



29 August 2019

Decision-Making Committee  
 EPA New Zealand  
 PO Box 57106, Mana  
 Wellington, 5247, New Zealand  
 reassessments@epa.govt.nz

Dear Decision-Making Committee members,

please find below a submission from New Forests Asset Management Pty Ltd, on behalf of Wairarapa Estate Limited, Norsewood Estate Limited, Blenheim Estate Limited, Marberry Estate Limited, Taupo Estate Limited and Southland Estate Limited to the REASSESSMENT OF METHYL BROMIDE APPLICATION NUMBER AP203660 (<https://www.epa.govt.nz/public-consultations/open-consultations/reassessment-of-methyl-bromide/>).

We appreciate the opportunity to have input and commend the EPA on the quality of materials and guidance related to the reassessment.

Over the past five years New Forests Asset Management Pty Ltd (New Forests), on behalf of its institutional investors, have invested over NZD 1 billion in plantation forest and timber processing assets in New Zealand. New Forests managed assets in New Zealand currently export around 1.6 million JASm<sup>3</sup> of export logs per annum from Bluff, Dunedin, Picton, Wellington, Napier, Tauranga and Gisborne earning total sales revenues of around NZD 300 million. The predominant market for New Forests export logs is China with lesser volumes exported to India, Korea and Japan.

As Methyl Bromide is currently the only approved fumigant to meet the importing country phytosanitary requirements for export logs to China (for on deck cargo) and India (for both on-deck and below-deck cargo) its environmentally responsible and safe use is critically important for market access for New Zealand export logs. Not having access to Methyl Bromide would:

- preclude market access of export logs to India;
- result in substantial additional costs for New Zealand exporters to China by way of:
  - debarking costs;
  - shipping costs related to using alternative vessels which would enable 100% of underdeck cargo to be shipped;
  - Methyl Bromide fumigation at discharge ports.
- undermine international investment in the New Zealand forest industry.

New Forests supports industry initiatives lead by STIMBR to identify commercially viable alternatives to Methyl Bromide and to implement recapture technology to reduce Methyl Bromide emissions. In this context New Forests support STIMBR in seeking a modified reassessment of certain controls introduced in the 2010 reassessment as outlined in their application.

In relation to the specific areas of requested information:

**1. adverse effects, especially adverse effects not identified in the application;**

We do not aware of any adverse effects not already identified in the application.

**2. positive effects, especially positive effects not identified in the application.**

In addition to the positive impacts outlined in the application we consider:

- that the continued responsible use of Methyl Bromide under the controls outlined by STIMBR will allow for ongoing adaptation by industry to reduces its reliance on this treatment type and the timely exploration and evaluation of viable alternatives by the EPA and industry, including ethanedinitrile.
- maintaining current market access and export cost structures will help support ongoing international investment in the New Zealand forest industry and ensure that sustainable plantation forestry continues to be a key competitive advantage for the country.

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Matt Crapp  
Director, Operations ANZFF2 and ANZFF3  
New Forests Asset Management Pty Ltd