

**Further Submission Form**  
 In support of, or in opposition to,  
 submission/s on notified:

ECM Project: DPRPh5-04
ECM # .....
FS # .....
Customer # .....
Property # .....

**Proposed Waikato District Plan – Stage 1**

*Clause 8 of Schedule 1, Resource Management Act 1991*

**Closing date for further submissions: 9am on Tuesday 16 July 2019**

\*Note this form reflects the re-notification period of Further Submissions to the Proposed Waikato District Plan (Stage 1)

To submit electronically please go to: [www.waikatodistrict.govt.nz/pdp](http://www.waikatodistrict.govt.nz/pdp)

<b>I. Further Submitter details:</b> <i>(mandatory information)</i>	
Full name of individual/organisation making further submission:	BIOTech New Zealand
Contact person <i>(if different from above)</i>	Dr Zahra Champion
Email address for service	Zahra.champion@biotechnz.org.nz
Postal address for service	PO Box 302469 North Harbour Auckland 0751
	Postcode:0751
Preferred method of contact	<input checked="" type="checkbox"/> Email <input type="checkbox"/> Post
Phone numbers	Daytime: 021899732
	Mobile: 021899732
Correspondence to	<input type="checkbox"/> Submitter <input checked="" type="checkbox"/> Contact person <input type="checkbox"/> Both

<b>2. Eligibility to make a further submission</b> <i>(for information on this section go to RMA Schedule 1, clause 8)</i>
I am: <input type="checkbox"/> A person representing a relevant aspect of the public interest; <i>In this case, also specify below the grounds for saying that you come within this category; or</i> <input checked="" type="checkbox"/> A person who has an interest in the proposal greater than the interest that the general public has. <i>In this case, also specify below the grounds for saying that you come within this category; or</i>
My reasons for selecting the category ticked above are: BIOTech New Zealand <a href="https://biotechnz.org.nz/">https://biotechnz.org.nz/</a> is a purpose driven, not for profit, non- governmental organization that is member funded. BIOTecNZ aim is to raise awareness and increase the understanding to enable our nation to embrace the best opportunities biotech offers to us daily, helping us live better, healthier and more productive lives. Our role is to help advance New Zealand’s economic growth by assisting companies developing high value businesses from bioscience.

<b>3. Request to be heard at a hearing</b>
<input checked="" type="checkbox"/> Yes, I wish to be heard at the hearing in support of my further submission; or  <input type="checkbox"/> No, I do not wish to be heard at the hearing in support of my further submission

#### 4. Joint submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Yes  No

#### 5. Checklist for further submission being made

- I have filled in the table on the next page with details of my further submission.
- I have added 20 further pages/sheets that form part of my further submission.
- I understand that I am responsible for serving a copy of my further submission on the original submitter(s) within 5 working days after it is served on Council.

#### 6. Signature of further submitter *(a signature is not required if you make your submission by electronic means)*

Signature of further submitter (or person authorised to sign on their behalf)

Signature: Zahra Champion  
*(type name if submitting electronically)*

Date: 15 July 2019

#### 7. Return this form no later than 9am Tuesday 16 July 2019 by:

- Delivery to any Waikato District Council office or library
- Post to Waikato District Council, Private Bag 544, Ngaruawahia 3742
- Email to [districtplan@waidc.govt.nz](mailto:districtplan@waidc.govt.nz)

#### 8. Important notes to person making a further submission:

##### A. Content of further submission

A further submission must be limited to a matter in support of, or in opposition to, an original submission. A further submission cannot introduce new matters that were not raised in original submissions.

Please note that your further submission (or part of your further submission) may be struck out if the authority is satisfied that at least one of the following applies to the further submission (or part of the further submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the further submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

##### B. Serving a copy of your further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on Council.

##### C. Privacy Information

Council will make all further submissions, including name and contact details, publicly available on Council's website. Personal information will also be used for the administration of the submission process and will be made public.

**Additional pages which form part of the  
BIOTech New Zealand further submission**

Waikato District Plan - GMO Provisions

BIOTech New Zealand supports all information supplied by  
**The Life Sciences Network Inc.** as part of their further submission.



BIOTechNZ **opposes** the requests to insert policies and rules relating to Genetically Modified Organisms for the following reasons:

**a. Council chose not to insert GMO provisions**

- a. That there are no Genetically Modified Organisms (GMO) provisions in the notified Proposed District Plan (PDP).
- b. We understand that GMO provisions were requested at pre plan consultations but that the council chose not to put such provisions in to the PDP.
- c. Because GMO provisions have been requested in primary submissions there is no relevant section 32 report.
- d. Submitters will not have the opportunity to submit on any provisions the council may subsequent decide to put in.
- e. Many potential submitters will be unaware that the issue of genetic modification is now before the decision makers for consideration.

Thus, should the council change its mind on the need for GMO provisions in the District Plan, a separate plan change should be undertaken at a future time. A plan change to insert GMO Provisions could be sponsored by the proponents or by the Council itself.

**b. New Zealand is not GMO free**

- a. Between 2014 and 2018 genetically modified petunias were in sold without approval in New Zealand. MPI issued a recall when they realized certain varieties were likely to be genetically modified but do not appear to have undertaken any testing or surveillance work to understand the dispersal of this organism stating that it is neither a threat to health nor the environment. Nor to our knowledge have they (or any council with GMO prohibitions) undertaken any eradication perhaps reflecting, and demonstrating, that the regulators were unconcerned about risk and effect, notwithstanding the lack of approval.
- b. There have already been five GMO releases into the environment approved since the passing of the Hazardous Substances and New Organisms Act (Animal vaccines and human therapeutics). These releases have presented no issues.

Release of GMOs for medical use		
<b>APP202371*</b>	30/04/19	To import and release a genetically modified live attenuated vaccine that protects humans against Japanese encephalitis (Imojev) into New Zealand.
<b>APP203530</b>	23/04/18	To import a genetically modified live-attenuated oncolytic vaccinia virus for conditional release in a phase 1b clinical trial as an experimental therapy for renal cell carcinoma
<b>APP202854</b>	12/02/18	To import for release a genetically modified adenovirus (Telomelysin) for use in a Phase II clinical trial for patients with advanced melanoma
<b>APP202601</b>	28/10/15	To import for release a genetically modified live-attenuated vaccinia virus (Pexa-Vec) for use in a Phase 3 clinical trial for patients with hepatocellular carcinoma
Release of GMOs for veterinary use		
<b>GMR07001</b>	19/11/08	To gain approval to import for release genetically modified vaccines (Proteqflu and Proteqflu Te) to protect horses against Equine Influenza
*Released without controls		

### c. New Zealand is facing big global challenges

There is no argument that together with the rest of the world, New Zealand faces unprecedented global challenges. A new report shows the way New Zealanders live and make a living is having a serious impact on our environment. Jointly produced by the Ministry for the Environment and Stats NZ, *Environment Aotearoa 2019* outlines nine priority issues in need of attention. The nine priority issues the reports identifies are:

- Our native plants, animals and ecosystems are under threat.
- Changes to the vegetation on our land are degrading the soil and water.
- Urban growth is reducing versatile land and native biodiversity.
- Our waterways are polluted in farming areas.
- Our environment is polluted in urban areas.
- Taking water changes flows which affects our freshwater ecosystems.
- The way we fish is affecting the health of our ocean environment.
- New Zealand has high greenhouse gas emissions per person.
- Climate change is already affecting Aotearoa New Zealand.

There is a growing urgency to discuss how new technologies can play a crucial role in part of the solutions in these global challenges and it would be detrimental for New Zealand if policy restrictions slow or halt these discussions.

### d. Technology is rapidly changing

Biotechnology (commonly abbreviated as biotech) is the use of biological systems found in organisms or the use of the living organisms themselves to make technological advances and adapt those technologies to various different fields. These include applications in various fields from agricultural practice to the medical sector.

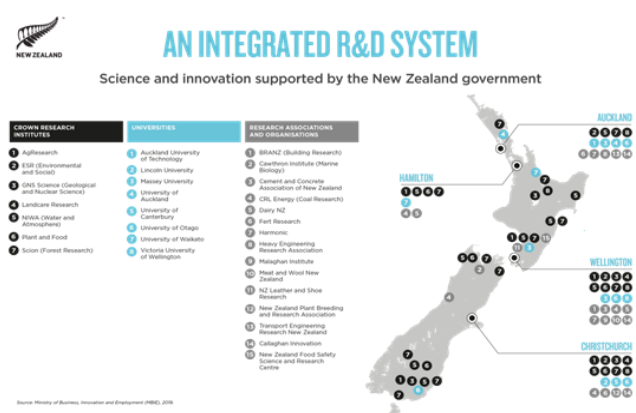
Genetic technology is rapidly changing,

- a. The traditional methods of genetic modification involve the insertion of whole genes into an organism more recent techniques (often termed “gene editing”), allow changes to be made in a far more precise way.
- b. Gene editing technologies are now capable of making changes which are indistinguishable from traditional (non-regulated) breeding techniques.

Countries such as Australia, USA, Brazil, Japan, Sweden, no longer regulate some aspects of genetic modification.

### e. New Zealand is underpinned by science and technology

New Zealand’s bioeconomy is underpinned by a long tradition of applying research to wide ranging issues in human and animal health, food, agritech and energy. We have a growing number of high-tech companies whose core business is biotechnology, and this is increasing yearly. In 2016 New Zealand was ranked 4th out of 54 countries in the Scientific American World View Scorecard for Innovation Potential in Biotechnology<sup>1</sup>. This is driven by a great climate for doing business, world-class researchers, scientific excellence and a flexible workforce.



<sup>1</sup> Scientific American Worldview 2016  
BIOTech New Zealand

Significant levels of high-quality biotechnology research is conducted by the higher education sector in all of New Zealand's eight major universities (two of which are among the world's top 100 life science universities), Centres of Research Excellence and niche research institutes, including the Liggins Institute and the Malaghan Institute of Medical Research. Research institutes include New Zealand's government-funded Crown Research Institutes, including AgResearch, ESR, GNS, Landcare Research, NIWA, Plant and Food Research and Scion where each specializes in a field of research such as environmental, forestry, pastoral research or industrial research.

- AgResearch -Animal breeding- New Zealand scientists are breeding sheep to fart and burp less Scientists at Invermay Agricultural Centre in Mosgiel, about 360km south-west of Christchurch, have bred climate-friendly sheep that produce 10 per cent less methane than their gassy counterparts. <https://www.abc.net.au/news/rural/2018-06-07/new-zealand-scientists-breed-sheep-that-fart-and-burp-less/9841546>. Genetically modified cows could cut methane emissions by 50% <https://nypost.com/2019/07/05/genetically-modified-cows-could-cut-methane-emissions-by-50-percent/>
- Plant breeding, A new strain of ryegrass developed in NZ promises to reduce water demands and curb emissions. <https://thespinoff.co.nz/science/19-07-2018/super-grass-is-here-and-its-a-green-breakthrough-can-the-greens-stomach-it/>
- New Zealand company Lanzatech recycling carbon from industrial off-gases; reduce emissions and economy. Lanzatech shifted its operations from Auckland to Illinois was a commercial necessity, reflecting the relative cost of doing business, proximity to projects of scale, the difficulty of attracting key technical staff to New Zealand and the country's regulatory barriers to using genetically modified organisms – a key element in Lanzatech's bio-fuel production.

#### **f. Future proofing New Zealand**

*"In this year's conversations, industry leaders talked about the opportunities inherent in emerging biotechnologies; as well as the potential future impact of choosing not to use these technologies. Some contributors believed that unless we are open to using existing and emerging technologies, New Zealand cannot be:*

- *a low carbon leader,*
- *a sustainable food producer,*
- *and a contributor to feeding the world.*

*The ability to grow plants has always been our competitive advantage, however technology is transforming how plants are grown; and we stand to lose both expertise in plant science and our competitive advantage if we are not open to this discussion*

*The world continuously moves forward on biotechnology, but New Zealand's capability remains stalled. Investing in research in these areas ensures we have the capability if and when a decision is made to permit their use.*

*The message from industry leaders was clear: now is the time for a comprehensive conversation on this issue."*<sup>2</sup>.

## Specific Issues Raised by Submitters

Many submitters made the same or similar requests and raised the same or similar issues. To avoid unnecessary duplication the table below has grouped the issues raised by submitters and provided a response. These responses apply to each relevant submission. In addition, all of the general comments above apply to each of the specific submissions referred to below. The following tables should be read to include these general comments as they apply to each submission. Support or opposition to each submitter request is contained in the final table.

Issue Raised by Submitter(s)	Biotechnology Community Response
Harm our clean green image	<ul style="list-style-type: none"> <li>• This is not supported by cogent evidence.</li> <li>• Australia uses genetic modification in its agricultural systems yet its meat sells at a premium to New Zealand meat product.</li> <li>• Tasmania has declared itself GMO free yet its product (e.g. canola) does not command a premium over GM free product from mainland Australia.</li> <li>• Gene editing techniques have the potential to drive down our biological greenhouse gas emissions (e.g. AgResearch grass being trialled in the USA) and as a tool in our battle to save our birds (Predator Free 2050). Our clean green image would likely be harmed if we did not use these technologies should they be available and of benefit.</li> <li>• New Zealand’s green future would benefit from planting more high value plants, many of which will be gene-edited</li> <li>• Economic effects, at both a local and national scale, must be considered by the EPA on a case by case basis.</li> <li>• The so-called ‘Corngate’ controversy where GM corn was discovered in the Hawke’s Bay environment in 2002 had no impact on our sales of food products.</li> </ul>
Lack of demand for GM products/Markets do not want GM products	<ul style="list-style-type: none"> <li>• GM products are wanted by people when they perceive a benefit – for example cancer treatments such as Keytruda which have been the subject of protests demanding access in New Zealand. Insulin used by diabetics is also genetically modified.</li> <li>• The Impossible Burger, which is GMO food, sells at a premium over conventional meat.</li> <li>• The “non-GM Project” commands less than 1% of the US food industry.</li> <li>• If there were no market for GM products (farmers or consumers) then these products would quickly disappear.</li> </ul>
GM use in New Zealand could potentially bring an end to conventional agriculture	<ul style="list-style-type: none"> <li>• This is not supported by the evidence.</li> <li>• Co-existence between organic, conventional and GM farming systems exists where GM technologies are allowed (e.g. USA which has thriving organic and GM agriculture)</li> <li>• Co-existence is best practice – an organic sector maximises its benefits from a point-of-difference only if the alternative is available</li> <li>• New Zealand imports GM free seed from the USA where over 90% of corn is genetically modified. If coexistence did not work this would not be possible.</li> </ul>
Scientific uncertainty and	<ul style="list-style-type: none"> <li>• The EPA is responsible for considering scientific uncertainty.</li> </ul>

Issue Raised by Submitter(s)	Biotechnology Community Response
precaution/ Insufficient research/Regulations not robust	<ul style="list-style-type: none"> <li>• The Royal Commission on Genetic Modification considered that “the basic regulatory framework is appropriate and that the key institutions, the [EPA] and the Australia New Zealand Food Authority (ANZFA), carry out their functions conscientiously and soundly. “</li> <li>• The EPA must also exercise a precautionary approach.</li> <li>• Decisions are more cautious where there is more uncertainty.</li> <li>• Zero risk and absolute certainty is an unrealistic requirement for any regulatory decision including decisions the WDC makes every day.</li> </ul>
The risks are too great/health and environmental effects/there should be no risk	<ul style="list-style-type: none"> <li>• Genetic modification has been used in agriculture and food production for more than two decades without any scientifically credible incident of harm attributable to the GM nature of its use.</li> <li>• The development and use of GM is assessed by the EPA on a case by case basis.</li> <li>• The EPA must take a precautionary approach to its decision making so if the “risks are too great” the EPA would not approve the development or use of that GMO.</li> <li>• Precision breeding using new GM techniques, such as gene editing, is more precise and more predictable than traditional breeding such as mutagenesis.</li> <li>• It is unrealistic to eliminate all risk even using conventional breeding.</li> </ul>
Maori approach to GM/Adverse effects on tangata whenua/cultural value	<ul style="list-style-type: none"> <li>• Agree with Tainui Environment Plan (clause 15.2.13) and Maniapoto environment plan (policy 25.3.4) which treats new organisms and GMOs the same.</li> <li>• While both these plans demand precaution and consideration neither stipulate this has to be done through the RMA.</li> <li>• Consideration through the EPA under HSNO without specific rules for GMOs under the RMA is consistent with the policies on GMOs and new organisms in these plans.</li> <li>• The EPA considers effects and risks including cultural values.</li> </ul>
Liability and bonds	<ul style="list-style-type: none"> <li>• The Royal Commission on GM reported that “from a legal liability perspective we have not been persuaded there is anything so radically different in genetic modification as to require new or special remedies.”</li> <li>• They also said that strict liability and bonds were a barrier to innovation and progress and could effectively prohibit an activity.</li> <li>• The EPA already have the power to impose bonds.</li> <li>• Strict liability already exists for GMO developers who breach their conditions.</li> </ul>
Loss of markets and premiums/livelihood Reputational Damage	<ul style="list-style-type: none"> <li>• These issues are considered by the EPA</li> <li>• Reputation is the result of many factors including our ability to address environmental issues such as water quality and climate change. Officials have advised the Government that our unnecessarily and overly strict regulations are an impediment to using genetic technologies to address these issues.</li> </ul>
Cross contamination of crops	<ul style="list-style-type: none"> <li>• It is an unrealistic demand to require zero risk of any cross pollination between sexually compatible crops.</li> <li>• Countries, markets and certifiers (e.g. organic and non-GMO certifiers) have a tolerance policy which allows coexistence.</li> </ul>

Issue Raised by Submitter(s)	Biotechnology Community Response
Loss of organic/GE Free status	<ul style="list-style-type: none"> <li>Regimes to provide realistic and reasonable protection should be made on a case by case basis. This would be done by the EPA (under a conditional release), the industry or, if required, the council through the Biosecurity Act (pest management strategies as is the case for wild kiwifruit, wilding pines, feral goats, feral pigs and feral deer).</li> <li>Seed purity is currently managed by the industry.</li> </ul>
Tatua, Fonterra and Miraka Milks have a GMO-free requirement for milk products.	<ul style="list-style-type: none"> <li>This is a commercial decision for these companies therefore regulation under the RMA is not required.</li> <li>Dual supply systems are already used by dairy companies, such as conventional and organic.</li> <li>Non-GMO certification has a tolerance (up to 5% GM feed) so this allows for GM and non GM dairy systems to exist together in New Zealand.</li> <li>Industry needs will be considered by EPA on a case by case basis.</li> <li>GMO rennet is used in New Zealand cheese production</li> </ul>
Value of research	<ul style="list-style-type: none"> <li>In asking for AgResearch to exempt from prohibitive rules some submitters (e.g. GEFreeNZ) recognise the value of research for employment and improved understanding of GM science.</li> <li>It is inconsistent to then ask for others to work under a different set of rules.</li> <li>Prohibiting research will reduce the employment and economic opportunities provided by research organisations such as AgResearch.</li> </ul>
Irreversible Impacts of GMOs/eradication is impossible	<ul style="list-style-type: none"> <li>The same issues apply to new organisms.</li> <li>Irreversibility must be considered by the EPA prior to any decision to use or release a GMO just as it is for the release of a new organism (e.g. Dung Beetle release).</li> <li>GM Petunias have been sold in stores since 2014. MPI issued a recall in 2017. If irreversibility of GMOs were universal then GMO petunias would be still growing in the New Zealand/Waikato environment further voiding any claim to GM freedom.</li> <li>In reality the ability to eradicate an unwanted GM (or new) organism will depend on the nature of the organism and the modifications made to it. Such consideration would be made by the EPA on a case by case basis before a decision would be made to release (or not release).</li> </ul>
Claims of benefits unsubstantiated	<ul style="list-style-type: none"> <li>This would be considered by the EPA</li> <li>In countries where GM crops are available farmer uptake has been substantial (over 90% in many cases) suggesting that farmers see considerable benefit from using GM technology.</li> </ul>
Provisions exist under the RMA to regulate GMOs/ GMOs are best managed through the RMA	<ul style="list-style-type: none"> <li>The legal jurisdiction of the RMA to control organisms which are GMOs is not in dispute.</li> <li>The council is not obligated to put in place provisions related to GMOs.</li> <li>Justification for putting in place rules (e.g. scientifically credible section 32 analysis) has not been provided and has not been tested in any other RMA process.</li> <li>The EPA has the scientific and technical capability to assess the use of GMOs.</li> <li>The EPA assesses the risks and benefits of GMO use on a case by case basis.</li> </ul>



Issue Raised by Submitter(s)	Biotechnology Community Response
	<ul style="list-style-type: none"> <li>• Conditional release allows the EPA to put in place requirements to manage any risk.</li> <li>• In the unlikely case that there are residual risks requiring management which have not been managed through the EPA hearing and decision making process the WDC would have the opportunity to put in place rules under the Biosecurity Act (Pest Management Strategy) or the RMA.</li> </ul>
Prohibition	<ul style="list-style-type: none"> <li>• The Royal Commission on Genetic Modification said we should proceed with caution while preserving our opportunities</li> <li>• “Strong precautionary” and “prohibitive” policies (a prohibitive approach) would: <ul style="list-style-type: none"> <li>○ Reduce the opportunity to understand the environmental, social, cultural and economic opportunities for GM in New Zealand</li> <li>○ Reduce human capability as scientists move to other countries</li> <li>○ Means New Zealand would forego opportunities which may benefit the environment (e.g. mitigate wilding pines, reduce greenhouse gas emissions in agriculture, meet our ambition for predator free 2050) or animal welfare (e.g. hornless cattle).</li> <li>○ Erode the Waikato as a region in which science can flourish.</li> </ul> </li> </ul>
Ruakura animal field test site should be the only area zoned for Genetically Modified Organism (GMO) activity	<ul style="list-style-type: none"> <li>• GE Free NZ identifies Ruakura (AgResearch) as a “strategically important research and industrial site”</li> <li>• We agree with this assessment but it undermines the prohibitive rules requested by the submitter</li> <li>• AgResearch have been operating field trials without the requirement for GMO rules under the RMA which is inconsistent with the assertions of unacceptable risk by submitters.</li> </ul>
New Zealand would lose its GM free status/ New Zealand is GE Free in food production and/or the environment Waikato District is GM Free	<ul style="list-style-type: none"> <li>• New Zealand is not GM free now.</li> <li>• There have been five approvals for release of a GMO since the HSNO Act was enacted in 1996. Four human vaccines/therapeutics and one animal vaccine. <ul style="list-style-type: none"> <li>○ The latest approval was the first release of a GMO into the New Zealand environment without controls (full release).</li> </ul> </li> <li>• While there have been no GM crops or animals approved for release in New Zealand, GM is used/is legal in New Zealand’s food production systems: <ul style="list-style-type: none"> <li>○ Genetically modified enzymes are used in cheese production</li> <li>○ GM animal feed is imported and used in the meat, poultry and dairy industries.</li> </ul> </li> </ul>
Genetically Modified animal sites should be registered on the Land Information Memorandum (LIM) reports	<ul style="list-style-type: none"> <li>• LIM reports nor what should be in them are not specified in the Waikato PDP.</li> <li>• The submitter has not provided any evidence that sites which have had GM animals contain any hazardous material</li> </ul>
Consistent approach	While the implementation of GMO provisions may provide some consistency with the Auckland region it will make them inconsistent

Issue Raised by Submitter(s)	Biotechnology Community Response
across Northland, Auckland the Waikato and to eliminate cross boundary issues	with the other districts the Waikato District borders. Decisionmakers in those other processes did not have access to the full information necessary to make a balanced decision
Conditions of consent may be breached by poor management, human error, natural events and sabotage of projects.	There is strict liability under HSNO for breaching conditions of consent. These risks are assessed by the EPA

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
695	Sharp Planning Solutions Ltd	Support submission point 695.56	Retain the definition for "Agricultural and horticultural research activities" in Chapter 13 Definitions which no longer contains references to "Genetic Engineering".	Genetic engineering is best managed by the Environmental Protection Authority on a case by case basis.	Allow this whole submission point.
245	Aaron Mooar	Oppose submission point 245.3	Add a resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and social well-being considerations.	The LSN opposes this submission point for the reasons set out in the attached pages which include: <ul style="list-style-type: none"> <li>• GMOs are out of scope.</li> <li>• Claims of harm are not scientifically credible.</li> <li>• The issues raised in the submission are already considered (using a precautionary approach) by the Environmental Protection Authority. After that, any residual issues can be managed using provisions in the Biosecurity Act (Pest Management Strategies)</li> <li>• Another unnecessary level of regulation as proposed will undermine Waikato's position as a leader in agricultural science, will erode scientific capability, reduce economic opportunities and will limit access to new technologies to address climate change, predator control, water quality and competitiveness.</li> </ul>	Disallow this whole submission point.
245	Aaron Mooar	Oppose submission point 245.4	Add strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
286	Waikato-Tainui	Oppose submission point 286.37	Add clear provisions for genetically modified organisms that include: precautionary policies to regulate the outdoor use of genetically modified organisms; prohibit the release of genetically modified organisms on land; and make field trials a discretionary activity with performance standards in regard to liability and the posting of bonds.	My reasons for opposing this submission point are set out under point 245.3 above, and is not consistent with Tainui Environmental Plan.	Disallow this whole submission point.
353	Michael Anderson	Oppose submission point 353.1	Add strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms (GMOs), the same or similar to the Far North District Plan, Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
380	Waahi Whaanui Trust		Add clear provisions to include precautionary policies to	My reasons for opposing this submission point	Disallow this whole

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
		submission point 380.7	regulate the outdoor use of genetically modified organisms AND Add provisions to prohibit the release of GMOs on land and make field trials a discretionary activity with performance standards in regard to liability and the posting of bonds.	are set out under point 245.3 above.	submission point.
480	Susan Carter	submission point 480.1	Add a resource management framework for the management of genetically modified organisms (GMOs) that is region-specific, taking into account environmental, economic and social wellbeing considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
480	Susan Carter	Oppose submission point 480.4	Add strong precautionary and prohibitive provisions, policies and rules for Genetically Modified Organisms that are the same (or similar) to those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
499	Adrian Morton	Oppose submission point 499.19	Add a resource management framework for the management of Genetically Modified Organisms that is regional specific taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
525	Gillian Marie	Oppose submission point 525.1	Add a resource management framework for the management of GMOs that is regional specific taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
525	Gillian Marie	Oppose submission point 525.2	Add strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms that are the same (or similar) as those in the Far North District Plan, Whangarei District Plan and the Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
525	Gillian Marie	Oppose submission point 525.3	Amend the Proposed District Plan to required all consent applications to be automatically publicly notified, regardless of whether the application is regarding genetically modified organisms or not.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
546	Lynne Adrienne	Oppose submission point 546.1	Add strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
553	Malibu Hamilton	Oppose submission point 553.1	Add strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms. The same or similar to those in the Far North District Plan, Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
599	Martin Hastings	Oppose submission point 599.1	Add strong precautionary and prohibitive provisions, rules and policies relating to the management of Genetically Modified Organisms, made similar or the same as those in the Far North District Plan, the Whangarei District Plan, and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
599	Martin Hastings	Oppose submission point 599.2	Add a resource management framework for the management of Genetically Modified Organisms that is regionally specific, taking into account environmental, economic, and social well-being	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
			considerations		
638	Nora van der Voorden	Oppose submission point 638.1	Amend the Proposed Waikato District Plan to include a resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and social well-being considerations	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
638	Nora van der Voorden	Oppose submission point 638.2	Amend the Proposed District Plan to include strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
651	GE Free New Zealand	Oppose submission point 651.1	<p>Add new provisions to the Proposed District Plan to give Genetically Modified Organisms their own section, as follows (which replicate those provisions in the Auckland Unitary Plan):</p> <p><u>Issue: Genetically Modified Organisms</u>  <u>The environment, including human health and well-being, is safe from the adverse effects of GMO's from land use activities.</u></p> <p><u>Resource Consent Categories</u></p> <ul style="list-style-type: none"> <li>• <u>Field Trials -Discretionary Activity</u></li> <li>• <u>Food-related GMO Releases - Prohibited Activity</u></li> <li>• <u>Non-food-related GMO Releases - Prohibited Activity</u></li> </ul> <p><u>Policies</u></p> <ol style="list-style-type: none"> <li>1. <u>Adopt a precautionary approach by prohibiting the general release of a GMO</u></li> <li>2. <u>Require outdoor field trialling of GMOs to be a discretionary activity to avoid the risk effects to the environment from the use, storage, cultivation, harvesting, processing or transportation.</u></li> <li>3. <u>Adopt an adaptive approach through periodic reviews of these plan provisions, particularly if new information on the benefits and/or adverse effects of a GMO activity becomes available.</u></li> <li>4. <u>Require the holder of a resource consent granted for the outdoor field trialling of a GMO is financially accountable for any adverse effects associated with the activity.</u></li> <li>5. <u>Enable the use of GMOs approved releases for medical and veterinary applications, except for the outdoor cultivation of pharmaceutical producing organisms.</u></li> <li>6. <u>Require where appropriate, more stringent measures than those required under the provisions of the HSNO Act to manage potential risks.</u></li> </ol>	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
			<p>7. <u>Require all monitoring costs to be met by the consent holder.</u>  <u>Reasons and Explanations The objectives, policies and methods seek to achieve the following:</u></p> <ol style="list-style-type: none"> <li>1. <u>Manage risk and avoid adverse effects on people, communities, tangata whenua, the economy and the environment associated with the outdoor use of GMOs.</u></li> <li>2. <u>Provide the framework for a unified approach to the management of the outdoor use of GMOs to address cross-boundary effects.</u></li> <li>3. <u>Ensure accountability by GMO operators for the full costs related to the monitoring of GMO activities, and any migration of GMOs beyond specified areas, including unintentional GM contamination.</u></li> <li>4. <u>Ensure accountability by GMO operators for compensation via performance bonds in the event that the activity under their operation results in adverse effects to third parties or the environment.</u></li> <li>5. <u>The manufacture, trialling or use of viable and/or non viable genetically modified organisms for medical purposes recognised as medicines under the Medicines Act 1981 and approved as safe to use by the Ministry of Health, including the EPA approved releases except for the outdoor cultivation of pharmaceutical producing organisms.</u></li> </ol>		
651	GE Free New Zealand	submission point 651.2	No specific decision sought, but submission states that the AgResearch Ruakura animal field test site should be the only area zoned for Genetically Modified Organism (GMO) activity	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
651	GE Free New Zealand	submission point 651.4	No specific decision sought, but submission supports Rural Resources - 1A.6 Issues, Objectives and Policies in the Operative District Plan which ensure that rural actions do not constrain or compromise existing lawfully-established productive rural activities.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
707	Soil & Health Association of New Zealand (S&H)	submission point 707.1	<p>Add a new provision, 1.5.7.X Genetically modified organisms (GMO), as follows:  <u>1.5.1.7.X Genetically Modified Organisms (GMO)</u>  (a) <u>The Hazardous Substances and New Organism Act 1996 (HSNO) requires that before any GMO can be imported into the country, developed in containment, tested in the field or released into the environment, approval must be obtained from the Environmental Protection Authority (EPA).</u>  (b) <u>The RMA provides the scope for District Plans to place additional controls on the use of GMOs, if that control can</u></p>	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
			<p><u>be justified under section 32 of the RMA. It is considered that the prohibited status for the release of all GMO land use activities and strict controls on the field trialling of GMO land use activities is necessary to reflect social and cultural expectations that Waikato will be protected from accidental contamination of the environment by GMOs. Providing for the wellbeing of the community by giving certainty through the use of a prohibited activity status and strict discretionary controls, including the use of bonds, is therefore appropriate.</u></p> <p>(c) <u>Prohibited status for the release of GMOs and for field trial activities that cannot meet discretionary activity standards means that the Waikato District is taking a precautionary approach to managing the potentially significant, long term and irreversible effects of GMOs. In addition to the environmental risks associated with the release of GMOs, there are economic risks caused by the sensitivity of export markets for high value produce to potential GMO contamination.</u></p> <p>(d) <u>Discretionary activity status has been applied to specific viable GMO activities, namely the use of viable GMOs in veterinary vaccines where permitted standards cannot be met, and in field trials, provided discretionary standards can be met. By applying standards to the outdoor use of GMOs in only a select number of circumstances, the risks associated with their use, storage, cultivation, harvesting, processing or transportation can be reduced.</u></p> <p>(e) <u>As the Council has adopted a prohibited status for the release of all GMOs and the field testing of all GMOs (unless specifically provided for), while approval could be sought and obtained from the EPA their use would be unable to be carried out within the Waikato District.</u></p> <p>(f) <u>The necessity and relevance of the prohibited activity status for field trialling of GMOs that fail to meet discretionary standards, and the release of GMOs will be reconsidered at the next plan review. If in the meantime GMO use is proven to be safe and advantageous and the community then accepts that a precautionary approach is no longer warranted, then their prohibited activity status may be overturned by a plan change. This could either be in relation to GMOs in general, or to a specific GMO for which there is a demand for in the community and which poses a low risk</u></p>		

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
			<p align="center"><u>with regard to adverse effects and to the economic viability of the production and marketing of GE free produce.</u></p>		
707	Soil & Health Association of New Zealand (S&H)	submission point 707.2	<p>Amend Chapter 10 Heading as follows: Chapter 10: Hazardous Substances and Contaminated Land and Genetically Modified Organisms</p> <p>Add section 10.3 Genetically Modified Organisms, as follows:</p> <p><u>10.3 Genetically Modified Organisms 10.3.1 Objective- Adverse effects of Genetically Modified Organisms</u></p> <p>(a) <u>To protect the community and their social, economic and cultural wellbeing and environment from the adverse effects associated with the outdoor release or field trials of Genetically Modified Organisms through the adoption of a precautionary approach</u></p> <p><u>10.3.2 Policy- Precautionary approach to managing Genetically Modified Organisms</u></p> <p>(a) <u>To adopt a precautionary approach to the management of Genetically Modified Organisms by prohibiting the release of a Genetically Modified Organism and the field trials of a Genetically Modified Organism, except as specifically provided for as a permitted activity or discretionary activity.</u></p> <p><u>10.3.3 Policy-District specific approach to managing Genetically Modified Organisms</u></p> <p>(a) <u>To adopt a resource management framework for the management of Genetically Modified Organisms (GMOs) that is District specific taking into account environmental, economic, cultural and social well-being considerations.</u></p> <p><u>10.3.4 Policy-Consent applications for selected outdoor use of Genetically Modified Organisms (GMOs).</u></p> <p>(a) <u>To allow consent applications to be made for the use of a viable Genetically Modified Veterinary Vaccine that does not meet permitted standards as a discretionary activity.</u></p> <p>(b) <u>To allow consent applications to be made for a field trial of a Genetically Modified Organism as a discretionary activity, provided specific standards are met.</u></p> <p>(c) <u>To require the holder of a resource consent granted for the field trialling of a Genetically Modified Organism to be</u></p>	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.



No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
			<p><u>financially accountable (to the extent possible) for any adverse effects associated with the activity, including clean-up costs, remediation and monitoring.</u></p> <p>(d) <u>Require that the field trialling of a Genetically Modified Organism does not result in migration of Genetically Modified Organisms beyond the area designated by the consent</u></p> <p><u>10.3.5 Policy- Future review of Genetically Modified Organism provisions</u></p> <p>(a) <u>To review the Plan provisions relating to Genetically Modified Organisms, particularly if there is new information on benefits and/or adverse effects of a Genetically Modified Organism Activity and/or there is a general community acceptance of the use of Genetically Modified Organisms that have proven to be safe and economically beneficial without adversely affecting the environment and the general social and economic wellbeing of the community.</u></p>		
707	Soil & Health Association of New Zealand (S&H)	submission point 707.6	Add objectives and policies to address the cultural impact of Genetically Modified Organisms on mana Whenua and the environment	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
721	Jennifer Berczely	Oppose submission point 721.1	Add strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms that are the same or similar to those in the Far North District Plan, Whangarei District Plan and Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
733	Dave Currie	Oppose submission point 733.1	Add strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms that are the same (or similar) as those in the Far North District Plan, Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
733	Dave Currie	Oppose submission point 733.2	Add a resource management framework for the management of genetically modified organisms that is region specific, taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
744	Peter McCallum	Oppose submission point 744.1	Add a resource management framework for the management of GMOs that is regional specific taking into account environmental, economic and social well-being considerations	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
744	Peter McCallum	Oppose submission point 744.2	Add strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms that are the same (or similar) to those in the Far North District Plan, Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
744	Peter McCallum	Oppose	Amend the Proposed District Plan to require all consent	My reasons for opposing this submission point	Disallow this whole

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
		submission point 744.3	applications to be automatically publically notified, regardless of whether the application is regarding genetically modified organisms or not.	are set out under point 245.3 above.	submission point.
755	Jade Penn	Oppose submission point 755.1	Amend the Proposed Waikato District Plan to include a resource management framework for the management of Genetically Modified Organisms that is regional specific taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
755	Jade Penn	Oppose submission point 755.2	Amend the Proposed Waikato District Plan to include strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same, or similar, as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
755	Jade Penn	Oppose submission point 755.3	Amend the Proposed Waikato District Plan to require consents which would require exemption from plan rules, to be automatically be publicly notifiable, whether the rules are on Genetically Modified Organisms or any other matter.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
757	Karen White	Oppose submission point 757.12	Amend the Proposed Waikato District Plan to include a resource management framework for the management of Genetically Modified Organisms that is regional specific taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
757	Karen White	Oppose submission point 757.13	Amend the Proposed Waikato District Plan to include strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
758	Clifford & Maureen Bayliss	Oppose submission point 758.1	Amend the Proposed Waikato District Plan to include a resource management framework for the management of Genetically Modified Organisms that is regionalspecific taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
757	Clifford & Maureen Bayliss	Oppose submission point 758.2	Amend the Proposed Waikato District Plan to include strong precautionary and prohibitive provisions, policies and rules relating to GMOs that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan, to ensure a consistent approach across Northland, Auckland the Waikato.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
759	Tracey Bayliss	submission point 759.1	Amend the Proposed Waikato District Plan to include a resource management framework for the management of Genetically Modified Organisms that is regional specific taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
759	Tracey Bayliss	submission point 759.2	Amend the Proposed Waikato District Plan to include strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
			District Plan and the Auckland Unitary Plan, to ensure a consistent approach across Northland, Auckland the Waikato and to eliminate cross boundary issues		
762	Simon Thomson	submission point 762.1	Amend the Proposed District Plan to include a resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and social wellbeing considerations	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
762	Simon Thomson	submission point 762.2	Amend the Proposed District Plan to include strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
762	Simon Thomson	submission point 762.3	Amend the Proposed District Plan to include that liability for spread and damage caused by Genetically Modified Organism's be with the owners of that genetic material, and secondly local and regional councils.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
762	Simon Thomson	submission point 762.4	Amend the Proposed District Plan to require those who introduce Genetically Modified Organism material into the environment be required to pay a bond to council equal in order of magnitude greater than any possible clean-up to eradicate at the genetic material.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
776	GE Free Northland (in food & environment)	submission point 776.1	Add a resource management framework for the management of genetically modified organisms that is region specific, taking into account environmental, economic, cultural and social well-being considerations	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
776	GE Free Northland (in food & environment)	submission point 776.2	Add strong precautionary and prohibitive provisions, policies and rules relating to genetically modified organisms that are aligned with those in the Far North District Plan, the Whangarei District Plan, the Auckland Unitary Plan and Northland Regional Policy Statement	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
780	Whaingaroa Environmental Defence Incorporated Society	submission point 780.39	Add a new chapter that provides the following:  A resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and social well-being considerations. Strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan, to ensure a consistent approach across Northland, Auckland and the Waikato and to eliminate cross boundary issues.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
788	Susan Hall	submission point 788.10	Amend the Proposed District Plan so that consents which would require exemption from plan rules should automatically be publicly notifiable, whether the rules are on Genetically Modified Organisms, or any other matter.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
788	Susan Hall	submission point 788.6	Add a resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and social well-being considerations	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
788	Susan Hall	submission point 788.9	Add strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same or similar to those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
789	BioAgriNomics Ltd	submission point 789.1	Add strong precautionary and prohibitive policies and rules relating to the management of Genetically Modified Organisms that are the same or similar to those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
789	BioAgriNomics Ltd	submission point 789.2	Add a resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and social well-being considerations	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
789	BioAgriNomics Ltd	Oppose submission point 789.3	Seeks Genetically Modified Organisms and all genetically engineered products completely banned from being introduced into New Zealand	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
795	Hinemaria Ward-Holmes	Oppose submission point 795.1	Add strong precautionary and prohibitive policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan, to ensure a consistent approach across Northland, Auckland and the Waikato and to eliminate cross boundary issues	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
795	Hinemaria Ward-Holmes	Oppose submission point 795.2	Add a resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
802	Vera van der Voorden	Oppose submission point 802.1	Add strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms, that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
802	Vera van der Voorden	Oppose submission point 802.14	Add a resource management framework for the management of Genetically Modified Organisms that is regionally specific, taking into account environmental, economic and social well-being considerations.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
825	John Lawson	Oppose submission point	Add a new chapter that provides the following:	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

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		825.39	<ul style="list-style-type: none"> <li>A resource management framework for the management of Genetically Modified Organisms that is regionally specific taking into account environmental, economic and social well-being considerations.</li> <li>Strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same (or similar) as those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan, to ensure a consistent approach across Northland, Auckland and the Waikato and to eliminate cross boundary issues.</li> </ul>		
830	Linda Silvester	submission point 830.19	Add strong precautionary and prohibitive provisions relating to Genetically Modified Organisms that are the same or similar to those in the Far North District Plan, Whangarei District Plan and Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
830	Linda Silvester	Oppose submission point 830.20	Amend the Proposed District Plan to require public notification of resource consent applications, regardless of whether the rules are Genetically Modified Organisms or any other matter	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
830	Linda Silvester	submission point 830.6	Add A resource management framework for the management of Genetically Modified Organisms that is regionally specific and takes into account environmental, economic and social wellbeing.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
942	Angeline Greensill	Oppose submission point 942.24	<p>Add a separate chapter to include a separate chapter addressing Genetically Modified Organisms that prohibits the release of Genetically Modified Organisms into the rural environment through field trials, similar to the provisions of neighbouring Councils e.g. Auckland.</p> <p>AND</p> <p>Amend the Proposed District Plan to require all applications for Genetically Modified Organism releases to be publicly notified.</p> <p>AND</p> <p>Amend the Proposed District Plan to require a bond be imposed to cover clean up should the EPA approve applications for the release of Genetically Modified Organisms in the district</p>	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
963	June Penn	Oppose submission point 963.1	Add a resource management framework for the management of Genetically Modified Organisms that is regionally specific, taking into account environmental, economic and social well-being.	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.
963	June Penn	Oppose submission point 963.2	Add strong precautionary and prohibitive provisions, policies and rules relating to Genetically Modified Organisms that are the same or similar to those in the Far North District Plan, the Whangarei District Plan and the Auckland Unitary Plan	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

No.	The specific submission that my further submission relates to:	The particular parts of the submission I support or oppose are:	Submission Topic	The reasons for my support or opposition are:	Whether the whole or part of the submission be allowed or disallowed
963	June Penn	Oppose submission point 963.3	Amend the Proposed District Plan so that all consents/activities that would require exemption from plan rules would be publicly notified, regardless of whether they are on genetically modified organisms or not	My reasons for opposing this submission point are set out under point 245.3 above.	Disallow this whole submission point.

*Use additional sheets if necessary.*

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