

# SUBMISSION FORM

For Hazardous Substance and New Organism Applications

**Once you have completed this form**

**Send by post to:** Environmental Protection Authority, Private Bag 63002, Wellington 6140

**OR email to:** [submissions@epa.govt.nz](mailto:submissions@epa.govt.nz)

**Once your submission has been received the submission becomes a public document and may be made publicly available to anyone who requests it. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.**

<b>Submission on application number:</b>	APP203465
<b>Name of submitter or contact for joint submission:</b>	Stella McLeod
<b>Organisation name (if on behalf of an organisation):</b>	Mr AppleNZ
<b>Postal address:</b>	2 Station Road Whakatu Hawkes Bay 4161
<b>Telephone number:</b>	021512993
<b>Email:</b>	<a href="mailto:stella.mcleod@mrapple.com">stella.mcleod@mrapple.com</a>

I wish to keep my contact details confidential

The EPA will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. We will use your contact details for the purposes of processing the application that it relates to (or in exceptional situations for other reasons permitted under the Privacy Act 1993). Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above. We may also use your contact details for the purpose of requesting your participation in customer surveys.

The EPA is likely to post your submission on its website at [www.epa.govt.nz](http://www.epa.govt.nz). We also may make your submission available in response to a request under the Official Information Act 1982.

- I support the application
- I oppose the application
- I neither support or oppose the application

**The reasons for making my submission are<sup>1</sup>: (further information can be appended to your submission, see footnote).**

The reasons for making my submission are : (further information can be appended to your submission, see footnote).

Methyl Bromide Reassessment

Developing the Japanese market

Mr AppleNZ NZ has been working directly with Importers and distributors since 2014 to develop a market in Japan for Hawkes Bay grown apples. The major hurdle / challenge we have faced since then has been with developing, getting commitment and building confidence with Japanese retailers. There is demand and an opportunity to create growth through education / promotions for varieties such as NZ Queen, Fuji, Diva and Pink Lady. The buyers are developing a taste for NZ Queen which gives Mr AppleNZ another high-priced market alternative to China. Fuji presently supplied to Taiwan is also popular in Japan and Pink Lady (Cripps Pink) is making a tentative entrance

The Japanese market is counter seasonal to New Zealand and therefore allows the supply of medium sized apples without conflict to the Japanese growers who supply large speciality apples to the local Japanese market and for export.

In 2019 Mr AppleNZ jointly supplied Jazz with Turners & Growers into the Japanese market.

Commitment to Japan

Mr AppleNZ is committed to growing and maintaining the Japanese market. The protocol required to meet the fumigation specifications are specialised and monitored throughout the logistics chain with high pressure apple washers, special insect proof packaging, purpose-built fumigation rooms and coolstores monitored to meet tight coolstorage specifications. It requires trained and dedicated staff to meet this protocol which is over and above that required for other markets. The investment has been made and as a result the market is growing.

Mr AppleNZ has invested significantly in a high-pressure apple washer, fumigation facility, Coolstore segregation, labour resource, in market promotions, packaging and packing which @ NZD \$10.00 / carton in added cost over and above every other market. This has meant Mr AppleNZ has invested more than NZ \$1-million since 2014.

Methyl Bromide Recapture

Without the use of Methyl Bromide there are no other immediate alternatives to allow the supply of apples to Japan beyond 2020. Longevity of the Japanese market and the business with the Japanese importers are all in jeopardy beyond 2020.

Alternatives to methyl bromide such as GRAS systems will need to be trialled to confirm insect kill and no toxicity to the fruit for all varieties. This work would require at least 5+ years research to confirm and develop a treatment before submitting to the Japanese authorities for approval. A system-based approach being developed by NZAPI working with Plant and Food and MPI is on the table for discussion with Japan, but this is unlikely to be available for several years.

Mr AppleNZ jointly with Turners & Growers undertook recapture trials on behalf of the apple industry to determine the commercial viability of recapturing Methyl Bromide. Recapture to 80% (250ppm) was achieved in 2 ½ hours without fruit damage and within the logistics time frame already established for the Methyl Bromide cold storage treatment for the control of codling moth.

However, to achieve recapture to 5ppm will require fruit to be at 12 Co for even longer, possibly additional hours and will adversely affect fruit quality both visually and internally making the fruit yellow and soft. The Japanese market is discerning

<sup>1</sup> Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.

---

so any loss in fruit quality will be detrimental to fruit sales and the marketing programme Mr AppleNZ has invested more than NZ \$1-million since 2014.

Mr AppleNZ is seeking a transitional Methyl Bromide 80% re-capture treatment option which will keep the Japanese market open to us. This will allow continuing dialogue with potential buyers, the use of the present infrastructure and skills investment while allowing time to fully establish the systems-based approach in conjunction with the Japanese authorities

Karen Morrish

Group Health & Safety, Compliance and Sustainability Manager.

Ben McLeod

Retail Sales Manager

Stella McLeod

Research and Development Manager

---

**All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.**

I wish to be heard in support of my submission (this means that you can speak at the hearing)

I do not wish to be heard in support of my submission (this means that you cannot speak at the hearing)

**If neither box is ticked, it will be assumed you do not wish to appear at a hearing.**

---

---

**I wish for the EPA to make the following decision:**

To extend the use of Methyl Bromide use with recapture to 80% for the duration it takes the apple industry to have an alternative phytosanitary method approved by the Japanese.

---