

**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

19TH MEMORANDUM OF COUNSEL FOR THE APPLICANT

5 AUGUST 2020

Counsel Acting
M J Slyfield
Stout Street Chambers

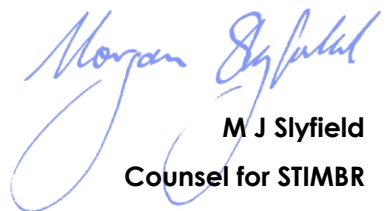
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Clarification concerning right of reply

1. In paragraphs [6] to [8] of Direction & Minute WGT019 the DMC has provided guidance about the roles of STIMBR's presentation and right-of-reply.
2. The guidance is not expressed as directions, so STIMBR seeks clarification that:
 - (a) On 11 August STIMBR's witnesses will not be allowed to respond to the Staff Report, the Science Report, the Kaupapa Kura Taiao report, or any of the other evidence or information that has been provided to the DMC on (or after) 27 July 2020;
 - (b) On 17 August, as part of STIMBR's right-of-reply, STIMBR's witnesses will be allowed to present responses to those reports, evidence and information (and any other information that is presented during the course of the hearing).

Please confirm whether this is correct; and if not, clarify what the correct position is.

3. STIMBR acknowledges that the DMC has allocated an additional 30 minutes for STIMBR's right-of-reply (taking the total to 60 minutes). STIMBR considers this is unlikely to be sufficient to enable STIMBR to respond on all relevant matters, but this is better judged during the course of the hearing. STIMBR therefore reserves the right to request additional time for its reply in due course.


M J Slyfield
Counsel for STIMBR
5 August 2020