

SUBMISSION ON

Proposed Ban of Chlorthal-Dimethyl

10 October 2025

To: Reassessments, Environmental Protection Authority

Name of Submitter: Horticulture New Zealand

Contact for Service:

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks the Environmental Protection Authority (EPA) for the opportunity to submit on the "Proposed ban on chlorthal-dimethyl" following its reassessment and welcomes any opportunity to continue to work with the EPA and to discuss our submission.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

Submission Form

Please indicate whether you intend to present on behalf of your submission if a hearing is held for this application

- ☐ I wish to present on behalf of my submission
- ☒ I do not wish to present on behalf of my submission.

Are the views expressed on behalf of an individual or an organisation?

- ☐ I am expressing my own personal views
- ☒ I am expressing the views of a company, organisation, or business group

Please indicate which submitter group(s) you belong to:

- ☒ Industry group

Do you agree with the EPA's proposal to revoke the approvals for chlorthal-dimethyl?

- ☒ Yes
- ☐ No
- ☐ Agree or oppose in part

HortNZ's Role

Background to HortNZ

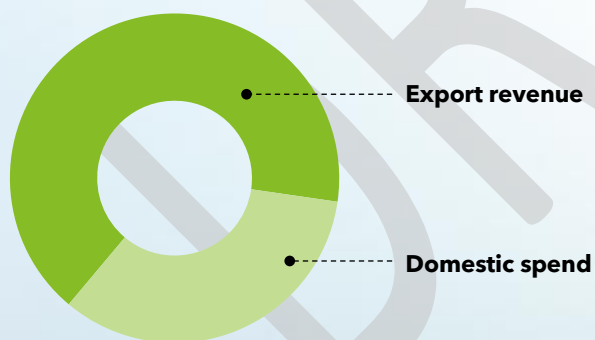
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain, and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



Industry value \$7.54bn

Farmgate value \$4.89bn

Export revenue \$4.99bn

Domestic spend \$2.55bn

Source: HortNZ Annual Report 2025

Executive Summary

HortNZ supports the Environmental Protection Authority's (EPA) reassessment and proposed ban of chlorthal-dimethyl due to its non-negligible impacts on human health and environment. However, the loss of another crop protection tool also emphasises the importance of EPA continuing to actively prioritise the registration of new chemistry with practical conditions, and label claims.

New Zealand's commercial allium (onions, shallots, garlic) sector has reduced chlorthal-dimethyl use in recent years and have been transitioning to alternative crop protection tools and methods to manage wireweed. Whenever our growers have access to modern and more environmentally friendly alternatives, they proactively and voluntarily move away from the old ones. Programmes like *A Lighter Touch*¹ showcase the industry's investment in moving towards agroecological approaches to crop protection.

Many growers are concerned that chemicals such as chlorpyrifos and upcoming chemicals being reassessed are being taken away without newer products being approved promptly to replace them. This means increased risks of not being able to adequately control pests, diseases and weeds. If this trend is not reversed, New Zealand's horticulture growers will increasingly struggle to be commercially viable while meeting global market and environmental standards, and they will be unable to provide healthy, safe, and suitable fresh fruit and vegetables for people to eat.

Implementing recommendations from the recent Agricultural and Horticultural Products Regulatory Review should assist in modern crop protection tools being available in New Zealand quicker while ensuring risks to plant, animal, human health, trade, and the environment are managed.

HortNZ welcomes further collaboration with EPA, the Ministry for Primary Industries, and industry stakeholders to strategically align regulatory efforts to improve access to innovative solutions.

Collaborative efforts will move each and every crop toward the Aotearoa Horticulture Action Plan (AHAP)² goal of doubling the farm-gate value of horticulture by 2035 in a way that improves the prosperity for our people and protects our environment. Key priority 1.3 in the AHAP sets out the agreed aspiration to *increase crop protection, management and biosecurity tools*. Fit-for-purpose regulatory settings that allow New Zealand growers to access globally approved sustainable chemistry and integrated crop protection tools will be critical to enhance production, meet market expectations, adapt to future growing conditions, and increase food security.

¹ [A Lighter Touch – Changing the way we protect our crops, for the better](#)

² The [Aotearoa Horticulture Action Plan | Horticulture New Zealand – Ahumāra Kai Aotearoa](#) is a jointly-developed collaborative framework across industry, Māori, researchers and government to achieve the ambitious goal of doubling the farmgate value of horticultural production by 2035.

Submission

Consultation Questions

Q. 1 What feedback do you have on our proposal to immediately ban chlorthal-dimethyl and its use, with a transition period of six months for disposal?

HortNZ supports EPA's reassessment findings and proposal to immediately ban chlorthal-dimethyl with a six-month transition period for its disposal. This would align with international regulatory developments to ban chlorthal-dimethyl where recent evidence indicates the risks it poses to the environment and human health (worker safety) are non-negligible, particularly to reproductive toxicity.

At the same time, HortNZ would like to highlight to EPA the importance of enabling our growers to access new and safer crop protection tools with practical conditions as older tools are phased out.

Q. 2 What is the current use of chlorthal-dimethyl in New Zealand?

At the time of HortNZ's [previous submission](#) on the use of chlorthal-dimethyl in August 2024, most fruit and vegetable sectors were not using it except for the commercial allium sector (onions, shallots, garlic) who used it occasionally to control wireweed at the pre-emergent stage.

Nationally, the number of applications is low and had been declining in recent years with most onion growers having not applied it at all. The following table shows chlorthal-dimethyl's declining use in recent years sourced from records that cover approximately 80% of the crop protection products applied to commercial onion crops.

Growing Season	2020-21	2021-22	2022-23	2023-2024	2024-2025
Number of applications made nationally	24	10	8	TBC	TBC

Q. 3 What feedback do you have on the risks of chlorthal-dimethyl and mitigations for these risks?

HortNZ agrees with EPA's reassessment of chlorthal-dimethyl that the environmental and human health risks cannot be mitigated acceptably, particularly for sensitive populations. Although commercial allium growers in New Zealand take many steps to mitigate these risks from chlorthal-dimethyl products by following control measures on product labels

and in their regional plans, these steps appear insufficient for sensitive populations even with full PPE as evidenced in EPA's Staff Assessment Report and referenced recognised international regulator assessments.

Where applicable, HortNZ supports evidence-based assessments based on domestic and recognised international regulator assessments to assist in decreasing reassessment processing times, reduce duplication of effort, and to focus resources on processing new active ingredients. Alignment with international regulatory approaches also reinforce the need for regulatory consistency to ensure market access and consumer trust and New Zealand's international reputation.

Q. 4 What feedback do you have on the benefits of chlorthal-dimethyl (where possible, the specific benefit due to chlorthal-dimethyl, including economic benefits)?

HortNZ agrees with Sapere's Economic Assessment in that it is difficult to quantify the benefits of chlorthal-dimethyl, particularly with onion growers already transitioning to alternatives. The chemical benefit of chlorthal-dimethyl is its effectiveness - it is a control applied when the wireweed is in the seedling stage. Applying at this early stage is more effective as mature wireweed plants show greater tolerance to many herbicides. Wireweed is an aggressive and challenging weed to control that can outcompete crops by forming dense mats of vegetation which can smother crop seedlings and prevent the crop from establishing.

Q. 5 What feedback do you have on costs if chlorthal-dimethyl cannot be used, including the cost of replacing chlorthal-dimethyl with alternatives?

HortNZ agrees with Sapere's Economic Assessment in that it is difficult to quantify the costs of chlorthal-dimethyl, particularly with onion growers already transitioning to alternatives. There are cheaper alternatives available, but cost differences between chlorthal-dimethyl and the alternative products depend on required application rates to achieve the same level of efficacy.

Growers have indicated that a ban of chlorthal-dimethyl products would not have major costs for their businesses as it is not used widely. One grower we spoke to had ceased its use following US EPA's immediate ban in August 2024. The availability of chlorthal-dimethyl products in New Zealand is also limited meaning an eventual loss of access to this active ingredient, with two of the three products being withdrawn by product registrants following the US and Australia's immediate bans last year.

Growers have been proactive in finding alternative crop protection products and programmes to manage wireweed. HortNZ urges the EPA to prioritise the approval of new chemicals over removing older ones, enabling a smoother transition. Otherwise, due to limited alternative pest control options, growers may need to continue use of less effective remaining herbicides which can lead to resistance as the number of applications of a product per season is restricted in new chemistry labels to manage resistance development.