

# Your submission to APP203974 - reassessment of hydrogen cyanamide

Submission no: 127776

Ref no: 73

MOP no: 28

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**Clause**

What is your position on the proposals set out in the reassessment application? Please outline your reasons in the text box below.

**Position**

I support the application

**Notes**

But I would like the ban of hydrogen cyanamide to be come reality earlier than in 5 years (2 years at the most)

**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**

**You have elected to withhold your personal details from publication.**

Supporting documents from your Submission

Submission\_to\_EPA\_reassessment\_of\_Hydrogen\_Cyana..

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## Submission to EPA reassessment of Hydrogen Cyanamide use in NZ.

After having read some interesting articles about this ingredient commonly used in the Kiwifruit industry in NZ I must say that I got a real shock and am glad that, with my husband, we are only buying organic kiwifruit.

I understand that Hydrogen Cyanamide (HC) is used in regions where there is not enough winter chill and that it stimulates a more homogenous bud burst.

- Why do people grow kiwifruit in areas that don't have enough winter chill (Bay of Plenty, Northland) in the first place? Instead of working with Nature they work against Nature. If nature does not provide enough winter chill, they simulate that by using extremely dangerous chemicals.
- With climate change happening and warmer temperatures being experienced, is it not time to start looking at alternatives? If we now need HC to get a regular bud burst, what will be needed if temperatures carry on going up? And they will.
- HC is a poison. Even with spraying restrictions and the use of protective equipment, orchard workers are at risk. And, as the COVID crisis has shown, a lot of orchard workers are overseas migrant workers. They also need to be protected. It is not by reclassifying HC as carcinogen that health risks diminish.
- Why does EPA suggest to wait 5 years before banning this chemical extremely dangerous to people and the environment? 'Using the existing stock' is not a valid reason for me. If it is that dangerous it needs to be banned as soon as possible.
- Protective measures include a 50 m boundary, spray when wind is less than 20 km/h, bees not present. Wind varies a lot depending on the time of the day. The day can start with no wind and suddenly wind gusts occur while spraying is in progress. The operator will carry on as he/she has been asked to do so. Where is the spray drift going to go? To the neighbouring properties? To Tauranga where I live?
- I read that HC has an effect on birds. What about insects, flora and fauna? What happens when it comes into contact with water, streams etc.?
- Why has HC been banned in Europe and its usage is being reviewed in the US?
- NZ Farmers always tell that European farmers have got a competitive advantage because they receive subsidies from the European Union. But in the case of HC, NZ farmers have got an advantage over European farmers who cannot use HC as it has been banned there. Is this fair?
- Instead of using chemicals to enable kiwifruit orchards to be economically viable, NZ researchers need to start looking at varieties of kiwifruit that can grow in warmer areas and don't need a chilling period. Otherwise the kiwifruit industry might have a few problems in a not too distant future.
- Organic growers are not allowed to use HC in NZ, how are they managing to run profitable businesses?

- Worldwide consumers are getting more aware of how their food is produced and NZ could use this as an opportunity by growing organic kiwifruit and export it at a premium.

The economic benefits of some (Kiwifruit growers) do not outweigh the social and environmental costs for the rest of New Zealand. For years NZ has been promoted overseas as clean and green. Sure! We'd better start putting into practice what we say we are!

In conclusion I support banning HC and understand that it cannot be done overnight. I do realise that growers need time to adapt but 5 years is far too long. I don't want to live in an area where poisonous spray drift is going to contaminate my organic garden. I suggest to ban HC within maximum 2 years instead. This give orchardists enough time to look at their operation and find socially and environmentally responsible alternatives.