

17 February 2025

Health Select Committee

Parliament Buildings
Wellington 6160
New Zealand

By email: he@parliament.govt.nz

Dear Members of the Health Select Committee,

RE: NZ Gene Technology Bill 2024

The Gene Technology Bill 2024 represents an important step toward a modern, science-based regulatory framework for gene technology in New Zealand. The proposed framework aligns with international best practices and has the potential to support innovation while ensuring appropriate risk management.

Australia provides a clear example of how a well-regulated gene technology system can function effectively. For more than 20 years, the Australian seed industry has successfully managed the cultivation of genetically modified (GM) crops under a robust, risk-proportionate regulatory system. This has enabled innovation in agriculture, improved productivity, and provided Australian farmers with access to the latest technologies while maintaining coexistence between GM, conventional, and organic production systems.

New Zealand is well-positioned to follow a similar path. The proposed Bill adopts a tiered risk assessment model that, if properly implemented, can ensure that low-risk technologies—such as gene editing techniques producing results indistinguishable from conventional breeding—are not unnecessarily overregulated. The establishment of an independent Gene Technology Regulator within the Environmental Protection Authority further strengthens the credibility and scientific integrity of the framework.

Coexistence within supply chains has been successfully managed in Australia, demonstrating that different production systems can thrive alongside each other. Segregation strategies, market differentiation, and robust supply chain management have allowed Australian farmers to produce GM, conventional, and organic varieties without disruption.

Importantly, no market access disadvantage has been observed as a result of adopting gene technology. Australian agricultural exports, including GM and non-GM products, continue to access key international markets, including regions with strict regulatory requirements such as the

European Union. This demonstrates that a well-managed regulatory framework can support both innovation and trade without compromising market opportunities.

To ensure the success of this Bill, I encourage the Committee to consider:

- Ensuring that regulations exempt gene-edited products that are indistinguishable from conventional breeding.
- Reducing regulatory duplication to streamline approvals and provide clarity for industry.
- Delaying cost recovery implementation until the framework is operating effectively and its impact on innovation and industry growth has been assessed.
- Supporting clear, science-based criteria for coexistence and supply chain management to maintain market access for all sectors.
- Supporting implementation in a way that ensures coexistence across different farming systems.
- Strengthening the independence of the Gene Technology Regulator to ensure objective and consistent decision-making.

The Gene Technology Bill is a timely reform that will allow New Zealand to remain competitive in agricultural innovation while maintaining its environmental and market integrity.

Yours sincerely



Katherine Delbridge
Chief Executive Officer