

Online Further Submission

Further Submitter # 80

Further Submitters Name	GE Free Northland
Further Submitter Number	FS80
Wish to be heard	Yes
FS qualifier	a person representing a relevant aspect of the public interest (e.g. community group)
FS qualifier reason	Our community group is an original submittor to the FNDC proposed District Plan (on the GE/GMOs issue etc) and we are a key stakeholder in the Far North and wider Northland.
Joint presentation	Yes
Attention:	Mr. Martin Robinson
Contact organisation	GE Free Northland in food & environment
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Online further submitter?	Yes
Date raw FS lodged	09/09/2023 9:28pm

FS 80.1 - 80.8

Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	SupportOppose	FS Decision requested	Reasons
FS80.1	GE Free Tai Tokerau	S433.002	General	General / Plan Content / Miscellaneous	Amend the plan where possible to ameliorate climate change while continuing to oppose any outdoor use of GE/GMOs, including risky, controversial, and unproven GE/GMO gene edited grasses, trees, or animals.	Support	Allow	Our further submission is to reiterate our original position and provide clarification to council that we want FNDC to prioritize addressing/ ameliorating climate change while ensuring that the FNDC precautionary and prohibitive GE/GMO provisions, policies, and rules remain in the District Plan. GMOs include controversial and risky CRISPR/ gene edited organisms.
FS80.2	Rolf Mueller-Glodde	S462.001	Genetically modified organisms	Overview	Retain the chapter (Genetically Modified Organisms Chapter) as proposed.	Support	Allow	Our community group supports this

								Far North ratepayers excellent submission, which urges FNDC to retain the precautionary and prohibitive GE/GMO provisions, policies and rules in the operative District Plan...and place into the proposed District Plan. Retain the chapter (Genetically Modified Organisms Chapter) as proposed, with only minor changes to align with other relevant chapters in the interest of truly sustainable integrated management, protection of our biosecurity, indigenous biodiversity, our wider environment, existing GM free primary producers and their valuable enterprises, our economy, cultural values, growing organic sector/ Hua parakore and food sovereignty
FS80.3	GE Free Tai Tokerau	S433.003	Genetically modified organisms	Overview	Amend to note that controversial and risky gene edited organism (CRISPR technique) are GMOs.	Support	Allow	Our community group wishes FNDC to clearly note (in the context of the valuable precautionary and prohibitive GE/GMO provisions, policies and rules) that GMOs (Genetically Modified Organisms) include risky CRISPR/ gene edited organisms. This should not be difficult as the risky genetic technique CRISPR (gene edited organisms) are GMOs under NZ law. CRISPR is short for "clustered regularly interspaced short palindromic repeats" and has been shown to cause unintended/ unforeseen "off target" adverse effects in experiments overseas.
FS80.4	Northland Regional Council	S359.003	Cross boundary matters	Cross boundary matters	Amend the plan to align the more generic district plan rules with those of adjoining councils	Support	Allow	That FNDC needs to retain and

enhance the precautionary and prohibitive GE/GMO provisions, policies and rules (in the operative District Plan, as a result of collaborative GE/GMO plan change #18 (FNDC) and #131 (WDC). Yes- There are likely to be cross-boundary issues relating to jurisdictional boundaries with adjoining councils (eg. incompatible / inconsistent provisions or zoning) that need to be considered. GE/GMO contamination does not respect boundaries. There are too many vectors for GE/GMO contamination (seeds, pollen, vegetative material, wind, soils, waterways, animals, insects, extreme weather events, storage facilities, human error, etc). FNDC needs to continue its precautionary and prohibitive, collaborative and regional approach to the risks of GE/GMOs. We note that the Northland regional documents have precautionary and prohibitive GE/GMO provisions, policies and rules.

The Northland RPS deals with the overarching Policy and through the operative Regional Plan deals with those areas not covered by the District Plans ie. the Coastal Marine Areas (CMA)

We note that District Councils must give effect to the provisions of the Regional Policy Statements (must implement)

District Plans can not be contrary to the Regional Plans.

FS80.5	Rolf Mueller-Glodde	S462.001	Genetically modified organisms	Overview	Retain the chapter (Genetically Modified Organisms Chapter) as proposed.	Support	Allow	This submission is in alignment with our original submission. Totally support
FS80.6	Northland Federated Farmers	S421.200	Genetically modified	Overview	Retain the precautionary approach and the use of adaptive response	Support	Allow	This specific part of the Northland

	of New Zealand		organisms					Federated Farmers of NZ original submission is in alignment with our original submission (GE Free Northland). We support the precautionary approach to any outdoor GE/GMO applications, we support truly sustainable integrated management, we support the Precautionary Principle, we support councils excellent precautionary and prohibitive GE/GMO provisions, policies, and rules in the District Plan. We support FNDC's fiscally responsible, precautionary, collaborative, regional approach to the risks of any outdoor GE/GMO applications.
FS80.7	Northland Federated Farmers of New Zealand	S421.203	Genetically modified organisms	Rules	Delete the restrictions on the control and management of genetically modified organisms and replace with reference to the processes and controls imposed by the EPA	Oppose	Disallow	<p>Our community group (GE Free Northland) opposes this specific section (421.003 GE/GMOs issue) in the original submission by S421 Northland Federated Farmers of NZ.</p> <p>We oppose this part of the S421 submission (S421.003) because it is inconsistent with our original submission, and the relief we seek. Northland Federated Farmers and head office (Federated Farmers of NZ) falsely states that FNDC's fiscally responsible and collaborative GE/GMO provisions, policies and rules are "unnecessary duplication."</p> <p>The findings of the Northland/ Auckland INTER COUNCIL WORKING PARTY ON GMO RISK EVALUATION AND MANAGEMENT OPTIONS (of which FNDC is a full member since its inception in 2003), Local Government NZ, and many other councils (including Hastings District Council, Bay of Plenty Regional Council, Nelson City Council) clearly show significant deficiencies in the</p>

Hazardous Substances and New Organisms (HSNO) Act and multiple failures by the central government regulator (ERMA/ EPA).

Deficiencies in HSNO include inadequate liability provisions and no mandatory requirement by the EPA to take a precautionary approach to outdoor GE/GMO applications.

It has also been documented that in a number of cases MAF/MPI failed to adequately monitor ERMA/EPA rubber stamped outdoor GE/GMO field trials, including Plant and Food Research's GE brassica trial.

Local councils creating an additional tier of protection against the risks of outdoor GE/GMO experiments, field trials, conditional release (and banning full release) is highly necessary and in keeping with the wishes of the majority of their ratepayers and residents.

The responsible action of FNDC (and the other Northland/ Auckland councils) serves to help protect not only existing GM free primary producers and their valuable enterprises, but our biosecurity, indigenous biodiversity, wider environment, existing GM free primary producers (conventional, IPM and organic), food sovereignty, economy, and cultural values.

Three major reports commissioned by the Northland/Auckland Working party have identified a range of risks involved with the outdoor trialling and release of GMOs. They also include approaches to managing those risks.

Northland Federated Farmers and

head office (Federated Farmers of NZ) should be conversant with the above information and case law, given Federated Farmers repeated failures in the courts (attempting to stop local councils from placing precautionary and prohibitive GE/GMO provisions, policies and rules in local plans). Federated Farmers lost every single case in the Environment Court, High Court, Court of Appeal and Environment Court. Significant documentation provided in our further submission lodged with FNDC Via email, more details can be provided on request.

FS80.8	Ngati Rangi ki Ngawha Hapu	S304.001	Genetically modified organisms	GMO-P1	<p>Amend to ensure consistency with Ngati Rangi Policy regarding Genetic Engineering and Genetically Modified Organisms (3.4.1): The Ngāti Rangi rohe will remain free of G.E. and G.M.O. This includes but is not limited to:</p> <ul style="list-style-type: none"> a. animal and plant gene manipulation; b. any G.E. field trials, and c. any food containing anything from a G.E and G.M.O origin. 	Support	Allow	<p>Support because this part of of the Ngati Rangi ki Ngawha hapu submission (S511.05) is consistent with our original submission, and a precautionary and prohibitive policy regarding outdoor GE/GMO experiments is highly necessary. Support because GE Free Tai Tokerau supports the precautionary and prohibitive GE/GMO policies of all Tai Tokerau iwi/ hapu for their respective rohe. Support because of our concerns about any genetic engineering/ modification of native taonga species, including but not limited to manuka and kauri.</p>
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