



ERMA NEW ZEALAND

# INFORMATION SHEET

NUMBER 48  
August 2007

## From the Lab to the Marketplace – A Strategic Approach for Scientists Making HSNO Applications

The Hazardous Substances and New Organisms (HSNO) Act is part of the science landscape. You will require approval from ERMA New Zealand if you wish to import or develop a new organism, or genetically modify an existing one.

However, the process may not be as bad as you think. Application types range from a relatively cheap and easy containment application, through to an extensive application for a full release. Scientific research often only requires approval for containment, or at most a field trial. Even if your ultimate goal is the full release of a new or genetically modified organism, research usually begins in the lab, and at that point all you need to apply for is a containment approval.

### Thinking Outside the Square

There are ways to make a containment application more efficient. A containment approval does not need to be limited to one species. You can include multiple species into one application providing they have the same risk profile; for example, all Risk Group 1 bacteria. Also, a containment approval can be given at any taxonomic level. ERMA has already approved an application to import the entire plant kingdom into containment to be used as herbarium specimens at herbaria. In many cases, a containment approval for non-GM organisms can be used by more than one organisation providing the purpose of the research is the same and the controls are met. The costs of the application could then be shared.

If you wish to take your research beyond the lab, the next step would be an application for a field trial, a conditional release or a full release. The best option will depend on the amount of information you have collected and the certainty you have with regards to the risks and benefits of releasing the organism. Each step of the process gives you the opportunity to gather more information and provide the foundations for the next stage.

### Consultation is Easy – Yeah Right!

The HSNO Act requires that all effects significant to Māori are included in your application. However, if there are no risks or benefits then this area of the application can be completed with relatively little effort and expense. Some applications may not require consultation. But it is often the best and easiest way to obtain information on the significance to Māori.

Some form of consultation is likely to be required if the application:

- involves or impacts on native or valued flora or fauna
- uses human genetic material **from Māori**
- is a field trial or release of a genetically modified organism, or
- poses disproportionate health or wellbeing effects to Māori.

A general rule of thumb is that if an approval will only result in local impacts, then it is sufficient to only consult with local hapū and iwi who are directly affected. National consultation will be required for an application if it affects Māori nationally.

National consultation has three levels that range from distribution of information packs through to nationwide meetings in key regions. The latter would only be required for the most complex applications such as a release of a genetically modified organism. To date, this level of engagement has not been required for a new organism application. We are happy to advise you on whether or not consultation will be required and the type of information you will need to provide, and encourage you to contact us as early as possible. You can also download our guideline *Working with Māori under the HSNO Act 1996* from our website.

We also suggest that you begin engaging with Māori from the very beginning. Costs can be kept to a minimum if consultation and information gathering is conducted well in advance of lodging your application. Longer term costs are usually lower if a good relationship is first established with relevant hapū and iwi. This is both more cost effective and efficient in the long term.

## Funding into the Future

Build **all** relevant HSNO costs into your funding proposals. Some applications require public consultation, possibly even a public hearing. Knowing your long-term application strategy from the outset will help you anticipate, and budget for, these future HSNO costs. Your funding proposal should also include the costs of engaging with Māori.

## Here to Help

Having a well-planned strategy 'from the lab to the market place' is in the best interests of both you and ERMA. So come and talk to us, and not just when you are ready to make an application but at the very outset of your research planning. Tell us your long-term objective and we can help you plan an effective strategy for meeting your HSNO requirements.

The purpose of the HSNO Act (and ERMA New Zealand) is to protect the environment and the health and safety of people from the harmful effects of new organisms. But it is also our objective to support science and innovation and we are working hard to do just that.

**Come and talk to us at:**

**BP House, 20 Customhouse Quay, PO Box 131, Wellington, Ph (04) 916 2426**

**[www.ermanz.govt.nz](http://www.ermanz.govt.nz)**