

Environmental Protection Authority

Submission on Approval of EDN as Log and Timber Fumigant

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About PF Olsen PF Olsen's interest in this application is very material and direct.

PF Olsen managed the harvest of 4.2 million tonnes of logs in 2017. Of this about 70% or 3.0 million tonnes are exported. That is equivalent to 2 shiploads per week.

Importance of the export log trade New Zealand's log trade is dominated by China at about 18 million m³ in 2017. Logs stored above deck on China boats require MeBr fumigation, as do all logs to India, another large and expanding export destination.

The logs that are exported are primarily the lower grade parts of the tree, with the better quality pruned and structural logs, as well as pulp logs, consumed by domestic mills. Harvesting to supply these logs, without a profitable export log market for the lower grade logs would be problematic for most forest owners.

Thousands of kiwi jobs rely upon this log trade, and not just on ports. Any disruption to it would have material ripple down effects:

1. NZ forest harvest levels and their crews and log transport trucks working would be disrupted hugely and most likely materially drop off.
 2. As a result supply of the better grade parts of the trees to domestic processors would also drop off, reducing incomes and jobs in the domestic processing sector. Or, if forced to cut lower grade logs as an alternative, reducing profitability and economic viability of some mills at least.
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EDN attributes

Fumigants are poisons and most people don't like poisons. We get that.

What we are dealing with here is trading partner requirements to manage the biosecurity risk of a major export commodity; just as we demand for many imports to New Zealand.

So the argument for approval of EDN really hinges on:

1. Is it an effective fumigant?
2. Is it less harmful to the environment than MeBr?
3. Can it be applied safely?

From our reading and understanding of the chemical, the tests and science behind those the answer to all 3 questions above is YES.

On that basis we support the approval of EDN.

Verbal

I wish to speak about this submission at the hearing should that opportunity arise.
