

My name is Peter Davis, I am the current chair of Organic Farm NZ, a New Zealand-based organic certification organization that provides affordable certification for small-scale organic farmers. It was established in the early 2000s to support growers who are focussed on local and domestic markets rather than on exports.

Our members are very concerned about the regulatory changes included in this Bill.

Organic production worldwide excludes the use of GMOs.

The International Federation of Organic Agriculture Movements is the global umbrella organization for organic agriculture. It prohibits GMOs in all organic farming and food processing. The IFOAM Standard states:

“Genetic engineering and genetically modified organisms are incompatible with the principles of organic agriculture and shall not be used in organic production and processing.”

In other words, there is zero tolerance for genetically modified organisms (GMOs) in an organic system.

To date OFNZ members have had sufficient certainty that the inputs for their growing systems - the seeds, seedlings, compost materials, organic fertilisers including fish and seaweed products, biological activators and products used to manage weeds and pests do not include GMOs.

They have also had the confidence that GMO contamination of their properties due to wind-blown or water-borne or introduction via visiting animals would not occur.

This means our growers have not had to engage in prohibitively expensive testing to identify and avoid GMOs that might be in their inputs or the surrounding environment, and have thus been able to meet the certification requirements that their products are free of GMOs.

This is largely thanks to the precautionary regulations that are in place currently and which were heavily influenced by the outcomes of the Royal Commission that also took place in the early 2000s.

Taking a precautionary principle we believe is essential with a technology such as GM and should not be negated by this Bill.

We believe that a technology that has inherent problems in regard to the risk, uncertainty and unpredictability of its effects on natural ecosystems and human health requires us to be cautious.

In our opinion GMOs should be kept out of the environment and out of the agricultural supply chain. This requires adequate containment measures to ensure that accidental introduction of GMOs into the environment is not possible..

Should releases be permitted, then for Organics to co-exist alongside GMOs organic producers need to be able to reliably avoid all risks of contamination from GM inputs with no imposition of **extra** cost on them. Avoidance of any accidental introduction of GMOs due to the lack of labelling and traceability is also a requirement. For this to be possible there needs to be a high degree of regulatory control to ensure that accidental release or spread of GMOs - or their presence in other products used as inputs - is not possible.

We contend that the principle of Polluter Pays should be applied fully, meaning that all and any related costs for containment, traceability and labelling be borne by those seeking to benefit from the introduction of GMOs. And that there should be no scope to allow them to externalise these costs to the community or other sectors such as ours.

In other words if this Bill is to proceed then it requires clear and robust liability rules that ensure that those embracing GMOs, not organic farmers or the community, bear the full responsibility and costs for preventing any contamination that may result.

In our view the current bill has inadequate provisions to manage the substantial risks that the Bill would introduce.

Further the lack of consultation in its development stages and the speed with which it proposes to introduce major changes amplifies these risks. I believe this concern is echoed by many in the agricultural sector - not just the organic producers. This is a technology that carries such high risks that the formulation of any new regulations should not be rushed, and should only come into effect after significantly more consultation with the wider primary sector including organic growers.

In terms of the actual workings of this suggested regime, **firstly** too much power is being granted to a single minister. As with the modifications made to the Fast Track legislation we believe it is critical for there to be no opportunity for suspicion of any collusion or corruption to occur.

Secondly the responsibilities being placed on a single regulator inheriting such rushed legislation are too onerous and this needs to be rethought and be extended to become the responsibility of a wider group of experts

Any new **regulatory regime needs significantly** more scientific input, and needs to ensure the precautionary principle is applied throughout.

All research and testing for GMOs in primary production should be confined to containment facilities.

There should be a requirement that all products are assessed for risk on a case-by-case basis with full liability on the proponents.

And as I have said before, any costs of containment, of developing and delivering fool-proof systems for traceability and labelling of products containing GMOs must be borne by those who seek to benefit from the proposed de-regulation.

Twenty years ago, the Royal Commission gave the issue of the regulation of GMOs a thorough, intense and in-depth review.

By contrast, this legislation has been rushed, has had inadequate consultation with the sectors involved, and risks damaging the reputation New Zealand's primary sector has established around the globe as well as the trust of consumers seeking GMO-free food sources.

Is it time for a second Royal Commission to more fully take stock of what New Zealand actually needs in terms of a new regulatory framework particularly as it affects the agricultural sector?

We recommend that parliament abandons the Bill - or at least hits Pause with regard to the agricultural sector. Let us continue under the current regulation of genetic engineering provided for in the existing legislation, as the current regulatory framework is, in our opinion, for organic farmers, still fit for purpose.

We ask that you do not let this proposed legislation proceed as is, we do not need a 21st century GMO equivalent of the introduction of rabbits, possums and stoats to New Zealand with the ensuing costs that the nation and environment have to bear in perpetuity.