Environmental Protection Authority
Te Mana Rauhī Taiao

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

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:	Rodney Ryder [redacted] Allan Laurie. MD
Organisation name (if on behalf of an organisation):	Laurie Forestry Ltd
Postal address:	[redacted]
Telephone number:	[redacted]
Email:	[redacted]

☒ 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. We also may make your submission available in response to a request under the Official Information Act 1982.

☒ I support the application

☐ I oppose the application

☐ I neither support or oppose the application

The reasons for making my submission are[1]: (further information can be appended to your submission, see footnote).

Laurie Forestry (LF) is an independant Forest Management Company providing management and consulting expertise in the wider forestry sector. We provide services from land conversion, forest establishment, silviculure and right through to harvesting and marketing. Through LF harvesting and marketing activities predominantly in the South Island, additional to domestic processor log supply, we export approximately 200,000 JAS per annum of logs to the export markets which is dominated by China and India.

We have 10 direct employees but also employ a range of contractors to undertake work on our behalf. Silviculture contractors, logging contractors, cartage contractors, log marshallers and stevedores with the flow on effect to the wider industries who in turn support them. We estimate there is approximatley an additional 5- 6 people involved in supporting ancillary services for each of those employed by LF.

As a management company we work on behalf of small to medium forest owners who have invested in forestry and are rightfully seeking a return on that investment.

While supplying the export markets we also supply logs to domestic sawmills for processing into lumber/timber products for supply to the domestic market as well export markets.

For log exports, Methyl Bromide is a key phytosanitary fumigant used for exports to both China and India, which we understand these two markets consume approximaltey 75% of New Zealand total log export volume. In both these markets, currently fumigation at the New Zealand end is a biosecurity requirement. LF export market mix is similar to the national average and therefore the use of Methyl Bromide for log export to India and China is important to our business, our clients business and those that work for us.

We are aware of the ERMA review and the now requirement to either find an alterntive to Methyl Bromide for fumigation and or have it recaptured and not released to atmosphere. Finding a solution, to the sector and wider New Zealand community and economy is extremely important. We underatand there has been a lot of work and research conducted by STIMBR and the FOA on the behalf of the sector, which LF supports through the Levy Trust and to date there have been few alternatives identified too Methly Bromide. The current use of Methyl Bromide is not sustainable and recovery is very expensive which would add considerable cost to our business. These costs need to then be passed on to our forest owner clients and thus reducing the return on their investment.

We understand Methyl Bromide is a significant depleeter of the ozone layer contributing to global warming. It is highly toxic and there is evidence that it may have long lasting health problems for those that are over exposed to it over extended periods of time. LF takes both Environmental and Health and Safety issues seriosuly and therefore we support alternatives to improve either.

Although there are other markets that accept logs from New Zealand that don't require fumigation here in New Zealand, they are however proprtionaltely small and not easily accessable for all exporters. For example, both Japan and Korea accept untreated (not fumigated) produce which they then treat at point of discharge, However China and India require treatment either before departure (using Methyl Bromide) or in transit inside the ships hold (using Phosphine). India does not accept Phosphine as a phytosanitary treatment and everything needs to be treated with Methyl Bromide at this point. If Methyl Bromide was no longer acceptable and there is not an exconomic alternative we would likely be excluded from the Indian Market unless agreement between New Zealand and Indian Governing bodies. Methyl bromide fumigation as currently practiced is expensive and if by adding the cost of recapture, the cost is expected to escalate further. These costs come

[1] 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.

directly off the returns to the forest grower. In the international markets, forest products from New Zealand are typically price takers and not price setters as there is strong competition from competing species and supply points.

The long time of treatment using Phosphine precludes its use as a fumigant on shore prior to export

If Phosphine was the only available alternative for the china market it would mean that any deck cargo would need to be debarked or ships only loaded under deck. This would add significant costs to shipping to such markets. We estimate the shipping costs would increase by approxiantly 30% if only able to ship under-deck and fumigate with Phosphine.

Due to its inherant toxicity and public perception around harm, the ports where fumigation can take place using Methyl Bromide have become some what restrictive. To date we understand there are only 3 ports in New Zealand where on-shore fumigation can effectively be carried out. All 3 ports are in the North Island.

The Forest Industry is in great need of a cost effective and environmentally friendly alternative to Methyl Bromide for the treatment of forest products for export.

As importantly for export, MPI and Biosecurity also need an approved alternative fumigant to protect our New Zealand borders from incoming pests.

We summarise Methyl Bromide as follows:

a) Highly toxic

b) Ozone depleting

c) Colorless, odorless, tasteless and absorbed through the skin

d) Cannot be used in conjunction with sulphurous rubber

e) Builds up in the system if over exposed over extended periods

f) No antidote if severly poisoned

g) requires temperatures to be maintained at higher levels to be effective

However we understand that from the excellent work of STIMBR and the FOA etc, that an alternative has finally be found and from pur research and support of STIMBR etc, EDN is the most suitable alternative.

We sumarise EDN as an alternative as follows:

a) It has proven to be effective on a wide range of insect pests as well as being suitable for grain sterilisation and some fungi

b) As a gas it is effective at low temperatures as it disperses and remains effective without a heat source

c) It disperses far quicker than Methyl Bromide and although both are heavier than air EDN is easier to ventilate

d) The specific gravity of EDN means that it produces a greater volume of gas per kg.

e) Smaller molecules give faster and deeper penetration into wood

f) Does not pass as readily through the covers used for fumigation

g) Dilutes rapidly in air

h) As a gas it is only marginally soluble in water so has little or no effect on aquatic life

i) When vented it very quickly achieves extremely low concentrations so birdlife is not affected

j) It naturally degrades in the atmosphere to its core components which are non toxic

k) When used on concrete or ashphalt very little enters the soils

l) Is not bio accumulative and expelled naturally from the body reasonably quickly

j) There is an antidote should someone accidentally get poisoned

k) At 16ppm which is well below the danger level for short term exposure it acts as an irritant which quickly suggests that people who are exposed will become quickly aware that they are not in a good place and leave the area before becoming badly affected.

l) It has a distinct odour which also signals the presence of the gas

m) Current indications are that it can be conducted at a similar cost to the current Methyl Bromide fumigations. Thus it would not significantly reduce the return to the grower.

n) People trained in the use of Methyl Bromide would have little difficulty transferring their skills to the use of EDN

o) Fumigation specialists would be able to use their current equipment to undertake the fumigations using EDN with minimal set up costs.

p) It gets absorbed into timber quickly and would be a far safer option for container fumigations. Venting these requires a far smaller exclusion zone.

q) The application cost is similar to Methyl Bromide and the cost of the chemical under current recommended doses is similar although the dose required has yet to be confirmed and agreed to.

r) Treatment times are similar to Methyl Bromide so should have little affect on current port logistics

Therefore based on all the positive attributes of EDN, we need to start now so that we can start working with trading partners to gain their acceptance providing them the assurance that the fumigant meets their Phytosanitory requirements and therefore a simple transition prior to the 2020 deadline.

By eliminating any disruption during the transition from Methyl Bromide to EDN the flow on effects to the wider community is important and the sooner we gain approval from the EPA for its development and implementation the better.

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.

I wish for the EPA to make the following decision:

The EPA should formally approve the use of EDN as a fumigant for the treatment of forest products for the export market.

The environmental impact of EDN is much less than other alternatives and it is cost effective.

The next step would then be to get its use accepted by our trading partners so that we could not only achieve the 2020 deadline but we may have the opportunity to put it in place far sooner.