



Environmental Protection Authority

Modified Reassessment of Methyl Bromide

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Environmental Protection Authority's Modified Reassessment of Methyl Bromide.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

Background

4. NMH employs Statutory Officers of the Ministry of Health (Medical Officers of Health and Health Protection Officers). Some of these Officers are also Enforcement Officers under the Hazardous Substances and New Organisms (HSNO) Act 1996.
5. In May 2010 the Public Health Service (PHS) of Nelson Marlborough Health made a submission and then subsequently presented a further submission to the ERMENZ (now EPA) Decision Making Committee on the full reassessment of methyl bromide.
6. The PHS has a role to protect public health. In making this submission the PHS is mindful of the purpose of the HSNO Act (Section 4) to protect the environment, and the health and safety of people and communities, its recognition of the precautionary approach (Section 7) and the duty (Section 97) imposed on the Ministry of Health to ensure that the provisions of the Act are enforced where it is necessary to protect public health.
7. At high exposures methyl bromide can be fatal and cause irreversible neurological damage. At lower levels of exposure, there remains significant gaps in knowledge about the overall effects on humans, therefore a precautionary approach should be taken.
8. NMH notes that methyl bromide is a known ozone-depleting substance, and under the Montreal Protocol New Zealand has an obligation to phase out its use, and where it is used to maximise its recapture during phase-out.
9. In our 2010 submission the PHS supported the following:
 - (i) Continued work on up scaling the recapture technology for log fumigations.

- (ii) Supported efforts to minimise release of methyl bromide to the atmosphere particularly given its effects on the ozone layer and consequent health effects resulting from increased solar UV exposure.

And recommended that:

- (i) An end point (5 years) for the release of methyl bromide to the atmosphere.

10. NMH again raises the above issues in this submission as it appears to NMH that progress has been slow around these matters, which are addressed below.

Specific Comments

I. An end point (5 years) for the release of methyl bromide to the atmosphere

11. NMH notes that "*Grounds to reassess were granted based on data that evidenced New Zealand's use of the fumigant has increased from over 400 tonnes a year in 2010, to more than 600 tonnes in 2016*".

12. NMH's 2010 recommendation for a 5 year end point to phase out methyl bromide was not accepted and rather 10 years was agreed by the EPA. NMH is very concerned that New Zealand, rather than reducing the use of methyl bromide, has seen a large and continuing increase in the quantity of methyl bromide used since 2010.

13. NMH **does not support** an extended period of 10 years. In effect this would be a total of 20 years for the phase out if the original period is included. Given the health effects of exposure, NMH **recommends** there is no further extension.

II. Supports efforts to minimise release of methyl bromide to the atmosphere

14. The application provides other options for QPS, and to protect human health. NMH **supports** urgent further work on other options, especially Ethanedinitrile (EDN) as a phytosanitary fumigant with the potential to greatly reduce methyl bromide use.

15. The applicant proposes the definition of recapture technology be revised to reflect the highest practical level of recapture, such as: "*Recapture technology is a system that mitigates methyl bromide emissions from fumigation enclosures such that the*

residual level of methyl bromide in the enclosed space is at least 80% less than that at the end of the fumigation period."

16. Furthermore the applicant has proposed that fumigation companies should no longer be required to achieve a 5ppm concentration of methyl bromide in the head-space of the covers before venting the gas to the atmosphere.

17. NMH **opposes** changing the recapture technology definition and also **opposes** increasing the concentration on the grounds that it will not reduce or minimise the risk to human health and the environment.

18. In addition to the issues being considered, the application states that lower concentrations of methyl bromide can achieve the QPS outcomes just as effectively as higher concentrations of the fumigant which would lead to major reduction of the pollution of methyl bromide released in the atmosphere.

III. Continued work on upscaling the recapture technology for log fumigations

19. The applicant states that there is currently no technology or infrastructure available to undertake recapture when fumigation takes place in a ship's hold.

20. The applicant also states that as the current recapture requirements will not be achievable by the date at which they come into effect, there will be a significant impact on the ability to fumigate imports and exports and that there will therefore be a significant cost to the associated industries.

21. In addition the applicant proposes *"the deadline for recapture technology be limited to on-port and container fumigations only, and a new deadline of a further 10 years be imposed on ship-hold fumigations"*.

22. If approved, the above proposal would mean recapture of methyl bromide in ship-holds would take effect 20 years after the date of this approval, and 10 years after the date of this approval for all other fumigations.

23. Given the industry has had 10 years to address the capture of methyl bromide, NMH **opposes** any further delay in meeting the original conditions due to the risk on human health and the environment.

Conclusion

1. NMH thanks the Environmental Protection Authority for the opportunity to comment on the Modified Reassessment of Methyl Bromide.
2. NMH **does not wish to be heard** in support of its submission.

Yours sincerely



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