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To: EDN
Cc: Taylor, Phil
Subject: Port Blakely - APP202804 EDN Submission

Follow Up Flag: Follow up
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To whom it may concern.

Port Blakely respectfully submits the following in relation to application APP202804 Registration of EDN.

Due to a lack of domestic processing capacity within the majority of the regions in which Port Blakely operates the only short term option [5-10 years] is to export over 90% of our annual harvest in log form.

Port Blakely currently exports to the main markets of China, Korea and India. The bulk of this volume [>80%] is exported to markets which require fumigation. All of Port Blakely's "deck cargo" is currently fumigated using Methyl Bromide.

Port Blakely recognizes the importance of phasing out Methyl Bromide by October 2020 and it has been actively involved working with STIMBR to find an acceptable replacement.

Fumigation is, and will remain for the foreseeable future, a crucial tool in the toolbox required to manage our export customers phytosanitary requirements.

Debarking is not available or practicable for the main ports from which Port Blakely operates [Dunedin and Timaru] and we rely heavily on the ability to fumigate deck cargo at North Port and Tauranga. Joule heating technologies are a long way off commercialization.

EDN is a promising alternative to methyl bromide and application for registration to the EPA was made in July 2017 seeking approval to enable its use in New Zealand.

With the rapidly approaching deadline of October 2020 for the phase out of Methyl Bromide and the significant amount of work required post registration/approval of EDN by the EPA Port Blakely is becoming increasingly concerned and frustrated at the on-going delay in a decision not being made. The consequences of not having a replacement for Methyl Bromide approved by October 2020 are very significant for our business and for the forest industry as a whole.

While Port Blakely appreciates the DMC's desire to have more information since EDN is a new fumigant it is imperative that the process of obtaining this information, and the subsequent decision making process, is completed with all due haste.

Port Blakely encourages the DMC to provide a decision as soon as it has the information so the Industry can be ready for October 2020 with a replacement for methyl bromide

Philip Taylor

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