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EPA

Matariki Forests (MF) managed by Rayonier NZ Ltd (RNZ) is a large forest owner, ~120,000 Ha and a significant supplier of logs to both the NZ domestic market, ~1.2 million m<sup>3</sup> p.a. and export ~1.0 million m<sup>3</sup> p.a.

We have become increasingly concerned at the delays in process of approving EDN as an alternative to methyl bromide fumigant, particularly given the fast looming October 2020 deadline to cease use of MB or fully recapture MB.

The consequences to MF and its export customers of not having an alternative fumigant to MB before the October 2020 deadline are major and will involve completely exiting from the Indian market place. This will mean log exports to this key market which compliments both the NZ domestic log market and other export markets like China and Korea will be lost. This will have a direct negative financial impact on MF and will also have a longer term adverse impact on forestry in NZ in general as more logs will inevitably be left on the cutover or forced into markets that do not value these products in the same way Indian customers do.

It is clear EDN is the best fumigant to replace MB as shown by recent commercial scale trials which demonstrated 100% kill rates of NZ pine insects and less than 1% of chemical remaining after 24 hours.

It is critical to the viability of NZs forest industry approval for the use of EDN be given without any further delay. As we envisage a significant lead up period will be required to get agreement from NZs trading partners for the substitution of MB fumigation with EDN fumigation.

We strongly request EPA takes all necessary steps to expedite the approval of the use of EDN.

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