

Supporting my submission to the proposed Plan Changes (WDC 131 and FNDC 18)

Submission PC18 -133, Hearing 16th June 2016 at Kaikohe.

GMOs are patently different than their host genome.

Touted as substantially equivalent, GMOs are nevertheless a totally new organism and elicit different traits to their host organism.

There is no certainty that other traits will not be affected and either activated/deactivated – favourable genes switched off, and unfavourable genes switched on

By their nature GMOs can replicate / reproduce and spread beyond the boundary of the area that they are initially sown / planted.

They can cross-breed with their “host –cousin” and contaminate neighbouring crops that are intended to be free of GMOs.

GMOs are therefore a threat to the local economy.

GMOs inevitably result in a lower quality and lower priced product, or are not able to be sold at all to the market that the non-GMO cousin was destined for.

Northland has a great reputation as a producer of high quality Primary products.

GE Free is the status quo, and this status should be protected by the District Plan.

Contamination by GMOs will result in lost markets, lost premiums, and lost status/certification – whether GM free or organic.

It is the high end market that we should be promoting and producing for, rather than allowing contamination by low value production.

Rules are needed to protect neighbouring growers/farmers from unintended effects of new technologies.

In time, proponents of GMOs or new technologies can apply for a Plan Change and argue on a case-by-case basis to introduce the new technologies, once it has been established that the new technology is not only beneficial but is also not detrimental to the Four Cornerstones

GMOs are a threat to the Environment

There is a lack of knowledge of the effects of GMOs in the wider environment.

By their nature, once released, GMOs will spread and have an effect on the wider environment.

GMOs may have unintended ill-effects on local/native flora and fauna, biota, and other soil micro-organisms.

Silver bullets, such as “GMOs to cure Kauri Die-back”, “GMOs for Opossum population control”, “GMOs as animal feeds”, or as an answer to current woes are seldom the right long-term solution, and inevitably lead to having to find yet another solution to the newly arisen problem! We should exhaust other options to achieve the intended goal of the GMO.

Cultural and Social aspirations should be driving the Regional and District Plans.

GE is an Issue of Significance to Northland Iwi and hapu. (Colmar Brunton Survey 2009)

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GE is also an issue of concern to the majority of non-Maori Northlanders (C B survey 2009)

Local Plans should reflect local aspirations.

The vast majority of submissions on the GE issue over the past 15 years has been for a GM free Northland.

There are no GM crops that have been through the HSNO process and are ready for release.

In the future if a developer / promoter of a GMO wants to release a GMO then he/she/they should have to apply for a Plan Change and argue the merits of such a Plan Change with a supporting s32 analysis.

It should not be up to the status quo GM free users to have to protect themselves from new technology.

If convinced that there will be no detrimental effects from the use of their technology then developers / promoters of the technology should be prepared to cover the costs of any unintended effects by placing a bond and being strictly liable for the consequences of a release, should such a release be permitted.

Until such time, the wishes and aspirations of the majority for a GM free environment should be respected and affirmed through the District Plan.

Once a GMO has been approved by the EPA for general release it will no longer be classed as a New Organism, and will therefore no longer be governed by HSNO. The RMA is complementary to HSNO and follows on to give order to the wider environment

After a GMO is approved for release any grower / producer will be permitted to use it anywhere throughout the country UNLESS there are rules in a District Plan prohibiting its use in the District.

The RMA is the proper vehicle to introduce Objectives, Policies and Rules into the WDC and FNDC District Plans to prohibit the use and release of GMOs at a local level and into the Northland environment.

Precedents already exist prohibiting the growing of certain plants / noxious weeds, so the idea of prohibiting the growing of GMOs is not new.

GMO contamination would be different to spray / smoke contamination in that GMO pollen will not be detectable but will cross-breed and downgrade their look-alike cousins.

The Ministry for the Environment has not shown that there will be protection of a conventional / GM free / Organic grower from the effects of a release of a GMO.

History has shown overseas, notably in Australia, a fellow Commonwealth nation, that there is little or no sympathy by Government for a grower whose crop has been contaminated by the neighbouring GM crop with subsequent loss of GM free status and loss of income. (Steve Marsh (W.A.) and Bob Mackley (Victoria))

The Government has repeatedly refused to set in place adequate rules to protect our present GM free farming industry from a potential release of a GMO. They have refused to introduce strict liability provisions and Financial Fitness provisions into the HSNO Act.

There have been too many examples of poorly managed GM trials leading to breaches of rules of containment, such as illegal flowering of brassicas, potential flowering of trees, and escape from containment of Cress seeds/seedlings.

MPI have shown themselves to be unable or unwilling to enforce containment rules, and it is only because there has been ongoing vigilance by the wider community that the breaches came to light.

Traces of GMOs may be comparable to traces of peanuts contaminating nut products and may induce allergies / shock.

I am not against medicines as they cannot reproduce and contaminate the environment like seeds and plants.

It is up to Local Councils to proceed with the proposed Plan Changes and prohibit the release of GMOs into the Far North and Whangarei Districts.