



Proposed Waikato District Plan (Stage 1) Hearing topic 8B- Genetically Modified Organisms

Highlights package

23 January 2020

In accordance with paragraph 28 of the First Directions from Hearing Commissioners, dated 21 May 2019, the following 'highlights package' has been prepared to identify key matters where there is disagreement between the relief sought by submitters and Federated Farmers of New Zealand ("FFNZ") position, as it relates to this hearing topic.

I take this opportunity to advise that whilst Gavin Forrest, General Manager Policy and Advocacy, prepared the Hearing Statement for this topic, I will be presenting at the hearing as Mr Forrest, who is Wellington based, has existing priorities that will keep him in Wellington on Thursday 30 January 2020. I am authorised and qualified to speak on Mr Forrest's behalf, having been the North Island Regional Policy Manager for the previous 10 years.

Through this role I have worked with FFNZ board members, local elected representatives and policy staff as various councils around the North Island have worked through similar processes. This included providing advice which, in part, informed the national Federated Farmers policy position on Genetic Modification. I am based in Hamilton.

1. General

FFNZ supports the Council decision to notify the proposed Waikato District Plan without any specific provisions on Genetically Modified Organisms ("GMOs"). The topic was included for discussion in the district plan review workshops run in November 2015. The subsequent notified version provides a clear message that Council did not consider there to be any justification to place additional controls on the use of GMOs, and nothing to indicate a strong social or cultural expectation that GMO use should be banned within the district. In our view, submitters looking to change that decision have not provided enough evidence or justification to warrant the changes they seek.

2. Key areas of contention

The following table summarises the key areas of contention from FFNZ perspective.

Submitters seeking GMO controls (broad summary of relief)	FFNZ position in response
1. RMA controls are required to manage GMOs	It is accepted that a council can introduce a planning framework to control GMOs, if a resource management issue is identified, and the approach is supported by a robust s32 or s32AA analysis. To date that cost, benefit analysis has not been undertaken. The salient point is whether they should.
2. The district plan needs to adopt a precautionary approach relating to GMOs	The EPA is required to adopt a precautionary approach for all its decisions.
3. The district plan needs to adopt a prohibitive approach relating to GMOs	There are no current, imminent or future risks that need to be managed with such a heavy hand. There is no evidence to suggest a strong social or cultural expectation from Waikato communities to prohibit the use of GMOs which have been approved for use via the robust and thorough EPA process.
4. Include provisions that are the same or similar to Far North District Plan, Whangarei District Plan and Auckland Unitary Plan	It is not appropriate to 'cut and paste' provisions from other regions into the Waikato district without any analysis as to how these may fit within the Waikato context. To date that cost, benefit analysis has not been undertaken.
5. Include bond provisions to pay for possible clean-up or eradication of GMO material	The EPA is able to impose bonds or require specific insurance

3. Reasoning

FFNZ will provide further comment on the reasons and explanations submitters are using to advance their arguments during the hearing presentation. In our view, much of the evidence is either 'off point', is counterproductive for their purposes as highlights how well the EPA testing and approval process works, or makes unsubstantiated claims.