



# SUBMISSION FORM

For Hazardous Substance and New Organism Applications

**Once you have completed this form**

Send by post to: Environmental Protection Authority, Private Bag 63002, Wellington 6140

OR email to: [submissions@epa.govt.nz](mailto:submissions@epa.govt.nz)

Once your submission has been received the submission becomes a public document and may be made publicly available to anyone who requests it. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.

Submission on application number:	APP202804
Name of submitter or contact for joint submission:	Mark Procter
Organisation name (if on behalf of an organisation):	TPT Forests Limited
Postal address:	<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></div>
Telephone number:	<div style="background-color: black; width: 100%; height: 15px;"></div>
Email:	<div style="background-color: black; width: 100%; height: 15px;"></div>

 I wish to keep my contact details confidential

The EPA will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. We will use your contact details for the purposes of processing the application that it relates to (or in exceptional situations for other reasons permitted under the Privacy Act 1993). Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above. We may also use your contact details for the purpose of requesting your participation in customer surveys.

The EPA is likely to post your submission on its website at [www.epa.govt.nz](http://www.epa.govt.nz). We also may make your submission available in response to a request under the Official Information Act 1982.

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- I support the application
- I oppose the application
- I neither support or oppose the application

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**The reasons for making my submission are<sup>1</sup>: (further information can be appended to your submission, see footnote).**

TPT Forests SUPPORT the application to import EDN APP202804, as a fumigant for use on timber/logs under commercial conditions as per the details outlined in Addendum 1

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**All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.**

- I wish to be heard in support of my submission (this means that you can speak at the hearing)
- I do not wish to be heard in support of my submission (this means that you cannot speak at the hearing)

**If neither box is ticked, it will be assumed you do not wish to appear at a hearing.**

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**I wish for the EPA to make the following decision:**

Approval to import ethanedinitrile (EDN), a fumigant for use on timber/logs under commercial conditions

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<sup>1</sup> Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.

**TPT Forests Submission to the Environmental Protection Authority**

**Email:** EDN@epa.govt.nz

**TPT Forests SUPPORT the application to import EDN APP202804, as a fumigant for use on timber/logs under commercial conditions.**

***Introduction:***

1. TPT Forests exports annually approximately 5 million JAS of export logs from New Zealand with total sales revenue of approximately US\$700,000,000 (NZ\$950,000,000) from nine New Zealand ports - Northport, Port of Tauranga, Napier Port, Port Taranaki, CentrePort, Port Nelson, PrimePort, Port Otago – (Port Chalmers and Dunedin) to the export log markets of China, India, Korea and Japan.
2. TPT manage the export operations, shipping and sales on behalf of 14 different clients (Forest Owners and Managers) across New Zealand.
3. TPT directly contracts Marshalling, Stevedoring and Fumigation services, as well Port Companies to undertake the wharf log receipt, storage, materials handling, fumigation and vessel loading activities enabling logs to be exported to the destination markets.
4. TPT's export trading partners (China, India, Korea, Japan) determine what phytosanitary (fumigation) treatments are required for logs exported from New Zealand to their countries. The Importing Country Phytosanitary Requirements (ICPR) of both China and India require "on shore" fumigation treatment (in the Country of Origin) with Methyl bromide. While China does accept the use of Phosphine for a portion of the vessel being loaded ("in hold" portion), India however does not and therefore methyl bromide is the sole approved treatment for log supply to India.
5. Approximately 3.61 million JAS of TPT exported volume per annum requires phytosanitary fumigation treatment. 1.03 million JAS (~21%) of this volume is required to be treated with methyl bromide.
6. TPT recognize the previous ERMA review and the now EPA requirement that methyl bromide be phased out or recaptured by October 2020. TPT support good Environmental and Health and Safety practices and therefore have and continue to work with STIMBR and FOA to meet such requirements.

***Current issue and concern: No alternative fumigants to Methyl Bromide for "On Shore" and India "In Hold" fumigations:***

7. TPT are extremely concerned that methyl bromide may no longer be available for use in the future as a phytosanitary treatment of export logs due to:
  - a. changes in trading partner phytosanitary requirements or,
  - b. New Zealand environmental regulations/resource consents and,



c. not being able to commercially achieve the required application of 'recapture' technologies for either "in hold" or "on shore" fumigations.

8. New Zealand needs to be able to continue to use methyl bromide until a suitable alternative phytosanitary treatment is found which is technically and economically feasible and accepted by NZ trading partners. There are currently no other alternative fumigants to replace methyl bromide use. Once alternatives are available methyl bromide should remain as one of the possible fumigant treatments subject to approved controls. TPT believe there should be multiple methods available and approved to meet phytosanitary requirements.

9. If TPT were unable to export logs currently treated with methyl bromide to China and India due to no alternative fumigants being available there would be a significant negative impact on the commercial viability of the total log export program.

10. There would also likely be significant downstream impacts on the domestic manufacturing industry. The domestic market only processes ~15 million m3 per annum of the total ~33.5 million m3 per annum harvested across NZ, with the logs that are exported being primarily the lower grades from a tree and with the better quality pruned and structural logs, as well as pulp logs, consumed by domestic mills.

11. Forest Owners would be significantly impacted without a profitable export log market for the lower grade logs.

12. Thousands of New Zealand jobs rely directly on the export log trade, port logistics operations, harvesting and transport, as well the ancillary services that support the industry. TPT estimate 5-6 ancillary kiwi jobs support each individual job directly involved in the log export sector.

***EDN as an alternative:***

13. An internationally acknowledged review of scientific literature commissioned by Stakeholders in Methyl Bromide Reduction (STIMBR) identified 'ethanedinitrile' (EDN) as the most promising alternative fumigant to methyl bromide as a phytosanitary control measure having the potential to support the continued export of logs and lumber to a range of markets.

14. Draslovka, (a Czech based Company) has applied to the EPA for approval to register and import 'ethanedinitrile' (EDN) into NZ as an alternative to methyl bromide

15. STIMBR has been advised (subject to EPA approval) that EDN provides a cost-effective and environmentally acceptable alternative to Methyl bromide.

16. We note that EDN is not an ozone-depleting gas and it is not a greenhouse gas. It is highly volatile, breaks down rapidly and dilutes more quickly and easily in the environment degrading to form ammonia and carbon dioxide. It does not remain as a residue in the environment nor does it accumulate in either the soil, or in plants or animals.

***TPT Submission:***



17. TPT strongly supports the application from Draslovka, the manufacturer, seeking an approval to import EDN for use as a fumigant for “in hold” and “on shore” applications on export logs and timber in New Zealand.

***TPT specifically request that the registration takes into consideration:***

18. TPT notes that the final application rate for the control of quarantine insects has not been agreed with China or India. We understand that it is possible that this rate and time will be less than the 150gm/m<sup>3</sup> for 24hrs specified in the application. We understand that STIMBR will be making submissions as to a methodology around the setting and review of appropriate controls to accommodate the potential differing fumigation rates and times. TPT supports this methodology and asks that the Authority adopts this suggestion. Please note however that any controls specified which require fumigations for extended periods greater than 24hrs will have a significant impact on operations. Ideally controls for 16hrs and 24hrs are specified.

19. Recapture of EDN is not required as it is a non-ozone depleting or greenhouse gas. We believe that the very low levels of EDN present under the tarpaulins following fumigation does not warrant/require recapture.

20. EPA approves EDN for both “on shore” and “in hold” fumigations which are critical to providing an alternative fumigant for both China and India vessel phytosanitary requirements.

