

SUBMISSION FORM

For Hazardous Substance and New Organism Applications

Once you have completed this formSend by post to: **Environmental Protection Authority**, Private Bag 63002, Wellington 6140OR 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 - EDN
Name of submitter or contact for joint submission:	Philip James Taylor
Organisation name (if on behalf of an organisation):	Port Blakely Ltd
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 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 are¹: (further information can be appended to your submission, see footnote).

Having and environmentally sensitive and cost-effective replacement fumigant for Methyl Bromide for the treatment of logs and lumber for export from NZ is critical to the long-term sustainability of Port Blakely's operations in New Zealand.

Port Blakely owns approximately 30,000ha of plantation forest in New Zealand. The company employs approximately 250 people across a wide range of operations either as employees or contractors. In addition, a significant number of people and businesses are supported indirectly by Port Blakely operations. Port Blakely contributes significantly to the communities in which it operates and in maintaining and enhancing habitat for protected and endangered species. Port Blakely requires a profitable and sustainable business with efficient and effective supply chains to market if it is to continue to provide these benefits to New Zealand and EDN as a replacement for Methyl Bromide will be an important part of achieving this.

In 2017 the company harvested and marketed over 600,000m³ of saw logs. Of this volume approximately 91% was exported in log form to Asia. This high percentage of export is not through choice it is through necessity due to a lack of domestic processing in the regions in which Port Blakely operates. For most of Port Blakely's production, it has no choice other than to export forest produce as logs to Asian markets and having an approved fumigant is critical for the company's business.

Most of Port Blakely's harvest production is centered in South Canterbury and North Otago, a region that has limited domestic processing capacity. Unlike other regions, South Canterbury and North Otago rely almost totally on having an efficient supply chain into the export market. This supply chain includes the ability to fumigate logs to meet importing country biosecurity standards.

All the markets that Port Blakely exports to have strict biosecurity controls requiring fumigation of some form or other.

Due to the high proportion of logs exported, the phase out of Methyl Bromide by 2020 represents a significant threat to the long-term viability of Port Blakely business in New Zealand unless a replacement fumigant can be found and approved for use.

Port Blakely supports the registration and subsequent use of EDN as a fumigant because it:

- provides a cost-effective and environmentally acceptable alternative to Methyl Bromide
- has the potential to support the continued export of logs and lumber into a range of markets
- does not harm the ozone layer nor is it a greenhouse gas
- does not bio-accumulate (i.e. build up overtime in animal bodies)

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.

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- breaks down rapidly in the environment without leaving harmful residues
 - degrades in water, sediment and soils to form ammonia, carbon monoxide and carbon dioxide

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:

Approve the importation and use of EDN in New Zealand for the purpose of log and sawn lumber fumigation
