

Liz Searle

From: organics@value.net.nz
Sent: Monday, 7 November 2022 1:16 pm
To: Proposed District Plan
Cc: Greg Wilson; 'Linda Grammer'
Subject: additional info to supplement our community groups submission - refer to email dated 21 October 2022'.

Categories: Form 5 followup, Liz

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Kia ora Liz

Thanks for your call this morning

I can confirm that GE Free Taitokerau/Northland has NO trade or business interest in the Far North District proposed plan.

We are a not for profit community organisation dedicated to good health outcomes.

I hope this is sufficient explanation, but please contact me if you would like me to present this in a different format

Nga mihi,

Marty Robinson

For GE Free Taitokerau

From: Proposed District Plan <pdp@fndc.govt.nz>

Sent: Monday, 7 November 2022 10:15 AM

To: organics@value.net.nz

Cc: Greg Wilson <Greg.Wilson@fndc.govt.nz>; Linda Grammer <linda.grammer@gmail.com>

Subject: RE: thanks, DEADLINE for additional info to supplement our community groups submission??, Marty please action FW: please respond Liz/Marty Re: thanks, please send attachment/ information request to Marty Robinson (GE FRee TAI Tokerau secretary)Re: please

Hi Marty,

I can appreciate that you're probably busy. A response by the end of the week would be fine as you won't be adding any new submission points beyond those that were already raised in your earlier submission, which was received by the closing date. If you wish to any raise new matters then you would need to make a separate, late submission

We look forward to hearing for you.

Kind regards



Liz Searle
Policy Planner

Strategic Planning & Policy, Far North District Council | 24-hour Contact Centre 0800 920 029

DDI +6494070357 | M +64272457555 | Liz.Searle@fndc.govt.nz

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From: Linda Grammer <linda.grammer@gmail.com>

Sent: Monday, 7 November 2022 9:52 am

To: Proposed District Plan <pdp@fndc.govt.nz>

Cc: organics@value.net.nz; Greg Wilson <Greg.Wilson@fndc.govt.nz>

Subject: thanks, DEADLINE for additional info to supplement our community groups submission??, Marty please action FW: please respond Liz/Marty Re: thanks, please send attachment/ information request to Marty Robinson (GE FRee TAI Tokerau secretary)Re: please a...

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att: ;Liz Searle

FNDC

Morena Liz (and Marty)

thanks for this information Liz

can you please advise THE DEADLINE for Marty providing this information?

thanks

Marty please action as soon as you can (appreciated)

Nga mihi

Zelka Linda Grammer

chair, GE Free Tai Tokerau

On Sun, Nov 6, 2022 at 12:39 PM Proposed District Plan <pdp@fndc.govt.nz> wrote:

Hi Marty,

Thank you for your time this morning to briefly discuss the submission lodged by GE Free Tai Tokerau to the proposed Far North District Plan. You'll find the submission at the end of this email.

As I indicated, we've undertaken an initial review of the submission and note that there's some information gaps where council requires further detail, in particular a statement relating to trade competition. I've attached a copy of Council's submission form that includes the detail that submitters need to provide to meet the requirements of the Resource Management Act. For example, there are some specific restrictions that apply to people or organisations with a trade or business interest in a proposed plan. You can't make a submission about a proposed plan on trade competition grounds and therefore the attached form includes a question relating to trade competition. Your current submission does not comment on trade competition and whilst I suspect that it's unlikely to be an issue, we do require your specific comment in this regard please.

If you could either fill in the form and email back to me please, or provide a response to this email commenting on trade competition, whichever is easiest for you. If you use the form, where matters are addressed in your submission below, you can simply state 'refer to email dated 21 October 2022'. I'll attach your response to your submission below and retain a written record of this correspondence.

For more information and next steps throughout the process please visit: <https://pdp.fndc.govt.nz>. If you require any further information, please feel free to contact the District Planning Team on email pdp@fndc.govt.nz or 0800 920 029. I'm happy to meet you in the Kerikeri service centre if you require any assistance.

Kind regards



Liz Searle
Policy Planner

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From: Linda Grammer <linda.grammer@gmail.com>
Sent: Friday, 21 October 2022 4:50 pm
To: dpd@fndc.govt.nz
Cc: Greg Wilson <Greg.Wilson@fndc.govt.nz>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>
Subject: submission by GE Free Tai Tokerau (to FNDC proposed District Plan)

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Submission to:

Far North District Council

Private Bag 752, Kaikohe 0440

Te Tai Tokerau

In response to:

FNDC proposed District Plan

Submission by:

GE Free Tai Tokerau

Contact details:

secretary, GE Free Tai Tokerau

PO Box 1439

Whangarei 0140

Te Tai Tokerau

email: organics@value.net.nz

cc: linda.grammer@gmail.com

Tēnā koutou katoa

Thank you for the opportunity to make a submission so that together we can achieve sound biosecurity, biodiversity, environmental, economic, cultural, food sovereignty, public health, and other important outcomes.

We wish to be heard.

Who we are:

Our community group works constructively with all Northland territorial authorities, the Northland Regional Council, Tai Tokerau and Tāmaki Makaurau mana whenua, Northland Conservation Board, Northland/ Auckland primary producers, and various other organisations as well as Landcare groups to protect our existing valuable GE/GMO free status...to protect our biosecurity, unique biodiversity, wider environment, conventional, IPM and organic primary producers, our economy, food sovereignty, cultural values, growing organic sector (including certified Maori organic produce/ Hua Parakore), and the public health from the risks/ adverse impacts of outdoor use of GMOs.

We support NZ's existing Zero Tolerance Policy for any GE content in imported seeds, including adventitious presence. We support the precautionary and prohibitive GE/GMO policies of all Taitokerau Iwi authorities for their respective rohe, Bombay Hills north to Reinga.

We support the innovative work of all the member councils of the Northland/ Auckland "Inter Council Working Party on GMO Risk Evaluation & Management Options", working to create an additional (much needed) tier of local protection against the risks of outdoor use of GMOs. This is necessary given serious deficiencies in the Hazardous Substances and New Organisms (HSNO) Act, as identified by Local Government NZ, the ICWP on GMOs, and many other councils.

GE Free Tai Tokerau works constructively with local authorities, primary producer boards, local mana whenua and other key stakeholders/ environmental organisations to keep unwanted new organisms (GMO and otherwise) out of Tai Tokerau and Tāmaki Makaurau region.

We applaud the efforts of various NZ councils (including Hastings District Council, Bay of Plenty Regional Council, Wellington Regional Council, and Nelson City Council as well as the Tai Tokerau and Auckland councils) to put in place a much-needed additional tier of local protection against the risks of outdoor use of GMOs to their regions biosecurity, unique biodiversity, wider environment, GE free primary producers, economy, cultural values, and food sovereignty.

This action by local authorities is necessary given serious deficiencies in the Hazardous Substances and New Organisms (HSNO) Act. Deficiencies in HSNO (as identified by Local Government NZ, many councils, and the Northland/Auckland ICWP on GMOs) inadequate liability provisions and no mandatory requirement for the EPA to take a precautionary approach to outdoor GE/GMO applications.

Our community group, a key stakeholder, is extremely concerned about the risks of any outdoor GE/GMO experiments, field trials or releases (this includes controversial "gene edited organisms, which are GMOs). These risks have been identified by the Northland/ Auckland "Inter Council Working Party on GMO Risk Evaluation & Management Options" (of which FNDC has been a full member since its inception in 2003).

We ask council to ensure that the FNDC proposed District Plan contains the precautionary and prohibitive GE/GMOs wording/ policy. Such wording reflects the operative FNDC District Plan (GE/GMOs wording as a result of FNDC successful GE/GMO plan change #18) and strong community concerns (expressed to FNDC over many years by ratepayers/residents including local mana whenua), sets policy direction, and budgetary requirements.

This is also in keeping with the precautionary and prohibitive GE/GMO provisions/ policies and other wording in the operative Northland "Regional Policy Statement" (precautionary GE/GMO Policy 6.1.2 and Method 6.1.5) and operative Regional Plan.

It was good to see (last year) precautionary and prohibitive GE/GMO wording in the FNDC draft District Plan, with council staff noting the inadequate liability provisions under the HSNO Act.

We understand from FNDC staff that overall FNDC has retained the current operative framework (in the FNDC operative District Plan), but made changes in the proposed District Plan (Far North) as required to meet the new format and an activities based plan for example.

We support the councils precautionary and prohibitive GE/GMO provisions/ policies/ rules in the operative FNDC District Plan (as a result of successful GE/GMO plan change #18, undertaken in a fiscally responsible collaborative process with Whangarei District Council- WDC PC#131) being placed in the new Far North District Plan. S433.001

This excellent FNDC GE/GMO policy reflects Far North Districts farmer/primary producer and other ratepayer/residents wishes and aspirations, sets council policy direction, helps protect our existing valuable GE/GMO free status, as well as financial/ budgetary requirements.

We thank council for its hard work to date (both as an individual council and as a full member of the Northland/ Auckland INTER COUNCIL WORKING PARTY ON GMO RISK EVALUATION AND MANAGEMENT OPTIONS*) addressing the risks of any outdoor GE/GMOs experiments/ field trials/ releases to our biosecurity, unique biodiversity, wider environment, existing GM/GMO free primary producers, growing organic sector, food sovereignty, economy, cultural values, and the public health.

Please ensure funds are budgeted in the new District Plan so that FNDC can continue to participate in the good work of the Northland/ Auckland ICWP on GMOs (particularly in the event of an application for an outdoor GE/GMO experiment/ field trial in Northland to the EPA). A \$10,000 contingency fund is necessary.

We ask that FNDC continue to participate fully (as a full member of the ICWP on GMOs) in any work done by the Northland/ Auckland "Inter Council Working Party on GMO Risk Evaluation & Management Options".

It would be useful if FNDC would identify an appropriate FNDC staff member and FNDC elected representative to sit on the ICWP on GMOs as necessary (previously this role has been held by staff member Tammy Wooster and various councillors).

Protection for our growing organic sector

Hua Parakore (Maori organic primary producers) valuable businesses need protection from any outdoor use of GE/GMOs, including those certified under the National Maori Organic Authority- Te Waka Kai Ora. The various organic standards (including under Organics Aotearoa NZ and Te Waka Kai Ora) do not permit the use of any GE/GMOs (this includes gene edited organisms).

see

<https://www.tewakakaiaora.co.nz/>

Climate change

We urge FNDC to do everything in its power to help ameliorate \$433.002 climate change.

Our community group shares the concerns of many Far North ratepayers/ residents about climate change (as well as any outdoor use of GE/GMOs) and would like to see FNDC join other councils (as well as the relevant agencies in NZ government) in prioritizing swift and appropriate action to combat 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).

Plans by irresponsible parties (including overseas multinational companies) to develop GE/GMO grasses, trees or animals (without being

held liable for unintended/unforeseen adverse impacts of EPA approved activities) are ill-advised and of particular concern . Such new organisms would be impossible to prevent from contaminating our existing GMO free agriculture, horticulture, apiculture, forestry, as well as the wider environment/ finite resources like soils and waterways. Vectors for GE/GMO contamination including soils, water, wind, pollen, seeds, vegetative material, insects, animals, machinery, human error, extreme weather events including floods, etc.

To date proponents of these hazardous new technologies

- refuse to be personally and financially liable for unintended or unforeseen adverse impacts of an EPA approved outdoor GE/GMO experiment/field trial or release.

- are indifferent to the fact that under the Hazardous Substances and New Organisms (HSNO) Act there are inadequate liability provisions and no mandatory requirement for the EPA to take a precautionary approach to outdoor GE/GMO applications. Ie. they do not support/ actively oppose the concept of "the polluter shall pay" and the Precautionary Principle.

NZ is a signatory to the Cartagena Biosafety Protocol (the **Precautionary Principle**, as formulated in the **Cartagena Protocol on Biosafety** to the Convention on Biological Diversity, was based on the presumption that living modified organisms (LMOs or GMOs) were likely to have adverse effects on the environment and human health).

We thank council for it's hard work addressing the risks of GE/GMOs to date (initially under the leadership of former Mayor Yvonne Sharp and subsequently Mayor John Carter).

Gene Edited Organisms

We urge FNDC to note in the new District Plan that controversial and risky gene edited organism (CRISPR technique) are GMOs (and mention them specifically).

S433.003

We stress that gene edited organisms (CRISPR controversial technique) are genetically modified organisms under NZ law and as ruled by the highest court in the EU. Gene edited organisms have been shown (various independent reports and peer reviewed scientific papers (see Appendix below at **)) to have unexpected/unforeseen, off target adverse effects (undesirable traits manifesting in the organism) and should not be allowed in Far North District or the wider region.

We've studied quite a few reports/fact sheets on gene editing. You can find some of these here: <http://emergingtech.foe.org.au/synthetic-biology/>

You may also want to look at this recent Canadian Biotechnology Action Network (CBAN) report. As more and more reputable information about the risks of gene editing is emerging some former supporters of "gene editing" are now distancing themselves from this technique.

<https://cban.ca/genome-editing-in-food-and-farming-risks-and-unexpected-consequences/>

"Gene editing myths and reality - a guide through the smokescreen"

<https://www.gmwatch.org/en/19751-gene-editing-myths-and-reality-a-guide-through-the-smokescreen>

We oppose any outdoor use of risky and controversial gene edited organisms (CRISPR) or "gene drive" (a sterility technique that presents grave risks to NZ's biosecurity, indigenous biodiversity, and wider environment). While we strongly support robust protection of native flora and fauna, use of such risky new genetic technologies on our public conservation lands (or elsewhere) would be counter productive and potentially create far more serious problems than it solves.

S433.004

Forest and Bird's updated precautionary GE/GMOs policy specifically states the societies opposition to any genetic modification (including gene editing) of indigenous flora and fauna.

See

<https://www.forestandbird.org.nz/resources/genetic-modification-policy>

<https://www.forestandbird.org.nz/sites/default/files/2020-08/Genetic%20Modification%20Policy.pdf>

The immediate past Minister of Conservation Hon Eugenie Sage clearly stated her opposition to any outdoor use of GE/GMOs, including gene edited organisms/ CRISPR or "gene drive", which was conveyed in no uncertain terms to both the Department of Conservation and Predator Free 2050 Ltd.

"Gene editing is an unproven technology for predator control. Gene technologies are problematic and untested and have significant risks.

"They have no social licence to operate. There is a lot at stake and there is a need for the utmost caution.

"There would be serious questions around the risks to New Zealand's GE-Free reputation from being associated with any field trials of gene technology."

-Minister of Conservation Hon Eugenie Sage

In our view, we need to focus on organic/ regenerative agriculture/horticulture and forestry, and humane, ground based feral control. We believe the greatest impacts for global warming in New Zealand are in land management, and therefore the most pressing area for immediate constructive action to address harmful climate change.

Adoption of existing sound and sustainable farming methods like organic farming (and Forest Stewardship Council -FSC- and Programme for the Certification of Forestry-PEFC certified forestry) has many advantages including protecting our food sovereignty, access to key markets and premiums, and protecting the right of Far North residents to eat GE/GMO free food (as well as assisting in the reduction of greenhouse gas emissions).

If such sound and sustainable methods (in primary production) are more widely adopted it would protect our ability to nourish ourselves (food supply/sovereignty, protect the public health, achieve truly sustainable forestry, and create safe habitat for endangered species, as well as increase the ability to reach the 2050 emissions targets proposed by the Climate Change Commission in NZ.

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