

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:	APP2003660
Name of submitter or contact for joint submission:	Duncan Park
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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).

About T&G Global Limited (T&G)

T&G employs 1,300+ permanent employees globally and more than 700 season workers during peak harvest periods. We are a NZD\$1.2b company who, together with our partner growers, grow, store, market, and distribute a significant basket of fresh produce including Apples, Grapes, Kiwifruit, as well as many others. T&G produce is available in over 20 countries globally. T&G packs, cools, and stores fresh produce through an extensive network of facilities around the globe. We have 253,000m² of storage facilities in NZ alone. Our core company goal is to grow healthier futures through fresh fruit and vegetables by being the world's leading premium fresh produce company.

To fully realise our core company goal we need to work within global market access protocols. As part of this we must ensure biosecurity is maintained, work closely with government agencies, e.g. MPI, to develop meaningful access, while producing fresh, healthy, and edible products.

Specifically referencing the Methyl Bromide submission, T&G would like to address two issues -

- 1) Apples to Japan
- 2) Import / export biosecurity management.

1) Apples to Japan

In 2008 T&G re-established the apples to Japan protocol. A central part of this was having a Japan MAFF resource working alongside our staff to successfully get one container (1176 cartons) of apples loaded. The protocol is based around prevention of Codling Moth entering the Japanese environment. Prevention is achieved via on orchard and post harvest technologies (to be discussed in the systems approach). The protocol subsequently centers around a methyl bromide fumigation at 24gm per cubic meter, for two hours at fruit pulp temperatures above 12 degrees Celsius. T&G have successfully carried out this programme since 2008. During this time, the programme has grown from 1,000 cartons annually to 157,000 cartons in 2019. Current expansion planned through to 2024 forecasts 304,000 cartons, equating to 15% year on year growth with our Japanese partners. These are T&G specific volumes and we appreciate other exporters are also exporting to the Japan programme through the same protocol. Looking from a financial value perspective, this represents NZD\$9.2m in 2019, growing to NZD\$19.9m in 2024. We also benefit from the CPTPP tariff breaks established with Japan. These tariff breaks have already added NZ\$3-4 dollars return to grower. Any loss of the Methyl Bromide treatment, as required by the Japanese government protocol, without sensible recapture puts an instantaneous stop to this programme in October 2020. A valuable export market for our established brands Jazz™, Envy™, and Pacific Queen™, which are NZ bred varieties, will be lost overnight.

What we are doing about this

A) T&G worked with NZAPI, Genera, and other exporters in May to undertake recapture trials at T&G facilities. The trials proved that we could recapture 80% of the post treatment concentration of Methyl Bromide. This would be achieved within a time frame that would not compromise the fruit quality due to prolonged exposure to Methyl Bromide - sorry can't insert the graph showing the recapture - However, the trial also showed that attempting a recapture to 5ppm was not possible, prolonging the fruit to exposure times. Further, current state recapture technology is not sufficiently advanced to achieve recapture to 5ppm and would have an adverse affect on fruit quality. Further trials and learnings will continue in 2020 during the Japan

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.

treatment / export season.

B) T&G are actively working with NZAPI , PFR, and MPI to establish a robust systems approach for apple access to Japan. This is based on orchard advancement via IFP (Intergrated Fruit Production), new science around codling moth control, i.e. SIT (Sterile Insect Technology), SPLAT (a lure & kill for ALCM), Pheromone mating disruption, and improved post harvest technology at packhouse i.e. apple washer. This cumulated in a proposal being tabled with Japan MAFF by MFAT officials earlier this year. We are seeking to develop a working group with Japan to further the development of this systems approach. We see this eventually replacing a Methyl Bromide based protocol and see this as a long term solution, sitting within the 10 year recapture option. Various other studies have been completed on alternative chemical fumigates to Methyl Bromide. However, these treatments are not effective against codling moth in the life stage presented in post harvest. This typically takes the form of larvae that have tunnelled into the flesh of the apple.

Reference

Apples to Japan protocol <https://www.mpi.govt.nz/Security/login?BackURL=dmsdocument%2F2736-apples-to-japan-official-assurance-programme>

2) Import / Export Biosecurity Mangement

T&G imported 28 fresh produce commodities over the 2018 calendar year, including:

- Apples;
- Asparagus;
- Beans;
- Capsicums;
- Cherries;
- Coconuts;
- Courgette;
- Cucumber;
- Grapefruit;
- Ginger;
- Grapes;
- Kiwifruit;
- Lemon;
- Limes;
- Mandarins;
- Melons;
- Mango;
- Minneolas;
- Onions;
- Oranges;
- Pears;
- Plums;
- Pomegranate;
- Pumpkin;
- Rambutan;
- Strawberries;
- Tangelo; and
- Watermelon.

This produce was sourced from countries such as Australia, Chile, Italy, Netherlands, New Caledonia, Mexico, Samoa, Thailand, Tonga, USA, and Vietnam. T&G's imported volumes equated to 688 forty foot containers, worth NZD\$26m in trade. Of these, 30% required fumigation with Methyl Bromide for control of a various range of insects at different life cycle stages.

Methyl Bromide has proven effective in controlling all these insects. This does not include the banana business which is treated with hydrogen cyanide (HCN)

T&G's export business is required to fumigate various traded consignments destined for the Pacific Islands and all containers destined for Fiji. These consignments have a NZD\$5m value annually. Containers (3-4 weekly) are fumigated with Methyl Bromide to achieve full penetration through the product for insect control.

The impact of losing Methyl Bromide would be a direct loss of these imported / exported commodities, worth NZ\$65m in trade annually.

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:

T&G Global wish for the EPA's decision to be in favour of the submission.
