



## Sign on : Against GE Trees in New Zealand

### **Personal submission on the Proposed National Environmental Standard for Plantation Forestry 11 August 2015**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I write to detail my opposition to the standard in its current form. Specifically, I write to oppose the Proposed Standard – NES & other relevant legislation: 6.4 - Genetically modified tree/root stock (p. 43, Appendix 3, Afforestation, p. 64 & Replanting, p. 82).

I write to oppose the inclusion of text that will override more than 12 years of work by local councils to create a much needed tier of additional precautionary protection against the risks of outdoor use of GMOs.

The following is my personal submission;



# Sign on : Against GE Trees in New Zealand

## **A strategic attack on local democracy**

Pure Hawkes Bay commissioned a Colmar Brunton poll in 2013 in which four out of five New Zealanders thought councils should be able to keep their districts GE-free using local plans. New Zealanders do not want GE organisms released anywhere in Aotearoa.

The removal of the ability of local council authority to make regional precautionary based decisions to support this reality through the current form of the NES-PF comes across as a cynical move that appears to have been strategically made with the aim of bypassing, overriding and silencing New Zealanders in this regard.

New Zealand became Nuclear Free through citizens democratically urging their local councils to reject nuclear technology. This move by the government effectively takes away New Zealander's rights to develop locally appropriate democratic responses to GE in the same way. Rather, it hands this decision over to a central government agency [the EPA] with a poor record of ensuring effective controls on GE field trials. Furthermore, this agency which is supposed to represent the interests of New Zealanders who clearly are opposed to the release of GE organisms will be headed by an active advocate of genetic engineering.

Conflicts of interest have been exposed in the EPA (previously as ERMA) approvals process with Kieran Elbrough who had worked for AgResearch, being part of the decision making for AgResearch's GE animals application.

If this isn't a strategic campaign to silence New Zealander's on behalf of pro-GE companies then I don't know what is. This will not be accepted by New Zealanders or those watching from other parts of the world.

It is critical that local communities maintain their local democratic processes regarding regional release of GE Trees in line with their own values and interests in this issue.

Taking these rights away will trigger widespread condemnation both here and abroad.



# Sign on : Against GE Trees in New Zealand

## **An ignorant attack on international diplomacy: The precautionary principal and the processes and instructions of the United Nations Convention on Biological Diversity.**

The Convention on Biological Diversity passed a formal declaration at its Eighth Conference of the Parties in Curitiba, Brazil on 31 March 2006 to recognize the threats posed by genetically modified trees, urging all countries to approach the technology with precaution. New Zealand is a party to the convention. [1]

Several councils have sensibly followed this advice by adding a precautionary layer of protection against the release of GE Trees in their regions, but the government seems to think it knows better than the 170 or so delegations that supported this instruction at the UNCBD in 2006.

The UN instruction urges against threatening the environmental release of GE trees until research can show that any possible negative impact can be ruled out, including impacts on the livelihoods of indigenous and local communities everywhere. Moving against it threatens international condemnation and ridicule.

The removal of such precautionary based council authority over the release of GE Trees suggests that the government is placing the interests of certain elements of the forestry industry ahead of instructions issued by the United Nations and the common sense approach of the use of the precautionary principle by local councils.

Wood and wood products are globally traded resources. The weakening of protections against the release of GE Trees in New Zealand threatens not just local and national, but also international ranging contamination that could impact on people who are party to this sensible UN decision.

At the last IUFRO Tree Biotechnology Conference, which took place in Asheville, NC (US) in 2013, huge protests against genetically engineered trees disrupted the five-day conference, as was the case at the conference in Italy. There is widespread opposition to this technology globally and a growing network of people ready to stop it from being deployed against them.

This brings us to another aspect of the precaution, the existence of a need for the activity (commercially releasing GE Trees) in the first place.



# Sign on : Against GE Trees in New Zealand

*“The pursuit of genetic engineering in forest research is principally corporate, shaped by the imperatives of private investment, market forces and government regulatory institutions. Novel forest tree phenotypes are created as a means to increase shareholder value of investor companies.*

- Claire Williams, transgenic tree researcher at Duke University;

## **Who needs GE Trees?**

So why would anyone want to remove these precautionary measures at all?

The 100,000 people who wrote to the Brazilian government earlier in the year demanding that they do not authorise the release of GE Eucalyptus in their lands don't need GE Trees.

Four out of five New Zealanders believe that councils should be able to keep their districts GE-free.

I am not aware that the people of New Zealand have been writing to their government in their thousands begging them to allow them to plant GE Trees, but obviously there is an active minority of people and companies wanting this.

Questions about who had been lobbying MPI for the inclusion of the pro-GE Tree text in the NES-PF at the public meeting in Rotorua were not adequately answered.

I also note that the inclusion of these pieces of text in the NES-PF were only made public immediately after SCION representatives had returned from a trip to Florence, Italy where OUR money was used to co-sponsor The International Union of Forest Research Organizations' (IUFRO) highly controversial Tree Biotechnology Conference. This did not go unnoticed by our friends involved in the international campaign to stop GE Trees.

The installation of a GE advocate to run the EPA whilst simultaneously silencing local voices stinks of antidemocratic corruption and collusion with private forestry companies both here and abroad.

All of this paints a picture of a government and ministry that seems incapable of accepting the reality of New Zealander's opposition to the commercial release of GE Trees in their country.

Not a good look in terms of New Zealand's international reputation.



# Sign on : Against GE Trees in New Zealand

## **Environmental and economic risk**

Part of the threat from GE pine trees comes from the dangers of transgenic pollution from GE tree pollen, or horizontal gene transfer which could have unintended adverse impacts on the environment (including harm to NZ soils, beneficial insects and indigenous biodiversity).

Another risk is lowered productivity from toppling and snapping of pines that already are prone to that problem, posing further risk to forestry workers and the industry itself in terms of sustainable production of product.

Such impacts are likely to include destruction of biodiversity, loss of fresh water, desertification of soils, collapse of native forest ecosystems, and major changes to ecosystem patterns. Globally, there would also be impacts on Indigenous and forest dependent communities including forced displacement, loss of livelihoods, foods and food sovereignty, medicines, culture and shelter, as well as impacts on human health.

## **Disabling choice and Forest Stewardship Council certification**

GE trees / pines could also cost a neighboring forester or property owner their hard won Forestry Stewardship Council (FSC) certification. This is not about enabling choice, it is about taking it away.

The FSC has identified a number of other legitimate scientific concerns about the safety and appropriateness of planting genetically engineered trees including asexual transfer of genes from GMOs with antibiotic resistance to pathogenic micro-organisms, increased resistance of target insect pests, reduced adaptability to environmental stresses, increased invasiveness in GMO trees with new features, and the spread of herbicide resistance genes.

A prestigious global certification body, the FSC only endorses truly sustainable forestry practices, and its position on GE is very clear- “we do not allow genetic engineering of trees.”





# Sign on : Against GE Trees in New Zealand

## Health risks

Pollen, which already causes health impacts for forestry workers in New Zealand can enter the blood stream through the lungs. Nobody knows what the consequences of genetically engineered pollen entering the blood stream of forestry workers, or anyone else could be.

If GE Trees are released into our environment, forestry workers, their families and those living in the vicinity of genetically engineered plantation forests, or any ecosystems infected by them, which could be anywhere in New Zealand will become subjects of an experiment conducted upon them whether they like it or not.

Essentially, someone else has, on their behalf, decided that this is a risk that these communities should take so that they can develop and release GE Trees into their local environment.

Handing this authority over to a central government body headed by a GE advocate restricts the ability for local communities to protect them from the likes of GE pollen release. Local communities, not forestry lobbyists should be the ones who decide whether or not they are subjected to potentially life-threatening experimentation on behalf of forestry companies wanting to release GE Trees in their regions. There are enough workers dying in the forests already due to the greed of forestry companies and their disregard for worker's safety.

MPI should not weaken or remove the ability for workers to protect their health at a local level.

If GE Tree release goes ahead, the New Zealand Government should expect significant resistance from organised workers and their families – likely carried out in collaboration with enormous workers and peasant movements overseas facing similar threats to their lives and livelihoods.

You will notice that some organisations that are deeply involved in these struggles have already signed on to the sign on statement at [www.stopgetrees.org.nz](http://www.stopgetrees.org.nz).



# Sign on : Against GE Trees in New Zealand

## **GE Trees and the New Zealand government's woeful response to climate change**

The plantation forestry / carbon sink approach to managing greenhouse gases has been described as New Zealand's primary excuse for inaction on climate change since signing on to the Kyoto Protocol, "in bad faith", in 1997. It is accepted by many climate change experts and campaigners that New Zealand lobbied for the use of land based sinks in order to conceal the reality of its greenhouse gas emissions and provide cover for the dairy industry. Little has changed since.

The release of GE Trees will threaten the functioning of native forests both here and abroad which are currently holding back the sudden destabilisation of our climate. If we want to avoid catastrophic runaway climate change, we should be adding layers of legislative protection to protect the integrity of existing natural carbon sinks rather than removing them.

Additionally, the synthesising and subsequent commodification of natural systems through the private development of GE Trees enables the privatisation and monopolisation of our response to catastrophic runaway climate change.

The potential addition of GE Trees to this international carbon accountancy sham will only make matters worse in terms of New Zealand's reputation as a laggard on climate change.

Our most vocal environmental NGOs are aware of the moves being made to remove restrictions on the release of GE Trees here in New Zealand and will understand how that relates to New Zealand's climate change cynical response to climate change in terms of carbon offsetting.

You will notice that a number of international organisations that are involved in the UNFCCC process and are actively involved in efforts to stop the release of GE Trees internationally have already signed on to the statement at [www.stopgetrees.org.nz](http://www.stopgetrees.org.nz), including the largest grassroots environmental network in the world, Friends of the Earth.

For more information on why GE Trees are not a climate change solution see link [2] below.

It should not be expected that all of this will go unnoticed at a time when the government's inadequate and deceitful response to climate change is in the international spotlight in the run up to the UNFCCC climate negotiations in Paris this year.



# Sign on : Against GE Trees in New Zealand

## **GE forestry threatens New Zealander's ability to adapt to climate change**

My personal work on climate change has centred on issues of climate justice, which recognises that the voices and wellbeing of those peoples most severely affected by and vulnerable to the effects of climate change must be placed at the forefront of decision making in the consideration of climate change solutions.

Climate change is upon us with the impacts being felt most severely by people living nearby and dependent on climate-vulnerable ecosystems, including both native and plantation forests.

Maintaining and indeed strengthening local democratic tools and processes is key to bringing about effective, fair and locally appropriate responses to climate change for workers, communities, iwi, yet this proposed NES-PF in its current form does the opposite in relation to GE Trees and other aspects of plantation forestry management.

The ability of local communities to make decisions regarding their own futures in terms of local management of their unique bioregions must be enhanced rather than restricted if they are to have the flexibility to adapt to the uncertainty of climate change impacts.

The removal of this flexibility and handing of it to central government threatens the lives and livelihoods of communities in the name of "efficiency", cost-cutting and preferential treatment for forestry corporates. The draft NES-PF simply threatens people's futures so that forestry companies can make more profits.

If coal mining communities, for instance, are to have any say in what a fair and effective transition to plantation forestry based local economies will look like, they're going to need to maintain their ability to make their own regional decisions about how plantation forestry is managed regionally.

The ability for communities to formulate their own unique and regionally appropriate responses to commodity price shocks, fuel scarcity, food sovereignty issues, water allocation and weather related threats through the management of local resources including forestry management is key to ensuring their future safety and wellbeing. These decisions shouldn't only be made by people sitting in offices in Wellington who won't be personally affected by them.

We've already said no to GE in New Zealand, as had the people of Brazil before their government caved to pro-GE Tree lobbyist vultures in March this year. I urge you not to do the same.

We need more democratic tools to help us adapt to a changing climate, not less.





# Sign on : Against GE Trees in New Zealand

## **Proposed amendments**

Remove all GM clauses in the proposed NES – PF and references permitting genetically modified organisms to be the sole responsibility of the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms Act (HSNO) and

Retain and provide for Local Bodies to place more GM stringent land use rules, objectives and policies in their plans for the management of the natural and physical resources through their mandated planning functions' under the Resource Management Act (RMA).

Protect the Local Bodies mandate and duty of care, under the RMA, to the existing foresters, primary producers and businesses in their region and districts so they can maintain their responsibilities with national and global certification bodies.

Ensure that the Regional and District Councils have the ability, under the RMA, to create a much needed additional tier of local protection against the risks of outdoor release and use of GMOs.

## **The decision I would like the Minister to make**

1. Remove all wording in the NES-PF in 6.4 p.43, Appendix 3; Afforestation: p. 64 & Replanting: p. 82, referring to genetically modified trees and rootstock.
2. Place an added condition in the proposed NES-PF stating that Local Bodies can set more stringent rules, objectives and policies on GMO's as part of their land use planning function, under the RMA, when addressing the economic, social and cultural wellbeing of their communities.

Sincerely,

Gary Cranston  
Member of Auckland GE Free Coalition

---

## **References**

- [1] CBD decision: <https://www.cbd.int/decision/cop/?id=11648>  
[2] <http://www.econexus.info/publication/genetically-engineered-trees-no-solution-global-warming>