FOREST OWNERS ASSOCIATION

Submission

On

The Gene Technology Bill 2024.

Submission to:

New Zealand Parliament
Health Committee
Parliament Buildings
Wellington

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Trees for our future

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Introductory Comments

1. The Forest Owners Association (FOA) welcomes the opportunity to provide feedback on the Consultation on the proposed Gene Technology Bill 2024amendments to the Biosecurity Act.
2. The Forest Owners Association wishes to be heard in support of our submission.

Summary

3. The FOA supports the Gene Technology Bill and the new Gene Technology Regulator as it adopts a pragmatic risk proportionate, evidence-based management approach that will be more enabling for low-risk technologies and allow these to benefit New Zealand, while still regulating higher risk activities.
4. There are a wide range of environmental and economic opportunities that may arise from the application of safe genetic technologies.
5. The FOA strongly recommends that the Gene Technology Bill remain focused on setting the high level and enabling legislative framework for the Gene Technology Regulator and for the details and requirements to be addressed within the supporting regulations.
6. The FOA recommends that consideration be given to separating food and fibre (particularly forestry) where appropriate as these will likely have different risk profiles (and concerns) and therefore regulatory and administrative requirements, and associated costs.

Submitters

The Forest Owners Association (FOA)

7. The FOA is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million of New Zealand's 1.8 million hectares of plantation forests. FOA members account for over 70% of the annual harvest.

The Plantation Forestry Sector

8. In 2024, the forest growing sector was worth $5.748 billion in export value, and this is expected to increase to $5.980billion in 2024[1] due to a combination of reduced supply and subdued international markets which are not anticipated to rebound. The sector contributes about $9 billion toward GDP across its wider supply chain. The Ministry for Primary Industries expects forest product export values to exceed $9 billion by 2030.[2]
9. Plantation forests are a unique primary industry sector that contribute significant public benefit through environmental services when compared to other sectors, including, *inter alia*, soil conservation, improving air and water quality, erosion control, carbon sequestration and offsetting emissions, recreational access, contribution to biodiversity and conservation. They

[1] https://www.mpi.govt.nz/dmsdocument/66648-Situation-and-Outlook-for-Primary-Industries-SOPI-December-2024
[2] https://www.mpi.govt.nz/dmsdocument/41319-fit-for-a-better-world-background-analysis-on-export-earnings-in-the-primary-sector

also represent feedstocks for current and future environmentally sustainable energy production (i.e., bioenergy) and for high-value products that offer alternatives to those made from fossil fuels. This vital role is only going to increase in the future.

10. The forestry sector also supports the employment of over 40,000 people in rural and urban New Zealand throughout its supply chains.
11. However, New Zealand's plantation forests face numerous challenges and threats such as pests and pathogens, changing climatic conditions, changing land use and land use expectations, etc. The forestry sector works hard to address and adapt to these challenges, but it needs access to the full suite of tools and technologies to enable it to overcome, prevent, be resilient to, or adapt to these challenges.
12. Many of these challenges are occurring at a pace that exceeds the ability of traditional tools and approaches to be effective. There is a critical need to shorten the deployment timeframes of new tools to be able to respond to these challenges.

Feedback

13. The FOA supports the Gene Technology Bill and the new Gene Technology Regulator as it adopts a pragmatic risk proportionate, evidence-based management approach that will be more enabling for low-risk technologies and allow these to benefit New Zealand, while still regulating higher risk activities.
14. The proposed Gene Technology Bill will also ensure that the regulatory framework is modernised, future-proofed, and will enable the regulator to take account of potential future changes in technology.
15. The FOA has long advocated for a review and subsequent update of the regulations to make them more risk-based and enabling to allow New Zealand to take advantage of the many benefits that new, safer, more specific gene technologies (namely gene editing) have to offer New Zealand, and the forestry sector.
16. The existing regulations are outdated and restrictive to the point that they are a barrier to the development and application of modern advances and innovations in genetic technologies to the benefit of new Zealand's environmental, economic, socio-cultural and human health values.
17. The application of genetic technologies, and in particular gene editing, presents many opportunities for the New Zealand plantation forestry sector.
18. There are a wide range of potential opportunities that may arise for the sector from the application of safe genetic technologies including:

    - Progressing currently stalled gene editing research into developing sterile or low spread-risk Douglas-fir to enable this high value species to be grown in areas where it is no longer favoured due to its wilding risk
    - Fast tracking breeding programs (using gene editing to target trait selection more efficiently and accurately)
    - Improvements in productivity (i.e., growth rates, resilience, climate adaptation)
    - Improved timber quality and value (i.e., quantitative improvements in density, strength, decay resistance etc.), in the same, or smaller, forest estate footprint

- Improved pest and disease resistance and resilience which will be crucial as biosecurity threats increase
- Improved environmental sustainability (i.e., reduced chemical use)
- Improved and more targeted pest management and pest control techniques for industry and non-industry pests and pathogens (i.e. gene drives, RNAi)
- Increased climate change adaptation (i.e., drought or temperature tolerance, pest resistance etc.)
- Research and Innovation - improving ability to develop, apply, or export, technology for future industry innovations and growing scientific knowledge)

19. The FOA strongly recommends that the Gene Technology Bill remain focused on setting the high level and enabling legislative framework for the Gene Technology Regulator and for the details and requirements to be addressed within the supporting regulations. This will ensure that the Bill is enabling and future proofed and that as technology and evidence evolves, any resulting changes can be more efficiently addressed through the regulatory change process rather than the legislative change process.
20. The FOA recommends that consideration be given to separating food and fibre (particularly forestry) where appropriate as these will likely have different risk profiles (and concerns) and therefore regulatory and administrative requirements, and associated costs. This would align with the risk proportionate approach that the Bill is aiming to deliver and avoid a "one-size-fits-all" approach as is evident in the current legislation and its application.
21. Consideration should be given to the merits of maintaining some form of efficient register or record of the proposed "unregulated" genetic technology applications. This may provide some insight into the uptake and use of this technology, while also contributing to the evidence base. However, as noted above this should be considered as part of the supporting regulations rather than the Bill.

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