GE Free New Zealand

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15 June 2026

Re: Hazardous Substances and New Organisms Amendment Bill

Tēnā koutou katoa

We would like to be heard.

We support the submissions made by OANZ, PSGRNZ.

We support maintaining the HSNO Act clauses 4-8 without amendments. This will ensure that the Precautionary Principle and the principles embodied by the Treaty of Waitangi, continue to be the fundamental purpose of environmental, economic, indigenous and community protections.

We also support the amendments that allow clarification and future-proofing of hazardous substances. We do not support any hazardous substance that is derived from genetically engineered/modified organisms or RNA interference pesticides such as the dsRNA insecticides Calantha and Norroa.

We do, however, **reject** the unclear and ambiguous changes around "new organisms" and how they will impact on new biotechnologies in relation to gene edited /drive organisms, genetically modified organisms (GMOs) and any future organisms that have been modified with *in vitro* techniques.

We have been told that the HSNO Amendment Bill is designed to "modernise and streamline" the HSNO system. However, it is apparent that the proposed changes will speed up GMO releases, remove explicit guidance, narrow GE-free protections, loosen up definitions, and increase the Authority's power to exempt GMOs, whilst cutting out public process and liability rules. This creates new vulnerabilities and real risks to human and animal health, the environment, the economy and our excellent international reputation for high quality foods.

In the so-called streamlining of the legislation from regulatory directives, the removal of vital regulations for the assessment of all hazardous substances and new organisms to Authority weakens vital protections for New Zealand.

The EPA and ERMA approved the conducting of field tests under IAG approvals since 1988[1] and generic multi species field tests and developments outdoors since 1998 (*Allium* species,[2] *Brassica* species,[3] Tree species[4], Animal species[5]). The animal field tests and outdoor developments are summarised in the two documents "GE

[1] https://www.epa.govt.nz/assets/Uploads/Documents/New-Organisms/Reports/948c299cae/is-GMOs-prior-1998-IAG-pdf.pdf

[2] https://www.epa.govt.nz/database-search/hsno-application-register/view/GMF03001/

[3] https://www.epa.govt.nz/database-search/hsno-application-register/view/GMF06001/

[4] https://www.epa.govt.nz/database-search/hsno-application-register/view/GMF99005/

[5] https://www.epa.govt.nz/database-search/hsno-application-register/view/ERMA200223/
https://www.epa.govt.nz/database-search/hsno-application-register/view/GMD02028/
https://www.epa.govt.nz/database-search/hsno-application-register/view/GMF98009/

Animals in New Zealand: the first fifteen years" [6] and "GE Animals in New Zealand: 2010 -2025."[7] Field Test research, carried out and recorded by the New Zealand Crown Research Institutes scientific sector, documented and identified the failures of the GM experiments. The Law does not need changing in order to accommodate the clear lack of success, commercial or biological, that GMO trials have had in New Zealand.

This Bill sets up pathways for release of GMOs through rapid assessment and a structure based on a number of different tiers. These have not been identified. Rapid assessment is proposed to facilitate GMO release. This will occur without proper consideration of the significant risk effects, both known and unknown, to human and animal health, the environment, the economy, and the inevitable loss of GE Free farming.

Whole segments of the proposed amendments on how the regulator/EPA will assess releases of so-called "vagrant" organisms, appear to have been given a fast track for release. Changes to the definitions of different classes of GM organisms make it difficult to know what will and won't be regulated under different amendments.

The Bill also allows consideration and approval of GMOs released in the US, Canada and Australia to be rubber stamped in New Zealand, by fast tracking conditional release and full release approvals. This calls in to question what criteria and who decides recognition? By relying on international regulators there is no recognition of Te Tiriti o Waitangi on the flora and fauna, nor the effects on our ecosystems, including climate, soils, land area and land uses, which are vastly different from those in these other countries.

The GE-Free export premiums and point of difference that consumers seek from New Zealand grown food would be completely lost. The New Zealand Institute of Economic Research (NZIER)report on the Potential costs of regulatory changes for gene technology[8] estimated a loss in demand of between $10-$20 Billion. This is likely to devastate our export earning capacity.

The negative impact on the economic objective to 'double exports in 10 years' would not meet the growing global market for non-GMO products. The non-GMO market is projected to grow to US$2624 by 2034, as forecast in the Fortune Business insight. The opportunity cost of losing New Zealand's leading GE Free position, is unacceptable. [9]

The HSNO Act amendment Bill is a complex web of changes that threatens to do what the stalled Gene Technology Bill also threatens to do, which is to deregulate GE organisms.

In its current form, this Bill cannot be allowed to stand. The government departments involved in its drafting are proposing allowances that will inevitably cause serious harm to our country, by weakening the environmental protections that have, until now, made us a nation with an excellent reputation for high quality, GE-free produce.

1. **We are concerned** over the lack of information on definitions and terminology, namely – vagrants, denewed organism, low risk, levies and tiers

   The term "vagrants" is not clearly defined. Exactly what is considered a "vagrant"? The ability to fast track them to the outdoor release stage is of concern with respect to laboratory approvals for pest species, e.g. possums, that have been genetically modified or gene edited. Are they considered as an introduced species in New Zealand?

   In granting an approval for a new organism in containment deemed to be a "vagrant", the Authority must consider any actual or potential adverse effects of the progeny and descendants, as specified in amendment 43(2).

   43 (2) If the application is for approval to develop a new organism in containment that is specified in Schedule 2 and that the Authority considers to be ***a*** **vagrant**, *the Authority must also have regard to*

[6] https://www.gefree.org.nz/assets/pdf/GE-Animals-in-New-Zealand.pdf

[7] https://www.gefree.org.nz/assets/Uploads/GE-Animals-in-NZ-Part-2-FIN-WEB.pdf

[8] https://drive.google.com/file/d/17fC5qTDVscJBfuKGIG1oopjnXI0oib1b/view

[9] https://www.fortunebusinessinsights.com/non-gmo-food-market-106359

any adverse effects of the development of the organism and of any of its offspring, progeny, or descendants

The only interpretation is in the repealed Vagrant Act 1882?[10] This historical Act defined vagrants as "Idle and disorderly persons, rogues and vagabonds who could serve prison terms."

There is no information or clarity to provide submitters or the Select Committee the guidance details if approvals are granted for pest species such as possums, wasps and plants that exist and have been approved for indoor GM development. As certain Schedule 2 organisms exist in containment in New Zealand would these amendments allow them to be considered as "vagrant" as they are already in New Zealand and allow fast track, outdoor development experimental tests?

The term ″denewed organism″ appears nowhere in international regulatory, scientific, or biosafety law. This term has no definition and therefore legislatively invalid as there is no guidance as to its meaning.

25(c) *In this section, denewed organism mean an organism that is prescribed as not a new organism in regulations made under section 140(1)(c) or a notice made under Part 5A.*

This allows EPANZ to make a decision on whether to "denew" genetically modified organisms and new genomic techniques (NGT) as non-GMO. This is in contradiction to the High Court determination on gene editing techniques non-GM status.[11] in 2014. The case was taken by the Sustainability Council of New Zealand Trust to the EPA. The High Court ruled that the HSNO Act legislation governed the use of gene editing and all new genomic techniques are not exempted techniques as specified in HSNO reg 3(1)(b).[12] The HSNO Act 1996 defines a GMO as -

Interpretation 2

genetically modified organism *means, unless expressly provided otherwise by regulations, any organism in which any of the genes or other genetic material—*

(a)have been modified by in vitro techniques; or

(b) are inherited or otherwise derived, through any number of replications, from any genes or other genetic material which has been modified by in vitro techniques.

This is described fully in the PSGR submission at section 7.

Recommendation: Define Vagrants, tiers, denewed organism and low risk, in the Interpretation 2, 2A.

2. **We oppose the removal** of the protections around the clean-up of field tests. The deletion of the full interpretation of field test as set out in the HSNO Act 1996 is as follows:

2 (1) **field test** *means, in relation to an organism, the carrying on of trials on the effects of the organism under conditions similar to those of the environment into which the organism is likely to be released, but from which the organism, or any heritable material arising from it, could be retrieved or destroyed at the end of the trials.*

The removal of the field test requirement "*but from which the organism, or any heritable material arising from it, could be retrieved or destroyed at the end of the trials*" could result in contamination with viable genetically modified material, e.g. pollen, seeds and vegetative plant parts. This would inevitably lead to the growth and

[10] https://www.legislation.govt.nz/act/public/1882/9/en/latest/#LMS1408044

[11] https://geiringer.law/wp-content/uploads/2019/10/The-Sustainability-Council-of-New-Zealand-v-The-EPA-2014-NZHC-1067.pdf

[12] https://www.legislation.govt.nz/secondary-legislation/pco-drafted/1998/219/en/latest/#DLM255883

escape of volunteer GM plants into the wider environment. Such an area would become a contaminated site, posing potential risks and hazards to the environment and also potentially to human and animal health.

There is an inference that these tests could be conducted as "developments outdoors" in conditions similar to a field test, but with no environmental controls or testing required. This occurred in the GMD02028 trial, which subsequently became ERMA200223, a continuation of outdoor development.

However, as has been documented in past field trials, there is a strong possibility that these adverse effects could persist in the soil, or the surrounding environment, after the trial is finished and form self-sustaining populations, displace valued species and/or have adverse effects on the safety of humans and habitats. Problems would be likely to persist unless the site was thoroughly cleaned up.

Recommendation: Retain the original HSNO interpretation of Field Test with no amendments.

3. **We oppose** the amendment to 25(1B) and 25©

> *25 (1B)the following departments or their agents may isolate, aggregate, multiply, breed, propagate, grow, raise, or otherwise use a new organism for the purpose of identifying, managing, or eradicating that organism:*
> *(a) the department responsible for administering the Biosecurity Act 1993:*
> *(b) any departments that are recognised by the responsible Minister under section 101(2) of that Act.*

This would give the Minister power to override the EPA and approve the import, manufacture, development, field testing, or release of a genetically modified pest.

Recommendation: The Minister must not have the power to interfere with the approval process for any applications to field test new GM organisms as stated in 25 (1B)(b). The same would go for applications for conditional and full release of new GMOs. The public must be notified prior to any test or release in their region.

4. **Partial support for Amendment 28A (3)**.

> 28A (3) *The Authority must not approve a hazardous substance under this section solely because it is satisfied of the matter in subsection (2)(ab) if it considers that the application, if approved, will result in—*
> *(a) significant cultural, economic, environmental, ethical, or health effects in or for New Zealand; or*
> *(b) significant effects for New Zealand's international obligations; or*
> *(c) significant effects in an area in which the Authority lacks sufficient knowledge or expertise.*

We oppose the emerging hazardous substances formulations that include the addition of genetically engineered constructs (RNA, dsRNA) like RNA interference pesticides. These would have significant cultural, economic, ethical and environmental effects for New Zealand's international obligations. In addition, the authority would lack sufficient knowledge and expertise to assess such constructs, as these products are still in development and the short- and long-term effects of them are as yet untested. This new vulnerability must not be introduced into the system.

Recommendation: We partially support the amendment to sec:28A, if it does **not** include genetically modified, gene edited, gene drive, products from new biotechnologies.

5. **We oppose Tiers for Assessments on new organisms for outdoor tests:**

The HSNO Amendment Bill clearly states that the Authority has been enabled to prescribe new GM organisms as "not new organisms" by notice, instead of being prescribed in regulations.

Appendix 2: Regulation 3 of Hazardous Substances and New Organisms (Organisms Not Genetically Modified) Regulations 1998

3 (1)(d) organisms modified solely by–

(i) the movement of nucleic acids using physiological processes, including conjugation, transduction, and transformation; and

(ii) plasmid loss or spontaneous deletion:

(e) organisms resulting from spontaneous deletions, rearrangements, and amplifications within a single genome, including its extrachromosomal elements. (MfE, 2025)[13]

(2) Despite anything in subclause (1)(d), if nucleic acid molecules produced using in vitro manipulation are transferred using any of the techniques referred to in subparagraph (i) or subparagraph (ii) of subclause (1)(d), the resulting organism is a genetically modified organism for the purposes of the Act.

Many of the new sections mention forms and regulations. The Regulations available do not reflect the changes that the HSNO Amendment Bill is making. The Bill also mentions approvals of tiers of different classes, but the tiers are not specified in Regulations or Schedule 2.

The Bill's explanatory note explains the way to achieve its policy objectives is to require certain information to accompany applications "*specify different classes or tiers of application, including classes or tiers that are based on risk and complexity*."

This supports the reasoning that there will be a genetically modified tier insertion into Regulations and/or Schedule 2 that allows the Authority to make a discretionary judgement, on the consideration as to whether to publicly notify GM applications if there is likely to be significant public interest in the applications. There is significant public interest and awareness over the issue of Genetic Modification/Gene Editing/New Biotechnologies and there must be directives as to what type of discretion is used. The social license for decision making requires the public are not excluded by the system. The Bill amendments remove our international obligations under the Aarhus Convention that are integral to the inclusion of civil society.

Public Participation in Decisions on the Deliberate Release Into The Environment and Placing on the Market of Genetically Modified Organisms

1. In accordance with the modalities laid down in annex I bis, each Party shall provide for early and effective information and public participation prior to making decisions on whether to permit the deliberate release into the environment and placing on the market of genetically modified organisms. [14]

As signatories to the Cartegena Protocol, this has implications for HSNO approvals as set out in HSNO amendments in sections 42, 42A.

Section 42 amended (Rapid assessment of adverse effects for development of genetically modified organisms)

section 42(1) with:

(1) The Authority may make a rapid assessment of the adverse effects of developing a genetically modified organism in containment if an application under section 40 to develop the organism in containment requests that the Authority make a rapid assessment under this section of those effects.

[13] https://www.legislation.govt.nz/secondary-legislation/pco-drafted/1998/219/en/latest/#DLM255886

[14] https://unece.org/DAM/env/documents/2005/pp/ece/ece.mp.pp.2005.2.add.2.e.pdf

Section 42A amended (Rapid assessment of projects for low-risk genetic modification)

Amendment 42(1) implies that GM applications be defined on a tiered structure in the Regulation or Schedules?

The explanatory note states that a tier of so-called low risk genetically modified organisms will be inserted into Regulations or Schedule 2 in *relation required to accompany applications, which may vary between different classes or tiers of application, including classes or tiers that are based on risk and complexity.* The Bill lacks transparency and should have identified the tier types of GMO additions in schedule 2 so the public and expert submitters can have a chance to respond.

Advocacy group Beyond GM, the UK's leading independent voice on genetic technologies in food, farming and environment successfully challenged the right for a judicial review of the Precision Breeding Act Regulations, in the High Court.

The UK government's Precision Breeding Bill was revealed to be compromised and rushed. It was justified to have concerns that the Regulatory framework for Precision Bred Organisms (PBOs) that include genetically engineered/modified organisms would undermine transparency, traceability and environmental protection. [15]

Recommendation: Halt the HSNO Amendment Bill until the Regulations and Schedule 2 have been updated to inform public submitters how the tiers will be defined, and further submissions allowed and considered.

6. **Clarification on New Organisms in Containment**

Section 43 amended (Additional matters to be considered when application made for developing new organisms in containment)

In section 43

(2) If the application is for approval to develop a new organism in containment that is specified in Schedule 2 and that the Authority considers to be a vagrant, the Authority must also have regard to any adverse effects of the development of the organism and of any of its offspring, progeny, or descendants.

Section 44 amended (Additional matters to be considered on applications for importing and field testing of organisms)

*(1)**(c)** the ability of any heritable material arising from the organism to escape from containment if it is a genetically modified organism.*

Recommendation: We oppose the possibility that an experimental trial outdoors could be included in section 43 as not being of public interest. We propose new wording to say "indoor containment" or "a containment structure."

7. **Oppose any omission on Public notification of import for release applications**.

Applications, etc, relating to new organisms

38A (1) (b) an application under section 34 to import for release, or ***to release from containment****, any new organism, but only if the application has not been approved under section 35 or 38I:*

(2) *As soon as practicable after receiving the application or making the decision,—*
(a) the Authority must consider whether there is likely to be significant public interest in the application or decision; and

[15] https://beyond-gm.org/wp-content/uploads/2026/06/Beyond-GM-Approved-Judgment-04-06-2026.pdf

(b) if the Authority considers that there is likely to be significant public interest in the relevant application or decision, it must publicly notify it.

38AAC Notification of release in accordance with section 38 approval

(1) This section applies to an approval to import a new organism for release, or to release a new organism from containment, that is granted under section 38.

(2) A person who releases an organism in accordance with the approval must notify the Authority within 1 month after the date of release.

(3) A person is not required to notify the Authority under this section if the Authority waives the requirement for notification.

A major concern for farmers, businesses, and consumers is the release of GMOs, particularly if they have not been notified in advance. It has been recognised that once released, GMOs are not able to be contained. This was documented in 2001 in the guide to the HSNO Act (2001), which clearly states that:

> *"The HSNO controls on new organisms apply only to new organisms in containment because when organisms are released, they reproduce and so cannot be controlled. The matters that can be covered by controls on new organisms in containment are listed in the Third Schedule (part 1) to the HSNO Act." (MfE, 2001)* [16]

The term new organism includes a *"genetically modified organism (HSNO 2A (1)(d).*

Submitters to the Gene Technology Bill in 2025 confirmed the scientific and anecdotal evidence that GE could not be contained. Raising concerns over "cross-industry effects" from GE pollen drift.[17]

Recommendation: Halt the process until the regulations and forms have been written, so a proper evaluation can be submitted on.

8. Civil Liability Conditions for full Release

We support HSNO Act Civil Liability sec:124 G

124 Civil liability

(1) A person is liable in damages for any loss or damage caused by any act or omission of the person while—

(a) *developing, field testing, importing, or releasing a new organism in breach of this Act; or*

(b) possessing or disposing of any new organism imported, developed, or released in breach of this Act; or

(c) failing to comply with any controls relating to a new organism—

(i) imposed by any approval granted under this Act; or

(ii) specified in any regulations made under this Act.

(2) A person is liable under subsection (1) whether or not—

(a) the person intended the act, omission, or breach; or

(b) the person was taking reasonable care when the act, omission, or breach occurred.

A matter of great concern is contamination caused by genetic trespass. This will affect the seed supply, organic and regenerative farmers, and farmers who want to stay GE Free for their economic livelihoods.

[16] https://environment.govt.nz/assets/Publications/Files/guide-to-hsno-act-jul01.pdf

[17] https://www.agresearch.co.nz/news/submission-on-gene-technology-bill/

We request that you ensure that complete protections are in place for these farmers and to this end add a clause at 124G (3) relating to Full Release without controls that says

(3) A person is liable to pay damages for any economic, environmental or livelihood loss or damage caused by the person/s from—

(a) full release of a new organism

(b) possessing or disposing of any new organism released that has adverse effects on surrounding businesses

(4) A person is liable under subsection (1) whether or not—

(c) the person intended the act, omission, or breach; or

(d) the person was taking reasonable care when the act, omission, or breach occurred.

Recommendation: Insert into HSNO section 124G a new section 124G (3) liability of damage on release of new organisms.

9. Risk Implications and Lack of Democracy

The HSNO amendment Bill would create a dangerous power imbalance between the Authority and its duty of care to the public's democratic rights, which have been removed by section 53. It is clear that emphasis given to the Authority on positive effects would overlook any adverse effects.

This then has risk implications when read together with *new section 34B.*

Any person may apply to the Authority for approval to release, without controls, a new organism to which a conditional release approval applies.

(1) a) new organism to which a conditional release approval applies; and

b) the Authority may grant the application only if the Authority is satisfied that the criteria prescribed by an EPA notice for the purposes of the new section are met; and

(4) if the application is granted,—

a) the approval takes immediate effect; and

b) the conditional release approval expires with immediate effect; and

c) the new organism may be released without controls.

New section 53 provides for public notification of **certain** applications for approval with the following main changes:

The authority has the power to proceed with, and decide on, any reassessment under Part 5 of the HSNO Act if it is not publicly notified; and

(a)to require the Authority to consider whether there is likely to be significant public interest in certain applications and other matters and, if the Authority considers that there is likely to be significant public interest, to require those matters to be publicly notified;

53. The Authority must—

(a) do everything reasonably practicable to consult all persons who, in its opinion, are likely to be directly affected by the Authority's decision on the application, review, or reassessment; and

(b) give those persons a reasonable opportunity to make submissions and comments to the Authority on the application, review, or reassessment; and

(c) consider all submissions and comments received before approving or declining the application, or completing and making a decision on the review or reassessment.

If the Authority has the power to decide whether an application under Part 5 of the HSNO Act is not significant enough to notify the public, their decision is open to lack of expertise, vested interests and inconsistency of

standards. As seen with the RIS Omnibus changes to the HSNO Act[18] due to the time constraints only certain bodies were consulted on. the reasonable practical consultation is open to opinion rather than open public debate that sidelines a large proportion of the population.

We oppose the changes in the current HSNO Act clear guidelines relating to public notification. All developments outdoors. field trials, conditional releases and full releases must be fully notified to the public.

Recommendation: Maintain the requirement in the HSNO Act Sec:53 to notify the public of all developments outdoors, field trials, conditional releases and full releases.

10. Ambiguity in drafting.

The Authority's rapid assessment on the development of a genetically modified organism in containment contains ambiguities.

The document submitted by Te Rūnanga o Ngāi Tahu called Hazardous Substances and New Organisms Policy 2025 specified the responsibilities around the release of GM organisms, saying that it is to be notified and consulted on all applications and agreement has to be reached on release.

The Crown will:

a) Require that applications to release a new hazardous substance be publicly "notified";
b) Require that new organism (genetically modified and non-genetically modified) applications for release are notified and require agreement from Te Rūnanga prior to release;[19]

Rapid assessment is a streamlined, fast-track approval pathway for low-risk applications. It allows the Environmental Protection Authority (EPA) to assess and approve applications for hazardous substances or new organisms without the full, lengthy public notification process.

As there is no clear definition of **"rapid assessment"**, it appears that the Authority can fast track any development in outdoor containment, field test or conditional release, if the application is classed as "low risk" under the amended section 42 (1), overriding the need for public notification. This creates new vulnerabilities and risk effects shifting the Authority's assessment from "approve unless proven to be unsafe" to "exempt if it fits the criteria."

11. New Biotechnologies' (NBT) and Artificial Intelligence (AI)

If the amendments to HSNO are streamlining and modernising the HSNO Act, how will the NBT and AI be defined in law in the HSNO amendment Bill?
There is no information on how GMOs created using new breeding techniques (NBTs) and artificial intelligence (AI) digital technologies would be considered and, if classed as low risk, whether they would undergo a rapid assessment, conditional release, or full release. Will amendments to the regulations and schedule 2 reflect these developments? How would their status be decided under interpretations of the various genetic modification techniques?

Recommendation: Do not progress further until clarifying the decision-making processes around the creation of GMOs using NBTs and AI, and the tiers and classes they would come under in the HSNO Amendment Bill and HSNO Regulations.

[18] https://www.regulation.govt.nz/assets/RIS-Documents/RIS-Omnibus-changes-to-the-Hazardous-Substances-and-New-Organisms-Act-1996.pdf
[19] Te Rūnanga o Ngāi Tahu called Hazardous Substances and New Organisms Policy 2025 https://ngaitahu.iwi.nz/assets/Documents/NT-HSNO-Policy-2025-FINAL.pdf

In Summary

We reject the Bill as framed

1. **Recommendation:** Define Vagrants, Denewed organisms, Tiers, Rapid Assessment in the Interpretation 2, 2A.
2. **Recommendation:** Halt the HSNO Amendment Bill until the Regulations and Schedule 2 have been updated to inform public submitters how the tiers will be defined.
3. **Recommendation:** Halt the process until the new regulations and forms have been written, so a proper evaluation can be submitted on.
4. **Recommendation:** Do not progress further until clarifying the decision-making processes around the creation of GMOs using NBTs and AI, and the tiers and classes they would come under in the HSNO Amendment Bill and HSNO Regulations.
5. **Recommendation:** The Minister must not have the power to interfere with the approval process for any applications to field test new GM organisms. The same would go for applications for conditional and full release of new GMOs. The public must be notified prior to any test or release in their region.
6. **Recommendation:** We oppose the possibility that an experimental trial outdoors could be included in section 43 as not being of public interest. We propose new wording to say "indoor containment" or "a containment structure."
7. **Recommendation**: Maintain the requirement in the HSNO Act Sec:53 to notify the public of all developments outdoors, field trials, conditional releases and full releases.
8. **Recommendation:** Maintain the original HSNO Act interpretation of Field Test with no amendments
9. **Recommendation:** Insert into HSNO section 124G a new section 124G (3) for liability on full release.
10. **Recommendation**: All out door GE tests/releases be deemed as high risk and be notified to the public and territorial Authorities.
11. **Recommendation:** Support the amendment to sec:28A, if it does not include genetically modified, gene edited, gene drive, products from new genomic biotechnologies.

Ngā mihi,

Jon Muller
Secretary GE Free NZ in Food and Environment

Cc:
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