ENVIRONMENTAL RISK MANAGEMENT AUTHORITY
NGĀ KAIWHAKATŪPATO WHAKARARU TAIAO

FORM HS1

Application for approval to

IMPORT OR MANUFACTURE ANY HAZARDOUS SUBSTANCE FOR RELEASE

under section 28 of the Hazardous Substances and New Organisms Act 1996

Name of Substance(s): Permatek™ IM 30

Applicant: Zelam™ Ltd.

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Office use only

Application Code: ☐☐☐☐☐☐☐☐ Date received:____/____/____

ERMA NZ Contact: _____ Initial Fees Paid: $

Application Version No: _____.

IMPORTANT

1. Before you fill in this application form, you may find it helpful to consult the *User Guide to Hazardous Substance Applications under the HSNO Act 1996*. This User Guide can either be downloaded from our website or purchased from ERMA New Zealand. The level of information that you need to provide in this application is dependent upon the scale and the significance of the risks and/or whether these risks are well understood and controlled. The User Guide will offer further advice on this.
2. Part B of the User Guide covers applications under Section 28 of the Act and all of the cross references in this application form are to Part B.
3. You can also talk to an applications officer at ERMA New Zealand who can help you scope and prepare your application. We need all relevant information early on in the application process. Quality information up front will speed up the process.
4. This application form may be used to seek approvals for more than one hazardous substance where the substances are related, for example a concentrated compound (active ingredient) and its related formulations or the two parts of an epoxy glue.
5. Any extra material that does not fit in the application form must be clearly labelled, cross-referenced, and included in an Appendix to the application form.
6. Commercially sensitive information must be collated in a separate Appendix.
7. Applicants must sign the form and enclose the correct application fee. The initial application fee can be found in our published *Schedule of Fees and Charges*. Make sure that you have an up to date copy of the Schedule. Please check with ERMA New Zealand staff. We are unable to process applications that do not contain the correct fee.
8. Unless otherwise indicated, all sections of this form must be completed for the application to be progressed. Where an applicant is unable to complete the sections marked optional, this information may be derived by ERMA New Zealand and the costs of doing so will be recovered from the applicant as part of the processing costs.

You can get more information at any time by contacting us. One of our staff members will be able to help you.

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NEW ZEALAND
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Section One – Applicant Details

See comments under "Section One of Application Form" in the User Guide for guidance.

1.1 Name and postal address in New Zealand of the organisation making the application:

Name: Zelam Ltd.
Address: P O box 7142, NEW PLYMOUTH
Phone: 06 755 9234
Fax: 06 755 1174
Email: chayward@zelam.com

1.2 The applicant's location address in New Zealand (if different from above):

Address: Hudson Road,
NEW PLYMOUTH

1.3 Name of the contact person for the application:

This person should have sufficient knowledge to respond to queries and either have the authority to make decisions on behalf of the applicant that relate to processing the application, or have the ability to go to the appropriate authority.

Name: Chris Hayward
Position: Regulatory Affairs
Address: P O Box 7142
Phone: 06 755 9234
Fax: 06 755 1174
Email: chayward@zelam.com

Section Two – Application Type and Related Approvals Required

This form is only to be used for an application to import and/or manufacture a hazardous substance for 'release' and if it does not meet the requirements for rapid assessment. Please note that it is the substance(s) which is approved, and thus the approval covers both import and manufacture.

If you are making the application for some other reason, you will need a different form.

2.1 Is the information in this application relevant to import, manufacture or both:
(See comments under "Section 2.1 of Form" in the User Guide)

- manufacture Yes

2.2 If the information in the application relates to manufacture in New Zealand, provide information on the proposed manufacturing process and any alternatives.
(See comments under "Section 2.2 of Form" in the User Guide)

This is new technology and as such is confidential
This information can be found in appendix 1

2.3 If you have reasons for not providing detailed information in this application, explain what they are and provide some justification.

An example of a reason for not giving detailed information is where an approval has been given by another jurisdiction and information that led to that approval can be referenced or the substance will be used in low risk situations or ways.
(See comments under "Section 2.3 of Form" in the User Guide)

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We consider this a category A application. The entire manufacturing process is carried out in an enclosed plant. The risk to the operator is considered low and as Zelam Ltd. is a privately owned plant there is unlikely to be exposure to members of the public.

2.4 If this substance(s) needs an approval under any other legislation, has an application for this approval been made?
(Optional) (See comments under "Section 2.4 of Form" in the User Guide)

Name of Approval	Application made
Agricultural Compounds and Veterinary Medicines Act 1997	NA
Food Act 1981	NA
Medicines Act 1981	NA
Chemical Weapons (Prohibition) Act 1996	NA
Radiation Protection Act 1965	NA
Biosecurity Act 1993	NA
Resource Management Act 1991	NA
Other (please specify):	no

Section Three – Information on the Substance(s)

Note all information that is commercially sensitive must be attached as an Appendix. The application form should be cross-referenced to the Appendix but should be able to be read as a stand-alone document which will be publicly available.

You will need to provide a brief description of where the information in the application has been sourced from, eg from; inhouse data, research, technical literature, etc. See the introductory comments under "Section Three of the Form" in the User Guide for more details.

If approval is being sought for more than one hazardous substance, this section must be completed separately for each hazardous substance.

Approval is being sought for Permatek IM30
Information contained in this application and the appendices has been obtained from in-house data bases, technical literature, overseas technical material and GLP toxicological studies undertaken.
This substance is a manufacturing concentrate.
Full identification this substance, including formulation, is in appendix 1.
Below is a summary of the characteristics of the main components of the substance.
Permatek IM30 is ccurrently registered in Australia and USA for the same use.

3.1 State the unequivocal identification of the substance(s).

This section should include all information necessary to unequivocally identify the substance(s) and may include:

- Chemical Name (Chemical Abstracts Preferred Index name or IUPAC name)
- Common Name
- Synonyms
- Trade Names
- CAS Registry Number
- Molecular Formula
- Structural Formula
- Significant impurities

For mixtures, in addition to the above information being provided on the actual mixture, information is also required on the composition of the mixture ie the chemical name, CAS number, function (eg active ingredient, emulsifier, surfactant, filler) and percentages of **ALL** components of the mixture (including non-hazardous components and impurities) should be provided. This information may be best expressed in tabular form. If the composition is variable, please ensure to state the limits.

If there are commercial reasons for not providing full information in the main part of the form, alternative approaches must be discussed with and agreed by ERMA New Zealand. These must include the provision of a unique identifier of some kind.

(See comments under "Section 3.1 of Form" in the User Guide)

Substance: Permatek IM30
internal reference: Tnl 1685
full details in appendix 1

3.2 Provide information on the chemical and physical properties of the substance(s).

Provide as much information as possible on the chemical and physical properties of the substance(s) [at 20°C and 1 atmosphere unless otherwise stated] eg

- Appearance (colour, odour, physical state or form)
- pH
- Density
- Vapour pressure
- Boiling/melting point
- Solubility in water
- Water/octanol partitioning co-efficient

For mixtures, information is required on the chemical and physical properties of the mixture itself. However, if this information is not available, you should provide information on the chemical and physical properties of EACH hazardous component of the mixture

(See comments under "Section 3.2 of Form" in the User Guide)

colour: White creamy liquid
active content: 30g/L imidacloprid
pH: 5.0 – 7.0
SG: 1.006 @ 20^{0}C
Flash point: n/a
Solubility in water Completely soluble

3.3 Provide information on the hazardous properties of the substance(s).

Information should be provided on the hazardous properties of the substance(s) known to the applicant. You must consider each of the six hazardous properties below and provide information on those hazardous properties that trigger any threshold level. If you wish, you may assign the relevant HSNO classification category to each hazardous property that exceeds these threshold levels.

- explosiveness
- flammability
- oxidising properties
- corrosiveness
- toxicity
- ecotoxicity

If your substance is a mixture and you cannot provide direct information on its hazardous properties, you can apply mixture rules to the hazardous components of the mixture. If you do this, then you will need to provide information on the hazardous properties of each hazardous component of the mixture, and show your workings.
(See comments under "Section 3.3 of Form" in the User Guide).

As a requirement for registration in USA a 5 pack toxicity study was undertaken by a GLP certified laboratory, Summaries of these results are in appendix 3, full reports available on request.

explosiveness	n/a
flammability	n/a
oxidising properties	n/a
corrosiveness	n/a
toxicity	ERMA report (SOS1000749) suggests 6.1E, 6.3B, 6.5B, 6.9B Independent tox studies suggest no acute, dermal, eye or sensitising toxicity.
ecotoxicity	ERMA report (SOS1000749) suggests 9.1A, 9.2B, 9.3B, 9.4A

3.4 Identification of the default Controls on the substance(s).

A range of default controls are triggered by the hazardous property classification(s) attached to the substance. If you wish, you can list what these default controls are. If you don't provide this information, ERMA New Zealand will do it for you. Regardless, you need to be aware of what the default controls are so that you can take them into account when assessing risks – see Section 4.
(Optional) (See comments under "Section 3.4 of Form" in the User Guide)

Zelam Ltd understands the controls and has the reference material to identify them. They are not listed here.

3.5 Provide information on what will happen to the substance throughout its whole life from its introduction into New Zealand, its uses, through to disposal.

This information is used in the development of exposure scenarios and the assessment of risks, costs and benefits and should therefore be as expansive as possible.
(See comments under "Section 3.5 of Form" in the User Guide)

Purpose of Use:	**Permatek IM30** is a permanent timber treatment applied to sawn timber for the protection from termites. This treated timber is to be exported to Australia- there is no requirement in New Zealand for termite protection. It is applied using a dip impregnation process details in appendix 4
Manufacture:	**Permatek IM30** will be manufactured at Zelam Ltd's site in New Plymouth. This facility has ISO 9001 accreditation for the manufacturing and handling of chemicals. The Quality control systems in place for the control of dust, spillage and wash-waters are explained in appendix 4 No waste substance is allowed to leave the site but is treated on-site, as per the waste management system -appendix 4 Staff have received the appropriate training for handling of the raw materials and all MSDS, production techniques and safety controls are available at all times. All manufacturing personnel hold advanced GrowSafe distributor qualifications.
Storage:	Storage on-site is within the confines of Zelam Ltd's fully bunded area where no spillage has flow to the city's storm-water system or the environment via the soil. Containers are 200L drums. Or 1000L ISO shuttles.
Transport:	Where possible will be shipped on pallets. Transport is by approved carriers with the correct labelling for the hazard class of this product.
End-use:	In the confines of the sawmill site, will be handled by approved persons who have had the appropriate training as per the *Approved Code of practice for the Safe use of Timber preservatives and Antisapstain Chemicals (June 1993.* Application will by either spray or dip method, both operations are described in full in appendix 4. The appropriate safety equipment/clothing will be used. Storage in site will be in an approved facility suitably bunded and with the appropriate signage.
Disposal:	Any surplus product will be returned to Zelam Ltd for disposal in the appropriate way, either by re-blending or into the waste management soil bins. Empty containers will be triple rinsed and either re-used or crushed and buried in a approved landfill.
Treated Timber:	The treated lumber will be exported to Australia. Export lumber will be wrapped to meet international shipping standards.

Section Four: Risks, Costs and Benefits

These are the positive and adverse effects referred to in the HSNO Act. It is easier to regard risks and costs as being adverse (or negative) and benefits as being positive. In considering risks, cost and benefits, it is important to look at both the likelihood of occurrence (probability) and the potential magnitude of the consequences, and to look at distribution effects (who bears the costs, benefits and risks).

You will need to consider the effects on the environment and human health and welfare, including any social effects.

In each section set out below, it might be easier for you, and most useful for ERMA New Zealand, if the information is set out under the following three sub sections:

- Costs and benefits which can be stated in monetary (dollar) terms
- Non-monetary risks and costs
- Non-monetary benefits.

Complete this section as far as you can. If the analysis provided is incomplete, then it will be completed by ERMA New Zealand. However, the costs of doing this will be chargeable.

You will need to provide a brief description of where the information in the application has been sourced from, eg from; inhouse research, independent research, technical literature, community or other consultation.

(See comments under "Section 4 of Form" in the User Guide)

Identification of Risks, Costs and Benefits

a). Monetary Risks and Benefits

Monetary **risk** may be derived from;

Risk Identified	Significant	Reason
Providing suitable transport delivery facilities	No	Transport controls already in place for moving similar products
Providing containment for use	No	Sites using timber treatment substances will already have controls in place
The consequences of a spillage (with associated environmental damage potential)	Yes	Even with controls in place, accidental spillage or non-compliance could create risk
Adverse health effect on workers or users.	No	Permatek IM30 has been classified non toxic in independent studies.
Inappropriate use of the product	No	This type of product is highly controlled and is not available through uncontrolled sales outlets. Supplier provides training for use and monitors site use.
Unsafe disposal of treated wood	Yes	Treated offcuts or shavings may need to be segregated to avoid inappropriate uses such as burning in barbecues. The low toxicity of the ingredients and the use dilution rate will mitigate the risk.
Disposal of unused substance	No	Zelam Ltd has a policy of removing unused product from sites for safe disposal. Risk would stem from unauthorised disposal
Disposal of packaging	No	Well rinsed packaging is safe for disposal in a registered landfill

Monetary **benefits** may be derived from;

Benefit Identified	Significant	Reason
A more cost-effective product	Yes	Reduces cost of providing treated timber product to a specified standard
Increased export timber sales	Yes	Timber supplied to Australian market needs to be treated to prevent termite attack.
A reduction in the adverse reaction of workers to the chemicals	Yes	Use of lower toxicity chemicals reduces risk of long term health issues
A reduction in the risk to the environment in the event of a spillage	Yes	In cases of control non-compliance, cost of remedial work may be lower than competing products because of lower toxicity of ingredients.

b). Non-monetary Risks and Benefits

Non-monetary **Risks** may be derived from;

Risk Identified	Significant	Reason
Spillage or handling incident at manufacturing stage	No	Zealm Ltd's manufacturing site is a purpose built facility with full bunding to contain spillage and double concentric pipework to reduce potential impact of earthquake. Site procedures are covered by ISO9001
Damage to aquatic organisms	Yes	Permatek IM30 is soluble in water and some components have high aquatic toxicity
Inappropriate use of the product	No	Product sale is restricted and is used under controls
Risk to end users of treated wood	No	The treatment of the timber is via systems designed to protect the operators Any remaining product would be fixed to the wood and in very low concentration.
Public exposure to treated product		As above. No residual gasses are associated with the treatment.
Risk of environmental damage from treated wood or wood products	No	The components of Permatek IM30 are used in the environment as agricultural compounds, and the small amounts that may remain on the surface of the wood are not significant.
Environmental effect of burning of wood with added chemicals	No	The added chemicals will not add to the emissions from burning wood in any significant way. Poly-aromatic hydrocarbons released from burning wood are more significant. No residual chemicals in ash.
Non-compliance with controls	No	This could apply to spillage in transport, container leakage, inappropriate use or labelling. The range of controls applied under the HSNO Act should minimise the risks associated with non-compliance.
Natural hazard (earthquake, flood, volcanic activity), or deliberate sabotage	No	Containment during manufacture, appropriate packaging and low likelihood of bulk storage reduce the risk associated with natural disaster. Deliberate sabotage is unquantifiable, though unlikely, and effect would be short term due to biodegradable nature of Permatek IM30..

Non-monetary **benefits** may be derived from;

Benefit Identified	Significant	Reason
User friendly nature of the product, no smell	Yes	Some current products have unpleasant odour and create discomfort for workers close to the treatment area
No solvents being released to the atmosphere	Yes	No solvents in formulation
Wider choice for timber treaters to chose from	Yes	Product currently registered for use in Australia and approved by the AUS/NZ Standards Association.

4.2 Provide an assessment of those risks, costs, and benefits identified in Section 4.1 which might be significant.

This section excludes risks, costs, and benefits which relate specifically to Mâori taonga or to international agreements. See Sections 4.3 and 4.4 below for those aspects.

Assessments only need to be done for those risks, costs and benefits which Section 4.1 shows might be significant. Section 4.2 in the User Guide provides a detailed explanation of how to do an assessment. Remember that assessments can be qualitative ie based on judgements, if there is no analytical information available. But it is essential that a firm conclusion is drawn about the size and likelihood of the risks, costs or benefits, and also about the certainty of the assessment.

In assessing risks especially, it is important to take account of the extent to which risks will be reduced by the default or other controls (see Section 3.4 above and 4.5 below).
(See comments under "Section 4.2 of Form" in the User Guide)

Of the risks identified in Section 4.1, the following were judged significant and warrant further assessment:

- The consequences of a spillage (with associated environmental damage potential),
- Unsafe disposal of treated wood,
- Damage to aquatic organisms.

Assessment of the risks in the table below follows the example used by ERMA in earlier reports. This procedure assesses the likelihood of an event occurring and the magnitude of the effect resulting from that occurrence. These assessments are then used to calculate the level of risk as insignificant, low, medium, high or extreme.

The Table below shows the result of applying these criteria to the identified risks.

Calculated levels of risk associated with Permatek IM30

Risk identified	Likelihood	Magnitude of effect[1] *Environment*	*Human*	Level of risk[1]
The consequences of a spillage:				
Contamination of waterways	Unlikely	Minor	Minor	Low
Contamination of soil	Unlikely	Minimal	Minimal	Insignificant
Unsafe disposal of treated wood	Unlikely	Minor	Minimal	Low
Damage to aquatic organisms	Very unlikely	Minor	not applicable	Insignificant

[1] 'Level of risk' is calculated using the more serious of the two scores under 'Magnitude of effect'

Risk identified: The consequences of a spillage (with associated environmental damage potential)

Spillage may result from accident in transport or from a handling incident on the end-use site. Controls applied to the transport of goods and controls applied through HSNO regulation should reduce the risk of spillage into the

environment.. The product is designed to minimise the risk to the environment by using small quantities of insecticide in it's formulation, and by judicial choice of the major constituents.

The environmental risk and potential cost associated with a spillage is consequently low, as the toxicological profile of the product is extremely favourable. Only when large quantities of the concentrate are added directly to a waterway would risk be significant, and the effect would rapidly diminish as the product was diluted. For ground spillage away from waterways, risk is almost negligible, as the components posing risk to aquatic organisms will bind with soil and will then be broken down by soil organisms.

The intended use of the product further limits the potential risks, by dilution of the concentrate before use and by use only on a limited number of sites. These sites are industrial and have containment measures in place for storage of chemical concentrate and for areas where the chemical is diluted (with water) for use, stored (as a dilute solution) or applied to the timber surfaces.

Drainage / drippage from the packs after treatment is retained in a bunded area and returned to the dip solution via recovery sump. The dip solution is replenished as it is consumed - so with the re-circulation system the bath can remain in continuous use and solution does not need to be disposed.

Risk identified: Unsafe disposal of treated wood

After treatment, wood is usually dried before sale and use. The major risk of treated wood being inappropriately used stems from offcuts being taken for fuel in homes or on barbeques. However, direct contact with food is unlikely, and the burning of any residual chemical will not produce toxic fumes over and above those produced by the wood itself. Burning is not likely to leave residual chemical in the ash.

The need to ensure that treated product is disposed of appropriately is stressed in the training programme for users of the product.

Treated timber is for export.

Risk identified: Damage to aquatic organisms

Provided that the controls specified for use of the product are applied, the risk to aquatic organisms from Permatek IM30 is no greater than the risk from existing approved products. The ingredients of Permatek IM30 are not new to New Zealand. The applicant already holds registrations for this timber treatment in Australia andUSA.. The active ingredient is registered for use as an agricultural compound.

A more cost-effective product	Yes	Reduces cost of providing treated timber product to a specified standard
Increased export timber sales	Yes	Timber supplied to Australian market needs to be treated to prevent termite attack.
A reduction in the adverse reaction of workers to the chemicals	Yes	Use of lower toxicity chemicals reduces risk of long term health issues
A reduction in the risk to the environment in the event of a spillage	Yes	In cases of control non-compliance, cost of remedial work may be lower than competing products because of lower toxicity of ingredients.

Benefit identified: A more cost-effective environmentally safer product

The high activity of the active – resulting in the very low grams/Litre active content of the formulated product is of benefit both to the user – as lower chemical input and the environment as lower risk of toxicity- and ecotoxicity.

Benefit identified: Reduced adverse reaction of workers to chemicals

Permatek IM30 has been identified as low toxicity and contains no chemicals likely to cause chronic reactions in workers.

Benefit identified: Reduced risk to environment in the event of a spillage

The compounds used in the Permatek IM30 formulation are found in agricultural and horticultural end uses for application to plants, seeds and soil.

Other than the direct spillage of the concentrated product into a waterway, there would be virtually no requirement for emergency clean up measures, as there is negligible environmental risk posed outside an aquatic environment.

4.3 Provide an assessment of any particular risks, costs and benefits which arise from the relationship of Mâori and their culture and traditions with their taonga, or which are, for other reasons, of particular relevance to Mâori.

We have asked for a separate response in this area because these requirements are different to other risks, costs and benefits. These are explained in more detail in Section 4.3 of the User Guide. Please note that if there are potentially significant risks in this area, it will almost certainly be necessary to consult with Mâori in preparing an assessment.
(See comments under "Section 4.3 of Form" in the User Guide)

As far as Zelam Ltd is aware, Permatek IM30 has no risks, costs or benefits that are of particular relevance to Maori, which would arise from the relationship of Maori, their culture and traditions to their taonga.

All the raw materials of Permatek IM30 are currently used in the country as agricultural compounds. Because Permatek IM30 will be used in the confined, controlled areas of sawmill sites it is not expected to have any greater adverse effect on the Maori, their culture traditions or taonga than an agricultural compound.

4.4 Provide an assessment of any risks, costs or benefits to New Zealand's international obligations.

This is a specialist area which ERMA New Zealand will handle. However, any information you are able to provide on relevant international agreements would help us and save time and cost. **(Optional)** (See comments under "Section 4.4 of Form" in the User Guide)

Zelam Ltd is not aware of any international obligations that would be affected by the use of Permatek IM30 as a timber treatment for the control of termites. Permatek IM30 is currently registered for this use in Australia and USA.

4.5 Provide information on the proposed management of the substance.
This section should provide information on managing the effects identified and assessed in Sections 4.1 - 4.4 above. The starting point for this is the range of default controls triggered by the hazardous property classification(s) attached to the substance (see Section 3.4). You should describe how these controls would be implemented and indicate other mean of managing risks.. The information provided must be specific to the substance(s) and cover all areas of intended use. Reference should be made to Codes of Practice or standard operating procedures that will be followed. If changes to the default controls triggered by the substance classification are proposed, the reasons for these changes should be provided.

Please note that you will find it easiest to complete this section in conjunction with section 4.2. That is because the management of risks will influence their residual level.
(See comments under "Section 4.5 of Form" in the User Guide)

The following regulations will be adhered to in the management of the product, Permatek IM30

Hazardous Substances and Noxious Organisms (HSNO) Act 1996. Relevant Controls specified in the Act and identified in this submission will be implemented.

Resource Management Act 1991 (RMA)

The industrial sites where this product will be used are required to seek consent for use under the Resource Management Act 1991, and is administered by Regional Council Authorities. Consent is site specific and product specific. Disposal of containers and treated wastes is also subject to control by local council.

New Zealand Standard NZS5433:1999, Transport of Dangerous Goods on Land.

Transport of the product will be managed under the requirements of this standard. It includes appropriate controls to be applied to packaging, storage and labelling.

Transport of the chemical will be with approved operators who will be issued with appropriate Emergency Safety Guides (ESG) and Material Safety Data Sheets (MSDS).

Health & Safety in Employment (H&SE) Act (1992)

Employee safety and well-being will be maintained by compliance with the general requirements of this Act.

The OSH / Department of Labour publication *"Approved Code of Practice for the Safe Use of Timber Preservatives and Antsapstain Chemicals" (1993)* sets out the required standard for using chemicals in this category.

On Site Training:
In addition to the above regulations and guidelines, Zealm (or they distributor) will provide technical data sheets on the product to inform users of procedures and precautions. On site training in the use of Permatek IM30 will be provided. This training will be offered to all operators and users, and will instruct them in how to safeguard their own health and to ensure that environmental risk is minimised.

Zelam Ltd offers a 24 hours Emergency Response freephone number.

4.6 Provide an overall evaluation of the combined impact of all of the risks, costs and benefits set out in sections 4.2, 4.3 and 4.4.

Doing this overall evaluation is the main task of the Authority. However, you may wish to express a view on the relative importance of the different risks, costs and benefits and how they should be brought together in making a decision.
(Optional) (See comments under "Section 4.6 of Form" in the User Guide)

The major benefits of Permatek IM30 stem from the use of chemical components that are chosen for their manageability. All are biodegradable and the principal bioactive component – imidacloprid is of low human toxicity.

Permatek IM30 has been approved for use in USA and Australia. The active is supported by the manufacturer.

Section Five – International Considerations

5.1 ERMA New Zealand is interested in whether this substance (or any of its components) has been considered by any other regulatory authority in New Zealand or by any other country. If you are aware of this, please provide details of the results of such consideration.
(Optional) (See comments under "Section 5.1 of Form" in the User Guide)

Permatek IM 30 is currently registrated in the following countries for the same use:
APVMA – Australia - registration 54645
EPA – United States – registration 72616-3

Section Six – Miscellaneous

6.1 Provide a glossary of scientific and technical terms used in the application.
(See comments under "Section 6.1 of Form" in the User Guide)

6.2 Provide here any other information you consider relevant to this application not already included.
(See comments under "Section 6.2 of Form" in the User Guide)

Section Seven – Summary of Public Information

The information provided in this section may be used in the Authority's public register of substances required under Section 20 of the HSNO Act.

This summary information will be used to provide information for those people and agencies (eg Ministry for the Environment, Department of Conservation, Regional Councils, etc), who will be notified of the application, and for potential submitters who request information. This information will also be used to prepare the public notice of the application.

For these reasons, applicants should ensure that this summary information does not contain any commercially sensitive material.

7.1 Name of the substance(s) for the public register:

Please use a maximum of 80 characters.
(See comments under "Section 7.1 of Form" in the User Guide)

Permatek IM30

7.2 Purpose of the application for the public register:

This should include (in a maximum of 255 characters) an abstract giving information on the intended use of the substance and why an application is needed based on its hazardous properties.
(See comments under "Section 7.2 of Form" in the User Guide)

To manufacture Permatek IM30 (containing imidacloprid) as a timber treatment for protection against termite attack'

7.3 Use Categories of the substance(s):

ERMA New Zealand has adopted the system of use categories developed by the European Union, which identify various functional uses of substances. This information is pertinent to the assessment of exposure scenarios and the determination of risk and is also useful for building up a profile of the substance. There are three sets of use categories. Within each of these, applicants should state which use categories are relevant to all intended uses of the substance(s).

- Main category: There are four main categories - see User Guide for details.
- Industry category: There are 16 industry categories - see User Guide for details.
- Function/Use category: There are 55 function/use categories - see User Guide for details.

(Optional) (See comments under "Section 7.3 of Form" in the User Guide)

Main category: 3
Industry category: 0
Function/use category: 39

7.4 Executive Summary:

In this section, the applicant should provide a summary of information contained in this application, including:

- the identification of the substance, its hazardous properties and intended uses
- an assessment of the risks, costs and benefits
- the methods implemented to manage the risks, particularly in relation to emergency management and disposal.

(See comments under "Section 7.4 of Form" in the User Guide)

Permatek IM30 is a permanent timber treatment for protection of sawn lumber from termite attack. Permatek IM30 will be used in NZ to treat lumber exported to Australia to meet the requirements of the Australian Building Authorities. Toxicity studies undertaken for EPA registration purposes, show Permatek IM 30 is of low toxicological concern and ERMA prior classification suggests environmental hazards as 9.1A, 9.2B, 9.3B, 9.4A.

An assessment of the Significant risks confirms that they will be minimised by the systems and structures in place at the manufacturing site. The use of UN classified containers and approved cartage contractors will reduce the risk of accidental spillage during transportation. The intended use of the product on limited industrial sites with containment measures in place for storage of chemical and dilution (with water) prior to use. Treated timber is exported, the risk associated with disposal of off cuts of treated wood is minimal as the mills have controls in place to discourage unauthorised removal of timber.

Benefits arise from reducing the cost of providing treated timber product to a specified standard, Increased export timber sales, use of lower toxicity chemicals reducing risk of long term health issues and a reduction in the risk to the environment in the event of a spillage from the use of lower ecotoxicity ingredients.
In the event of the need to dispose of Permatek IM30 the product will be returned to Zelam Ltd, where if necessary it will be disposed of in the in-site waste system. There is no requirement to dispose of diluted product. Treated timber is stored in a bunded contained area where all drippage is returned to the treatment tank.
The management of Permatek IM30 will be controlled by various Governmental Acts and Standards in place including;
Hazardous Substances and Noxious Organisms (HSNO) Act 1996. Relevant Controls specified in the Act and identified in this submission will be implemented. The *Resource Management Act 1991. (RMA) New Zealand Standard NZS5433:1999, Transport of Dangerous Goods on LandHealth & Safety in Employment (H&SE) Act (1992)*
In the event of emergency management being required the relevant information is supplied of the Emergencey Safety Guide and the product MSDS. Zelam Ltd have a 24 hr chemcall number and this is listed on the product label

CHECKLIST

Mandatory sections filled out	Yes
Appendices enclosed	Yes
Fees enclosed	approved creditor, please invoice
Application signed and dated	Yes

Signed Date 30 August 2010