



Submission on a notified application

To: ERMA New Zealand
PO Box 131
Wellington 6140

Email submissions@ermanz.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

Submission on application number: HRC08002

Name of submitter or contact for joint submission: Gordon Hosking

Organisation name (if on behalf of an organisation): Stakeholders in Methyl Bromide Reduction Inc.

Postal address: PO Box 169
Mangawhai 0540

Telephone number: 0274 586500

Email: Gordon.hosking@xtra.co.nz

I wish to keep my contact details confidential¹

¹ Keeping your contact details confidential means that your name will appear in our Evaluation and Review report as a submitter but your contact details will not be available to other submitters or the applicant. This means that you will not receive any additional information that is circulated by submitters and the applicant prior to the hearing. However, the additional information will be available for you to view on the day of the hearing. If your submission is requested by another party your contact details will not be displayed on the submission.

The reasons for making my submission are²:

- Yes** I support the application I oppose the application I neither support or oppose the application

STIMBR supports the findings and conclusions of ERMA’s reassessment of methyl bromide. We recognise the lack of an effective replacement for certain applications, in particular the fumigation of logs, and support a vigorous research and development programme seeking environmentally and socially acceptable alternatives to the fumigant. Specifically:

1. The acceptance of scenario 1 (baseline) is in our view the only option, given current progress on replacement strategies and the critical importance of methyl bromide fumigation to our trade in forest produce, and the protection of New Zealand’s natural and productive environment.

2. The requirement for monitoring is supported but consideration should be given to exempting small fumigations (e.g. containers) at normal fumigation rates, and a move to sample monitoring where compliance can be demonstrated. A lower limit of methyl bromide concentration should be set, since “until methyl bromide gas is no longer detectable” is not sensible.

3. The need for urgency in seeking alternative strategies to methyl bromide fumigation is in our view critical as it is clear there is unlikely to be a simple drop-in replacement. STIMBR is actively pursuing such strategies on a number of fronts including; recapture technologies, wider use of alternative fumigants, non-fumigant treatments such as heat, risk management on high risk contamination sites, and quality assurance to eliminate the need for treatments. Progress will only be made on the long term components of this programme (risk management and quality assurance) if significant commitment is made to the biological and ecological research needed to under-pin such strategies.

4. STIMBR recognises the undesirable side effects of continued use of methyl bromide,

² Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.



however, the effect of an outright ban, or even a phase out over 5 years, fails to recognise the magnitude of the task of developing alternative strategies and having them accepted by trading partners. The economic and ecological consequences of not having access to methyl bromide for at least the next 10 years are unacceptable, however, both government and industry must make the investment necessary to show real progress on alternatives early in this time frame.

- Yes 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)

I wish ERMA New Zealand to make the following decision:

Acceptance of Scenario 1 – baseline, with modified monitoring requirements and a strong recommendation for investment in the development of alternative strategies.
