



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:	Rodney Ryder
Organisation name (if on behalf of an organisation):	Laurie Forestry Ltd
Postal address:	<p>██████████</p> <p>██████</p> <p>████</p>
Telephone number:	██████████
Email:	████████████████████

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).

Laurie Forestry (LF) is an independant Forest Management Company providing management and consulting expertise in the wider forestry sector. We provide services from land conversion, forest establishment, silviculture and right through to harvesting and marketing. Through LF harvesting and marketing activities predominantly in the South Island, additional to domestic processor log supply, we export approximately 200,000 JAS per annum of logs to the export markets which is dominated by China and India.

We have 10 direct employees but also employ a range of contractors to undertake work on our behalf. Silviculture contractors, logging contractors, cartage contractors, log marshallers and stevedores with the flow on effect to the wider industries who in turn support them. We estimate there is approximatley an additional 5- 6 people involved in supporting ancillary services for each of those employed by LF.

As a management company we work on behalf of small to medium forest owners who have invested in forestry and are rightfully seeking a return on that investment.

While supplying the export markets we also supply logs to domestic sawmills for processing into lumber/timber products for supply to the domestic market as well export markets.

For log exports, Methyl Bromide is a key phytosanitary fumigant used for exports to both China and India, which we understand these two markets consume approximatley 75% of New Zealand total log export volume. In both these markets, currently fumigation at the New Zealand end is a biosecurity requirement. LF export market mix is similar to the national average and therefore the use of Methyl Bromide for log export to India and China is important to our business, our clients business and those that work for us.

We are aware of the EPA Methyl Bromide reassessment through STIMBR. Finding a solution, to the sector and wider New Zealand community and economy is extremely important. LF underatand there has been a lot of work and research conducted by STIMBR and the FOA on the behalf of the sector, which LF supports through the Levy Trust and to date there have been few alternatives identified to Methly Bromide.

Although there are other markets that accept logs from New Zealand that don't require fumigation here in New Zealand, they are however proprtionaltely small and not easily accessable for all exporters. For example, both Japan and Korea accept untreated (not fumigated) produce which they then treat at point of discharge, However China and India require treatment either before departure (using Methyl Bromide) or in transit inside the ships hold (using Phosphine). India does not accept Phosphine as a phytosanitary treatment and everything needs to be treated with Methyl Bromide at this point. If Methyl Bromide was no longer acceptable and there is not an economic alternative LF would likely be excluded from the Indian market completely unless agreement between New Zealand and Indian Governing bodies, as well would be forced into signiicantly increased shipping costs as China cargo will not longer hae on shore fumigated cargo.If Phosphine was the only available alternative for the china market it would mean that any deck cargo would need to be debarked or ships only loaded under deck. This would add significant costs to shipping to such markets. We estimate the shipping costs would increase by approxiantly 30% if only able to ship under-deck and fumioagte with Phosphine.

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:

The EPA should reassess the use of Methyl Bromide in line with the STIMBR submission in seeking a modified reassessment of certain controls introduced in the 2010 reassessment namely (refer application);

1. The definition of recapture technology be revised to reflect the highest practicable level of recapture, such as; "Recapture technology is a system that mitigates methyl bromide emissions from fumigation enclosures such that the residual level of methyl bromide in the enclosed space is at least 80% less than that at the end of the fumigation period."
 2. The deadline for recapture technology be limited to on-port and container fumigations only, and a new deadline of a further 10 years be imposed on ship-hold fumigations, such as by amending clause 13(1) to state: "Clause 13(2) takes effect 20 years after the date of this approval in relation to ship hold fumigations, and 10 years after the date of this approval for all other fumigations"
 3. A change to clause 6(5), if buffer zones are to be kept, such that any refinement to the data collection requirements under clause 2 reflect the realities of a discharge of <20% of residual methyl bromide.
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