

27 October 2022

GE Free NZ  
Attn: Jon Muller  
via email: [secretary@gefrees.org.nz](mailto:secretary@gefrees.org.nz); [claire@gefrees.org.nz](mailto:claire@gefrees.org.nz)

Dear Jon

Official Information Act request

Further to your OIA request dated 3 October 2022 and our subsequent agreed clarification, please find our responses below with your original request in bold and our explanation in italics. Further information is available on the EPA website here:

<https://www.epa.govt.nz/database-search/hsno-application-register/view/ERMA200479>

Your request: **Please can we have all information and documents relating to GMF100001/ ERMA200479 transgenic trees from 2017-2022, specifically -**

**1. How many transgenic trees have been grown?**

*Several independent experiments have been carried out during the dates specified. This includes trees planted between 2017-2022 and trees that were planted prior to 2017. In total 3594 trees have been planted or were already growing in the trial site.*

**2. What are their traits?**

*All trees that have been grown in the trial have addressed traits approved in GMF100001. Traits addressed in the specified timescale are reproduction, biomass acquisition/growth, biomass utilization and identification (e.g., selection marker and reporter genes).*

**3. Did they contain any genes conferring insecticidal endotoxins?**

*Scion has not carried out any experiments with genes encoding insecticidal endotoxins under GMF100001. This is not included in the traits approved under this approval.*

**4. Did they contain any genes for herbicide tolerance?**

*No experiments that involved growing trees containing genes for herbicide tolerance have been conducted between 2017-2022.*

**5. How many transgenic trees have been removed?**

*Currently 750 transgenic trees are growing in the trial, 2844 have been removed.*

**6. Were there any diseases that arose in the transgenic trees?**

*No diseases have been specifically associated with transgenic trees. Some trees planted in the trial have been affected by disease, predominately associated with *Phytophthora* infection. All our field trial experiments include control non-transgenic (unmodified) trees. No differences in infection rate or disease severity have been observed between transgenic and control (non-transgenic) trees.*

**a. If so, what were they, and what traits did they express?**

*As above, no diseases specifically associated with transgenic trees have been identified.*

**7. Did the transgenic trees suffer from growth problems?**

*No growth problems associated with transgenic trees were observed.*

**a. If so, what were they, and what traits did they express?** *Not applicable.*

**8. Did the transgenic trees suffer from pest problems?**

*No significant damage due to insect, bird or mammalian pests has been observed in either transgenic or control (non-transgenic) trees.*

**a. If so, what were they, and what traits did they express?** *Not applicable.*

**9. How many transgenic trees produced reproductive structures?**

*EPA approval GMF100001 specifies that immature (non-viable) reproductive structures are identified and removed prior to their maturation and that the tree that produced them is killed. In the specified time immature reproductive structures were identified on 651 transgenic trees.*

*In addition, during a scheduled inspection in March 2020 possible early-stage reproductive structures were identified on trees in a trial testing biomass acquisition. These structures were too young to confirm as reproductive and our existing protocol would be to continue to monitor them during future inspections. At this time, the first covid-19 lockdown was in place and the future availability of staff should covid-19 become widespread was uncertain. Out of an over-abundance of caution it was decided to immediately terminate this trial. 404 trees were identified as carrying possible early-stage reproductive structures. These were treated as if the structures were confirmed.*

**10. The viability of the reproductive structures that were removed from the transgenic trees?**

*The controls of approval GMF100001 require that an inspection and monitoring system is in place to identify and then destroy immature reproductive structure. No transgenic tree has developed reproductive structures that contain viable heritable material.*

**11. The different transgenic traits that each reproductive structure expressed?**

*As in Q10, reproductive structures containing viable heritable material have not developed on any tree grown in the trial.*

You have the right to seek an investigation and review by the Ombudsman of our decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact Angela Vircavs (angela.vircavs@scionresearch.com).

Yours sincerely



Dr Julian Elder  
CEO