



OIA25-0492

21 August 2025

Jon Muller
jonm123@me.com

Dear Jon Muller

Thank you for your email of 10 July 2025 to the Environmental Protection Authority (EPA) requesting information relating to trials on glyphosate and maximum residue levels (MRLs). Your request has been considered under the Official Information Act 1982 (OIA).

The public consultation on the proposed MRL amendments, including glyphosate, ran from 17 March – 16 May 2025. New Zealand Food Safety (NZFS) is currently considering the submissions on the proposed changes and no decisions have been made. A summary of these submissions will be placed on the Ministry for Primary Industries (MPI) website in due course.

NZFS is not willing to put consumer food safety at risk. The MRLs have been assessed in accordance with the best scientific methods that are also followed by other regulators around the world. Australia, USA, Canada, and the European Union (EU) all permit the use of glyphosate and have rules in place which reflect its use in those countries.

This dietary exposure assessment for glyphosate is explained in the *Proposed amendments to the New Zealand Food Notice: Maximum Residue Levels for Agricultural Compounds*, which is publicly available at <https://www.mpi.govt.nz/consultations/proposed-amendments-to-the-new-zealand-food-notice-maximum-residue-levels-for-agricultural-compounds/>.

If you wish to view the proposal, this can be found at <https://www.mpi.govt.nz/consultations/proposed-amendments-to-the-new-zealand-food-notice-maximum-residue-levels-for-agricultural-compounds/>. More information on glyphosate can be found at <https://www.mpi.govt.nz/food-safety-home/safe-levels-of-chemicals-in-food/fertilisers-pesticides-hormones-and-medicines-in-food/glyphosate-in-food/>.

The proposed changes to glyphosate MRLs were initiated due to survey data which indicated that when farmers used glyphosate according to the label directions for preharvest use in wheat, the MRLs for glyphosate in wheat were too low. The reassessment outcome led to proposed changes to the MRLs.

When this use of glyphosate was first approved in cereals the assessment concluded the default MRLs of 0.1 mg/kg would apply. New information from survey data indicated that the current MRLs do not support these approved preharvest uses.

Information is available in *The 2015/2016 Report on Pesticides in Fresh and Frozen Produce*, which is available at <https://www.mpi.govt.nz/dmsdocument/19922-The-20152016-Report-on-Pesticides-in-Fresh-and-Frozen-Produce-A-survey-under-the-Food-Residues-Surveillance-Programme-FRSP->.

MPI continues to evaluate the risk of residues from herbicides, including glyphosate. Details of glyphosate surveys are publicly available at: <https://www.mpi.govt.nz/food-safety-home/safe-levels-of-chemicals-in-food/fertilisers-pesticides-hormones-and-medicines-in-food/glyphosate-in-food/>. This webpage also includes information on how MPI regulates, monitors, and controls the use of glyphosate.

On 10 July 2025, questions two to six of your request were partially transferred from the Environmental Protection Authority (EPA), under the provisions of section 14 of the OIA, as the information requested is more closely connected with the functions of MPI.

On 7 August 2025 you were advised that the information had not yet been finalised for final release. Please accept my apologies for the delay in getting this information to you.

Your specific questions and my responses to these are outlined below and take into account the advice provided above.

We have been in discussion with MPI, NZFS and ACVM regarding the raise in MRL for Glyphosate from 0.1mg to 10mg/kg. We have been referred to the EPA regarding the trials on glyphosate and the MRL's that these bodies rely on.

In discussion with MPI they said that they worked off your safety trials regarding MRL's. We would like to refer you to the latest findings on formulated glyphosate-based herbicides regarding the health and safety to animals:

- 2 *Please may we have the glyphosate-based herbicides documents on the residue trial data trial on cereal and grains and pulses (RDACR 7.4 p 15/17)*

On 24 July 2025, you refined this question to the following:

- *We were asking for the health and environmental studies on the trials for Glyphosate and its residues in relation to cereals and field peas.*

The EPA is the agency responsible health and environmental matters for glyphosate and other pesticides. Therefore, your request should be directed to them on this.

The request for residue trial data is refused under Section 9(2)(b)(ii) – *to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who is the subject of the information.*

- 3 *Please can we have the relevant data trials on the safety for human residues for the cereal grains, field peas and pulses*

We have interpreted this request as data from toxicological studies. EPA is responsible for the assessment of toxicological studies and this request should be directed to EPA. However, if this is related to the dietary exposure assessment please advise.

- 4 *Please may we have the data studies that explain why glyphosate is more toxic in field peas (6mg/kg) than cereal grains (10mg/kg)*

The level of an MRL is not related to toxicity meaning a lower or higher MRL is not safer compared to another MRL (please refer to the advice given above). Therefore, your request is refused under section 18(e) of the OIA as the information does not exist.

We have been told that glyphosate is used preharvest on cereal grains, field peas and pulses and it is not allowed to be used as a desiccant as it is off label

5 Please can you advise us what weeds is the spray used on?


This part of your request is refused under section 18(d) of the OIA as the information requested is available in the public domain. Labels of glyphosate products registered under the Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997 (ACVM Act) can be found on the ACVM public register at [Ministry for Primary Industries - ACVM Register](#).

6 What this action does to raise glyphosate levels as it had desiccant properties that raise the residue levels

There is no glyphosate product registered under the ACVM Act that has a desiccant claim for cereals. Should an application be made to request a desiccant claim for a cereal crop then the applicant would need to provide information regarding the residue profile related to the timing and application rate, which could differ from the current pre-harvest weed control claim. As consequence of this, it could lead to an adjustment of MRLs.

Should you have any concerns with this response, I would encourage you to raise these with the Ministry for Primary Industries at Official.InformationAct@mpi.govt.nz. Alternatively, you are advised of your right to also raise any concerns with the Office of the Ombudsman. Contact details are: Office of the Ombudsman, PO Box 10152, Wellington 6143 or at info@ombudsman.parliament.nz.

Yours sincerely



Marion Castle
Acting Director Assurance