

**From:** [Reassessments](#)  
**To:** [Reassessments](#)  
**Subject:** FW: APP204199  
**Date:** Tuesday, 9 November 2021 1:32:22 pm  
**Attachments:** [2021 NZEPA APP204199 - 10yr extension diazinon, fenamiphos and methamidophos.pdf](#)

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**From:** [REDACTED] <[info@psgr.org.nz](mailto:info@psgr.org.nz)>  
**Sent:** Monday, 8 November 2021 5:00 pm  
**To:** Information Mailbox <[Information.Mailbox@epa.govt.nz](mailto:Information.Mailbox@epa.govt.nz)>  
**Subject:** APP204199

Please find submission attached

Kind regards| Ngā mihi

[REDACTED]

For the Trustees of  
**Physicians and Scientists for Global Responsibility**

[REDACTED]

# PSGR

## Physicians & Scientists for Global Responsibility

Submission to: New Zealand Environmental Protection Authority (NZEPA)

Contact person: [REDACTED]

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**Re: APP204199 - reassessment of diazinon, fenamiphos and methamidophos**

1. The Physicians and Scientists for Global Responsibility (PSGR) recommends against extension of the current expiry date of the active ingredients in question. The current expiry date for the time-limited approvals for substances containing these active ingredients is 1 July 2028 for diazinon, and 1 July 2023 for fenamiphos and methamidophos.
2. These pesticides pose manifold health risks to vertebrates and non-vertebrates and have endocrine-disrupting and neurotoxic action, and these risks have been known for many years. The NZEPA is well aware of submissions from the Pesticide Action Network Aotearoa New Zealand (PAN ANZ) over many years drawing attention to the human and health risk that is evident in the published scientific literature.<sup>1</sup>
3. The rationale of extension by the applicant due to the fact that there are no alternatives is unsupportable.<sup>2 3</sup> There is an extensive organic and regenerative knowledge network that provides information and support for producers to transition away from industrial chemical use towards both integrated weed management and organic methods.

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<sup>1</sup> E.g. Submission to: Environmental Protection Authority Te Mana Rauhi Taiao Subject: Reassessment of organophosphate and carbamate insecticides From: Pesticide Action Network Aotearoa New Zealand (PAN ANZ) Contact: Dr Meriel Watts Date: January 22nd, 2013

<sup>2</sup> Merfield C.N. 2019. Integrated weed management in arable crop systems Report written for Foundation for Arable Research (FAR) December 2019.

<sup>3</sup> OANZ 2021. Time for Action 2020/21 New Zealand Organic Sector Market Report. Organics Aotearoa New Zealand. <https://www.oanz.org/market-reports>

4. The PSGR recognises that the state has been slow to adopt an integrated policy perspective (such as European Commission Farm to Fork strategy<sup>4</sup>) that draws attention to the impact of sustained chemical pollution released from emitters including agriculture.<sup>5</sup>
5. Similarly, the state has been reluctant to fund public good science for agriculture that considers long term organic and regenerative sustainable systems and the potential of these systems to over the longer term, preserve soil, protect ecosystem services and preserve New Zealand's international profile as a responsible agricultural producer. In addition, valuable scientific-farmer feedback loops were closed when extension services were withdrawn and these not only supported farm development, but also drove scientific innovation.
6. PSGR has discussed that the absence of science directed towards public good agriculture results in an absence of feedback loops to the regulator<sup>6</sup> and drawn attention to the fact that the Parliamentary Commissioner for the Environment has recognised the dearth of environmental science that currently exists in New Zealand.<sup>7</sup>
7. Therefore, when applicants such as the applicant for APP204199 claim that there is no other 'alternative' – the NZEPA has no independent scientific information that can support both the contestation of this, and also provide clarity around the benefit of adopting different practices which confer greater human and environmental health benefits, and that protect export markets where these chemicals may be banned.

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<sup>4</sup> IUCN. EU Parliament stands strong in support of the Farm to Fork Strategy. 20 October 2021.

<https://www.iucn.org/news/europe/202110/eu-parliament-stands-strong-support-farm-fork-strategy>

<sup>5</sup> PSGR Submission 2021 Inquiry on the Natural and Built Environments Bill: Parliamentary Paper

<https://psgr.org.nz/component/jdownloads/send/1-root/72-21nba>

<sup>6</sup> PSGR Submission 2021 Hazardous Substances and New Organisms (Hazardous Substances Assessments) Amendment Bill. <https://psgr.org.nz/pub-res/submissions/nzepa/247-trusted-regulator>

<sup>7</sup> Parliamentary Commissioner for the Environment 2020. A review of the funding and prioritisation of environmental research in New Zealand