

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
Name of submitter or contact for joint submission:	Paul Jensen
Organisation name (if on behalf of an organisation):	Total Harvest Solutions (THS)
Postal address:	<p>██████████</p> <p>████</p> <p>██████████</p> <p>██████████</p>
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).

TOTAL HARVEST SOLUTIONS (THS) is an independently owned company providing a range of forestry related services to forest owners and contractors alike. The key aspect of advice is around efficient plantation forest management practices, in particular harvesting, transport and marketing. THS supports the application from Draslovka, seeking an approval to import EDN for use as a fumigant for "in hold" and "on shore" applications on export logs and timber in New Zealand. The industry needs an alternative to Methyl bromide for log fumigation and EDN appears the most suitable. If there is not full recapture and or an alternative to methyl bromide in place before October 2020 log exports will be severely and negatively impacted and therefore impacting Forest Owners, Sector related Businesses and vast Kiwi jobs in the industry alike.

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:

Approval to import ethanedinitrile (EDN), as a timber/log fumigant under commercial conditions

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.



**TOTAL HARVEST
SOLUTIONS LTD**



TOTAL HARVEST SOLUTIONS (THS) Submission to the Environmental Protection Authority

Email: EDN@epa.govt.nz

THS is in SUPPORT of the application to import EDN APP202804, as a fumigant for use on timber/logs under commercial conditions.

Executive summary

THS supports the application from Draslovka, seeking an approval to import EDN for use as a fumigant for “in hold” and “on shore” applications on export logs and timber in New Zealand. The industry needs an alternative to Methyl bromide for log fumigation and EDN appears the most suitable.

An introduction to the THS submission

- **TOTAL HARVEST SOLUTIONS (THS)** is an independently owned company providing a range of forestry related services to forest owners and contractors alike. The key aspect of advice is around efficient plantation forest management practices, in particular harvesting, transport and marketing.
 - THS employ a number of harvesting and trucking contractors whom the export business is critical to their business and employment. There are a range of support jobs attached to the wider industry and so its not just those employed directly in the operations, it’s the support jobs as well that rely on the export log business.
- THS exports approximately 200,000 JAS of export logs from the Nelson Port, to the dominant market of China, with secondary market being Korea. Our total sales revenue is approximately US\$28,000,000 (NZ\$40,000,000).
- Approximately 98% of THS volume requires phytosanitary fumigation treatment before leaving NZ waters. As Nelson doesn’t accept ‘on port’ fumigation with methyl bromide, 100% of THS volume destined for China is loaded under-deck on the vessel and taken to another port to complete loading. Therefore 100% of THS volume is treated with Phosphine when destined for China.

- Although 100% of THS volume is Phosphine treated, which is common for a number of other exporters, there is a very real understanding by THS for the need to have an alternative to methyl bromide for the THS business and wider NZ forestry sector.
- THS recognize the previous ERMA 2010 review and the now EPA requirement that methyl bromide be phased out or recaptured by October 2020. THS support good Environmental and Health and Safety practices and therefore support the introduction of EDN in this regard.
- THS indirectly contracts Marshalling, Stevedoring and Fumigation services to undertake the log receipt, storage, inventory management fumigation and vessel loading activities enabling our logs to be exported to the destination markets.
- Debarking is not considered a robust alternative to fumigation for THS due to scale at Nelson and the grade mix THS produces e.g. many grades and rough and short and therefore not suitable for debarking.

If no alternative to Methyl Bromide

- THS is concerned that an alternative to methyl bromide is not identified and used in the future for phytosanitary treatment of log export. THS requires other ports to continue to be able to fumigate 'on port' for the vessel deck cargo, and or if EDN is accepted by the EPA, Nelson Port may accept EDN for 'on port' fumigation as an alternative to methyl bromide in the future which is currently not accepted. If other ports are unable to fumigate deck cargo, the supply chain costs will increase significantly impacting return to Nelson based forest owners.
- As THS supply local domestic sawmills and pulp mills as well, there would a direct supply impact on them as THS see export logs complementing domestic markets/customers and if unable to export economically (due to fumigation costs increasing or worse still unable to export at all) would put the total harvest level at risk and therefore supply to domestic mills as well.

'EDN' as an alternative

- Through STIMBR and FOA there has been a significant review of scientific literature whereby 'ethanedinitrile' (EDN) was identified as the most promising alternative fumigant to methyl bromide. Draslovka, has applied to the EPA for approval to register and import 'ethanedinitrile' (EDN) into New Zealand as an alternative to methyl bromide and they have invested heavily on research.

- THS understanding from reading the literature and consulting with other industry parties, it appears EDN (subject to EPA approval) provides a cost-effective and environmentally acceptable alternative to Methyl bromide – and at this stage appears the only alternative.
- THS understand that EDN is non-ozone-depleting nor is it considered a greenhouse gas. However, it's highly volatile, but breaks down rapidly and dilutes more quickly and easily in the environment degrading to a form of ammonia and carbon dioxide. It also doesn't remain as a residue in the environment nor does it accumulate in either the soil, or in plants or animals.