

IN THE MATTER OF The Resource Management Act 1991

AND

IN THE MATTER OF Application for resource consent under sections 88 and 124 of the Act, in relation to the proposed re consenting of the discharge of contaminants into air from fumigation at the Port of Tauranga.

BY **GENERA LIMITED**
Applicant

STATEMENT OF EVIDENCE OF MARK PROCTER
ON BEHALF OF PORT BLAKELY LIMITED AND TPT FORESTS LIMITED (SUBMITTER)

29 May 2023

INTRODUCTION

1. My full name is Mark Bayman Procter.
2. I am presenting this submission on behalf of Port Blakely Limited and TPT Forests Limited in support of Genera's resource consent application to discharge to air at the Port of Tauranga as a result of fumigation.
3. I am authorised to give this evidence on behalf of both entities named above.

QUALIFICATIONS AND EXPERIENCE

4. I hold a New Zealand Certificate in Forestry
5. I am a member of the Institute of Directors,
6. I am a registered Log Trader under the Forests Act 1949
7. I have ~39 years' experience in the forestry industry. My experience includes all aspects of forest management, as well 5 years in the Pulp & Paper sector and 20 years in the NZ log export sector including ~7 years from Australia and the USA.
8. I am currently a Board member of Phytos (previously STIMBR).

BACKGROUND

PORT BLAKELY LIMITED

9. Port Blakely Limited (PBL) owns approximately 30,000ha of plantation forests in New Zealand with 20% located in Bay of Plenty and Waikato regions of the North Island, and 80% in the Canterbury and Southland regions of the South Island.
10. Specifically, the North Island assets have a growing harvest profile over the next 3 years with a significant component of this volume destined to export markets requiring the appropriate phytosanitary controls including fumigation.
11. The South Island assets also require a significant component of the volume to be exported from the Ports of Timaru and Dunedin, and therefore having the same requirement to have access to the full suite of phytosanitary controls including fumigation.
12. The outcome of the Genera's consent application could have wider implications on other ports and hence PBL have a wider interest beyond the Port of Tauranga.
13. The ability to access export markets via the Port of Tauranga is critical to PBL's business.

TPT FORESTS LIMITED

14. TPT Forests Limited (TPT) exports from several ports including the Port of Tauranga.
 - (i) Port Blakely is a key client of our Company.

15. Since 1998 TPT has exported approximately 60 million JAS with approximately 30 million JAS of that from the Port of Tauranga.
 - (i) To date we have provided PBL export services for approximately 5.3 million JAS.
16. Key markets have included China, Korea, Japan, India, and SEA.
17. TPT have utilised all the phytosanitary treatments required by our trading partners and approved by NZ regulations. Having a full suite of options has been critical for TPT and our clients in a successful export program over the last 25 years.
18. The outcomes of the Genera consent have wider implications for not only TPT but also the wider industry:
 - (i) there may be Port of Tauranga specific controls requested by the Regional Council that other regions and Ports do not currently require and,
 - (ii) some other regions require vessels to finish loading at the Port of Tauranga and therefore require fumigation capability at the Port of Tauranga.

THE REASON FOR OUR SUBMISSION

19. PBL and TPT recognise Environmental and Health Safety standards are a given and must be met without question. While recognising and achieving these standards, we ask the Commissioners also recognise that New Zealand has had one of the most efficient export supply chains and this is gradually being eroded with increasing compliance and regularity controls. NZ runs the risk of rapidly losing its competitive advantage in the global export log market. Placing additional controls of fumigation at the Port of Tauranga above and beyond existing controls, or at least those now recommended by Genera will continue to reduce NZ's ability to be competitive in the international markets.

International phytosanitary requirements are increasing across the globe and currently the ability to fumigate is one of the limited options NZ has to meet these requirements, and imposing significant additional controls on the fumigation process at the Port of Tauranga will significantly impact PBL's and TPT's business.

PBL AND TPT SUPPORT GENERA'S CONSENT APPLICATION INCLUDING THEIR PROPOSED CHANGES TO CONDITIONS

20. Both PBL and TPT support the resource consent sought by Genera's application, combined with the controls they recommend.
21. The proposal provides for ongoing fumigation as one of the phytosanitary tools available to industry and therefore maintains the ability to access export markets and as well to protect New Zealand's inbound biosecurity requirements.
22. Both PBL and TPT rely on the advice from Phytos and the evidence of Mr.Cressey in determining that these proposed conditions appear entirely appropriate for the protection of public health from exposures associated with fumigation activities at Port of Tauranga.

23. Based on the advice of Phytos and our own review, both PBL and TPT support the proposed changes suggested in Mr Frentz's evidence, Table 1. Assessment of JWS conditions (page 71) and Appendix A. Proposed Conditions (Page 87).

CONCLUSION

24. In my opinion, any adverse environmental effects of the proposal are adequately managed or mitigated, and therefore meet so the objectives and policies of the relevant national and regional stakeholders.
25. The proposal has significant national benefit in that it provides for the ongoing access to export log markets while providing the tools to protect New Zealand's inbound biosecurity.
26. Genera's application and subsequent conditions & controls align with the Environmental Protection Authority's conditions, while providing operational effectiveness to continue with fumigation at that Port of Tauranga.



Mark Procter

Director – TPT Forests