

## Meagan Walters

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**From:** Linda Grammer <linda.grammer@gmail.com>  
**Sent:** Sunday, 29 June 2025 7:08 pm  
**To:** District Plan Review  
**Cc:** Meagan Walters  
**Subject:** submission by Linda Grammer & family in response to the KDC Proposed District Plan  
**Attachments:** Gene Technology Bill submission from Northland Regional Council (signed and submitted).pdf

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**Submission to: KDC Proposed District Plan  
Kaipara District Council  
Private Bag 1001, Dargaville 0340  
Northland**

**Submittor:  
Linda Grammer & family**

**Contact details:**

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Te Tai Tokerau**

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**Please note: email contact preferred:**

**E: [linda.grammer@gmail.com](mailto:linda.grammer@gmail.com)**

**I am a member of Concerned Farmers NZ, Rural Women NZ, Te Waka Kai Ora, Horticulture NZ, the International Plant Propagation Society (IPPS), and GE Free Northland (in food & environment)**

**Thank you for the opportunity to lodge a submission. We wish to be heard.**

- I/we could not gain an advantage in trade competition in making this submission**
- I am/we are not directly affected by an effect of the subject matter of the submission that**
  - (a) Adversely affects the environment; and**
  - (b) Does not relate to trade competition or the effects of trade competition.**
- I/we do wish to be heard in support of our submission and would consider making a joint presentation with other like minded submitters**

**Our farming family, with valuable enterprises in Whangarei District including but not limited to the Maungakaramaea area, is extremely concerned about**

**-KDC inappropriate proposal to only have a "Rural Zone" in the KDC proposed District Plan. We want to see the Primary Production Zone reinstated in the KDC proposed District Plan (so that there is a "Primary Production Zone" and "Rural Zone" in the District Plan, recognising the importance of the Primary Production Zone for agriculture, horticulture, apiculture, and forestry). In our and our Kaipara farming colleagues view, highly productive soils (land use capability 1,2,3) must be protected from subdivisions and other non- food production activities. We note that council is obligated to protect natural and physical, finite resources like soils. Healthy soils underpin all primary production. Soil is a crucial building block for New Zealand's agriculture, horticulture, forestry (native and exotic) and other land-based primary industries. It's important we protect and monitor our land and soil to ensure it remains healthy and productive (and is not lost through subdivision and other land use changes that undermine our rural community, economy, Outstanding Landscapes and indigenous biodiversity).**

**See: General Rural & Rural Production Zones – page 288 - 308. The objectives and policies specifically. The unwise removal of the Rural Production Zone was a key and highly inappropriate change from the KDC draft District Plan in the same way the controversial, "behind closed doors" removal of the excellent GMO chapter (in the KDC draft District Plan/ Exposure Draft September 2022) was/ is.**

**- the significant omission in the KDC Proposed District Plan as relates to GE/GMOs (Genetically Modified Organisms).**

## **GE/GMOs**

**We were an original submitter to the KDC draft District Plan (Exposure draft publicly released in September 2022).**

**As primary producers, we wholeheartedly supported (and continue to support) the precautionary and prohibitive GE/GMO provisions, policies and rules in the KDC draft District Plan (Exposure draft). But we wish to see this (slightly strengthened provisions) in the KDC Proposed District Plan and the final adopted District Plan.**

**We thank KDC for working (since 2003) in a collaborative and fiscally responsible manner with all the other councils of Northland and Auckland to address the risks of outdoor experiments/ field trials and/or releases of GE/GMOs and take action to protect local farmers and other ratepayers. We also thank KDC for being an inaugural member of the Northland/ Auckland INTER COUNCIL WORKING PARTY ON GMO RISK EVALUATION AND MANAGEMENT OPTIONS (along with WDC) and working to constructively liase with all councils from south Auckland to Cape Reinga to protect the rohe from the risks of outdoor GE/GMOs.**

**See**

**<https://www.wdc.govt.nz/Council/Council-documents/Reports/Genetic-Engineering-Review>**

**We have been farming in the Maungakaramaea area near the Tangihua forest for nearly 30 years. Although we have lived and worked in Whangarei District for many years, we are very aware that GE/GMOs do not respect boundaries and that KDC must put in place robust protections on land to protect not only Kaipara's biosecurity, wider environment and existing GE/GM free primary producers and their valuable enterprises, but to help protect the wider region. KDC is also obligated to act in accordance with the operative Northland RPS and Northland Regional Plan, which has precautionary and prohibitive GE/GMO provisions, policies and rules (land and the Coastal Marine Area/ CMA).**

**Known vectors for GE/GMO contamination include wind, pollen, seeds, vegetative material, animals, insects, soils, Horizontal Gene Transfer (HGT), machinery, floods and other extreme weather events, storage facilities and human error.**

**We support the wording below from the KDC draft District plan:**

**GMO - Genetically modified organisms**

**KAIPARA DISTRICT COUNCIL**

**"Overview**

**The Council has decided to take a precautionary approach to prohibit the release of any genetically modified organisms (GMOs), due to the scientific uncertainty on natural resources and ecosystems and because the risk in some cases could be irreversible.**

**Primary Productive activities are an important land use in the District and are major contributors to the local and regional economy.**

**This precautionary management of GMO is consistent with the District plans of adjoining councils (Whangarei and Far North). The Northland Regional Plan also manages GMO in the Coastal Marine Area (CMA) on the same principles."ENDS excerpt**

**But in addition to the above wording,**

**The operative Northland "Regional Policy Statement" (RPS) has precautionary and prohibitive wording, including GE Policy 6.1.2. The agreed provisions support the implementation of proposed Regional Plan Policy D.1.1 (4), which requires an assessment of adverse effects on tangata whenua or their taonga when outdoor use of GE/GMOs is proposed. The GE/GMO issue is identified in the RPS as an Issue of Significance for Northland tangata whenua and a particular issue of concern regarding the risks to indigenous biodiversity/ taonga species.**

**We also ask that you add a further point to policy GMO-P8 –6. "Annual trial and monitoring report outcomes are provided to the Kaipara District Council".**

**Also, regarding the GMO terminology in TEMP R4,  
please change the wording from "Outdoor release of GMO"  
to "Conditional and Full Release of GMO".**

**This is in line with the Hazardous Substances and New Organisms (HSNO) GMO classifications.**

**Please ensure that the KDC precautionary and prohibitive GE/GMO provisions and other wording align with what WDC and FNDC have already achieved in their operative District Plans (FNDC GE/GMO plan change #18 and WDC GE/GMO plan change #131).**

**Also, please ensure that you clearly note in the precautionary and prohibitive GE/GMO provisions that GMOs (Genetically Modified Organisms) include controversial and risky CRISPR/ gene edited organisms. They are GMOs under NZ law and as ruled by the highest Court in the EU.**

**Thank you for taking action to help create an enforceable GM Free Food Producer Region/ zone from the Bombay hills north to Cape Reinga and specifically protect the land of Kaipara District.**

**We thank you and all the other Northland/ Auckland councils who have taken action in the face of central government inaction and significant deficiencies in the Hazardous**

**Substances and New Organisms (HSNO) Act. Deficiencies in HSNO (as identified by Local Government NZ, the Northland/ Auckland ICWP on GMOs, Hastings District Council, Bay of Plenty Regional Council and others) include no mandatory requirement for the EPA to take a precautionary approach to outdoor GE/GMO applications and inadequate liability provisions. The HSNO Act needs strengthening, not replacing with weaker regulations.**

**KDC should act in keeping with the findings of the Northland/ Auckland "Inter Council Working Party on GMO Risk Evaluation & Management Options", the wishes of local ratepayers and residents who do not want to have risky outdoor GE/GMO experiments, field trials, or releases in the Kaipara. It is not enough for council to rely on a national regulator- council should ensure that local protections against the risks of outdoor GE/GMOs are in place, including the requirement for bonds/ strict liability to ensure that polluters are accountable for unintended/unforeseen adverse impacts of EPA approved outdoor GE/GMO experiments or field trials.**

**In addition, we urge KDC to support the precautionary and prohibitive GE/GMO policies of all Tai Tokerau mana whenua for their respective rohe.**

**We also wish to note that the NZ organic standards do not allow any use of GE/GMOs and there is no GE "contamination threshold" permitted, including adventitious presence. It is of critical importance that KDC prioritize sustainable integrated management and protect conventional, IPM and organic /regenerative primary producers.**

**Organic primary producers include Maori organic certified produce (Hua Parakore) under Te Waka Kai Ora.**

**The precautionary GE/GMO provisions, policies and rules need reinstating into the KDC Draft District Plan to the same standard as NRC, WDC, FNDC and Auckland Council. This is important in order to protect the District's (and wider Regions') biosecurity, wider environment, economy, valuable "Northland, naturally" brand, existing GM Free farmers/ primary producers, our food sovereignty, and the ability of Kaipara residents to grow and eat clean and safe, nourishing, GM free food. It is also important to uphold the rights and wishes of various Tai Tokerau Iwi for their respective rohe.**

**We strongly object to any outdoor GE/GMO experiments, field trials or releases anywhere in Northland, including Kaipara, which could have unintended/unforeseen adverse impacts. At the very least, there would need to be a strict liability regime to protect landowners, farmers, and other ratepayers due to the risk of unintended/unforeseen adverse impacts of EPA approved outdoor GE/GMO experiments, field trials, or releases. Good intentions are not good enough.**

**Given the direction in the operative Northland Regional Policy Statement (RPS), concerns of tangata whenua, existing case law, the findings of the ICWP on GMOs, and consistency with adjoining district plans it is considered appropriate to reference and control these matters in the Kaipara District Plan (as it already is in the operative Whangarei District Plan and operative Far North District Plan).**

**Relief sought: reinstate the precautionary and prohibitive GE/GMO provisions into the Kaipara Proposed District Plan consistent with the wording contained in the KDC draft District Plan (September 2022 Exposure Draft document) strengthened in keeping with our submission, the findings of the Northland/ Auckland ICWP on GMOs, and the direction clearly provided by the Northland Regional Policy Statement (RPS) on Genetically Modified Organisms (GMOs).**

**-reinstate the Precautionary approach to GE/GMOs in keeping with the wording/ provisions of the KDC draft District Plan and various operative Long Term Council Community Plans (LTCCP's or LTP's) since 2004**

**"The Council has decided to take a precautionary approach to prohibit the release of any genetically modified organisms (GMOs), due to the scientific uncertainty on natural**

**resources and ecosystems and because the risk in some cases could be irreversible." (from the KDC Exposure Draft Sept 2022)**

**resinstate the Primary Production Zone (protect our first class farming/ horticultural soils from subdivision and other inappropriate development on this finite resource of such importance to rural communities, our economy, farmers and other primary producers)**

**Thank you. We wish to be heard. Please keep us informed.**

**Further information:**

**See attached- Northland Regional Council submission in response to the controversial, extreme, impractical, and undemocratic proposals in the Gene Technology Bill**

**"Regional and district plans reflect the values and priorities of our communities. In Northland, our current regulatory regime governing GMOs is the result of many years of community engagement and collaboration across district and regional councils. This framework is built on the collaborative efforts of Far North District Council, Kaipara District Council, Whangārei District Council, the then Rodney District Council and NRC. The outcome of this work is a planning and regulatory system that recognises the unique environmental, cultural, and economic contexts of our region.**

**Regional and district plans are essential tools for managing sustainable use and development and the impacts of activities on our environment and communities. They allow for tailored approaches that consider local biodiversity, agricultural practices, and the protection of indigenous species and values of Northland communities.**

**The Regional Policy Statement for Northland directs that we take a precautionary approach to GE/GMO use where the effects are scientifically uncertain, unknown, or little understood but potentially significant. This direction is reflected in the Proposed Regional Plan by providing for research and trials within contained laboratories, medical applications or veterinary applications as a permitted activity. Field trials require resource consent, as a discretionary activity, to provide for public participation in the process and to allow effects on the local environment to be assessed.**

**General releases of GMOs are prohibited. The intent is not to prevent the general release of GMOs in Northland, but rather to trigger a plan change process. This provides for a high level of rigour and public participation, in line with the potential for significant environmental effects.**

Council is strongly opposed to the provisions in the current bill which would void existing district and regional regulations and significantly reduce the local participation in decision making relating to gene technology use. These provisions in the Bill undermine many years of collaboration across Northland's local authorities to bring about a cohesive planning regime that represents the values of Northland communities.

Council is of the strong view that regional and district plans should continue to play a part in the management of GMOs in Northland, and in doing so, continue to provide for the input of mana whenua / mana moana into decisions that affect the region."- ENDS excerpt from NRC 17 February 2025 submission

### from the farming press

"A race to the bottom we'd gladly lose"



[Guest writer](#)

May 16, 2025

The rush to open up GE technology in New Zealand is fraught with risks, says Hawke's Bay farmer Jane White.

<https://www.farmersweekly.co.nz/opinion/a-race-to-the-bottom-wed-gladly-lose/>

11 Feb 2025 • Ashburton Guardian

Gene tech bill "a slap in the face to farmers, experts"

<https://www.guardianonline.co.nz/news/gene-tech-bill-a-slap-in-the-face-to-farmers-experts/>

Mt Somers farmer Duncan Humm said the bill is a "slap in the face - to farmers, agronomists and experts."

"We've got to think of what New Zealand has achieved while other countries have gone down that [gene editing] road.

"We are the best of the best in a lot of areas, and we haven't had to use that tech."

The NZ Farming content curator said farmers cannot afford to experiment with their income and livelihood.

"There's no hardcore evidence to suggest anything is practical or feasible with this technology.

"So it seems like one hell of a gamble on something that's completely unproven.

"Agriculture in New Zealand is worth something like \$56 billion in exports, so why would you gamble all of that on something that might not work?"

Wednesday, 29 January 2025

"Do not rush Bill and shut the farmers out"

<https://www.odt.co.nz/opinion/do-not-rush-bill-and-shut-farmers-out>

"Getting the Gene Technology Bill right for farmers"



[Guest writer](#)

April 22, 2025

**Regulation of all GMOs is critical, say these three hill country sheep and beef farmers.**

**The rush to push the Gene Technology Bill through parliament is unfathomable, say hill country sheep and beef farmers Ruth and Mike Williams and Nick Collins.**

<https://www.farmersweekly.co.nz/opinion/getting-the-gene-technology-bill-right-for-farmers/>

January 2025

"The Risks of GMO Deregulation to NZ Farmers"

<https://www.concernedfarmersnz.org/news/nzier-report-on-potential-cost-of-regulatory-change-54pya-ngzgb>