

Highlights Package

Hearing 8B: GMO, 30th January 2020

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The Life Sciences Network **opposes** the request to include objectives, policies and rules relating to Genetically Modified Organisms (GMOs).

1. Context

- a. The Royal Commission on Genetic Modification in 2001 concluded New Zealand's regulatory system was robust and that we should proceed with caution on a case by case basis while preserving our opportunities.
 - i. Rejected bonds/special liability
 - ii. Considered GM free zones under the RMA
 - Difficult to implement
 - Could impinge on rights of those wanting to use GM
 - Too inflexible
- b. Genetic modification has a long history of use in NZ and worldwide.
- c. New Zealand, including the Waikato, is not GM Free now
 - i. Cheese enzymes
 - ii. Imported animal feed
 - iii. Medicines/Veterinary medicines
 - iv. Food
- d. Science and regulatory bodies conclude that the approved use of GM is safe.
 - i. Scientific consensus is strong
 - ii. There have been no adverse effects attributable to GM per se
 - iii. Claims to the contrary have not withstood scientific scrutiny
- e. Genetic modification is a popular technology for farmers.
 - i. >90% uptake in some jurisdictions
- f. More recent developments are providing unprecedented precision and opportunity to help address our challenges such as
 - i. climate change
 - ii. pest eradication
 - iii. water quality, and
 - iv. food production.

2. Government advice

- a. NZ's GM regulations are already too conservative.
- b. Opportunities are growing to use GM

3. Maori and iwi

- a. There is a range of views within Maoridom/iwi.
- b. Local environmental management plans do not specify local regulation specific to GMOs.
- c. There is already input opportunity for Maori.

4. Co-existence

- a. The asserted problems concerning loss of premium by allowing GM are overstated.
 - i. Tolerance for GM food exists in the market place
 - ii. "Prohibited use" (e.g. in organics) does not necessarily mean unintentional presence leads to decertification or product rejection.
 - iii. GM/organics thrive without co-existence regulation (e.g. USA)

5. Market

- a. Premium for both:
 - Non-GM foods
 - Organics
 - Non-GM Project
 - GM foods
 - Impossible Burger
 - Bt Eggplant
- b. No evidence that a GM free region
 - i. enhances the premium of products
 - ii. has overall economic benefit

6. Proponents

- a. Have set up a false equivalency
 - i. Cf. Fluoride, 1080, climate change, immunisation debates
- b. Rely on Northland Inter Council Working Party reports and information which is:
 - i. out of date
 - ii. unbalanced
 - iii. lacks scientific rigor
- c. Evidence
 - i. Includes issues which are not the subject of this hearing
 - ii. Selective
 - iii. Often relies on popular and social media (rather than scientific) sources
- d. Assertions made re risk appear to discount the existence of the EPA
- e. Have not demonstrated
 - i. any credible residual effects to be regulated by the council
 - ii. any effects from 20 years of field trials

7. Regulatory

- a. Waikato District Council considered and chose not to insert GMO provisions
 - i. Therefore limited opportunity to consider issues
- b. Environmental Protection Agency (EPA)
 - i. Considers evidence which is credible
 - ii. Takes a precautionary approach
 - iii. Can impose controls through conditional release
 - Including bonds and insurance
 - Local, national, crop specific
- c. Cascading controls
 - i. EPA/HSNO
 - ii. Regional Councils through pest management strategy
 - iii. Industry self-regulation
 - segregation and identity preservation practices already exist in NZ
 - iv. RMA when residual risks known
 - Case by case
 - Time and opportunity for plan change with immediate effect during EPA hearings
- d. The proposed rules
 - i. Are a blunt “one size fits all” instrument
 - ii. Create unnecessary and inappropriate duplication of the EPA process
 - iii. Stifle research and innovation which may be critical to NZ’s future
 - iv. Undermine future opportunities
 - v. Fail section 32 test of necessity, benefit and efficiency

Therefore we submit that there is no justification at this time to put in place blanket regulatory controls on genetic modification as proposed.

William Rolleston

30th January 2020