

**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

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**29<sup>TH</sup> MEMORANDUM OF COUNSEL FOR THE APPLICANT**

**12 MAY 2021**

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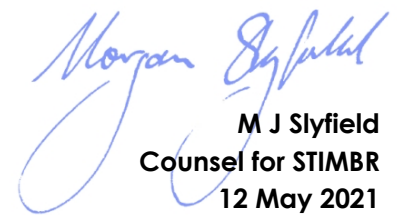
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## REQUEST FOR FURTHER DIRECTIONS

1. By Direction & Minute WGT033 the Decision-making Committee (**DMC**) asked parties to provide any comments on additional information listed in paragraph 12 of that Direction & Minute by 6 May 2021.
2. By Direction & Minute WGT034 the DMC provided an extension on that deadline to 13 May 2021.
3. In the course of reviewing the additional information last week one of STIMBR's air dispersion experts, Ms Nieuwenhuijsen, identified an error in the additional air dispersion modelling by Todoroski Air Services (**TAS**). It is an error that mis-states the modelled emissions from log stacks multiple-fold.
4. Ms Nieuwenhuijsen has since contacted Mr Todoroski and he has acknowledged the error. He has subsequently advised Ms Nieuwenhuijsen that he has contacted the EPA to inform them of the error.
5. Until this error is corrected, STIMBR submits it is inappropriate for parties to comment further on the additional information. The additional information (specifically the EPA's Update report, and the reviews by Sullivan Environmental Consulting and Golder submitted with 25<sup>th</sup> Memorandum of Counsel for the Applicant on 29 January 2021) are based on the TAS modelling that contains the error.
6. STIMBR therefore requests that the DMC issue further directions delaying the deadline for comments until such time as the error has been corrected.



**M J Slyfield**  
**Counsel for STIMBR**  
**12 May 2021**