



17 September 2022

New Zealand Environmental Protection Agency
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Wellington

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APP202804: APPLICATION FOR APPROVAL TO IMPORT EDN FOR RELEASE

Subject

The New Zealand Forest Owners Association (FOA) response to the DMC's invitation for comment on the updated EPA Staff Report 2021 and the updated EPA Science Memorandum 2021.

Introduction

We welcome the opportunity to provide comments on the EPA's updated EPA Staff Report 2021 and the updated EPA Science Memorandum 2021.

The New Zealand Forest Owners Association Incorporated (FOA) is the representative membership body for the commercial scale plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 75% of the annual harvest.

In 2020, the total value of forestry exports was worth \$5.65 billion, of which \$3.07 billion was for exported logs. The forestry sector also supports employment, investment, and development across New Zealand throughout its supply chain in both urban and rural New Zealand.

Phytosanitary Treatments

The international trade in logs and wood products (as well as horticultural products and other commodities) relies on the availability of effective and internationally accepted phytosanitary treatments to mitigate the global spread of biosecurity threats.

Importing countries stipulate phytosanitary treatment(s) that are acceptable to them to protect their environment, economy, and people from the risk of imported pests in the same way New Zealand does to protect itself from biosecurity threats.

The availability of effective phytosanitary treatments is therefore critical for ensuring, maintaining, and protecting the ongoing international trade in wood and wood products from New Zealand and for mitigating and preventing the introduction of biosecurity threats.

Industry activity

The forestry growing industry recognises and acknowledges that New Zealand's log and timber exporters need alternatives to methyl bromide to enable a transition away from this environmentally harmful gas. It has also

committed to doing so if there is an efficacious and cost-effective alternative treatment available that is accepted by our trading partners.

To this end Stakeholders in Methyl Bromide Reduction (STIMBR) has been working with the industry, Crown Research Institutes (CRIs) and government agencies for over 10 years to identify and explore the suitability of alternative chemical and physical phytosanitary treatments to enable a reduction in Methyl bromide use and therefore emissions.

Forest industry stakeholders with co-funding from government and other agencies have collectively invested over \$26 million into this work to date. In addition to finding a viable and superior alternative to Methyl bromide, ethanedinitrile (EDN) a more environmentally sustainable alternative, it has also generated and collated a significant body of scientific, technical, and expert evidence to support and inform evidence and science based decision making.

Comments

The FOA welcomes the release of the EPA's updated Staff Report and Science Memo (August 2021) and would like to acknowledge the consideration that the EPA staff have given to this application and the associated body of technical evidence and advice in its' evaluation and recommendations reflected within these documents.

The FOA also welcomes and fully supports the EPA's recommendation to approve EDN for import and or manufacture and its subsequent application in line with the draft SafeWork Instruments (SWI) (prepared by Worksafe) and the EPA's proposed additional controls.

In addition to mitigating any potential risks associated with the application of EDN as a phytosanitary treatment for wood and wood products, the SWI's and the EPA's recommended controls provide for safe yet workable and operationally practical controls.

The release of these documents and the associated recommendations has provided the forest growing industry with improved confidence that a more environmentally sustainable and effective alternative phytosanitary treatment may become available in New Zealand to enable the export industry to be able to transition away from Methyl bromide.

The FOA, however, must again express its frustration and disappointment at the extensive length of time that it has taken the EPA to consider this application to date.

This delay was a significant contributor toward STIMBR having to apply for a reassessment for Methyl bromide to find workable controls that allowed for the temporary extended yet safe use of Methyl bromide as the only cost effective phytosanitary treatment available for the volume of logs exported, and that was acceptable to trading partners, while EDN was still "being considered" by the EPA.

Capital investment decisions for both physical and chemical alternatives were hampered by the application effectively being "in-limbo" and the uncertainty that this created. While some larger companies took the risk in making investments in alternatives not all companies had the ability, infrastructure, or integration to carry this risk and make such a significant investment in the face of this uncertainty.

This delay has also had a significantly negative impact on the industry's social licence as it has had to pursue options for, and defend the continued use of, methyl bromide as its only available phytosanitary treatment option, all while this application remained under consideration by the EPA over this extended period.

The recent EPA decision on the modified reassessment of methyl bromide was welcomed by the forest growing industry as it has provided the industry with greater certainty while also providing a clear and structured transition pathway away from, or more effective recapture of, methyl bromide. We note, however, that the

decision means that New Zealand loses access to the Indian market until an alternative to methyl bromide is in place.

It has also reemphasised the importance of a timely decision by the DMC on EDN to allow the industry to be able to make this transition away from using methyl bromide toward a more environmentally sustainable alternative.

The FOA requests that the EPA progress this application as efficiently as it can to minimise the disruption and impacts that will arise in the absence of an effective alternative to methyl bromide.

If you have any queries in relation to these comments, please contact me at brendan.gould@nzfoa.org.nz or 027 3641577.

Yours sincerely

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Forest Owners Association