

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:	Ian Shapland
Organisation name (if on behalf of an organisation):	NZ Forest Managers Ltd
Postal address:	██████████ ██████████
Telephone number:	██████████
Email:	██████████

 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).

NZ Forest Managers Ltd (NZFM) is a privately owned company established in 1989. We are a specialised contract forest management organisation that provides commercial forest owners with a comprehensive management service covering the full range of operations from forest development, protection and investment through to harvesting and marketing. NZFM is located in Turangi and employs approximately 25 salaried staff and has a total workforce of up to 300 people across all forest activities.

NZFM manages approximately 56,000 hectares of exotic plantation forest. We undertake the commercial harvest and marketing of up to 1 million m³ of logs per annum, realising around \$100 M NZD in revenue for our clients. One third of the harvested volume is exported, while the remaining two thirds is sold to domestic customers.

NZFM trades in forest produce on the client's behalf only and as a manager of long term investments it is our responsibility to maximise the financial returns for our clients. 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.

The majority of the forests managed by NZFM are certified by the Forest Stewardship Council. The NZFM FSC certificate requires us as a forest manager to be minimising the amount of highly hazardous chemicals used within the forest. Being a FSC certificate holder also means that we are always looking 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 an independent manager exporting forest products on behalf of its clients, NZFM considers the approval of EDN as an alternative fumigant in NZ essential to the ability to market exotic plantation 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.

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.

I wish for the EPA to make the following decision:

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