

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:	Ian Shapland
Organisation name (if on behalf of an organisation):	NZ Forest Managers Ltd
Postal address:	██████████ ██████████
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.

- 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).

NZ Forest Managers Ltd (NZFM) is a privately owned company established in 1989. We are a specialised contract forest management organisation that provides commercial forest owners with a comprehensive management service covering the full range of operations from forest development, protection and investment through to harvesting and marketing. NZFM is located in Turangi and employs approximately 25 salaried staff and has a total workforce of up to 300 people across all forest activities.

NZFM manages approximately 56,000 hectares of exotic plantation forest. We undertake the commercial harvest and marketing of up to 1 million m³ of logs per annum, realising around \$120-130 M NZD in revenue for our clients. One third of the harvested volume is exported, while the remaining two thirds is sold to domestic customers.

NZFM trades in forest produce on the client's behalf only and as a contractor to long-term clients it is our responsibility to maximise the financial returns for our clients. Exporting logs is important to our business and the ability to export to China and India will be severely compromised if amendments are not made to the controls that allow the use of methyl bromide in NZ, due to take effect from the 28th of October 2020.

NZFM supports the amendments proposed by the applicant to the controls for the use of methyl bromide. Specifically NZFM supports:

1. An amendment to the recapture definition so that it reflects the highest practical level of recapture possible by current technology, rather than requiring the recapture volume to be less than the worker exposure standard (5ppm). This amendment to the controls aligns with a science based approach, which currently means that 80% of methyl bromide remaining in the headspace at the end of a fumigation period can be recaptured. This is the maximum ability of current technology.

The current control level of 5ppm cannot be achieved by any current technologies and, as such, if this limit remains in the controls, methyl bromide fumigation will not be able to be carried out at the ports and therefore NZFM will no longer be able to export logs to India. NZFM currently exports 75,000 m³ of logs to India, at a return of \$15M NZD annually. The financial return of logs exported to China will also significantly decline without an amendment to the current recapture requirement.

2. That the deadline for recapture technology (October 2020) be limited to on-port and container fumigations only, with a new deadline 10-year deadline established for ship-hold fumigations.

Recapture of methyl bromide cannot currently be carried out in the ship-hold as yet. Establishing a new 10-year deadline will allow for technology to continue to be developed to undertake this activity and meet the required controls. A significant volume of logs of exported material is fumigated in ship-holds and developing recapture systems in these situations poses additional challenges. More time is needed to develop these recapture systems but while these are being developed, it is essential that ship-hold fumigations are able to continue in order to facilitate the export of significant volumes of forest products from NZ.

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.

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3. That buffer zone requirements are updated to reflect the applicant's proposed recapture definition. The modelling undertaken by the applicant adequately supports this.

 4. An additional extension to the October 2020 deadline to allow for the installation of technology that will comply with the recapture requirement. Implementing the necessary changes to meet the controls for the use of methyl bromide will take some time and to allow for this, without a disruption to log export operations, extending the deadline to a date that is 12 months from the release date of EPA's decision on the modified reassessment, is supported.

It is important to note that despite the research into alternatives that has been undertaken since 2010 there is not currently any viable alternative fumigant available for the export of forest products from NZ. If the controls for methyl bromide are not reassessed as proposed by the applicant, there will be a significant impact to NZFM and the wider NZ forest industry. Log exports to India will cease and the financial returns to the forest owner from other export markets will experience a significant financial decline.

As an independent contractor exporting forest products on behalf of its clients, NZFM considers the application for the reassessment of controls for the use of methyl bromide (APP203660) to be essential to our ability to market exotic plantation logs to India and China, which currently rely on the use of methyl bromide or phosphine for phytosanitary treatment.

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:

NZFM supports application APP203660 as written, for the reasons outlined above. It is essential to NZFM's export commitments that the EPA sets workable controls for the use of methyl bromide in NZ.

NZFM submits that the amendments proposed by the applicant to the controls in the reassessment of the HSNO approval of methyl bromide are accepted and implemented as outlined within the application.
