



## **APP202804 ETHANEDINTRILE (EDN)**

### **Submission: Stakeholders in Methyl Bromide Reduction (STIMBR)**

20 September 2021

The Stakeholders in Methyl Bromide Reduction (STIMBR) welcomes the release in August 2021 of the EPA's updated EPA Staff Report 2021 and the updated EPA Science Memorandum 2021. The Safe Work Instrument (SWI) prepared by Work Safe approved in principle by the Minister for Workplace Relations and Safety has also been considered by the EPA staff informing their recommendations to the Decision-Making Committee (DMC). The EPA documents provide analyses and recommend controls that if adopted by the DMC will enable the use of EDN as a viable alternative fumigant to methyl bromide.

STIMBR notes and applauds the extensive analysis and careful consideration that the EPA and Worksafe staff have given to the application seeking approval for the manufacture and use of EDN in New Zealand. The EPA's acceptance of the use requirements developed by Work Safe to reduce risks to workers will be adequate to minimise risk to the environment are supported by STIMBR.

Over the last decade STIMBR has explored many possible potential alternative chemical and physical treatments that would allow a planned transition away from methyl Bromide. Systems approaches have also been investigated. Many of these alternatives have been shown unable to achieve the phytosanitary standards required by both MPI as the signatory on phytosanitary certificates and the needs of our trading partners.

Industry stakeholders with co-funding from government and other agencies have collectively invested over \$40 million into this work to date. The greatest share of this spend has been spent on suitable alternative treatments for use on forest products, significantly logs thereby reducing reliance on methyl .

We note that EDN is now registered and is being used in South Korea, Malaysia , Russia and Australia. EDN is also being used for biosecurity purposes to treat logs in a biosecurity response in the Czech Republic while plans are underway to extend its use to Belgium, Germany and the Netherlands for 2022 as part of the same biosecurity response. Registration is underway in the USA (full registration on track for 2022), Canada, Chile, Egypt, EU, India, Indonesia, Israel, Philippines and South Africa.

The recent reassessment of methyl bromide requires progressively higher standards for the recapture of methyl bromide from log stack fumigations. The use of methyl bromide to treat ship-holds is effectively banned. Fumigation service providers will need to either achieve the standards required for methyl bromide use and / or transition to alternative treatments in the coming years. It is hoped this will allow sufficient time for the necessary domestic and trading partner approvals needed for the use of EDN to treat forest products. However, until such time as an alternative treatment is available to treat ship-holds the Indian market will not be able to be serviced.

STIMBR encourages the DMC to adopt the recommendations made by the EPA in the staff report. In doing so we ask that the DMC conveys a message in its decision to territorial and unitary authorities reinforcing the rigour that has gone into the process to determine the SWI requirements and the controls it determines. No greater controls should nor need to be imposed through the Resource Management Act consenting processes ensuring that one set of rules applies across the country.

STIMBR further encourages the DMC to bring forward a decision with urgency, now that use of methyl bromide has been severely curtailed.

Turning to the matter of ship holds. We accept that ship-hold fumigations were removed from the application by the EPA as there was insufficient information on which to base a decision to support the preparation of a SWI and for the DMC to make an informed decision. STIMBR understands that Draslovka is collecting data on ship hold use of EDN that will inform a decision on the treatment of ships. We also understand that Work Safe is willing to prepare a SWI when the ship hold data is made available. Without a treatment for ship-holds the logs export industry cannot supply logs to India. In order to avoid delays in the future, STIMBR asks that the DMC include provision in its decision that allows for the use of EDN to treat ship holds conditional on ministerial approval of a SWI.

There is one other concern that we ask is addressed. That is the recommended controls under the "Use restrictions" states EDN ".....*must only be used as a fumigant for timber and logs for export under a sheet and in containers..*". While the focus is on forest products being exported EDN should also be available as a treatment to treat incoming forest products at the border.

