



SUBMISSION TO

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY NEW
ZEALAND

on the

proposed regulations for the management (through segregation and
traceability schemes) of conditionally released genetically modified
(GM) organisms, particularly crops.

By

DEER INDUSTRY NEW ZEALAND

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PROPOSED REGULATIONS FOR THE MANAGEMENT (THROUGH SEGREGATION AND TRACEABILITY SCHEMES) OF CONDITIONALLY RELEASED GENETICALLY MODIFIED (GM) ORGANISMS, PARTICULARLY CROPS.

Deer Industry New Zealand (DINZ) is the levy funded industry-good body established under the Deer Industry New Zealand Regulations (2004). One of its key functions is to promote and assist the development of the deer industry in New Zealand. DINZ, along with other primary sector industry organisations has a significant interest in maintaining robust biosecurity measures to preserve valued perceptions of clean, disease-free and sustainable New Zealand's primary products for overseas markets.

DINZ invests a significant proportion of industry-good funds into research and development that will benefit the New Zealand deer industry, particularly research and development that increases production efficiency and addresses sustainability issues. Biotechnology is a rapidly advancing field of science that can offer many tools and potential solutions to the deer industry and other pastoral based livestock industries in those areas. DINZ, via its joint partnership (with the New Zealand Deer Farmers Association and AgResearch Ltd) research body DEEResearch Ltd, invests in Pastoral Genomics, a research consortium that uses biotechnology to provide improved forages that will offer production gains (increased biomass), future proofing to climate change (drought tolerance) and sustainable, efficient resource use (water and nitrogen use efficiencies).

DINZ therefore wishes to express concern over the proposed regulations for the management of conditionally released genetically modified organisms (GMOs) and the very limited time available for public submission. DINZ notes that several organisations (Pastoral Genomics, AgResearch and the Life Sciences Network) which are more closely affected by the proposed regulations are intending to make submissions and DINZ wishes to register its support for the substance and intent of the submissions by those organisations.

The short period available for public submission makes it difficult to comment in detail on the proposals but DINZ wishes to state the following concerns:

- The public register of GMO locations. While there is a need to register locations to an independent authority such as ERMENZ, a public register impinges on commercial sensitivity and intellectual property. The balance between public accountability and private rights appears to be skewed unreasonably toward the former. Likely outcomes from this would be a decrease in the value of investing in research and development in this area as more investment is channelled toward security measures (to prevent vandalism and disruption) and less on actual research. Depending on the perceived risks that a public register might generate, investment might cease all together.
- Traceability. The concept of traceability is not without merit, but such merit must include pragmatic considerations of cost of administration and ease of use. There are already examples of government-led traceability and accountability initiatives that appear problematical in terms of cost imposition and practicality. DINZ wishes to see a more considered approach to this aspect and comparisons including cost benefit analyses of various



traceability schemes. Cumbersome and expensive schemes will further act as a disincentive to ongoing investment.

- Prescriptive regulations as proposed appear to remove much of the science-based risk assessment decision-making ability of ERMANZ. The range of potential GMOs that could be subject to conditional release would suggest that applications should be assessed according to the specific contexts of each application rather than a prescriptive approach. Conditions of release as determined by ERMANZ would therefore be more likely to be both cost effective and environmentally benign.
- The two week submission period does not allow indirect stakeholders (such as DINZ) to fully consider all the impacts or possible benefits that the proposals may offer. An extended period of consultation and discussion would allow a more inclusive approach and result in a submission process that would give DINZ more confidence in the intent and outcome of the proposals.

In concluding this submission DINZ would like to note that the use of biotechnology to provide *significant* improvements to the pastoral sector represents one approach that has considerable promise and potential to add value to the New Zealand economy and reduce impacts to the environment. There are not many other approaches that offer similar promise for pastoral based livestock industries and stifling of this option through poorly designed regulations can severely compromise the ability for these and other industries to further contribute to the New Zealand economy and society.

On behalf of Deer Industry New Zealand.

A handwritten signature in black ink, appearing to read "Lindsay Fung".

Lindsay Fung
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