



29 January 2021
New Zealand Environmental Protection Agency
Private Bag 63002
Wellington

Email: Reassessments@epa.govt.nz and submissions@epa.govt.nz

COMMENTS REGARDING THE REASSESSMENT OF METHYL BROMIDE IN RELATION TO DMC DIRECTION AND MINUTE WGT0228 AND WGT0229; APPLICATION APP203660

Subject:

The New Zealand Forest Owners Association (FOA) response to the DMC request (WGT028 and WGT028) for comments on modelling.

Submission:

The FOA would like to thank you for the opportunity to provide comment on this application and for the extension granted in relation to these comments.

The FOA recognises, and strongly supports, the importance of having safe but workable controls for methyl bromide enabling the ongoing use of methyl bromide, while the industry transitions to more environmentally sustainable and economically viable alternative Phytosanitary treatments and to ensure that methyl bromide remains an alternative phytosanitary treatment in the toolbox.

The FOA notes and wishes to highlight the points that Todoroski Air Sciences Pty Ltd (TAS) make on page 18 of their report regarding the potential to make operational adjustments that could be employed to significantly reduce emissions and their potential impacts.

- *"the number of timber log stacks (or ship holds) ventilated per hour"*.

The FOA supports the use of modelling to inform the appropriate controls on the volume of logs that can be vented during the operational hours at the port.

- *"the initial dose"*

The FOA notes that research has determined that a lower rate (i.e., 40g/m³) is possible and effective and that MPI has sought consideration and approval from our major trading partners to apply this lower rate. However, until this is accepted New Zealand will need to continue to follow the current and approved phytosanitary treatment requirements.

- *"the capture rate (or final concentration)"*



Genera has been and remains committed to continuing to develop, evolve and improve recapture technologies. The FOA wishes to note that this is a continual process and that improvements are expected to be made.

- “wind conditions”

The FOA notes that STIMBR has previously supplied air dispersion modelling data that considered the diurnal differences in air dispersion, and that this has identified when venting should be undertaken to ensure that required health standards are met.

- “distance to the nearest receptor location”

In their report TAS noted that:

- “with careful attention to these five key factors [above]the results indicate that it is possible to ventilate log stacks on the dock without excessive risk of impacts on workers or bystanders”.
- “there may be scope for potentially significant reductions in impact if ventilation activities can be adjusted under certain more adverse weather conditions”.
- “Other technical or planning options may also be available to alleviate or minimise the potential risk of impacts”.
- “with attention to the key factors that affect the potential impacts the activity can achieve compliance with the TEL criteria”.

The FOA believes that the fumigating companies and exporters can work to explore and implement the potential mitigations identified by TAS in their report.

Further contextual information

The New Zealand commercial forest industry places a high priority on minimising biosecurity risks to New Zealand and the New Zealand forest industry, it equally places a high priority on ensuring that New Zealand’s products do not pose a biosecurity risk to our trading partners.

New Zealand log and timber exporters need alternatives to 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 that the Indian government only permits the use of methyl bromide as a phytosanitary/quarantine treatment for logs.

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

There are currently no approved alternative fumigant treatments available to meet the importing country phytosanitary requirements for India or China (On “Deck”).



International markets remain in turmoil because of the ongoing COVID-19 pandemic. The NZ forest industry was severely impacted 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. The forestry sector, alongside other primary industry sectors, has been identified as a key contributor to New Zealand's post-Covid economic recovery.

If you have any queries in relation to this submission, please contact me at

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Yours sincerely

Brendan Gould
Biosecurity Manager
Forest Owners Association

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