

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 (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

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

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) 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>		(3) 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 Kaipara District Council:

From Lisa Er

1 Inaka Place

Titirangi

Auckland 0604

Ph 021777473

To the Kaipara District Council,

I strongly urge the Council to maintain and strengthen the precautionary principle within its policies regarding genetic engineering (GE). This approach is essential for protecting Kaipara's environment, economy, and community well-being in the face of scientific uncertainty and potentially irreversible risks.

Why the Precautionary Principle is Essential

1. Protection of Public Health, Environment, and Economic Interests

The precautionary principle is internationally recognized as a best-practice approach for managing technologies with uncertain but potentially significant risks, such as genetic engineering. It prioritizes health and environmental safety, requiring clear evidence of absence of risk before allowing new technologies, rather than assuming safety in the absence of evidence.

Kaipara's valuable agricultural, horticultural, apiculture, fisheries, and forestry sectors—and the region's "Northland, naturally" brand—could be jeopardized by the outdoor use of GMOs. Market access and premiums for local products depend on maintaining a GE-free status, as demonstrated by celebrated food regions like Tuscany and Bordeaux, which have official GM-free zones.

2. Scientific Uncertainty and Irreversibility

Genetic engineering, especially new techniques like gene editing, carry unpredictable and imprecise outcomes, including unintended effects on ecosystems and biodiversity.

The long-term impacts of GE organisms, once released, are often unknown and may be irreversible, making a precautionary approach the only responsible course of action.

3. Community and Regional Alignment

There is strong community and industry support for precautionary and prohibitive GE/GMO provisions in Kaipara, with three-quarters of recent submitters backing such measures.

Aligning Kaipara's policies with those of neighbouring councils (Whangārei, Far North, Auckland) ensures a unified regional approach, strengthens biosecurity, and avoids creating regulatory gaps that could be exploited.

4. Deficiencies in National Legislation

The current national framework (HSNO Act) has significant gaps, including inadequate liability provisions and no mandatory requirement for the Environmental Protection Authority (EPA) to take a precautionary approach to outdoor GE/GMO applications.

Local government action is therefore necessary to fill these gaps and protect the interests of Kaipara's residents, environment, and economy.

What the Precautionary Principle Means for Kaipara

It means not permitting outdoor GE/GMO experiments, trials, or releases unless there is robust scientific evidence demonstrating safety and the ability to manage or reverse any adverse effects.

It supports open decision-making, consideration of long-term goals, and the exploration of safer alternatives before adopting risky new technologies.

It ensures consistency with regional policy statements and plans, which already emphasize precaution towards GE/GMO risks.

Conclusion and Recommendations

Kaipara District Council has a responsibility to act in the best interests of its people, environment, and economy. By embedding the precautionary principle in the District Plan and aligning with other regional councils, KDC will:

Safeguard local industries and market access.

Protect biodiversity and the environment for future generations.

Respond to strong community and industry support.

Compensate for deficiencies in national regulation.

Ensure a truly **democratic** approach to local legislation is enacted.

I urge the Council to retain and strengthen precautionary and prohibitive provisions on GE/GMOs in the District Plan, ensuring Kaipara remains a leader in sustainable, safe, and forward-thinking governance.

Nb – Apologies - I was unable to sign the submission form. I am not technical enough. However I could post you the signed form if necessary – but obviously not by 5pm today.