

**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

27TH MEMORANDUM OF COUNSEL FOR THE APPLICANT

14 APRIL 2021

Counsel Acting

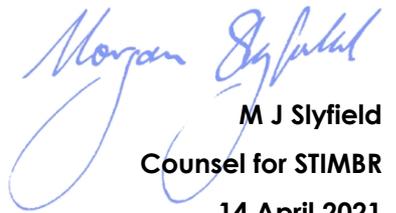
M J Slyfield
Stout Street Chambers

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

Request for clarification and further directions

1. This memorandum seeks clarification and further directions arising from two matters covered in Direction & Minute WGT032 (14 April 2021).
2. First, the DMC has directed (at [7] and [14]e) that the Golder Associates (New Zealand) Ltd (**Golder**) report is independently reviewed by Todoroski Air Sciences (**TAS**) and Atmospheric Science Global (**ASG**).
3. This follows from the DMC's observation (at [6]) that the Golder report has not been independently reviewed by other experts, unlike the other available modelling reports.
4. However, the DMC makes the same observation about the Sullivan Environmental Consultants (**SEC**) report, yet the DMC has not directed TAS and ASG to review the SEC report. STIMBR requests that the DMC clarify if there is a reason why review has not been sought for the SEC report?
5. Second, the DMC has (at [11]-[13] and [14]) extended to Bay of Plenty Regional Council (**BOPRC**) the opportunity to comment on
 - (a) the WorkSafe monitoring programme,
 - (b) the Golder report, and
 - (c) the EPA's Update Report.

STIMBR has not been provided the opportunity to comment on the WorkSafe monitoring programme or the EPA's Update Report; and as far as STIMBR is aware no other submitter has been extended any of the opportunities granted to BOPRC. STIMBR respectfully requests that all parties be provided the same allowances afforded to BOPRC, in order to avoid any party being prejudiced.


M J Slyfield
Counsel for STIMBR
14 April 2021