



GE Free New Zealand

PO Box 13402, Wellington, Aotearoa | NZ
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15 June 2026

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Re: Agricultural Compounds and Veterinary Medicines Amendment Bill

Tēnā koutou katoa

I oppose any agricultural product that contains products made from new genomic techniques.

1. We oppose new section 20A Recognition of overseas regulators for purposes of section 20(aa).

New Zealand is a sovereign country and no other country has the criteria for special cultural conditions that consider Māori under Te Tiriti o Waitangi. The legislation regarding genomic techniques are very different in overseas countries so approvals in these jurisdictions would be made on different objectives to New Zealand. This then makes consultation with a person in another overseas jurisdiction void 20(aa) (1)

The OECD published a report Considerations for the Human Health Risk Assessment of Externally Applied dsRNA- Based Pesticides Series on Pesticides No. 110.¹

260 Special attention will need to be paid by registrants to how the changes to the naked form of the dsRNA (e.g., chemical modifications to component nucleosides, nanocarriers, covalent additions of carrier molecules, or the addition of penetration-enhancing co-formulants) could affect (1) environmental persistence, mobility and distribution, and hence, potential human exposure; and (2) the systemic uptake of the dsRNA active constituent in exposed humans. Thus, data and/or studies on the possible impact on environmental persistence and on systemic uptake and toxicity that a specific dsRNA formulation presents are necessary to characterise the risks that could possibly arise from exposure to that formulation.

These dangers need to have defined and specified sections identified in the ACVM Act with described guidelines for expert evaluation and should not be left to overseas harmonisation for approvals that would undermine New Zealand's special nature.

2. We oppose and seek clarification regarding the ambiguity of new section 21A and its counterpart 35AAD (3)(a)(b) when deciding an approval appears to have a double meaning that means a genetically modified organism can be used as an active ingredient in a Trade Name Product if approved by the EPA.
(3) However, the Director-General must not grant the application if—

¹https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/08/considerations-for-the-human-health-risk-assessment-of-externally-applied-dsrna-based-pesticides_29cd67bc/54852048-en.pdf

*(a) the agricultural compound is also a hazardous substance or new organism; and
(b) an approval for that substance or organism has not been issued under the Hazardous Substances and New Organisms Act 1996.*

This ambiguity has serious implications on New Zealand's GE Free status and the effect on the soil and other organisms that come into contact with the pesticide. The Australian Fire ant Eradication body has found regarding the use of Fire ant pesticide that was genetically modified was not suitable for use on organic farms.² It was the formulation adjuvants not the active ingredient that were derived from GM products. All applicant must declare the source of their active ingredients and adjuvants.

The sections in the HSNO Amendment Act referring to Authority discretion on a tiered basis allows low risk GM new organisms to be fast tracked without the requisite public notification, this then allows certain GM organisms to escape regulation and be used in agricultural compounds without any labelling or risk evaluation.

Ngā mihi,

Jon Muller
Secretary GE Free NZ in Food and Environment

Cc:
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² <https://www.fireants.org.au/about-us/news-and-events/news/treatment-organic-property>