

From: Nicole@nicolesmith.co.nz
Sent: Thursday, 29 August 2019 3:38 PM
To: Reassessments
Subject: Methyl bromide reassessment 2019 - Submission

Categories: Copied to SharePoint

Regarding the Reassessment of Methyl Bromide, as a highly concerned resident and mother of children at a local school, I object to any extension to the 2020 deadline as set out by the EPA in 2010.

STIMBR is seeking a section 63A modified reassessment to provide clarity regarding the current controls, specifically to reassess the feasibility of recapture technology and refine the controls to:

- * require recapture of 80% of methyl bromide remaining at the end of fumigations
- * extend by 10 years the deadline for achieving recapture from ship hold fumigations, and
- * make related refinements to strengthen buffer zone requirements at the completion of recapture.

I note that the third bullet point is not being considered by the EPA in relation to this application for reassessment as: “Buffer zones and many other workplace controls are now set in Part 14 of the Health and Safety at Work (Hazardous Substances) Regulations, rather than in the HSNO approval for methyl bromide.”

The 2020 deadline set in 2010 allowed the industry participants, as represented by STIMBR, time to find ways of reorganising their businesses and finding means of developing recapture technology so that they could meet the requirements set by the EPA in 2010. The fact that the industry has failed to do so, does not mean that they industry should simply be granted a further extension of the deadline (or a change to the amount required to be recaptured). The fact that industry participants have not focussed their efforts on finding a means of achieving recapture (at what they consider to be an acceptable cost) is not a reason to extend the deadline. After failing to focus on the issue themselves, STIMBR and the industry participants they represent handed the problem over to Genera. The fact that the solution developed by Genera has not been “scaled” is due to a lack of focus and desire on the part of STIMBR and the industry to find and fund a solution, hoping that they can avoid the need to eat into profits, by simply asking for more time (and reduced recapture requirements) from the EPA.

Nor has STIMBR tried to find a means of fumigation (and recapture) that can occur away from populated areas. It appears that it is easier and more cost-effective for fumigation to occur at the Port; and that is therefore what they want to continue to do.

It is incomprehensible that STIMBR claims that “The adverse effects of the proposed changes on the environment and human health are expected to be minimal”. Methyl Bromide is a poison, with considerable adverse health effects and it is an ozone depleting substance. It must be treated with caution and the EPA set requirements for its recapture that must be complied with. The science behind the 2010 decision has not changed.

I have read the STIMBR application and I don't believe enough research has been carried out on the health effects on the local population here in Mt Maunganui and I remain highly concerned about its continued use so close to a windy residential area. STIMBR is asking that Genera and its customers be allowed to continue the following practice at the Port of Tauranga:

“Methyl bromide is injected into the ship hold. The hold is sealed for the required fumigation period and, when the fumigation is completed, the covers are raised and the hold is ventilated for between 6-12 hours at the berth and under approved safe operating procedures until the

fumigator declares that the fumigation is completed. The ship is then free to sail.”

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The prevailing wind in Tauranga is from the west. The fumigants released are therefore pushed over to the residences and schools in the Mount Maunganui area. STIMBR and Genera (and its customers) have not presented any research to establish that “the adverse effects” of such conduct are “minimal”.

I don't believe the current techniques and controls are providing workers, residents and the environment with enough safety from this highly toxic substance.

- * I call for the controls set by the EPA in 2010 be adhered to.
- * I wish to be assured that there are even tighter requirements for monitoring due to the highly toxic nature of this product and that Genera is complying with all discharge consent requirements. Industry should foot the bill on the extra monitoring, not ratepayers!
- * I want to see methyl bromide use reduced as it damages the ozone layer.
- * I am highly concerned at the conflict of interest of STIMBR – a research organization funded by Forestry and clearly a lobby group for the continued use of this product.
- * I want it to be noted local residents are extremely concerned about Methyl Bromide use – we feel industry pressure and profits are considered above public health and that is not acceptable.

Tauranga is now a large residential area with many schools and a Marae within 1 kilometre of the Port. The industry has had 10 years to get this in place. PLEASE DO NOT GIVE THEM MORE TIME.

In accordance with section 60 of the Hazardous Substances and New Organisms Act 1996, I wish to be heard on my submission.

Thank you for your consideration.

Nicole Smith

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