



GE Free New Zealand

In Food And Environment Inc.

PO Box 13402, Wellington, NZ

15 October 2023

Tēnā koe Mr. Hale and AgResearch RAEC Committee,

We note that the last two Annual Report to the EPA regarding activities under ERMA200223 do not have the comprehensive quarter outcomes as in previous reports prior to 2021. The Annual Report to the EPA regarding activities under ERMA200223 June 2022-2023 report only documents 2021-2022 outcomes for these applications. There is no complete annual report data from 1/06/2022- 1/06/2023 for-

- a. AE application 15407 cattle report is from 01/07/ 2021- 01/08/2022, p.11
 - b. AE application 15409 goat report from 18/07/2021-18/09/2022, p.13
 - c. AE application 15467, 15088 climate smart cattle report is from 06/09/2021- 20/11/2022, p.17
 - d. AE application 15523 goats for female only off spring report ends on 31/12/22. (p.22)
 - e. AE application 15567 sheep report ends on 31/12/2022.
- Please may we have the full and comprehensive data on the animals and facility for the year to June 2023?

Regarding application AE15407 The Ruakura committee on the 19/12/2022 asked for the results of the post mortem on the cow that was found dead (p.16).

Please may we have this information to **June 2023** -

- Please can we have the documentation on the dead cows post mortem report?
- The number of embryos created,
- How many embryo's transferred to conventional surrogate recipients at over the year to June 2023?
- How many embryo's transferred to GM cows over the year to June 2023?
- How many conventional surrogates and GM cows were impregnated?
- How many calves were born?
- How many were GM female and male?
- How many surrogates suffered from health problems, please document all health problems of all cows and their fate?

Regarding application AE 15409 The Ruakura committee on the goats 22/12/2022 in asked for

Numbers listed as used is not what was predicted and in original application it indicated that there were 41 goats available with up to 56 born. Given 16 goats were born, this suggested that number of resident goats was considerably less than indicated and it would be good to indicate why this occurred.

This question is asked on both Report A (0-13) and Stats (1.8) 0-20 this should be No, and the resultant questions answered.

More manipulations were carried out than listed in 1.2. This included abdominal ultrasound to monitor pregnancy, management of parturition, rearing of offspring and blood sampling.

Several adverse events occurred, and all should be covered in the report A, it is useful to refer to the adverse event number to link for easy reference.

Adverse event regraded some of these to D and C, the application indicated that some animals were genetically modified so that will need to be indicated please.

Please can we have the documentation up to **June 2023** on the answers to

- Report A clarifications on the goats that were conventional not genetically modified recipients and how many were genetically modified recipients?
- The adverse events that occurred in the conventional goat recipients?
- The number and type of adverse events that occurred in the genetically modified goat recipients?
- The number of embryos created,
- How many embryo's transferred to conventional surrogate recipients at over the year to June 2023?
- How many embryo's transferred to GM goats over the year to June 2023?
- How many conventional surrogates conventional and GM goats were impregnated?
- How many kids were born?
- How many were GM female and male?
- How many surrogates suffered from health problems, please document all health problems of all goats and kids and their fate?

Regarding AE 15409 on the goats resubmit 31/01/2023 (p. 16)

Report A: Please clarify that all goats covered by this application were normal/conventional (not genetically modified) with the purpose of breeding being maintaining of conventional animals for use in other experiments such as recipients for embryo transfer or normal controls. (p.16)

Please can we have the documentation on the answers to

- How many of the AI run recipient goats were GM?
- How many AI run recipient goats were conventional/non-GM recipients.
- What other transgenic embryo experiments are they impregnated with?
- How many of the 5 female kids born were GM?
- How many of the 11 male kids born were GM?

Regarding AE application 15467, climate smart cattle. The Ruakura committee asked on the 26/1/2023 (p.20) -

Please summarise other manipulations (other than implantation with data logger) that occurred to calves as per modification 3076 and 3156 – and if they did not occur, please outline why this did not happen.

Please elaborate on the calves born – 12 were slick edited that survived until getting a data logger, what were the others?

Section 1.4, Please reference AE 309, 336 & 340 within this section.

As section 6.11 of the statistics refers to an additional dead animal, please also explain within the Report A who that is and what happened to it (or create an adverse event if it fits that criteria). (p.20)

Please can we have the documentation up to **June 2023** on the answers to

- What were the transgenic trait or gene edits for the calves 3076 and 3156 –if they did not occur, please outline why this did not happen.
- The number of embryos created,
- How many embryo's transferred to conventional surrogate recipients at over the year to June 2023?
- How many embryo's transferred to GM cows over the year to June 2023?
- How many conventional surrogates and GM cows were impregnated?
- How many conventional cows were impregnated more than once?
- Were any surrogate cows used again to carry different trait modifications?
- If so, what were the constructs?
- How many calves were born?
- How many were GM female and male?
- How many surrogates suffered from health problems, please document all health problems of all cows and their fate?

12 calves born were slick edited

- How many calves were GM female
- How many calves were GM male?

15 calves born were PMEL

- Please could you explain PMEL, the PMEL trait and what is the expression outcome?
- How many calves were GM female
- How many calves were GM male?
- Section 1.4, Please reference AE 309, 336 & 340 within this section.
- As section 6.11 of the statistics refers to an additional dead animal, please also explain within the Report A who that is and what happened to it (or create an adverse event if it fits that criteria). (p.20)
- We are unable to find the report on 15088 please can this be provided?

Regarding AE application 15523 goats for female only off spring, the Ruakura committee asked on the 02/02/2023 (p.26) –

Section 1.2; Please provide more details regarding the animals used as it is currently unclear which two have been classified as Grade A on the statistics report.

The behaviour described for the bucks during manipulation would be consistent with a Grade B impact.

Was the third buck used (as per application), if not please provide a brief explanation why not. If used, please outline his contribution/manipulations.

Please may we have this information to **June 2023** -

- The reply to the use of a third buck and the semen collection outcomes and whether the semen has been frozen or used to produce embryos
- Was the third bucks semen viable?
- The number of embryos created,

- How many embryo's transferred to conventional and GM surrogate recipients at over the year to June 2023?
- How many conventional surrogates conventional and GM goats were impregnated?
- How many kids were born?
- How many were GM female and male?
- How many surrogates suffered from health problems, please document all health problems of all goats and kids and their fate?

Regarding AE application 15567 sheep report is from 04/03/2022-31/12/2022.

The supporting information does not record the number of sheep (p.8) who received ET yet the table (p. 7) records 15 lambs born (9 female 6 male)

Please may we have this information to **June 2023** -

- How many of the 9 female lambs born were GM?
- How many of the 6 male lambs were GM?
- How many of the 15 GM lambs survived to weaning?
- If they dies what was the cause?
- We would like the adverse events reports 320, 349, 350, 352, 353, 354 on the ewes and lambs?
- The number of embryos created,
- How many embryo's transferred to conventional surrogate recipients at over the year to June 2023?
- How many lambs were born?
- How many were GM female and male?
- How many surrogates suffered from health problems, please document all health problems of all sheep and lambs and their fate?
- Please provide the report on the genetic analysis of the IVP <>cloned chimaera on the brain, liver, kidney tissues?
- Please explain the terminology of "chimaera"?
- What different species of DNA did it have?
- Is the IVP conducted by AgResearch in its on-site laboratories?
- Are the laboratories in Ruakura or another NZ AgResearch Site?
- If not, is the IVP development outsourced to a private company in NZ or overseas?
- Please can you advise how long the rams who tested positive for Johne's disease were kept alive?
- Were they vaccinated for Johne's disease?
- Did they run with the flock of sheep?
- If so, please explain why were they allowed to intermix with the Johne's disease.
- May we have the report to MPI regarding the conditions they placed on the animals with Johne's disease?

We regard the oversight and consideration by the EPA on the ERMA200223 Annual report as poor. The EPA has ignored the missing data and unreported activities and considerable delays in providing the reports between 01/06/2022 - 31/5/2023. This constitutes a serious breach of the required controls regarding ERMA200223 annual reports information provided to the EPA. The ERMA20023 decision says

Control 11: Annual reporting states

The approval holder must provide an annual report to ERMA New Zealand by 31 August of each year while this approval is in use.

Each annual report will be made available to the public and must include a description of:

- a) any outdoor development activities;*

b) any unforeseen adverse effects resulting from the genetic modifications;
c) any relationship development and management initiatives undertaken with any iwi liaison group

- Please explain why the EPA has not addressed the absence of information in the 2023 ERMA200223 Annual report from 31/1/2023 – 01/06/2023?

In Summary

Please provide the documentation and replies in the ERMA200223 Annual report, 2023 they should have been provided by August 31 2023.

We request the documentation under the Official Information Act (OIA),

Nāku iti noa, nā

Claire Bleakley

President GE Free New Zealand in Food and Environment
027 3486731

Cc: Jon Muller

Secretary GE Free New Zealand in Food and Environment
Jon Carapiet
Spokesperson GE Free New Zealand in Food and Environment