Applicant:

UPL New Zealand Limited

Name of substance:

UPL2207

APPLICANT CHECKLIST			
Mandatory sections filled out	☒	Appendices enclosed	☒
Initial fees enclosed	☒	Signed and dated	☒
Electronic copy of application emailed to EPA	☒		

Office use only

Application code:

Date received:

EPA contact:

Initial fees paid: $

Application version no.:

Important

1. You can talk to an applications advisor at the EPA, who can help you scope and prepare your application. We need all relevant information early on in the application process. Quality information up front will speed up the process.
2. This application form may be used to seek approvals for more than one hazardous substance where the substances are related – for example, a concentrated compound (active ingredient) and its related formulations, or a range of substances for similar purposes to be tested in a field trial.
3. Any extra material that does not fit in the application form must be clearly labelled, cross-referenced, and included in an appendix to the application form.
4. Commercially sensitive information must be collated in a separate appendix.
5. Unless otherwise indicated, all sections of this form must be completed for the application to be progressed.
6. You can get more information at any time by contacting us. One of our staff members will be able to help you.

   Environmental Protection Authority
   Private Bag 63002
   Wellington
   New Zealand
   Telephone: 64 4 916 2426
   Facsimile: 64 4 914 0433
   Email: HSApplications@epa.govt.nz
   http://www.epa.govt.nz

Section 1 – Applicant details

1.1 Name and postal address in New Zealand of the organisation making the application:

Name: UPL New Zealand Limited

Address: [redacted]

Phone: [redacted]

Fax:

1.2 The applicant's location address in New Zealand (if different from above):

Address:

1.3 Name of the contact person for the application:

This person should have sufficient knowledge to respond to queries and either have the authority to make decisions that relate to processing the application on behalf of the applicant, or have the ability to go to the appropriate authority.

Name: [redacted]

Position: [redacted]

Address: [redacted]

Phone: [redacted]

Fax:

Email: [redacted]

Section 2 – Application type and related approvals required

This form is only for an application to import a hazardous substance into containment, or manufacture a hazardous substance in containment.

2.1 Is this application to manufacture or import a hazardous substance in containment for any of the following purposes?

Containment applications can only be made for a limited range of purposes. In particular, the substance must not be intended for commercial manufacture or sale.

Small amounts of any hazardous substance for use as an analytical standard, where approval to import or manufacture that substance has been declined?	☐ Yes	☒ No
Research on any hazardous substance to acquire information for use in assessing that substance for a HSNO approval?	☒ Yes	☐ No
Research and development on any hazardous substance?	☒ Yes	☐ No
Use in an emergency?	☐ Yes	☒ No
Formulating, relabelling, repackaging, or storing any hazardous substance for export to a destination outside New Zealand?	☐ Yes	☒ No
Other purposes?	☐ Yes	☒ No

2.2 If you answered 'yes' to one of the purposes listed above, please provide some supporting detail. If you answered 'yes' to 'other purpose', describe the purpose and explain why this purpose is appropriate to a containment application.

Approval is sought, pursuant to section 30(b) of the HSNO Act 1996, to import UPL2207 for use in trials under containment. The intention is to conduct small-scale contained field trials to provide information for development of the products. We propose to conduct a number of small plot replicated field trials over a period of up to three years.

The substance is a bio-stimulant.

Some of the information for this compound is limited as it is experimental and not yet commercialised elsewhere. Sufficient information will be available to acknowledge the hazards and risks involved with the proposed use of the product.

The maximum volume is expected to be 50 litres per season for UPL2207. The product will be imported into New Zealand for use by qualified personnel in trials.

It is proposed that UPL2207 will be used in containment trials in various regions of New Zealand and be used in compliance with the controls assigned to this approval.

This product will be applied to trial sites and individual test plots by ground application methods.

A Safety Data Sheet, and the full formulation has been attached to this application.

We do not intend to trial this substance by air, or by applying to waterways.

2.3 Is the information in this application relevant to import, manufacture or both?

Import the substance(s) only?	☒ Yes	☐ No
Manufacture the substance(s) only?	☐ Yes	☒ No
Import and manufacture the substance(s)?	☐ Yes	☒ No
If import only, indicate whether or not manufacture is likely in New Zealand:	☐ Yes	☒ No

2.4 If the information in the application relates to manufacture of the substance(s) in New Zealand, provide information on the proposed manufacturing process and any alternatives.

N/A

2.5 If this substance(s) needs an approval under any other legislation, has an application for this approval been made?
(Optional)

Name of approval	Application made
Agricultural Compounds and Veterinary Medicines Act 1997	☐ Yes ☐ No ☐ NA
Food Act 1981	☐ Yes ☐ No ☐ NA
Medicines Act 1981	☐ Yes ☐ No ☐ NA
Chemical Weapons (Prohibition) Act 1996	☐ Yes ☐ No ☐ NA

Radiation Protection Act 1965	☐ Yes ☐ No ☐ NA
Biosecurity Act 1993	☐ Yes ☐ No ☐ NA
Resource Management Act 1991	☐ Yes ☐ No ☐ NA
Other (please specify):	
	☐ Yes ☐ No
	☐ Yes ☐ No
	☐ Yes ☐ No

Section 3 – Information on the substance(s)

Note that all information that is commercially sensitive must be attached as an appendix. The application form should be cross-referenced to the appendix but should be able to be read as a stand-alone document (which will be publicly available).

If approval is being sought for more than one hazardous substance, this section must be completed separately for each hazardous substance.

3.1 State the unequivocal identification of the substance(s).

This section should include all information necessary to unequivocally identify the substance(s) and may include:

- Chemical name (Chemical Abstracts Preferred Index name or IUPAC name)
- Common name
- Synonyms
- Trade names
- CAS Registry number
- Molecular formula
- Structural formula
- Impurities.

For mixtures, in addition to the above information being provided on the actual mixture, information is also required on the composition of the mixture – ie, the chemical name, CAS number, function (eg, active ingredient, emulsifier, surfactant, filler) and percentages of ALL components of the mixture (including non-hazardous components and impurities) should be provided. This information may be best expressed in tabular form. If the composition is variable, please ensure to state the limits.

If there are commercial reasons for not providing full information in the main part of the form, alternative approaches must be discussed with and agreed by the EPA. These must include the provision of a unique identifier of some kind.

- UPL2207 is a liquid containing a mixture of trace elements

3.2 Provide information on the chemical and physical properties of the substance(s).

Provide as much information as possible on the chemical and physical properties of the substance(s) [at 20°C and 1 atmosphere unless otherwise stated] – eg:

- Appearance (colour, odour, physical state or form)
- pH
- Density
- Vapour pressure
- Boiling/melting point
- Solubility in water
- Water/octanol partitioning co-efficient.

For mixtures, information is required on the chemical and physical properties of the mixture itself. However, if this information is not available, you should provide information on the chemical and physical properties of EACH hazardous component of the mixture.

Please see the submitted preliminary SDS for all the known information on phys-chem properties.

3.3 Provide information on the hazardous properties of the substance(s).

Information should be provided on the hazardous properties of the substance(s) known to the applicant. You should consider each of the six hazardous properties below and provide information on those hazardous properties. This information is needed in order to assess risks and determine whether or not, and how, the substance can be adequately contained.

- Explosiveness
- Flammability
- Oxidising properties
- Corrosiveness

- Toxicity
- Ecotoxicity.

If your substance is a mixture and you cannot provide direct information on its hazardous properties, you can apply mixture rules to the hazardous components of the mixture. If you do this, then you will need to provide information on the hazardous properties of each hazardous component of the mixture, and show your workings.

The preliminary Safety Data Sheet for UPL2207 has been provided to the EPA.

Skin corrosion/irritation, Category 2 H315

Serious eye damage/eye irritation, Category 1 H318

Hazardous to the aquatic environment — Chronic Hazard, Category 3 H412

3.4 Provide information on what will happen to the substance throughout its whole life, from its introduction into New Zealand, its uses, through to disposal.

The information provided needs to reflect the containment character of the application. It will be used in the development of exposure scenarios and the assessment of risks, and hence the specification of the containment conditions.

The life cycle of the substance in New Zealand is as follows:

1. **Importation of samples**

   Samples are supplied by a reputable international manufacturer of Agrichemicals. The smallest quantity required for one seasons work is ordered. The substance will be imported fully packaged, with the compound contained in a suitable container and packed in UN approved packaging or similar sealed containers with absorbent material included to ensure that leakage cannot occur. Samples may be shipped by sea or air to New Zealand.

2. **Transportation of samples from point of entry to trial director**

   Samples are delivered to our storage facility in Pukekohe. Tranied staff there receive the samples.

3. **Storage of samples**

   UPL New Zealand Limited have a dedicated sample storage area which is part of the larger commercial storage facility at 45 Kitchener Road, Pukekohe. Samples are stored here under lock and key with access limited.

4. **Dispensing of samples into trial quantities**

   This is done within the storage area which has laboratory and repacking facilities for this purpose. Prepared samples are packaged in leak proof packaging with sufficient absorbent material to ensure that no leakage of product can occur.

5. Transportation of trial samples to trial sites

Samples may be delivered by UPL New Zealand staff or by courier to the Professional Research Contractor who will organise secure storage until required at the trial site. The required quantities for the trial will either be pre-measured before transport to the trial site or taken in original packaging and measured at the trial site. All research contractors used by UPL New Zealand utilise specialised chemical proof bins for the transport of trial samples to and from a trial site.

6. Preparation of spray treatment mixture

Specialised precision equipment is used for application. This equipment allows for very small treatment mixtures to be prepared and used. Measurement of the required sample is done on accurate scales. The measured amount is added to water in the spray tank of the application equipment ready for application.

7. Application of spray mixture

Only professional research contractors are used by UPL for the conduct of trials. Each operator utilises trial application equipment that can be calibrated to apply accurate dose rates of products to the target area. For smaller plots, applicators will use hand held precision sprayers that utilise compressed air, motorised pumps or CO_2 to pressurise the spray tank. The small spray mixture is then applied to replicated plots which are normally in the order of 2-3 m X 5-10 m (20 m^2) but can be up to 50m^2.

8. Disposal of surplus spray mixture

Surplus spray material is kept to a minimum by use of specialist research spray equipment. Any left over spray is collected and disposed of in a manner that reflects the products' hazards. Disposal can be via spraying out onto bare ground within the trial area or removal and treatment with activated charcoal, depending on the hazardous properties of the product.

9. Disposal of used containers

Where possible, sample containers are recycled. This is through placement in the Agrecovery scheme after being triple-rinsed. If this is not possible they are buried in a suitable landfill.

10. Disposal of treated produce

Treated produce is disposed of by accepted trial produce disposal methods. It does not enter the food chain.

11. Disposal of surplus samples

Surplus samples of product that do not reach full ACVM registration and HSNO approval are returned to the original manufacturer. Where approval and registration is achieved they may be donated for use according to approved label instructions.

12. Site close off

Research contractors will ensure that no treated produce has entered the food chain and that it has been disposed of by the approved methods.

13. Accidental Release

The potential for accidental release of sample product is minimised in the first instance by minimising the volumes of product moved and used within the research programme. It is further mitigated by utilising good packaging techniques and specialised chemical proof bins by our contractors. In the event of a spill, containment materials are kept readily available at our storage facility in Pukekohe and by our contractors. Accidental release from trial sites is managed by our trial contractors by making applications only when conditions are suitable.

3.5 Provide information on the quantity of the substance proposed to be imported or manufactured.

This information is used in the development of exposure scenarios and the assessment of risks.

Approval is sought to import a maximum of 150 litres of UPL2207 over the three year trial period.

Section 4 – Information on the proposed containment system

4.1 Provide information on the proposed containment system.

It is essential that good information is provided on the containment system because the adequacy of containment, in conjunction with the hazardous properties of the substance, will have a major impact on whether or not approval is given.

You will need to provide a description of the containment proposed AND information on how you intend to address the following issues (proposed controls):

- Methods for preventing the escape of the contained hazardous substance and preventing the contamination of the facility
- Methods for excluding unwanted organisms from the facility or to control organisms within the facility
- Methods for excluding unauthorised people from the facility
- Methods for preventing unintended release of the substance by experimenters
- Methods for controlling the effects of any accidental release of the substance
- Inspection and monitoring requirements of the containment facility.

A management plan may be attached as an appendix. This plan should specify the procedures for implementing the above methods for containing the substance(s), and provide details of the qualifications of the person responsible for implementing those controls.

The proposed containment system for the trials using these plant protection compounds is outlined below. The containment system covers controls:

1. To limit the likelihood of escape of any contained hazardous substance or contamination by the hazardous substance.

2. To exclude organisms or control organisms.

3. To exclude unauthorised people.

4. To prevent unintended release of the substance by technicians working with the substance.

5. To control the effects of any accidental release of the substance.

6. For inspection and monitoring requirements.

7. On qualifications required of the person responsible for implementing the controls.The containment system is designated by the proposed controls. These controls are designed to provide safeguards commensurate with the limited information available about the hazard of these substances.

Proposed Controls

Methods for preventing the escape of the contained hazardous substance and preventing the contamination of the facility

The storage facility is designed to prevent release of agrichemicals into the environment. Secondary containment is in place for many areas of the facility, and this is designed to cope with an emergency hitting full production batches. It will be more than capable of coping with the small sample batches being produced under this approval.

Methods for excluding unwanted organisms from the facility or to control organisms within the facility

In order to prevent contamination of the products the storage facility is a tightly controlled environment with security doors and triple-checks. These measures will also result in unwanted organisms being excluded from the area.

Methods for excluding unauthorised people from the facility

The storage site is a secured site preventing unauthorised people from entering the facility. Storage areas are locked, and have security alarms in place. All visitors are required to sign in and out to keep a record of who has been there.

Methods for preventing unintended release of the substance by experimenters

Product leaving the storage facility will be fully packaged in an appropriate manner.

Methods for controlling the effects of any accidental release of the substance

The site has an emergency management plan in place to cope with the commercial batches of agrichemicals which are produced there. These plans will more than cover the minor effects of any accidental release of these small volumes of sample products.

Inspection and monitoring requirements of the containment facility

In accordance with HSW, all staff working at the facility are suitably trained in the handling of agrichemicals. The facility is audited by MPI, as well as monitored closely by the multi-national companies who use it. By regularly being reviewed by the most discerning eyes in the production world, it ensures the facility stays up to date with the most modern practices and procedures for handling hazardous substances in a safe manner.

Trials

1. The trials may be carried out at a location that is not defined until an infestation of the target pest has been found, provided the applicant;

- has permission from the owner of the land to carry out the trial; and

- notifies EPA New Zealand of the locations as per control 20.

2. The trial sites shall be chosen so as to prevent the substance entering any surface water or groundwater system.

3. The trial sites shall be located to prevent any building where people live or work being exposed to the substance. Access to the trial sites shall be by permission of the Trial Director or owner of the property on which it is located. The trial site boundaries shall be clearly marked and distinctly visible from outside the trial site throughout the life of the trials. The primary access points shall be signed indicating that unauthorised access is not allowed, that the site is subject to a trial, and that the crops should not be removed or disturbed.

4. Access to the trial sites shall be by permission of the Trial Director or owner of the property on which it is located. The trial site boundaries shall be clearly marked and distinctly visible from outside the trial site throughout the life of

the trials. The primary access points shall be signed indicating that unauthorised access is not allowed, that the site is subject to a trial, and that the crops should not be removed or disturbed.

5. The trial sites shall be secured by stock proof fencing to exclude grazing animals for the duration of the trial.

6. The substance shall be stored in accordance with good practice. This would generally be achieved through compliance with the Management of Agrichemicals NZS8409.

7. The substance shall be mixed, diluted and prepared in any other way prior to application in accordance with good practice. This would generally be achieved through compliance with the Management of Agrichemicals NZS8409.

8. The substance shall be securely packed in suitable containers that comply with the Hazardous Substances (Packaging) Notice 2017, and shall be labelled in accordance with the Hazardous Substances (Labelling) Notice 2017. A SDS, complying with the Hazardous Substances (Safety Data Sheets) Notice 2017, shall accompany each shipment.

9. The substance shall be transported in accordance with good practice. This may require compliance with the Land Transport Rule: Dangerous Goods 2005.

10. The substance shall usually be applied by way of handheld/ operator-worn equipment, using hydraulic pressure or compressed CO_2 or air on plots specifically designated and marked for each treatment, in accordance with good practice. This would generally be achieved through compliance with the Code of Practice for the Management of Agrichemicals NZS8409. Special attention shall be paid to the minimisation of spray drift, and in particular to the avoidance of drift beyond boundaries agreed with the owner of the trial site.

11. The personnel applying the substance to the crops shall be able to demonstrate that they have the knowledge necessary to carry out the trial.

12. No sprayed produce shall be consumed by people or animals or offered for sale unless approved under the ACVM act 1997.

13. Sprayed produce shall be disposed of by ploughing in, by mulching or by burial at an approved landfill (not to be diverted to any composting operation).

14. The amount of spray prepared shall be adequate for the trial site, but if there is any surplus spray mix it shall be disposed of within the trial site by being further diluted and sprayed over a marked and designated non-crop and non-grazed area at the site.

15. Any equipment used shall be rinsed after use with the appropriate detergent or decontaminant, and rinsate disposed of within the trial site by being sprayed over a marked and designated noncrop and non-grazed area at the site.

16. Surplus substance remaining at the end of the trials shall be returned to UPL New Zealand Limited for secure storage, exported or degraded to a non-hazardous substance.

17. Any accidental spillage of the unmixed substance or spray mix shall be contained, prevented from entering waterways, and absorbed with an appropriate absorbent material. This material shall be placed into sealed containers and disposed of at an appropriate waste disposal facility (which may include a landfill), subject to the facility’s waste acceptance policy.

18. A record shall be kept of all use of the substance.

19. Information on appropriate safety precautions necessary to provide safeguards against the substance’s ecotoxic and toxic properties shall accompany the substance at all stages of its lifecycle. This shall include information on the appropriate protective clothing that is to be used and relevant first aid measures for immediate action pending medical attention.

20. The EPA shall be informed in writing (by email) of the location, of the trials. Notifications shall also include the substance name and the EPA Approval Number.

21. If for any reason a breach of containment occurs, the Trial Director shall notify the EPA within 24 hours of the breach being detected. It is suggested that if a breach in containment results in contamination of a waterway, the relevant iwi authorities be advised.

22. The Authority or its authorised agent or properly authorised enforcement officers, may inspect the facilities and trial sites at any reasonable time.

Section 5 – Identification and assessment of risks

In completing this section, it is important that you take account of the proposed containment system you described in Section 4. We are particularly interested in knowing about risks that may still remain with the containment system in place. You will need to consider the effects on the environment and public health, including any social effects. You should also take account of the quantity of material involved and the number of different locations that may be involved.

Complete this section as far as you can.

5.1 Identify all of the risks of the substance(s).

Include information on potentially significant, possible risks of the substance and whether or not these risks are *likely* to be significant. It is important to think about the source of the risk – ie, the way in which the risk is created (the exposure pathway) and then the consequences of exposure. Risks should be considered in relationship to:

- the sustainability of native and valued introduced flora and fauna
- the intrinsic value of ecosystems
- public health (including occupational exposure)
- the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, valued flora and fauna, and other taonga
- the economic and related benefits to be derived from the use of the hazardous substance
- New Zealand's international obligations.

• Importation and transport

Insecure packaging or an accident could result in spillage of the substance either on arrival in New Zealand and unloading or during transport to the containment facilities. In the event of a transport accident between the airport and the containment facilities the environment could be exposed to the substance. The substance will be transported in solid form and therefore the environment could come into contact with it if the packaging split and a member of the public (or the driver) attempted to clean it up. If water is used to wash the product away it could reach stormwater systems or waterways and result in adverse effects on terrestrial ecosystems. Product will be transported in accordance with good practice and in compliance with any relevant requirements of the Land Transport Act 1998, the Civil Aviation Act 1990 and the Maritime Transport Act 1994.

• Manufacture

Not applicable.

• Storage

Inadequate containment during storage of the substance, prior to use, could lead to effects to the ecosystems through direct contact or spillage.

- **Dispensing and Mixing**

Similarly dispensing and mixing may pose risks to ecosystems if the product is spilled.

- **Use i.e. spraying**

There is a risk of adverse environmental effects on ecosystems and species, during application or via spraydrift. Spraying must be in accordance with the Code of Practice for the Management of Agrichemicals, NZS8409.

- **Disposal of surplus mix, surplus concentrate, treated produce**

Disposal risks relate to excess product remaining after the trial has been completed (at the storage facility), excess product taken to the trial sites and not used, and excess mixed product at the trial site. Excess product poses potential risks to ecosystems. Removal by contamination of unauthorised visitors/ animals accessing the site, or from product being moved from the site by water, air, or carried on workers clothing, may also lead to risks to the environment.

- **Accidents, natural hazards and sabotage**

Risks may arise from accidents, natural hazards such as earthquakes, and through sabotage or deliberate misuse of the substance.

The main benefit of the approval of this application is that these trials will allow evaluation of a new solution for plant protection, with the potential to provide farmers and growers in New Zealand a new tools to manage pests in a safe and effective manner with minimal environmental impact.

5.2 Provide an assessment of the potential risks identified in Section 5.1.

An explicit risk assessment only needs to be provided for those risks which might be significant. The assessment should consider whether the identified risks can be adequately managed by the proposed containment system, and the substance(s) itself adequately contained.

The assessment should include the nature, probability of occurrence, and magnitude of each adverse effect. The uncertainty bounds of the information contained in the assessment should also be discussed.

(Optional)

Pathway	Likelihood	Magnitude	Risk	Comment
Importation and Transport	Highly improbable	Minimal	Negligible	Small amounts of product, suitable packaging, SDSs

Storage	Highly improbable	Minimal	Negligible	Suitable storage facilities
Dispensing and mixing	Very unlikely	Minimal	Negligible	Trained personnel
Use	Unlikely	Minimal	Negligible	Trained personnel
Disposal	Very unlikely	Minimal	Negligible	Trained personnel plus disposal procedure
Accidents	Very unlikely	Minor	Negligible	Suitable storage facilities and packaging, trained personnel

All identified risks can be adequately managed by the proposed containment system. The relatively small amounts of this substance being imported and used at any one time means that the magnitude of any effect is low. In comparison to approved commercial products, these rates and volumes are incredibly low, meaning the magnitude of any potential harm is significantly reduced.

Although not identified in the table above, risks to the relationship between Māori and the environment have also been considered. We consider that this risk is mitigated by the proposed controls because:

1. The trial sites will be located on land that is used for the growing of agricultural/horticultural crops. Generally trial sites will be set well away from areas of public access, so it is highly unlikely that any forage activity will take place near them.
2. Due to the small quantities of product being tested, no long-term or widespread effects on the balance of the ecosystem can be expected. Should negative effects occur, they would be highly localised.

Section 6 – International considerations

6.1 The EPA is interested in whether this substance (or any of its components) has been considered by any other regulatory authority in New Zealand, or by any other country. If you are aware of this, please provide details of the results of such consideration.
(Optional)

It is commercial in the Netherlands.

Section 7 – Miscellaneous

7.1 Provide a glossary of scientific and technical terms used in the application.

Plot - a single homogeneous unit, being plant(s) or area, used for an assessment of a substance at a specific rate or concentration.

Project - a series of individual trials to characterise experimental compounds from the same chemistry and which are conducted over one or more seasons. The results of the individual trials are formally reported at the completion of the project.

Trial site - an area, being a group of separate but contiguous plots (either treated and/or untreated), with a specifically delineated and defined boundary.

7.2 Provide here any other information you consider relevant to this application that is not already included.

Section 8 – Summary of public information

The information provided in this section may be used in the EPA's public register of substances, required under Section 20 of the HSNO Act.

This summary information will be used to provide information for the people and agencies (eg, Ministry for the Environment, Department of Conservation, Regional Councils etc) that will be notified of the application, and for potential submitters who request information. This information will also be used to prepare the public notice of the application.

For these reasons, applicants should ensure that this summary information does not contain any commercially sensitive material.

8.1 Name of the substance(s) for the public register:
Please use a maximum of 80 characters.

UPL2207

8.2 Purpose of the application for the public register:

This should include an abstract (in a maximum of 255 characters) giving information on the intended use of the substance and why an application is needed, based on its hazardous properties.

To import into containment UPL2207 for the purpose of testing its effect on fruit development and colour promotion.

8.3 Use categories of the substance(s):

The EPA has adopted the system of use categories developed by the European Union, which identify various functional uses of substances. This information is pertinent to the assessment of exposure scenarios and the determination of risk, and is also useful for building up a profile of the substance. There are three sets of use categories. Within each of these, applicants should state which use categories are relevant to all intended uses of the substance(s).

1. Main category: There are four main categories.
2. Industry category: There are 16 industry categories.
3. Function/Use category: There are 55 function/use categories.

(Optional)

1. Main category: 3
2. Industry category: 1
3. Function/Use category: 38

8.4 Executive summary:

In this section, the applicant should provide a summary of information contained in this application, including:

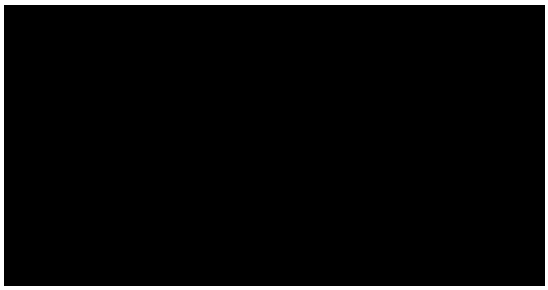
- the identification of the substance, its hazardous properties, intended uses and disposal
- an assessment of the adverse effects of the substance
- information on the proposed containment.

This is an application for a containment approval. UPL2207 is to be tested as a possible future crop protection product for the New Zealand market. This approval is critical to our ability to test new plant protection compounds during the research and development phase.

Approval is sought to import or manufacture in containment no more than 150 L of UPL2207 over the 3 year trial period, for the purpose of assessing its ability to balance fruit development and promote colour.

UPL New Zealand conducts a large number of trials each year, contributing a great deal to the knowledge held by the wider plant protection community. All new substances must be imported into containment via a containment approval, and used in line with our Operating Plan approved by the ACVM.

A long history of trials using this protocol, with no incidents occurring, supports our claim that these risks have been adequately and efficiently managed.



4 July 2022

Signature **Date**