



# 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](mailto: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.**

<b>Submission on application number:</b>	APP202804 - EDN
<b>Name of submitter or contact for joint submission:</b>	Tim Charleson
<b>Organisation name (if on behalf of an organisation):</b>	Red Stag Timber Ltd
<b>Postal address:</b>	PO Box 1748 Rotorua 3073
<b>Telephone number:</b>	07 3495803
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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](http://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 are<sup>1</sup>: (further information can be appended to your submission, see footnote).**

Red Stag Timber is the biggest sawmill in the southern hemisphere and is the biggest private employer in Rotorua with about 300 full-time staff and 50 on-site contractors. Annual company turnover is approximately \$200 million.

Red Stag Timber is reliant on the use of methyl bromide for fumigating timber in order to access some overseas markets. Without these markets the business profitability will be diminished.

Methyl bromide is a persistent organic pollutant (POP) and its use is internationally outlawed with the exception for fumigation where there is no effective alternative. This is because at the time of the ban there was no other viable alternative to methyl bromide as a fumigant and its removal would cause significant hardship to agriculture and trade between countries with biosecurity borders.

There is a compelling reason to discontinue the use of methyl bromide given its adverse impact on the atmosphere.

The EDN application documents that EDN :

1. Is an effective fumigant capable of replacing methyl bromide
2. Is not a POP
3. Has no global warming potential
4. Is relatively safe to handle
5. It doesn't bioaccumulate
6. It readily breaks down in the environment to harmless residues

The Australian authorities have recently approved its use in that country (for soil fumigation) which supports the case for the same outcome in NZ.

Red Stag Timber currently processes about 950,000 m<sup>3</sup> of logs into about 550,000 m<sup>3</sup> of saleable timber. Of this volume, approximately 35% is exported overseas. Some of the importing countries phytosanitary rules require that the timber be treated with methyl bromide. Approximately 20,000 m<sup>3</sup> required methyl bromide fumigation in the last 12 months. Without this treatment market access to these countries would not be possible. The economics of these markets will be diminished after 2020 once EPA mandated MeBr recapture is fully implemented because of the additional cost involved (possibly double) in doing this.

There is also the ongoing risk that other countries may require MeBr fumigation in the future which reinforces the case to substitute its use with EDN as soon as possible.

EPA approval of EDN will result in a phase out of MeBr once approval from trading partners is agreed to. This will result in a sustainable and environmentally responsible way forward in meeting phytosanitary requirements.

Red Stag Timber supports the STIMBR application.

<sup>1</sup> 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.

**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.**

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**I wish for the EPA to make the following decision:**

To approve the use of EDN for fumigation purposes in NZ

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