

GENETICALLY MODIFIED ORGANISMS CHAPTER - PROPOSED DISTRICT PLAN

FNDC Proposed District Plan Hearings - 23 October 2024

Hearing 7 statement by Vision Kerikeri

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We firmly support the Council's current precautionary approach which prohibits the release of any Genetically Modified Organism (GMO), as stated in the Overview of the PDP GMO chapter. We seek to retain the chapter on GMOs as notified, without amendments.

The approach reflects the longstanding stance of both the Far North District Council (FNDC) and other councils¹ in prioritizing their region's biosecurity, agricultural integrity, international market positioning and the precautionary approach. This stance is crucial not only to protect the environment but also to ensure that our local economy remains resilient and competitive on the global stage.

Justification for Precautionary Approach which prohibits GMO releases

Inter-Council Working Party on GMO Risk Evaluation & Management Options

Since 2003, FNDC has been a member of the Northland/Auckland Inter-Council Working Party on GMO Risk Evaluation and Management Options. Three major reports commissioned by the Northland/Auckland Working Party have outlined the risks associated with outdoor GMO trials and releases, emphasizing the need for stringent risk management. The FNDC's position on GMOs aligns with the recommendations from these reports, which call for a cautious approach to GMO use to prevent possible damage to the environment and economy.

The findings from the Northland/Auckland Inter-Council Working Party highlight significant deficiencies in the national regulatory framework for GMOs, specifically within the Hazardous Substances and New Organisms (HSNO) Act. These deficiencies include inadequate liability provisions and the absence of a mandatory requirement for the Environmental Protection Authority (EPA) to adopt a precautionary approach to outdoor GE/GMO applications.

FNDC's precautionary approach which prohibits the release of GMOs is a responsible and necessary action to create an additional layer of protection against the risks associated with outdoor GE/GMO experiments, field trials, conditional releases, and full releases. This position also aligns with the views of the majority of the district's ratepayers and residents, who have consistently voiced their preference for maintaining a GMO-free status in our region.

This perspective aligns with the stance of other councils that have opted for more restrictive GMO regulations to safeguard their regions' biosecurity and economic interests.

Deficiencies in national monitoring

Historical evidence has shown a number of failures by the central government regulator (ERMA/EPA) to adequately manage and monitor outdoor GMO field trials. For example, Plant

¹ Including, for example, Hastings District Council, Bay of Plenty Regional Council, Nelson City Council, Auckland Council, Wellington Regional Council

and Food Research's GE brassica trial was insufficiently monitored by both the Ministry for Primary Industries (MPI) and the EPA. Such lapses underscore the need for local councils to step in and safeguard their communities by imposing their own precautionary measures to mitigate these risks.

The inadequacies in the national framework justify the FNDC's proactive stance in protecting our local economy and biosecurity. The responsible action of maintaining precautionary and prohibitive measures serves not only to shield existing GMO-free producers but also to safeguard our indigenous biodiversity, food sovereignty, and cultural values. The value of our biosecurity cannot be overstated, as it underpins the economic sustainability of our farming sectors, including conventional, Integrated Pest Management (IPM) and organic producers.

Council's legal right to maintain precautionary policies on GMOs

The Environment Court, High Court, and Court of Appeal have upheld the right of local councils to regulate GMOs under the Resource Management Act (RMA). Decisions from these courts confirm that local authorities can establish policies that impose greater levels of control than those set by the EPA, emphasizing the responsibility of councils to protect the environmental and economic well-being of their communities. This legal standing supports FNDC's precautionary approach and strengthens the argument for retaining these provisions in the Proposed District Plan.

The legal precedents support the FNDC's position in the PDP and strengthens the case for keeping these GMO provisions intact. The panel should consider that local councils have both the right and responsibility to enact policies that reflect the unique values, environmental conditions, and market realities of their district.

Support for GMO-free position by iwi and hapu

Various iwi and hapu in this region, such as Ngati Rangi and Ngati Rehia, strongly support a GMO-free stance, citing concerns about the potential impact of genetic engineering on native species and ecosystems. Their submissions reflect a desire to exercise kaitiakitanga (guardianship) over their lands and water resources, reinforcing the cultural and environmental case against the use of GMOs in this district.

Concerns with GMO Use in Pest Control

An emerging issue in the GMO debate involves the proposed use of genetic engineering for pest control, which raises significant questions about its efficacy and potential unintended consequences. While GMO technology is often presented as a solution to pest issues, there are concerns about the long-term ecological impacts and the risks of introducing genetically modified species into the environment. This approach could lead to irreversible changes in ecosystems, potentially creating new problems rather than solving existing ones.

Growth in global non-GMO food market

In the evolving global market, there is a growing trend and increasing consumer demand for non-GMO products. Fortune Business Insights has reported that the global non-GMO food market size was USD 740.65 billion in 2023 and is projected to grow from USD 895.36 billion in 2024, and to USD 2,003.68 billion by 2032, growing at a CAGR of 11.94% during the 2024-2032

period.² As the PDP text is set to come into effect in about two years, we must ensure that it remains responsive to this growth in the international non-GMO food market.

GMO-free policies of major food corporations

Moreover, major corporations like Nestlé, Danone, and General Mills have adopted non-GMO policies to align with specific consumer preferences and market demands. These policies can influence agricultural practices worldwide, as they impact supply chains and set high standards for non-GMO ingredients.

For example, Nestlé, one of Fonterra's largest customers, has been expanding its use of non-GMO food ingredients in response to consumer demands for natural products. Any relaxation in GMO restrictions in our district could jeopardize our primary producers' access to key markets and undermine the economic stability of our agricultural sector.

- **Nestlé:** One of Fonterra's largest customers, Nestlé has been focusing on expanding its use of non-GMO ingredients to meet consumer demand for natural and organic products. The company's efforts are part of a broader strategy to maintain transparency and sustainability across its supply chain. The company states that Nestlé Oceania requires suppliers to demonstrate that only non-GM ingredients are supplied.³

- **Danone:** This global dairy and nutrition company has prioritized non-GMO ingredients in its supply chain, particularly in its U.S. brands like Dannon, Oikos, and Danimals. The company emphasizes sustainable agriculture and non-GMO practice.

- **General Mills:** The General Mills company has committed to using non-GMO ingredients for some of its popular brands.

- **Unilever:** Unilever is increasingly focusing on non-GMO options in its food products to meet consumer demand for natural ingredients. Although not entirely non-GMO, Unilever's approach is geared toward offering more transparency and sustainability in its product offerings, in line with global trends toward cleaner, more natural food sources.⁴

Conclusion

We strongly support the Council's precautionary approach which prohibits the release of GMOs. We seek to retain the PDP chapter on GMOs as notified, without amendments.

Given the well-documented deficiencies in national GMO regulation, the repeated failures of central monitoring bodies, and the significant market risks associated with GMO adoption, it is crucial that our district policies continue to take a precautionary approach to the protection of our environment, economy, and community values. The FNDC's precautionary stance not only aligns with the best practices identified by the Northland/Auckland Inter-Council Working Party but also secures the future of our GMO-free primary producers, ensuring that they continue to thrive in a global market that increasingly values natural and unmodified products.

² Fortune Business Insights market intelligence report, update Sept 2024
<https://www.fortunebusinessinsights.com/non-gmo-food-market-106359>

³ <https://www.nestle.co.nz/csv/responsiblesourcingcertification>

⁴ <https://www.unilever.com/sustainability/responsible-business/our-policies/>

Relevant PDP submissions include:

FS61, FS569 Vision Kerikeri

S433, FS572, FS80 GE Free Tai Tokerau / GE Free Northland

S462 Rolf Mueller-Glodde

S511 Royal Forest and Bird

S442 Kapiro Conservation Trust

S304, S515 Ngati Rangi ki Ngawha