



GE Free New Zealand

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www.gefree.org.nz

20 November 2025.

Kia ora Ms Farrant,

Thank you for your reply. Please could you clarify your response to Question 4 (Question 4 was transferred because there is no requirement for testing for any genetic elements to have broken down on site.)

I believe that control 6 of the ERMA200223 required under HSNO 45A that the approval for the end of a field trial must include controls to ensure that, after the end of the development or field test, the organism and any heritable material from the organism is removed or destroyed;

The only way to do that is to do Horizontal Gene Transfer Testing to ensure all heritable material and their elements are removed or destroyed.

1. Please could we have all documents that the EPA required for the clean-up of the site to confirm that there are no viable GE elements left?
 1. No transgene genetic elements from the milk, urine, faeces or blood products entered the soil ecosystems
 2. No transgene genetic elements leached from the unlined offal pits into the ground water or soil ecosystems.
2. If you do not have the information please could you advise us of the people who do and who signed off the 25 years field trial to show that the field trial genetic elements were destroyed?

Ngā mihi,
Jon Muller
Secretary GE Free NZ

Cc: Claire Bleakley 027 348 6731

References:

45A Controls required for certain developments and for all field tests

- (1) This section applies to an approval under [section 45](#)—
 - (a) a new organism in containment that is a genetically modified organism, to the extent that the development does not take place in a containment structure; or
 - (b) to field test a new organism in containment if the new organism is a genetically modified organism.
- 2) An approval—
 - (a) must include controls to ensure that, after the end of the development or field test, the organism and any heritable material from the organism is removed or destroyed; and
 - (b) may include controls to ensure that, after the end of the development or field test and after heritable material is removed or destroyed, some or all of the genetic elements remaining from the organism are removed or destroyed.

Please may we have this information under the Official Information Act.