

**Before a Decision-Making Committee
Of the Environmental Protection Authority**

APP203660

Under	the Hazardous Substances and New Organisms Act 1996
In the matter of	the modified reassessment of methyl bromide
By	Stakeholders in Methyl Bromide Reduction Inc Applicant

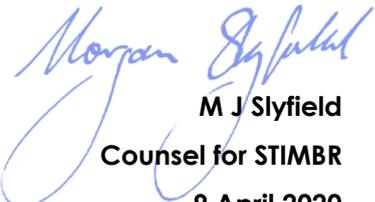
11TH MEMORANDUM OF COUNSEL FOR THE APPLICANT

9 APRIL 2020

Counsel Acting
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1. By its Direction and Minute WGT011 the Decision-making Committee (**DMC**) requested Bay of Plenty Regional Council, Atmospheric Science Global, Genera and Golder to confirm by 10 April 2020 that they will be able to provide certain information that the DMC has requested.
2. The DMC also requested to know when the information would be provided.
3. The information described at paragraph 1 above is required for the purposes of the further air dispersion modelling that STIMBR has commissioned from its expert, Mr David Sullivan.
4. By Direction and Minute WGT011 the DMC also requested STIMBR to confirm by 10 April 2020 an updated delivery date for the additional air dispersion modelling and associated report.
5. Mr Sullivan has commenced work on the air dispersion modelling, and advises that work is progressing despite the impacts of COVID-19, but some of the work cannot be completed until Mr Sullivan has access to the additional information described at paragraph 1 above.
6. It is therefore not possible for Mr Sullivan, and in turn STIMBR, to accurately estimate the delivery date for the additional modelling and report until the responses described in paragraph 2 above are received.
7. STIMBR therefore requests a variation to paragraph 9(e) of Direction and Minute WGT011 so as to require STIMBR is to confirm an updated delivery date for the additional air dispersion modelling and associated report within three working days of receiving confirmation of the dates on which other parties will provide the information described in paragraphs 9(a) to (c). STIMBR respectfully submits three days is a reasonable time to allow Mr Sullivan to take account of the answers provided by other parties and liaise (from the USA) with STIMBR to formulate a reliable response.


M J Slyfield
Counsel for STIMBR
9 April 2020