



20 September 2021

Dr John Taylor
Chairperson Decision-making Committee
EDN@epa.govt.nz

Dear Dr John Taylor

MPI welcomes progress in the registration process for ethanedinitrile (EDN) which has the potential to replace over 90% of the current methyl bromide use (673 tonnes in 2019). Registration will greatly assist in negotiations with our trading partners to move their importing requirements to alternative treatments, such as EDN. It will also validate the large body of research undertaken here in New Zealand confirming the efficacy of EDN as a phytosanitary treatment.

MPI notes the proposed controls in the updated science memorandum states: "The substance can only be used for timber treatment fumigation under a sheet or in a shipping container".

In 7.22 of the staff report it states: *The EPA suggests the addition of controls that ensure that EDN is used in accordance with the requirements of the draft SWI (s) generated by WorkSafe, namely:*

- A maximum application rate of 120 g/m³ over 24 hours
- The substance can only be used for timber treatment fumigation under a sheet or in a shipping container

However, the Staff Report has: *"Use restriction: This substance must only be used as a fumigant for timber **and logs** for **export** under a sheet or in a shipping container."*

MPI recommends that the use of EDN is not restricted to exports and not restricted to timber and can be applied to fumigation of all timber and logs in New Zealand for both exports and imports. This will support MPI's objective to support the replacement of methyl bromide with other effective and acceptable phytosanitary treatments.

MPI is concerned that ship hold fumigation with EDN is not permitted as a replacement fumigation treatment for ship holds which is needed. This is particularly needed for the India log trade as the current methyl bromide controls will prevent this significantly valued trade continuing. MPI would like to see scientific trials allowed to investigate that the same parameters can be achieved in ship holds in comparison to under cover fumigations along with investigating EDN for use across a range of commodities.

The buffer zones proposed seem feasible and the pre-venting gas levels will only be confirmed over time as to how easily they are achieved. However, MPI would like to reiterate that a suitable buffer zone size should be related to the size of the fumigation being conducted. That is, a large log fumigation can encompass 1,200 m³, whereas an export timber fumigation may be limited to 100 m³ or a container is only 32 m³.



MPI recommends that buffer zones are more clearly set in a size graduation similar to the methyl bromide reassessment controls as follows:

2) For fumigation of containers of up to 77 m³ in volume the PCBU must set a buffer zone for each fumigation that is equal to or more than 10 m.

(3) For fumigation of containers equal to or greater than 77 m³ in volume the PCBU must set a buffer zone for each fumigation that is equal to or more than 25 m.

Proposed EDN control: The buffer zone for unprotected workers should be set as 20 metres and the buffer zone for the public should be set 30 metres (with an endpoint concentration of 700 ppm).

MPI proposes modified control zone distances for EDN as follows: The buffer zone for unprotected workers should be at 10 metres and the buffer zone for the public should be set 25 metres (with an endpoint concentration of 700 ppm) for fumigations of less than 225 m³.

This is based on the Todoroski Report finding that indicates the predicted 24-hour average levels with an endpoint concentration of 1,000 ppm occurring in all hours would be below the relevant criteria at a 50-metre distance for one log stack of 450 m³. It is logical that half the stack size would only need half the buffer zone distance.

MPI looks forward to registration of EDN to enable the next steps to occur in replacing methyl bromide for quarantine, pre-shipment and possibly other purposes.

Regards

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