

**SUBMISSION TO WHANGAREI DISTRICT COUNCIL RE: PROPOSED  
GMO Plan change #131**

Attn: Melissa Needham

Please find attached our submission. Please confirm you have received this and are able to open and read the document.

Yours sincerely,

**Jon Carapiet Spokesman- AGEFC 0210507681**

Submitter: Auckland GE-Free Coalition (AGEFC)

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**Contact: spokesman – Jon Carapiet**

We wish to be heard (Whangarei location).

We could not gain an advantage in trade competition through this submission.

AGEFC represents the Auckland community concern for precaution on GMO risks and protection of GM-free production. Auckland residents, ratepayers and mana whenua stand with our colleagues and whanau and mana whenua in Te Tai Tokerau.

**Introduction**

AGEFC is a network of concerned individuals, NGO's and community groups supporting protection of public health, GE-free natural environments and food production, and the precautionary principle.

We thank the council for its decade of collaborative work with other councils and multiple rounds of consultation with the community and stakeholders who have raised well founded concerns that the plan changes address.

## **Submission**

We strongly support the WDC and FNDC collaborative GMO Plan change but want any EPA approved outdoor GE experiments or field trials prohibited as well as all GMO releases prohibited.

**The provisions we are commenting on (relevant sections) are:**

1.1. Description and Expectations 1.2 Eligibility rules

1.3 Notification

2.1 Objectives

2.2 Policies

2.3 Information Requirements

2.4 General Development and Performance Standards 2.5

Particular matters

Definitions

1.1. Description and Expectations

1.2 Eligibility rules

1.3 Notification

We support the publicly notified collaborative Plan change of the Far North District Council and Whangarei District Council to ban the release into the environment of all genetically engineered organisms, but to also include prohibiting any approvals for outdoor experiments or field trials made by the Environmental Protection Authority (EPA).

Should an approval be made by the EPA and release be forced to proceed, AGEFC supports the plans making any outdoor experiments or field trials approved by the EPA a discretionary activity subject to stringent local additional conditions, particularly those not required under the Hazard Substances and New Organisms (HSNO) Act.

Within this AGEFC supports moderation of commercial risk-taking by applicants paying a substantial bond and being held accountable for any necessary remediation and other costs

AGEFC also supports establishing stringent on-going monitoring by independent scientists of any trial or release. This is required to be provided long after the EPA may cease to have responsibility or jurisdiction over an approved release of a transgenic organism.

AGEFC acknowledges the concerns of tangata whenua and supports the precautionary policies on genetic engineering technology of Tai Tokerau Iwi authorities for their respective rohe.

AGEFC supports the work of Northland and other northern Councils to protect the region's (and New Zealand's):

long-term and intergenerational wellbeing capacity to benefit from branding as non-GMO bio-integrity and biosecurity  
unique biodiversity

### **Rebuttal of opposition to the plan changes**

We are concerned that opponents to the plan change such as Federated Farmers are seeking to benefit by maintaining a transfer of risk to the wider community, whilst ignoring the widespread concerns in the community at home and overseas, where our exports are sold.

AGEFC also rejects the view that the plan changes should be amended to position the concern on GMOs as just

amongst tangata whenua, as if to say there is not equal concern in the broader community.

Such a view is not supported by the facts.

As part of its due diligence to understand the appetite for risk from GMOs amongst ratepayers and residents, The InterCouncil Working Party (ICWP) collaboratively commissioned an independent survey of residents in 2009. This research is owned by the councils of the ICWP and has informed the member councils' planning processes.

In 2013 a nationally representative survey of New Zealanders attitudes and behaviours confirms the public concern for protection and precaution on GMOs is not just amongst Maori.

The Colmar Brunton “Better Business” survey shows the concern is not limited to one particular ethnicity, but rather, that the level of concern is comparable for Maori and people from other ethnicities.

Percentage of those who support regional councils keeping their area free of genetically modified (GM)/genetically engineered (GE) crops or animals

1. 60% of the total population support
2. 58% of New Zealanders of European descent
3. 58% of New Zealanders of Maori descent
4. 65% of Asian peoples
5. 65% of Other European peoples
6. 67% of people from other ethnicities\*

No significant differences between total and various ethnicities opinions.

Base includes total sample of Better Business Better World report 2013 (n=1,008); New Zealanders of European descent (n=730); New Zealanders of Maori descent (n=38); Asian peoples (n=79); Other European peoples (n=86); other ethnicities (n=75).

\*This includes respondents who selected “Pacific Islander”, “New Zealander of Pacific Islands descent”, “New Zealander of other descent” and “Other”

(Source: Colmar Brunton, Better Business Report - 2013)

It is reasonable to consider this incidence of cross culture agreement as reflecting concern amongst residents of Whangarei and Northland who are not tangata whenua, as well as the ethnically diverse communities of Auckland, where Council is also a full member of the ICWP.

## **Disclosure of Commercial Advantage**

There is a declaration of 'no commercial advantage in making a submission' by some of those opposing the GMO protections in the plan change.

This is of significance because it highlights the transfer of long term risk inherent in commercialisation of GMOs outside containment. The industry and even Crown Research Institutes working with commercial partners are potential beneficiaries at a different level than the general public. Notwithstanding benefits to the wider community from science and technology, commercial drivers mean it cannot be assumed organisations are acting always for the greater good. See:

[http://www.isis.org.uk/Syngenta\\_Charged\\_for\\_Covering\\_Up\\_Livestock\\_Deaths\\_from\\_GM\\_Corn.php](http://www.isis.org.uk/Syngenta_Charged_for_Covering_Up_Livestock_Deaths_from_GM_Corn.php)

This tension justifies protections for communities afforded under the RMA and natural justice, and AGEFC opposes plans by the Minister for the Environment to remove such powers of protection.

If a transfer of risk is allowed, there is a private commercial benefit accrued, in particular from investment for Intellectual Property, through subsidising commercial risk-taking to accelerate commercialisation and avoid user responsibility.

Oversight of GMOs is not the end of science. GMOS are not the total sum of all biotechnology, and innovation for improved integrity and safe food production continues to succeed as evidenced by Zespri. This is not to

deny recognised community and public benefits of gene science, such as Marker Assisted Breeding, and ethical research in containment including insulin manufacture that the public appear to broadly accept. However, different matters arise when the benefits and costs of GMO uses outside in the environment are considered in plans.

**Summary: AGEFC supports the plan change**

The community concern has been the basis for the previous work undertaken by councils, and reflects established public concern across communities.

Preserving the highest level of food purity, safety and quality, and preventing chemical and genetic contamination and unethical production, are benefits to be valued today and into the future.

The long term management of soil and water, community wellbeing, and the marketing and export opportunity for quality products must be protected from emissions from GMO trials or an EPA-endorsed commercial release.

**Thank you for the opportunity to make this submission. We wish to be heard.**