

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

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.

Submission on application number:	APP203660
Name of submitter or contact for joint submission:	Sarah Duncan
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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. We also may make your submission available in response to a request under the Official Information Act 1982.

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

The reasons for making my submission are¹: (further information can be appended to your submission, see footnote).

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:

We support the application to reassess the recapture requirement for methyl bromide to 80%.

¹ 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.



Methyl Bromide Submission

23rd August 2019.

We support the application to reassess the recapture requirement for methyl bromide to 80%, as without it there will be severe and adverse impact on Rockit Global Limited's ability to supply into the Japanese market. A commercially feasible recapture option (i.e. 80% recapture) is required for the apple industry before the 'systems approach' is approved by Japan MAFF.

Rockit Global Ltd (RGL) own plant variety rights (PVR) globally to the apple variety PremA96 marketed as "Rockit™". The fundamental proposition of Rockit™ apples is convenience. The apples are conveniently packaged to enable the consumer to easily grab a healthy snack when on-the-go. Rockit is the only apple variety in New Zealand whereby 100% of the export product is packed into its final consumer pack in New Zealand. By packing the entire crop every year in a single packing facility, Rockit ensures that the quality and consistency is maintained.

RGL is expanding its key markets, to include Japan as one of our top-3 for the next five years. Shane Jones & Prime Minister Jacinda Ardern are both quoted on One News 6th August 2019 saying that New Zealand needs to diversify away from reliance on China and focus more on other ASEAN countries like Japan

The Official Assurance Programme (OAP) for Japan defines the import phytosanitary requirements specified by Japan MAFF. Part 3 of the OAP specifies the requirement for fumigation, and currently there is only one approved fumigator who uses only methyl bromide. MPI has approached Japan MAFF to change from fumigation to a systems-based approach, as per all other export markets, but until the OAP is updated then methyl bromide is the only approved method of fumigation that would allow export to Japan.

In 2018 Japan was the only market where Rockit™ apples were packed into tubes in-market, which resulted in a quality and consistency issue of the finished product at point of sale. This greatly hindered the success of the launch. In the future, RGL wish to pack all product destined for Japan into the final consumer pack in New Zealand thereby assuring product quality. In 2019 Rockit's submission to repack into tubes in New Zealand was approved, and hitherto 4,121 cartons (67,000kg) of product have been successfully distributed and sold to our customers. Japan is a top-three focus market for RGL for the coming 5 years, due to its high value potential. RGLs estimated export volume by 2023 to Japan is 2 million kg. To achieve this, planned investment over the coming five years include: the appointment of a local BDM and over NZ\$2m in marketing. Quality of the packaged end-product is the single most important contributor to our success in Japan, hence RGL require full control of the packing of the product in tubes in our New Zealand packhouse. This can only be achieved if the apples are packed to Japanese requirements in New Zealand

In May 2019 NZ Apples & Pears (NZAP) undertook a pilot trial investigating the recapture of methyl bromide in a commercial situation. Only 80% of the methyl bromide was recaptured



without compromising fruit quality. Further trials can't be undertaken until June 2020 due to the seasonality of apple production. 80% recapture was found to be commercially

feasible, however total MeBr recapture (<5ppm loss) will take days (as opposed to approximately 2 hours for 80%) if at all technically feasible, which would adversely affect apple quality due to a lack of refrigeration. Fruit which is not refrigerated for that length of time will lose moisture, accelerating shrivel and other quality attributes which will unfavourably affect the apple.

Several potential chemical and non-chemical alternatives to methyl bromide have been identified and some of these alternatives are currently being evaluated. However, none of the alternatives have been adequately shown to be as effective or economical as methyl bromide. Therefore, there is an urgent need to develop and evaluate effective, economic alternatives to the agricultural use(s) of methyl bromide as a postharvest commodity pest treatment.

The apple industry, which uses a small amount of methyl bromide compared to the timber industry, should at the least be exempt from a <5ppm recapture rate when the regulations come into force in October 2020. Quarantine and pre-shipment (QPS) fumigation is exempt from the Montreal protocol requirements, so there is a reasonable argument that until an effective alternative is available, methyl bromide use with a re-capture rate of 80% is the most effective and pragmatic approach. If no restrictions were implemented until, either an alternative to methyl bromide fumigation were developed or even better if Japan changed to a systems-based approach to phytosanitary requirements is accepted.