



SUBMISSION FORM

For Hazardous Substance and New Organism Applications

Once you have completed this form

Send by post to: Environmental Protection Authority, Private Bag 63002, Wellington 6140

OR email to: submissions@epa.govt.nz

Once your submission has been received the submission becomes a public document and may be made publicly available to anyone who requests it. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.

Submission on application number:	APP202804 - EDN
Name of submitter or contact for joint submission:	Don Hammond
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 I wish to keep my contact details confidential

The EPA will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. We will use your contact details for the purposes of processing the application that it relates to (or in exceptional situations for other reasons permitted under the Privacy Act 1993). Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above. We may also use your contact details for the purpose of requesting your participation in customer surveys.

The EPA is likely to post your submission on its website at www.epa.govt.nz. We also may make your submission available in response to a request under the Official Information Act 1982.

-
- I support the application
- I oppose the application
- I neither support or oppose the application

The reasons for making my submission are¹: (further information can be appended to your submission, see footnote).

Please see attachment

All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.

- I wish to be heard in support of my submission (this means that you can speak at the hearing)
- I do not wish to be heard in support of my submission (this means that you cannot speak at the hearing)

If neither box is ticked, it will be assumed you do not wish to appear at a hearing.

I wish for the EPA to make the following decision:

I wish the EPA to support the application and register EDN with the controls proposed in the application

¹ Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.



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10th April 2018

Environmental Protection Authority
Wellington

Application to Register Ethanedinitrile (EDN) for Phytosanitary Treatment of Logs

This submission is presented by Don Hammond, Managing Director of Hammond Resource Management Ltd, a consulting business that works primarily with owners of production forests.

Declaration of a common interest: I am a forest owner and also serve as the independent Chairperson of the Stakeholders of Methyl Bromide Reduction Inc.

This submission strongly supports the registration of EDN.

Production forests, (mostly radiata pine and Douglas fir) occupy about 6-7% of NZ's land area and are the third or fourth largest earner of export revenue for our economy. Currently about 32million tonnes of logs are harvested each year from these forests, and of this approximately 60% of that volume is exported as logs.

The majority of exports are to China (around 75%), and India with small volumes also going to other countries. Both of our main trading partners, (China and India) require logs to be treated in some way to prevent insects being inadvertently sent to these countries on untreated logs.

Currently, India only accepts methyl bromide (MB) treatment, while China accepts MB, phosphine and some risk mitigation measures to reduce the risk.

The primary reason MB is used in this trade is that to date, there has been no other efficacious option for fumigation treatment.

Global agreements seek to reduce and phase out the use of MB due to the damage it does to the atmosphere, but those same agreements accept and allow the ongoing use of MB for phytosanitary use. Those agreements also encourage work to find alternatives to MB so that MB can be phased out without increasing the risk of unwanted pest species being transported around the globe.

Domestic processing capacity would need to at least treble to utilise the logs currently produced from our production forests, a scenario that is currently extremely unlikely. Without domestic processing, logs must be exported as the only other option. The need to export large volumes of logs, by its very nature then requires continued phytosanitary treatment activity including the use of fumigants.

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If there were to be no export log trade due to importing countries refusing to accept our logs, there would be no reason to plant the forests in the first instance. In turn this has implications for the current government policy to increase the forested area and for the nation's ability to meet its carbon commitments.

EDN is the only potential alternative fumigant that has been proven able to achieve the outcomes sought; ie, effective treatment of logs to kill insects that might otherwise establish in other countries and to reduce or remove the adverse effect of MB on the atmosphere.

The application demonstrates that EDN can be used safely, is effective and has considerable environmental benefits over MB.

For these reasons and to ensure that forest owners continue to have the confidence to invest in long term investment decisions (25-30 year horizons), it is essential to have suitable and effective phytosanitary fumigation tools. Registration of EDN provides the confidence that both forest owners and importing countries need to ensure our ability to continue trading and hence investing in plantation forestry in NZ.

The writer acknowledges that using chemical fumigants needs to be carefully managed and reduced wherever possible. The forestry sector continues to invest heavily in seeking alternative treatment (both chemical and non-chemical) to meet the needs of trading partners, but also, recognises the need for ongoing trade. The ability to use EDN to replace MB is a major environmental improvement and as a result of this improvement, should be widely supported.

This submission strongly supports the registration application for EDN as presented.

The writer wishes to be heard in support of this application.

Yours sincerely

Don Hammond
Managing Director
NZIF Registered Forestry Consultant.