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THE AGCARM NEWSLETTER

JULY 2012

Agcarm conference looms



If you're unfamiliar with Agcarm, we're the peak industry association for businesses involved in plant and animal science.

If you have an interest in these sectors, consider attending our next conference to learn more about current issues in crop protection and animal health, and network with key people in our member companies.

Our conference is on Thursday 19th July and Friday 20th July at Te Papa, Wellington.

Agcarm's day and a half conference includes top government and industry speakers, a field trip to Parliament and the National Institute of Water and Atmospheric Research (NIWA), dinner at Betty's, plus our popular quiz night. And, there's plenty of time for networking.

The non-member registration cost per person is \$450, plus \$120 for the optional meal/quiz night. If you would like to become a member of Agcarm the cost per person would be \$265, plus \$95 for the meal/quiz night. All figures include GST. ■

Thursday 19th July and Friday 20th July at Te Papa Museum, Wellington.

Register at www.agcarm.co.nz

Efficacy data off agenda until protection sorted

The willingness of Agcarm members to provide efficacy data is being curbed by the government's refusal to protect the data from unfair commercial gain.

"The real elephant in the room when we have this conversation with the Ministry for Primary Industry is data protection and its reluctance to toughen up on this. It's an issue we have voiced our concerns on many times in the past decade and submitted strongly on last year," says Agcarm chief executive Graeme Peters.

Agcarm maintains the regulator's weak laws around data protection are stymieing New Zealand's ability to preserve a leading edge in livestock and crop production (see page two). Peters cited the access Australian veterinarians enjoy to animal health products, compared to Kiwi vets.

"They have three times the number of products, largely thanks to protection of eight years on data for products, compared to only five years here. If a new use is found for that product then that protection will be extended to 11 years - here there is no such protection."

Any discussion around New Zealand manufacturers supplying even more data in the form of efficacy information was off until data protection was addressed, he said.

"Our members have agreed to compile the efficacy data, but it's simply not in anyone's competitive interests to supply information that will be so freely available on release."

Peters acknowledges the legal requirements under the Agricultural Compounds and Veterinary Medicines Act

(ACVM) to provide efficacy data have been confused to date.

"We are okay with the ACVM regulator's decision to reinterpret the legislation, requiring efficacy data to be provided for all situations. It will clear that uncertainty up.

"However we believe data provision and protection is a two-way street - the ACVM regulator is not giving anything back by way of protection to our members."

Agcarm was wholly supportive of a workshop convened by ACVM to air issues around efficacy data, said Peters, who says that, aside from data protection, "the devil is also in the detail around efficacy data".

"This includes determining what applications will require efficacy data, whether the definition of a 'new registration' only applies to new actives, or new uses for existing products.

"We are also, of course, seeking assurances efficacy data cannot be cross-referenced by competing companies."

Peters confirmed that ACVM had not offered any official response to Agcarm's submission on data protection it received in December. ■



Delays keeping NZ agriculture in chemical dark age

Government dithering around agrichemical data protection is threatening New Zealand's reputation as a leader in crop and food production, Agcarm says.

"The delay, since the last consultation which has extended for over six months now, is preventing the crop protection and animal health industries from picking up new generation chemicals. As a country we are facing a limited choice of solutions to dealing with pests and diseases in crops as animals," says Agcarm chief executive Graeme Peters.

Agcarm made a submission to government late last year on the vexed issue of data protection. Its extensive submission sought a fairer data protection regime, a view supported by several other industry groups, including Federated Farmers and grower groups.

The Environmental Protection Authority (EPA) has signalled that it wants to remove or severely restrict some older generation chemicals used in New Zealand, including carbamates and organophosphates.

Some of New Zealand's trading partners, including the EU, are currently reviewing the status of these chemicals and pressure is on for alternative 'softer' chemistries to be used. In many cases, these alternative new generation chemicals with more specific targeting properties exist, but they are less likely to be marketed in New Zealand under present data protection rules.

Couple this with lack of support for reassessment of older chemistries means farmers and growers could be left with fewer

chemistries and not able to access the most modern ones.

Currently there is only five years data protection around new substances before a copycat product can be registered simply through cross referencing the pioneer company's data, according to Peters.

"Cross referencing the copycat product to the pioneer company's data, free of charge, sees it essentially using the pioneer company's intellectual property for nothing. Ten years protection is far more typical for most countries."

In a small market like New Zealand, the payback period as it stands now is simply too long to make launching new chemicals and veterinary medicines attractive under such a short protection period, he argues.

As a result, Agcarm is asking government to extend data protection for new products, new uses, and new formulations to 10 years.

Right environment needed

While the desire by government to see older chemicals removed from use was admirable, Peters says the right environment has to be in place to foster the launch of new ones.

Peters cited the example of border control fumigant methyl bromide that comes with a contentious public health history. An alternative product in the form of sulfuryl

fluoride is available to replace it in some areas of fumigation.

"However, the company making it gets no data protection on the product. With New Zealand being a small market, that company needs 10 years protection on its product to get a decent return on its investment. The result is New Zealand misses out on the alternative product."

The ability to use new generation chemicals on small volume crops - often high value produce with the potential to develop further if adequate crop protection options were available - is also inhibited by lack of data protection.

"Present protection is zero, and the proposed 0-3 years is little better," he says, adding that Agcarm has sought 10 years on new use protection so growers of small volume crops like kumara and tamarillos can benefit from the latest control technology available to growers of higher volume crops like kiwifruit and grapes.

Even broad acre pastoral growers are suffering from the lack of data protection. An Agcarm member company has indicated it has proprietorship of a spray technology that is effective at controlling grass grub, a pest costing the industry \$90 million a year. However lack of data protection means this company will not be launching the product here. ■

Paraparaumu student one step closer to career in animal care



Some students would take a holiday or buy a flat-screen TV, but a Paraparaumu veterinary science student has a more pragmatic use for her recently-won \$2,500 scholarship.

Emily McColl, 27, has just received her scholarship from Agcarm, the industry association for companies which manufacture, distribute and sell products that keep animals healthy and crops thriving.

Emily (far left) plans to spend her winnings on a practical investment - travel costs, text books and university equipment.

"To make the most of studying it's so important to have good resources. The Agcarm scholarship will be a great help

in ensuring I have the best textbooks and equipment while I'm studying.

Emily is studying toward a Bachelor of Veterinary Science, although becoming a veterinarian was not her initial career choice.

"My original intention was to get into human medicine. I did some volunteer work in a hospital, but it just wasn't for me. Now that I've started studying veterinary science, I couldn't imagine myself doing anything else.

Rules making branding risky

Misleading and ambiguous brand names on agrichemical and veterinary products are being made more so by uncertainties surrounding the labelling guideline produced by the regulator.



"There have been several instances lately where trade names for products have proven misleading and could easily be misinterpreted as entirely different from the purpose the product is intended for," Agcarm President Justin Hurst says.

The concerns revolve around both veterinary products and crop protection products. ACVM guidelines state a trade name should not be identical to an active ingredient. However, there have been instances where this has been loosely interpreted by manufacturers who choose to sail close to the legislative wind.

"Industry members agree ACVM documents on labelling are not the best and should be amended to be clearer around this point, among others."

One recent example of this is the registration of the product Levamisole SC, sharing its name with the worm treatment active ingredient called Levamisole. Other examples are Abamectin Pour On, Abamectin Sheep, and Cephalixin Paste, almost identical to the active ingredient names.

"Products being sold with a trade name the same as the active are essentially gaining an unfair competitive advantage.

There is a need for ACVM rules to be clearer about the need for a product name to be distinctive, and unique."

Concern over the ambiguity of naming products has risen further with product names that cross over between uses, or even between crop protection and veterinary medicines.

The most concerning example of this was an animal health pour-on to control lice on cattle that shared its name (Synergy) with a range of pesticide additives.

"Regardless of the fact the two products may have been serving different markets, often the farmer consumer is one and the same and the storage point for both products could well be the same, making a mix up at administration quite possible - and possibly calamitous."

Increasing the risk further is the reliance upon staff to administer a dose of a product, possibly casually referred to simply by its brand name, resulting in the wrong one being applied.

Concern over labelling ambiguity is not a recent one, ACVM promising in 2010 that the rules and wording around labelling would be clarified.

"There are issues here not only around competitive advantage, particularly when one active may have several means of application that crop and vet professionals need to present to clients; there is also the more chilling concern about what could happen if similarly labelled products for very different uses get mixed up by users," says Hurst.

"This may also be an issue with veterinary authorisations, which are prescriptions for animal health products, as there may be ambiguity between active ingredients and trade name products." ■

'Industry members agree ACVM documents on labelling are not the best and should be amended to be clearer.'

The winner of Agcarm's \$2,500 horticultural science scholarship was Pukekohe-based Michael French (left).

The 20-year-old Bachelor of Agri-Science student at Massey University says there aren't many students coming through with a specific interest in horticulture, but he sees it as a great career path.

He intends to spend his winnings on practical investments; some new textbooks and a contribution to his student loan.

"Working towards the Agcarm scholarship has given me a real reason to

aim for good grades. I'm also grateful to Agcarm for helping me raise my profile in the industry, which will be extremely valuable when I finish my degree and start looking for full-time employment."

Michael believes it is important for organisations such as Agcarm to support horticulture at a tertiary level, as it encourages students to get involved with the industry.

"Horticulture is an industry that not a lot of younger people are aspiring to be a part of, and it needs to be encouraged.

The profile of horticulture needs to be raised: the industry won't grow without new research and the manpower to extend it."

The two runners up in the Agcarm veterinary science scholarship - Tessa Boys and Gabrielle Bisschops - were presented with Diseases of Cattle in Australasia, the definitive text on cattle practice in Australia and New Zealand. The \$400 books were kindly donated by Merial Ancare. ■

The buzz around pollinator health

Recent news coverage has been focusing on an important part of agriculture: the health and population levels of bees. *Input* readers may see even more media coverage during National Bee Week, taking place 20-24 August, which creates an excellent opportunity to highlight the importance of bee health and the insects' relationship with food production.



Bees are responsible for more than just honey; the list of crops that bees help grow is extensive and includes grapes, strawberries, avocados, and cucumbers.

Honeybees help pollinate more than 75 percent of flowering plants and approximately 75 percent of commodity crops; this represents hundreds of millions worth of New Zealand food and agriculture production annually.

So why are some bee colonies disappearing in some parts of the world? There are a number of factors that clearly cause declines in bees, including:

- Increased losses due to Varroa mite;
- Diseases such as Israeli Acute Paralysis virus and the gut parasite Nosema;
- Pesticide poisoning through inadvertent exposure to pesticides;
- Habitat loss for foraging and inadequate forage;

- Poor nutrition and migratory stress brought about by the increased need to move bee colonies long distances to provide pollination services.

Science unclear

Do pesticides applied for agricultural crop protection purposes kill bees? Yes, if used improperly, and certain pesticides can be bad for bees. However, that is not the same question as 'do pesticides cause Colony Collapse Disorder (CCD)?', which is a distinct syndrome with clear signs.

Since 2006, some US beekeepers have reported 30-90 percent losses in bee-hives and these losses have often continued. Many times, these losses are attributed to CCD, but the scientific literature from the last few years is mixed as to the cause of the disorder.

Lab trials don't match field trials. Wide dose ranges and modes of delivery are used for the research trials and results are inconsistent from study to study.

Something is certainly going on, but if

pesticides (in particular, the neonicotinoid class of pesticides) were the primary factor in bee deaths, one would expect more coherence in the literature.

Adding this together, it is not possible today, using available data, to pinpoint a certain class of pesticides as the cause of CCD.

Since the general public mostly see just a few papers that are reported by the media, it creates the illusion that there is far more evidence that pesticides could cause CCD than actually exists.

An incredibly complex host of factors makes it hard out there for bees of all sorts - and not just honey bees. Scientists have to evaluate all of them and how they might interact, to keep bees healthy.

Farmers and the crop protection industry understand that bees are crucial to agriculture and nature. They are working with regulators around the world and leading bee research institutes to help find a solution.

...and the facts

Colony Collapse Disorder

- a) **Scientists believe that a combination of stressors can limit the viability and health of a colony.**
- There is a difference between natural bee loss and Colony Collapse Disorder. CCD is a clearly defined syndrome with specific symptoms and scientists cannot attribute these losses to any singular cause.
 - Only 26 percent of all cases of higher bee mortality reported in the US in 2009 are attributed to CCD.
 - The cause of CCD is unknown and many organisations are actively involved in trying to understand why it is occurring.
- b) **Certain studies have attempted to link *neonicotinoids*, a class of insecticides, as a cause of CCD. Many of these studies fail to recreate practical in-field solutions of pollinator exposure to pesticides or pollinator behaviour and ignore the many possible threats that bees face.**
- Scientific literature examining the potential causes of CCD is incredibly varied and will need additional research.
 - When used properly and according to label, there has been no demonstrated, extraordinary negative effect on bee health associated with use of neonicotinoid-based insecticides.
 - The allegations of these new studies of widespread harm to pollinators contradict nearly two decades of responsible use of these important pesticides on many millions of crop acres worldwide. In fact, some pesticides are used to protect bees from mites that can infect hives.
 - When used improperly, pesticides can be harmful to bees. As such, farmers and growers are trained to apply crop protection products strictly according to the label directions. The labels are created under the HSNO Act and ACVM Act, which carefully evaluate any potential environmental or health hazards.
- c) **Crop protection products contribute to the success of agriculture and aid habitat and species protection.**
- All crop protection products must undergo a demanding review process with the New Zealand Environmental Protection Authority (EPA) - in addition to reviews by larger regulators such as the US EPA - which involves more than 120 tests for environmental and health safety.
 - Only the safest and most effective products make it to market and are used in the field; in fact, only one in every 139,000 potential products is approved for use.
 - Seed treatment technology and crop protection products provide a targeted and effective means of application that reduces the number of applications, helps increase yields and safeguards the environment.
 - Crop protection products help farmers increase yields without increasing land use, optimise the use of existing farm space, preserve water quality and aquatic habitats by reducing soil erosion, and protect native plants and animals from invasive species. ■

Silent Spring - 50 years on

Fifty years ago, a ground breaking book credited with helping launch the modern environmentalist movement was published, reports Graeme Peters.

Rachel Carson's *Silent Spring* provided an insightful look at the development and use of crop protection products and the unintended impacts of first generation pesticides.

Carson's research is today recognised by the manufacturers of agrichemicals as an important book for the crop protection industry, consumer well-being and environmental safety.

Silent Spring was primarily about the impact of the insecticide DDT on bird life. The book's thesis was that pesticide use harmed not only animals and birds, but also humans.

DDT is credited with saving many lives by preventing the transmission of malaria, especially in tropical countries. After WWII, DDT was made available for use as an agricultural insecticide with production peaking in the 1960s.

Carson, renowned as a first-rate biologist, linked DDT to the thinning of egg shells, in particular from birds of prey.

The short-term acute effects of DDT on humans are minor but long-term exposures have been associated with chronic, or long-lasting, health effects. Probably the biggest issue with DDT was that it was 'persistent'. It took a long time to break down and therefore persisted in the environment.

DDT is a Persistent Organic Pollutant (POP), named as causing adverse effects on humans and the ecosystem. *Silent Spring* was a catalyst for change and had a huge impact.

Regulator formed

This included an investigation into Carson's claims and, ultimately, the formation of the United States Environmental Protection Agency (EPA) to regulate the crop protection industry.

Product registration, training and pest management strategies were all outcomes of this one book.

In 1972, DDT was banned in the US.

Stricter controls were placed on its use in New Zealand before it was deregistered in 1989.

A more modern and risk-averse approach to crop protection has undisputedly benefited people and the environment.

For example, DDT was cited as a reason for the bald eagle, the national bird of the United States, almost becoming extinct in the 1950s.

After DDT was banned, along with other changes, the bald eagle's population rebounded and the species was removed from the US federal government's list of endangered species in 1995.

A lot can happen in half a century, including a sea change in the public's expectations on health and safety.

Another area which has undergone much improvement has been transport. Today, we have many rules and regulations which curb speeding and unsafe driving, and encourage safety. But, in 1962, you could legally drive or be a passenger in a car with bald tyres and no seat belts. You could also presumably drive drunk, because there were no breath and alcohol tests until 1969.

The progress in car safety, rules and driver behaviour has been mirrored in the agrichemicals industry too.

Thorough process

Pesticide development and testing by the crop protection industry, and U.S. Environmental Protection Authority (EPA) registration, takes an average of nine years. It costs pesticide manufacturers about \$US200 million for each crop protection product introduced to market.

On average, only one in 139,000 potential pesticide products successfully makes it through the regulatory process from discovery laboratory to the farmer's field.

Today in New Zealand, all crop protection products undergo a rigorous



approval and registration process under the auspices of the main environmental regulator, also called the EPA. All applications for agrichemicals and other hazardous substances and new organisms are evaluated by a decision-making committee of the EPA.

Health, economic, social and cultural well-being of all people, communities and iwi must be taken into account by the committee. Public submissions may be invited and a public hearing may be held before the application is approved or declined.

Special conditions

The decision includes special conditions, or controls, on the substance or organism to manage its environmental effects and risks. All users must comply with these conditions.

The Ministry for Primary Industry (MPI) is also a regulator of crop protection products. MPI's responsibilities include a rigorous process for assessing each product, and ensuring any tiny trace chemical residues in food meet internationally-acceptable levels for healthy food.

So read *Silent Spring*. Historian Linda Lear notes in her thoughtful introduction to the anniversary edition, that it's "a book to relish, not for the dark side of human nature, but for the promise of life's possibility".

In late spring, I'm woken by a cacophony of morning song from birds perched on my guttering. I wonder if Rachel Carson's legacy helped preserve these feathered alarm clocks? ■

Article first published in Agribusiness magazine.

Group Standard takes another step closer

Efforts to remove excessive regulation on low-risk animal health products have taken another step closer. An assessment report by Environmental Protection Authority (EPA) staff is backing an industry 'group standard', which will trim red tape while increasing regulatory efficiency and access to medicines.

A group standard is an approval method for a wide range of similar products with certain properties. Most domestic and workplace chemicals, except for pesticides, veterinary medicines, timber treatment chemicals and vertebrate toxic agents, are approved under group standards.

Developed by Agcarm, the group standard for veterinary medicines includes a set of conditions that enable low-risk substances in pack sizes of under 500 grams or 500 millilitres to be managed to minimise adverse effects. The draft standard was accepted by the EPA last year and, in June, EPA staff put forward their report on the application to an EPA decision-making committee.

Staff said that they had assessed the draft, making appropriate modifications to better manage risks, and were ready to recommend the "issuance of a Group

Standard for limited pack size finished dose veterinary medicines".

Other benefits of a group standard include better alignment with overseas labelling requirements, and a reduction in superfluous labelling requirements, which is more consistent with the requirements for human medicines

Concerned about the amount of regulation over veterinary medicines, Agcarm set out two years ago to remove veterinary medicines from being regulated by the EPA as many veterinary medicines are similar or the same as human medicines, which are exempt from controls imposed by the EPA.

Though an exemption was sought, it soon became clear that a similar outcome could be achieved with less difficulty through a group standard.

The current Hazardous Substances and New Organisms (HSNO) regulatory process is costly (up to \$16,875 plus disbursements) and time consuming. It places, at best, unnecessary and, at worst, ridiculous controls on products. The controls also create labelling hassles which make it difficult to match labels with those of other countries. Our closest neighbour Australia will not accept the hazardous substance labelling requirement on its labels - another obstacle to accessing a wider range of products.

Agcarm chief executive Graeme Peters says there has been lots of dialogue and compromise with the EPA, including the removal an entire class of substances for which the risks outweighed the benefits. These products will continue to require a full assessment by the EPA. ■

A message from Rob Forlong

The EPA values its good working relationship with Agcarm and its members, which has seen us collaborating on several projects in recent years.

These projects have been diverse in nature, and have included producing retail posters to remind people they need a current Approved Handler Certificate to purchase and use some products.

We were pleased to work with Agcarm to help industry develop its own best practice with regard to preparing container labels to be used for both crop protection products and veterinary medicines that are hazardous substances. This resulted in the EPA-approved Agcarm Code of Practice on Labelling.

More recently, in conjunction with the ACVM Group, we streamlined the regulatory regime for plant protection products and veterinary medicines used in special circumstances. The Agricultural Compounds Special Circumstances group

standard removed the need for separate approvals from two organisations for this type of product use.

We are currently streamlining the application process for Hazardous Substances Part 5 applications to import and manufacture veterinary medicines, chemical pesticides, and industrial chemicals, while continuing to ensure that approved chemicals can be safely and responsibly managed. Agcarm members have been involved in this project since its inception and have provided valuable information at all stages including the review of draft application forms and associated information for applicants.

We look forward to release of the new streamlined process and associated forms in July, marking another example of constructive collaboration that helps protect people and the environment, while enabling economic progress and innovation. ■



■ ROB FORLONG
CHIEF EXECUTIVE,
ENVIRONMENTAL PROTECTION AUTHORITY

Web-based portal for safety information on way

A one stop solution for all agrichemical safety information is on the horizon for Agcarm members in 2013.

"The demands on agrichem' retail staff to provide product safety notes is frequently a time consuming, multi-sourced routine that members would like to see streamlined and sourced from a single point," says Agcarm's Graeme Peters.

At present retailers have to source safety data sheets through a labyrinth of hard copy data held in-store, on individual company websites - and even occasionally Google.

Agcarm hosted a workshop on the issue late last year that was well attended by a cross section of the agrichemical industry, from manufacturers to retailers and compliance agencies. All were intent on developing a shared solution.

"It became rapidly apparent the Novachem website was the ideal platform from which to access data. Its subscriber-driven revenue base ensures the site has the incentive to be updated regularly and the capacity to cope with the multiple products on the market," Peters said.

The workshop has resulted in the industry preparing a Heads of Agreement to support a website portal allowing Agcarm members to access the Novachem database and other non-agrchemical safety information.

Once accessed, subscribing Agcarm members can download single-page Haznotes, for transporting agrichemicals,

or the longer Safety Data Sheets, which can, in turn, be printed off or emailed to purchasers' PCs or smart phones.

All parties attending the workshop had agreed they did not want a multiplicity of data entries, files or old technology to access the required information.

"Such a portal will provide its users with access to a resource updated continuously and, subject to review once a year, far more thorough and efficient than what is available at present."

Information on non-agrchemical products will also be held, with distributors providing lists of their top 500 products requiring datasheets, from veterinary medicines through to tail paints.

Funding is to be spread proportionately reflecting distributors' sales outlets and also includes \$10,000 of seed funds from Agcarm.

"We are looking at kicking off in the New Year. Indications are that members will see significant savings in time, stress and unnecessary documentation once the database goes live," says Peters. ■



"At present retailers have to source safety data sheets through a labyrinth of hard copy data held in-store, on individual company websites - and even occasionally Google. "

What is Agcarm?

Agcarm is the industry association which represents crop protection, animal health, and rural supplier businesses. Agcarm members distribute and sell the majority of veterinary medicines and crop protection products in New Zealand.

Agcarm members promote responsible use of products right through the product life cycle, from research to disposal.

Agcarm is also a positive voice for its members and lobbies for a progressive regulatory environment.

For information on joining Agcarm, go to www.agcarm.co.nz and visit 'How to Join'.

Agcarm

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