

**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

17TH MEMORANDUM OF COUNSEL FOR THE APPLICANT

27 JULY 2020

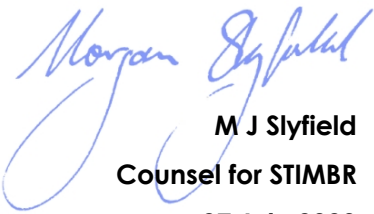
Counsel Acting

M J Slyfield
Stout Street Chambers

(04) 915 9277
morgan.slyfield@stoutstreet.co.nz
PO Box 117, Wellington

Evidence for STIMBR

1. By Direction & Minute WGT016 the DMC directed that all evidence in respect of the hearing is to be filed with the EPA by 5pm on 27 July 2020.
2. In accordance with that direction, STIMBR is filing with this memorandum:
 - (a) Seven statements of evidence, being statements by:
 - (i) Don Hammond
 - (ii) Ian Gear
 - (iii) Jack Armstrong
 - (iv) David Sullivan
 - (v) David Fletcher
 - (vi) Mark Pemberton, and
 - (vii) Kieran Murray; and
 - (b) A report by The Institute of Environmental Science and Research Limited, "Assessment of Fumigants Used in the Treatment of Timber – Addendum" (July 2020).
3. For completeness, STIMBR records that the application also included Toxicity and Ecotoxicity reports (at Appendices 3 and 4), and unless the DMC has any questions relating to those reports, STIMBR does not propose to call the authors (Lynne Clapham and Chris Leesteere, respectively) to give evidence. STIMBR seeks confirmation whether the DMC wishes to put questions to either of the authors of those reports, so that it can arrange their attendance for the hearing if need be.


M J Slyfield
Counsel for STIMBR
27 July 2020