



APICULTURE
NEW ZEALAND

SUBMISSION

TO: Environmental Protection Agency

FROM: Apiculture New Zealand

SUBMISSION ON: Submission on Implementation of the Globally Harmonised System of Classification and Labelling of Chemicals

DATE: 18 December 2019

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The following submission is presented by Apiculture New Zealand on behalf of its Science and Research Focus Group. Members of the **Apiculture New Zealand Science and Research Focus Group** include:

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Dr Pike Stahlmann-Brown

1. Apiculture NZ represents the interests of beekeepers and honey bees in New Zealand. Beekeeping in New Zealand is now one of New Zealand's fastest growing export enterprises and presently supplying the world with very high value honey products. The industry also plays a critical role in providing pollination services to the New Zealand horticulture and arable seeds sector. It is therefore very important that New Zealand protects this resource by ensuring the safety and health of the honey bees.
2. The Apiculture New Zealand Science and Research Focus Group has been an active participant in the EPA approval process for a number of years. We believe this experience allows us to offer constructive suggestions for improving the EPA decision-making process.
3. Our purpose is to ensure that the New Zealand apiculture industry benefits from relevant research undertaken both in New Zealand and overseas.
4. We support the EPA's proposal to update New Zealand's current hazardous substance classification system to Revision 7 (2017) of the Globally Harmonised System of Classification and Labelling of Chemicals (GHS).
5. The move to this classification system will mean we are aligned internationally, ensuring consistency with overseas practices around classification.
6. We recognise there will be costs and resources involved in the move to GHS but believe the benefits are significant and will result in greater efficiencies over the long term.
7. Regarding EPA's request for views on which GHS building blocks to adopt (and outlined below), Apiculture New Zealand retains a neutral position as this is outside our area of scope and expertise?
 - a. To not adopt GHS acute toxicity Category 5 (HSNO 6.1E)
 - b. To not adopt GHS skin irritation Category 3 (HSNO 6.3B)
 - c. To not adopt GHS aspiration hazard Category 2
 - d. To adopt all seven GHS categories for aquatic toxicity
8. Regarding EPA's proposal to replace the current HSNO classification categories "for terrestrial ecotoxicity (9.2, 9.3 and 9.4 and 9.1D biocides with a classification category for "substances that are ecotoxic in the terrestrial environment" which will be applied only to agrichemicals or related substances as defined in Appendix 1", Apiculture New Zealand supports this approach noting that information on terrestrial ecotoxicity will continue to need to be provided in section 12 of the Safety Data Sheet. It is critical that during this change process that there is no compromise to ensuring clear information for the consumers on impacts on bee health. Don't my understanding is that change is this will not remove the need to have warnings/labels stating product is dangerous to bees but will remove need for it to be on things like housepaints and cosmetics so I assume we are ok with this?.

9. While we would like to see a speedy transition to the new classification system, we appreciate this is a significant change and so accept the additional two-year transitional period for compliance with EPA Labelling Notice, Safety Data Sheet Notice and Packaging Notice. Of course, if agrichemical companies can internally speed up the process to transition to the new classification system, including labelling, this would be viewed positively by our industry.

10. We wish to be involved in any future public participation (submissions and hearing) in the assessment and reassessment process. (DON DO WE NEED TO?)