

**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

4TH MEMORANDUM OF COUNSEL FOR THE APPLICANT

3 DECEMBER 2019

Counsel Acting
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1. This memorandum responds to paragraph 15(a) of Direction and Minute WGT001 (18 November 2019) and paragraph 19(a) of Direction and Minute WGT002 (28 November 2019).
2. Accompanying this memorandum is all of the monitoring data held by the Applicant in respect of Tauranga Port, Napier Port and Northport. All of this information has been provided to the Applicant by Genera Ltd. It comprises (in chronological order):
 - (a) A report dated 14 January 2015 by Beca Pty Ltd titled *Assessment of Effects – Discharges to Air from Methyl Bromide Fumigation* (which describes monitoring at pages 19-21).
 - (b) A letter dated 24 November 2015 from the Centre for Public Health Research at Massey University (which describes air sampling undertaken at Tauranga, which measured methyl bromide among other compounds).
 - (c) Two pages of tables dated February 2017-April 2018 titled *Environmental Monitoring Update Port of Tauranga*.
 - (d) Two pages of undated tables, which the Applicant understands depict some monitoring data for the period January – May 2018 for Northport.
 - (e) A powerpoint presentation dated April 2018 by Genera Limited (which contains a number of slides that refer to monitoring at the Port of Tauranga).
 - (f) A report dated March 2019 by Ecocific Environmental Services titled *Environmental Assessment Report Methyl Bromide and Total Volatile Compounds at the Port of Tauranga* (which describes monitoring undertaken in March 2019).
 - (g) An Air Discharge Consent Application dated 29 October 2019 by Beca Limited for Genera Limited (which describes monitoring on pages 19, 21, 25-27 and 36, and attaches at Appendix D a report dated October 2019 by Golder Associates (NZ) Limited titled *Technical Air Quality Assessment* which describes monitoring in section 7.0 and in Appendix F).

3. The DMC has directed the Applicant to address the matters set out in paragraph 13 of WGT001 in respect of all the above data.
4. The Applicant did not prepare or commission any of the data, and is not yet in a position to comment on the quality, robustness and nature of the data. The Applicant is undertaking further work to assess the quality, robustness and nature of the data.


M J Slyfield
Counsel for STIMBR
3 December 2019

