

TPT Forests Submission to the Environmental Protection Authority

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TPT Forests Limited



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APP202804 ETHANEDINTRILE (EDN) TPT Forests submission in response to DMC Direction and minute WGT11. – 4<sup>th</sup> May 2020.

**Background:**

1. TPT manage the export operations, shipping, and sales on behalf of 14 different clients (Forest Owners and Managers) across New Zealand.
2. TPT directly contracts Marshalling, Stevedoring and Fumigation services, as well Port Companies to undertake the wharf log receipt, storage, materials handling, fumigation, and vessel loading activities enabling logs to be exported to the destination markets.
3. TPT's export trading partners (China, India, Korea, Japan) determine what phytosanitary (fumigation) treatments are required for logs exported from New Zealand to their countries. The Importing Country Phytosanitary Requirements (ICPR) of both China and India require "on shore" fumigation treatment (in the Country of Origin) with Methyl bromide. While China does accept the use of Phosphine for a portion of the vessel being loaded ("in hold" portion), India however does not and therefore Methyl bromide is the sole approved treatment for log supply to India. Japan and Korea who currently fumigate on arrival with Methyl bromide may require treatment in the Country of Origin in the future.
4. TPT recognise the previous ERMA review and the now EPA requirement that Methyl bromide be phased out or recaptured by October 2020. TPT support good Environmental and Health and Safety practices and therefore have and continue to work with STIMBR and FOA to meet such requirements.
5. TPT are extremely concerned that Methyl bromide will no longer be available for use as a phytosanitary treatment for export logs post October 2020 due to the unachievable recapture requirements, and with no alternatives available will have a significant negative impact on the commercial viability of the total log export program recovering from the impact of Covid-19.



6. An internationally acknowledged review of scientific literature commissioned by Stakeholders in Methyl Bromide Reduction (STIMBR) identified 'ethanedinitrile' (EDN) as the most promising alternative fumigant to Methyl bromide as a phytosanitary control measure having the potential to support the continued export of logs and lumber to a range of markets.

7. TPT recognise the importance of measures and additional controls to protect public and port workers at the fumigation sites with the introduction of a new fumigant. These controls need to be based on scientific evidence and for on port workers operationally managed using a risk-based management approach.

***TPT Submission:***

8. TPT supports the submission from STIMBR in response to the DMC Direction and minute WGT11.



Director

