

Your submission to APP204244 - reassessment of tebuconazole and propiconazole

Submission number: 127813

Reference number: 4

[REDACTED], Federated Farmers of New Zealand Inc
New Zealand

Reference no: 4

Clause

1. What is your position on the proposals set out in the reassessment application? Please outline your reasons in the text box below.

Position

I neither support or oppose the application

Notes

Clause

2. 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

No I do not 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
APP204244 – modified reassessment
of tebuconazole and propiconazole**

16 December 2021



**SUBMISSION TO ENVIRONMENTAL PROTECTION AUTHORITY REGARDING
APP204244 – MODIFIED REASSESSMENT OF TEBUCONAZOLE AND
PROPICONAZOLE**

TO: Environmental Protection Agency

DATE: 16 December 2021

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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
APP204244 – MODIFIED REASSESSMENT OF TEBUCONAZOLE AND
PROPICONAZOLE**

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 APP204244 – modified reassessment of tebuconazole and propiconazole (the **application**).
- 1.2. Federated Farmers represents the interests of the arable sector who are world-leading producers of cereal crops (barley, wheat, oat, rye, corn, triticale), along with grass seeds (including, but not limited to, ryegrass) for the purposes of multiplication and supplying the pastoral sector. Further, we represent the interests of livestock farmers in New Zealand, covering the pastoral sector who rely on plentiful and healthy grass crops for livestock diet. In this respect, our membership is intrinsically linked and interdependent.
- 1.3. Our arable growers include world record holders for their production of cereal crops.¹ Likewise, livestock farmers are world leaders when it comes to the yield and quality of pasture production, for the purposes of supporting healthy livestock and the offshoots of this industry, including dairy, meat, and wool. 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 the controls and classification of tebuconazole and propiconazole (together, the **substances**), along with the mixtures containing them.
- 1.5. Federated Farmers notes the substances are being reassessed by the EPA on the basis that significant information relating to the effects of the substances that was not available in the initial approval of the substances; therefore, meaning that the EPA considers there has been new information available.
- 1.6. Further, we note that the EPA considers the information to be “significant” because it provides information about the toxicological and ecotoxicological effects of the substances.
- 1.7. Federated Farmers therefore notes that the EPA is re-assessing the substances on the basis that section 62(2)(a) of the Hazardous Substances and New Organisms Act 1996 has been satisfied.
- 1.8. Federated Farmers notes the application by the EPA seeks to have the substances reclassified as follows, along with specific proposals for individual product approvals:
 - 1.8.1. Tebuconazole: reassessed as reproductive toxicity Category 2 but no longer classified as specific target organ toxicity (repeated exposure) Category 2.
 - 1.8.2. Propiconazole: reassessed as reproductive toxicity Category 1B; as contact sensitisation Category 1; as hazardous to soil organisms; but no longer classified as specific target organ toxicity (repeated exposure) Category 2 or eye irritation Category 2.

¹ Warren Darling in 2015 for Barley, Chris Dennison in 2015 for Canola and Eric Watson in 2017 for Wheat.

1.9. After consideration of the specific classifications and controls, we consider that there is likely to be little to no impact on the end users of this product. However, we have had the benefit of being provided with Bayer New Zealand Limited's (**Bayer**) submission. We are in support of the position Bayer has outlined in its submission and are neutral as to the changes proposed.

1.10. We also acknowledge any submissions provided by other suppliers of the substances, particularly where they seek an explanation for the changes being proposed by the EPA in relation to their individual products. While we are generally in support of the EPA's reassessment as having the intention of providing accurate and safer conditions around the use of the substances, clear explanation for proposed changes needs to be provided so that the information provided in support of changes can be examined.

1.11. We have outlined information about the use of the substances within the arable and pastoral industries below, along with the benefit their use provides these sectors, but do not wish to be heard in regard to our submission.

2. ARABLE AND PASTURAL INDUSTRY IN NEW ZEALAND

2.1. 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.

2.2. Additionally, New Zealand arable farmers are in-demand producers of off-season multiplication of seed crops by Northern Hemisphere breeders.

2.3. 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 billion⁴.

2.4. Our farmers' and growers' ability to continue providing food and fibre at current levels is therefore dependent on maintaining control over fungal disease, such as rusts, along with providing a tool for farmers and growers in future against possible biosecurity incursions of fungal diseases.

2.5. In addition to food and fibre, growers and farmers are also invested in supporting and promoting biodiverse and native plantings. Many of our members have invested heavily in enhancing biodiversity on farm through their own volition to ensure better outcomes for freshwater, carbon sequestration, on-farm ecology, and amenity values. Robust biosecurity control measures are therefore vital for preserving not only our core farming operations, but also not to expose New Zealand to an emissions liability or loss of habitat through putting these biodiverse plantings at risk. As an example, the role that substances may play, tebuconazole was identified in the group of triazole fungicides and triazole mixtures as being some of the most effective against myrtle

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

³ Ibid, p. i.

⁴Ministry 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>

rust⁵. Tebuconazole was also mentioned as the most economically viable against others tested⁶.

3. TEBUCONAZOLE AND PROPICONAZOLE USE IN THE PASTURAL AND ARABLE SECTOR IN NEW ZEALAND

- 3.1. Both substances are used in arable crop production as fungicides for treating currently present fungal disease, along with having potential for use against future biosecurity incursions of fungal diseases.
- 3.2. Tebuconazole provides farmers with an effective tool for controlling fungal diseases in wheat, barley, oats, ryegrass seed crops, peas, and onions; the latter two being arable crops when grown for the purposes of seed multiplication. Ryegrass seed crops are a key crop for underpinning the pastoral livestock sector.
- 3.3. Propiconazole is used as a systemic fungicide on turfgrasses grown for seed and aesthetic or athletic value, along with on wheat, maize, sorghum, and oat crops; all of which are arable crops. These crops also support the livestock sector, with maize and wheat being important livestock feed products.
- 3.4. Fungal diseases in arable crops, along with pastoral ryegrass, can be devastating to farmers and growers. Left unchecked, some fungal diseases can cause significant reductions in crop yields. By way of example, Foundation for Arable Research (**FAR**) trials have indicated that the substances are key fungicides used for controlling stem rust in ryegrass seed crops, with untreated seed yields in trials showing a 40 to 60% reduction. In untreated wheat trials conducted by FAR, there was a 30 to 50% increase in *Septoria tritici* blotch (STB) severity, a 17 to 20% reduction in yield and \$874 to \$1,022 less in margins over costs, compared with treated wheat.
- 3.5. Fungal disease in crops can also have effects for coming years harvests, with early control of fungal disease necessary to prevent incidence of overwintering fungi, leading to infections in later years.
- 3.6. As mentioned above at 2.1 – 2.4, these crops have a significant worth to New Zealand export revenue and GDP.

4. BENEFITS OF TEBUCONAZOLE AND PROPICONAZOLE IN NEW ZEALAND

- 4.1. It is our view that tebuconazole and propiconazole provide New Zealand farmers and growers with another tool in the toolbox for treating fungal infestations in 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.
- 4.2. The substances are also important tools alone and as a mixing partner in disease control strategies for managing fungicide resistance, where a grower may bring another mode of action into play to decrease over-reliance on one chemistry.
- 4.3. Further, as mentioned above, both substances provide farmers and growers with additional options in combatting future biosecurity incursion.

⁵ Biosecurity New Zealand Report to Ministry for Primary Industries (2018) *MPI 18607 Project Report: Chemical control – review of control methods and fungicides* <https://www.mpi.govt.nz/dmsdocument/37278-chemical-control-review-of-control-methods-and-fungicides-report>

⁶ Ibid.

5. IMPACT OF REASSESSMENT

- 5.1. Federated Farmers represents farmers and growers, who are likely the end-user for the substances.
- 5.2. We note that in terms the impact to end-user is likely to be minimal in terms of how the substances can be used and the safety requirements which may be required because of the reassessment.
- 5.3. However, our members rely on the appropriate information being taken into account by the EPA in assessing and reassessing hazardous substances.
- 5.4. We are therefore in support of the neutral position taken by Bayer and that the EPA provide further information by way of explaining the proposed changes in regard to Bayer product approvals.

6. CONCLUSION

- 6.1. Federated Farmers welcomes the opportunity to submit on the application.
- 6.2. The substances are vital tools for arable farmers and growers for the role they play in the control of fungal diseases in both primary crops and the supportive biodiverse systems.
- 6.3. Federated Farmers supports the neutral position of Bayer as outlined in its submission to the EPA. We do not wish to be heard in regard to our submission.

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