

# 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>	(APP203660)
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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](http://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 are<sup>1</sup>: (further information can be appended to your submission, see footnote).**

Ernslaw employs a fulltime contract workforce of around 750 people in the regions of NZ, two thirds of whom are involved in log harvesting and cartage, supported by a staff of 55. Our business is critically dependent on our ability to export logs. The economic viability of our export shipments is dependent on our ability to achieve full utilisation of the “handy size” vessels that we charter, which means loading logs fumigated with Methyl Bromide on the above decks with fumigated logs.

We, like others, are caught in a near-perfect Catch-22 situation. Genera, our fumigation service provider, advises that while they have operative recapture technology, they can't ever achieve recapture down to a 5-ppm residual. We understand the capacity to recapture Methyl Bromide from all log stacks to 80% across New Zealand is not currently available. Genera needs to invest in Methyl Bromide recapture technology but will only do so if the recapture target is made less stringent. If an alternative named EDN gets approval, then Genera's current and future investment in recapture technology will result in stranded assets at scale. China reports numerous insect incursions some in cavities and dead knots in debarked logs. India insists on Methyl Bromide, but the NZ government's self-imposed deadline of October 2020 for recapture at a (currently) unattainable level (5ppm) means we cannot deliver after that date. Debarking seems intuitively better, but it is not a recognised phytosanitary treatment.

We understand methyl bromide to be the most efficacious log fumigation agent, effectively setting the gold standard, but equally we understand that methyl bromide is an ozone depleting gas. We further recognise that NZ society is becoming progressively less tolerant of the use of toxic chemicals, so alternatives to fumigation must be found.

Ernslaw currently harvest around 1.4 million tonnes of logs annually from three regions and 5 or 6 ports. Our total exports total around 800,000 tonnes of which about 100,000 tonnes are fumigated on shore. In our Gisborne region we export around 95% of our log harvest, being the full grade mix because of the very limited wood processing capacity in that region. In other regions our superior log grades are supplied to domestic sawmillers with lower grades being exported. Lesser log grades have bigger branches and more imperfections so are more likely to harbour insects. Logs exported from our Otago and Southland forests are of small diameter which makes debarking very costly (there being many more logs per thousand tonne of export volume).

We are advised that the technology currently being used to recapture Methyl Bromide from log stacks in New Zealand is at the leading edge in terms of scale and efficacy but we also recognise that others perceive the use of Methyl Bromide under tarps on ports to be relatively crude (although we are advised otherwise).

We are not confident that debarking of our 'rougner' industrial grade logs is efficacious in summer or will continue to be recognised as acceptable by quarantine officers in our client countries.

We also understand that an alternative fumigant named EDN is under assessment by the EPA, and that this fumigant is also highly efficacious and is not an Ozone depleting gas.

We are further advised that EDN is more toxic than methyl bromide and in certain concentrations can be highly flammable. Therefore, until EDN is approved by both EPA and Worksafe for use in NZ we are not confident it will be a viable replacement for Methyl Bromide.

We further understand that a no-chemical, whole-of-log electrical heat treatment process named '(joule heating)' offers promise but that there are significant scale up issues and the economics are yet to be proven. We are hopeful that we may be able to move away from fumigation within a decade if joule heating technology proves viable and if it is accepted by our

<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.

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trading partners as an acceptable phytosanitary treatment, but at this point joule heating is not a viable alternative to Methyl Bromide.

Ernslaw supports the proposed refinement: 80% of methyl bromide remaining at the end of a fumigation must be recaptured.

Without this change, and with limited alternatives, we expect supply chain costs to increase significantly. This will potentially impact our operations and contractors throughout the supply chain – from the Forest to the Port.

Without this change our ability to export deck cargos out of some ports will be significantly impacted.

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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:**

That the use of methyl bromide under tarpaulins at export ports be permitted (subject to safe work conditions and compliance monitoring and enforcement) for a further 10 years, based upon recapture of 80% of the MeBr remaining at the end of a fumigation.

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