Environmental Protection Authority
Te Mana Rauhī Taiao

APPLICATION FORM
Pesticides

To obtain approval to import or manufacture a pesticide

Send to Environmental Protection Authority preferably by email (HSApplications@epa.govt.nz) or alternatively by post (Private Bag 63002, Wellington 6140)
Payment must accompany application; see our fees and charges schedule for details.

This form should also be used for

- Antifouling paints ☐
- Fumigants ☐
- Plant protection products ☐
- Timber treatments ☐
- Vertebrate Toxic Agents ☐

Name of the substance to be approved

Mortein Powergard All in One Insect Killer

Date

05/08/2020

Completing this application form

1. This form has been approved under section 28 of the Hazardous Substances and New Organisms (HSNO) Act 1996. It only covers the import or manufacture of pesticides to be released in New Zealand under section 28 of the HSNO Act. If you wish to make an application for another type of substance (such as a veterinary medicine or industrial chemical) or for another type of application (such as emergency, special emergency or containment), a different form will have to be used. All forms are available on our website.
2. It is recommended that you contact an Applications Advisor at the Environmental Protection Authority (EPA) as early in the application process as possible. An Applications Advisor can assist you with any questions you have during the preparation of your application including advising on any consultation requirements.
3. Before submitting this application, you may make an informal Status of Substance (SOS) advice request to the EPA. Further information on this process is available on our website. Please note that this is not mandatory and an SOS request is only informal advice.
4. This application form may be used to seek approvals for more than one hazardous substance, if the substances and their uses are of a similar nature.
5. Please make sure that you obtain all appropriate permissions for the use of any data that you have used or provided in this application form, if you are not the owner of such data.
6. Unless otherwise indicated, all sections of this form must be completed for the application to be formally received and assessed. If a section is not relevant to your application, please provide a comprehensive explanation why this does not apply. If you choose not to provide the specific information, you will need to apply for a waiver under section 59(3)(a)(ii) of the HSNO Act. This can be done by completing the section on the last page of this form.
7. Any extra material that does not fit in the application form must be clearly labelled, cross-referenced, and included with the application form when it is submitted.
8. Please add extra rows or tables where needed.
9. You must sign the form (the EPA will accept electronically signed forms) and enclose the application fee (including GST) unless you are already an approved EPA customer. To be recognised by the EPA as an “Approved customer”, you must have submitted more than one application per month over the preceding six months, and have no history of delay in making payments, at the time of presenting an application.
10. Information about application fees is available on the EPA website. If you wish to claim a fee reduction for a reduced-risk-formulated product the appropriate justification must be submitted at the pre-lodgement stage for consideration.
11. All application communications from the EPA will be provided electronically, unless you specifically request otherwise.

Commercially sensitive information

12. The EPA strongly advises applicants to provide as much information relating to the hazard classification and use of their substance as possible to help inform the EPA's assessment as well as for submitters and decision-makers. We expect this information to be publicly available in the application unless there is a genuine argument for it to be considered as commercially sensitive.
13. Commercially sensitive information may be put in a confidential appendix to this form (also available on our website) and be identified as confidential. If you consider any information to be commercially sensitive, please show this in the relevant section of this form providing your detailed reasons for considering it to be commercially sensitive and cross referencing to where that information is located in the confidential section.
14. Any information you supply to the EPA prior to formal lodgement of your application will not be publicly released, unless it has already been made publicly available as part of the consultation process. Following formal lodgement of your application any information in the body of this application form and any non-confidential appendices will become publicly available.
15. Once you have formally lodged your application with the EPA, any information you have supplied to the EPA about your application is subject to the Official Information Act 1982 (OIA). If a request is made for the release of information that you consider to be confidential, your view will be considered in a manner consistent with the OIA and with section 57 of the HSNO Act. You may be required to provide further justification for your claim of confidentiality.

Definitions

Active ingredient	Component of a formulated substance responsible for the pesticidal effect
CAS Number	Chemical Abstracts Service number. This is a unique identifier for a chemical substance
CIPAC Number	Collaborative International Pesticides Analytical Council. The CIPAC code number system is a simple approach for an unambiguous coding of active ingredients and variants used in the area/field of pesticides
Hazardous substance	Any substance with one or more of the following intrinsic properties: • Explosiveness • Flammability • A capacity to oxidise • Corrosiveness • Toxicity (including chronic toxicity) • Ecotoxicity, with or without bioaccumulation, or • which on contact with air or water (other than air or water where the temperature or pressure has been artificially increased or decreased) generates a substance with any one or more of the properties specified in this definition

EINECS	European INventory of Existing Commercial chemical Substances
ELINCS	European List of Notified Chemical Substances
IUPAC	International Union of Pure and Applied Chemistry. The world authority on chemical nomenclature
Pesticide	Substance or mixture of substances intended to be used for preventing, controlling, repelling or mitigating any pest (including vertebrates) in areas such as, but not limited to, agriculture, home and garden, rights of way or industrial areas
Professional and non-professional users	Professional users are using pesticides in the course of their job or business (such as farmers and growers or amenity users). Professional use may include the use of formulated substances in order to deliver services to business or private customers Non-professional users are not using pesticides in the course of their job or business (such as lifestyle block owners, general public using pesticides for domestic use, and so on)
Public register name	Name of the formulated substance to be mentioned in a publicly available register and that can be different from the final marketing name
Relabelling	Action of changing the label of a formulated substance intended to be imported in New Zealand in order to meet the EPA criteria for information content. This action can also occur when the formulated substance is repacked into packaging of different sizes
Repackaging	Movement or transfer of a substance from one container to another without a change in composition of the formulation or the labelling content, for sale or distribution
Status Of Substance (SOS) advice	The advice provided in a SOS advice request will include: • Whether or not a substance is hazardous • Whether the substance is covered or not by an existing approval • The hazard classifications of the substance • The potential relevant approval pathway for the substance
Substance	Any of the following: • Any element, defined mixture of elements, compounds or defined mixture of compounds, either naturally occurring or produced synthetically, or any mixtures thereof; • Any isotope, allotrope, isomer, congener, radical or ion of an element or compound which has been declared by the Authority, by notice in the Gazette, to be a different substance from that element or compound; • Any mixtures or combinations of any of the above; • Any manufactured article containing, incorporating or including any hazardous substance with explosive properties. (section 2(1) HSNO Act)

1. Applicant details

1.1. Applicant

Company Name: RB (Hygiene Home) New Zealand Limited

Contact Name: [redacted]

Job Title: [redacted]

Postal Address (provide only if not the same as the physical)**:** [redacted]

Physical Address: [redacted]

Phone (office and / or mobile)**:** [redacted]

Fax: N/A [redacted]

Email:

1.2. New Zealand agent or consultant (if applicable)

Company Name:

Contact Name:

Job Title:

Postal Address (provide only if not the same as the physical)**:**

Physical Address:

Phone (office and / or mobile)**:**

Fax:

Email:

1.3. Formal correspondence contact

All formal correspondence will be sent to the contact person for the application identified here

Company Name: RB (Hygiene Home) Australia Pty Ltd

Contact Name: [redacted]

Job Title: [redacted]

Postal Address (provide only if not the same as the physical)**:** [redacted],

Physical Address: [redacted]

Phone (office and / or mobile)**:**

Fax: N/A

Email: [redacted]

1.4. Invoice contact

Only if different from 1.3. Formal correspondence contact - invoice will be sent to the contact person identified here

Company Name:

Contact Name:

Job Title:

Postal Address (provide only if not the same as the physical)**:**

Physical Address:

Phone (office and / or mobile)**:**

Fax:

Email:

2. Information about the substance

2.1. Purpose statement or executive summary of the application for the public register

No more than 1,100 characters including the description of the formulated substance to be approved, e.g. Soluble Concentrate 350-400 g active ingredient/L

To obtain approval to import pre-packaged aerosol insecticide containing 1.2 g/kg esbiothrin, 0.5 g/kg permethrin and 0.2 g/kg imiprothrin for the control of flying and crawling insects in household situations.

2.2. Type of application

Tick the box(es) that best describe your application

Has 'Status of Substance (SOS) Advice' been obtained from the EPA?

☒ Yes ☐ No

If yes, show the SOS reference number:

APP204017

If yes, is the formulation of the substance different to that submitted at the SOS stage?

(In either case, please provide the composition to the EPA. This may be provided as part of the confidential appendix)

☐ Yes ☒ No

Is the product a new active ingredient to New Zealand?

☐ Yes ☒ No

Does the product contain any viable new organisms, including GMOs?

☐ Yes ☒ No

Does the product contain an ingredient originating from an organism (plant, animal, etc)?[1]

☐ Yes ☒ No

[1] If you tick 'Yes' and the product is being imported, then include a Biosecurity Clearance from the Ministry for Primary Industries New Zealand. If one has been provided with a previous application and is still valid, this may be referenced.

Does the formulated substance contain any nanomaterial?

☐ Yes ☒ No

3. Identity of the substance

Any commercially sensitive information may be provided in the confidential appendix of this form
Provide details on the active ingredient(s) as well as the mixture in this section

3.1. Identity of the active ingredient(s)

There are 3 active ingredients in this product, esbiothrin, permethrin and imiprothrin.

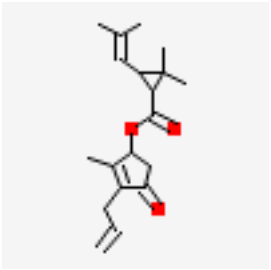
1. Active ingredient (Common Name): Esbiothrin

Chemical name (IUPAC): (RS)-3-allyl-2-methyl-4-oxocyclopent-2-enyl-(1R,3R)-2,2-dimethyl-3-(2-methylprop-1-enyl)-(1R,3R)-2,2-dimethyl-3-(2-methylprop-1-enyl)

Chemical name (CA): Cyclopropanecarboxylic acid, 2,2-dimethyl-3-(2-methyl-1-propenyl)-, [2,5-dioxo-3-(2-propynyl)-1-imidazolidinyl]methyl ester

Molecular formula: $C_{19}H_{26}O_3$

Structural formula:



Manufacturer development codes:

CIPAC No: None allocated

CAS No: 84030-86-4

EEC No (EINECS or ELINCS): EC 617-522-5

Function:

Esbiothrin is a synthetic pyrethroid insecticide. It is an ingredient in some insecticide products for indoor use. It has low acute toxicity to humans, but to insects it acts as a

neurotoxin causing paralysis. Esbiothrin is an Allethrin which causes blocking of the sodium channels at the nerve endings causing hyperactivity, paralysis, or death.

For plant protection products

☐ Herbicide ☐ Microbial strain ☐ Fungicide

☐ Insecticide ☐ Semiochemical (pheromone, attractant, repellent etc.) ☐ Plant Extracts

☐ Other, eg plant growth regulators (specify):

For timber treatments, Vertebrate Toxic Agents (VTA), anti-fouling paints or fumigants, please describe the function:

FAO Specification (including year of publication): ☐ Yes Year: ☒ No

Minimum purity of the active ingredient as manufactured (g/kg): 930 g/kg

Note: Any impurities must be provided to the EPA. A certificate of analysis may be included in the confidential appendix.

Certificate of Analysis included in Confidential Appendix

3.2. Regulatory status of the active ingredient(s)

Jurisdiction	Regulatory status					Comment*
	Never approved	Pending	Approved	Restricted	Not renewed	
Australia	☐	☐	☒	☐	☐	APVMA No: 63031
Canada	☐	☐	☒	☐	☐	
Europe	☐	☐	☒	☐	☐	
Japan	☐	☐	☐	☐	☐	
New Zealand	☐	☐	☒	☐	☐	
USA	☐	☐	☒	☐	☐	US EPA: 004007
Other jurisdictions	☐	☐	☐	☐	☐	

(specify in comments)						

*For instance, specify here under which regulation(s) or directive(s).

When restricted or not renewed, explanations should be provided:

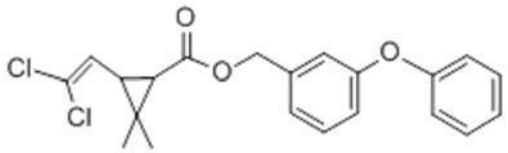
2. Active ingredient (Common Name): Permethrin

Chemical name (IUPAC): 3-phenoxybenzyl (1RS,3RS;1RS,3SR)-3-(2,2-dichlorovinyl)-2,2-dimethylcyclopropanecarboxylate

Chemical name (CA): (3-phenoxyphenyl)methyl 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate

Molecular formula: $C_{21}H_20Cl_2O_3$

Structural formula:



Manufacturer development codes:

CIPAC No: 331

CAS No: 52645-53-1

EEC No (EINECS or ELINCS): EC 258-067-9

Function:

Permethrin is a synthetic pyrethroid insecticide. It is an ingredient in some insecticide products for indoor use. It has low acute toxicity to humans. Permethrin acts on the nervous system of insects. It interferes with sodium channels to disrupt the function of neurons, and causes muscles to spasm, culminating in paralysis and death.

For plant protection products

☐ Herbicide ☐ Microbial strain ☐ Fungicide

☐ Insecticide ☐ Semiochemical (pheromone, attractant, repellent etc.) ☐ Plant Extracts

☐ Other, eg plant growth regulators (specify):

For timber treatments, Vertebrate Toxic Agents (VTA), anti-fouling paints or fumigants, please describe the function:

FAO Specification (including year of publication): ☒ Yes Year: 2019 ☐ No

Minimum purity of the active ingredient as manufactured (g/kg): 930 g/kg

Note: Any impurities must be provided to the EPA. A certificate of analysis may be included in the confidential appendix.

Certificate of Analysis included in Confidential Appendix

3.1. Regulatory status of the active ingredient(s)

Jurisdiction	Regulatory status					Comment*
	Never approved	Pending	Approved	Restricted	Not renewed	
Australia	☐	☐	☒	☐	☐	APVMA No: 52486
Canada	☐	☐	☒	☐	☐	
Europe	☐	☐	☒	☐	☐	
Japan	☐	☐	☐	☐	☐	
New Zealand	☐	☐	☒	☐	☐	
USA	☐	☐	☒	☐	☐	US EPA: 109701
Other jurisdictions (specify in comments)	☐	☐	☐	☐	☐	

*For instance, specify here under which regulation(s) or directive(s).

When restricted or not renewed, explanations should be provided:

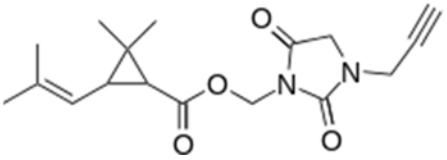
3. Active ingredient (Common Name): Imiprothrin

Chemical name (IUPAC): Cyclopropanecarboxylic acid, 2,2-dimethyl-3-(2-methyl-1-propenyl)-, [2,5-dioxo-3-(2-propynyl)-1-imidazolidinyl]methyl ester

Chemical name (CA): Cyclopropanecarboxylic acid, 2,2-dimethyl-3-(2-methyl-1-propenyl)-, [2,5-dioxo-3-(2-propynyl)-1-imidazolidinyl]methyl ester

Molecular formula: $C_{17}H_{22}N_2O_4$

Structural formula:



Manufacturer development codes:

CIPAC No: None allocated

CAS No: 72963-72-5

EEC No (EINECS or ELINCS): EC 428-790-6

Function:

Imiprothrin is a synthetic pyrethroid insecticide. It is an ingredient in some insecticide products for indoor use. It has low acute toxicity to humans, but to insects it acts as a neurotoxin causing paralysis. Imiprothrin controls insects by contact and stomach poison activity. It acts by paralyzing the nervous systems of insects.

For plant protection products

☐ Herbicide	☐ Microbial strain	☐ Fungicide
☐ Insecticide	☐ Semiochemical (pheromone, attractant, repellent etc.)	☐ Plant Extracts

☐ Other, eg plant growth regulators (specify):

For timber treatments, Vertebrate Toxic Agents (VTA), anti-fouling paints or fumigants, please describe the function:

FAO Specification (including year of publication): ☐ Yes Year: ☒ No

Minimum purity of the active ingredient as manufactured (g/kg): 500 g/kg

Note: Any impurities must be provided to the EPA. A certificate of analysis may be included in the confidential appendix.

Certificate of Analysis included in Confidential Appendix

3.1. Regulatory status of the active ingredient(s)

Jurisdiction	Regulatory status					Comment*
	Never approved	Pending	Approved	Restricted	Not renewed	
Australia	☐	☐	☒	☐	☐	APVMA No: 50876
Canada	☐	☐	☒	☐	☐	
Europe	☐	☐	☒	☐	☐	
Japan	☐	☐	☐	☐	☐	
New Zealand	☐	☐	☒	☐	☐	
USA	☐	☐	☒	☐	☐	US EPA: 004006
Other jurisdictions (specify in comments)	☐	☐	☐	☐	☐	

*For instance, specify here under which regulation(s) or directive(s).

When restricted or not renewed, explanations should be provided:

3.2. Identity of the formulated substance

Formulated substance name: RB-20-001

Manufacturer development codes: 3130684

Unique names for public register: RB-20-001

Active ingredient(s) and content (g/kg or L and % w/w): g/kg or L % (w/w)

Active ingredients as declared on the label.

Esbiothrin 1.2 g/kg 0.12% (w/w)

Permethrin 0.5g/kg 0.05% (w/w)

Imiprothrin 0.2 g/kg 0.02% (w/w)

3.3. Physical and chemical properties of the formulated substance

Provide as much information as possible on the physical and chemical properties of the substance (at 20°C and 1 atmosphere unless otherwise stated)

Appearance (colour, odour, physical state and form): Aerosol

pH: Not applicable

Density: Not available

Vapour pressure: Not available

Boiling/melting point: Not available

Solubility in water: Immiscible

Water/Octanol partitioning co-efficient: Not available

3.4. Regulatory status of the formulated substance

Jurisdiction	Regulatory status					Comment*
	Never approved	Pending	Approved	Restricted	Not renewed	
Australia	☐	☐	☒	☐	☐	APVMA No 89128
Canada	☐	☐	☐	☐	☐	
Europe	☐	☐	☐	☐	☐	
Japan	☐	☐	☐	☐	☐	
New Zealand	☐	☐	☐	☐	☐	
USA	☐	☐	☐	☐	☐	
Other jurisdictions (specify in comments)	☐	☐	☐	☐	☐	

*For instance, specify here under which regulation(s) or directive(s).

Has an application been made for an approval under the Agricultural Compounds and Veterinary Medicines Act?

☐ Yes ☒ No

3.5. Composition details of the formulated substance

Full composition details for the substance must be provided to the EPA. These may be included in the confidential appendix

See Confidential Appendix

4. Life cycle of the substance

Manufacturing

Will your formulated substance be manufactured in New Zealand?

☐ Yes ☒ No

Importation

Will your formulated substance be imported into New Zealand by air and/or sea?

☒ Sea ☐ Air

Will your formulated substance be imported in bulk containers or packaged ready for sale?

☐ Bulk Containers ☒ Packaged ready for sale

If your formulated substance will be imported in bulk containers, please describe these containers:

Will repackaging of your formulated substance be carried out in New Zealand?

☐ Yes ☒ No

Will relabelling of your formulated product be carried out in New Zealand?

☐ Yes ☒ No

Please provide any additional relevant information relating to the importation of your formulated substance:

Transport

Will your formulated substance be transported by road, rail, air and/or sea within New Zealand?

☒ Road ☒ Sea ☒ Rail ☐ Air

Please provide any additional information relating to transport of your formulated substance:

UN Number: UN1950 AEROSOLS

UN Transport Hazard Classes: 2.1 Flammable gas

UN Packing Group Number (UN Model Regulations[2]):

Marine Pollutant? (IMDG Code[3]): Not required for the proposed pack sizes <5L or 5kg

Packaging

Pack sizes: 200 – 370g

Type of packaging: Tinplate aerosols can

Type of closure (consider opening size, type of cap, child resistant packaging): Integrated actuator and aerosol cap

Please provide any additional information relating to the packaging of your formulated substance:

Storage

Provide details of how the substance will be stored, and the facilities it will be stored in:

Storage instructions as per label are:

STORAGE AND DISPOSAL: PRESSURISED DISPENSER. Keep in a cool place away from heat out of reach of children. PROTECT FROM SUNLIGHT AND DO NOT EXPOSE TO TEMPERATURES EXCEEDING 50°C such as may occur in cars, or near heat sources such as heaters, stoves or open flames. DO NOT STORE NEAR NAKED FLAME, HEAT OR INCANDESCENT MATERIAL. KEEP AWAY FROM SOURCES OF IGNITION – NO SMOKING. DO NOT PIERCE OR BURN, EVEN AFTER USE. Aerosols should be completely empty before disposing. Recycle empty cans if a facility is available, or place can in household rubbish.

Warehouse storage

Provide details of how the formulated substance will be stored: Product will be stored on pallets in designated areas in HSNO compliant warehousing.

Containment of spillages: As per SDS

Decontamination of areas, personnel, vehicles and buildings: As per SDS

Disposal

[2] UN Model Regulations mean Model Regulations annexed to the most recently revised edition of the Recommendations on the Transport of Dangerous Goods published by the UN
[3] IMDG Code means that International Maritime Dangerous Goods code, as amended

Disposal of damaged packaging, contaminated absorbents and other materials: As per SDS

Detailed instructions for safe disposal of the formulated substance and its packaging: It is expected that the product will be completely used by the consumer.

Disposal instructions as per label are:

Aerosols should be completely empty before disposing. Recycle empty cans if a facility is available, or place can in household rubbish.

Methods other than controlled incineration for disposal:

5. Intended uses of the formulated substance

The information you provide here will be used by the EPA to assess the risks posed by the substance and the controls assigned to manage these risks. You must outline either all the proposed uses of the product or the worst-case scenario for each application method (considering both the application rate and the frequency). **Please use table 5.1 for plant protection products or table 5.2 for all other types of pesticides.** Explanatory notes are below each table.

5.1. Intended uses for plant protection products

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency)

Crop and/or situation (a)	Product Code	F G or I (b)	Pest or group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI (days) (l)	Remarks (m)
				Type (d-f)	Conc of as (i)	Method kind (f-h)	Growth stage and season (j)	Number min max (k)	Interval between applications (min)	Kg as/hL min max	Water L/ha min max	Kg as/ha min max		

Crop and/or situation (a)	Product Code	F G or I (b)	Pest or group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI (days) (l)	Remarks (m)
				Type (d-f)	Conc of as (i)	Method kind (f-h)	Growth stage and season (j)	Number min max (k)	Interval between applications (min)	Kg as/hL min max	Water L/ha min max	Kg as/ha min max		

(a) For crops, the EU and Codex classifications (both) should be used; where relevant, the use situation should be described (*eg* fumigation of a structure)
(b) Outdoor or field use (F), glasshouse application (G) or indoor application (I)
(c) eg biting and suckling insects, soil born insects, foliar fungi, weeds
(d) eg wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
(e) GCPF Codes - GIFAP Technical Monograph No 2, 1989
(f) All abbreviations used must be explained
(g) Method, eg high volume spraying, low volume spraying, spreading, dusting, drench
(h) Kind, eg overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be described
(i) g/kg or g/l
(j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, season at time of application
(k) The minimum and maximum number of applications possible under practical conditions of use must be provided
(l) PHI - minimum pre-harvest interval
(m) Remarks may include: extent of use, economic importance and restrictions

5.2. Intended use for pesticides not used as plant protection products (eg timber treatments, Vertebrate Toxic Agents (VTA), anti-fouling paints or fumigants)

You must outline either all the proposed uses of the product or the worst case scenario for each application method (considering both the application rate and frequency)

User (a)	Area of Use (b)	Pest or group of pests controlled (c)	Application			Application rate per treatment (f)	Remarks (g)
			Method (d)	Number min max (e)	Interval between applications - days (minimum)		
Non-professional	Domestic	Flying and crawling insects	Low volume	Not specified	Product is intended for direct spray for fast kill of flying and crawling insects	Direct spray onto insects Spray rate 3.0-4.0 g/s (25 C)	

(a) Professional/non professional
(b) Domestic/commercial/industrial
(c) e.g. biting and suckling insects, soil born insects, foliar fungi, weeds
(d) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
(e) The minimum and maximum number of applications possible under practical conditions of use must be provided
(f) g/kg and g/l or others
(g) Remarks may include; extent of use, economic importance and restrictions

6. HSNO hazard classifications of the formulated substance

The information you provide here will form the basis of your substance's HSNO classification.

Please consider each of the hazardous properties in the table below and provide information on those properties that trigger any threshold level for your substance. Use the justification column to record the reason for your classification. If your substance is a mixture, you can apply mixture rules to the hazardous components of the mixture. If you do this, you will need to provide information on the hazardous properties of each hazardous component of the mixture, and show your workings. See AssigningAProducttoanHSNOApproval on our website for more information.

Please use the following abbreviations if needed.

NA: Not Applicable – For instance when testing is technically not possible: testing for a specific endpoint may be omitted, if it is technically not possible to conduct the study as a consequence of the properties of the substance: eg very volatile, highly reactive or unstable substances cannot be used, mixing of the substance with water may cause danger of fire or explosion or the radio-labelling of the substance required in certain studies may not be possible.

ND: No Data or poor quality data (according to Klimisch criteria) – where there is a lack of data.

No: Not Classified based on actual relevant data available for the substance – the data is conclusive and shows the threshold for classification is not triggered.

Hazard Class/Subclass	Formulated substance classification	Justification
Examples	3.1C 6.1D	Flashpoint = 46 deg C (closed cup) Calculated LD50 = 1250 mg/kg (mixture rules)
Class 1 Explosiveness		
Class 2, 3 & 4 Flammability	2.1.2A	APP204017
Class 5 Oxidisers/Organic Peroxides		
Subclass 8.1 Metallic corrosiveness		
Subclass 6.1 Acute toxicity (oral)		
Subclass 6.1Acute toxicity (dermal)		
Subclass 6.1 Acute toxicity (inhalation)		
Subclass 6.1 Aspiration hazard		
Subclass 6.3/8.2 Skin irritancy/corrosion	6.3A	APP204017

Subclass 6.4/8.3 Eye irritancy/corrosion	6.4A	APP204017
Subclass 6.5A Respiratory sensitisation		
Subclass 6.5B Contact sensitisation	6.5B	APP204017
Subclass 6.6 Mutagenicity		
Subclass 6.7 Carcinogenicity		
Subclass 6.8 Reproductive or developmental toxicity		
Subclass 6.8 Reproductive or developmental toxicity (known, presumed or suspected)		
Subclass 6.8 Reproductive or developmental toxicity (*via* lactation)		
Subclass 6.9 Target organ systemic toxicity[4]		
Subclass 9.1 Aquatic ecotoxicity	9.1A	APP204017
Subclass 9.2 Soil ecotoxicity		
Subclass 9.3 Terrestrial vertebrate ecotoxicity		
Subclass 9.4 Terrestrial invertebrate ecotoxicity	9.4B	APP204017

[4] identify classification for single and/or repeat dose target organ toxicity for oral, dermal or inhalation routes

7. Risks, costs and benefits

These are the positive and adverse effects referred to in the HSNO Act. It is easier to regard risks and costs as being adverse (or negative) and benefits as being positive. In considering risks, cost and benefits, it is important to look at both the likelihood of occurrence (probability) and the potential magnitude of the consequences, and to look at distribution effects (who bears the costs, benefits and risks).

You will need to consider the effects on the environment and human health and welfare, including any social effects.

In each section below, set out the information under the following three sub-headings:

- Costs and benefits which can be stated in monetary (dollar) terms
- Non-monetary risks and costs
- Non-monetary benefits.

You must fully complete this section, referencing supporting material. You will need to provide a description of where the information in the application has been sourced from, e.g. from; in-house research, independent research, technical literature, community or other consultation, and provide that information with this application.

7.1. Identify all of the potential risks, costs and benefits of the substance(s)

Identification is the first step in assessing risks, costs and benefits. It is important to think about the source of the risk, i.e. the way in which the risk is created (the exposure pathway), and then the consequences and likelihood of exposure.

You should try to think as widely as possible about every potential risk, cost and benefit and give a brief description.

Identification of the potential risks:

Risk	Potential effect	Likelihood of an adverse effect	Magnitude of effect	Risk
Incident during importation	Potential exposure of humans and/ or aquatic environments	Improbable, due to packaging design and safety measures in place during transport	Minimal	Very low
Incident during warehousing	Potential exposure of humans and/ or aquatic environments	Improbable, due to packaging design and safety measures in place during warehousing	Minimal	Very low

Incident during transport	Potential exposure of humans and/ or aquatic environments	Improbable, due to packaging design and safety measures in place during transport	Minimal	Very low
Misuse of product by consumers	Potential exposure of humans and/ or aquatic environments	Highly improbable, due to packaging design and label usage instructions and safety warnings	Minimal	Very low

Identification of the costs:

The controls imposed on the proposed product use via the HSNO Acts require the substance to be used in a prescribed manner that minimises potential use related costs to the economy, society and environment of New Zealand.

Identification of the benefits:

The proposed product is a domestic aerosol insecticide. The product is an insect killer to target both flying and crawling insects, along with the germs they carry. Benefits are summarised in the following table.

Benefit	**Significance of benefit**	**Beneficiaries**
Controls flying and crawling insects, along with the germs they carry, which can be potentially harmful to human health	Potentially significant	Humans
Economic	Potentially significant	Humans

7.2. Provide an assessment of those risks, costs, and benefits identified in Section 7.1

This section excludes risks, costs, and benefits which relate specifically to Māori taonga or to international

agreements. See Sections 7.3 and 7.4 for those aspects.

A full assessment must be provided of all the risks, costs and benefits identified in Section 7.1.For the risk assessment our preferred format is quantitative, however, you may also provide a qualitative assessment if you can justify this. If you are providing your risk assessment in supporting documentation with this application you can provide a summary of all the risks this in this section.

Please note that if you do not complete a full assessment of all risk, costs and benefits this may result in the EPA requesting further information from you, which will mean that your application takes longer to process.

A qualitative assessment of risks, costs and benefits is included in section 7.1.

The risk assessment outlines that the benefits outweigh potential risks.

7.3. Provide an assessment of any risks, costs and benefits which arise from the kaitiaki relationship of Māori and their culture to the environment

Please note that consultation with Māori may be appropriate for this application. Please refer to the EPA policy 'Engaging with Māori for applications to the EPA' which can be found on the EPA website (www.epa.govt.nz) or contact the EPA for advice.

An example of the issues to consider include whether the substance poses any risk to native or valued species, or waterways.

The proposed formulation and potential effects have been assessed against the relationship of Maori and their culture to the environment, in accordance with the EPA policy *Engaging with Maori for applications to the EPA.*

The application is not considered to have an impact on relationships between Maori and their traditional and contemporary knowledge systems, cultural concepts, ancestral lands, waters, historical sites, wahi tapu, valued flora and fauna and other taonga. This is a result of the proposed product being imported and used according to the label directions, in domestic applications and in accordance with established HSNO controls and legislative requirements.

Therefore, the Applicant considers that there is no requirement to consult with the Maori regarding this application.

7.4. Provide an assessment of any risks, costs or benefits to New Zealand's international obligations

Please show if approving or declining the substance would have any impact upon New Zealand's international obligations

A Risk Assessment outlining risks, costs and benefits is included in Section 7.1.

7.5. Provide information on the proposed management of the substance

Please outline how the risks of the substance will be managed. This may include default controls triggered by the hazardous property classification(s) and reference to Codes of Practice or to standard operating procedures that will be followed

The substance will be subject to default controls, requirements under Hazardous Substances Regulations and EPA Notices.

The transport & storage risks will be managed by relevant transport regulations and UN requirements for the transportation of dangerous goods products.

Finally product misuse and disposal risks of the product will be managed by labelling outlining instructions for use, precautions, storage and disposal, first aid and safety directions.

7.6. Provide an overall evaluation of the combined impact of all of the risks, costs and benefits set out in sections 7.2, 7.3 and 7.4

Please express a view on the relative importance of the different risks, costs and benefits and how they should be brought together in making a decision

Outlined below is an overall evaluation of the risks, costs and benefits likely associated with this application.

Risks:

1. Transport & storage – Potential exposure of the product to people and the environment during importation, transport, warehousing and storage of the product. The format of the aerosol (a pre-packed, domestic-size aerosol) and relevant legislation is likely to result in a low overall risk.

2. Product misuse – The product is labelled for correct use of the product and warnings against product misuse. Again, we consider this a low risk.

3. Disposal – The product is labelled for responsible use of the product. It is expected that consumers would use the entire contents of the product before disposal of the packaging.

Benefits:

1. Properties of product – The product is a "multi-insect" killer, targeting both common flying and crawling insects which are common is domestic applications. This product has been demonstrated to also kill germs carried on some common insects, helping to treat insect infestations and reduce the spread of germs.

2. Access to innovation in line with other markets – This product has been approved in Australia. There is overall benefit for New Zealand consumers to have access to this product for the benefits of household pest control.

It is the opinion of the Applicant that the benefits outweigh the potential risks and that it is not considered to negatively effect the relationship of Maori and their culture to the environment

8. Pathway determination and rapid assessment

Under the HSNO Act, applications may be processed under different pathways, including a rapid assessment. The pathway for your application will be determined after its formal receipt, based on the data provided in this application form. If you would like your application to be considered for rapid assessment (as per the criteria below), we require you to complete the attached statutory declaration and provide a signed hard copy.

Please note that the EPA will not be able to proceed with the rapid assessment without the statutory declaration.

8.1. Rapid assessment

Under the HSNO Act, a hazardous substance may be approved under a rapid assessment if one of the three following options is satisfied. Please show the section that is relevant to your application.

A substance having a similar composition and similar hazardous properties has been approved	☒ Yes ☐ No If Yes, please give the name of the reference substance: HSR100608
The substance has one or more hazardous properties and each has the least degree of hazard for that property; or	☐ Yes ☒ No
The substance has been formulated so that one or more of its hazardous properties has a lesser degree of hazard than any substance that has been approved under the Act.	☐ Yes ☒ No If Yes, please give the name of the reference substance:

8.2. Statutory Declaration

I [redacted] [address], Regulatory Affairs Associate [occupation/position]. being the applicant or authorised to do so on behalf of the applicant, verify that the information contained in this application for Mortein Powergard All In One Insect Killer [substance name] is true and correct. I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declarations Act 1957.

Signature [redacted]

Declared at 1'1? /f,V /If" t-<1) on this /S day of l'?vtf V£ ?z) before me.

Wfines [redacted]

[name] liat1 iste1 or Selieito1 of tile High Court of New Zealand

[or Justice of the Peace, Ngtary P11blic, or other person allthoriie9 te **teke** a statolOl{aeclaration]

9. Checklist

This checklist is to be completed by the applicant

Application		**Comments/justifications**
All sections of the application form completed or you have requested an information waiver under section 59 of the HSNO Act	☒ Yes ☐ No (If No, please discuss with an advisor to enable your application to be further processed)	
Confidential data as part of the confidential form. Please note the EPA strongly encourages applicants to provide as much information as possible in the main body of the application form unless there is a genuine argument that it is commercially sensitive.	☒ Yes ☐ No	
Supplementary optional information attached:		
• Copies of additional references	☒ Yes ☐ No	APVMA Notice of Registration. Included in Confidential Appendix
• Letter(s) of access	☐ Yes ☒ No	
• Relevant correspondence	☐ Yes ☒ No	
• Draft label	☒ Yes ☐ No	Included in Confidential Appendix
• Draft Safety Data Sheet (SDS)	☒ Yes ☐ No	Included in Confidential Appendix
Administration		
Are you an approved EPA customer?	☐ Yes ☒ No If yes are you an: Applicant: ☐ Agent: ☐	
If you are not an approved customer, payment of fee will be by: • Direct credit made to the EPA bank account (preferred method of payment) Date of direct credit: • Cheque for application fee enclosed	☐ Yes ☐ No ☒ Payment to follow ☐ Yes ☒ No ☐ Payment to follow	
Electronic signed copy of application e-	☒ Yes	

mailed to the EPA		
Physical copy of signed statutory declaration sent to the EPA, (rapid assessment only)	☐ Yes	If the physical copy is required, please provide mailing address

Signature of applicant or person authorised to sign on behalf of applicant

☒ I am making this application, or am authorised to sign on behalf of the applicant or applicant organisation.

☒ I have completed this application to the best of my ability and, as far as I am aware, the
I t.

[redacted]

Date

Request for information waiver under section 59 of the HSNO Act

☐ I request for the Authority to waive any legislative information requirements (i.e. concerning the information that has been supplied in my application) that my application does not meet (tick if applicable).

Please list below which section(s) of this form are relevant to the information waiver request: