SUBMISSION

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Submission on: **Amendments to Hazardous Substances (Importers and Manufacturers) Notice 2015**

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Introduction

The Animal and Plant Health Association of New Zealand (Animal and Plant Health NZ) welcomes the opportunity to provide feedback (and possible solutions) on the proposed changes to the EPA's reporting requirements.

Our comments focus on the proposed changes to the reporting requirements for importers and manufacturers of pesticides, vertebrate toxic agents, timber-treatment and antisapstain chemicals, and parasiticides used as veterinary medicines identified by the EPA *as those chemicals with a high potential and wide dispersal use to enter and have an impact on the environment, particularly soil, freshwater, groundwater, and the coastal marine area.*

As of August 2023, there were 690 importers and manufacturers listed with the EPA. Importing/manufacturing approximately 400 pesticide active ingredients, 20 VTA active ingredients, 10 fumigant active ingredients, 30 timber-treatment and antisapstain active ingredients, and 200 parasiticides.

The proposed changes, as related to the manufacturers and importers described in point 1.2, require such businesses to report the:

- quantities they have imported and manufactured each year;
- Notify their NZBN;
- Notify the HSNO approval numbers; and
- Notify title of the group standards for the hazardous substances they are manufacturing or importing.

Animal and Plant Health NZ's key concerns

We do not support the proposal because:

- we have concerns that the sales volume will be shown alongside the active ingredient with inadequate protection of confidentiality, which could expose the formulation details and intellectual property, divulging market share and market type for competitors, which could be in breach of the Commerce Act;
- there will be significant costs to industry and the EPA in collecting this information;
- there will be complications in determining what will be used in NZ versus what will be exported, given large quantities of product may be imported or manufactured for sale outside of NZ;
- it is unclear how this data is to be used; and
- during an economic downturn, the proposal is ill-timed and would result in further cost burdens for the primary industries.

1. Key Recommendations

1.1 That the Environmental Protection Authority (EPA) review and utilise data already available through other government agencies, before taking on more work and imposing higher costs on industry.

1.2 Duplication of efforts across government departments need to be avoided in the current climate.

1.3 Greater reassurances and systems are needed to ensure confidentiality of commercial information.

1.4 EPA needs to prioritise resourcing on reducing backlogs of applications for newer, softer and more environmentally-friendly chemistries.

1.5 Improving definitions on what is included, e.g. food producing animals, and the exclusion of exported products.

2. Problem definition

2.1 The EPA considers that there is no comprehensive collection of data on the volume of chemicals imported into, or manufactured in, New Zealand that effectively represents the volume of chemicals applied to the NZ environment..

2.2 Reports[1] investigating the environmental fate of chemicals have been produced by the Parliamentary Commissioner for the Environment (PCE), and an EPA technical working group.

3. Legal framework – alignment with other acts

3.1 There are several regulators for hazardous substances that collect data. Further regulation by the EPA under the HSNO Act will duplicate what is already required under the HSWA and ACVM acts. There have been no efforts to align or rationalise the duplication and complexity, share information held across several government agencies.

3.2 The PCE described the system for approving and managing chemicals in New Zealand as complex. A 2019 technical working group (TWG) report prepared for the Ministry for the Environment and the EPA on the hazardous substances compliance system *described the system as fractured, with responsibilities dispersed among 85 different entities*. The PCE required all agencies dealing with the regulation of chemicals to develop a common framework based on the scale, potential harm, and environmental presence of chemicals to prioritise their efforts to consider and manage the environmental impacts of chemical use.

a. There needs to be more co-ordination across government agencies that collect information about hazardous substances covered by this proposal.

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5 [1] PCE. (2022). Knowing What's Out There: Regulating the environmental fate of chemicals (p. 11). Wellington, New Zealand: Parliamentary Commissioner for the Environment (PCE). URL: https://pce.parliament.nz/media/g0pk2axl/regulating-the-environmental-fate-of-chemicals.pdf (accessed 6 November 2023).

6 Hazardous Substances Compliance System TWG. (2019). Hazardous Substances Compliance System Findings Report. URL: www.epa.govt.nz/assets/Uploads/Documents/EPAPublications/Hazardous_Substances_Compliance_System_Findings_Report_2019.pdf (accessed 6 November 2023).

The Imports and Exports (Restrictions) Act 1988 is administered by MBIE and allows Customs access to the EPA register (section 3BF) of importing and manufacturing applicants. The HSNO Act allows for the EPA to access the New Zealand tariff system, (under section 97AA of the HSNO Act). In line with the Biosecurity Act 1993, Biosecurity NZ accesses volume data through the use of smart tools to identify quantities of chemicals in imported goods.

Other reporting requirements for hazardous substances

3.3 Under the EPA Importers and Manufacturers form applicants must supply the EPA with information related to Business, Trading name, NZBN, physical business address, together with the approval code of the hazardous substance to be imported or manufactured. Records need to be kept for a hazardous substance assigned to a group standard.

3.4 HSWA already prescribes methods for tracking the quantities of certain hazardous substances. WorkSafe NZ, under section 212 (g) (ii) of the Health and Safety at Work Act 2015 (HSWA), may prescribe (by order in council) the quantity of the substances to be recorded. Explosives and fumigation volumes for biosecurity are required to be reported.

3.5 All agrichemicals and veterinary medicines require registration under the Agricultural Compounds and Veterinary Medicines Act 1997 (ACVM Act), except for certain domestic and industrial use pesticides. The data collected from registration and approval (active ingredient, concentration of active ingredient and approved use, including hazardous substances approval number etc.) is available on the ACVM database.

4. Compliance

a. The consultation document (paragraph 38) states that the EPA is concerned about the level of compliance with the Importers and Manufacturers Notice. However, there is no reference to specific compliance issues in the EPA annual report. The report shows that 17 Importers and Manufacturer's notices were processed (FY 2022/23), 42 (FY 21/22), and one intended prosecution for an administrative regulatory issue for a hazardous substance (unrelated to the agricultural chemicals and veterinary medicines).

b. The EPA proposes to implement compliance requirements, under clause 5 of the Importers and Manufacturers Notice, although the submission and outcome of a compliance framework consulted on publicly (closed in August 2023) has not been published. The compliance framework did not address the reporting of volume.

5. Confidentiality

a. Under the ACVM Act data, information is protected by the Intellectual Properties Act and is not published to a level that would identify specific active ingredients of a product. The EPA has, on occasion, inadvertently released formulation data (release of multiple science data sheets in 2021) that has provided competitors and the general public with formulations. We would want assurance that appropriate levels of aggregation are in place.

b. We request that more safeguards are put in place to protect confidential information. There is insufficient information provided in the submission document to provide our members with confidence in the process.

6. Exposure of market share, intellectual property

6.1 Under section 36 of the Commerce Act 1986 (amended and in force from 5 April 2023) to promote competition in markets for the long-term benefit of consumers, the Act prohibits firms with substantial market power from misusing market power to harm competition. Actions such as publishing sales data of all participants (including those with small market share) alongside the active ingredient would divulge the market share, the intellectual property, and the type of market a competitor is engaged in.

6.2 In addition, the use of disaggregated sales data would allow niche products to be identified. The reporting of sales data for niche products would disadvantage those who have put the research and development into the product**.** This could lead to manufacturers and importers reconsidering supply to these markets.

7. Proposed Option

7.1 Proposed option 3 Draft Regulatory Impact Statement would require the reporting of volume of imports or manufacture of active ingredients (already approved by the EPA) extracted from sales data and identified by EPA *as those chemicals with a high potential to enter and have an impact on the environment, particularly soil, freshwater, groundwater, and the coastal marine are*a; and those chemicals listed in Appendix 4 of the submission document (extracted from the PCE report). More specific definitions of each grouping are needed, such as large production animals. Some hazardous substances translate across animal and plant use, such as formalin which is used as a food preservative and a veterinary medicine.

7.2 The addition of further chemicals, under Appendix 4 (excluding those under the Rotterdam or Stockholm conventions), are chemicals of interest for reassessment by the US EPA and therefore are not NZ specific.

Costs and Benefits

7.3 The costs to affected parties is estimated as a total impact of $0.7m/year/firm in the first year and something less for preceding years, noting a total of over 600 businesses would be impacted. This figure would seem light on reality when labour and IT is involved. This does not include changes to IT systems so that approval numbers are recorded. This would incur one-off costs for firms with the actual cost dependent on the firms' existing systems.

7.4 The EPA will incur costs related to collecting, storing, analysing, and reporting the data, and follow up regarding compliance. Costs are estimated as:

A. IT investment is estimated at one-off costs of $0.5-1.0m and ongoing costs of $0.2m/year.
B. An additional 1.5 FTE costs plus overheads – cost $0.4m/year to the EPA. With paper or email returns, this would require more staff to undertake data input and collation.
C. There will be one-off costs associated with advising importers and manufacturers about the new requirements and potentially helping people with their first returns – $0.2m.
D. Ongoing communication costs will be part of the process for collecting data (for example, reminder messages) No cost estimated.
E. Total estimate .9M- $1.8M with .4-.6 M/ annum on-going cost. As IT systems are generally over run then the estimate is very light on what could evolve to be more than $2M.

7.6 We are concerned that the EPA is already unable to process applications to the statutory requirements specified (as per Sapere Report). Adding this financial burden means that resources will be further depleted and reprioritised, further compromising the EPA's application processing ability.

7.7 The proposed reporting would be for active ingredients in formulated products (rather than total quantity of the product) for each calendar year and by kg or part thereof. As a comparison

(and to preserve confidentiality of the active ingredient make up), the Australian Pesticides and Veterinary Medicines (APVMA) requires data on the quantity of the formulated product (not the active ingredient) and then uses the product registration information to calculate the active ingredient and report publicly on the active ingredient quantities. It is noted that APVMA Act allows for the collection of sales data as a levy is paid by importers and manufacturers based on sales of an approved product. This is not a legislative requirement in the HSNO Act.

7.7.1 The proposal is for reporting to the EPA would be by chemical class, for example, fungicides, herbicides, insecticides, plant growth regulators, and total pesticides; VTAs; fumigants; timber-treatment and antisapstain chemicals; anti-fouling paints; and parasiticides used as veterinary medicines. This is in line with how other APVMA report volume information[2]. However, New Zealand is a small market and individual active ingredients, niche market product would be easily identifiable.

7.7.2 The minimum reporting on quantities of chemicals (5 or less manufacturers or importers) where there are a small number of importers or manufacturers of the chemical in New Zealand as it is, would see this minimum reporting framework exceeded. For example, there are only two timber treatment manufacturers/importers in NZ.

8. Funding

The EPA does not have new funding to receive, process, and make data publicly available. The choices of options will be affected by funding evaluability through cost savings, reprioritisation, or new Crown funding. As per the 2023 financial statements the EPA is fiscally unable to carry out the current work programme it is responsible for, therefore how will it accommodate a new programme of work that is estimated ($1.4 M in first year of operation, and. 6M for remaining years (not including inflation and the reduction in value).

9. Use of Data

Under paragraph 93, the data set monitoring and compliance requirement is not identified, and the EPA does not have definite plans on how it will use the data.

9.1 Data benefits (if the data was publicly available) would contribute to local government's understanding of the use of chemicals and their potential impact on the environment and people. However, the data provided would be open to interpretation as there are many exceptions (for example those products available to urban gardeners or companion animals would be excluded).

9.2 Data could be used by private sector research and data specialists to contribute to analysis of the economy. Data-driven firms that provide analysis services are internationally a major growth sector and are already present in New Zealand producing the data requested.

9.3 Data can input into wider research on impacts on water, soils, invertebrates, and other environmental factors by government agencies such as NIWA, Plant & Food Research, Manaaki Whenua – Landcare, and PCE. However, the EPA chemical mapping programme would identify those substances that threaten NZ environment, groundwater, soils etc.

10. Sources of data

[2] Department of Health. (2021). Department of Health Annual Report 2020–21. Canberra, Australia: Australian Government Department of Health. URL: www.health.gov.au/resources/publications.

10.1 Except for parasiticides used as veterinary medicines, all chemicals (pesticides, vertebrate toxic agents, timber-treatment and antisapstain) may only be imported or manufactured if there is an individual HSNO approval.

The EPA provides such approval (Section of HSNO Act) and is cognisant of the active ingredient of a hazardous substance imported or imported for manufacture in New Zealand.

In addition:

10.1.1 WorkSafe NZ requires an annual report from operators storing the Vertebrate Toxic Agent 1080 (sodium fluoroacetate). In addition, timber treatment sites require a location certificate from WorkSafe.

10.1.2 under section 212 (g) (ii) of the Health and Safety at Work Act 2015 (HSWA)) may prescribe (by order in council) the quantity of the substances to be recorded

10.1.3 Parasiticides are defined in the Veterinary Medicines (Limited Pack Size, Finished Dose) Group Standard and the term includes endoparasiticides and ectoparasiticides. We note that the reporting proposal is to apply to substances used in large food producing animals. Parasiticides used in companion animals and working animals are excluded. The terms large animals, companion animals and working animals are defined. However, small food producing animals (such as poultry) appear to be excluded.

10.2 FAO practices recommend a "weight of evidence" approach to pesticide incident evaluation, but do not recommend a report framework. Therefore, to make well informed decisions about whether a pesticide can reasonably be associated with the reported adverse health or environmental effects, both general and specific background information provide the context for specific incident reports. General background information on a national or regional level includes:

- pesticides available and in common use in the country – active ingredients and product formulations (held by EPA and ACVM).
- pesticide import and national sales statistics[3]; preferably product specific (available through NZ Customs Joint Border Management System);
- types of crops treated, specific data on products (information already held by EPA, ACVM).
- products known to be used in the locality;
- common and recognized patterns of use in the locality (EPA chemical mapping);
- type of recommended treatment of poisoning and whether it is commonly available (available from WorkSafe).

10.3 Unless there is a common framework the duplication or mismatch of data will render the proposed reporting inconsequential and will not add to the knowledge of what is there in the NZ environment.

10.4 Chemical contamination issues do not only affect the biophysical domain. They have social and cultural dimensions. For example, considerations of harm might consider whether taonga species are particularly sensitive to a chemical.

10.5 Sales data would include that which is not exposed to the NZ environment, such as products:

- Exported overseas (and not used in the NZ environment);
- Disposed of as out of date, obsolete, orphaned chemicals through approved

[3]Available from a number of sources that require payment https://app.indexbox.io/report/3808/554/?_gl=1*1oekgw9*_ga*ODUwOTA1NTA2LjE3MTE0OTQ3MzE.*_ga_6KCVGEDSJE*MTcxMTQ5NDczMC4xLjAuMTcxMTQ5NDczMC4wLjAuMA..

channels:

- That meet the term ‘sale’ (under Consumer Act) also includes (*a) barter, delivering or disposing of by way of gift, loan, or otherwise; and (b) giving or distributing, during business, as a sample or other- wise, without charge.*

10.6 The issue of the question as to what chemicals are a priority to the New Zealand environment could be answered through the EPA Chemical Map project (expected delivery June 2024) to provide the level of harmful chemicals (Page 47 of the EPA annual report)4 actually of concern in the environment in NZ, rather than theoretical supposition. The chemical map would also determine the fate of chemicals in ground water etc., as well as other environmental factors.

11. Economic and Feasibility of Request

Economic conditions

11.1 Conditions remain challenging for our growers and farmers. There is high potential for the reporting requirements (volume, concentration of hazardous compounds etc.) to translate into further costs passed onto growers/farmers who are already under considerable pressure. (Noting the 2024 economic year prediction is that sheep farmers will not break even)

11.2 Conditions remain challenging for our members with the current product registration environment restricting the introduction of new products to the New Zealand market. Many companies are reconsidering and scaling back their investment in New Zealand, including supply of niche products/uses that are critical to support New Zealand primary industry and processes that underpin our trade reputation.

11.3 The short notice period provided to industry for the significant level of increased regulatory requirements in an already over regulated market is also noted, noting budgets for the 2024/25 year have already been set.

Outcomes of the request for sale price volume data – are not fully clear

11.4 A major question from our members is what the information requested will be used for and is the level of detail gained from sales data secure when the market is small (competitors’ volumes easily extrapolated when there are few manufacturers in a market). In discussion it was provided that small data groups would not be shown publicly.

11.5 Further there is the prospect of the data requested inadvertently being exposed. Noting in 2021 the EPA inadvertently released scientific data sheets, as part of a decision, exposing the formulation of an application contravening the confidential requirement specified by applicants and the international patient registered through ACVM. .

11.6 Return-on-investment principles[5] do not appear to be clear. We are unable to reconcile a 1.5 FTE increase for EPA, increase funding for an unknown tool to gather data (estimated at $1M) when there is significant backlog of applications and other statutory responsibilities under the HSNO Act that are not being met to the statutory requirements (section 53 HSNO Act for applications).

[4] https://www.epa.govt.nz/assets/RecordsAPI/EPA-Annual-Report-2023.pdf
[5] NZ Treasury requirement

12. Request data from Joint Border Management System

The PCE examined the Customs data and concluded: "*For a regulator or other party interested in import volumes, non-specific tariff codes or insufficient volume data limit the insights that can be gained because it is not always possible to isolate information about specific active ingredients*.
The granularity of the chemical classifications within the New Zealand tariff system could be increased, (under section 97AA of the HSNO Act and in line with the Biosecurity Act 1993) by obtaining meaningful insights using smart tools whereby the quantity of chemicals within imported goods would be identified and the appropriate metrics applied (as Biosecurity NZ does through various tools such as Power BI). Noting the concentration of chemical within the finished product is not recorded, but this would be available from the form already submitted to the EPA for importation (prior approval of the importation of a hazardous substance) or ACVM database. This would answer what HSNO chemicals are coming into NZ. What is coming through the EPA system and what is not.

Benefits:

- Provides live data as opposed to annual data that is out of date. Live data allows a more proactive and meaningful determination of HS in New Zealand and meets the criteria in the problem definition **A** *monitor trends in chemical use*

- Investment efficiency gains can be had through integration with other regulators such as MPI's IT system e.g. food safety, biosecurity that extracts and converts data measurements. Removing the high dependency on an unknown IT investment with indeterminant outcomes.

- As base data the total imported and the total exported would be determined, providing the remainder as what is available for application.

- Remove the issues associated with the Consumer Guarantees Act that would compromise manufacturers and importers should shares of market be known and non-competitive behaviour (price collusion or cartel) is avoided.

- The EPA and ACVM data base can be investigated for the chemical compounds and formulations.

- The Chemical map (once complete) would enable the EPA to identify the chemicals of concern in the environment in NZ.

As a compliance tool this avenue of data would generate more useful data, limit the outlay required of importers, manufacturers, and EPA; and provide the data in real-time for actions to be taken should they be necessary.

13 Responses to questions in the discussion document

Question 1 *Are there any hazardous substance groups you believe are missing from the scope proposed for the quantity reporting requirement? If so, please describe your comments in detail.*

The identification and restriction of data to large food producing animals, would indicate that the EPA is interested in those chemicals that have use on food producing plants. It would therefore require the EPA to identify the same chemical scope.

Question 2 *Are there any hazardous substance groups listed in the proposed scope which you believe should not be included? If so, please describe your comments in detail*.

There are only two organisations importing timber treatments, therefore extrapolating data will identify each individual company. Therefore, it would be inappropriate for commercial reasons to make such information publicly available.
As per the new requirements under the Consumer Guarantees act, all efforts *must be undertaken to preclude those with substantial market power to make the conditions for entry more difficult where the firm has the ability to influence the creation or maintenance of regulatory barriers*.

Along the same lines as Question 1, it would be appropriate to identify chemicals that are applied to food (rather than ornamentals or inanimate objects).
Fumigants are used on inanimates as well as food and are air pollutants and are subject to monitoring requirements under WorkSafe). Is it EPA's intention to also require the same data as Biosecurity and WorkSafe in this area?

Question 3 *Are the terms "agrichemicals", "timber treatment chemicals", "antisapstain chemicals" and "antifouling paints" sufficiently clear to define which hazardous substances are in scope and to which the quantity reporting requirements will apply? If not, please describe your comments in detail.*

As per Question 1, it depends on the scope the EPA wishes to provide, the audience the data is determined to be for, and the purpose of the extended list of chemicals of interest (already in NZIoC).

Question 4 *Are the terms "parasiticides" and "large animals" sufficiently clear in relation to the veterinary medicines in scope and to which the quantity reporting requirements will apply? If not, please describe your comments in detail.*

No. The use of 'large animals' in the terminology would exclude other food sources (such as poultry) from the definition. It is also unclear where some large animals would fit into this definition, e.g. are horses within the definition of 'food producing'. What about products that are used for both food producing and non food producing animals?

As per Question one. If there is a differentiation between food producing animals and non-food producing animals, then there is a need to apply that same thinking to plants (food as opposed to ornamental, etc.).

Question 5 *Do you have any comments regarding the proposed additional chemicals of interest which are listed in Appendix 4? If so, please describe your comments in detail.*
The Vet Med Standards rely on the NZIOC list as chemistries already approved in NZ; agrichemicals rely on EPA approval to import and manufacture agricultural chemicals. Adding to the list, a set of chemistries essentially under reassessment internationally would preclude the reassessment process; and confuse the priority settings where chemistries are considered not specific to New Zealand environmental concerns but rather reflect international environmental concerns.

Question 6 *Are the existing terms "importation", "importer", "manufacture", and "manufacturer" (in relation to hazardous substances) sufficiently clear to define the activities related to hazardous substances and to which the quantity reporting requirements will apply? If not, please describe your comments in detail.*
As per paragraph 3.9 there is duplication (of regulation and regulator duties) across several Acts and the definitions should align.

Question 7 *Do you have any general comments regarding the proposed scope of hazardous substances and to which the quantity reporting requirements will apply? If so, please describe your comments in detail.*

Question 8 *Do you have any comments regarding our proposal to focus the reporting requirements on the quantities of active ingredient within formulated products rather than quantities of the formulated product? If so, please describe your comments in detail*.

Reporting quantity would be of active ingredients in formulated products (rather than total quantity of the product) for each calendar year and by kilogramme or part kilogramme. As a comparison (and to preserve confidentiality of the active ingredient make up), the Australian Pesticides and Veterinary Medicines Authority (APVMA) requires data on the quantity of the formulated product (not the active ingredient) and then uses the product registration information to calculate the active ingredient and report publicly on the active ingredient quantities.

It is noted that APVMA Act allows for the collection of sales data as a levy is paid based on sales of an approved product. This is not a legislative requirement in the HSNO Act.

Within the New Zealand market, it is common for only one or two importers/manufacturers to use a specific active, therefore the active and company sales can be readily identified. The market share information and IP is therefore compromised.

Question 9 *Do you envisage any practical challenges that importers or manufacturers may face in reporting on the quantities of active ingredients in their products? If so, please describe your comments in detail*.
These will confuse and create complications for manufacturers and importers:

- duplication of requirements between the HSNO, ACVM, Input and Exports (Restrictions), Biosecurity, and HSWA acts.
  - legal intent of the HSNO Act
  - selection of some actives (under appendix 4)
  - selection of some but not all parasiticides (large animals only)
  - and other exceptions (excludes those substances for personal use, research purposes)

The request for data excludes export data (chemical is not used in the NZ environment) or that disposed of (orphaned or out of date or expired chemicals) to approved sites. Sales data would not account for the above anomalies.

Some chemicals are imported and manufactured in large quantities for export. Inclusion of these products would render the data highly inaccurate unless efforts are made to segregate them.

Question 10 *Beyond certain biological pesticides, are you aware of any other substances within the proposed scope where reporting on the quantities of active ingredient would not be possible or would be challenging for importers or manufacturers? If so, please describe your comments in detail. In answering this question, it would also be useful if you could offer suggestions for any alternative options for the reporting requirements.*

Where the reporting of the substance would identify the participant and market. For instance, there are only two providers of timber treatment product in New Zealand. Providing such data would directly compromise both parties market share and intellectual property as the active ingredient would be reported alongside the data. As per question 9, there are many exceptions to the data requested that will complicate the requirement and render the data unusable.

Question 11 *Do you have any comments on the proposed frequency of annual reporting on the quantities of hazardous substances imported and manufactured? If so, please describe your comments in detail.*

As noted, there are better options to the proposed reporting framework (real-time data provided through the Customs JBMS).

Question 12 *Do you have any comments regarding our proposal that the reporting period be based on a calendar year? If so, please describe your comments in detail.*

As per question 11.

Question 13 If we used a calendar year for the reporting period, do you have any comments on when each year the reports should be due by? If so, please describe your comments in detail.

Collecting data for year-end 31 March, does not reflect the agricultural chemical season, which concludes 30 June.

Question 14 *Do you believe that a minimum quantity threshold should be set for the quantity reporting requirement? If so, please describe your comments in detail, including: • why a threshold should be set • how it should be set • what threshold value should be set • whether this should apply to all hazardous substances in scope or to certain groups of these hazardous substances*.

Question 15 *Do you have any comments regarding the submission tool the EPA should consider for submitting and storing the quantity information provided by importers and manufacturers? If so, please describe your comments in detail.*

We believe that the EPA should align data gathering with other government regulators (i.e. WorkSafe, ACVM, EPA Importers and Manufacturers application process) who have experience in this area, keep information confidential and maintain a live data stream.

14 About Animal and Plant Health NZ

We are the peak industry association representing more than 85 multinational and New Zealand based companies that manufacture, distribute, and sell crop protection and animal health products that keep our animals healthy and crops thriving. Our mission is to protect and enhance the health of crops, animals, and the environment, through innovation and the responsible use of quality products and services.

Our objectives are to:

- Strive for effective and sustainable animal health and crop protection technology through industry leadership and advocacy.
- Achieve a balanced and science-based regulatory environment that gives members freedom to operate and grow in New Zealand.
- Enable farmers and growers to supply high quality food and fibre into domestic and global markets.
- Create an environment that encourages competition through innovation.
- Promote stewardship and responsible use of products.
- Support the health and wellbeing of pets, livestock, and people.