

s 9(2)(a)

s 9(2)

Sent: Monday, 3 August 2015 11:13 a.m.
To: NES PF Consultation
Subject: Submission on the National Environmental Standard for Plantation Forestry (N.E.S.-PF).

To:
NES-PFConsultation@mpi.govt.nz

Submission on the National Environmental Standard for Plantation Forestry (N.E.S.-PF).

From: s 9(2)(a)
Address: s 9(2)(a)

Phone: s 9(2)(a)
E-mail: s 9(2)(a)

Privacy issue: I do not want my personal details made public.

This is my response to the N.E.S.- P.F. consultation document.

I do not approve of the following aspects.

I refer to page 43 article 6.4 , and to subsequent pages 64 and 82. Matters dealing with G.M.Os.

Article 6.4, and the other referenced pages, state that under this regulation Genetically Modified Organisms (G.M.Os) may be planted in N.Z forests, and that Genetic Engineering (.G.E.) may be carried out on native trees. Moreover , G.E. trees may be used when re-planting existing forests after felling. The people of New Zealand do not want any G.M.Os planted in N.Z. , or G.E. experiments. They have made this clear in National polls and a significant number of councils, district and regional have protective and precautionary statements on G.M.Os in their long term plans. These are the councils. (You will note this list include the New Greater Auckland Council.)

New Greater Auckland Council
Northland District Council
Northland Regional Council,
Kaipara District Council
Whangarei District Council.

This area is also the Maori region of Tai Tokerau, and all of the above councils have banded together in a group to monitor G.M.Os. (Inter - Council Working Party on G.M. O. Risk Evaluation and Management Options .) Northern Maori reject all aspects of G.E.and G.M.Os. It is counter to Te Tiriti .

Other Councils with protective and precautionary statements are those of:

Hawkes Bay
Nelson
Bay of Plenty
Hastings.

These are a significant part of the population and agricultural areas of New Zealand.

And therein lies the reason for this parody of consultation. Regulations do not need to go the people. Yet, you are taking this to the people to give the APPEARANCE of consultation. It is also significant that there was no mention of GE in the document taken around to the group meetings in the provinces; and also the

repeated lies made on this tour that this has the approval of : Forest and Bird and New Zealand Forestry Association. Item 6.4 was added after they had left the planning stages. They strongly oppose all aspects of G.E., as does the Soil and Water Association.

Regional problems need local regional solutions. It is why we have local and regional councils. This statement takes away their power to regulate for their local environmental and climatic conditions as well as cater for the needs and welfare of the local people. That is what government is about. The NES-PF states that it can over-ride any local regulations.

This is an attack on democracy and a way around the the Resource Management Act which allows the rights of local government bodies to regulate for the care of their communities.

This right was upheld this year in an Environmental Court ruling that found the Hazardous Substances and New Organisms Act (H.S.N.O.) and the Environmental Protection Act (E.P.A.) were unable to to give adequate protection on G.E. and G.M.Os : that it was necessary to have local precautionary and protective regulations in regions and districts .

As it stands this document threatens the ecology, environment (specifically soil and water pollution and erosion and silting and flooding) , regional economies , and the national economy.

Most of N.Z.'s exports go to countries that reject all G.M.O. tainted produce. We will lose these markets . International forest organisations will not allow trade in G.E. trees. Dairy cows exposed to G.E. (micro-organisms!) tainted water will be suspect and trade will disappear. (Horizontal transfer of micro-organisms has obviously slipped under the radar of your investigation int G.E.and G.M.Os.) These are two of our biggest export earners.

Present forest methods as set out in NES_PF are now out of date . Progressive countries have learnt from the damage done by mono -culture forests , clear felling , techniques that have degraded the soil and water and caused waterways to silt up, and the pollution of chemicals and fertilizers that destroy the environment. They have moved on.

Progressive countries are working WITH nature and are re-planting indigenous or other valuable timber trees that are being farmed conservatively. This allows the recovery of essential bird and insect and animal life (the general natural ecology) in these natural environments. It means a sustainable form of forestry and a healthy environment for all life forms.. Also, natural genetic research is out-pacing and out -performing G.E.. This would be the sensible route to go down.

For these main reasons this document should be withdrawn and proceed no further.

It is also essential to have total moratorium on all aspects of G.M.Os and G.E. until there has been a complete review of G.E. and G.M.Os the issues debated by the whole of parliament, and a conscience vote taken.

It is beyond the rights of any government to make this kind of decision on its own. The PEOPLE must have a say.

It must go to the whole of parliament and the people: not touted around in a dishonest , empty, pro-forma submission process which has already been decided before going to the people.

Signed: s 9(2)(a)

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s 9(2)
(a)

Submission Form for the Proposed National Environmental Standard for Plantation Forestry

Email to NES-PFConsultation@mpi.govt.nz OR

Post to : Stuart Miller, Spatial, Forestry & Land Management
Ministry for Primary Industries
P O Box 2526, WELLINGTON 6140

My Name ...s 9(2)(a)

Postal Address ...s 9(2)(a)

Privacy Issue I **do not** want my personal details made public

In response to the MPI's proposed National Environmental Standard (NES) for Plantation Forestry, I make the following comments:

- 1) I **support** the attempt to protect the waterways, including **controls on sedimentation**, although provision should be made for regional and district councils to impose more stringent controls if that is desired by the relevant communities, and/or if this is required in order to achieve a specific level of water quality.

Relief sought: The NES to be worded to provide for regional and district councils to impose more stringent controls.

- 2) I **oppose** the attempt to introduce, as a permitted activity, the planting of **Genetically Engineered tree stocks** in either field trials or plant releases in New Zealand, and specifically refer to clause 5.2 "What the Changes will Mean for Existing Plans" which replaces existing council plan rules for forestry activities and allows the NES-PF to supersede these, along with clause 6.4 on page 43 "Hazardous Substances and New Organisms Act 1996" which allows for the introduction of GMO-trees throughout New Zealand. A strong precautionary approach to the outdoor use of Genetically Modified Organisms should prevail.

My reasons are outlined as follows:

- a) On the one hand, the NES appears to be concerned with the water quality and sedimentation of our water ways, yet on the other hand is quite happy to put all of New Zealand's terrestrial biodiversity at risk by providing for GMO trees, the long term risks of which have not been sufficiently tested. There is adequate evidence to suggest that the introduction of GMO trees will, indeed, affect native forests, and all life that resides within the soil structure. As history has already proven, we cannot rely on those making decisions under the HASNO Act, as there have been numerous breaches of conditions on

issued permits because they were not thoroughly monitored. To put all of New Zealand's (and NO, this is NOT exaggerated!!) biodiversity at potential risk is irresponsible to say the least, and flies in the face of the UN Convention on Biological Diversity which New Zealand is a signatory to. I suggest you should do your homework properly before introducing such potential risks into the country.

- b) The introduction of GMO trees will also affect New Zealand's clean and green image. This image is important to all of our other exporters. Why even contemplate jeopardising this? This image is, or can be, worth far more than the use of GMO trees used for paper pulp.
- c) Most importantly, some communities have already decided, through a democratic process, that they are not willing to risk their environment by introducing GMO organisms. The issue of introducing GMO trees was not properly consulted on as part of the NES process. It was a last minute addition, and is therefore a sneaky way to try and undermine the clear will of these communities. Stop the arrogance, and show some true democratic behaviour. We keep being told that we live in a democracy. Now, show us that we do!
- d) I work in a farming environment and have done a lot of reading and research into genetically modified organisms, especially research that can be classed as being 'independent' i.e. not sponsored by those who have a stake in the development of GMO organisms. The technique used to genetically modify crops or trees is far from precise, and has plenty of unintended consequences which, long term, could be devastating in many ways. I would not like to see my livelihood affected in such an adverse manner.

Relief sought: I urge you very strongly to remove all wording referring to genetically modified trees and rootstock from the NES-PF (i.e. NES-PF 6.4, P43, 64 & 82). I object to MPI's proposed section 6.4 and want it removed from the new NES for plantation forestry. The proposal seeks to remove NZ councils' precautionary and prohibitive GE policies. These must be retained. Local councils have the right (and obligation) to prevent outdoor GE tree experiments and GE tree releases (using the RMA).

Signature s 9(2)(a)



Proposed National Environmental Standard for Plantation Forestry

Template for Submitters

We would like to hear your views on the proposed NES-PF.

Please feel free to use this template to prepare your submission. Once complete please email to NES-PFConsultation@mpi.govt.nz.

As stated in section 8.2 of the consultation document, your submission must include at least the following information:

- your name, postal address, phone number and, if you have one, email address
- the title of the proposed standard you are making the submission about
- whether you support or oppose the standard
- your submission, with reasons for your views
- any changes you would like made to the standard
- the decision you wish the Ministers to make.

When commenting on specific draft rules, please be as clear as possible which rule you are referring to and provide a reference e.g. to the relevant page number, heading or text.

For more information about how to make a submission, please refer to section 8 of the consultation document.

Contact details

Name:

s 9(2)(a)

Postal address:

s 9(2)(a)

Phone number:

s 9(2)(a)

Email address:

s 9(2)(a)

Are you submitting on behalf of an organisation? Yes [] No []

If yes, which organisation are you submitting on behalf of?

s 9(2)(a)

If you are a forest owner/manager, what size of forest do you own/manage (in hectares):

15ha



Privacy Act 1993

Where you provide personal information in this consultation MPI will collect the information and will only use it for the purposes of the consultation. Under the Privacy Act 1993 you have the right to request access and correction of any personal information you have provided or that MPI holds on you.

Official Information Act 1982

All submissions are subject to the Official Information Act 1982 and may be released (along with the personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

Please indicate below if you wish your personal details to be withheld:

☐ Please withhold my personal details where submissions are made public

☐ Please withhold my personal details in response to a request under the Official Information Act 1982

Questions for submitters

The questions for submitters that are included throughout the consultation document are provided below. We encourage you to provide comments to support your answers to the questions below.

1. Do you think section 2.1 and 2.2 of the consultation document accurately describe the problem facing plantation forestry?

Only partly

Please provide comments to support your views.

The fact of GE Trees, which should not be permitted at all, has been left out and is of equal importance, at least, with the problems stated in section 2.1 and 2.2

2. Do you consider that the conditions for permitted activities will manage the adverse environmental effects of plantation forestry?

Somewhat, perhaps

Please provide comments to support your views.



Prohibition and controls on what farmers/landholders do on their properties rarely have long term positive effects. Education, advice, assistance and guidance are always far more effective methods. However, large companies/corporations are a different matter a great deal of care and caution should be exercised with regard to their activities. GE being a very indicative case in point. GE trees/plants should not be permitted until there is definitive proof that there are NO adverse effects now in the future, especially as there is scientific studies that show numerous adverse effects.

3. Are the conditions for permitted activities clear and enforceable (see appendix 3 of the consultation document)? Can you suggest ways of making the rules clearer and more enforceable?

Not clear and enforcement may not be best method

Please provide comments to support your views.

Indeterminate phrases such as 'significant affects' need to be more precise and guidance rather than enforcement is more effective, except of course, in the case of large companies and corporations where the default should be prohibition unless very stringent controls are adhered to.

4. Are the matters where local authorities can retain local decision-making appropriate (summarised in Table 2 and Table 4 and provided in detail in Appendix 3 of the consultation document)?

Seems so at the moment

Please provide comments to support your views.

Depends on the final wording

5. Will the environmental risk assessment tools (the Erosion Susceptibility Classification, the Wilding Spread Risk Calculator, and the Fish Spawning Indicator) appropriately manage environmental effects as intended (see section 3.5 of the consultation document)?

Seems so at the moment

Please provide comments to support your views.

Time will tell

6. Do you have any comments about any particular activity or draft rule (see appendix 3 of the consultation document)?

yes

Please include reference to the rule you are referring to.

Wilding spread should also be considered for GE trees in that this is a major risk and these kind of trees/plants should not be permitted at all



7. Is the NES–PF the best option to meet the assessment criteria (in Box 13 of the consultation document)?

Too soon to tell

Please provide comments to support your views.

Please enter your comments here ...

8. Have the expected costs and benefits of the NES-PF been adequately identified (see section 4.3 of the consultation document)?

Too soon to tell

Please provide comments to support your views.

Please enter your comments here ...

9. Are there any issues that may affect the successful implementation of the NES-PF (such as decision-makers applying the permitted baseline test more frequently)?

Don't know

Please provide comments to support your views.

Please enter your comments here ...

10. Please describe any risks or opportunities that you consider have not been identified or addressed in the proposal.

GE trees/plants need to be prohibited

11. Will the proposed NES-PF support regional councils to implement the NPS-FM (see section 6.1 of the consultation document)?

Seems to

Please provide comments to support your views.

Please enter your comments here ...

12. What resources or other implementation activities would help you to prepare for and comply with the proposed NES-PF (see section 7 of the consultation document)? How should these activities be delivered (for example, training, online modules, guidance material)?

Guidance material.

13. Are there any other issues that you would like to raise?

Already have raised issues re GE trees/plants



Spatial, Forestry and Land Management
Ministry for Primary Industries
PO Box 2526
Wellington 6140

Stuart Miller NES-PFConsultation@mpi.govt.nz

Re: Submission Proposed National Environmental Standard for Plantation Forestry (NES-PF)

Dear Minister Guy,

We oppose the Proposed Standard – NES & other relevant legislation: 6.4 - Genetically modified tree/root stock (p. 43, Appendix 3, Afforestation, p. 64 & Replanting, p. 82)

Submission and Reasons –

The GM clauses on p. 43, 64 & 82, in the proposed NES – PF do not meet the objectives of environmental protection for communities, nor does the standard take into account the inherent dangers and liabilities associated with novel genetic technology and its potential contamination of - soils, indigenous and exotic flora & fauna, pruning debris, waterways, trophic ecosystems and waterways.

We ask that you remove all conditions and references permitting genetically modified organisms to be the sole responsibility of the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms Act (HSNO) and allow Councils to manage Regional and District land use through their mandated planning functions' under the Resource Management Act (RMA).

Both the Environment Court and the Royal Commission on Genetic Modification (Chapter 13, Recommendation 13.1, H1, p.339) have stated the clear responsibilities and boundaries between the EPA and Council jurisdiction, there is no "duplication" between the HSNO or RMA once a GMO is released. This must not be undermined by any clause in the proposed NES-PF.

The Environment Court, Judges Thomson and Newhook, decision upheld the Councils ability, under the RMA, to place policies, rules and objectives, on the management of GMO land use activities as part of their management and planning functions in their regional and district plans [1], [2].

References:

[1] <http://www.boprc.govt.nz/media/321876/environment-court-decision-18-dec-2013-env-2012-339-000041-part-one-section-17.pdf>

[2] <http://www.ge-free.co.nz/assets/pdf/20150512145527872.pdf>

Changes we would like you to make -

Remove all GM clauses in the proposed NES – PF and references permitting genetically modified organisms to be the sole responsibility of the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms Act (HSNO) and

Retain and provide for Local Bodies to place more GM stringent land use rules, objectives and policies in their plans for the management of the natural and physical resources through their mandated planning functions' under the Resource Management Act (RMA).

Protect the Local Bodies mandate and duty of care, under the RMA, to the existing foresters, primary producers and businesses in their region and districts so they can maintain their responsibilities with national and global certification bodies.

Ensure that the Regional and District Councils have the ability, under the RMA, to create a much needed additional tier of local protection against the risks of outdoor release and use of GMOs.

The decision we would like the Minister to make

1. Remove all wording in the NES-PF in 6.4 p.43, Appendix 3; Afforestation: p. 64 & Replanting: p. 82, referring to genetically modified trees and rootstock.

2. Place an added condition in the proposed NES-PF stating that Local Bodies can set more stringent rules, objectives and policies on GMO's as part of their land use planning function, under the RMA, when addressing the economic, social and cultural wellbeing of their communities.

Please keep us informed.

Sincerely

s 9(2)(a)

s 9(2)(a)

Privacy issue: I do not want my personal details made public

Re: Proposed National Environmental Standard for Plantation Forestry

I oppose the proposed standard NES-PF 6.4 Genetically modified tree/root stock (p. 43) and the relevant supporting clauses in Afforestation (p. 64) and Replanting (p.82).

My reasons are:

- I would like to see a precautionary approach allowed to the outdoor use of genetically modified organisms (GMO).
- The proposed clauses are anti-democratic. They would allow a small, non-elected group (the EPA) to over-ride the wishes and district plans of democratically elected local councils such as the Northland Regional Council and Whangarei District Council. These councils have taken a precautionary approach to the outdoor use of genetically modified organisms because that has been the expressed wish of a majority of their constituents, because of valid concerns over the shortcomings of the HSNO Act and the EPA.
- The proposed NES clauses were not in the original consultation document. They have been added at the last moment, without consultation.
- The proposed NES clauses are a devious, back-door way of allowing the outdoor use of GMO in NZ. Such use would be a major step for NZ, and is very controversial because so many New Zealanders oppose it. It should be debated publicly and the decision should be made democratically.
- As consumers become better educated and more discerning about environmental standards and the provenance of consumer products, standards such as Forest Stewardship Council certification will become more and more important in marketing. NZ timber products are currently eligible for such schemes because they are from plantation forests, as opposed to native logging. However even the possibility of being contaminated by GMO would immediately disqualify them.
- I am very concerned that it has proven impossible to contain GMO once they have been used outdoors, and that this adversely impacts other growers whose products are either contaminated by GMO or suspected of contamination. Consumers don't want GMO products, that's why no producer ever proudly declares "GMO" on the label.
- The HSNO Act does not specify liability for clean-up costs if GMO should escape, and the EPA cannot be relied upon to require bonds or evidence of ability to pay from those applying to plant GM trees. The proposed standard NES-PF 6.4 and related clauses (p. 43, 64, 82) remove the ability of local councils to provide for clean-up liability before any escape happens, but councils and ratepayers will be left with the bill for the clean-up, if a clean-up is even possible. It will be another leaky homes fiasco.

Signature: .

s 9(2)(a)

9 August 2015

Ministry for Primary Industries

P O Box 2526, WELLINGTON 6140

NES-PFConsultation@mpi.govt.nz

Attention: Stuart Miller, Spatial, Forestry & Land Management

Submission Form for the Proposed National Environmental Standard for Plantation Forestry (NES-PF)

My Name: s 9(2)(a)

Postal Address: s 9(2)(a)

Phone: s 9(2)(a) Email: s 9(2)(a)

Privacy Issue I do not want my personal details made public

The sections I object to are:

Section 5.1 & 5.2

I do not agree that the NES-PF should replace district and regional Council's existing plan rules for forestry. I do not agree that: where there is a conflict between existing council rules and NES-PF, then NES-PF rules will supercede the Council's rules.

These existing rules are the results of the democratic wish of the community to include local precautionary GMO provisions in its local plan. I strongly object to the removal of these rules.

While standardisation of rules NZ wide is understandable in a number of circumstances, local communities should be able retain their localised rules when the community has decided to do so.

Section 6.4

Genetically modified organisms are regulated under HASNO Act 1996. The NES-PF will include a clause allowing GMO's as approved by Environmental Protection Agency under the HASNO Act.

Northland has previously consulted widely and received overwhelming public support to include the precautionary principle for genetic modified organisms in its plans. Recently, the Environment Court has ruled that Councils have this ability to do so – albeit the ruling is now subject to an appeal.

The local community has determined that the HASNO Act 1996 has several gaps and does not provide sufficient precautionary protection. The Environmental Protection Agency does not have to abide by this precautionary principle. Furthermore, there is no liability for any damage, loss or harm

to the community caused by the releases of GMO's. And to now add insult to this, the recent appointed head of EPA is a GMO advocate – a blatant conflict of interest.

In summary, I consider there is growing evidence of the detrimental effects of GMO's that the global legally accepted precautionary provision should be included in all laws and regulations and it is the community's democratic right to retain this provision in its council plans.

Kind regards

s 9(2)(a)



Proposed National Environmental Standard for Plantation Forestry

Template for Submitters

We would like to hear your views on the proposed NES-PF.

Please feel free to use this template to prepare your submission. Once complete please email to NES-PFConsultation@mpi.govt.nz.

As stated in section 8.2 of the consultation document, your submission must include at least the following information:

- your name, postal address, phone number and, if you have one, email address
- the title of the proposed standard you are making the submission about
- whether you support or oppose the standard
- your submission, with reasons for your views
- any changes you would like made to the standard
- the decision you wish the Ministers to make.

When commenting on specific draft rules, please be as clear as possible which rule you are referring to and provide a reference e.g. to the relevant page number, heading or text.

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Contact details

Name:

s 9(2)(a)

Postal address:

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Phone number:

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Email address:

s 9(2)(a)

Are you submitting on behalf of an organisation? Yes [] No [X]

If yes, which organisation are you submitting on behalf of?

If you are a forest owner/manager, what size of forest do you own/manage (in hectares):



Privacy Act 1993

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☒ [X] Please withhold my personal details where submissions are made public

☒ [X] Please withhold my personal details in response to a request under the Official Information Act 1982

Questions for submitters

The questions for submitters that are included throughout the consultation document are provided below. We encourage you to provide comments to support your answers to the questions below.

1. Do you think section 2.1 and 2.2 of the consultation document accurately describe the problem facing plantation forestry?

Please provide comments to support your views.

I think the consultation document may be overstating the problem. No specific evidence is provided to support the claim that regional or local planning rules are diverging (s21.). Also the supposed uncertainty that exists during the life of a forest does not necessarily lead to unexpected costs at harvest-time—it could lead to increased profits and environmental benefits. It generally seems as if MPI has taken a pessimistic view of RMA outcomes.

2. Do you consider that the conditions for permitted activities will manage the adverse environmental effects of plantation forestry?



Genetically modified tree stock and any genetically modified organisms associated with forestry should not be permitted under the conditions (p64). It is beyond the scope of the NES to impose genetically modified organisms on communities without their consent. There is a breakdown in the logic of the consultation document to argue that commercial companies should get more certainty about commercial gain from GM applications when they and the government and local councils are not prepared to shoulder the potential liabilities and costs. That simply transfers the uncertainties from powerful private interests to councils and communities. The promoters of GM need to gain their consent-to-operate their GM organisms from the rural communities where they seek to make their profits. They should be made to reap what they sew.

The consultation document states that “The proposed scope (of the NES) aims to provide national consistency in relation to the main activities in the forestry life cycle...” (p101). As GM organisms are not a “main activity in the forestry life cycle” it appears that the GM provision has been injected by interests that are marginal or external to the stakeholder group.

The remaining conditions are sensible.

3. Are the conditions for permitted activities clear and enforceable (see appendix 3 of the consultation document)? Can you suggest ways of making the rules clearer and more enforceable?

Please provide comments to support your views.

Please enter your comments here ...

4. Are the matters where local authorities can retain local decision-making appropriate (summarised in Table 2 and Table 4 and provided in detail in Appendix 3 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...

5. Will the environmental risk assessment tools (the Erosion Susceptibility Classification, the Wilding Spread Risk Calculator, and the Fish Spawning Indicator) appropriately manage environmental effects as intended (see section 3.5 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...



6. Do you have any comments about any particular activity or draft rule (see appendix 3 of the consultation document)?

Please include reference to the rule you are referring to.

The blanket permission for genetically modified organanisms (s6.4) should be removed. Controls of these potentially hazardous organisms is covered by separate legislation and the NES should not over-ride these controls. It is quite clear from the government's refusal to hold GM companies liable for the potential consequences of their products that the philosophy of GM companies is to privatise the profits of genetic experimentation while socialising the harms and costs. s6.4 can be removed without reducing the efficacy of the NES.

7. Is the NES–PF the best option to meet the assessment criteria (in Box 13 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...

8. Have the expected costs and benefits of the NES-PF been adequately identified (see section 4.3 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...

9. Are there any issues that may affect the successful implementation of the NES-PF (such as decision-makers applying the permitted baseline test more frequently)?

Please provide comments to support your views.

Please enter your comments here ...

10. Please describe any risks or opportunities that you consider have not been identified or addressed in the proposal.

Please enter your comments here ...

11. Will the proposed NES-PF support regional councils to implement the NPS-FM (see section 6.1 of the consultation document)?

Please provide comments to support your views.



Please enter your comments here ...

12. What resources or other implementation activities would help you to prepare for and comply with the proposed NES-PF (see section 7 of the consultation document)? How should these activities be delivered (for example, training, online modules, guidance material)?

Please enter your comments here ...

13. Are there any other issues that you would like to raise?

Please enter your comments here ...

s 9(2)(a)

From: s 9(2)(a)
Sent: Wednesday, 5 August 2015 4:51 p.m.
To: NES PF Consultation
Subject: submission on Proposed National Environment standard for Plantation Forestry (NES-PF)

s 9(2)(a)

5 august 2015

I do not want my personal details to be made public

I am strongly opposed to the proposed standard - NES & other relevant legislation: 6.4 - Genetically modified tree/root stock (p 43, Appendix 3 - Afforestation P 64 & Replanting p 82).

I ask that you remove from the proposed standard all references permitting GM trees.

reasons for my opposition:

. Overriding the ability of local councils to exercise precautionary and/or prohibitive policies on GMO's amounts to rule by decree. What is the value of the democratic process if many years of hard work can simply be overridden by ministerial decree ?

. Delegating all decisions on GMO's to the EPA is to submit to rule by 'experts'. I am concerned that the EPA can be captured by vested corporate interests and will make decisions which may not be in the best interests of the NZ environment or the NZ economy.

. What research has been done on the long term effects of genetically modified trees in the NZ environment ? Should a cleanup be needed will that even be possible? Will the taxpayer end up footing the bill for any such cleanup?

.I note that the international certification bodies for forestry (FSC and PEFC) both prohibit GM trees in sustainable forests. The implication is that allowing GM trees runs counter to the stated goals of the NES-PF to promote sustainable forestry.

.the likelihood of contamination of non GM trees with pollen or other material from GM trees is very real and would represent a major threat to growers of the non GM trees.

Submission Form for the Proposed National Environmental Standard for Plantation Forestry

Email to NES-PFConsultation@mpi.govt.nz OR

Post to: Stuart Miller, Spatial, Forestry & Land Management
Ministry for Primary Industries
P O Box 2526, WELLINGTON 6140

My Name: s 9(2)(a)

Postal Address: s 9(2)(a)

Phone: s 9(2)(a) Email: s 9(2)(a)

Privacy Issue I do not want my personal details made public

In response to the MPI's proposed National Environmental Standard (NES) for Plantation Forestry, I expect the MPI to take a very strong precautionary approach to outdoor use of Genetically Modified Organisms by prohibiting the planting of Genetically Engineered tree stocks in either field trials or plant releases in New Zealand.

I specifically refer to clause 5.2 "What the Changes will Mean for Existing Plans" which replaces existing council plan rules for forestry activities and allows the NES-PF to supersede these, along with clause 6.4 on page 43 "Hazardous Substances and New Organisms Act 1996" which allows for the introduction of GMO-trees throughout New Zealand.

These are my reasons:

1. The Minister for the Environment and the Minister of Primary Industries in my view should not have the authority to make a decision on the proposed National Environmental Standard for Plantation Forestry.
2. Their ability to make a decision in favour of NES is contrary to the will of ratepayers within the regions of Whangarei District Council, Northland Regional Council and Auckland City Council.
3. The Te Taitokerau region has a dedicated organic vegetable / fruit growing community that needs to be protected from possible genetically modified organism contamination.
4. I am satisfied and appreciative of the precautionary approach adopted by the Whangarei District Council and Northland Regional Council with regards to genetically modified / genetically engineered organisms.
5. I disagree with the Environmental Protection Agency (EPA) having sole responsibility under the Hazardous and New Organisms Act (HASNO) to

permit, genetically modified organisms / genetically modified trees into the physical environment of Aotearoa-New Zealand.

Signature

s 9(2)(a)

Proposed National Environmental Standard for Plantation Forestry

Submission: Aug 01, 2015

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

I oppose the Standard in its present form.

Please withhold my personal details where submissions are made public.

I am a farm forester with over 150 hectares of forest planted on our farm in many blocks to prevent erosion and for sustainable land use. A consistent planting programme carried out over the last 30 years. We have benefitted from the East Coast Forestry Project for some blocks.

As part of an employment contract I have driven many of the back country roads of the East Coast (2011-2015). I have witnessed vast forestry harvesting due to the timing of the harvests most of which were planted post Cyclone Bola as a result of public funding. Photos below.

The damage to these steeplands by harvesting is quite dramatic, as dramatic in my view as the original cyclone damage.

1. Topsoil is shifted or removed during steepland harvesting leaving the parent rock bare in many slopes. What topsoil will be left after the second, third, fourth harvests?
2. In times of heavy rain the forestry slash heads to the coast damaging down stream fences and farms and clogging the beaches. The affected community is powerless.
3. In heavy rain the replanted forest is unable to hold the slopes so the forested land is no longer protected for about 10 years. That means that if a forest is harvested at 23-28 years and good percentage of the time the land is under-protected for soil conservation.

My submission is that the East Coast forests have been planted on land that is far too steep for temporary forests due to that special financial incentive (i.e. forest was planted without much forethought). Therefore that means:

- a. special attention and rules able to be made by the consenting authority particularly in the Gisborne District (and any other crucial land areas)
- b. allowance for future rules by a consenting authority to disallow the planting or re-planting of a production or non-permanent forest based on slope
- c. the need for forestry standards that will admit sustainable land use decisions in the very long term.

These 7 photos are taken by me from roadsides (Waimata and Tauwhareparae). What looks like grass is reseeded harvest land replanted with next crop.











Proposed National Environmental Standard for Plantation Forestry

Template for Submitters

We would like to hear your views on the proposed NES-PF.

Please feel free to use this template to prepare your submission. Once complete please email to NES-PFConsultation@mpi.govt.nz.

As stated in section 8.2 of the consultation document, your submission must include at least the following information:

- your name, postal address, phone number and, if you have one, email address
- the title of the proposed standard you are making the submission about
- whether you support or oppose the standard
- your submission, with reasons for your views
- any changes you would like made to the standard
- the decision you wish the Ministers to make.

When commenting on specific draft rules, please be as clear as possible which rule you are referring to and provide a reference e.g. to the relevant page number, heading or text.

For more information about how to make a submission, please refer to section 8 of the consultation document.

Contact details

Name:

s 9(2)(a)

Postal address:

s 9(2)(a)

Phone number:

s 9(2)(a)

Email address:

s 9(2)(a)

Are you submitting on behalf of an organisation? Yes [Yes] No []

If yes, which organisation are you submitting on behalf of?

Pentarch Foret Products Ltd

If you are a forest owner/manager, what size of forest do you own/manage (in hectares):

NA



Privacy Act 1993

Where you provide personal information in this consultation MPI will collect the information and will only use it for the purposes of the consultation. Under the Privacy Act 1993 you have the right to request access and correction of any personal information you have provided or that MPI holds on you.

Official Information Act 1982

All submissions are subject to the Official Information Act 1982 and may be released (along with the personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

Please indicate below if you wish your personal details to be withheld:

☒ Please withhold my personal details where submissions are made public

☐ Please withhold my personal details in response to a request under the Official Information Act 1982

Questions for submitters

The questions for submitters that are included throughout the consultation document are provided below. We encourage you to provide comments to support your answers to the questions below.

1. Do you think section 2.1 and 2.2 of the consultation document accurately describe the problem facing plantation forestry?

Please provide comments to support your views.

Supports the objectives behind the NES and considers the issues facing plantation forestry are accurately described

2. Do you consider that the conditions for permitted activities will manage the adverse environmental effects of plantation forestry?

Please provide comments to support your views.



- Considers that the conditions for permitted activities will manage the environmental effects well, but notes that there will be a need to ensure that the forest planning documents are fit-for-purpose and monitored.

3. Are the conditions for permitted activities clear and enforceable (see appendix 3 of the consultation document)? Can you suggest ways of making the rules clearer and more enforceable?

Please provide comments to support your views.

- Considers the rules to be unambiguous and well written. Providing there is resource available to complete audits or monitoring, the rules should be easily enforceable.

4. Are the matters where local authorities can retain local decision-making appropriate (summarised in Table 2 and Table 4 and provided in detail in Appendix 3 of the consultation document)?

Please provide comments to support your views.

- Believes the matters where councils retain local decision-making are generally appropriate, however disagrees with the permitted activity status granted to afforestation in Land Overlay 3A within the Gisborne area. It is the position of the NZFOA that Gisborne or other Councils should have the right to refuse consents to afforest very high-risk terrain, or to limit the afforestation of such terrain to plantation species that coppice or are more suitable for low intensity harvesting methods (as defined in the NES).

5. Will the environmental risk assessment tools (the Erosion Susceptibility Classification, the Wilding Spread Risk Calculator, and the Fish Spawning Indicator) appropriately manage environmental effects as intended (see section 3.5 of the consultation document)?

Please provide comments to support your views.

Believes the environmental risk assessment tools should provide a base for informed decision making for councils. The tools in question shall have to continue to be updated as required to remain fit-for-purpose and easily accessible and useable. There may also need to be work completed with councils to ensure that these are easily able to be interpreted and applied in real time



6. Do you have any comments about any particular activity or draft rule (see appendix 3 of the consultation document)?

Please include reference to the rule you are referring to.

- Considers that the draft rules are consistent and fair.

7. Is the NES–PF the best option to meet the assessment criteria (in Box 13 of the consultation document)?

Please provide comments to support your views.

- Considers the NES is the best option to meet the assessment criteria. It does note the need for effective assistance to councils and forest owners during implementation.

8. Have the expected costs and benefits of the NES-PF been adequately identified (see section 4.3 of the consultation document)?

Please provide comments to support your views.

- Notes that there may be a period during implementation where support and guidance will be necessary. Councils will require guidance to ensure that the NES is effectively and easily implemented, as well as to ensure that the tools and information provided are user friendly. FOA acknowledges that some councils may face additional costs and resourcing pressures, particularly at phase in, but note however this should be manageable provided there is adequate support and guidance from Central Government

9. Are there any issues that may affect the successful implementation of the NES-PF (such as decision-makers applying the permitted baseline test more frequently)?

Please provide comments to support your views.



- Notes that there is a potential risk that the intent of a process, rule or tool being lost or stringency significantly changed during legal drafting. While this risk is low, there may be a need to provide reassurance and/or assistance to councils and forest owners, as well as a review at a set date to address any concerns.

10. Please describe any risks or opportunities that you consider have not been identified or addressed in the proposal.

Considers that the NES will likely assist in the implementation of the NPS-FW to an extent, however it should be noted that as the NPS-FW is a community-engagement process, in some areas that have been identified by councils and communities as needing additional protection, there may be more stringent controls placed on forestry

11. Will the proposed NES-PF support regional councils to implement the NPS-FM (see section 6.1 of the consultation document)?

Please provide comments to support your views.

- Considers that the NES will be of significant assistance in the implementation of the NPS-FW

12. What resources or other implementation activities would help you to prepare for and comply with the proposed NES-PF (see section 7 of the consultation document)? How should these activities be delivered (for example, training, online modules, guidance material)?

- Supports the EPA having sole decision-making power over the introduction and use of genetically modified organisms.

13. Are there any other issues that you would like to raise?



- Recommends the changing of bullet point two under *Ground disturbance outside riparian margins* found on page 69 of the document (within the permitted activities of harvesting) is altered to read: *All disturbed soil must be stabilised or contained so as to minimise the risk of sediment entering into any water body or coastal water resulting in....* The FOA considers that the use of ‘minimise’ over ‘prevent’ is consistent with the intention of the NES as well as the wording within the rest of this section.



Proposed National Environmental Standard for Plantation Forestry Template for Submitters

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- your name, postal address, phone number and, if you have one, email address
- the title of the proposed standard you are making the submission about
- whether you support or oppose the standard
- your submission, with reasons for your views
- any changes you would like made to the standard
- the decision you wish the Ministers to make.

When commenting on specific draft rules, please be as clear as possible which rule you are referring to and provide a reference e.g. to the relevant page number, heading or text.

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Contact details

Name:

s 9(2)(a)

Postal address:

s 9(2)(a)

Phone number:

s 9(2)(a)

Email address:

s 9(2)(a)

Are you submitting on behalf of an organisation? No

If yes, which organisation are you submitting on behalf of?

If you are a forest owner/manager, what size of forest do you own/manage (in hectares):



Privacy Act 1993

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1. Do you think section 2.1 and 2.2 of the consultation document accurately describe the problem facing plantation forestry?

Please provide comments to support your views.

Please enter your comments here ...

2. Do you consider that the conditions for permitted activities will manage the adverse environmental effects of plantation forestry?

Please provide comments to support your views.

No.



3. Are the conditions for permitted activities clear and enforceable (see appendix 3 of the consultation document)? Can you suggest ways of making the rules clearer and more enforceable?

Please provide comments to support your views.

No. Conditions relating to archaeological sites are open to subjective interpretation and may not be effective e.g 'immediate vicinity'

4. Are the matters where local authorities can retain local decision-making appropriate (summarised in Table 2 and Table 4 and provided in detail in Appendix 3 of the consultation document)?

Please provide comments to support your views.

Yes, but Appendix 3 does not adequately give effect to this. Table 4 states that councils are able to set more stringent rules for places of known cultural or Heritage value. Many councils have historic heritage places, and places of significance or value to mana whenua, that are archaeological sites, included in district or regional plan schedules. However under the provisions in Appendix 3, page 83, the modification or destruction of places meeting the definition of an archaeological site is a permitted activity. There is no exclusion for scheduled places. There is a condition relating to consent under the Heritage NZ legislation, but the archaeological authority process under this legislation can only consider archaeological values, and has limited grounds for declining applications. In practice very few are declined. Archaeological sites may be included in district or regional plan schedules because they are significant in relation to a variety of criteria, including mana whenua value, group or context, historical, or social community value.

An additional condition should be included in Appendix 3, excluding scheduled places and allowing district or regional Heritage rules to apply. The regulatory impact of this proposed change is likely to be quite minor as the number of scheduled archaeological sites in plantation forests is quite low.

5. Will the environmental risk assessment tools (the Erosion Susceptibility Classification, the Wilding Spread Risk Calculator, and the Fish Spawning Indicator) appropriately manage environmental effects as intended (see section 3.5 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...

6. Do you have any comments about any particular activity or draft rule (see appendix 3 of the consultation document)?



Please include reference to the rule you are referring to.

Please enter your comments here ...

7. Is the NES–PF the best option to meet the assessment criteria (in Box 13 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...

8. Have the expected costs and benefits of the NES-PF been adequately identified (see section 4.3 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...

9. Are there any issues that may affect the successful implementation of the NES-PF (such as decision-makers applying the permitted baseline test more frequently)?

Please provide comments to support your views.

Please enter your comments here ...

10. Please describe any risks or opportunities that you consider have not been identified or addressed in the proposal.

Please enter your comments here ...

11. Will the proposed NES-PF support regional councils to implement the NPS-FM (see section 6.1 of the consultation document)?

Please provide comments to support your views.

Please enter your comments here ...

12. What resources or other implementation activities would help you to prepare for and comply with the proposed NES-PF (see section 7 of the consultation document)? How should these activities be delivered (for example, training, online modules, guidance material)?



Please enter your comments here ...

13. Are there any other issues that you would like to raise?

Please enter your comments here ...

7 August 2015

Ministry for Primary Industries

P O Box 2526, WELLINGTON 6140

NES-PFConsultation@mpi.govt.nz

Attention: Stuart Miller, Spatial, Forestry & Land Management

Submission Form for the Proposed National Environmental Standard for Plantation Forestry

My Name: s 9(2)(a)

Postal Address: s 9(2)(a)

Phone: s 9(2)(a) Email: s 9(2)(a)

Privacy Issue I do not want my personal details made public

National Environmental Statement for Plantation Policy – Consultation Document June 2015

As an introduction, let me explain where I am coming from. The planet, and thus civilisation, face a number of uncertainties which are simultaneously approaching. These include increased extreme weather events, the end of cheap available fossil fuels, resource depletion, pollution, a 'pyramid' global near collapsing financial system, extreme inequality - to mention a few.

Elected representatives globally have been slow to act and it will be a case of 'too little too late'. With this lack of action, one of the few responses left is that of the global grassroots Transition Towns movement^{*1} - the building of local resilient communities. Parts of the NES-PF work in opposition to this response.

Aggravating that, is one of the biggest losses to civilisation - the loss of trust – loss of trust in elected representatives who are influenced by Corporations, money and votes of vested interests. The short term gain for a few is at the long term expense of communities.

Whilst there are good objectives in the Consultation Document, it is an attractive glossy colourful publication which could 'hide the wood from the trees'. Being a regulation, the minister can change regulation at will – and I believe the decisions on this Plantation Policy may have already been made. Witness how the Government set its climate change action policies recently on, ignoring the will of the people expressed in those public submissions received. By producing this attractive document, the Government can 'covertly' proceed under the guise that they have consulted the public. I believe this is one of the several changes this Government is pushing through to prepare for the corporate invasion of our sovereignty under the TPPA agreement.

My submission refers to both planting – and replanting and more specifically to the following sections:

Section 5.1 & 5.2

Simply put - Councils do not have to develop forestry specific rules in their plans as NES - PF will now prescribe these rules. The NES-PF will replace district and regional Council's existing plan rules for forestry. Where there is a conflict between existing council rules and NES-PF, then NES-PF rules will supersede the Council's rules.

The removal of the democratic wish of the community to include local precautionary GMO provisions in its local plan is strongly objected to. Whilst standardisation of rules NZ wide is understandable in a number of circumstances, local communities should be able retain some localised rules where the community has decided to do so.

This also appears to conflict with Page 5 of the Summary Consultation Document which heads 'Retaining Local Decision Making' due to unique environmental, social or cultural factors – does not the past local submissions fall within this description.

Section 6.4

Genetically modified organisms are regulated under HASNO Act 1996. The NES-PF will include a clause allowing GMOs as approved by Environmental Protection Agency under the HASNO Act.

Northland has previously consulted widely and received over whelming public support to include the precautionary principle for genetic modified organisms in its plans. Recently, the Environment Court has ruled that Councils have this ability to do so – albeit the ruling is now subject to an appeal.

The HASNO Act 1996 has several gaps. The Environmental Protection Agency does not have to abide by the precautionary principle. There is no liability for any releases that cause others harm. And to now add insult to this, the recent appointed head of EPA is a GMO advocate – a blatant conflict of interest.

I don't intend to include details of my concerns of GMOs as I am sure those will be detailed by those far more qualified in other submissions. Suffice to say, I consider there is growing evidence on the detrimental effects of GMOs that the global legally accepted precautionary provision should be included in all laws and regulations.

Section 6.1

National Policy Statement for Freshwater Management . NES-PF will support the NPS-FW and it is assumed that these standards will be sufficient to support objectives. I do not believe the present NPS-FW is sufficient to protect and return our waterways to their original condition. Silt run off occurring from forestry, especially at the time of milling, is a huge issue. This I have experienced with my own local Ngunguru River where run off controls have been insufficient and silt is building up. Shell fish have been dying in the Ngunguru Estuary and silt is one suspect that has been suggested.

Thank you

s 9(2)(a)

*1 Transition Towns – further information www.transitionnetwork.org

s. 9(2)(a)

From: s. 9(2)(a)
Sent: Sunday, 2 August 2015 6:13 p.m.
To: NES PF Consultation
Subject: Submission Form for the Proposed National Environmental Standard for Plantation Forestry

Submission Form for the Proposed National Environmental Standard for Plantation Forestry

Email to NES-PFConsultation@mpi.govt.nz OR

Post to : Stuart Miller, Spatial, Forestry & Land Management
Ministry for Primary Industries
P O Box 2526, WELLINGTON 6140

My Name s. 9(2)(a)

Postal Address s. 9(2)(a)

Phone s. 9(2)(a) Email

Privacy Issue I do / I do not want my personal details made public

In response to the MPI's proposed National Environmental Standard (NES) for Plantation Forestry, **does the group want to join the idiots who let Possums, Rabbits and PSA infected Kiwifruit pollen into New Zealand, by allowing genetically modified tree stocks in, without severe testing?**

I specifically refer to clause 5.2 "What the Changes will Mean for Existing Plans" which replaces existing council plan rules for forestry activities and allows the NES-PF to supersede these, along with clause 6.4 on page 43 "Hazardous Substances and New Organisms Act 1996" which allows for the introduction of GMO-trees throughout New Zealand.

Be very very careful.....

Signature ... s. 9(2)(a)

Submission Form for the Proposed National Environmental Standard for Plantation Forestry

NES-PFConsultation@mpi.govt.nz

Attention Stuart Miller

From s. 9(2)(a)

s. 9(2)(a)

ph s. 9(2)(a)

E. s. 9(2)(a)

Privacy Issue I do not want my personal details made public

In response to the MPI's proposed National Environmental Standard (NES) for Plantation Forestry, I would like to see the MPI take a strong precautionary approach to outdoor use of Genetically Modified Organisms by preventing the planting of Genetically Engineered tree stocks in either field trials or plant releases in New Zealand as has occurred with GMO rules/regulations from the Whangarei District Council, Auckland City, Far North District Council, the Northland Regional Council, and the Bay of Plenty councils.

I specifically refer to clause 5.2 “What the Changes will Mean for Existing Plans” which replaces existing council plan rules for forestry activities and allows the NES-PF to supersede these, along with clause 6.4 on page 43 “Hazardous Substances and New Organisms Act 1996” which allows for the introduction of GMO-trees throughout New Zealand.

These are my reasons:

- 5.2 Existing council plan rules for GMOs have come about through a great deal of public consultation, public meetings, hearings and public submission processes within the local authorities mentioned above. It is a process which has taken a number of years to come to fruition. This is democracy working properly for its citizens.

Replacing or superseding the local authority rules/regulations on GMOs by a nationwide environmental standard for forestry totally **negates** this democratic way in which our local government operates.

It denies us – the people of the area – our rights to speak out about subjects we have a concern about, and to be heard, understood, and to have our wishes properly considered and acted upon.

- 6.4 Introducing GMO-trees into New Zealand forests will set a dangerous precedent for other GMO-plantings. New Zealand is building up a good international reputation for GE-free foods and products. This clause 6.4 if it is allowed to stay in the National Environmental Standard for Plantation Forestry will **damage** New Zealand's good international GE-free reputation, and will be a massive cost in the future to our export markets.

I would like to see the clause 6.4 removed from this NES-PF, and all other references to it as in clauses 5.1 and 5.2 also be removed.

Thank you.

s. 9(2)(a)

From: s. 9(2)(a)
Sent: Wednesday, 15 July 2015 1:07 p.m.
To: NES PF Consultation
Subject: Fwd: thanks, can I look at this at the weekend. ?? Re: Confidential Important request Re: G.E.Trees

Topic : Submission to National Environmental Standards P-F.

From : s. 9(2)(a)
s. 9(2)(a)
Phone: s. 9(2)(a)
E-mail: s. 9(2)(a)

I have no personal gains to make from this submission.

Please withhold my personal details where submissions are made public. It is the content that counts: not who made it.

Please withhold my personal details in response to a request under the Official Information Act, 1982. This is about freedom of speech, and again, the content is what counts: not who made it .

National Environmental Standards.

The whole trend of this proposal and proposed legislation is to so twist and duplicate the responsibilities of two separate Ministries , and to intertwine these with H.S.N.O and the E.P.A. to such an extent that they can circumvent any local authority's power to have precautionary statements about G.E. This in spite of the Hon. N. Smith having affirmed that right in writing and in the media. This is devious and beneath the responsibility expected of Government Ministries. We in the North have an Environmental Court decision maintaining the right of the people to have local regulatory precautionary statements. This legislation will be going counter to that legal decision. It will therefore be unlawful.

Just over a month ago, the Environmental Court for New Zealand found in favour of the local Land and Soils and G.E. Free Northland (affiliated with G.E.Free Aotearoa) in a case against Federated Farmers who were challenging the jurisdictional right of local and district councils to form precautionary policies , statements and plans about genetically modified organisms.

Put simply, the finding was that H.S.N.O. and E.P.A. (E.R.M.A) are too broad to take into account regional climatic, geographical ,and soil and water differences. These are critical aspects that have to be fine- tuned to the needs of the regions and districts. This court finding gives us the moral and legal right to resist any attempts to over-ride our local G.E. Free policies.

The people of Northland (and other parts of N.Z.: Hawkes Bay, Bay of Plenty , and the Maori of Taitokerau and Tuhoe and other Iwi Authorities.) have claimed and worked to have the right to have no G.E. experiments or crops in their environment. Any doubts about this can be measured against the solidarity of Northland , which includes greater Auckland (A highly educated and informed area, and the most populous in N.Z.). These people cannot be dismissed as 'activists'. They have been working on this issue in a measured and organised and disciplined and intelligent and well-founded way since, and before, the turn of the century. They can see the problems that our government cannot , or will not, acknowledge.

In Northland, the regions and districts have joined together in to form the Inter-Council Working Party on Genetically Modified Organisms' Risk Evaluation and Management Options. I would have expected both Ministries to have taken this into account. Government of a country is about the wishes of the people...OF the people , BY the people, FOR the people and that is what has been happening in this region. It cannot be ignored.

Both of these Ministries and those responsible for overseeing H.S.N.O. and E.P.A. have displayed a total ignorance to the realities of G.E.: and their ignoring of scientific and documented findings on the poor and dangerous performance of G.E. organisms bears witness to the fact. Once in the environment, genetic micro-organisms can never be removed. If they turn out to be a biological hazard then there is no remedy . Our main markets , and the world opinion of people who eat food , is that they do not want G.E. in their foods. International forest regulations forbid trade in G.E. trees. Once we have G.E. trees in N.Z. there can be no way of checking as a result of cross pollination, short of D.N.A. testing of each tree, which trees are G.E. Free. The costs of that would be prohibitive. Our forestry trade would collapse.

Other countries, e.g. the U.K. have developed intelligent , renewable, forestry programmes that do not rely on short term profits but on varieties of useful timber trees farmed over long term. They have centuries of traditional knowledge that N.Z. could benefit from. This would be the sensible course rather than chasing , exploitative , destructive methods of tree farming being pushed by profit driven corporations that have no care or interest in the welfare of the N.Z. people or their ecology or their economy or their environment. All of these are the responsibility and the duty of care of the New Zealand Government.

Consider how many environmental regulations and laws have already been changed to suit the profit driven aims of overseas corporations. We , the people, have been keeping tally. We are not happy. Our environment our livelihoods our societies, our communities , our self government are under threat. We live in the environment. Members of Parliament are insulated from the real world, BUT, they too need to eat. You cannot eat dollar notes, drink dollars or shelter under them. These necessities come from the land which is already in very poor heart through extraction industries such as dairying and pine tree forests: and their concomitant use of fertilisers and weedkillers and pesticides: not to mention their production of effluent fouling the waterways; and the resultant erosion and silting and flooding from tree removal. Our natural bush causes rainfall . (Scientific fact. Look it up in Google " Trees and Drought" . Locally the only bush clad hill gets rain and mist when the surrounding area does not. This is observation over many years.) Trees retain water in the soil which makes it available for other plants and rainfall through evaporation. Our recent droughts are being caused by tree removal. Trees protect the soil as well as the farm animals. Pines are not healthy for the soil. G.E. pines are neither safe nor healthy. They are a recipe for disaster.

Quite simply, G.E. is still experimental. New discoveries about the genome are being made every day. With genetically engineered organisms we enter an unknown that could put not just the economy of the country at risk but destroy the environment, and for this there is no remedy, no going back. The die is cast : just like gorse and possums but worse. The world is already too short of living space and uncontaminated farmland to take this kind of risk. This is not just a regional or national issue, it has international repercussions.

Meanwhile the discoveries and achievements of natural genetics are out- performing all the G.E. ventures. This information is also very well documented and are without dangerous environmental threats and costs .

If G.E. products are so good, why are the companies promoting them resisting efforts to have G.E. content on all food labels? They are actually suing states in the U.S.A. that want this labelling. Firms in N.Z. are voluntarily labelling goods G.E.Free because it sells .

There is no case for any planting of G.E.trees and all parts relating to this possibility should be removed from the power of the National Environmental Standards - P.F. to over-ride local regulations.

Meanwhile there should be a moratorium on all G.E. planting and experiments in Northland and the rest of N.Z.. G.E. is still at the closed laboratory experimental stage.

The corporations pushing for this do not live here. We and the and government bureaucrats and politicians do.

Signed: s. 9(2)(a) .

Submission Form for the Proposed National Environmental Standard for Plantation Forestry

Email to NES-PFConsultation@mpi.govt.nz OR
Post to : Stuart Miller, Spatial, Forestry & Land Management
Ministry for Primary Industries
P O Box 2526, WELLINGTON 6140

My Name .. s. 9(2)(a)
Postal Address .. s. 9(2)(a)
Phone s. 9(2)(a) Email s. 9(2)(a)

Privacy Issue ~~I do~~ / I do not want my personal details made public

In response to the MPI's proposed National Environmental Standard (NES) for Plantation Forestry, I would like to see a sustainable plantation forest sector that protects our indigenous vegetation and habitations, provides food and shelter for native birds, protects our soils from erosion, and our waterways and estuaries from saltation.

I would also like to see the MPI take a precautionary approach to outdoor use of Genetically Modified Organisms by preventing the planting of Genetically Engineered tree stocks in either field trials or plant releases.

I specifically refer to NES-PF 6.4 pages 43 of the consultation document, 64 and 82.

These are my reasons:

The proposal, NES-PF 6.4, overrules the
aims of Councils in the north, achieved through
a democratic process, to keep the region G.E free.
And, thereby denies Northlanders the
right to manage what occurs, with regard
to land use, within their district.

Signature .. s. 9(2)(a)

Submission Form for the Proposed National Environmental Standard for Plantation Forestry

Email to NES-PFConsultation@mpi.govt.nz OR

Post to : Stuart Miller, Spatial, Forestry & Land Management
Ministry for Primary Industries
P O Box 2526, WELLINGTON 6140

s. 9(2)(a)
My Name . s. 9(2)(a)
Postal Address: s. 9(2)(a) s. 9(2)(a)
Phone Email

Privacy Issue ~~I do~~ / I do not want my personal details made public

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I specifically refer to NES-PF 6.4 pages 43 of the consultation document, 64 and 82.

These are my reasons:

I am very concerned that both local and regional councils will not have a say. Northland is GMO free and now you can over-ride this. Not happy

s. 9(2)(a)
Signature

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I would also like to see the MPI take a precautionary approach to outdoor use of Genetically Modified Organisms by preventing the planting of Genetically Engineered tree stocks in either field trials or plant releases.

I specifically refer to NES-PF 6.4 pages 43 of the consultation document, 64 and 82.

These are my reasons:

(council)
Northland District are G.E
free, so follow their example.
This is not the right way of going
about introduction of new
technology or innovations.

s. 9(2)(a)

Signature

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My Name ...s. 9(2)(a)

Postal Address ...s. 9(2)(a)

Privacy Issue I **do not** want my personal details made public

In response to the MPI's proposed National Environmental Standard (NES) for Plantation Forestry, I make the following comments:

The proposed NES PF is a back door effort by the Government to introduce GMO trees into the Northland environment. The Northland and Auckland Councils have agreed on a precautionary approach to GMOs. This cannot be overruled by Central Government.

At a time when it is harder than ever for our exporters to thrive, why would we give our GE free status away and lose our competitive edge? Why does our Government want to sabotage our GE free status and our clean green image? It makes no sense.

I am disgusted by this bully boy undemocratic behaviour.

I am a farmer. I farm in a sustainable manner with regard for future generations. GMO trees will destroy the environment and future generations will pay the price. We cannot let this happen.

I have no faith in the EPA (previously ERMA) to make decisions on GMOs due to their past record in not properly monitoring field trials and allowing plants to go to seed.

The Standard does not take into account the dangers and liabilities associated with GMOs. It also does not address potential for contamination of soils, flora and fauna etc.

I would like local Councils to manage land uses at a regional and district level through their mandated planning functions under the RMA.

Relief sought:

I ask that you remove all wording referring to genetically modified trees and rootstock from the NES-PF (i.e. NES-PF 6.4, P43, 64 & 82). I object to MPI's proposed section 6.4 and want it removed from the new NES for plantation forestry. The proposal seeks to remove NZ councils' precautionary and prohibitive GE policies. These must be retained. Local councils have the right (and obligation) to prevent outdoor GE tree experiments and GE tree releases (using the RMA).

Signatures. 9(2)(a)

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Email to NES-PFConsultation@mpi.govt.nz OR

Post to : Stuart Miller, Spatial, Forestry & Land Management
Ministry for Primary Industries
P O Box 2526, WELLINGTON 6140

From: s. 9(2)(a)

Ph. : s. 9(2)(a)

Email: s. 9(2)(a)

Privacy Issue: I do not want my personal details made public

In response to the MPI's proposed National Environmental Standard (NES) for Plantation Forestry, I would like to see the MPI take a strong precautionary approach to outdoor use of Genetically Modified Organisms by preventing the planting of Genetically Engineered tree stocks in either field trials or plant releases in New Zealand.

I specifically refer to clause 5.2 "What the Changes will Mean for Existing Plans" which replaces existing council plan rules for forestry activities and allows the NES-PF to supersede these, along with clause 6.4 on page 43 "Hazardous Substances and New Organisms Act 1996" which allows for the introduction of GMO-trees throughout New Zealand.

These are my reasons:

I am disgusted that a government that claims to head a democratic country repeatedly and blatantly ignores the democratic process and the voice of its people.

If you want to change the existing rules regarding GMO trees for New Zealand, do so through the proper channels and put it out to public consultation.

So that we all get to have a say! It is OUR country, not just yours.

For my part I have to say that we cannot muck around with one aspect of the natural cycle and expect everything else to remain the same. The past has shown that every interference, even with natural means as in bringing in a new predator to combat a pest, has far reaching and unexpected consequences.

We do know what is possible with GMO: Insect killing trees for example. If we killed off all our bees, how would that impact our fruit industry? Or Manuka honey?

Even if all the mutations are designed with all the right outcomes in mind, who will guarantee that there will be no mistake and that nature will not mutate further?

I am also concerned about the fact that it is inevitable that GMO, sooner or later, will end up in the food chain. What is known about the effects of genetically modified foods on the human body? Why don't food producers shout about the benefits of their GM products? It is only the opponents who make a big deal out of the fact that their produce is GMO free.

I think we know far too little about the long term effects of GMO to be so careless to just allow politicians to say yay or nay to their use.

We are supposedly a clean and green country. How could we continue to use the tag line 'Naturally New Zealand'? This is what makes us different from the rest of the world. Let's not ruin it.


We did it with nuclear power and the world looks up to us. Especially at a time when many countries are trying to deal with the long term effects of nuclear waste storage, ageing power stations and poisoned countryside.

Let's be just as intelligent when it comes to GMO!

s. 9(2)(a)

Signature

.....



10 August 2015

(I DO NOT WANT MY PERSONAL DETAILS MADE PUBLIC)

Stuart Miller,
Spatial, Forestry & Land Management
Ministry for Primary Industries
P O Box 2526,
WELLINGTON 6140

SUBMISSION FOR PROPOSED NATIONAL ENVIRONMENTAL STANDARD for PLANTATION FORESTRY

In response to the MPI's proposed National Environmental Standard for Plantation Forestry, I would like to see a sustainable plantation forest sector that protects our indigenous vegetation and habitations, provides food and shelter for native birds, saves our soils from erosion, and keeps our waterways and estuaries clean.


This means that I **oppose** the proposed Standard – **NES & other relevant legislation: 6.4 – Genetically modified tree/root stock** (p.43, Appendix 3; Afforestation p.64; & Replanting, p.82).

These are my reasons:

Here in Northland much work has gone into educating the public about GMO's during the past ten years – a public that now has our Councils – the Whangarei District, the Far North District and the Northland Regional Council agreeing to apply a precautionary approach to GMO. This cannot be overruled by generally allowing the planting of GMO-trees in local forests.

Please do not disenfranchise the public by overriding Local & District Council policies.

I would like to see the **MPI take a precautionary approach to using GMO's** by banning genetically engineered tree stocks in field trials and plant releases. Let us keep our country with an economic competitive edge by staying GMO free and offering GMO free produce to our trading partners.



Rachel Astruc

From: s 6(b)(i), s s 6(b)(i), s 6(a)
Sent: Tuesday, 11 August 2015 3:01 p.m.
To: NES PF Consultation
Subject: Submission on proposed NES-PF

Attention: Stuart Miller

My name is s 6(b)(i), s 6(a)

My address is s 6(b)(i), s 6(a)

My phone number is s 6(b)(i), s

My email address is s 6(b)(i), s 6(a)

Privacy Issue: I do not want my personal details made public.

Re: Proposed National Environmental Standard for Plantation Forestry (NES-PF)

I oppose the proposed standard NES-PF 6.4 Genetically modified tree/root stock (p. 43, Appendix 3, Afforestation, p. 64 and replanting, p.82).

Reasons for My Opposition:

This Standard goes against the wishes of the people of Northland, and the democratically elected Regional and District Councils who have carried out their wishes, to be able to have a say in the use or otherwise of Genetically Modified Organisms (GMO) in Northland. It is farcical for the years of good work by councils with a clear mandate to be over-ridden by the whim of a National body with no clear mandate.

National Environmental Standards are supposed to be minimum acceptable standards for protecting the environment. There is no explanation of how the proposed standard (6.4) is supposed to protect the environment. It is irrelevant.

Signed: s 6(b)(i), s 6(a)