

# Submission

On

**Single-dose application of phosphine  
in ship-holds for logs to China.**

Submission to:

**Plant Exports**

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## Introductory Comments

1. The Forest Owners Association Incorporated (FOA) and the New Zealand Farm Forestry Association (FFA) welcomes the opportunity to provide feedback on the Consultation on single-dose application of phosphine in ship-holds for logs to China.

## Summary

2. The FOA and FFA supports amendments as proposed for the Phytosanitary Official Assurance Programme for log Exports (Logs OAP) and the China forestry importing country's phytosanitary requirements (China Forestry ICPR).
3. The FOA and FFA supports the inclusion of the two proposed single-dose phosphine fumigation options.
4. The FOA and FFA supports the change to CT product (100,000ppm/h) as a measure of successful fumigation.
5. The FOA and FFA recommend that MPI consider establishing an implementation review group to consider implementation and operational matters outside of the Logs OAP and China Forestry ICPR.

## Submitters

### The Forest Owners Association (FOA)

6. The FOA is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million of New Zealand's 1.8 million hectares of plantation forests. FOA members account for over 70% of the annual harvest.

### The Farm Forestry Association (FFA)

7. The FFA is the representative membership body for small forest block owner, farmers, foresters, investors, growers and manages, it has a membership of around 1200 with its members owning or managing approximately 100,000 ha across New Zealand. The FFA also ensures that the interests of some 16,000 small forest owners and investors across New Zealand are represented.

## The Plantation Forestry Sector



8. In 2023, the forest growing sector was worth \$6.35 billion in export value, and this is expected to decrease to \$5.81 billion in 2024<sup>1</sup> due to a combination of reduced supply and subdued international markets which are not anticipated to rebound. The sector contributes about \$9 billion toward GDP across its wider supply chain. The Ministry for Primary Industries expects forest product export values to exceed \$9 billion by 2030.<sup>2</sup>
9. Plantation forestry is predominantly a commodity market which means that forest owners are price takers. The profits or returns to forest owners are dependent on a variety of factors, *inter alia*, market conditions, supply and demand dynamics, supply chain costs, etc. Ultimately, the grower's return is the sale price less all the costs incurred in growing and getting the products to the market. This includes insurance premiums where this is available and affordable, and associated levies.
10. Plantation forests play a significant public good role in helping New Zealand meet its net-zero emissions targets by 2050 through carbon sequestration and providing feedstocks to meet growing demand for bioenergy, and for high-value products that offer an alternative to those made from fossil fuels. This vital role is only going to increase in the future.
11. The forestry sector supports the employment of over 40,000 people, investment, and development across New Zealand throughout its supply chain in both urban and rural New Zealand.

### The importance of China as a Trading Partner for NZ Forest Products

12. China is a significant and strategically important trading partner for New Zealand, with primary industry exports to China valued at 17,536M for the year to 31 March 2024 accounting for 33% of all primary industry exports<sup>3</sup>.
13. Export revenue to China accounted for 59% of all exported forest products (\$5.9b), with 91% of log exports (~\$3.1b) going to China<sup>4</sup>, making it a critically important market for the New Zealand forestry sector.

### Feedback

### Log Export Official Assurance programme proposed changes

14. We support the changes as proposed for the Logs OAP.

### China Forestry ICPR - proposed changes

15. We support the changes as presented for the China Forestry ICPR.

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<sup>1</sup> <https://www.mpi.govt.nz/dmsdocument/60526-Situation-and-Outlook-for-Primary-Industries-SOPI-December-2023>

<sup>2</sup> <https://www.mpi.govt.nz/dmsdocument/41319-fit-for-a-better-world-background-analysis-on-export-earnings-in-the-primary-sector>

<sup>3</sup> <https://www.mpi.govt.nz/dmsdocument/62637-Situation-and-Outlook-for-Primary-Industries-SOPI-June-2024>

<sup>4</sup> <https://www.mpi.govt.nz/dmsdocument/62637-Situation-and-Outlook-for-Primary-Industries-SOPI-June-2024>

## **Inclusion of single dose phosphine application as an option In the China Forestry ICPR and Logs OAP**

16. The FOA and FFA supports the proposed inclusion of the two additional single dose fumigation options: 1) cylindered phosphine gas, and 2) solid aluminium phosphide; in addition to the existing options available.
17. The availability of a broader array of fumigation applications that still achieve the same phytosanitary outcomes provides the industry with greater flexibility to employ treatments that:
  - are more operationally, logistically and resource efficient,
  - can contribute to lowering operational risks and constraints
  - can significantly reduce the health and safety risks associated with fumigation operations
  - Can contribute to a reduction in potential environmental impacts
  - Can be more cost effective

## **Should the additional single dose application of cylindered phosphine gas option be extended to include solid aluminium phosphide?**

18. As reflected above, the FOA and FFA supports the inclusion of both options, noting that MPI's assessment determined that technically there was "*no difference in the efficacy*" of the two options.
19. We note that the proposal indicates that the existing risk management controls for solid aluminium phosphide (ALP) would address the operational risks of using single dose Solid ALP tablets at a higher concentration.

## **Are the proposed changes for the measure of a successful phosphine applications to be a CT product of 100,000 ppm/h workable.**

20. While the workability of this proposed approach is best considered by those that undertake the work, the FOA and FFA support the shift to a CT product approach as this aligns with international phytosanitary standards (ISPM 43). We understand that it is workable.
21. This approach is a more meaningful measure than using dosi tubes to measure the current 200ppm requirement.
22. The FOA and FFA supports the proposed CT product value of 100,000 ppm/h as proposed as this is based on both modelling and the research provided to support the proposal and peer reviewed publications.
23. While we understand that this level might be exceeded, we would not support increasing this to meet what is operationally achievable, but that this threshold be set at a level that is supported by technical and scientific evidence as is required by international standard setting bodies.
24. We also agree that the use of this methodology will provide MPI with greater assurance that the phytosanitary risk have been effectively managed.

## What key implications should MPI be aware of when considering the implementation of proposed changes

25. Any such changes are likely to generate some operational implications, some will be foreseeable some will not.
26. However, we believe that the operational constraints or implications should be considered separately to the Logs OAP and the China forestry ICPR and that these set the standard that should be achieved (CT product) using the application options available.
27. We support the proposal presented by Phytos to establish an implementation review group comprising key participants/stakeholders (i.e. MPI, Phytos, treatment providers etc). This group can then consider any potential implementation constraints or opportunities at an operational level and elevate any that might warrant consideration in the Logs OAP or China Forestry ICPR.
28. All treatment options should be available and achievable for any prospective treatment provider if they are able to meet the standard and the operational requirements to do so.



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