

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 18 of the Far North District
Plan

AND

IN THE MATTER of Proposed Plan Change 131 of the Whangarei District
Plan

**JOINT HEARING OF SUBMISSIONS BY COMMISSIONERS OF THE FAR
NORTH AND WHANGAREI DISTRICT COUNCILS**

**EVIDENCE OF MARION THOMSON
ON BEHALF OF
SOIL & HEALTH ASSOCIATION OF NEW ZEALAND INCORPORATED AND
14 OTHER SUBMITTERS**

DATED: 3 June 2016

INTRODUCTION

1. My name is Heather Marion Thomson. I am the Co-chair of the Soil & Health Association of New Zealand Inc (SHANZ)
2. I have been a member of the National Council of SHANZ since 2003 and in the position of Co-Chair since 2010.
3. I was one of the founding members of Organic Farm NZ (OFNZ), the local market organic certification scheme.
4. I was also one of the founding members of Organics Aotearoa NZ (OANZ) the umbrella group for the organic sector in Aotearoa New Zealand.
5. I have been a very active member of the organic and biodynamic community for over 40 years.
6. I have been an organic grower all my life, either as a home gardener, community gardener, or as a commercial grower.
7. I am fully aware of, and I understand, the compliance requirements to establish and maintain the integrity of a certified organic property or certified organic operation.
8. I work with commitment and dedication to the priorities of Soil & Health, which includes growing the membership, producing Organic NZ magazine, and providing essential advocacy on behalf of Soil & Health's members and the general public on issues of food safety, food security and food sovereignty.
9. I am authorised to make these submissions on behalf of the Association and its 3,000 + membership, which includes organic growers some of whom are certified through Bio Gro, Assurequality, Demeter and Organic Farm NZ.

SCOPE OF EVIDENCE

10. My evidence addresses the following matters:
 - (a) An outline of who SHANZ is as an organisation;
 - (b) SHANZ's concern that a precautionary approach should be promoted when dealing with outdoor genetically modified organism ("**GMO**") activities.

SOIL & HEALTH ASSOCIATION of NZ

11. SHANZ is the largest membership organisation supporting organic food and farming in New Zealand. It has about 3000 members, and is one of the oldest organic organisations in the world.
12. SHANZ promotes organic farming and works on many issues surrounding health, safe food, pesticides, genetic engineering, sustainable development and organic food production. The membership includes home gardeners and consumers, commercial growers and farmers, processors, retailers, restauranteurs, and health practitioners.
13. Soil & Health Association of NZ was founded in 1941 as The Humic Compost Club by Dr Guy Chapman. The founding committee was concerned at the poor state of national nutrition due to the low priority given to sustainable, organic farming and growing practices, even in those times. Educating people about and promoting the use of compost to home gardeners and commercial farmers has been one of the core activities undertaken by this organisation ever since.
14. In 1942 the first issue of the Compost Club Magazine was printed, which over the years evolved into New Zealand's leading organic magazine, *Organic NZ*. This authoritative magazine is read by members and sold in retail outlets throughout New Zealand. It educates people about producing and eating healthy and safe food in New Zealand. It is supported by a website and a Facebook page.
15. Publishing *Organic NZ* is a primary function, but the Association does engage in a range of work including:
 - Supporting the development of research into organics;
 - Promoting organic production methods;
 - Working to curb pesticide and chemical use and inform and educate people about the effects of these on human health and the environment;
 - Supporting local and national initiatives to halt chemical trespass;
 - Providing information to key stakeholders including growers and consumers on how to grow, buy and eat fresh, safe organic food, and issues about contamination in the food chain – e.g. Working on behalf of its members to lobby local and central government to influence future policy – e.g. Submission

in opposition to clause 105 of the Resource Legislation Amendment Bill 2015, Food Irradiation, Animal Welfare, Natural Health and Supplementary Products Bill.

- Operating the Project Gro fund to help schools, marae and community gardens to establish or redevelop organic gardens and/or provide them with mentoring support.
- Educating people about organic growing and natural health via local Soil & Health Association branch activities such as field days, seminars and working bees.

THE NEED TO PROMOTE A PRECAUTIONARY APPROACH

16. GMO activities have been of particular concern to SHANZ, and its members, since the technology was developed in the 1980s. *Organic NZ* has published numerous articles about GMOs since the early 1990s to explain transgenic technology and investigate its safety.
17. The magazine continues to keep members and readers up to date with an increasing body of research showing adverse human and animal health reactions to eating genetically engineered food, and other negative consequences of the use of genetically engineered crops, such as increased herbicide use and the use of more toxic herbicides. Among the regular articles published in *Organic NZ* on GMOs are those contributed by the group of Physicians and Scientists for Global Responsibility, which have been written and/or peer reviewed by scientists with expertise in the field.
18. SHANZ's membership has consistently called for action to prevent or restrain using this technology freely in the environment, unless or until it can be proven to be safe, healthy and beneficial for people and the environment, and to ensure users of the technology take financial responsibility for any negative consequences.
19. SHANZ strongly supports a precautionary approach to the outdoor use of GMOs.¹ SHANZ also pointed out some gaps in reliance on regulation under the HSNO Act alone and the desirability of an integrated approach under the RMA².
20. SHANZ has monitored most of New Zealand's Genetic Engineering field trials, over the last few years, and reported on what it believed to be significant compliance

¹ Our PC131 submission Paragraph 4.11

² Our PC131 submission Paragraphs 4.4 to 4.8

breaches. These include breaches by Scion at its Rotorua facility where GE pine trees were being grown in an outdoor field trial.³ No matter how good the conditions of consent for GMO use, there will always be a risk of contamination from the unforeseen, natural events in nature and human error.

21. In my experience, the EPA does not encourage local community input into “national interest” decisions and of course it is not in the best interest of the applicant to actively publicise and attract attention to proposals associated with GMOs.
 22. Councils that wish to submit and participate on behalf of their communities in GMO approvals and placements under HSNO can do so more effectively when they can demonstrate provision for GMO activities under their own planning documents.
 23. From its work, SHANZ is acutely aware of the importance of the precautionary regulation of GMOs to local and national communities. Although there is considerable lack of awareness of the risks and implications of outdoor use of GMOs in the general community, there is an acute awareness in the organic production community and its markets. For this important and rapidly growing community, the impacts of any GMO contamination of organic production could have devastating and irreversible impact.
 24. Organic production and preferring to use organic products in the home and in some businesses is an integral part of the culture of an increasing large number of people within the community. Loss or significant damage to organic production or the availability of organic products would have significant adverse cultural effects.
 25. In the latest OANZ (Organics Aotearoa NZ) Organic Market Report 2016, the organic sector is said to be one of the fastest growing sectors globally. The report finds that the organic sector in New Zealand has grown in value by around 28% in the last 3 years..In the retail sector the growth of organic produce sales has been some 128% over three years. Economically as well as from a community point of view, the certified organic production industry is of considerable importance. It would be poor planning to take anything less than a precautionary approach to GMO status in Northland and thus put this whole industry at risk.
 26. A further issue is financial responsibility for the impact of contamination which would be potentially devastating for certified organic producers. SHANZ strongly supports provisions in the Far North and Whangarei District Plans to require GMO use consent
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holders to be financially responsible for any damage to the environment, adverse effect on impacted producers and the cost of monitoring. Any GMO contamination, regardless of the circumstances should be the financial responsibility of the consent holder and not impact financially on those adversely affected by it.

CONCLUSION

27. I am fully aware that there is a lack of understanding, by the general public, of the science and the implications regarding GMOs. Soil & Health aims to inform and educate their members and the general public about the science and the implications of GMO's in the environment.
28. There are well recognised risks associated with the outdoor use of GMOs and potential damage from contamination includes devastation of individual certified producers or whole regions of producers. Maintaining GE free status for the already significant and rapidly growing organic production industry must have a high priority.
29. Including strong and unequivocal GMO policy and rules provisions also provides acknowledgement of community views and concerns – not just producers. Potential impact of outdoor GMO use involves significant cultural, social and health issues for the community and it is appropriate for these important views to be reflected in the provisions of the Far North and Whangarei District Plans.
30. SHANZ therefore strongly supports the precautionary approach to outdoor use of GMOs proposed by PCs 18 (FNDC) and 131 (WDC), objectives and policies, prohibited use status for general outdoor use of GMOs and the intent to make consent holders for trials financially responsible for any consequent contamination.

Dated 3 June 2016

A handwritten signature in black ink, appearing to read 'Heather Marion Thomson', is written over a light grey rectangular background.

Heather Marion Thomson