

25 June 2021

New Zealand Environmental Protection Agency
Private Bag 63002
Wellington
Email: Reassessments@epa.govt.nz

COMMENTS REGARDING THE WORKSAFE/PDP REPORT IN RESPONSE TO DMC DIRECTION AND MINUTE WGT037-10 JUNE 2021; APPLICATION APP203660

Introduction

Matariki Forests response to the DMC request for comments regarding the Direction & Minute WGT037.

Submission

Matariki Forests is aware of the report STIMBR has commissioned from Golder in response to DMC WGT037 Worksafe/PDP Report.

We note and support Golder's conclusion the PDP "*provides further validation of CALPUFF as an appropriate model for the assessment of effects from fumigation activities.*"

Perhaps more critically; we note Golder has identified an error in the PDP report when an incorrect data set was used. Subsequent, to identifying and then confirming the error Golder has undertaken analysis demonstrating scaling the CALPUFF results by 25%, as is suggested by PDP, is not warranted. Golder believes sufficient conservatism is already built into the deterministic modelling assessments presented such this modelling is expected to result in overpredictions of effects.

We request the DMC takes Golder's findings set out in its report to STIMBR into account when making decisions and does not embed unwarranted conservatism in controls it may determine.

If you have any queries in relation to this submission please contact me on [REDACTED] or email [REDACTED]

Yours sincerely

[REDACTED]

Chris Rayes
Marketing Director