

GE Free New Zealand In Food and Environment Inc.

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Re ERMA200706 and ERMA 200792 Arabidopsis thaliana

Dear ERMA Authority,

We would like to be heard in relation to this application.

There is little evidence that this research will benefit any body in New Zealand and the use of GE has not been specified as to what the research outcomes are to be.

Why are ERMA200706 and ERMA 200792 experiments being conducted?

Can alternative non-GE methods be used to achieve the same ends? (Section 44A)

Why has ERMA/EPA not asked the applicants for information around whether this “this research can be achieved through non-GE avenues? Until this application can detail what the purpose of the development is and if it can be achieved through non-GE methods, this application is non-compliant and should not be approved.

Why is viable material being imported?

This goes against the cost/ benefit model that ERMA has worked with over the years. This will change the established approach to The HSNO Act that ERMA has followed. The main purpose of both the CRI Act and HSNO when considering the experimental research is to gain scientific knowledge into how to create GE Organisms. Why then are the applications for importing viable seeds and how will this benefit New Zealand scientific expertise?

The application lacks information necessary for submitters to comment and to inform the regulatory process like -

What are the vector systems used?

What other Organisms are being engineered from these seeds?

What “new” plant varieties are being engineered?

Previous Breaches.

There are significant and justified concerns about the previous breach of containment of similar GMO's at the Lincoln Facility. MAF Biosecurity ERMA and the public were assured that these experimental facilities were under stringent expert management and escape was fear mongering by an activist sector of the NZ society.

Yet, Plant and Food, without advising ERMA, rented out their biosecurity facility over Christmas to a researcher on sabbatical leave, who brought his own *Arabidopsis thaliana* seeds without going through the ERMA approval process.

When the breach was discovered vital evidence was then destroyed and there was no prosecution or person /Organisation held accountable. The ensuing MAF Biosecurity report was a cover up of what happened. This 'indoor development', in a contained structure facility, incident followed closely the earlier serious GE Brassica field trial breach (GMF 06001).

These incidents show that there can few assumptions made as to the expertise of any person employed in the arena of GE research.

The two breaches were sign of illegal disregard for ERMA controls. This does not give the public confidence that ethical and moral scientific rigor is even respected. There also appears to have been no recognition by the CRIs, ERMA or MAF Biosecurity of the seriousness of the incidents for New Zealand agriculture and blatant disregard for GMO controls. No apology or acknowledgement of the wrongdoing has been put forward to the public of New Zealand. In fact, until MAF Biosecurity stepped in there was total denial that a breach of the field trial had occurred. It would be a serious error if any of the people involved held a position of importance in any further GE experiments.

Multiple Organisations.

These applications have been submitted by multiple CRIs. This is not feasible. As can be seen in all the previous breaches the lack of accountability that is the culture of all these applying CRIs does not provide confidence that they will follow the ERMA/EPA controls in future. It is a known psychological phenomenon that group think causes "collective optimism and collective avoidance," In other words no one takes responsibility for adhering to the controls as they assume it will be someone else's duty.

If this application is nevertheless approved once all the HSNO conditions are met, then there should be one independent management and governance Board. They should run the research with dedicated trained staff and an independent member of an NGO on the Board.

In depth expert training for the Board on past Biosecurity breaches and potential hazards are to be carried out as well as for the staff.

Only people who are directly involved with the experiment, no partners or outside persons, should be allowed to enter the premises.

Any visual information on the experiments, ERMA200706 and ERMA 200792, that a partner or person wants, must be filmed by a registered approved person directly involved in the experiment, then presented in a format that can be viewed outside the facility.

An Independent NGO assisted by MAF Biosecurity NZ is to regularly monitor the facilities on a random basis.

A dedicated holding pit should receive all facility wastewater; this would ensure that any escaped seed is contained. This water is to be held for a period of time then irradiated and passed through a mesh twice as small as the seed before it is released into the environment. Any sediment that is caught should be autoclaved then disposed of in a Biosecurity designated area.

Regular inspection and cleaning of the outside surrounding area is to be implemented. *A. thaliana* can sprout and set seed all within 6 weeks all the year round so monitoring should reflect this special nature of the plant and monitoring by an outside organisation or NGO auditor.

At no stage is any viable material to enter the environment. At the sign of any breach no matter how small the whole programme is **to be shut down**.

Sealed glasshouse with glass and concrete are to be built. No mesh or permeable material to be used in the structure.

A double entrance door, which is hermetically sealed to prevent escape of any fine seed or animal/plant material, must be in place. All foot wear and protective clothing is to be removed before exiting the outdoor area. The middle area is to be washed down after each exit and wastewater to go into the collecting tank. At the end of the day all floor surface are to be cleaned and all used material incinerated.

No facility is to be built where there is a danger of an earthquake, or severe weather conditions, like flooding where damage to the facility could occur.

The lack of any results of what the last GE experiments added to New Zealand scientific knowledge causes us to question whether this is in truth a benefit to New Zealand science or a collaborative overseas corporate enterprise that could damage New Zealand's hard earned scientific endeavours over the years.

In Summary,

Applications ERMA200706 and ERMA 200792 *Arabidopsis thaliana* are devoid of any detail that is required for proper assessment.

Human error is a constant possibility as has been seen by the cavalier arrogant attitude of previous 'expert' researchers.

No person, researcher or inspector, who was previously involved in the GMO operations that breached the controls should have any position in the management, running, governance or employment role of these applications.

ERMA200706 and ERMA 200792 Arabidopsis thaliana are non-compliant applications and until the required information is received it should not be approved.

Yours sincerely,

Jon Muller,
Secretary GE Free NZ in Food and Environment

cc Prime Minister,
Minister of Environment