

APP202804 ETHANEDINTRILE (EDN) A SUBMISSION IN RESPONSE to DMC Direction and minute WGT11 from Red Stag Timber.

Red Stag Timber is the largest sawmill in NZ and employs over 300 full-time staff and 50 contractors. Production is about 500,000 m³ p.a of sawn lumber.

Up to about 50% of production is exported at times to over 13 countries. Whilst not all exports currently require fumigation there is the potential in the future that our trading partners may tighten their phytosanitary regulations requiring fumigation.

We support the move to replace methyl bromide with EDN given the minimal environmental impact EDN has compared to methyl bromide.

It is essential that this export trade is not threatened due to the inability to fumigate in the event that methyl bromide treatment becomes non-viable or is banned.

The approved use of EDN with realistic and reasonable controls to protect workers will address this concern and is the only realistic and sustainable option.

The DMC Direction and minute WGT11 invites all parties to the process to provide any responses to the new information received from the applicant, Draslovka on 26 March and posted on the EPA website.

Having read this document, I consider it to be a comprehensive high quality technical response to the DMC Direction WGTO10 and addresses all the issues raised. Red Stag Timber unreservedly supports the Draslovka response and urges the DMC to adopt the conditions and limits proposed which are shown to be scientifically defensible.

We likewise fully support the STIMBR response to WGT11 which brings together both the latest Draslovka information and the NZ forest industry funded EDN research to show that EDN is the logical replacement for methyl bromide.

Items of particular note for the DMC to consider include:

- The application to include EDN use in containers as well as log stacks and ship holds. Timber is exported in containers (as are logs at times) as well as break-bulk (fumigated under tarps) and hence it is important that containers are included in the scope of use.
- New Zealand needs EDN as it is the only viable and sustainable alternative to methyl bromide for treating a significant portion of our exported forest products (logs and timber).
- The modelling prepared by Sullivan Environmental demonstrates that EDN can be used safely with reasonable controls and does not support buffers greater than those currently needed for methyl bromide. The EPA proposed buffer limits are too conservative and are driven by an unrealistic percentile factor used.
- A review the TEL proposed by the EPA (0.036ppm) is significantly more conservative than the TEL of 0.2ppm recommended by two world expert regulatory toxicologists and hence cannot be justified.