

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Natural Resources Plan of the Greater Wellington Regional Council

**JOINT HEARING OF SUBMISSIONS BY COMMISSIONERS OF THE
GREATER WELLINGTON REGIONAL COUNCIL**

**EVIDENCE OF CLAIRE ANNETTE BLEAKLEY ON BEHALF OF
GE FREE NEW ZEALAND**

Dated 6 June 2017

INTRODUCTION

1. My name is Claire Bleakley. I am the President of GE Free NZ.
2. GE Free NZ in Food and Environment is an Incorporated Society. It is a non-Governmental Organisation with a Board and large membership, across all cultures. It represents its members when making submissions and helps with gathering and disseminating information concerning genetically modified organisms (“**GMO**”) to its members and the public through regular newsletters and its website (www.gefree.org.nz).
3. Our members in the Greater Wellington Region have asked GE Free NZ to be involved in this process on their behalf. They are very concerned about the lack of objectives, policies and rules governing the use of GMO’s in the proposed Natural Resources Plan of the Greater Wellington Regional Council, as our members consider it dismisses community concerns about how the Regional Council should approach the significant sites, natural and farmed, that would be affected by GMO activities within the region.

SCOPE OF EVIDENCE

4. My evidence will address the following matters:
 - (a) The difficulties community groups face having their concerns address through the Environmental Protection Authority (“**EPA**”) decision making framework’
 - (b) That GMO breaches have already occurred in New Zealand that endanger the environment and economy.
 - (c) It is the Regional Council’s role to safeguard the interests of local communities when faced with uncertainty about environmental effects.

COMMUNITIES PARTICIPATION IN DECISION-MAKING.

5. GE Free NZ has participated in consultation process with both local and central government.
6. The amendments made to the Resource Management Act have recognized that

individual councils can place precautionary rules, objectives and policies around genetically modified organisms (**GMO's**) where there is no duplication of other legislation.

7. I have found the EPA to be generally unresponsive to concerns raised by community and Maori groups during GMO applications under the Hazardous Substances and New Organisms Act 1996 ("**HSNO**").
8. In my experience the EPA only seems to be concerned with the site-specific experimentation of any proposal, and not issues such as how GMO activities might be safely rolled out within the wider environment.
9. It is similarly my experience that local authorities are the most appropriate bodies to address local concerns in decision-making.

GMO INCIDENTS IN NEW ZEALAND

10. I acknowledge all the valuable scientific work that is done throughout New Zealand. It is important to acknowledge, however, that much of this work has been achieved through non-genetic engineering ("**GE**") methods.
11. There have been five field trials of GMO's in New Zealand. Two of the trials are close to commercialization. (Scion Trees, AgResearch grass).
12. I have been notified through the Ministry of Agriculture and Forestry ("**MAF**"), now Ministry of Primary Industries, and Environmental Risk Management Authority ("**ERMA**"), now Environmental Protection Authority ("**EPA**"), that there have been many biosecurity breaches of laboratory and field trial controls in GM trials throughout New Zealand. These have mainly occurred through human error in all trial sites. A map of trial sites in New Zealand in which errors have occurred is **attached** to my evidence as "**A**".
13. I would like to highlight three breaches, two that were at the Scion site and one in Lincoln involving a flowering brassica in December 2008.
14. I was involved at the ERMA hearing where Scion was given approval to conduct two field trials on herbicide resistant and reproductive altering *Pinus radiata* and *Picea abies* (GMF99001 & 99005). These field trails were to be carried out at the Scion facility in Rotorua.

15. The trial started in 2003 and the first breach occurred in January 2007, the second occurred on April 2012. In both incidences the perimeter fence was breached and GM trees were cut down. MAF Biosecurity, who was called in to look into any threat that the breach might have posed, considered both of these incidents a biosecurity risk. The Incident report is **attached** to my evidence as “**B**”.
16. A further biosecurity breach occurred in December 2008 at a secret Crop and Food site in Lincoln where a GM brassica field test was being undertaken. A GM brassica plant was found flowering and had produced a seedpod in the site.
17. MAF Biosecurity issued a Critical Situation Report where they found that there was a further incidence of a biosecurity risk that occurred earlier in the trial and the site was closed down. I understand that this was due to the environmental risks that these incidents posed and serious errors of judgment that the report identified. The ERMA New Zealand Inquiry Report INQ08001 is **attached** to my evidence as “**C**”.
18. Seed specialist nurseries and farms surrounding the GM Brassica site could have been adversely affected if the untested GM pollen had escaped into their fields.
19. I have been told that the Greater Wellington Region is a food bowl, and growers within the region rely on its ability to produce GMO Free produce for national and international markets. I am aware of overseas incidents that show unforeseen weather events, pollen drift and accidental GM seed spillage have contaminated non-GMO farms which has caused a high eradication cost and economic loss. A copy of an article discussing the consequences of such contamination is **attached** to my evidenced as “**D**”.
20. The latest predator control GM technologies using gene drives pose a significant threat to farming activities through transfer of genetic material across species boundaries, leading to extinctions, biodiversity loss affecting ecosystems, if released anywhere in the environment (**Attachment E**)
21. I am concerned that if a GMO contamination incident occurred in the Greater Wellington region it would seriously affect non-GMO producers (not just organic producers) and threaten our natural produce export markets.

THE ROLE OF THE REGIONAL COUNCIL

22. Feedback from our Greater Wellington Region members has made me aware that many of them make their livelihood from arable farming, horticulture and forestry.

They are very concerned about the risks posed to their businesses given past evidence of human error in GMO activities.

23. The Rimutaka and Tararua and all Forest Parks, are also a significant recreational and tourist attraction for the whole region. Wairarapa Moana is the most significant wetland in the south of the North Island and is a sacred water body for Maori. The "Macaskill Lakes" (Te Marua) are vital for providing potable water for the whole Wellington region. These sites would be jeopardized by the release of GMO's to the environment.
24. Members are particularly concerned that Regional Council's address risks posed by GMOs on a regional level and develop mechanisms for mitigating those risks within their planning documents.
25. I consider that the Natural Resources Plan of the Greater Wellington Regional Council is the most appropriate place to make precautionary guidelines on GMO's.
26. I understand that in time it is possible that there will be full-scale release of GMOs on a commercial level within the Greater Wellington Region. Local authorities must be able to plan for those activities.
27. The decision GE Free NZ seeks from the Greater Wellington Regional Council is that the Proposed Natural Resources Plan be amended to include the following:
 - (a) To adopt a precautionary approach to the management of GMOs by prohibiting the field-testing and release of GMOs.
 - (b) To adopt a resource management framework for GMOs that is region specific taking into account environmental, economic and social well-being considerations.
 - (c) A provision that allows for the review of the Proposed Natural Resources Plan provisions relating to GMOs, particularly if there is new information that becomes available on the benefits/adverse effects of a GMO activity.

Dated 6 June 2017

Claire Annette Bleakley

