



Federated Farmers of New Zealand

Submission to the Environmental Protection Agency on the
reassessment of methyl bromide

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Submission on the reassessment of methyl bromide

To: The Environmental Protection Agency

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Summary of submission

Federated Farmers supports the application for reassessment given the importance of methyl bromide for fumigation of imports and exports, and as a mechanism for dealing with biosecurity incursions.

The impacts of pea weevil infestation in the Wairarapa and associated costs stand as a recent example of the need for an effective tool for the fumigation of imports and response to biosecurity incursions.

Until feasible and effective alternatives are developed, methyl bromide plays an important role in the management of biosecurity incursion risks.

Consequently, we support realignment of standards and targets relating to methyl bromide with the practices and technologies currently available.

We consider the development and investigation of alternatives to methyl bromide a priority irrespective of the outcome of this application.

1. General submissions on the application

- 1.1 As a signatory to the Montreal Protocol on Substances that Deplete the Ozone Layer (“the Protocol”) New Zealand has phased out use of methyl bromide except for permitted uses provided for under the Protocol.
- 1.2 Consequent to this commitment to the Protocol was Environmental Risk Management Authority Decision HRC08002, in 28 October 2010 (“the decision”). The Chair’s introduction to the decision summarises the balance required well, notably outlining the roles of methyl bromide in respect to market access and biosecurity:
“On the one hand, New Zealand must protect itself from the invasion of pest species and it must meet the requirements of those countries it trades with to continue to be allowed to trade. On the other hand methyl bromide is a highly toxic substance with known health effects if not used and managed properly. It is also an ozone depleting substance and many of its uses are required to be phased out under the Montreal Protocol.”¹
- 1.3 This original decision sought to balance the adverse impacts of use with the benefits by implementing standards for the management of methyl bromide, within a ten-year timeframe (prior to October 2020). In doing so, the decision weighed the lack of alternatives to the use of methyl bromide, concluding that:
“...there is no single alternative fumigant or method of treatment to replace methyl bromide for all intended uses or overseas markets.”²
- 1.4 The conclusions and standards resulting from the 2010 decision are being revisited through the application from Stakeholders in Methyl Bromide Reduction Inc. (“STIMBR” or “the applicant”) for a reassessment of the Hazardous Substances and New Organisms (HSNO) approval for methyl bromide (“the application”).
- 1.5 The applicant notes that while the deadline for recapture has been an important driver for reducing the risks and the impacts of use of methyl bromide, the recapture standards are not currently technically or economically feasible. The application proposes a reassessment of these standards.
- 1.6 Federated Farmers considers the application is justified given the role of methyl bromide in fumigation of our imports and exports, the current lack of practical alternatives and the assessed impracticality of meeting the recapture targets proposed in the decision and to be adopted in 2020.
- 1.7 As per the application, the volume of use of methyl bromide has increased as the volume of log exports has increased, reflecting both the importance of the use of methyl bromide as a fumigant and the importance of allowing for reasonable management of the effects associated with use of methyl bromide.
- 1.8 We consider the ongoing investigation into the development and feasibility of appropriate alternatives to the use of methyl bromide remains a priority, irrespective of the outcome of this application.

¹ Environmental Risk Management Authority Decision, 28 October 2010 (Amended under s67A of the HSNO Act on 1 June 2011), page 1.

² Ibid. Para 11.1.1, page 28.

Summary

Federated Farmers supports the application for reassessment given the importance of methyl bromide for fumigation, the current lack of practical alternatives and the unfeasibility of meeting the proposed recapture targets.

We consider the development and investigation of alternatives to methyl bromide a priority irrespective of the outcome of this application.

2. Fumigation of imports and biosecurity implications

- 2.1 While recognising the application largely relates to the use of methyl bromide for the fumigation of exports, Federated Farmers underlines the use of methyl bromide in the response to and prevention of biosecurity incursions.
- 2.2 A recent example impacting the farming and rural sectors is the Pea weevil (*Bruchus pisorum*) incursion, detected in the Wairarapa in 2016 (“pea weevil incursion”). In this event, an imported consignment of peas was subject to a ‘soak test’ (an import requirement at that time) which failed to identify the presence of pea weevil. Use of methyl bromide has provided a significantly more effective measure to reduce the risk of further incursions.
- 2.3 The ban on growing peas in the Wairarapa formed a component of a wider effort to restrict the spread of pea weevil beyond that region. The broader response included use of methyl bromide to fumigate straw, machinery and equipment.
- 2.4 The pea weevil incursion and subsequent ban on the growing of peas in this area from 2016 to the present time, and the costs and effort associated with eradicating pea weevil, underlines the importance of effective fumigation of imports at the border. The economic and social impacts of the pea weevil incursion were significant, broadly outlined below:
- 2.4.1 10% of NZ pea industry production lost from the Wairarapa, at an approximate value of \$10M annually;³
- 2.4.2 Growers (and gardeners of peas) have not been able to grow peas or use/import pea straw for three years (2016/17, 2017/18, 2018/19), with one more year to come (2019/20);
- 2.4.3 Downstream economic effects have adversely impacted related industry such as peastraw sales, cartage firms, associated servicers and seed processing plant has closed down.
- 2.5 While the impacts of the pea weevil incursion has been mitigated by the growing of alternative crops and/or other land uses, the impacts remain significant and disruptive, in addition to the public sector costs incurred.
- 2.6 The initial decision noted the role methyl bromide plays in respect to managing biosecurity incursions:

³ Fresh Facts <https://www.freshfacts.co.nz/#data-tool>.

“Incursions are also detected after goods have been given clearance. In the majority of cases, methyl bromide is considered to be the most effective treatment and in some cases the only effective treatment.”⁴

- 2.7 While methyl bromide is not the only possible fumigant for seed,⁵ it is currently the most effective and efficient treatment, and therefore remains an important tool in the management of biosecurity incursions and in reducing the risk of further incursions through importation.⁶

Summary

Federated Farmers highlights the ongoing economic and environmental of methyl bromide in responding to, and preventing, biosecurity incursions.

The costs and impacts of pea weevil infestation in the Wairarapa stands as a recent significant example of the need for an effective tool for the fumigation of imports and response to biosecurity incursions.

We support the ongoing research into alternatives to and mitigation of the effects of methyl bromide, particularly in relation to ozone depletion.

Until feasible and effective alternatives are developed, methyl bromide plays a essential role in the management of biosecurity incursion risks.

3. Export benefits derived from use of methyl bromide

- 3.1 As the applicant notes, methyl bromide plays an important role in respect to export market access, particularly log exports to India. While only a proportion of exports to China are treated with methyl bromide, the value is significant.⁷ Farmers are impacted by market access for log exports through farm forestry, an important source of revenue and alternative land use option.
- 3.2 The revenue derived from products treated with methyl bromide is significant. The NZIER report outlines this contribution in respect to forestry.⁸ The export value resulting from use of methyl bromide in the India and China markets specifically is estimated at approximately \$791 million (2018 figures) per annum.⁹ The total value of exported products fumigated with methyl bromide, including horticultural exports, is estimated at \$905 million (2018 figures) per annum.¹⁰
- 3.3 As in respect to imports, the feasibility of a proportion of this export revenue is contingent on use of methyl bromide, which is in turn contingent on the requirements for recapture.

⁴ Para 13.8.3, page 40.

⁵ Phosphine is also identified as an important treatment, in “Approved Biosecurity Treatments”, MPI-ABTRT, 22 July 2019.

⁶ Methyl bromide has a significantly shorter treatment time compared to other treatment options (Ibid.).

⁷ Information on the biosecurity use of methyl bromide in New Zealand, July 2019.

⁸ Plantation forestry statistics - Contribution of forestry to New Zealand, March 2017.

⁹ Information on the biosecurity use of methyl bromide in New Zealand, July 2019.

¹⁰ Ibid.

Summary

Federated Farmers notes the significant economic value of exports, particularly log exports, and the role of methyl bromide in providing access to those markets.

4. Options and alternatives to use of methyl bromide

- 4.1 The 2010 decision noted there are no practical alternatives to the use of methyl bromide. The information and evidence provided by the applicants indicates the recapture technology envisioned when the initial decision was formed is not currently available, across the range of functions currently performed by methyl bromide.
- 4.2 While only a component of the considerations to be weighed in the reassessment, the application notes the Montreal Protocol recognises and makes provision for lack of adoption of technologies where there are no, or no economically viable options: *“Note that the Montreal Protocol does not expect adoption of technologies for methyl bromide reduction, if there are no available options or the cost of options is not economical.”¹¹*
- 4.3 The applicant has responded to a further information request around potential alternatives for treated products, noting that many have shortcomings which render methyl bromide either relatively more feasible and effective and/or the only practical option.¹²
- 4.4 Federated Farmers understand that there are no available feasible, economically viable drop in alternatives to methyl bromide. Moreover; the current recapture targets do not appear feasible given current technology and the context of current methyl bromide use.
- 4.5 Federated Farmers encourages further research into alternatives into the use of methyl bromide, and into the development of better recapture and mitigation technology. Until alternatives are feasible, we support the realignment of standards and recapture targets with the best available technology and practices.

Summary

Federated Farmers understands there are no available feasible, economically viable drop in alternatives to methyl bromide, and that the current recapture targets do not appear feasible.

We support further research into both alternatives to improvements in recapture technology.

Until alternatives and better technology are feasible, we support realignment of standards and targets relating to methyl bromide with the practices and technologies currently available.

¹¹ Ibid.

¹² Response to an additional information request from the EPA, 28 June 2019

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5. Impacts of proposed changes to recapture requirements

- 5.1 We note the expert advice sought by the applicant in respect to the adverse impacts of methyl bromide. We note the assessments providing updates on the research around the management and effects of methyl bromide largely conclude there is little additional valid research of relevance in relation to the effects of methyl bromide to inform the reassessment process beyond that considered in 2010.¹³
- 5.2 A recognised in the 2010 decision, in the application and in the supporting information, methyl bromide use creates recognised adverse impacts. Usage also provides identified benefits.
- 5.3 On balance we consider the benefits of aligning standards and recapture requirements with current feasible technology and practices outweigh the additional risks and impacts of amendments to those standards.
- 5.4 We support the proposal that changes are adopted which align requirements and standards with existing, feasible and proven practices and technology, where the net effects are considered acceptable.

Summary

Federated Farmers supports the proposal for reassessment in order to align targets and standards with existing feasible and proven options.

SUBMISSION ENDS

¹³ For example, "Consideration of environmental fate and ecotoxicity data available since NZ EPA reassessment of methyl bromide in 2009" and "Review the 6 and 8 Classifications contained in Dr Martin Edwards' report; Appendix D of the ERMA Chief Executive Reassessment of Methyl Bromide.