



29/01/2021

To the EPA Decision-making Committee (DMC).

Regarding the modified reassessment of methyl bromide and the additional TAS air dispersion modelling.

Application: APP203660 - Direction & Minute WGT029.

Genera consider the controls proposed in the TAS modelling report impractical and encourage the EPA to place a greater reliance on real world monitoring data, rather than theoretical modelling.

There is an abundance of monitoring data collected by both Genera and independent organizations such as WorkSafe which was presented in the recent EPA methyl bromide reassessment hearing. This information shows concentrations at site boundaries are maintained well below the TEL using current buffer zone distances irrespective of windspeed, time of day, log row size and other modelling parameters.

On rare occasions elevated TVOC (Total Volatile Organic Compound) levels have been detected, but this is not directly attributable to methyl bromide which is one of many VOC's present in the port environment. Studies during ventilations have shown the proportion of methyl bromide in TVOC readings is relatively low.

Variables of concern that are factored into the modelling are managed in real time during ventilation. Concentrations around the immediate vicinity are monitored and if conditions are not favourable the ventilation process is slowed or ceased to ensure levels released remain below both the workplace exposure standard (WES) and the TEL. With the increase in wider mitigation strategies such as recapture, debarking, lower application rates of methyl bromide and better monitoring technology the net risk is decreasing and will continue to do so. This further reduces the need to dramatically revise current controls.

Proposed buffer zones and other controls indicated in the TAS modelling report would result in a dramatic reduction in fumigation capacity which would render the majority of logs currently fumigated with Methyl Bromide unable to be exported. This would have a significant financial impact on both the forestry and supporting industries.

Before any firm decisions are made, we feel it is critical that the EPA meet with relevant stakeholders who manage the risk and the supply chain on a daily basis, to fully understand the potential impact of any proposed changes and work collaboratively on a solution grounded by real world data.

Kind Regards,



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