

Submission to ERMA on a notified application ERMA200223

Submission on the application by AgResearch to develop in indoor and outdoor containment goats, sheep and cows genetically modified to produce human therapeutic proteins, and to alter levels of gene activities and proteins for the study of gene function, milk composition and disease resistance

Deadline 18 December 2009

Email to: submissions@erманz.govt.nz

Post to: ERMA New Zealand, PO Box 131, Wellington 6140

Name of submitter:

Your address:

Email:

Phone:

I submit that this application should never have been accepted by ERMA and should be declined for the following reasons:

- 1) The application is in direct contradiction of the findings of the Royal Commission on Genetic Modification (RCGM) that recommended food-animals not be used as 'bioreactors'.
- 2) It is a breach of natural justice for ERMA to have accepted this application while the High Court decision finding flaws in the development application is still under appeal.
- 3) It is not reasonable for ERMA to expect me to make an assessment of the all-encompassing list of genetic elements requested by the applicant. Appendix II is a library download of Genetic stock strains, many of the strain numbers are undescribed and unknown, and not one protein that is being created is fully identified.
- 4) This application does not allow me to understand what is being created in respect to the identity, modification or expression of the GM animal, how many proteins are going to be made or what they are.
- 5) It is not possible for me or scientists and experts in ethics to make submissions as ERMA has not required the applicant to specify what they are actually doing that is different from existing proteins and patented products.
- 6) It is wrong to put at risk New Zealand's bio-security, or the economic value and public-benefit of the New Zealand Brand. Any risk of creating new diseases by experimenting outdoors on NZ animals threaten markets overseas, especially if animal waste, effluent and blood products contaminate land, water or air.
- 7) I do not agree to the creation of deformities and suffering in animals in order to make 'cheaper' pharmaceuticals, when other production methods are available. Treating animals in this way is against my moral, ethical, spiritual, and religious values. The Bioethics Council also called for an ethical review of such practices.
- 8) This application is so undefined and generic that I do not know how it will affect me or my family, lifestyle or my grandchildren.

I wish ERMA New Zealand to decline the application and restore public confidence.

I wish to be heard in support of my submission