

Submission form: For Hazardous Substances and New Organisms applications

Submission details

What application are you submitting on?: [APP204042 - Xivana](#)

Organisation or submitter name: [Fonterra Cooperative Group Ltd](#)

Contact person (for organisations only): [REDACTED]

Postal address (optional): Click or tap here to enter text.

City/Region (optional): Click or tap here to enter text.

Telephone number: [REDACTED]

Email: [REDACTED]

Privacy statement

The EPA is collecting your personal information for the purpose of administering this application under the Hazardous Substances and New Organisms Act and will use the information you provide in this form to contact you in relation to the application. We will store your personal information securely. Your submission and name will be made publicly available on our website, but your personal contact details will not be disclosed. You have the right to access the personal information we hold about you and to ask for it to be corrected if it is wrong. If you would like to access your personal information, or have it corrected, please contact us at info@epa.govt.nz.

Confidential details

The Official Information Act 1982 (OIA) applies to all information held by the EPA (subject to section 55 of the Hazardous Substances and New Organisms Act 1996), and information may be released under the OIA unless there are grounds to withhold it. If you consider any part of your submission is confidential, please clearly label it as such and include the reasons why you think the information is confidential (eg, you may consider some information to be commercially sensitive). Further information on the OIA is at www.ombudsman.parliament.nz

Your submission

What is your view on what is proposed in the application form?

- 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 supplied with your submission, see footnote).*

There is a need to protect New Zealand's biodiversity and primary production given the volume of primary products exported. Our reputation as a producer of safe food relies on the integrity of our environment and its impact to our primary production system.

We do not believe that New Zealand should be the first country to accept a new fungicide that has not been approved by any overseas jurisdiction. Being first means that New Zealand permit something that our major trading partners do not, and also risks the acceptance of dairy products if they contain unacceptable residues of floxapiprolin. Zero tolerance is often applied where unexpected residues are found in food products, this is a concern for New Zealand food exports.

Dairy was the top export product for the quarter ending September 2021 with a value of \$3.04 billion².

Of the target commodities, Onions and Potatoes can be used as feed supplements which risks a residue in milk³.

I wish for the EPA to make the following decision:

Defer consideration of the application until after a major trading partner (EFSA for the EU) has approved and the residue risk in food and dairy products is quantified.

¹ Further information can be supplied with your submission. If you are sending this submission electronically, please attach one or more files in any standard file format.

² Stats NZ Trade Dashboard - https://statisticsnz.shinyapps.io/trade_dashboard/

³ DairyNZ common feed supplements - <https://www.dairynz.co.nz/feed/supplements/common-feed-supplements/>

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 present your submission to the DMC at the hearing but does not allow you to introduce new information 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 want to appear at a hearing.

Send your completed form

You can send us the completed form by either post or email.

Post	Email
 Environmental Protection Authority, Private Bag 63002, Wellington 6140	 submissions@epa.govt.nz