

Further Submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Please send your submission to be received by 4:00 pm on 31 July 2018

Further Submission Number
Office use only

FS29

TO: The Chief Executive

Bay of Plenty of Regional Council

PO Box 364

Whakatane 3158

EMAIL:

air@boprc.govt.nz

Name: GENERA LIMITED
[Full name of the person or organisation making the submission]:

This is a further submission in support of or opposition to a submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

1. I do or ~~do not~~ wish to be heard in support of my further submission.
[Delete as required]
2. If others make a similar submission I **would** or ~~would not~~ be prepared to consider presenting a joint case with them at any hearing.
[Delete as required]
3. I am:-
[Please tick one]

a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category.)

a person who has an interest in the proposal that is greater than the interest the general public has. (Specify upon what grounds you come within this category.)

On the following grounds:

GENERA Limited is a significant user of fertilisers including methyl bionide that are essential to the biosecurity and economic security of Bay of Plenty.

Signature [of person making submission or person authorised to sign on behalf of person or organisation making submission.]

A signature is not required if you make your submission by electronic means]

MJ - Mark Self CEO

Address for Service [Provide full postal details]:

Telephone:

Daytime: 07 575 6530

After Hours:

Moatt Hill

Moatt.hill@genera.co.nz

Email:

Contact person [Name & Designation if applicable]:

Note: A copy of your submission must be served on the original submitter within 5 working days after making this further submission

FURTHER SUBMISSION POINTS:

<p>Submission Number [Submission number of original submission as shown in the "Summary of Decisions Requested" report]</p>	<p>Submitter Name [Please state the name and address of the person or organisation making the original submission as shown in the "Summary of Decisions Requested" report]</p>	<p>Section Reference [Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposed plan change]</p>	<p>Support/Oppose</p>	<p>Reasons [State in Summary the nature of your submission giving clear reasons]</p>
<p>17-7</p>	<p>Tauranga Moana Fumigant Action Group</p>	<p>Section 6, 7, 8</p>	<p>Oppose</p>	<p>EPA completed a reassessment of methyl bromide (MB) in 2010. An aspirational MB recapture target of 100% was set. Since that time it has become apparent that 100% recapture of MB is not possible by 2020. Based on learnings gained since 2010, the EPA has recently determined that there are grounds for a reassessment of methyl bromide.</p> <p>The EPA is the agency mandated to assess and set controls for hazardous substances such as methyl bromide. There are currently no other practicable options for the fumigation of top stow logs to China, logs to India and other imported and exported cargos.</p> <p>The value of log exports for the June 2017 year was \$2.7 billion. Currently export requires the use of phytosanitary treatments including fumigation with MB. Without the ability to export logs the impacts would flow down to our local communities and have significant effects on the region's economy.</p> <p>Methyl bromide is also used for treating imported cargo and is the main fumigant used to protect New Zealand's border from pest incursions as mandated under the Biosecurity Act 1993. Without MB as a biosecurity tool MPI's ability to protect local industry from pests (eg, Brown Marmorated Stick Bug) will be put at significant risk.</p> <p>The EPA is the agency mandated to manage fumigants such as methyl bromide and its alternatives.</p>
<p>17-8</p>			<p>Oppose</p>	
<p>19-13</p>	<p>Z Energy, BPod NZ Ltd Mobil Oil NZ Ltd</p>	<p>AQR20</p>	<p>Oppose</p>	<p>EPA completed a reassessment of methyl bromide (MB) in 2010. An aspirational MB recapture target of 100% was set. Since that time it has become apparent that 100% recapture of MB is not possible by 2020. Based on learnings gained since 2010, the EPA has recently determined that there are grounds for a reassessment of methyl bromide.</p> <p>The EPA is the agency mandated to assess and set controls for hazardous substances such as methyl bromide. There are currently no other practicable options for the fumigation of top stow logs to China, logs to India and other imported and exported cargos.</p> <p>The value of log exports for the June 2017 year was \$2.7 billion. Currently export requires the use of phytosanitary treatments including fumigation with MB. Without the ability to export logs the impacts would flow down to our local communities and have significant effects on the region's economy.</p>

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<p>31-9</p>	<p>Tauranga Moana – Te Anawa Ki Takutai Partnership Forum</p>	<p>AQR20</p>	<p>Oppose</p>	<p>EPA completed a reassessment of methyl bromide (MB) in 2010. An aspirational MB recapture target of 100% was set. Since that time it has become apparent that 100% recapture of MB is not possible by 2020. Based on learnings gained since 2010, the EPA has recently determined that there are grounds for a reassessment of methyl bromide.</p> <p>The EPA is the agency mandated to assess and set controls for hazardous substances such as methyl bromide. There are currently no other practicable options for the fumigation of top stow logs to China, logs to India and other imported and exported cargos.</p> <p>The value of log exports for the June 2017 year was \$2.7 billion. Currently export requires the use of phytosanitary treatments including fumigation with MB. Without the ability to export logs the impacts would flow down to our local communities and have significant effects on the region's economy.</p> <p>Methyl bromide is also used for treating imported cargo and is the main fumigant used to protect New Zealand's border from pest incursions as mandated under the Biosecurity Act 1993. Without MB as a biosecurity tool MPI's ability to protect local industry from pests (eg, Brown Marmorated Stick Bug) will be put at significant risk.</p> <p>Genera operated air monitoring practices that comply with EPA and BOPRC regulations.</p>
<p>41-7 41-8</p>	<p>Hancock Forest Management</p>	<p>AQR20</p>	<p>Support</p>	<p>The EPA is the agency mandated to manage fumigants such as methyl bromide and its alternatives. The EPA has recently determined that there are grounds for a reassessment of methyl bromide.</p>

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46-1 46-2 46-3	Draslovka A.S	AQR20 (p. 147)	Support	<p>The EPA is the agency mandated to manage fumigants such as methyl bromide and its alternatives. The EPA has recently determined that there are grounds for a reassessment of methyl bromide.</p>
53-1 53-2 53-3, 4, 5, 6, 7	Matariki Forest Ltd	AQR20 (p. 147)	Support	<p>EPA completed a reassessment of methyl bromide (MB) in 2010. An aspirational MB recapture target of 100% was set. Since that time it has become apparent that 100% recapture of MB is not possible by 2020. Based on learnings gained since 2010, the EPA has recently determined that there are grounds for a reassessment of methyl bromide.</p> <p>The EPA is the agency mandated to assess and set controls for hazardous substances such as methyl bromide. There are currently no other practicable options for the fumigation of top stow logs to China, logs to India and other imported and exported cargos.</p> <p>The value of log exports for the June 2017 year was \$2.7 billion. Currently export requires the use of phytosanitary treatments including fumigation with MB. Without the ability to export logs the impacts would flow down to our local communities and have significant effects on the region's economy.</p> <p>Methyl bromide is also used for treating imported cargo and is the main fumigant used to protect New Zealand's border from pest incursions as mandated under the Biosecurity Act 1993. Without MB as a biosecurity tool MPI's ability to protect local industry from pests (eg, Brown Marmorated Stick Bug) will be put at significant risk.</p>
54-8	Tauranga City Council	AQ\$20 (p. 14)	Oppose	<p>EPA completed a reassessment of methyl bromide (MB) in 2010. An aspirational MB recapture target of 100% was set. Since that time it has become apparent that 100% recapture of MB is not possible by 2020. Based on learnings gained since 2010, the EPA has recently determined that there are grounds for a reassessment of methyl bromide.</p> <p>The EPA is the agency mandated to assess and set controls for hazardous substances such as methyl bromide. There are currently no other practicable options for the fumigation of top stow logs to China, logs to India and other imported and exported cargos.</p> <p>The value of log exports for the June 2017 year was \$2.7 billion. Currently export requires the use of phytosanitary treatments including fumigation with MB. Without the ability to export logs the impacts would flow down to our local communities and have significant effects on the region's economy.</p> <p>Methyl bromide is also used for treating imported cargo and is the main fumigant used to protect New Zealand's border from pest incursions as</p>

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57	STIMBR	AQR20	Support		The EPA is the agency mandated to manage fumigants such as methyl bromide and its alternatives. The EPA has recently determined that there are grounds for a reassessment of methyl bromide.

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58-32	Horticulture NZ	AQP9 Sub pt 24 (AQR20)	Support intent but with modification	EPA completed a reassessment of methyl bromide (MB) in 2010. An aspirational MB recapture target of 100% was set. Since that time it has become apparent that 100% recapture of MB is not possible by 2020. Based on learnings gained since 2010, the EPA has recently determined that there are grounds for a reassessment of methyl bromide. Methyl bromide is also used for treating imported cargo and is the main fumigant used to protect New Zealand's border from pest incursions as mandated under the Biosecurity Act 1993. Without MB as a biosecurity tool MPI's ability to protect local industry from pests (eg, Brown Marmorated Stick Bug) will be put at significant risk. AQ R20 (c) Using methyl bromide without recapture, is a controlled, non-notified activity.
64-1	TPT Forests Ltd	AQR20	Support	EPA completed a reassessment of methyl bromide (MB) in 2010. An aspirational MB recapture target of 100% was set. Since that time it has become apparent that 100% recapture of MB is not possible by 2020. Based on learnings gained since 2010, the EPA has recently determined that there are grounds for a reassessment of methyl bromide. The EPA is the agency mandated to assess and set controls for hazardous substances such as methyl bromide. There are currently no other practicable options for the fumigation of top stow logs to China, logs to India and other imported and exported cargos.

				<p>The value of log exports for the June 2017 year was \$2.7 billion. Currently export requires the use of phytosanitary treatments including fumigation with MB. Without the ability to export logs the impacts would flow down to our local communities and have significant effects on the region's economy.</p> <p>Methyl bromide is also used for treating imported cargo and is the main fumigant used to protect New Zealand's border from pest incursions as mandated under the Biosecurity Act 1993. Without MB as a biosecurity tool MPI's ability to protect local industry from pests (eg, Brown Marmorated Stick Bug) will be put at significant risk.</p>
74-17	BOPRC	Definitions Sensitive activity	Support	It is a sensible and constructive amendment.
71-5	Timberlands Ltd	P14 – AQR20	Support intent but with modification	<p>The EPA is the agency mandated to assess and set controls for hazardous substances such as methyl bromide. There are currently no other practicable options for the fumigation of top stow logs to China, logs to India and other imported and exported cargos.</p> <p>Methyl bromide is also used for treating imported cargo and is the main fumigant used to protect New Zealand's border from pest incursions as mandated under the Biosecurity Act 1993. Without MB as a biosecurity tool MPI's ability to protect local industry from pests (eg, Brown Marmorated Stick Bug) will be put at significant risk.</p> <p>AQ R20 (c) Using methyl bromide without recapture, is a controlled, non-notified activity.</p>

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