



3 November 2020

Tipene Wilson  
Chair Decision-making Committee  
c/ Environmental Protection Authority  
[Reassessments@epa.govt.nz](mailto:Reassessments@epa.govt.nz)

**Submission on the extension of the methyl bromide recapture deadline**

Dear Tipene,

The Ministry for Primary Industries (MPI) supports extending the methyl bromide recapture deadline by 6 months from 28 April 2021 to 28 October 2021 to ensure that industry can have some certainty and continue to function while a decision is reached on the substantive reassessment application.

As identified in MPI's submission in the reassessment process, methyl bromide is a vital phytosanitary treatment for export products to meet the requirements prescribed by overseas country requirements, and as a biosecurity treatment for effective management of pests on imported products. For example, log exports to key markets such as China and India will be affected significantly should a timely decision on the reassessment or the waiver not be made. The Indian market for exports of logs is significant, worth around \$135 million for the 12 months to date July 2020. This market will be most affected as there is no alternative treatment available currently.

As there is ongoing uncertainty around the parameters for fumigation and recapture, MPI agrees with the applicant that at least six months' notice is required once a decision is made to allow time to operationally adjust, obtain necessary equipment and to secure payment from Indian importers, typically on 90 to 180-day payment terms.

MPI supports the application seeking to ensure that methyl bromide requirements remain certain prior to 28 April 2021 and beyond, by extending the recapture deadline by 6 months so a decision on the reassessment can be reached.

Kind regards

A handwritten signature in blue ink that reads 'Shane Olsen'.

Shane Olsen  
Manager Plant Exports