

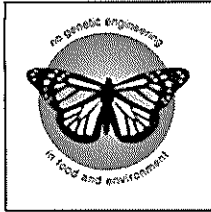
Proposed Natural Resources Plan:

Submitter:

GE Free New Zealand

Submitter Number:

S139



GE Free New Zealand

In Food and Environment Inc.

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24 September 2015

GWRC proposed Natural Resources Plan –

Dear Chair and councillors,

GE Free NZ submitted a detailed submission to you at the last round of submissions and we were hopeful that you might have added our concerns over genetically engineered organisms (GMO's) to the plan. We note there is a silence on any reference to GMO activities in any part of the proposed natural resource plan.

Our presentation on GMO's dealt with the rising level of harm that is occurring to the environment, economic livelihoods, and health of communities. Other councils in New Zealand have also acknowledged the uncertainty around the safety and risk of GMO's to their regions.

The proposed Auckland Unitary plan (PAUP) is also hearing submissions on this issue on the 28th September with the view of implementing a precautionary approach to the growing of GMO's in the region. It is important that the GWRC seriously consider the implications of the unknown risks and implement a precautionary approach until the open release for growing can be found to be safe for the greater region.

We do also note that in the original staff note to the council they considered it was a central government issue. However we did submit evidence of the *Federated Farmers of New Zealand v Northland Regional Council – NZEnvC 89 [1]* Court case that council does have a responsibility in its "duty of care".

We would like you to re consider this omission and place in your rules, objectives and policies some protection and precaution around GMO's. We note that you do have a clause on fracking waste; we ask that you add a similar precautionary one on GMO's.

In the proposed NRP objectives section, O51, hazardous substances, p.90, are mentioned we ask that new organisms be added after HS.

We ask that a totally new category is added that is emerging issues and is similar to the Bay of Plenty clauses namely wording that is precautionary for the land use of GMO's.

I refer you to the wording that was approved by Judge Thompson for the BOP regional plan in his decision at clause 29 [2] and the BOP regional policy plan 1.8 (p.10). [3]

In September 2015 the Hastings District plan implemented Policies Rules and Objectives around Hazardous substances and new organisms [4] we ask that you consider these in relation to the precautionary approach that the council has in its duty of care to its land use, water management and community health.

Yours sincerely,

Jon Muller
Secretary GE Free NZ

Cc: Claire Bleakley

[1] Federated Farmers of New Zealand v Northland Regional Council [2015] NZEnvC 89 (12 May 2015) <http://www.nzlii.org/cgi-bin/download.cgi/cgi-bin/download.cgi/download/nz/cases/NZEnvC/2015/89.pdf>

[2] <http://www.boprc.govt.nz/media/321876/environment-court-decision-18-dec-2013-env-2012-339-000041-part-one-section-17.pdf>

[3] <https://www.boprc.govt.nz/media/433849/operative-rps-1-october-2014-contents-and-part-1-updated-8-may-2015.pdf>

[4]

<https://www.hastingsdc.govt.nz/files/all/Proposed%20DP/Plan%20Text/29.1HazardousSubstancesAndGeneticallyModifiedOrganismsDistrictWideActivity.pdf>