

Call for information on substances containing organophosphates and carbamates (OPCs)

Summary

The Environmental Protection Authority (EPA) is seeking information to inform a potential reassessment of substances containing organophosphates and carbamates (OPCs) used as active ingredients in veterinary medicines or pesticides. This call for information relates mainly to a set of substances that were not included in the EPA's previous organophosphate and carbamate reassessments, which were completed in June 2013 ([APP201045](#) – OPC plant protection insecticides), September 2015 ([APP202097](#) - dichlorvos-containing substances) and January 2016 ([APP202098](#) – carbaryl, chlorpyrifos and diazinon substances used for purposes other than plant protection).

The focus of this call for information is the remaining approved substances containing **bendiocarb, carbaryl, chlorfenvinphos, coumaphos, fenitrothion, fenthion, formetanate, furathiocarb, maldison/malathion, methiocarb, methomyl, propetamphos, propoxur, temephos, tetrachlorvinphos, or thiodicarb** as the active ingredient. A full list of substance approvals we are interested in is in Tables 1-6. In order to understand the current OPC landscape, the EPA is seeking information whether these substances are still in use in New Zealand, and if so, to what extent.

We believe a number of these OPCs are no longer being used. Where the use of an OPC-containing substance is declining, we are seeking information on this reduction of use, and any critical uses or benefits that illustrate the positive effects of those approvals which still remain in use. Additionally, we would like to know if any alternative substances can replace these declining-use OPC approvals.

Please provide your feedback to the EPA by 5pm, 28 May 2021.

Background information

The EPA regulates hazardous substances (chemicals and chemical mixtures) under the Hazardous Substances and New Organisms (HSNO) Act. All hazardous substances imported, manufactured or used in New Zealand require an approval under HSNO. From time to time, the EPA reassesses the approval of a hazardous substance, or group of hazardous substances.

In 2013 the EPA completed a reassessment of a range of plant protection insecticides containing organophosphates or carbamates (OPCs) as the active ingredient. The decision on this reassessment was notified on 27th June 2013.

Following the OPC plant protection insecticide reassessment, two further reassessments of organophosphates and/or carbamates have been conducted. A reassessment of substances containing the organophosphate dichlorvos was completed in September 2015, and a further reassessment was initiated to consider substances containing carbaryl, chlorpyrifos and diazinon that were not included in the previous reassessment. These substances were those used as veterinary

medicines or those that were also used for non-plant protection purposes such as public health (for example, for pest control in hospitals, restaurants etc.) and industrial uses (for example, for building, warehouse or industrial structure pest control). This application was publicly notified in August 2015 and a decision on the application was released on 26 January 2016.

Subsequently, in early 2016, a call for information was sent out to inform the potential next OPC reassessment. The EPA would like to thank all submitters for the information provided. Unfortunately, due to other priorities, the planned reassessment did not proceed at that time. The EPA is now planning to return to the OPC project, but as five years have elapsed since the last call for information, we would like to ask for an update on the use quantities and use patterns for some OPCs. This will help us understand the current OPC landscape.

Next steps

Once we have received feedback on the use of these OPCs, we will assess the need to conduct a further reassessment and consider options for its scope. If the decision is taken to conduct a reassessment we will prepare a formal reassessment application on behalf of the Chief Executive of the EPA. This will then be publicly notified and be open for submissions.

Scope

Approvals thought to be currently unused

The EPA has no information to suggest that substances covered by the approval numbers listed in Tables 1 and 2 are currently being used. We therefore request that anyone who is aware of these approvals being used provides this information to us.

If we are not provided with use information EPA staff may recommend to decision makers, as part of any future reassessment, that these approvals are revoked based on their lack of benefits and the hazards that they pose to human health and the environment.

Table 1: Veterinary medicine substances not known to be in use

Active	Substance description	Approval number
Bendiocarb	Flammable liquid containing 30 - 60 g/litre bendiocarb	HSR002235
Chlorfenvinphos	Liquid containing 900 - 1100 g/litre chlorfenvinphos	HSR001809
	Formula C4	HSR007945
	Formula C5	HSR007946
Coumaphos	Liquid containing 48 - 65 g/litre coumaphos	HSR001804
	Solid containing 2.6 - 3% coumaphos, 1 - 2.5% propoxur and 3 - 7% sulphanilamide	HSR002229
Fenthion	Flammable liquid containing 100 - 202 g/litre fenthion	HSR002237

Active	Substance description	Approval number
Maldison	Solid containing 2.6 - 4.6% maldison	HSR002238
Propetamphos	Liquid containing 12.8 - 18.5% propetamphos	HSR001806
	Liquid containing 0.04 - 0.075% propetamphos	HSR002337
	Flammable liquid containing 30 - 44% propetamphos	HSR002338
Propoxur	Collar containing 7.5 - 9.8% propoxur	HSR001805
	Solid containing 2.6 - 3% coumaphos, 1 - 2.5% propoxur and 3 - 7% sulphanilamide	HSR002229
Temephos	Liquid containing 300 - 400 g/litre temephos	HSR001823
	Solid containing 16 - 30 g/kg temephos	HSR001826
	Flammable liquid containing 10 - 13% temephos	HSR001949

Table 2: Pesticide substances not known to be in use

Active	Substance description	Approval number
Carbaryl	Wettable powder containing 115 g/kg carbaryl, 250 g/kg copper as copper oxychloride and 284 g/kg sulphur	HSR000594
	Suspension concentrate containing 100 g/litre carbaryl	HSR000441
	Suspension concentrate containing 500 g/litre carbaryl (Substance A)	HSR000450
	Wettable powder containing 150 - 200 g/kg carbaryl and 150 - 200 g/kg mancozeb	HSR007696
Maldison	Maldi-Shield 50EW	HSR100732
	Emulsifiable concentrate containing 500 g/litre maldison	HSR000190
Methiocarb	Wettable powder containing 750 g/kg methiocarb	HSR000727
	Suspension concentrate containing 500 g/litre methiocarb	HSR000728
	Mesurool Pro (Decoy Wetex)	HSR007966
	Mesurool 200 SC	HSR100895
Methomyl	ArmourCrop Insecticide	HSR007761
Propoxur	Emulsifiable concentrate containing 200 g/litre propoxur	HSR000195
	Ready-to-use liquid containing 7.9 g/litre propoxur	HSR000199

Active	Substance description	Approval number
	Flammable aerosol containing 0.4 g/kg cyfluthrin, 10 g/kg propoxur and 0.4 g/kg transluthrin	HSR000283
	Dustable powder containing 10 g/kg propoxur and 5 g/kg triflumuron	HSR000725
Thiodicarb	Ready to use bait containing 40 g/kg thiodicarb and 6.5 g/kg thiram	HSR000138
	Bait containing 40 g/kg thiodicarb	HSR000139
	Wettable powder containing 750 g/kg thiodicarb	HSR000717
	Grass Slurry Green	HSR007990
	Grass Slurry Gold	HSR007996
	Thicarb 500FS	HSR101066

Approvals which are believed to be in use, but with limited use and/or declining use patterns

Our preliminary research indicates that the substances table 3 and 4 have declined significantly in use such that the industry is moving away from use on its own accord. For any of these approvals that remain in use in New Zealand we would like information on these uses to justify whether they are critical or can be replaced by other substances also available in New Zealand.

Table 3: Veterinary medicines understood to be in low or declining use

Active	Substance description	Known trade names	Approval number
Coumaphos	Flammable liquid containing 13 - 16.5% coumaphos	Asuntol liquid	HSR001923
Formetanate		Dicarzol 500	HSR007950
Furathiocarb	Flowable concentrate containing 400 g/litre furathiocarb		HSR000411
	400g/litre furathiocarb in the form of an emulsion in water	Furakote 400	HSR000943
Maldison	Fyfanon 440EW (40 g/l maldison)(liquid emulsion)	Fyfanon 440EW	HSR100380

Table 4: Pesticides understood to be in low or declining use

Active	Substance description	Known trade names	Approval number
Carbaryl		Grochem Carbaryl	HSR000681
Maldison	Technical concentrate containing 950 g/litre maldison	Malathion 95 insecticidd	HSR000189

Active	Substance description	Known trade names	Approval number
Thiodicarb	375 g/litre thiodicarb in the form of a suspension concentrate	Larvin SC	HSR000963

Approvals which are believed to be in use

Tables 5 and 6 list the substances which appear to be currently in use, as far as the EPA is aware. Please advise us of the current level of use of the substances below.

Table 5: Veterinary medicines understood to be in use

Active	Substance description	Known trade names	Approval number
Carbaryl	Liquid containing 1.4 - 2.6% 2-hydroxybenzoic acid, 0.7 - 1.3% carbaryl and 0.11 - 0.29% chlorocresol	Fido's Ear Drops	HSR001825
Maldison	Malathion-treated wheat	Crick Out, Crickoff Pro, Cricket Bait	HSR100407
Propetamphos	Liquid containing 35 - 45% p-dichlorobenzene and 1.2 - 2% propetamphos	Maggo	HSR001796
	Liquid containing 36 - 44% propetamphos	Seraphos 1250	HSR001803
	Liquid containing 100 - 120 g/litre propetamphos	Destruct	HSR001948
Temephos	Liquid containing 200 - 210 g/litre temephos	Tempor Cattle, Vengeance	HSR002239
Tetrachlorvinphos	Liquid containing 0.5 - 0.9% alpha-cypermethrin, 6 - 9% piperonyl butoxide and 1.4 - 2.6% tetrachlorvinphos	Pouracide NF, Synergy Cattle	HSR001776

Table 6: Pesticides understood to be in use

Active	Substance description	Known trade names	Approval number
Bendiocarb	Wettable powder containing 800 g/kg bendiocarb	Bendi 800, Ficam W, Flyax	HSR000451
Carbaryl	Suspension concentrate containing 500 g/litre carbaryl (Substance C)	Sevin Flo	HSR000680
Fenitrothion	Ready to use liquid containing 7.8 g/litre fenitrothion	Borer Fluid FN	HSR000202
Methiocarb	Bait containing 20 g/kg methiocarb	Baysol Snail and Slug Bait	HSR000145

Active	Substance description	Known trade names	Approval number
Methomyl	Bait containing 10 g/kg methomyl	Stimukil	HSR000675
	Soluble concentrate containing 200 g/litre methomyl	Orion methomyl 200SL	HSR000584

Information requested

For all substances listed above the EPA requests information on whether the substance is currently in use in New Zealand, including information on manufacture or import quantities and sales quantities. If you no longer use (or import or manufacture) a substance (but have in the past), can you provide information on why you stopped using the substance.

If the substance is used in New Zealand, the following further information is requested:

Information requested for veterinary medicine products

- Target pest and type of animal treated, including any off label uses (that is, uses not specified on the label). Specific use and application information (for example rates, frequencies, methods) are not required at this time.
- Who uses the substance (for example, veterinarian, farmer, domestic user)
- Whether retaining this use is critical or whether there are alternative substances or treatments which can supplant this use including comparative information where appropriate
- Possible effects of the substance becoming unavailable
- Any other general information about the use of the product to illustrate the ongoing benefit

Information requested for other insecticide products and domestic use products

- Target pest and crop treated, including any off label uses (that is, uses not specified on the label). Specific use and application information (for example rates, frequencies, methods) are not required at this time.
- Who is the user (for example, home gardener or pest control professional)
- Whether retaining this use is critical or has significant benefits that justify retaining an approval or a specific use pattern
- Whether there are alternative substances or treatments which can supplant this use including comparative information where appropriate (efficacy, application rates, adverse effects)
- Possible effects of the substance becoming unavailable
- Any other general information about the use of the product to illustrate the ongoing benefit

Important information when providing feedback

How we will use this information

The information you provide in this call for information will be used to assess the need to conduct a further reassessment and consider options for its scope. Should a formal reassessment application be made, interested parties will have an opportunity to make formal submissions on the application once it has been formally lodged.

Feedback may be made publicly available

As a regulator, we wish to run an open and transparent process to the extent possible so the EPA may publish or otherwise make available all or part of your feedback. However, we acknowledge that some information may be commercially sensitive or be otherwise regarded as confidential. Therefore, if you consider any of the information you are providing should not be made publicly available, please clearly indicate this, and give the reasons, so we can consider this before publishing any information.

Privacy

The Privacy Act 2020 establishes certain principles with respect to the collection, use, and disclosure of information about individuals by various agencies, including the EPA.

Any personal information you supply when providing feedback will be used only in relation to the matters covered by this document. We may also use your contact details for the purpose of requesting your participation in customer surveys.

You have a right to access and correct any personal information held by us, by contacting the EPA.

You may request that your personal information (such as your name) be withheld from publicly available information. We will not make your personal contact details publicly available.