



May 13, 2021

Direction & Minute WGT034 of the Decision-making Committee (DMC) – 6 May 2021

In WGT034, the DMC has directed that feedback from all parties on the “additional information discussed in WGT033 and above” is due by the close of business on 13 May 2021.

Clear the Air remains firmly against any further use of Methyl Bromide at the Port of Tauranga without full recapture. The applicant should be held to the 2010 decision made by the EPA then and accepted in good faith by the community and industry.

Clear the Air Mount Maunganui supports the comments from the BOPRC (12 April 2021) which identify that the WorkSafe commissioned reports lack any real-world analysis as to how Methyl Bromide is actually applied by operators such as Genera or how Ports operate:

“The size of the log fumigation events summarised in the AirMatters’ report which were reported separately as AirMatters interim reports 12-20 are relatively small compared to normal practise, with **six single low row events and one double log row ventilation monitored**. This also calls into question just how representative of typical fumigation practise the results are.” (Emphasis added).

Clear the Air supports TMFAGs submission and shares concerns voiced in their submission. We believe that as a community we continue to be put at risk but endless delays in this process. Methyl Bromide cannot continue to be used with such close proximity to our town.

We believe the report tries to minimise the alarming peer review criticism on the lack of proper probative sampling and monitoring data. Despite lacking in detail, the monitoring samples still prove that Methyl Bromide has been applied unsafely outside of the recommended quantities and outside the recommended buffer distances, and it is clear that this has been the case at the Port of Tauranga for at least the past decade. The SEC January 2021 Report suggests restrictions on levels of log stacks, and restrictions on Methyl Bromide use to certain times of day and subject to prevailing winds. At the same time, the size of fumigation events, speed of release, and timings of ventilation are still areas of uncertainty, without proper data or suggested controls.

As commented by the BOPRC, some of the types of mitigation suggested by STIMBR such as in the SEC January 2021 Report, will also practicably be impossible to monitor and enforce for Regulatory Authorities. The proposal for timing and log stack size restrictions ignore the time pressures for cargo handling on the Port docks and narrow window of time for ships to enter and exit ports, with loading completed. Efficiency and time restrictions were also discussed by logging Industry submitters at the EPA hearing. It is also inconsistent with the pattern of behaviours of how operators at the Ports have managed



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application of Methyl Bromide in the past, including where consent condition statutory compliance obligations have been ignored by operators and their workers in the 'real time' context.

While this process keeps getting delayed, the use of Methyl Bromide at the Port of Tauranga and elsewhere continues, unabated, in breach of the requirements in the 2010 EPA Reassessment (with the obligation to comply with that decision being suspended time and again).

All of the modelling makes it clear that the Tauranga Port is a wholly unsuitable location for Methyl Bromide fumigation of log stacks or ship holds. The EPA must not allow this practice to continue without requiring recapture of 100% to the level of 5ppm as was the direction in the 2010 Reassessment.

We trust you to make the right decision for our Community - Residents, Workers, Children, Athletes and Iwi.



Clear the Air – Mount Maunganui