

## Submission Form (Form 5)

# Submission on Proposed Kaipara District Plan

Form 5: Submissions on a Publicly Notified Proposed District Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

### Return your signed submission by Monday 30 June 2025 via:

**Email:** [districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz) (subject line: Proposed District Plan Submission)

**Post:** District Planning Team, Kaipara District Council, Private Bag 1001, Dargaville, 0340

**In person:** Kaipara District Council, 32 Hokianga Road, Dargaville; or  
Kaipara District Council, 6 Molesworth Drive, Mangawhai

If you would prefer to complete your submission online, from 28 April 2025 please visit:

[www.kaipara.govt.nz/kaipara-district-plan-review/proposed-district-plan](http://www.kaipara.govt.nz/kaipara-district-plan-review/proposed-district-plan)

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

**Full name:**

**Phone:**

**Organisation:**

(\*the organisation that this submission is made on behalf of)

**Email:**

**Postal address:**

**Postcode:**

**Address for service: name, email and postal address** (if different from above):

### Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

### Please tick the sentence that applies to you:

I could not gain an advantage in trade competition through this submission; or

I **could** gain an advantage in trade competition through this submission.

**If you have ticked this box please select one of the following:**

I am directly affected by an effect of the subject matter of the submission

I **am not** directly affected by an effect of the subject matter of the submission

**Signature:**



**Date:**

(Signature of person making submission or person authorised to sign on behalf of person making the submission.)

**Please note:** all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

I **do not** wish to be heard in support of my submission; or

I do wish to be heard in support of my submission; and if so,

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

<b>(1)</b> The specific provisions of the Proposed Plan that my submission relates to are:		<b>(2)</b> My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		<b>(3)</b> I seek the following decisions from Kaipara District Council. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Chapter/Appendix/ Schedule/Maps	objective/policy/rule/ standard/overlay	Oppose/support (in part or full)	Reasons	

Add further pages as required – please initial any additional pages

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

**Submission by: Auckland GE-Free Coalition (AGEFC)**

**Contact:**

**Jon Carapiet, spokesman**

3/11 Patterson Street, Auckland 1041

**021 050 76781**

**Email: [youcangetmeonline@yahoo.com](mailto:youcangetmeonline@yahoo.com)**

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

The KDC Proposed District Plan as notified does not have provisions regarding Genetically Modified Organisms, which is a serious omission.

While there is huge support for the GMO provisions in the KDC Draft District Plan (submissions lodged previously) it has been removed, and must be restored in the public interest.

The proposed extreme deregulation of outdoor GE/GMO in the controversial Gene Technology Bill (which contains various impractical, and undemocratic proposals, and includes transferring commercial risk to the public) means it is all the more critical that KDC continues its collaborative and fiscally responsible work with the other councils of Northland and Auckland.

We are aware that KDC was a formative member of the Northland/ Auckland INTER COUNCIL WORKING PARTY ON GMO RISK EVALUATION AND MANAGEMENT OPTIONS, who successfully worked together to create a much needed additional tier of local protection against the risks of outdoor GE/GMOs\*.

Given the proposed changes allowing unregulated SDN1 and SDN2 organisms (contained in the controversial Gene Technology Bill, which attracted over 15,000 submissions) the exposure of ratepayers and the environment has a new scale of risk from which the community and Kaipara's biosecurity must be protected.

KDC may want to ask for a copy of the report requested from Auckland Council officials by the Hauraki Gulf Forum which will assess the implications of these unregulated organisms. The Parliamentary Commissioner for the Environment has called for the introduction of Civil Liability to protect the public because the Bill proposes removing the precautionary approach as well as removing ethical considerations regarding outdoor GE/GMOs.

There needs to be the same activity status of discretionary and prohibitive GE/GMO provisions, policies, and rules as originally proposed by KDC in the Kaipara Draft District Plan (Exposure draft September 2022) included in the KDC Proposed District Plan (and the final District Plan).

This would be in alignment with what Whangarei District Council and Far North District Council have already achieved in their operative District Plans (and the direction given by Northland Regional Council in the operative Northland RPS and Northland Regional Plan).

Outdoor GE/GMOs do not respect boundaries- GE contamination spreads through the vectors of pollen, seeds, wind, soils, waterways, machinery, animals, insects, extreme weather events and human error. Farmers /landowners and their valuable enterprises need protection from GE/GMO contamination.

Councils including KDC need to act in the interests of democracy and in keeping with existing legislation, case law to manage natural and physical resources in a sustainable manner, and the direction provided by the operative Northland RPS and Northland Regional Plan.

It is necessary for KDC to protect its biosecurity, wider environment, existing GM free farmers/ primary producers, the economy, and valuable "Northland, naturally" brand.

KDC should ensure that the Proposed District Plan has precautionary and prohibitive GE/ GMO provisions, policies and rules (the same wording as what was in the KDC draft District Plan). We note that Kaipara District's boundary includes the boundary with Auckland region- and the operative Auckland Unitary Plan has precautionary and prohibitive GE/GMO provisions, policies, and rules for both land use and the Coastal Marine Area (CMA).

This is in order to protect the District (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 necessary for Council to reflect the concerns of the Kaipara community (farmers, Iwi/hapu and other ratepayers) about outdoor GM/GE experiments, field trials and releases and act in keeping with the work and findings of the Northland/ Auckland ICWP on GMOs (of which KDC was a formative member).

It is critically important that Kaipara and the wider region be protected from those who might wish to undertake outdoor GE/GMO experiments in the District/Region, without accepting full liability for unintended/ unforeseen adverse impacts of 'exempted from regulation' and EPA approved outdoor GE experiments/ field trials.

Even NZ Crown Research Institutes (CRIs) have a poor track record with outdoor GE experiments, including HortResearch's inadequately contained GE tamarillo trial at Kerikeri. (This was shut down after Northlanders provided Evidence to the Royal Commission into Genetic Modification 2000).

## **Relief sought:**

- 1. Include precautionary and prohibitive GE/GMO provisions in the Kaipara District plan consistent with the wording contained in the KDC draft District Plan (September 2022 exposure draft), the findings of the Northland/ Auckland Inter Council Working Party on GMOs, and the Northland Regional Policy Statement (RPS) direction on Genetically Modified Organisms (GMOs).**
- 2. Given the direction in the Northland RPS, concerns of tangata whenua, existing case law, and consistency with adjoining district plans it is 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).**
- 3. KDC actively engage with the other Councils (NRC and FNDC) who have made submissions opposing the Gene Technology Bill and all the members of the Northland/ Auckland ICWP on GMOs to identify common concerns and cost-effective collaboration to protect our valuable GM Free Food Producer Region (south Auckland- Cape Reinga/ Far North). This includes maintaining oversight of the risks of unregulated SDN1 and SDN2 organisms to the local environment being prepared for the Hauraki Gulf Forum in Auckland Region.**

Please stand with the community and with other councils of Northland and Auckland and ensure robust precautionary and prohibitive GE/GMO provisions, policies, and rules in the KDC Proposed District Plan.

Thank you. Please keep us informed including any hearing which takes place.

**\*See Whangarei District Council's GENETIC ENGINEERING REVIEW webpage on the Northland/Auckland ICWP on GMO's**

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

"Three major reports commissioned by the working party have identified a range of risks involved with the trialling and release of GMOs. They also include approaches to managing those risks.

GMO Reports [link to documents]

## **Environmental risks**

- GMOs becoming invasive and affecting other species including native flora and fauna
- the development of herbicide or pesticide resistance creating 'super-weeds' or 'super-pests'
- long term effects on ecosystem functioning.

## Socio-cultural risks

- effects on Maori cultural beliefs of whakapapa, mauri, tikanga
- ethical concerns about mixing genes from different species including human genes
- concerns about the long term safety of genetically engineered food.

## Economic risks

- loss of income through contamination (or perceived contamination) of non-GMO food products
- negative effects on marketing and branding opportunities such as 'clean and green' or 'naturally Northland'
- costs associated with environmental damage such as clean-up costs for invasive weeds or pests.

Associated with these risks are limited liability provisions under the Hazardous Substances and New Organisms (HSNO) Act 1996. "