

Your submission to APP204199 - reassessment of diazinon, fenamiphos and methamidophos

[REDACTED], Federated Farmers of New Zealand Inc

New Zealand

Ph: [REDACTED]

Reference no: 11

Clause

What is your position on the application?

Position

I support the application

Notes

Clause

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.

Position

Yes I wish to speak about my submission at the hearing

Notes

You have elected to withhold your personal details from publication.

Supporting documents from your Submission

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Federated Farmers of New Zealand

**Submission to Environmental
Protection Authority regarding
APP204199 - Reassessment of
diazinon, fenamiphos and
methamidophos**

8 November 2021



**SUBMISSION TO ENVIRONMENTAL PROTECTION AUTHORITY REGARDING
APP204199 - REASSESSMENT OF DIAZINON, FENAMIPHOS AND METHAMIDOPHOS**

TO: Environmental Protection Agency

DATE: 8 November 2021

ADDRESS FOR SERVICE

Name	Position	Phone Number	Email Address
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

OTHER CONTACTS

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ABOUT FEDERATED FARMERS

Federated Farmers of New Zealand is a membership organisation, which is mandated by its members to advocate on their behalf and ensure representation of their views. Federated Farmers does not collect a compulsory levy under the Commodity Levies Act and is funded from voluntary membership.

Federated Farmers represents rural and farming businesses throughout New Zealand. We have a long and proud history of representing the needs and interests of New Zealand's farmers.

Federated Farmers aims to empower farmers to excel in farming. Our key strategic outcomes include provision for an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of a vibrant rural community; and
- Our members adopt responsible management and sustainable food production practices.

**SUBMISSION TO ENVIRONMENTAL PROTECTION AUTHORITY REGARDING
APP204199 - REASSESSMENT OF DIAZINON, FENAMIPHOS AND METHAMIDOPHOS**

1. INTRODUCTION

- 1.1. Federated Farmers of New Zealand (**Federated Farmers**) welcomes the opportunity to make this submission to the Environmental Protection Authority (**EPA**) regarding APP204199 - reassessment of diazinon, fenamiphos and methamidophos (the **application**).
- 1.2. Federated Farmers represents the interests of farmers and growers in New Zealand, covering the pastoral sector who rely on plentiful and healthy grass crops for livestock diet and seed multiplication. Further, we represent the arable sector who are world-leading producers of grass seeds, for the purposes of multiplication and supplying the pastoral sector and the production of maize grain, for the supply of animal feed. In this respect, our membership is intrinsically linked and interdependent.
- 1.3. Our farmers and growers are world leaders when it comes to the yield and quality of pasture production, whether it be for the purposes of seed multiplication or pastoral production. The ability of all New Zealand farmers and growers to remain world leaders is dependent on gaining control over any pest infestations which may impact on the yield and quality crops produced.
- 1.4. Federated Farmers supports the safe use of agrichemicals and have particular interest in the application as it relates to the reassessment of diazinon and methamidophos.
- 1.5. Diazinon provide farmers with an effective tool for treating and preventing pest infestations in pastoral and grass seed crops, allowing greater quality and yield outputs.
- 1.6. Methamidophos is used in the production of maize grain, though we understand its use to be limited for seasonal incidents of green vegetable bug infestation.
- 1.7. After consultation with our membership, Federated Farmers supports the submission by Vegetable Research and Innovation Board and the other industry grower groups (as listed at page 18 of the application) in terms of extending the phase-out date of diazinon to 1 July 2038 and methamidophos to 1 July 2033.
- 1.8. The position of Federated Farmers, as outlined in this submission, also has the support of NZ Pork on the basis that commercial pig food includes arable crops grown in New Zealand.
- 1.9. We have outlined our reasons in our position below.

2. ARABLE AND PASTURAL INDUSTRY IN NEW ZEALAND

- 2.1. The pastoral sector, encompassing dairy producers, along with meat and wool, is a significant contributor to the New Zealand economy. In 2020, dairy exports alone contributed \$20 billion in revenue, with meat and wool accounting for \$10 billion.¹
- 2.2. The arable industry is also a significant contributor to the New Zealand economy and wider primary sector, particularly the pastoral sector. The arable industry contributed \$863 million to total gross domestic product (GDP) in 2018 and direct sales from arable production were estimated to be \$781 million in the same year². BERL have concluded “the downstream benefits supported by arable seed production...include benefits from the dairy sector, the meat sector, and brewing of beer. Other downstream industries also continue to benefit from the seeds and grains grown by the arable industry in New Zealand”³.
- 2.3. Additionally, New Zealand arable farmers are in-demand producers of off-season multiplication of seed crops by Northern Hemisphere breeders.
- 2.4. Our farmers’ and growers’ ability to continue providing food and fibre at current levels is therefore dependent on maintaining control over pest infestations, such as grass grub in pasture and arable seed and cereal crops, along with current and future pest species in maize crops.

3. DIAZINON AND METHAMIDOPHOS USE IN THE PASTURAL AND ARABLE SECTOR IN NEW ZEALAND

- 3.1. Diazinon is used in both the pastoral and arable sector as an insecticide, primarily for the purpose of controlling grass grubs, along with wider uses in the fields of plant protection and biosecurity.
- 3.2. Grass grubs attack pasture, being the predominant diet of grazing livestock, along with being a major arable crop, as pasture seed producers. In addition to pasture, grass grubs can be damaging to cereals, carrots, herbage seed and white clover seed crops⁴.
- 3.3. As mentioned above at 2.1 – 2.4, these crops have a significant worth to New Zealand export revenue and GDP.
- 3.4. Federated Farmer understands that as of 2014, diazinon is the only current agrichemical option for post planting control of grass grub larvae in arable crops⁵. We have not been able to identify any further studies to refute this, nor are we aware of other viable alternative chemistries.
- 3.5. Methamidophos is predominantly used within the arable sector, by maize growers, who also contribute to the pastoral and livestock sector through the production of maize grain for feed. Although we understand that this agrichemical is not frequently used, it is a valuable tool for maize growers for the control of green vegetable bug.

¹Ministry for Primary Industries *Situation and Outlook for Primary Industries: June 2021*
<https://www.mpi.govt.nz/dmsdocument/45451-Situation-and-Outlook-for-Primary-Industries-SOPI-June-2021>

² Report available from: www.uwg.co.nz

³ Ibid, p. i.

⁴ Foundation for Arable Research (2015) *Chemical control of grass grub* in Arable Extra, Issue 111

⁵ Foundation for Arable Research (2014) *Grass grub biology and non-chemical control* in Arable Extra, Issue 106

- 3.6. Given methamidophos acts as an insecticide against a range of pest insects, it serves as a valuable tool to be retained for any future biosecurity incursions. In terms of emerging pest risks identified in New Zealand⁶, methamidophos may serve to assist growers should the likes of disease-carrying thrips or armyworms were to reach our shores. In this instance, methamidophos would be of potential use in treating these incursions in a range of crops, including vegetable seed crops. By way of specific example, fall armyworm was identified in New Caledonia and Australia in early 2020⁷. Its spread is being monitored by the Ministry for Primary Industries and its arrival in New Zealand predicted to be within the next five years⁸.

4. BENEFITS OF DIAZINON AND METHAMIDOPHOS IN NEW ZEALAND

- 4.1. Federated Farmers supports the retention of diazinon and methamidophos in New Zealand until 1 July 2038 and 1 July 2033, respectively.
- 4.2. It is our view that the retention of diazinon and methamidophos will continue to provide New Zealand farmers and growers with another tool in the toolbox for treating pest infestations in pastoral and arable crops. Without effective controls for these pests, yields and quality can be reduced for individual crops, with a flow on effect into the wider food and fibre supply chain.
- 4.3. Further, as mentioned above, both substances provide farmers and growers with additional options in combatting future biosecurity incursion.

5. AVAILABILITY OF ALTERNATIVES

- 5.1. As mentioned at 3.4 we are not aware of any alternatives to diazinon when it comes to the post planting control of grass grub larvae in arable crops.
- 5.2. Although methamidophos is currently infrequently used by maize growers (i.e. relative to seasonal outbreaks of green vegetable bugs), as we have identified above, it can serve as a useful tool for the control of fall armyworm, identified as emerging pests⁹ and an imminent risk¹⁰ to New Zealand, and to maize growers in particular.

⁶ Market Access Solutionz Limited (2021) *Monitoring biosecurity risks to the New Zealand vegetable and arable industries: Final Report to the Vegetable Research and Innovation Board and Foundation for Arable Research*

⁷ Foundation for Arable Research (2021) *Fall armyworm on the move* <https://www.far.org.nz/articles/1424/fall-armyworm-on-the-move>

⁸ Biosecurity New Zealand (2021) *Biosecurity Intelligence Report: The threat of fall armyworm natural dispersal from Australia to New Zealand* <https://www.mpi.govt.nz/dmsdocument/45934-Biosecurity-Intelligence-report-the-threat-of-Fall-Armyworm-natural-dispersal-from-Australia-to-New-Zealand>

⁹ Market Access Solutionz Limited (2021) *Monitoring biosecurity risks to the New Zealand vegetable and arable industries: Final Report to the Vegetable Research and Innovation Board and Foundation for Arable Research*

¹⁰ Ibid, above n7.

6. CONCLUSION

- 6.1. Federated Farmers welcomes the opportunity to submit on the application.
- 6.2. Grass grub is a major pest in pasture and crops, along with other arable crops. The retention of diazinon for the extended time period will provide farmers with a vital in the toolbox for controlling pests in grass crops and pasture, until a viable alternative is identified.
- 6.3. In threat of impending pest species, such as Fall Armyworm, methamidophos would also provide an additional tool for maize growers to eradicate this devastating pest species, should there be an incursion.
- 6.4. After consultation with our membership, Federated Farmers supports the position of the Vegetable Research and Innovation Board, along with the other industry grower groups, that diazinon is approved for use until 1 July 2038 for the continued use by growers and farmers in New Zealand.
- 6.5. The position of Federated Farmers, as outlined in this submission, also has the support of NZ Pork on the basis that commercial pig food includes arable crops grown in New Zealand.

7. ABOUT FEDERATED FARMERS

- 7.1. Federated Farmers of New Zealand is a primary sector organisation that represents farmers, and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.
- 7.2. The Federation aims to add value to its members' businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - 7.2.1. Our members may operate their businesses in a fair and flexible commercial environment;
 - 7.2.2. Our members' families and their staff have access to services essential to the needs of the rural community; and
 - 7.2.3. Our members adopt responsible management and environmental practices.

ENDS