Environmental Protection Authority
Te Mana Rauhī Taiao

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:	Anthony Green
Organisation name (if on behalf of an organisation):	Mebrom NZ Ltd
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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.

☐ I support the application

☐ I oppose the application

☒ I neither support or oppose the application

The reasons for making my submission are[1]: (further information can be appended to your submission, see footnote).

Mebrom NZ Limited is a supplier of Methyl Bromide to the New Zealand Market.

It is our view that Methyl Bromide is an essential tool in maintaining boarder security against export and import of pest species. To date no single product has shown to have the same effectiveness of Methyl Bromide in the broad spectrum of applications it is used.

Alternative products have been proposed but to date all contain some form of risk and have some compromise in their effectiveness or usage.

Without Methyl Bromide it will be difficult to maintain a viable log export market.

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:

We believe the objective of full Methyl Bromide recovery and or distruction after fumigation is a noble objective, but in reality the evidence presented to date does not support the ability to achieve this objective in all usage areas. To date the best available technology presented in real world usage can get to an 80% recovery of head space Methyl Bromide prior to venting for log stacks, and when ship hulls are considered no equipment has shown any realistic objective of recovering sizable amounts of Methyl Bromide.

Methyl Bromide use for QPS applications is currently an unrestricted use for Methyl Bromide, and is seen as an essential boarder control method. We do not the see any potential for relaxation of international boarder protection, to lessen the demands of fumigation of products by either New Zealand or our trading partners, rather we see an increasing demand for fumigation. Thus if we stay with the current requirements to recapture all of the fumigation gas we will have two alternatives.

a) We push the fumigation of products to off shore juristictions. This will have nil effect on the amount of Methyl Bromide going into the environment as no other jusitictions have regulations requiring this level of recapture. It is also dependent on the foreign juristictions accepting the risk of the pests being released into their environment prior to fumigation. Noting that where there is a risk of pests getting into the New Zealand environment, we are pushing the fumigation responsibility back to the exporting country - eg Marmorated Stink Bug.

b) We stop the exportation of logs. This would have a significant impact on our economy.

We believe there has been significant progress made on Methyl Bromide recovery, and there appears to be technology that

[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.

is starting to realisticly approach the full recovery in log stacks, and we feel that this will be commercially available in the next year or so ahead. We do not feel that giving the freedom to not recover from the the ships hulls is a good idea, as in all likelyhood all logs will be end up being fumigated in the ship's hull negating all attempts to reduce the amount of Methyl Bromide going to atmosphere above levels that can currently be recovered. If we have to do some of the fumigation in the ships hull then maybe the amount could be limited to a certain percentage, or base on the level of 2017 or the last three year average of logs that were fumigated in the ships hull. Alternatively all logs could be fumigated on land to comply with the 80% recovery level.

By alowing the relaxaction of Methyl Bromide recovery to 80% of the orginal head space, we will also enable the continued use of the Methyl Bromide for the vital QPS function. This will also allow the ongoing investment to continue to in develop of recovery technology.

Based on the above our position is:

1. We support the relaxaction of recovery on log stacks to 80% of the orginal head space amout.

2. We do not support a move to zero recovery of fumigation of ships hulls as we believe this will lead to all log fumigation being done in the ships hull, thus negating any efforts to recover Methyl Bromide, it is also likely to slow the development of recovery technology as fumigation in ships hulls will then become the most cost effective technique.