

To: Environmental Protection Authority
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Submission on: EPA – Risk Assessment Methodology Consultation

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Submitter:

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Submission on: EPA – Risk Assessment Methodology

1. Introduction

Agcarm welcomes the opportunity to comment on the information outlined within the Risk Assessment Methodology discussion document.

2. Summary of the submission

2.1 Agcarm's perspective is that this is good initiative to share EPA methodology and our members' support a structured approach to risk assessment.

2.2 Individual Agcarm member companies possess the technical expertise with risk assessment, and they will be making more detailed submissions.

3. Discussion

3.1 This is a long awaited initiative to share EPA methodology and there is general support for a structured approach to risk assessment.

3.2 Agcarm members expect that this will be a living document, which will be reviewed in consultation with industry when required, or every two- four years.

3.3 Once the document is finalised it would be useful for the EPA to follow-up with workshops to demonstrate practical elements of the methodology.

4. Feedback on Specific Questions

For the "Assessing the Risks of Hazardous Substances" summary document:

- *Is the level of detail appropriate? Yes*
- *Are there any areas that you would like more information on? Some worked examples would be useful.*

For the "Risk Assessment Methodology for Hazardous Substances" guidance document's main text:

- *Is the level of detail appropriate? Yes*
- *Are the technical aspects correct? We have no comment to make on the technical information as individual Agcarm member companies possess the technical expertise about risk assessments and they will make more detailed submissions. However, a point of clarification regarding the distinction between human medicines and veterinary medicines is absent in Section 2.3*
- *Are there any areas that need more guidance? A short section on what is expected in the costs part of the Risks, Costs and Benefits assessment.*

5. About Agcarm

Agcarm is the industry association for manufacturers and suppliers of crop protection and animal health products. For further information and a full list of members, see www.agcarm.co.nz.

Agcarm member products protect public health, improve animal welfare and help environmental management. They:

Play a pivotal role in growing high yield, sustainable food and fibre products;

Help supply healthy, nutritional and affordable food;

Keep New Zealand's agriculture, horticulture and forestry sectors internationally competitive.

Our members are committed to safety, innovation and product stewardship.