

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:	David Hughes, CEO
Organisation name (if on behalf of an organisation):	The New Zealand Institute for Plant and Food Research Limited
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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).

Plant & Food Research has led research seeking viable alternative fumigants to replace Methyl Bromide (MB) for the primary sectors, including horticulture and forestry. Some alternative technologies are showing promise however more time and resources are needed for these to be developed, validated and/or approved. There is a risk that trade will be disrupted if MB cannot be used after 28 October 2020. The maintenance of viable supply chains is important for the long term sustainability of those primary sector export sectors that would otherwise be affected by the October 2020 deadline and current recapture residue levels.

The negative effects of a supply discontinuity on relevant sectors in both New Zealand and the Pacific Islands (where Plant & Food Research has active research collaborations to support fresh produce exports that meet New Zealand's biosecurity requirements), could potentially be averted if the proposed changes to the recapture controls as outlined in the EPA application are adopted.

The applicant has detailed the conditions that can be met in terms of recapture levels with current technology. Reduction in MB emissions is achievable and desirable while research continues into improving existing MB recapture technology.

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 support the proposed changes to the recapture controls as proposed by the Applicant.

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.