



Proposed risk assessment methodology for hazardous substances

Please submit your comments to submissions@epa.govt.nz on this form in Word document format or use the on-line submission form at www.epa.govt.nz

Feedback on	Proposed risk assessment methodology for hazardous substances
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Proposals and submission form

The EPA is seeking your views as interested parties on the proposals presented in the *Assessing the Risks of Hazardous Substances* and *Risk Assessment Methodology for Hazardous Substances* documents. The EPA is consulting you to be transparent in how we do things as a proactive regulator, and as part of our Customer Centricity themes *Keep me informed*, *Engage with me* and *Be helpful & treat me fairly*.

Please use this form to provide your written feedback and send it to submissions@epa.govt.nz in Word document format no later than 5pm on Friday 6 July 2018. Alternatively, you can use the online submission form on the EPA website at www.epa.govt.nz

The consultation document poses a series of questions that we would like your feedback on. Your response to the questions in the table below are welcomed. You may focus on the questions that are relevant to you, as you are not required to answer all of them.

When providing your comments, please provide your rationale and any additional information you consider is relevant. This information will help us more fully understand the effects the proposed methodology will be likely to have if introduced as currently proposed.

Your feedback is important as it will enable the EPA to make more informed decisions on the final content of the proposed methodology. Please take this opportunity to have your say.

Feedback may be made publicly available

The Environmental Protection Authority (EPA) may publish all or part of your feedback on its website at www.epa.govt.nz. Providing feedback implies that you consent to such publication, unless you clearly specify otherwise in your feedback.

Privacy

The Privacy Act 1993 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 in the course of making a submission will be used only in conjunction with the matters covered by this document. We may also use your contact details for the purpose of requesting your participation in customer surveys. You may request that your personal information (other than your name) be withheld from publicly available information.

Disclaimer

This document does not alter the laws of New Zealand. The EPA does not accept any responsibility or liability to any person, whether in contract, equity or tort, or any other legal principle, for any direct or indirect losses or damage arising from reliance on the contents of this document.

For the “Assessing the Risks of Hazardous Substances” summary document:

Question number	Question	Page number	Your comments/notes and rationale
1	Is the level of detail appropriate?		
2	Are there any areas that you would like more information on?		

For the main text of the “Risk Assessment Methodology for Hazardous Substances” document:

Question number	Question	Page number	Your comments/notes and rationale
3	Is the level of detail appropriate?		
4	Are the technical aspects correct?	27	ADE vs ADI; exposure vs intake. Generally acceptable daily intake is known as ADI not ADE. ADE is acceptable daily exposure. In the context of this section “acceptable daily exposure (ADE)’ should be used.
5	Are there any areas that need more guidance?	8, 3 rd para	“... All of the relevant regulatory reviews must be provided, along with the original studies...” Which particular regulatory agencies are considered relevant to NZ? Those that are considered most relevant and most reliable for their standard of scientific assessment and reporting should be clearly listed in the document. Further, we believe this should be optional and left to the applicant to decide whether to include any overseas reviews or not.
		24	“... Threatened and at risk species...”

Question number	Question	Page number	Your comments/notes and rationale
			EPA needs to clearly define what species are considered threatened or at risk and clearly define the locations where such protection measures are considered necessary. Otherwise, the approach treats all of New Zealand as a sensitive area. Clear guidelines are required on what the additional safety factors are.
6	Are there any other matters that should be addressed as part of this methodology?		

For the technical appendices of the “Risk Assessment Methodology for Hazardous Substances” document:

Question number	Question	Page number	Your comments/notes and rationale
7	Are there alternative groundwater models that the EPA could consider as part of a revised groundwater risk assessment framework?		
8	Is the level of detail appropriate?		
9	Are the technical aspects correct?		
10	Are the requirements practical and achievable?		
11	When used in conjunction with the external guidelines		

Question number	Question	Page number	Your comments/notes and rationale
	for each model, is any further clarification required to be able to perform a risk assessment?		
12	Are the parameter values used by the EPA relevant and correct?	71	Water rates for agricultural spraying varies from 20L up to 100L/ha with the average being 50 to 60 litres.:
		72	Side slope angle: some crops are grown on slopes and not flat terrain, eg vegetables grown in Pukekohe in the North Island and some vineyards are on a slope as well as forage brassicas. Consideration needs to be allowed for these in parameters for AgDISP modelling.
13	Are the models used by the EPA relevant and correct?	60	GENEEC2. This model no longer exists on the USEPA website. Information about GENEEC2 has been archived and the model is not currently supported. It has mostly been replaced with the Pesticide in Water Calculator (PWC), which is referenced in section C.5.8 (p77). We agree that the Pesticide in Water Calculator is more complicated than GENEEC2 and not the preferred option for a screening level assessment. EPA would need to ensure applicants and other interested parties can access GENEEC2 if it is going to be used.
		63	AgDRIFT and APVMA. APVMA are moving away from using AgDRIFT for ground based application in favour of AgDISP. They are developing revised ground application components (parameters in the model) for AgDISP. If AgDRIFT remains as the preferred model in NZ, which version does EPA propose to use? The current available version is 2.0.09.
		69	There is currently work underway to refine the AgDISP model for ground application. APVMA are in the process of developing principles to use AgDISP for ground application modelling.
		74	On page 60 the model for run-off is GENEEC2. In this section, EPA refer to RexTox. What is the intended approach? Is the intention to go from GENEEC2 to RexTox for higher tier modelling? If so, can EPA provide guidelines for appropriate triggers for going from GENEEC2 to RexTox? Or is this to be on the basis of when further refinement of exposure is required.

Question number	Question	Page number	Your comments/notes and rationale
		83	Section C.8.2 – spray drift modelling using BBA. This seems to an inconsistent approach. In other sections, EPA have referenced AgDRIFT and AgDISP modelling for spray drift. It would be preferable to have one consistent model for assessing spray drift or clear guidelines / thresholds as to when the different models should be used.
		96	<p>Section C.12 – Regarding use of the SCI-GROW model, there are a number of other models that can be used for groundwater assessment but most are complex, data hungry and tailored to their specific locations e.g. the EU Focus GW models. Syngenta’s experience is that the SCI-GROW model has proven over the years to be a useful screening level tool to give reasonable estimates for risk assessment. However, if it becomes necessary to refine this number for higher tier assessment of groundwater exposure EPA should provide some guidance on acceptable methodology.</p> <p>As with some other models, SCI-GROW is no longer supported by the USEPA and has been archived. EPA will need to ensure that if the model is used that applicants and other interested parties will have access to the model.</p>
14	Are there any alternate models (other than that for the effects on groundwater) that the EPA could consider?		