

## 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

**Monday 30<sup>th</sup> June, 2025**

Kaipara District Council  
32 Hokianga Road,  
Dargaville,  
0340

**RE: Submission on the Kaipara District Council proposed district plan**

Submitted by	Te Rūnanga-Ā-Iwi-Ō Ngāpuhi
Contact person:	Moana Tuwhare – Tumu Whakarae (General Manager)
Email:	board.admin@ngapuhi.org.nz
Contact no:	027 351 8915

Tēnā koutou,

**Introduction**

Te Rūnanga-Ā-Iwi-Ō Ngāpuhi (TRAION) is the mandated iwi authority for Ngāpuhi. Established in 1989, TRAION represents the collective interests of Ngāpuhi in matters relating to the Crown, local and central government, and other external agencies. As the mandated iwi organisation under the Māori Fisheries Act 2004, TRAION also holds responsibility for managing and distributing iwi settlement assets. TRAION operates in support of Ngāpuhi whānau, hapū, and marae through a range of kaupapa – including health, education, social services, and cultural revitalisation – and remain committed to advocating for the tino rangatiratanga of our people. This submission is made in that spirit, with a view of protecting and advancing the wellbeing of Ngāpuhi.

We are writing in strong opposition to the omission of the precautionary and prohibitive provisions relating to genetically engineered (GE) and genetically modified organisms (GMOs) from Kaipara District Councils (KDC) proposed district plan. As tangata whenua of Te Tai Tokerau, our obligations to uphold kaitiakitanga compel us to speak clearly against the unacceptable risks posed by outdoor GE/GMO activities.

**Recommendations**

TRAION requests that KDC:

1. Reinstate the precautionary and prohibitive GE/GMO provisions, policies, and rules that were previously included in the KDC Draft District Plan (September 2022 Exposure Draft);
2. Align the KDC Proposed District Plan with:
  - a. The direction of the Northland Regional Policy Statement (Northland Regional Council)
  - b. The operative district plans of Whangārei, Far North, and Auckland Councils
  - c. The findings of the Northland/Auckland Inter-Council Working Party on GMO risk evaluation and management options (ICWP).



3. Adopt the same wording and provisions used by other councils across Te Tai Tokerau to ensure consistency, regional integrity, and legal defensibility.
4. Include local protections against the risks of outdoor GE/GMO activities, including provisions for strict liability, mandatory bonds, and local authority control.
5. Support and respect the existing iwi and hapū positions across the rohe that call for a prohibition on GE/GMO use in their respective rohe.

### **Ngā Toki Whakarururanga**

TRAION support the work carried out by Ngā Toki Whakarururanga especially as it relates to Hua Parakore and Rongoā Māori and the resistance to GE/GMOs. Te Waka Kaiora (the Māori organics network) in their report of evidence to the Waitangi Tribunal Inquiry into the WAI262 claims shows:

- GM and GMOs pose threats to indigenous flora and fauna and thus to food systems, te taiao, tikanga Māori and ourselves more broadly.
- The movement of genes within an organism and across species impacts on the mauri, wairua and whakapapa of that organisms, and its wider surroundings, and is a violation of tapu.
- The role of kaitiaki is to protect and maintain the mauri of our flora and fauna whanaunga for future generations, including at the molecular level.
- Māori women hold key roles in the protection of whakapapa, mauri, ira, tapu and as kaitiaki.
- Past, current and future generations have the right to tino rangatiratanga and the tampering of genetic material is in direct conflict with that right.

**Concluding comments**

TRAION strongly opposes the lack of precautionary and prohibitive GE/GMO provisions, policies and rules in the Kaipara District Plan. These technologies pose unacceptable risks to te taiao, undermine whakapapa and tikanga, and conflict with our obligations as kaitiaki.

We support work being done by Ngā Toki Whakarururanga, Te Waka Kaiora, and GE Free Northland in advancing Hua Parakore, Rongoā Māori and protecting the integrity of Māori food and healing systems. The evidence is clear: GE/GMOs compromise mauri, breach tapu, and threaten tino rangatiratanga.

KDC must uphold regional consistency, honour hapū and iwi positions, and reinstate strong prohibitive provisions. This is about protecting our people, our environment, and our future.

**We wish to present our submission during the relevant hearing process.**

Ngā manaakitanga,

Moana Tuwhare  
Tumu Whakarae / General Manager