

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:	Lehi Miller
Organisation name (if on behalf of an organisation):	The Fresh Fruit Company of New Zealand
Postal address:	<p>██████████</p> <p>██████████</p> <p>██████████</p>
Telephone number:	██████████
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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).

The Fresh Fruit Company of New Zealand (also known as Freshco) has been involved for many years in the use of Methyl Bromide as a phytosanitary fumigant in the export of apples to the Japan market. In the last three years we have constructed our own fumigation container enclosures at one of our Packhouse/Coolstore facilities located in Whakatu Hastings.

Freshco have made significant investment into developing an extremely important customer base and sales programme in the Japan market and can see huge potential for further growth. It is a critical market for some of our traditional and newer developing varieties in order to maximise our overall global returns. We are committed to ensuring this market remains open to our apples and do not see this market removing their methyl bromide fumigation requirement as a market entry protocol in the short to medium term.

We are not opposed to the progressive move to totally eliminate methyl bromide use as a fumigant as it is well known this substance is hazardous to humans, wildlife and the ozone layer. We are however concerned with the lack of available technology, equipment and expertise to achieve the proposed recapture down to the specified level of 5ppm prior to venting.

We have met with our methyl bromide fumigation service provider (Genera) to discuss their capabilities to meet the 5ppm prior to venting requirement. They have stated that this would take much more than a 1 - 2 hours that we currently take to fumigate our apples for the Japan export programme. Trials undertaken by an Hawkes Bay exporter revealed that the 5ppm prior to venting requirement with current technology could take more than 1 day. If the requirement was reassessed to capture 80% of the fumigate prior to venting the fruit would be available to vent in just under 2 hours.

Our own extensive fruit quality research has shown that if we do not fully vent our enclosures within 1 to 2 hours of the fumigation being completed, we can expect to see fumigation damage to the external and internal part of apples rendering the fruit unsalable. This is exhibited as unsightly burns or scald on the skin surface and sometimes as patches of browning within the flesh of the fruit when cut open. This damage is sometimes not seen until it has been in storage for some time or in some cases it has arrived in the market. If we are to apply the recapture down to 5ppm level prior to venting, our fruit will be subject to far more exposure time to the fumigant and will increase our fruit quality issues significantly. This will then require costly repacking of fruit, losses of fruit volumes, reduced sales and unsatisfied customers.

It is estimated that the use of methyl bromide in the pipfruit industry is less than 2% of total use in New Zealand. It is also important to note that the amount of methyl bromide used in the Japan Apple Export Programme requires a concentration of 24 grams per cubic metre during fumigation, this is a far less concentration than that used by other industries such as the forestry industry in which fumigation is less controllable under tarpaulins/covers.

We therefore firmly support the application to reduce the recapture requirement for methyl bromide to 80% at the end of fumigation.

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:

To reassess the methyl bromide recapture requirements to only require 80% or more of the fumigant to be recaptured before completion of a fumigation cycle. This will ensure fruit is released from fumigation in a suitable timeframe that will not compromise quality and allow Freshco to continue to supply premium quality apples to the Japan Market.
