	HSR000687	-
IFB 0.5%	HSR001679	-
Flammable liquid containing 80 - 120 g/litre imidacloprid	HSR001870	-
Raid/Baygon Fly Baits - Cube	HSR002463	-
Raid/Baygon Fly Baits - Sticker: Rose, Bouquet, Flower, Shell and Orange	HSR002464	-
Maxforce Liquid Ant Bait	HSR007635	-
Imidakote	HSR007662	Pronto, Acclaim, AGPRO imidacloprid, Sombrero 600 Seed Dressing, Kiwiagri Imidacloprid 600 SC, Punto
NTN Pour on	HSR007664	-
TNL 2189	HSR007756	-
Preventol TM-CE 25	HSR007863	-
Gaucho Clear	HSR007890	-
Boron Glycol Option 1	HSR007928	-
Boron Glycol Option 2	HSR007929	-
Boron Glycol Option 3	HSR007930	-
Boron Glycol Option 4	HSR007931	-
Boron Glycol Option 5	HSR007932	-
Maxforce Quantum	HSR100039	-
Grass Slurry Gold	HSR007996	-
NTNCS2	HSR100103	Zapp Encore
Kemiholz Ply Lik	HSR100391	-
YATES ROSE GUN ADVANCED	HSR100399	Yates Rose Gun Advanced
PNR1427	HSR100529	-
QuickBayt Spray Fly Bait	HSR100747	-
Yates Complete Lawn Insect Control	HSR100711	Yates Complete Lawn Insect Control
J57.55	HSR100582	-

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	Yates Super Shield Advanced	HSR100613	-
	J57.56	HSR100617	-
	J57.59	HSR100689	-
	Joseph Lyddy Flea Control Deodorising Household Flea Spray	HSR101062	-
	FramePro Plus	HSR101074	-
	Vectothor Fly Bait	HSR101080	-
	EnviroMax Imidacloprid 200SC Termiticide & Insecticide	HSR101187	-
	Pronto	HSR100431	Savage 750 WG insecticide
	Permatek IM30	HSR100491	-
	Savage 600 Flowable Seed Dressing Insecticide	HSR100831	Radicle 600 FS Flowable Seed Dressing Insecticide
	Nuprid 350SC	HSR002691	Savage 350 Insecticide, Nuprid 350SC, Confidor
	Imidatar	HSR101008	Imidatar
	Nuprid 600ST (alternative formulation)	HSR100915	Senator 600
	Cyrus	HSR100355	Cyrus
Thiacloprid	Suspension concentrate containing 480 g/litre thiacloprid	HSR000715	Hortcare COMMEND, Alpasso, Topstar, Calypso
	Proteus	HSR007653	Proteus
	Preventol TX-CT 50	HSR007913	-
	Preventol TX-CE 12	HSR007912	-
	Insect Systemic Ready to Use	HSR100983	-
	Rose Systemic Ready to use	HSR100991	-
Acetamiprid	Scimitar	HSR007627	-
	SDB-1377	HSR002478	-
	Defender Maxguard RTU	HSR100662	-
	Defender Concentrate Maxguard	HSR100663	-
	Crown 225SL Systemic Insecticide	HSR100918	-
	RF-046	HSR101072	-
	RF-052	HSR101221	-
	RF-060	HSR101318	-

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- 1.6. The EPA has applied for grounds to reassess the neonicotinoids clothianidin, thiamethoxam, imidacloprid, thiacloprid, and acetamiprid.
- 1.7. The purpose of this application is to decide whether there are grounds for the reassessment of these substances.

2. Application process

- 2.1. The application was prepared by the EPA. It was formally received on 29 November 2019.
- 2.2. The application was considered on 16 December 2019 by a decision-making committee of the EPA.

3. Evaluation against the criteria in the Act

- 3.1. The Act specifies a number of factors that the EPA has to take into account when considering whether grounds exist for a reassessment. At least one of these factors must be present before the EPA can use its discretion to determine whether there are grounds for a reassessment.

Significant new information relating to the effects of the substance has become available (section 62(2)(a))

- 3.2. The EPA provided details of a number of recent reports from key international regulatory agencies. The reports include European Food Safety Authority (EFSA) pesticide risk assessments, European Chemicals Agency (ECHA) Committee for Risk Assessment (RAC) harmonised classification opinions, an ECHA Biocidal Products Committee (BPC) approval opinion, and Health Canada Pest Management Regulatory Agency (PMRA) re-evaluation and special review decisions and proposed decisions. Key information on the type of risks identified and the regulatory outcome is highlighted in the grounds for reassessment application. The reports were published between 2013 and 2019.
- 3.3. The EPA also provided details of previous applications and decisions for neonicotinoid-containing substances where non-negligible risks were identified in its risk assessment which outweighed the benefits of the substance. These documents were published between 2014 and 2018.
- 3.4. The Committee considered that the information provided is “significant” because the reports identify a number of issues relating to the environmental effects of the neonicotinoids including risks to pollinator species, risks of chronic adverse effects on aquatic invertebrates, and risks to surface water, sediment, groundwater, soil, and soil-dwelling organisms. The reports also identify issues relating to the human health effects of certain neonicotinoids, including the reproductive toxicity of thiacloprid and potential risks to toddlers via secondary exposure to acetamiprid-containing products.
- 3.5. The Committee also noted that the information supplied was published during 2013 to 2019 and was therefore not available during the initial approval of the neonicotinoids or for many of the neonicotinoid-containing substances. Therefore the Committee considered it to be “new” information.

A change in controls under the Health and Safety at Work Act 2015 (section 62(2)(aa))

- 3.6. This factor is not relevant to this application.

Another substance with similar or improved beneficial effects and reduced adverse effects has become available (section 62(2)(b))

- 3.7. This factor is not relevant to this application.

Information showing a significant change of use, or a significant change in the quantity manufactured, imported, or developed has become available (section 62(2)(c))

3.8. This factor is not relevant to this application.

Other reasons for requesting a reassessment under section 62(2)

3.9. This factor is not relevant to this application.

4. Issues and concerns to Māori

- 4.1. The Committee has considered Māori perspectives regarding the applicant's wish to determine whether there are grounds for the reassessment of the substance. The Committee noted that, if this application is approved and a subsequent reassessment applied for, wider public notification and/or consultation will be undertaken, including with Iwi/Māori.
- 4.2. The Committee considered that there were no issues related to the principles of the Treaty of Waitangi to be addressed in the context of this application. The Committee noted that these principles will be considered if a subsequent reassessment application is received.

5. International obligations

- 5.1. The Committee has considered New Zealand's international obligations in respect of this application to determine whether there are grounds for reassessment of the neonicotinoids.
- 5.2. The Committee noted that these international obligations will be considered if a subsequent reassessment application is received.

6. Consideration

- 6.1. The Committee considered that there is significant new information relating to the effects of the neonicotinoids in view of the information contained in the overseas regulatory reports.
- 6.2. Taking that into account, the Committee considered that grounds exist under section 62 of the Act for the reassessment of the neonicotinoid active ingredients clothianidin, thiamethoxam (HSR002755), imidacloprid (HSR003302), thiacloprid (HSR100091), and acetamiprid (HSR004088) and substances containing these active ingredients, on the basis that significant new information about their effects has become available (section 62(2)(a)).



Signed by:

Date: 16 December 2019

Dr Louise Malone
Chair, Decision-making Committee
Environmental Protection Authority