



**BAY OF PLENTY
REGIONAL COUNCIL
TOI MOANA**

Send your submission to reach us by 4.00 pm on Wednesday, 18 April 2018

Submission Number
Office use only

053

Submission Form

Post: The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	or Fax: 0800 884 882	or email: air@boprc.govt.nz
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Submitter Name: Matariki Forests Trading Limited (attention: Chris Rayes)

This is a submission on **Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan**

I ~~could~~ could not gain an advantage in trade competition through this submission. [Delete as required.]

- 1 (a) I ~~am/are not~~ directly affected by an effect of the subject matter of the submission that adversely affects the environment; and
 (b) My submission ~~does/does not~~ relate to trade competition or the effects of trade competition.
 [Delete the entire paragraph if you could not gain an advantage in trade competition through this submission.]
- 2 The details of my submission are in the attached table.
- 3 I wish/do not wish to be heard in support of my submission. [Delete as required.]
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing. [Delete if you would not consider presenting a joint case.]

[Signature of person making submission or person authorised to sign on behalf of person making submission.]
 if you make your submission by electronic means.]

18/04/2018

Date [NOTE: A signature is not required]

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1. I make this submission on behalf of Matariki Forests Trading Limited (MFT), a log exporter based in Auckland. MFT exports logs through a number of ports including the Port of Tauranga.
2. Forestry is an important contributor to assisting in meeting New Zealand's Paris Climate Change commitment to reduce the country's net greenhouse gases to 30 per cent below 2005 levels by 2030.
3. The New Zealand Forest Owner's Association data reports that the plantation forest harvest in 2017 was approximately 33.5 million cubic meters. While domestic consumption accounts for approximately 8-9 million cubic meters of high grade logs [i.e. the lower part of the stem] the surplus must be exported in either log or processed form. Approximately 18.5 million cubic meters of logs were exported in 2017. The value of log exports for the June 2017 year was \$2.7 billion.
4. Forestry makes a significant contribution to the Bay of Plenty economy through both domestic processing and export activities. The log supply from our forests is greater than the local millers and processor needs. Consequently the lower grades of log that cannot be used locally are exported. Export requires the use of phytosanitary treatments including fumigation. Without the ability to export logs the impacts would flow down to our local communities and have significant effects on the region's economy.
5. MFT notes that the EPA is the agency mandated to manage fumigants such as methyl bromide and its alternatives. The EPA has the capacity and expertise to identify and assess risk and to develop appropriate controls to manage the risk associate with substances. The EPA is required to take into account effects on social, economic, safety, and environmental factors.

SUBMISSION POINTS

Page No	Reference	Support/Oppose	Decision Sought	Reason(s) / notes
P147			MFT requests that where methyl bromide recapture technology is used as required by the EPA the BoPRC accepts that the use of methyl bromide is a controlled, non-notified activity.	MFT understand that OPUS recommended to Council in 2015 “..to require resource consents for methyl bromide (as required by current plan), except where recapture technology is used where it would be a controlled, non-notified activity.
P147			MFT considers that recapture / destruction requirements should be determined solely by the EPA. Where the EPA considers that recapture / destruction technologies are not required [i.e. the science does not support the need] the BoPRC will not impose rules requiring the use of recapture technologies.	The EPA is mandated to consider the impacts of hazardous substances and to make informed decisions regarding the controls needed to manage risk. The agency applies the precautionary principle to all that it does. The imposition of further rules if they are to be made must be able to be supported with robust science.
P147			The monitoring results for methyl bromide emissions during fumigation and venting are consistently below the thresholds determined by the EPA. MFT asks that the data is used to inform decisions regarding the buffer distances required by Council. In doing so MFT notes that the distances should be no greater than the buffers set by the EPA.	MFT notes the Envirofume application for consent to fumigate using methyl bromide was not a recapture system but a chimney that pushed the emissions into the air. General, regularly reports the results of its methyl bromide monitoring programme to Council. Log exporters are also briefed regularly. MFT notes that the TEL and WES levels are lower than the EPA determined thresholds.

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P149	7.8.3 Options 3	Qualified Support	<p>MFT seek the adoption of an option, to manage fumigation that is based on;</p> <ol style="list-style-type: none"> 1. General rules within the proposed plan, 2. Regional Policy Statement 3. Draw where appropriate on those provisions of the RMA and HSNO Act that regional councils are bound to while 4. Respecting the expertise and decisions of the Environmental Protection Authority and not imposing greater unwarranted 'protections'. 	<p>MFT's preferred option recognises the expertise of the EPA and the mandate that it has to protect the environment while carefully balancing social, economic, safety, and environmental factors to ensure evidence based decisions. MFT notes that Option 3 acknowledges the expertise of the EPA. That agency has the mandate to protect the environment and to consider social, economic, safety, and environmental factors to make balanced evidence based decisions for New Zealand.</p> <p>The EPA processes require a public submission stage when hazardous substances are assessed. This democratic process provides for scrutiny of the EPA's assessment, risk evaluation (through the application of robust science assessment) for the views of sector and the community to be heard prior to the EPA making its final decision and setting controls.</p>
P150	Option 3		Ditto.	<p>MFT notes the use of the words '<i>less stringent</i>' with regard to Option 3. The provisions of the proposed option 3 are not '<i>less stringent</i>' they are fit for purpose positioning the Air plan where it should be in relation to the legislation and regularly implements.</p>

CONTACT PERSON: Chris Rayes, Marketing Director, Rayonier New Zealand Limited, managers to Matariki Forestry Group email: chris.rayes@rayonier.com
SUBMISSION POINTS

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P151 <i>onward</i>	Effectiveness statements and scores		MFT seeks balanced decisions informed by science rather than those with biased with leading statements, misinformation drawn from the internet, opinion or without the support of sound science.	The assessments of effectiveness in the analyses and the allocated scores in the document are in our opinion incomplete. MFT also considers that the assessments are not objective.
	Costs / benefits		Ditto	MFT considers that more work needs to be done on the costs / benefits.

