



Applications and Assessment: Hazardous Substances
Environmental Protection Authority

Wellington

METHYL BROMIDE MODIFIED REASSESSMENT SUBMISSION

August 2019

Introduction

Rayonier New Zealand Limited has been actively involved in the New Zealand Forest Industry since 1988. Recently Rayonier NZ Limited has been the manager of Matariki Forests Limited, a joint venture forestry investment between Rayonier Incorporated and Stafford Investments. Matariki Forests is New Zealand's third largest forestry estate. With a strong regional presence Matariki Forest locations extend from Northland throughout Bay of Plenty and Hawkes Bay to Canterbury and Southland.

Background

In 2018 New Zealand harvested approximately 36.0 million m³ of logs of which the domestic market consumed 15.0 million m³ and the balance 21.0 million m³ was exported. Matariki Forests harvest in 2018 was 2.4 million m³ of which 50% was supplied to the domestic wood processing industry and the balance exported to China, India, South Korea and other smaller Asian markets. This export activity underpins Matariki's harvesting operations and Matariki's business would be seriously undermined without the facility to fumigate cargo destined for India or be loaded on the deck of log carrying vessels.

Wherever possible Matariki already supplies the best/most suited grades of logs to domestic wood processors. Other grades of logs are exported overseas and if the use of Methyl Bromide were to cease Matariki's business would be severely financially impacted. This in turn would reduce Matariki's ability to create employment in the regions where Matariki's forests are located.

Submission

1. Matariki Forests support the proposed change that 80% of methyl bromide remaining at the completion of fumigation must be recaptured. The current standard requiring recapture to a level of 5ppm by the end of the fumigation period is and never was feasible with the technology available.
2. Matariki Forests also supports a refinement to the current October 2020 deadline for methyl bromide recapture in ships holds and supports an extension to October 2030. Matariki Forests currently exports one full vessel per month to India. The full under deck cargo must be fumigated with methyl bromide. While work is proceeding to develop technology able to recapture methyl bromide used in a ship hold the technology currently is not able to recapture even 80% of the methyl bromide used in such large spaces as holds on ships.

3. Matariki Forests also submits the date by which all methyl bromide fumigations be subject to 80% recapture standard be extended by one year from the date of the EPA's decision on the modified reassessment. This will give industry the necessary time to implement changes and install technology to meet recapture obligations.

Matariki Forests would like to be heard at the EPA hearing on methyl bromide modified reassessment.

Your sincerely

A handwritten signature in black ink that reads "Chris Rayes". The signature is written in a cursive style with a large, sweeping 'C' and 'R'.

Chris Rayes

Marketing Director