

SUBMISSION FORM

For Hazardous Substance and New Organism Applications

Once you have completed this form**Send by post to:** Environmental Protection Authority, Private Bag 63002, Wellington 6140**OR 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:	Geoff Thorp
Organisation name (if on behalf of an organisation):	Lake Taupō Forest Management Ltd
Postal address:	PO Box 102 TURANGI 3353
Telephone number:	07 3868839
Email:	geoff@lfft.co.nz

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).

Lake Taupo Forest Management Ltd (LTFM) is a subsidiary of the Lake Taupo and Lake Rotoaira Forest Trusts. These Trusts administer around 50,000 ha of land in the Taupo region, on which there is around 32,000 ha of plantation forests. The lands are administered by the Trusts on behalf of 13,000 and 12,000 Maori landowners respectively, having been established in the late 1960s and early 1970s. The Trusts entered into forestry leases with the Crown (currently represented by Crown Forestry Ltd under MPI), but these leases are coming to an end in 2021 and 2026 respectively.

Our forests employ over 200 people, nearly half of whom are either owners in our lands or are descendants of owners in our lands. The forests have reached their long-term sustainable harvest level of around 700,000 m³/year of logs, generating sales of over \$70 million annually. The two forest trusts are investing around \$7 million/year into growing and managing the next rotation of trees, and this investment is the core business we undertake on behalf of our many owners.

The Trusts and our partner the Crown take a careful approach to marketing our logs, and while we do concentrate on domestic markets, around 30 - 35% of the wood we produce is exported in log form.

Exporting logs is important to our business and although China is not our sole export customer, the potential future use of ethanedinitrile (EDN) for phytosanitary treatment of logs sold into both the India and China markets would be invaluable. While we support domestic processing, we would be very concerned about how we would sell our full production level if we were unable to continue exporting due to phytosanitary concerns. This would have a significant negative impact on our business, and on the distributions we make to our thousands of owners.

Our forests are certified by the Forest Stewardship Council, under a certificate held by our contracted manager NZ Forest Managers Ltd. This FSC certificate requires NZFM to minimise the amount of highly hazardous chemicals used within the forest. Being a FSC certificate holder also requires that we continually look for alternatives to highly hazardous chemicals used in all facets of the forest industry, be they alternative treatment methods for the forest crop or less hazardous chemical fumigants such as EDN.

As a signatory to the United Nations' Montreal Protocol on Substances that Deplete the Ozone Layer (1989) and the Vienna Convention for the Protection of the Ozone Layer (1988), which are both committed to stopping depletion of the ozone layer, New Zealand has committed to no methyl bromide emissions beyond 2020. Despite the research into alternatives that has been undertaken since 2010 there has only been one practical alternative fumigant identified to date, this is EDN. The fact that EDN is the only practical option available makes it vitally important for the export of forest products from New Zealand.

As a medium-sized plantation forest owner who exports around 200,000 m³/year of logs, LTFM strongly supports the approval of EDN as an alternative fumigant in NZ, as we consider it will be essential to our ability to market exotic plantation

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.

logs to India and China, which currently rely on the use of methyl bromide or phosphine for phytosanitary treatment.

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 import and release of ethanedinitrile (EDN) in New Zealand.
