

# 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](mailto: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.**

<b>Submission on application number:</b>	Reassessment of Methyl Bromide
<b>Name of submitter or contact for joint submission:</b>	Kelly Leonard
<b>Organisation name (if on behalf of an organisation):</b>	Port Nelson Ltd
<b>Postal address:</b>	P.O. Box 844 Nelson
<b>Telephone number:</b>	021439399
<b>Email:</b>	<a href="mailto:Kelly.Leonard@portnelson.co.nz">Kelly.Leonard@portnelson.co.nz</a>

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](http://www.epa.govt.nz). We also may make your submission available in response to a request under the Official Information Act 1982.

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- I support the application
- I oppose the application
- I neither support or oppose the application

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**The reasons for making my submission are<sup>1</sup>: (further information can be appended to your submission, see footnote).**

In recognition of the importance of the export forestry industry to both the Nelson Tasman Region, and wider New Zealand economy, Port Nelson Ltd wish to support the continued export trade of logs from the Nelson Tasman Region, with India, China, and other export markets.

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**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.**

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**I wish for the EPA to make the following decision:**

Port Nelson Ltd supports the reassessment of the definition of recapture technology to one that reflects the highest practicable level of recapture, of 80% or greater (where the greater can be practically achieved). Although Methyl Bromide use at Port Nelson is subject to recapture already (and there is no fumigation of logs), export logs from Port Nelson depend on the ability of fumigation to occur at other Ports.

Port Nelson Ltd also supports a revised deadline for ship-hold fumigation with Methyl Bromide, to a timeframe that enables a suitable alternative to have gone through the appropriate approvals for use. This would ensure continuing trade of forestry products with our export destinations. A suitable timeframe should include giving the industry sufficient time to develop and procure the necessary recapture technology, for recapture to the defined standard.

Port Nelson would not support any change that would inhibit, or restrict trade with our forestry export destinations, or bring significant financial burden to the primary industries (including forestry) of the Nelson Tasman region through the reassessment of the use of Methyl Bromide, at a time where a suitable alternative has not been identified.

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<sup>1</sup> 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.