Responses to Zespri's supplementary questions on the EPA's hydrogen cyanamide reassessment application

Background

On 17 November 2021, the EPA published a response to Zespri International's letter of 14 October 2021 which contained a list of questions on the hydrogen cyanamide reassessment. The questions related mainly to the EPA's risk assessments, proposals, and definitions of technical terms used in the application documents.

Following this, Zespri International sent a further letter dated 17 November 2021 asking three supplementary questions which sought clarification on the EPA's answers.

To ensure that all potential submitters have equal access to information, these supplementary questions and answers are published below.

Zespri International also mentioned in their letter that the questions were being asked to inform their analysis of the modelling scenarios in the EPA's risk assessment. As discussed in more detail in the Decision-making Committee's Direction & Minute WGT002[1], if any potential submitter is commissioning their own analysis or expert reports, then these can be provided to the DMC as additional evidence separately to their submission.

1. In response to Question 7 of our last letter, the EPA said shelter has been considered in relation to the non-target plant, non-target arthropod and soil risk assessment, and this is referred to as off-field vegetation sheltering. In Appendix B – the Science Memo, when off-field vegetation is referred to, it is described as "developing grass acting as potentially sheltering soil". Could you please confirm that the EPA is not referring to shelterbelts (i.e. that they are not presently accounted for), but rather shelter conveyed by this developing grass with regard to spray?

We confirm that the models used by the EPA only account for crop interception, and this is not necessarily going to be representative of shelterbelts.

We would welcome submitters presenting any actual experimental data showing how the use of shelterbelts affects the spray drift curves.

[1] https://www.epa.govt.nz/assets/FileAPI/hsno-ar/APP203974/APP203974_20211124_Direction_and_Minute_WGT002.pdf

2. In response to Question 4 of our previous letter, the EPA advised us that the phrase describing data in Table 5 was quoted from information received from WorkSafe. Could you please provide us with details for the appropriate person at WorkSafe so we can contact them for more information?

In response to this question, Zespri has been provided with contact details for the relevant personnel at WorkSafe. If any other potential submitters need to get in touch with WorkSafe, they should initially contact reassessments@epa.govt.nz.

3. Could you please provide more information on the timing of the acute risks to birds that the EPA has modelled? Specifically, we are seeking insight on how the modelled risk decreases over time/as each day goes by.

As described in the EPA's Risk Assessment Methodology[2], the EPA uses the European Food Safety Authority's (EFSA's) risk assessment approach for birds. The methodology of the bird risk assessment is described in detail in EFSA's "Risk Assessment for Birds and Mammals" guidance document[3].

In the acute bird risk assessment, a default period of 1 day is used, meaning that it is assumed that mortality can occur within 24 hours of exposure.

[2] https://www.epa.govt.nz/assets/Uploads/Documents/Hazardous-Substances/Risk-Assessment-methodology/Risk-Assessment-Methodology-for-Hazardous-Substances-How-to-assess-the-risk-cost-and-benefit-of-new-hazardous-substances-for-use-in-New-Zealand-v2.docx
[3] https://www.efsa.europa.eu/en/efsajournal/pub/1438