

From: [REDACTED]
To: [submissions](#)
Subject: Diazinon Reassessment submission
Date: Monday, 8 November 2021 4:03:47 pm
Attachments: [image001.png](#)
[Diazinon_submission.docx](#)

Hi,

Please find attached our submission for Diazinon reassessment.

Best Regards

[REDACTED]

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Submission form: For Hazardous Substances and New Organism applications

Submission details

Submission on application number: APP204199

Name of submitter or contact for joint submission: [REDACTED]

Organisation name (if on behalf of an organisation): Nufarm Limited

Postal address: [REDACTED]

Telephone number: [REDACTED]

Email: [REDACTED]@nufarm.com

Confidential details

Once your submission has been received the submission becomes a public document and may be made publicly available to anyone who requests it. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.

I wish to keep my contact details confidential.

The EPA will deal with any personal information you supply in your submission in accordance with the Privacy Act 2020. We will use your contact details for the purposes of processing the application that it relates to (or in exceptional situations for other reasons permitted under the Privacy Act 2020). Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above. We may also use your contact details for the purpose of requesting your participation in customer surveys.

The EPA is likely to post your submission on its website at www.epa.govt.nz. We also may make your submission available in response to a request under the Official Information Act 1982.

Your submission

What is your position on the proposals set out in the reassessment application?

- 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 appended to your submission, see footnote).

Diazinon: New Zealand Grass grub is a common pest of crop production throughout New Zealand. According to the Foundation of Arable Research, a 10% loss of yields from reduced control of grass grub would cost about \$32 m in farm returns. Diazinon has been highly effective in controlling this issue. We are supporting this application as to date there is no suitable alternative available in the market that can address the situation with grass grub as it is currently addressed with diazinon in the market.

As a major supplier of diazinon, we have been actively searching for new compounds to control and manage grass grub in pastures and crops in New Zealand.

One major barrier faced is that grass grub is an NZ native pest, it is really hard to bring a product from overseas and say with confidence that they will be efficacious against grass grub. This makes research projects longer and more time would be needed.

Another barrier is that many of the new compounds that are being looked into as alternatives are not registered in pastures and crops that are fed to livestock so there is a big data gap around animal transfer residue data, due to which there are concerns around elucidating correct grazing withholding periods.

In order to address the above issues, the industry needs more time. Increasing the time period for phasing out will provide an opportunity for companies to do more research and come up with an alternative that is as effective as diazinon.

We have already provided detailed information along with the original application made by The Vegetable Research and Innovation Board.

¹ Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.



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 speak 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 wish to appear at a hearing.

I wish for the EPA to make the following decision:

We support, The Vegetable Research and Innovation Board's application to extend the approvals by further 10 years.

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