

29 January 2021

New Zealand Environmental Protection Agency  
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**COMMENTS REGARDING THE Todoroski Air Sciences (TAS) Report IN RESPONSE TO DMC DIRECTION AND MINUTE WGT027-2021JANUARY29; APPLICATION APP203660**

**Introduction**

Matariki Forests response to the DMC request for comments regarding the TAS Report

**Submission**

Matariki believes the reasons raised in the original submission, list below are still as valid today and a further waiver extension is warranted. If a further WAIVER extension is withheld Matariki will be forced to cease log exports to the Indian log market.

Matariki believe 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. As a company, Matariki is very concerned methyl bromide may no longer be available for use in the future. Comments:

- The importance of having workable controls for methyl bromide to enable the industry to transition to alternative Phytosanitary treatments and to ensure that methyl bromide remains available as an alternative treatment
- It is understood STIMBR is making a detailed technical submission on behalf of the forest industry exporters
- The five key points in the TAS report (refer p18) where mitigations could help reduce emissions:
  - The number of log stacks/ships holds ventilated per hour; accepting there may need to be controls on the volume of logs that can be vented each hour

during the operational hours of the port where fumigation is occurring (e.g. POT 0700-1900h).

- The initial dose; based on STIMBR research a dose of 40g/m<sup>3</sup> is achievable
- The capture rate (final concentration); Genera, industry's primary fumigator continues to develop and improve recapture technology.
- Wind conditions; various modelling has been prepared and tabled that takes into account the range of meteorological conditions encountered over time. Understanding while a lower wind speed threshold is not needed it would reasonably be expected an upper wind threshold should be required (as it currently the case).
- Distance to nearest receptor location; this is a technical issue and Matariki is unable to comment.

If you have any queries in relation to this submission please contact me on [REDACTED] or email [REDACTED]

Yours sincerely

[REDACTED]

Chris Rayes  
**Marketing Director**

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