

**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**

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**STATEMENT OF EVIDENCE OF DAN KNEEBONE**  
**ON BEHALF OF Port of Tauranga (SUBMITTER)**

10 May 2023

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## **INTRODUCTION**

1. My full name is Daniel Alexander Kneebone.
2. I am presenting this submission on behalf of Port of Tauranga Limited (POTL) further to the submission in support of the Genera application dated 16 November 2020.
3. My witness statement relates to the submission made by POTL.
4. I am authorised to give this evidence on behalf of POTL.

### **Qualifications and experience**

5. I am the General Manager Property & Infrastructure Manager of Port of Tauranga Limited (POTL). I have held this position since January 2013.
6. I have a Bachelor of Commerce majoring in Valuation and Property Management.
7. POTL is New Zealand's largest and most efficient port, handling in excess of 25 million tonnes of cargo per annum. Genera undertakes fumigation activities at POTL on behalf of POTL customers.

### **Scope of evidence**

8. I provide evidence in relation to the impacts on the POTL if fumigation is not able to continue to be undertaken or continues with controls that impose additional unnecessary restrictions.

## **SUMMARY OF SUBMISSION**

9. POTL are supportive of the Genera application provided suitable controls are placed over the activity and that the activity occurs in accordance with good practice guidelines and regulations to minimise the potential for any human health or environmental impacts. This includes:
  - (a) Recapture in accordance with national standards as determined by EPA.
  - (b) Operations in accordance with relevant rules and regulations including the imposition of appropriate buffer zones.
  - (c) Mitigation measures as outlined in the application documents.
  - (d) Ongoing monitoring of discharges and reporting.

**The reasons for making my submission are:**

- (a) Biosecurity Risk
- (b) Impacts on Trade

**Background**

POTL own the Mount Maunganui and Sulphur Point wharves where the proposed fumigation is to occur. POTL has an environmental responsibility due to its location adjacent to a sensitive harbour and proximity to the community.

The Port values human health above all else. POTL have a number of Port procedures and operating rules that users of the Port must adhere to. This is to ensure the safety of Port workers and ensure strong environmental outcomes.

**Biosecurity:**

Port of Tauranga is licenced under the Biosecurity Act 1993 as a Place of First Arrival (PoFA). As a PoFA, for risk mitigation against unwanted pests, there must be the capability to treat and manage a biosecurity risk on imported cargo.

Treatment options are detailed by Biosecurity New Zealand in a document "Approved Biosecurity Treatments, MPI-ABTRT, 22 March 2023" <https://mpi.govt.nz/dmsdocument/1555-approved-biosecurity-treatments-for-risk-goods>

Fumigation is an important element in the biosecurity toolbox to keep New Zealand protected from overseas pests which may enter through our ports. A biosecurity threat of particular interest in the wider Bay of Plenty is the Brown Marmorated Stink Bug (BMSB). This insect can be found on import containers, machinery and other goods and if it became established would wreak havoc on the kiwifruit industry and the region.

Fumigation at the place of first arrival (the port) is critical to prevent opportunities for pests to escape in transit.

**Impacts on Trade:**

Kiwifruit is a significant export commodity for POTL with 1.8 million tonnes anticipated to be shipped through the port in the current financial year. This represents 13% of POTL total export volume. If the impact of

BMSB on the Bay of Plenty kiwifruit industry was like the experience in Italy, this total trade would be impacted.

Export logs are the single largest commodity moving through POTL. In the current financial year, it is anticipated that approximately 6 million tonnes of logs will be exported through POTL. This represents approximately 22% of POTL's total volume. Of the 6 million tonnes, approximately 85% of this volume is treated with a fumigant, either once loaded in the ship's hold or under tarps on the wharf just prior to loading to meet the phytosanitary requirements of our trading partners. If fumigation is not allowed, or the requirements on Genera so onerous as to make unviable, 20% of POTL current total volume will not be exportable which will have massive economic implications for POTL, forest owners and the associated industry.

**Dan Kneebone**

**May 2023**