

From: [Reassessments](#)
To: [Reassessments](#)
Subject: FW: APP204199
Date: Tuesday, 9 November 2021 1:31:57 pm
Attachments: [2021 Soil and Health 10 yr extension diazinon, fenamiphos, and methamidophos \(APP201045\).pdf](#)

From: [REDACTED]
Sent: Monday, 8 November 2021 5:02 pm
To: Information Mailbox <Information.Mailbox@epa.govt.nz>
Subject: APP204199

Please find attached the Soil and Health Associations submission for this consultation
Thank you

Kind regards | Ngā mihi

[REDACTED]

The Soil & Health Association of New Zealand Inc.



Re: APP204199 - reassessment of diazinon, fenamiphos and methamidophos¹

Deadline: 8 November, 5pm, 2021.

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The Soil and Health Association opposes the application for reassessment² of diazinon, fenamiphos, and methamidophos (APP201045) for the purpose of extending the phase-out dates which were established in 2013.³

The Soil and Health Association supports the EPA's decision to phase-out or ban fenamiphos and methamidophos insecticide in 2023 and diazinon in 2028. Phasing out dates signal to industry that a hazardous substance poses a toxic risk. These chemicals not approved in the European Union.⁴

New Zealand has a growing range of hazardous substances in our soil, water and air which are not authorised for use in the European Union. The European Union is better able to balance human and environmental health risk and take action when a chemical has been recognised to be toxic, and has moved more swiftly to regulate chemicals which pose an environmental and human health risk.

We can see also, that there are pervasive data-gaps, as the chemical industry do not fund the studies to fill in the gaps, and there are no pathways for independent science to undertake this work and supply the information back to the regulator.

If fenamiphos was important for the large European market, and could be demonstrated as being safe, the applicant would have supplied the required data.⁵ Fenamiphos is not approved in the USA, Canada

The insecticide methamidophos is banned in 47 countries, it causes birth defects, increases risk for cancer and is an endocrine disruptor, a neurotoxicant and an acetyl cholinesterase inhibitor.^{6 7} The

¹ <https://www.epa.govt.nz/public-consultations/open-consultations/diazinon-fenamiphos-and-methamidophos>

² Application document. Horticulture New Zealand https://www.epa.govt.nz/assets/FileAPI/hsno-ar/APP204199/APP204199_20210302.0_application-form.pdf

³ APPLICATION 204199 Summary and submission guidance <https://www.epa.govt.nz/assets/Uploads/Documents/Hazardous-Substances/Reassessments-programme/APP201499-details-and-guidance.pdf>

⁴ <https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/active-substances/>

⁵ Peer review of the pesticide risk assessment of the active substance fenamiphos. EFSA Journal doi: 10.2903/j.efsa.2019.5557

⁶ PANAP 2017. Global Governance of Hazardous Pesticides to Protect Children: Beyond 2020 PAN Asia Pacific. <http://files.panap.net/resources/SAICM-PANAP-Children-and-Pesticides.pdf>

⁷ Hertfordshire PPDB: Pesticide Properties DataBase Methamidophos <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/453.htm>

European authorisation for the organophosphate insecticide and acaricide methamidophos was withdrawn in 2008.⁸ It is banned in Brazil and Europe, and listed in the Rotterdam Convention.⁹

Environmental and human exposures to diazinon occur alongside other common chemicals, Regulators haven't looked at the mixture effect, but it is very clear that the cumulative effect of environmental chemicals increases the risk to environmental organisms.¹⁰

The insecticide diazinon is banned in 29 countries, and poses multifactorial risks, particularly to children which include increasing risk for cancer, neurodevelopmental toxicity, and action as an endocrine disruptor.¹¹ Diazinon is not authorised in Europe (Decision 2007/393/EC) because operator, worker, and bystander exposure estimates exceed acceptable limits with or without personal protective equipment, and because chronic and short term dietary exposure estimates in pome fruits exceed safe levels.¹² Diazinon belongs to a group of pesticides with a high harm profile.¹³ Diazinon is a highly toxic insecticide that increases this risk. Diazinon is accumulating in colder groundwater environments in New Zealand.¹⁴

A 'lack of alternatives' is an inadequate argument to support risk assessment and potential further authorisation of these 3 highly toxic pesticides.

⁸ EFSA 2012. Scientific support for preparing an EU position in the 44th Session of the Codex Committee on Pesticide Residues (CCPR). *EFSA Journal* 10(7):2859

⁹ FAO UNEP Operation of the prior informed consent procedure for banned or severely restricted chemicals Decision Guidance Document Methamidophos. Sept. 2015. file:///C:/Users/jodie/Downloads/UNEP-FAO-RC-TRD-GUID-DGD_Methamidophos.English.pdf

¹⁰ Shao et al 2019. Toxicity of 10 organic micropollutants and their mixture: Implications for aquatic risk assessment. *Science of the Total Environment* 666:1273-1282

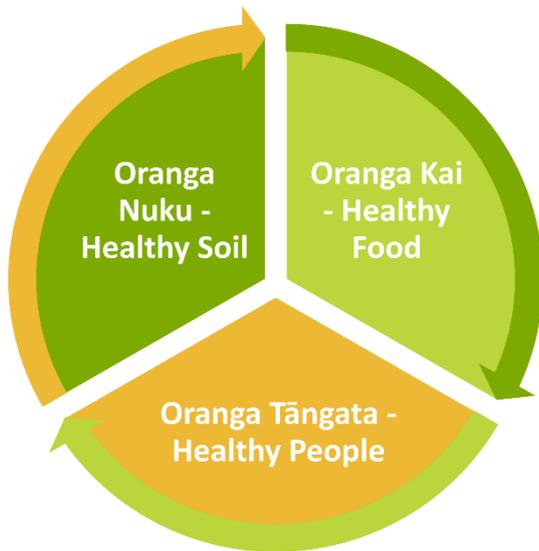
¹¹ PANAP 2017. Global Governance of Hazardous Pesticides to Protect Children: Beyond 2020 PAN Asia Pacific. <http://files.panap.net/resources/SAICM-PANAP-Children-and-Pesticides.pdf>

¹² EC. Commission Decision of 6 June 2007 concerning the non-inclusion of diazinon in Annex I to Council Directive 91/414/EEC and the withdrawal of authorisations for plant protection products containing that substance. Brussels: European Commission; 2007b.

¹³ Fantke, P., Friedrich, R., and Jolliet, O., (2012) Health impact and damage cost assessment of pesticides in Europe. *Environment International* Vol 49, p 9-17. <https://doi.org/10.1016/j.envint.2012.08.001>

¹⁴ Close & Humphries 2019. National Survey of Pesticides and Emerging Organic Contaminants (EOCs) in Groundwater 2018. *ESR*.

The Soil & Health Association of New Zealand is an incorporated society founded in 1941. Its primary purpose is to promote the production and consumption of organic food. Our motto is:



This includes an obligation to:

- ❖ Ensure the perpetuity of the soil's sustainable fertility, which is the foundation for the existence, the prosperity and health of all life on the earth;
- ❖ Promote organic methods of gardening, farming and other natural production and processing methodology, and the conservative sustainable use of all natural resources in order to foster:
 - An awareness of the interdependence of all life on earth;
 - The need to live in harmony with the natural environment