

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:	Tim Charleson
Organisation name (if on behalf of an organisation):	Red Stag Timber Ltd
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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).

Red Stag Timber is the biggest sawmill site in the southern hemisphere and biggest provide employer in Rotorua with a fulltime staff of 300 and about 50 fulltime contractors.

Currently about 45% of our sawn timber is exported to a total of 13 countries.

At present most countries we export to do not require routine methyl bromide fumigation on dried or green product and consequently only a small amount of product is currently fumigated requiring 3.2 tonnes of methyl bromide in 2018. This equates to about 40,000 m3 of sawn timber fumigated.

This however could change at any time at the behest of any importing country, especially for green timber.

Red Stag Timber supports the application seeking a modified reassessment of methyl bromide in order to enable the continued use of methyl bromide for the following reasons.

1. The current recapture standard requires a methyl bromide concentration in the headspace of less than 5 ppm at the end of the recapture period. Achieving this reduction with current commercial technologies is unrealistic and cannot be achieved. The science and justification behind the derivation of the 5 ppm figure is highly questionable. We therefore support the more realistic refinement that 80% of the methyl bromide remaining at the end of the fumigation is recaptured.

2. We also support the proposed refinement that the October 2020 deadline for recapture on ship hold fumigations is extended by 10 years given that there are currently there are no technologies that can efficiently recapture 80% of the methyl bromide present at the end of ship-hold fumigation. Ship-hold recapture is significantly more difficult than container or under-tarpaulin fumigation.

3. Lastly we believe that a time extension to achieve the proposed 80% recapture standard for non-ship-hold fumigation is essential. The current date of October 2020 will not be achievable and it is submitted that a reasonable timeframe to meet the proposed standard should be at least 12 months following the EPA's decision on the modified reassessment. This will allow time to install technology to comply given the certainty of a realistic recapture standard.

In summary the removal of methyl bromide as a fumigant which will occur in the event that the recapture rate is not modified, will, in the absence of a suitable alternative, result in the loss of the markets we currently export to that require this treatment and potentially other markets in the future that may request this treatment. In the case of the latter scenario the financial consequences to our business could be significant to the extent that the financial viability of mill would be threatened.

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.

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:

1. To modify the recapture requirement from less than 5 ppm in the headspace on completion to recapture of 80% of the remaining methyl bromide in the headspace at the end of the fumigation period.
 2. To extend the deadline for the recapture from ship-holds until 2030
 3. To grant a time extension of at least 12 months to the current deadline of October 2020 following the reassessment decision in order to install the necessary equipment to meet the new limit.
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