



4 November 2020
New Zealand Environmental Protection Agency
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COMMENTS REGARDING THE APPLICATION FOR A FURTHER WAIVER EXTENSION OF METHYL BROMIDE IN RESPONSE TO DMC DIRECTION AND MINUTE WGT025-20201029 OCTOBER 2020; APPLICATION APP203660

Subject:

The New Zealand Forest Owners Association (FOA) response to the DMC request (WGT025) for comments regarding a further WAIVER extension to 28 October 2021.

Submission:

FOA believes a further waiver extension is warranted. If a further WAIVER extension is withheld NZ Log Exporters will be forced to cease log exports to the Indian log market. The China market is also likely to be impacted.

Granting a further WAIVER extension to 28 October 2021 will not cause any undue prejudice.

Recap of key points:

New Zealand log and timber exporters need an alternative for methyl bromide. However, until approval to use a proven alternative to methyl bromide is received from the Environmental Protection Authority, and trading partners we must have access to methyl bromide. Note The Indian government only permits the use of methyl bromide.

NZ forest product exports to China and India are worth approximately \$2.5 billion annually.

There are currently no alternative fumigant treatments available to meet the importing country phytosanitary requirements for India or China (On "Deck") post 28th April 2021. This will have a significant negative impact on the commercial viability of the total NZ log export program.

International markets are in turmoil from the COVID-19 pandemic. The NZ forest industry was severely impacted in the last year due the level four shut down, a significant price drop and a short-term decline in the China market. Forestry companies need a period of stability without multiple uncertainties to allow some resilience to be restored within the industry.

Without the further waiver approval, log shipments of New Zealand logs to India could cease as early as January/February 2021. Deck cargo for China vessels could cease or be reduced to debarked logs only.

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