

External Review of Submissions to MAF on How " Conditional Release " May Assist in Achieving Coexistence of Gm and Non- Gm Crops

1.Approach

I received from MAF the following documents :

MAF's database of submissions

All submissions

MAF's database of key points and main topics raised

MAF's summary of submissions

In order to compare my analysis with that of MAF I read a random sample of 1 in 4 of the shorter submissions (less than 5 pages) and 1 in 3 of the longer submissions (5 pages or more) a total of 28 % of all submissions

. NB The page length was inclusive of accompanying reference material from other sources .

2.1 Consultation process

The analytical process, whereby MAF officials read each submission and sorted the key points and topics raised into a database and then summarised the major issues did, in general, fairly and accurately represent the views of the submitters .

The bulk of the complaints about inadequate time given for consultation (6 out of 11) appeared to have arisen from a breakdown of communications in Northland . If we exclude the Northland data, 95 % of submitters did not mention the issue.

2.2 Practicality of coexistence

The report correctly identifies that the difference between those who think coexistence is impossible and those who think it is possible is strongly related to the level of contamination which is acceptable . It would be worth emphasising in the report that the two "sides " agree that the prevention of some degree of contamination in non-GM crops appears to be impossible .

The statement that " three submitters called for regional exclusion zones to be established in their areas " underestimates the strength of opinion on this topic . Local Councils in Marlborough , Horowhenua and Nelson have specific proposals ,while Kapiti have also discussed the topic . But a diverse range of other organisations want the issue further explored . These include Vegfed , Organic Product Exporters of New Zealand , GE Free Northland , Forest and Bird ,Northland , GE Free Nelson and the New Zealand Plant Breeders Research Association who suggest the use of "specific locations " for GM crops . The Hort Research CRI , Wrightsons and Fonterra emphasise the need to consult locally

2.3 Maori issues

No comment

3 .Industry code of practice for separation distances between GM and non-GM crops

3.1 General comments

Refer to discussion in 2.2 above .

3.2 Could the code be based on the current certified seed production code ?

Significant comments by Vegfed and the Life Sciences network on the lack of incentive for GM growers to participate in the voluntary seed certification scheme should be included .

3.3 Would a register of plantings need to be maintained ?

No comment

3.4 Who will ensure compliance ?

This point should be clarified by putting in the numbers . For example" of 25 submitters 18 suggested that MAF would be an appropriate agency for auditing while 7 questioned etc "

3.5 Who would pay ?

No comment

3.6 Should compliance under conditional release be mandatory , but voluntary where there is unconditional release ?

No comment

4. NATION-WIDE NETWORKS FOR FACILITATING COEXISTENCE AND REQUIREMENTS FOR A MEDIATION SERVICE

General comment

Given that only 5 % or less of submitters appeared to have contributed to this issue the amount of space given to it in the report is excessive .

Specifically in section 4.4 What are the requirements for a mediation service ?

The statement "a range of views " does not accurately reflect the comments where only 8 out of 12 offered lukewarm support, and 4 were against a new service being set up for a variety of reasons as discussed in the report .

5.What GM crops is New Zealand most likely to grow and when ?

I have no comment on this section except to point out the comments of Dunbier and associates *. They state that " much of the current \$12.2 million annual import of vegetable seed would cease , either because it could not meet the zero threshold (for adventitious GM content of seed) or because the cost of complying could not be justified " This has obvious implications for what crops are likely to be grown in New Zealand .

*Although these comments were made in their submission to MfE on amendments to the HSNO Act they are very relevant to section 5 above .

CONCLUSION

I can confirm that in general the MAF summary of submissions accurately reflects the views of the submitters. Most of my comments reflect a need for a little more precision in some of the statements by the provision of numbers .

The issue of "regional exclusion zones " is largely a matter of according a greater emphasis to the views expressed by a number of submitters .

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