

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:	AP203660
Name of submitter or contact for joint submission:	Philip Taylor
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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 are¹: (further information can be appended to your submission, see footnote).

See document attached

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:

Approve the extension of the use of MBr for the fumigation treatment of logs

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.

Submission by Port Blakely Ltd

Port Blakely wishes to be heard in support of this submission

29th August 2019

To
EPA New Zealand
PO Box 131
Wellington 6140

Application for the Reassessment of Methyl Bromide

Application Number: AP203660

Port Blakely exports in excess of 600,000m³ of logs into international markets. For the bulk of this volume there are no domestic processing alternatives to exporting these logs due to regional location of forests, lack of scale and absence of domestic processing facilities within the majority of the regions in which Port Blakely owns forests.

Port Blakely owns and operates approximately 35,000ha of plantation forests in both the north and south islands of New Zealand. Port Blakely directly employs 21 fulltime staff and up to 150 harvest and transport contractors plus associated service providers in rural New Zealand. The ability to export logs through an efficient [cost effective] and safe supply chain is key to the sustainability of its business and employment of its people.

Port Blakely is constantly facing cost pressures through out its business and the removal of the option to treat export logs using MBr is but one of many of the increasing regulatory costs it faces. As mentioned later in this submission, Port Blakely is committed to environmental sustainability and safe operating conditions for its workers. However, it needs time to implement replacements for MBr fumigation and respectfully submits that a reassessment of the recapture requirements, both in terms of quantum and timing, will give it time to find replacements.

Growth in key export markets such as China and India are vitally important for Port Blakely and for the NZ log export trade in general. These two countries alone in 2019 consumed over 70% of NZ's log exports. Both China and India have unique Importing Country Phytosanitary Requirements (ICPRs) requiring logs to be fumigated with Methyl Bromide (MB) in NZ.

Unless alternative fumigants or processes which provide viable phytosanitary treatments can be commercialised (in conjunction with the Chinese and Indian government acceptance), the ability to have continued access to Methyl Bromide as a quarantine treatment is imperative.

Log exporters, including Port Blakely, are committed to supporting reduced Methyl Bromide use (where alternative options are available) and reducing MB emissions through applying recapture technology to assist with meeting the New Zealand Montreal Protocol obligations and general industry 'licence to operate' objectives.

Port Blakely provides funding to STIMBR through the export log levy and provides significant funding to support the development of;

- Effective phytosanitary alternatives
- Registration of fumigant alternatives as replacements for Methyl Bromide

- Reductions to Methyl Bromide emissions through ongoing development of recapture technology for “large” log scale fumigations.

Port Blakely support STIMBR in seeking a modified reassessment of certain controls introduced in the 2010 reassessment namely (refer application);

1. The definition of recapture technology be revised to reflect the highest practicable 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.”*
2. 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, such as by amending clause 13(1) to state: *“Clause 13(2) takes effect 20 years after the date of this approval in relation to ship hold fumigations, and 10 years after the date of this approval for all other fumigations”*
3. A change to clause 6(5), if buffer zones are to be kept, such that any refinement to the data collection requirements under clause 2 reflect the realities of a discharge of <20% of residual methyl bromide.

Port Blakely supports the STIMBR application and requests the EPA to:

1. Amend the current recapture definition.
2. Provide clarity regarding the recapture monitoring requirements and that these are to be physically achievable based on science for large scale (log stack) fumigations and available technologies.
3. Change to levels to recapture 80% of the MB remaining at the end of the fumigation.
4. Extend the deadline October 2020 by one year to implement necessary recapture infrastructure in Tauranga, Napier and Northport to the proposed 80% standard.
5. Differentiate *“In hold”* recapture and request further extension to the recapture timelines for *“in hold”* fumigations to allow for further development and scalability of recapture technology.
6. Modify Buffer Zones to reflect recapture controls.
7. Ensure that MB with appropriate recapture technology remains in the biosecurity toolbox until alternative fumigants or processes are commercialised for all parities required to fumigate for phytosanitary and biosecurity purposes.

In Port Blakely’s view, the wider industry needs MB in the phytosanitary toolbox with reasonable workable controls for the following reasons:

- Ethanedinitrile (EDN).
EDN is the one alternative fumigant for MB that is currently being considered by the Environmental Protection Authority (EPA) for registration for use in NZ. It is unknown if, or when this product will be available to be used as a “drop in” replacement for both “on shore” and “in hold” MB fumigations. TPT request urgency from the Worksafe and EPA approval processes to ensure market access is not disrupted by the removal of MB without an alternative such as EDN being approved. At this stage TPT are not

confident that EDN will be commercially available as a phytosanitary treatment by October 2020.

- India
MB is currently the only fumigation accepted by India and is required for “on board” and “on shore” fumigation due to no alternatives being accepted (by Indian Authorities) or available (registered e.g. EDN). It is critical to maintain India as an export log market, in particular as India typically consumes lower grade consignments and some regions (e.g. Northland) requires channels for these export grades due to not having domestic processing options (pulp mills).
- Japan and Korea
While both Japan and Korea currently permit MB treatment on arrival, like New Zealand and many other countries they could demand that products are treated in the country of origin before export, and as well no longer accept MB as a phytosanitary treatment.
- Debarking.
Whilst currently accepted as a control (risk mitigation) for China it is not an accepted “phytosanitary” treatment and therefore at any stage if deemed to not meet the phytosanitary requirements (by MPI or China) the logs are required to be fumigated. Debarking is a partial solution only suited for high end quality logs produced from high volume production sites. Of note, debarking is not even considered a ‘control’ in India, and all logs currently still require MB fumigation even if debarked.
- Recapture technology.
Large scale “log stack” fumigation recapture has been developing since 2010 with significant learnings on destruction and reuse options developed. Recapture technology is in use. Significant investment has been committed by industry parties, and if that recapture technology is deemed to not meet the standard if the definition for MB recapture is not modified with a “sunk cost” and the technology redundant.

Export log volumes will significantly reduce if MB was unable to be used for QPS requirements. This will have significant adverse effects on the forestry industry, asset values and the wider NZ market economy. Exports to India will cease until an alternative is and exports to China significantly impacted with costs to market increasing.

Of note, export markets utilize specific grades, lengths and quality characteristics that cannot be processed in the NZ domestic market (due to processing capacity and quality of fibre required by domestic processors). If NZ export log volumes were to decline as a result of fumigation restrictions (acceptable fumigant options and cost) the NZ total harvest levels will also decline therefore dramatically reducing the volume available for the domestic processing sector.

Port Blakley wishes to appear and be heard in support of this submission.

Philip Taylor
Managing Director

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