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Submission in response to the Environmental Protection Authorities' call for information on Glyphosate

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INTRODUCTION

1. Horticulture New Zealand (HortNZ) appreciates the opportunity to make a submission in response to the Environmental Protection Authority (EPA) call for information on glyphosate.
2. HortNZ advocates for and represents the interests of New Zealand's 6,000 commercial fruit and vegetable growers. The horticulture industry is valued at \$6.73b with \$4.55b in exports annually and employs over 60,000 people. It occupies some 80,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply the majority of fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas.
4. Efficacious control of weeds is vital to enable growers to successfully produce crops for New Zealand and the world and glyphosate is a vital tool in achieving this.

THE IMPORTANCE OF HORTICULTURE TO NEW ZEALAND

5. Fruit, vegetables and berries provide a significant national benefit to New Zealand in terms of food supply and security, contribution to GDP and employment.
6. Growers produce crops throughout New Zealand's regions. These crops are sent to a diverse range of domestic and export markets and channel significant revenue and job

opportunities into the regions where some of New Zealand's largest social and economic challenges exist.

7. The horticulture sector is vital to New Zealand's economic recovery from the impacts of covid 19. Economic recovery must focus on opportunities that offer growth. The horticulture sector provides this opportunity as we have a positive track record of growth that is expected to continue.
8. HortNZ and growers play a lead role in assisting the government's Fit for a Better World¹ goals. In order to add \$44 billion in export earnings over the next decade, growers need to be able to continue to sustainably control weeds in their crops and prevent losses.

COMMENTS ON THE CALL FOR INFORMATION

9. In many types of horticultural production weed control is necessary to stop weeds competing with crops for water, space and nutrients. When crops are competing with weeds, the result can be significantly lower yields, often to the point that production would be running at a loss. Depending on the crop, it is also possible that quality may be impacted to the point that harvesting is not worthwhile as what is produced is unsaleable.
10. Weeds can provide a reservoir for pests and diseases. Accordingly, controlling weeds on boundaries is an essential practice to control current and future diseases and pests, keeping them away from crops.
11. Globally weeds, as well as pests and diseases, result in an estimated 26-40% of crop production not being realised each year ². Potential food is wasted throughout the product lifecycle, including at the growing stage. This is predicted to double without access to crop protection tools³. Food waste has a negative environmental and economic impact.
12. Growers need access to a range of herbicide actives to manage weeds. Glyphosate is critical to crop production and plays an important role in growers' toolbox for successful weed control.
13. The horticulture sector is continually looking for new and better ways to do things, including in the crop protection space. The sector is proactively discussing which pesticides are used, how they are used, and what efficacious alternatives are available, if any.
14. Part of this work is via the *A Lighter Touch* programme, a seven-year project to transition from agrichemical pest management to agroecological crop protection. The programme focuses on understanding the agroecosystem and reducing the opportunity for pests to thrive, which will in turn reduce the need for crop protection interventions. Increased understanding of options such as biopesticides and biological control agents will allow these tools to become embedded into crop protection programmes. It is expected that overall agrichemical use and resistance risk will reduce.
15. However we are not there yet - the *A lighter Touch* programme is still in the early stages of its seven year lifespan, and there is much more work to do before any new tools become available. Until programs such as *A Lighter Touch* advance and other alternative chemistry options have been developed, important agrichemicals such as glyphosate should not be taken out of the toolbox.

¹ www.fitforabetterworld.org.nz/

² OECD-FAO Agricultural Outlook 2012-2021

³ OECD-FAO Agricultural Outlook 2012-2021

16. Glyphosate has a favourable safety profile with products often only triggering low degree hazards for human health and toxicity to aquatic invertebrates. This makes it a preferred option for growers to include in their herbicide rotations, in combination with other active ingredients.
17. There are no efficacious alternatives to glyphosate at present. Different modes of action must be rotated to minimise the development of herbicide resistance.
18. To ban, phase out or overly restrict glyphosate's use would jeopardise growers' efforts to prevent herbicide resistance and follow good agricultural practice in the production of their crops.
19. Additionally, glyphosate and other herbicides are essential biosecurity tools that need to be readily available to rapidly control exotic weeds that could negatively affect native plants, forests and crops.
20. Glyphosate is a very important crop protection tool for many in the horticulture sector and we request that glyphosate remains approved and available for growers to use.
21. Organic growers do not use glyphosate and do not support this submission.

CONCLUSION

1. The continued availability of glyphosate is vital to growers and the wider horticulture sector.
2. HortNZ welcomes the opportunity to discuss the points raised in this submission with the EPA.
3. This submission is supported by:
 - Central Otago Fruitgrowers Association
 - Citrus New Zealand
 - Gisborne Produce Growers Association
 - Gedye Bros Ltd
 - Katikati Fruitgrowers Association
 - New Zealand Apples & Pears Inc.
 - New Zealand Asparagus Council
 - New Zealand Avocado
 - New Zealand Buttercup Squash Council
 - New Zealand kiwifruit growers incorporated
 - NZ Kiwiberry Growers Inc
 - Process Vegetables NZ
 - Pukekohe Vegetable Growers Association
 - Strawberry Growers New Zealand Inc
 - Summerfruit New Zealand
 - TomatoesNZ
 - Vegetables New Zealand Inc

ENDS