

**From:** John Armstrong <jack@quarantinescientific.com>  
**Sent:** Friday, 8 March 2019 2:40 PM  
**To:** EDN  
**Subject:** RE: APP202804 EDN Submission

To the New Zealand Environmental Protection Authority and the Ethanedinitrile (EDN) Submission Decision Making Committee (DMC):

I have been closely associated with the research on the use of EDN by the Crown Institute for Plant and Food Research (PFR) to provide research and scientific oversight based on quarantine treatments and fumigation expertise acquired from a 40-year career with the United States Department of Agriculture's Agriculture Research Service. In my consulting capacity, I am also closely associated with the Stakeholders in Methyl Bromide Reduction (STIMBR) and the New Zealand forestry industry.

The EDN research data sets accumulated to date by PFR, includes toxicity to target insects, penetration characteristics, confirmatory testing under commercial conditions, along with supplementary data being collected by others covering worker exposure measurements and air quality sampling in the field. This work has been supported by the STIMBR and Draslovka. The research has clearly shown that EDN is a suitable replacement for methyl bromide and can be safely used for the phytosanitary treatment of logs exported from New Zealand. Moreover, the research generated in PFR and resulting data sets are important steps toward the approval by EPA for the use of EDN in New Zealand.

I attended the two EPA hearings (giving testimony at the second hearing) that were held during the last two weeks of August 2018, a year after the applicant, Draslovka, submitted their EDN application in July 2017. We are now six months beyond the EDN hearings and yet have no decision from the DMC except to request more information. Other regulatory bodies (for example the AVPMA in Australia and the US Environmental Protection Agency) have responded quickly to EDN applications with direct requests to the applicant requesting the information required for their approval process. Such requests have clearly articulated the data sets required and methods by which the data should be produced.

The forest export industry, currently valued at over \$6 billion, has funded research for the last 9 years in the hope that it will have a replacement for methyl bromide in October 2020. The current NZ EPA approval process is now 20 months beyond the initial application submission by Draslovka with no indication when that process will be completed. EPA approval does not mean that EDN will be able to be used immediately in a commercial setting. WorkSafe regulation is needed and at some ports the Regional Council will need to grant a resource consent. I respectfully request that the DMC complete their assessment and make a decision in a timely manner so that there is a credible possibility that EDN will be available to replace methyl bromide by October 2020.

Thank you for your time and consideration in this matter,

Jack

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