

SUBMISSION

TO: The Ministry for Primary Industries

FROM: Apiculture New Zealand

SUBMISSION ON: Would New Zealand benefit from new organic regulation?

DATE: 11 June 2018

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1. INTRODUCTION

- 1.1. Apiculture New Zealand (ApiNZ) welcomes the opportunity to make this submission to the Ministry for Primary Industries (MPI) on the benefits of new organic regulation for New Zealand.
- 1.2. ApiNZ supports MPI's intention to introduce a stronger regulatory approach to organic production and outlines a number of factors for consideration as MPI develops its regulatory framework.
- 1.3. ApiNZ appreciates MPI's early consultation on this matter and is happy to continue to work with MPI as it further develops this framework.

2. ABOUT APICULTURE NEW ZEALAND

- 2.1. ApiNZ is the peak national body representing the apiculture industry in New Zealand. ApiNZ aims to support and deliver benefit to the New Zealand apiculture industry by creating a positive industry profile, business environment, and opportunities for members.
- 2.2. ApiNZ is helping to progress key industry priorities, both through its management team and via the work of five industry focus groups which are representative of its membership base. These focus groups are:
 - Education and Skills
 - Standards, Compliance and Regulatory
 - Science and Research
 - Biosecurity and GIA
 - Māori Engagement.

3. APINZ'S RESPONSE TO MPI'S CONSULTATION QUESTIONS

Question 1: Scope

- 3.1. ApiNZ supports MPI's proposed scope, focusing on primary and processed products, which includes Apiculture as well as affiliated industries, such as agriculture and horticulture. In our view this scope is appropriate for New Zealand. ApiNZ submits that this initial scope could be extended once an effective framework is up and running.

Question 2: Current Context for Organics

- 3.2. ApiNZ agrees with MPI's assessment of the organics sector in New Zealand. We agree that the market for organics is growing and that this growth is driving increased complexity. ApiNZ considers that these are all factors that support the introduction of regulation for organics in New Zealand.

Question 3: Description of the Current Regulatory Environment for Organics

- 3.3. ApiNZ considers that MPI has captured the current regulatory environment well in its description. ApiNZ notes that the current range of certification options, including BioGro, IFOAM, Hua Parakore, and Demeter, as well as businesses that choose to "self-certify."
- 3.4. ApiNZ submits that this complexity also adds to market confusion and reinforces the need to introduce regulation. Well considered regulation ought to help reduce confusion and therefore reduce compliance costs for organisations wishing to sell certified organic products.

Question 4: Is this a good opportunity to change the way organics are regulated in New Zealand?

3.5. Yes. In ApiNZ's view this represents a good opportunity to change the definition of organic at a regulatory level, helping to provide consumer assurance. ApiNZ expects that this will help to ensure ongoing market access as well as the negotiation of new market access.

Question 5: Have the appropriate objectives for a new organic regime been identified, and what a new regime should achieve.

3.6. Yes. ApiNZ considers that MPI has identified the most appropriate objectives have been identified. From our perspective we agree with the following key objectives:

- Providing consumer confidence in way organic products are products, and a variety to choose from
- Businesses having regulatory certainty to invest and innovate organic products
- The regulatory regime is effective at enabling trade
- The regulatory regime has flexibility, and simple to understand and administer, and finally that the costs to business and consumers are proportionate to the overall benefits

Question 6: Requirements for production methods that would be best suited to organic production.

Issue 1: Should a new standard be voluntary or mandatory?

3.7. From the perspective of international food safety compliance and to gain the best outcome in market negotiations, "organic" needs to be a preserved identity. This can only work if it is a mandatory standard for all organic operators, as this provides the most assurance of compliance.

3.8. In our view, a certification logo is adequate for the domestic market, however, consumers in international markets are only familiar with their own market logo, or one of the big three (in order: USDA, EU green leaf, Canada maple leaf). We note that EcoCert, as a certifying body, transcends this and has international familiarity as well. Equivalency agreements would need to be worked out regulator to regulator to ensure exporters could continue to use the market relevant logo.

3.9. We note that there is mention of a Trans-Tasman Mutual Recognition Arrangement. ApiNZ notes that allowing the carte blanche import of organic certified product from Australia is a biosecurity risk and against the import health standard for our industry. We therefore submit that this section is amended to highlight exemptions under the IHS.

Issue 2: How should we check that relevant businesses meet the standard?

3.10. ApiNZ supports option 2C from the paper. That is, the ongoing spot check verification for all organic business. In our view, having all organic businesses go through ongoing verification gives the most assurance for the product being true to label, to the consumer, and to our overseas trading partners.

Additional Comments about the proposed legislative settings

3.11. For an industry view of mandatory compliance, legislation would be required. It would be prudent to note that there would need to be education and time for the transitional

arrangements. Citing the manuka honey definition changes immediately prior to the effective date of the GREX meant there was little time to educate industry or be able to adequately plan a transition.