



File: FORMAC

9 April 2018

The Chief Executive
Environmental Protection Authority
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Dear Sir/Madam

**SUBMISSION ON APP202804 – IMPORTATION OF ETHANEDINITRILE AS A FUMIGANT FOR USE ON
TIMBER LOGS UNDER COMMERCIAL CONDITIONS**

SUBMISSION ON:	APP202804 To import ethanedinitrile (EDN), a fumigant for use on timber/logs under commercial conditions
APPLICANT	Lucebni Zavody Draslovka a.s. Kolin

NAME OF SUBMITTER:	Crown Forestry, Ministry for Primary Industries
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1. Crown Forestry, a business unit within the Ministry for Primary Industries, administers the Crown's interest in various commercial forestry assets within New Zealand and in respect of the management of these forest assets, markets a significant volume of export logs (presently in excess of 350,000m³ annually) to overseas customers; including customers in China and India.
2. Log exports are a vital ingredient in providing returns to New Zealand forest growers that ensure the industry is both profitable and sustainable.
3. Both China and India currently require logs to be fumigated with methyl bromide prior to cargoes arriving at destination ports. (For India, all cargo must be treated with methyl bromide. For China all on-deck cargo must be treated with methyl bromide; with under-deck cargo currently able to be treated with phosphine).
4. Methyl bromide is an ozone depleting gas. While it is recognised as a very effective fumigant, international conventions require that it must be phased out and replaced with alternatives as they become available. The New Zealand EPA has decreed that methyl bromide use beyond October 2020 must include the use of recapture technologies. The use of methyl bromide at export ports is further regulated under the RMA via Regional Air Plans (discharges to air).

5. Phosphine, whilst not an ozone-depleting gas, is toxic and does have some treatment limitations that mean it can only be used to treat under-deck cargoes during shipment.
6. Although the use of methyl bromide for biosecurity and phytosanitary treatments is permitted by international agreements, these agreements require countries to seek and use alternatives where possible and as they become available.
7. Crown Forestry contributes to the work of a NZ business cluster known as Stakeholders in Methyl Bromide Reduction (STIMBR). STIMBR was incorporated on 8 July 2008, bringing together a wide range of organisations and individuals with a common interest in seeking environmentally and socially acceptable alternatives to methyl bromide, and reducing its use.
8. An extensive review of scientific literature commissioned by STIMBR in 2014 identified EDN as the most promising alternative fumigant to methyl bromide as a phytosanitary control measure. Efficacy test results to date suggest it is an effective phytosanitary treatment for insects associated with New Zealand forest products.
9. Crown Forestry understands that unlike methyl bromide, EDN is not an ozone-depleting gas; and neither is it a greenhouse gas. Moreover, EDN is highly volatile and dilutes more quickly and easily in the environment, degrading to form ammonia and carbon dioxide. We also understand that EDN does not remain as a residue in the environment nor does it accumulate in the soil or in plants and animals.
10. Draslovka's application to the New Zealand EPA indicates that EDN can be used for fumigation where average daily temperatures fall below 10°C (the limit for methyl bromide) and that EDN also controls a range of fungi, phytophthora and nematodes. The ability to treat at lower temperatures than is currently possible for methyl bromide and have wide-ranging efficacy in respect of pests and pathogenic organisms is of significant value to the entire NZ forest industry.
11. Crown Forestry considers the approval of this application as a critical step in being able to test EDN as a viable alternative fumigant to methyl bromide. (Later steps will involve gaining overseas trading partner approval but the testing to demonstrate its efficacy for phytosanitary treatment of logs in a commercial setting in New Zealand cannot commence until it can be imported for this use)..
12. Crown Forestry strongly supports the application from Draslovka, the manufacturer seeking an approval to import EDN for use on logs and timber in New Zealand, as absolutely essential for an industry which currently relies heavily on the use of methyl bromide.



Warwick Foran
General Manager Crown Forestry, Ministry for Primary Industries