

To: Environmental Protection Authority
reassessments@epa.govt.nz

Submission on: APP203660 Methyl bromide – An application seeking a reassessment of certain controls

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Submitter:

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1. Introduction

Agcarm welcomes the opportunity to comment on the Application for Reassessment – Methyl bromide – An application seeking a reassessment of certain controls made by the Stakeholders in Methyl Bromide Reduction Inc (STIMBR). Our comments are brief, and are focussed on supporting STIMBR in their request to the EPA for a section 63A modified reassessment as outlined in their application.

2. Submission

- 2.1 Agcarm supports the STIMBR application, specifically the reassessment of the feasibility of recapture technology, with the request to refine the controls to:
 - require recapture of 80% of methyl bromide remaining at the end of fumigations
 - extend by 10 years the deadline for achieving recapture from ship hold fumigations, and
 - make related refinements to strengthen buffer zone requirements at the completion of recapture.
- 2.2 Our understanding is that the 2020 deadline controls set for methyl bromide recapture are untenable, and would place our forestry and horticulture sectors at risk of economic damage. We submit that the EPA work closely with STIMBR and the affected industry sectors to ensure that tenable solutions are developed urgently.
- 2.3 Agcarm observes the delays in decision-making on the product EDN, a methyl bromide alternative. We encourage the EPA to progress the EDN application given the importance of the need in New Zealand for alternative products for treating pests and diseases on exported/imported timber and logs.
- 2.4 At the same time, we submit that the EPA meets its timeline commitments for decision-making on the reassessment of methyl bromide based on statutory requirements as outlined in legislation. Given the 2020 deadline, it is important that an outcome of the reassessment is made by February 2020 in order to have any chance of implementing approved methyl bromide recapture technology by October 2020.

3. About Agcarm

Agcarm is the industry association for manufacturers and suppliers of crop protection and animal health products. For further information and a full list of members, see www.agcarm.co.nz.

Agcarm member products protect public health, improve animal welfare and help environmental management. They:

- Play a pivotal role in growing high yield, sustainable food and fibre products;
- Help supply healthy, nutritional and affordable food;
- Keep New Zealand's agriculture, horticulture and forestry sectors internationally competitive.

Our members are committed to safety, innovation and product stewardship.