



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:	APP203465
Name of submitter or contact for joint submission:	Nicholas Mark Self
Organisation name (if on behalf of an organisation):	Genera Limited
Postal address:	<p>██████████</p> <p>████████████████████</p> <p>██████</p>
Telephone number:	██████████
Email:	████████████████████

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).

I represent Genera Limited, a biosecurity treatment provider and significant user of methyl bromide. Methyl Bromide is a critical tool in our biosecurity armoury and an essential phytosanitary treatment for many exports.

Genera has looked at, deployed, bought, or used every available alternative biosecurity treatment. We have alternate treatments in place for most of our work, without these methyl bromide use would be >500% of current.

Genera has looked at, visited facilities, bought, trialled all available recapture equipment that we could find worldwide. In the absence of suitable technology Genera has developed and deployed what is the best available technology.

The technical analysis provided by STIMBR is accurate and well supported by credible data.

Genera asserts strongly that recapture targets must be based on sound science, without this rigorous process, any targets become idealistic and not technically feasible. Should these be enforced the industries that we service will be significantly damaged.

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:

That the definition of effective recapture be defined as achieving removal of 75% of methyl bromide available in the headspace at the end of fumigation.

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.