

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:	Gary Jones
Organisation name (if on behalf of an organisation):	New Zealand Apples and Pears
Postal address:	New Zealand Apples and Pears, 507 Eastbourne Street West, Hastings, 4122
Telephone number:	021758314
Email:	Gary@applesandpears.nz

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.

- 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).

Methyl Bromide use in the New Zealand apple and pear industry is not specifically known but is assumed to represent approximately 0.1% of the total methyl bromide use in New Zealand (Pers. Comms. Mark Self, Genera CEO). This small volume is due to methyl bromide only being required for apples going to Japan, as per Japanese regulations to control codling moth. Methyl bromide treatment rates for apples is 24 g/m³, which is a much lower rate than forestry and achieves levels less than 300ppm to recapture 80% of the fumigant. All other apples exported from New Zealand are managed, from a phytosanitary perspective, using world renowned “systems approach” from orchard through to post-harvest.

Japan is a valuable market for New Zealand apples firstly due to the exclusivity of the market – New Zealand apples dominate the Japanese import apple market especially considering the unique variety mix of New Zealand bred cultivars. There is significant interest in growing New Zealand apple varieties in Japan under license. This will continue to drive a need for the import of New Zealand apples for counter seasonal supply of these licensed varieties.

Secondly, the CPTTP trade agreement will lower the import tariff on New Zealand apples from 17% to 0% by 2028 and as of April 2019 the tariff had already been reduced from 17% to 11.4%. Currently, the Japanese market will return \$15.3 million NZD at FOB in the 2019 season. However, this market has been estimated to return \$100 million annually by 2030 which is due to the need for counter seasonal supply of quality New Zealand apples, and an eventual movement away from methyl bromide towards a systems approach, therefore increasing the accessibility for New Zealand exporters.

New Zealand Apples and Pears (NZAPI) recognizes the need for a shift away from methyl bromide treatment towards a systems approach to manage phytosanitary risk. Postharvest treatments including methyl bromide compromise fruit quality and a systems-based approach is the preferred method of supply. The systems approach is a highly effective integrated pest management system that provides phytosanitary outcomes at least equivalent to methyl bromide treatment, as proven with the export to other codling moth sensitive markets. NZAPI is working with MPI to gain acceptance of the systems approach with Japan as this is the industry’s preferred approach to manage phytosanitary outcomes. The process for Japan to accept the systems approach could take years, therefore NZAPI is seeking a transitional methyl bromide 80% recapture treatment option while the systems approach is agreed. In parallel, the apple and pear industry have undertaken more than a decade worth of research to find an alternate post harvest disinfestation treatment to replace methyl bromide, but none have been found suitable that are effective on codling moth and do not compromise fruit quality. This research continues under NZAPI’s research and development programme.

In 2019 NZAPI funded a pilot trial to determine the potential feasibility of recapturing methyl bromide in a commercial fumigation situation used for quarantine treatment of apples for export. Results from this trial showed that 80% recapture of methyl bromide within two hours could be achieved without compromising fruit quality.

Recapture to 5ppm without reducing fruit quality (recapture to 5ppm takes considerably longer, days not hours) is not currently possible and not expected to be technically feasible so if enacted would effectively close the Japanese market. This would result in not only losing the current and projected annual income but jeopardise the dominant market share gained for New Zealand apples in Japan if access was gained again in the future. Recapturing market share after market closure could take years if/when Japan accepts the systems approach proposal.

The New Zealand apple and pear industry is committed to invest and grow its integrated pest management system to develop highly sustainable solutions for pest control. We are rated as the top apple growing industry in the world (World Apple Review, 2018). This is partly due to our systems approach which gives us impeccable phytosanitary outcomes while

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.

also maintaining a strict ultra-low residue programme (significantly lower than other countries with which we compete). A feasible recapture solution is needed to ensure growth into the industry's highest potential market is maintained.

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:

Allow 80% recapture of Methyl Bromide as a treatment option which will keep the Japanese market open to the New Zealand apple industry until an alternative treatment option such as a systems approach for import of apples has been negotiated between Japan and New Zealand
