

**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

2ND MEMORANDUM OF COUNSEL FOR THE APPLICANT

13 November 2019

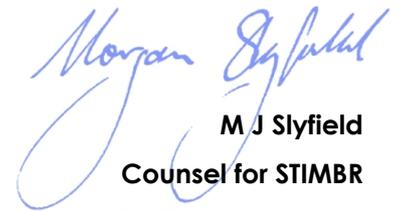
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1. This memorandum responds to the request for confirmation of attendance at the hearing. STIMBR's response is subject to the matters raised in the 1st Memorandum of Counsel filed yesterday.
2. Counsel for STIMBR will be in attendance at every day of the hearing, in all three hearing locations. Also in attendance for STIMBR for the duration of the hearings will be Mr Ian Gear (Research Director / Executive Officer of STIMBR) and Dr Jack Armstrong (a phytosanitary treatment scientist, Quarantine Scientific Limited).
3. An opening representation will be made by counsel for STIMBR on 3 December. It is estimated this may take between 30 minutes and an hour.
4. STIMBR presently expects to call the following witnesses:
 - (a) Don Hammond, chair of the Board of STIMBR;
 - (b) Dr Jack Armstrong, phytosanitary treatment scientist;
 - (c) Glen Mackie, Technical manager, NZ Forest Owners' Association;
 - (d) Derek Miller, occupational hygienist;
 - (e) Paul Nichols or Peter Hills, forestry consultants;
 - (f) David Sullivan or Dennis Hlinka, consulting meteorologists;
 - (g) Mark Self, CEO of Genera.
5. STIMBR estimates half an hour will be needed for most of these witnesses to give evidence (not including questions from the DMC), and an hour may be needed for Dr Armstrong and Mr Sullivan (again, not including questions from the DMC).
6. Due to pre-existing commitments Mr Hammond is only available on 3 December 2019.
7. Due to pre-existing commitments, Mr Sullivan is not available from 2 December to 6 December 2019, and accordingly STIMBR requests that time is allocated for his presentation later in the schedule. Mr Sullivan resides and works in the USA, and accordingly STIMBR requests that an allowance be made for him to attend by audio-visual link at the appropriate time.

8. In addition, STIMBR intends to make available Lynne Clapham and Chris Lee-Steere (who authored, respectively, Appendices 3 and 4 of the Application) to answer any questions that may arise in their fields of expertise. Mr Lee-Steere resides and works in Canberra, Australia. Should his attendance be required, STIMBR requests that an allowance be made for this to occur by audio-visual link.

9. STIMBR understands from paragraph 11 of the Hearing Procedures that it will have an opportunity to reply. Until closer to the relevant time, it is difficult for STIMBR to reliably estimate how long this may involve.



M J Slyfield
Counsel for STIMBR
13 November 2019