

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER 8B – GMO Hearing Waikato District Plan

**JOINT HEARING OF SUBMISSIONS BY COMMISSIONERS OF THE WAIKATO
DISTRICT COUNCIL**

**EVIDENCE OF ORGANIC DAIRY HUB COOPERATIVE NZ LTD (ODH)
ON BEHALF OF GE FREE NEW ZEALAND**

Dated 19 December 2019

INTRODUCTION

1. Name: **Organic Dairy HUB Cooperative NZ Ltd. (ODH)**
2. Address: C/- Waikato Innovation Park
P O Box 9466
Waikato Mail Centre
Hamilton 3240
New Zealand
3. Background: In 2015, 37 organic dairy farmers came together and officially formed Organic Dairy Hub, a 100% New Zealand farmer owned co-operative. We believed that by joining together as one, with one common passion, ODH would be a platform of highly skilled organic farmers. As one, our farmers work together to make a real difference on our New Zealand land, for our animals, our environment and our families. We produce organic milk for the world to enjoy. Our shareholders' goal was achieved. The dedication put in at that time to form a Co-op remains today. Our vision now is to grow and diversify beyond liquid milk whilst continuing to 'do what our farmers do best, live and breathe quality organic farming practices'. Our foundation shareholders have provided a strong base and stand proud in the Co-op they belong to.
4. Commercial Operation: Our dairy produce is sold to both Domestic and Global markets.

SCOPE OF EVIDENCE

1. Evidence will address the following matters:

How the release of certain GMO products into the environment would affect our company, our farmer shareholders, our customers both domestically and internationally, and current positive perceptions of dairy in the Waikato, particularly from a global standpoint.
2. My name is Gavin Fisher and my wife and I farm at Te Aroha on my family farm. I am a third generation farmer and our property has been Organically Certified for over two decades. I am also a Farmer Director of ODH.
3. A third of ODH Shareholder Farmers are based in the Waikato with the potential for further suppliers coming to ODH as trends and demand for Organic milk continues to grow.
4. Our farms are Certified Organic to stringent National and International Standards. This process consists of several annual audits from both MPI approved auditors and several International auditors, meaning standards need to be consistently high to meet the customer expectation both here and globally.
5. Being Certified to a range of International Organic Standards gives us access to a wide variety of markets, which means our milk is also audited to be **GMO Free**.

6. These markets come with real expectations. ODH has global customers who desire our milk because of the unique profile it has. It is natural, grass fed, New Zealand dairy from organic, Non-GMO farms. We have experienced exponential customer demand in the past twelve months demanding all range of product types (fresh milk, UHT, consumer products, powders, specialty ingredients, etc) due to the uniqueness of our milk. Global trends toward more health conscious and traceable food suggest the enquiry will continue. We have production figures we can share confidentially to illustrate this demand.

4.1.3 Genetically modified organisms

4.1.3.1 Genetically engineered organisms / GMOs and their derivatives should not be introduced or used in organic production, including plants, animals, microorganisms, seeds, pollen, sperm, eggs, other propagation materials and fertilizers, soil improvement Substances, plant protection products, plant growth regulators, feeds, animal growth regulators, veterinary medicine, fishery medicine and other agricultural inputs.

4.1.3.2 There are both organic and conventional production units, and genetic engineering organisms should not be introduced or used in the regular production part.

An example of the Chinese Standards (Reference 1)

7. We also see wider ramifications for New Zealand in general regarding the Non-GMO markets so have some quotes from recent overseas reports:

(Reference 2) 22 Aug 2019 *The proportion of shoppers shunning genetically modified foods has tripled over the past decade, according to The Hartman Group, Bellevue, Wash. Forty-six per cent of consumers surveyed last year said they actively avoid bioengineered ingredients, which compared with 15% of consumers surveyed in 2007.*

“According to the International Food Information Council (IFIC) Foundation’s 2018 Food and Health Survey, 40% of consumers view products that contain non-G.M.O. ingredients as healthier than identical products made with G.M.O. ingredients.”

“We know consumers want to know what’s in their food, and they don’t want family dinner to be a science experiment,”

(Reference 3) 13 Sept 2019 *The global non-GMO foods market size is poised to reach USD 1.10 billion by 2023, according to a new report by Technavio, progressing at a CAGR of over 17% during the forecast period.*

The increasing health awareness among consumers and the rising adoption of vegetarian and vegan lifestyles are stimulating the demand for foods that are formulated using organic and non-GMO ingredients such as grains, seeds, and fruits. The popularity of organic food products is expected to rise during the forecast period and subsequently boost the growth of the non-GMO foods market.

(Reference 4) Report June 2016 - *Identification and Assessment of Added-Value Export Market Opportunities for Non-GMO Labeled Food Products from South Australia*

The research team’s conclusion was that there are opportunities for added-value returns for Non-GM labelled food products from South Australia,

but that the: ‘Greater opportunity lies in developing a broad-based platform of ‘naturally healthy’ products from South Australia whose claims can be underpinned by a sophisticated verification system.’

This is what many of us have been doing for 20 years already with our Organic Certification, however we want to emphasise that we believe this discussion is much bigger than just an organic discussion.

8. In fact our farms are just a small sample of the many others who are farming sustainably, biologically or regeneratively, who are meeting or exceeding many of the Local Government and National Government policies around land use and water way protection. It is not just Organic farms who have been building systems to enhance New Zealand's image and the policies put in place as response to International demand.
9. But by being Certified Organic, our farms begin adding value to our products before the milk leaves the farm, expanding on the clean green image of the Waikato and New Zealand overall.
10. And while we are still a relatively new business, we already have a deep commercial ecosystem that relies on ODH supplying our product. Several businesses use only our Certified Organic milk or products. We are also an employer in the Waikato, with staff working to manage and market our Organic Non-GMO milk. This also expands into helping employ other people who are contracted to our business such as milk tanker drivers and product and industry consultants and technical specialists.
11. Environmentally, our business revolves entirely around our farms meeting or exceeding the expectations of consumers, government, and our ever-expanding customer base.
12. To continue farming this way our farms rely on various local and Government agencies to help avoid, remedy or mitigate any adverse effects or activities that might interfere with our businesses.
13. If the Waikato Organic farms making up 1/3 of our business became GMO contaminated, it would be almost impossible for ODH to remain in business.
14. And even if the risk of GMO contamination was small, from open-air field trials of pastoral grasses, the burden of proof would still fall on ODH. Through no fault of our own, it is unfair for this burden of proof to fall on ODH which would incur time delays and huge costs through testing to satisfy customer demands.
15. The boundaries preventing the spread of GMO grass seeds by wind, birds, floods, and accidental mishaps cannot be fully secured. This has been shown frequently overseas where contamination has destroyed farming businesses as they know it. (Reference 5,6)
16. Organic farmers need confidence that contamination of their ecosystems will not occur, and their businesses are not put at risk by circumstances involving GMO's.
17. The track record of GMO trials so far in New Zealand has not been great, both in outcomes or in terms of security or management, to put it mildly. (References 7,8,9)
18. We have been very lucky that these trials have so far not involved Open Pollenated grasses, because New Zealand Inc relies on our pastures.
19. One example of International failures is of a grass escape in the USA that could happen in NZ is the Creeping Bentgrass (Reference 10). While this grass is not directly affecting the farmers (this time), it is clogging the waterways. The storm

which spread the seeds sent them 13 miles down wind. The Waikato region does not need another “accident” in the waterways, like the Koi Carp problem.

20. A second example (Reference 11) Saskatoon—On June 14, 2018, *the Canadian Food Inspection Agency (CFIA) released information about an incident in Alberta where a small patch of unapproved genetically modified wheat was discovered. The wheat plants have a glyphosate resistant herbicide tolerance trait that was developed and tested by Monsanto in open-air field plots fifteen to twenty years ago. The nearest test plot site is over 300 kilometers from where the contamination incident was discovered*
21. And a third example (Reference 12) -Genetically modified wheat has been discovered growing in a field in **Washington State**, according to a United States Department of Agriculture announcement on Friday (June 7 2019) *There are no approved genetically engineered (GM) wheat varieties, although GM versions of the plant have been identified in isolated incidents in two other US states—**Montana and Oregon—and in Alberta, Canada, since 2013.***
22. Keep those incidents in mind when you hear others talk about how coexistence and buffer zones might work to enable different farming systems to co-exist. Because NZ’s economy is based around our extensive pastoral based system, we ask you to consider how something as prolific and promiscuous as grass can ever be controlled by a line on a map. As well as the above examples, ask city people who suffer from grass pollen allergies how far the pollen affecting them has travelled as an example. We live on islands with a strong westerly wind flow that sends grass and pine pollens many kilometres. Our customers know this and will be very sceptical of any open air release.
23. As a farming business trading on our GMO-Free status, having read the Section 42A Report prepared by Neil Taylor for this hearing, and a report prepared by Mai Chen for the Organic Sector Forum in 2014 (Reference 13), we are left believing the boundaries between the HSNO Act, the EPA and the RMA are not as clear as we need them to be.
24. Should an Open Air Trial or an escape of open pollinated grasses happen, we don’t have time to wait for the system or the Courts to decide who is responsible. This could take 1 or more seeding seasons by which time the genie is well and truly out of the bottle and it would be more than just our business in trouble. As pointed out above, all of New Zealand’s Non GMO primary production exports will be at risk.
25. The makers of any new product going to market are held to account through various agencies such as the Consumer Guarantees Act, LTSA etc.
26. We think the makers of new products that are both alive and breed pose a greater risk than any inanimate object. They need to be held to higher standards because of the higher risks involved.
27. As a Farmer, not as a Director of ODH, I have in the past approached my insurance company, whose whole business is that of assessing risk, to see if I could get GMO cover. I have been told they don’t provide cover for this, which tells me they are not confident enough to cover this matter because of the risk and potential financial implications that come with that risk.

RECOMMENDATIONS

28. The Hearing Committee to amend the Proposed Waikato District Plan to include the following:
1. A resource management framework for the management of GMOs that is regionally specific and considers environmental, economic and social well-being considerations. These need to set out the legal responsibilities of any GMO proposals.
 2. Strong precautionary and prohibitive provisions, policies and rules relating to GMO land use implemented.
 3. Wording that duplicates or is consistent with the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan, to ensure a consistent approach across Northland, Auckland and the Waikato and to eliminate cross boundary issues.
 4. Consents on all actives that involve GMO's should automatically be publicly notified.

Dated - 20/12/2019

Signed - Gavin Fisher

Farmer Director of the Organic Dairy HUB

REFERENCES

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