



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:	Craig Wilson
Organisation name (if on behalf of an organisation):	Rentokil-Initial
Postal address:	<p>██████████</p> <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).

Rentokil-Intial is an Approved Treatment Supplier for Methyl Bromide treatments in New Zealand.

We wish to be in attendance at the hearing.

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:

We support the changes proposed by STIMBR to the recapture deadline, as outlined in the 13th Memorandum of Counsel for the Applicant dated the 14th of May 2020, and wish for EPA to make a decision in line with these proposals.

We support this application as there is no obvious prejudice imparted on Exporters, Importers, or the Treatment Suppliers. Instead prejudice would be imparted, and serious impact to New Zealand's export market would occur, where the proposed 6 month waiver is not granted by the DMC.

Further, the recent and continuing impacts of the COVID-19 crisis has reduced the ability of Treatment Suppliers to invest and support the move to mandatory recapture, and may lead to a reduction in the availability of providers to provide mandatory Biosecurity treatments; causing a knock on effect to importers and exporters in New Zealand. The six month waiver as proposed will allow these companies to invest in these technologies.

1