



**To:** Environmental Protection Authority

**Date:** 12<sup>th</sup> April 2018

**Northport Ltd submission on EDN (APP202804)**

Northport Ltd owns and operates the Port Facility at Marsden Point. Over a dozen companies export logs through Northport, predominantly to China and India. These logs - around 2.8 million JASm3 in 2017 - require fumigation to meet the importing countries phytosanitary requirements. A smaller volume of other cargoes are also fumigated when required, to meet either import or export requirements, but logs are currently by far the largest volume of cargo at the Facility.

Northport and other companies working at the facility employ just under 300 people (full time equivalents), excluding the other personnel employed in Northland in log harvesting, transport, etc. Hence, New Zealand's inability to export logs to China and/or India would have serious consequences on Northport Ltd, other Port User businesses and the Northland economy in general.

Northport has been a member of STIMBR for many years and fully supports the many streams of work undertaken to meet the '2020 deadline'.

We are therefore pleased to see the progress and scientific underpinning submitted for EDN and urge the EPA to make a clear judgement in a timely manner.

One area we would urge the EPA to investigate carefully is the setting of the TEL with regard to the available detectors. With methyl bromide, due to the detectors being non-discriminating for other VOCs and having a limited lower range, there are times when the TEL is being approached across the year, even though this is not actually related to the presence of methyl bromide; it is simply a function of a high 'minimum reading' on the detector and the presence of other gases that the detector measures inadvertently.