

Looking at the last part in the proposal I think the preferred option looks really good and would go with that, it sort of answers my concerns but whatever please make it simple.

Asurequality should lead the way with these standards.

There should be Government to Government agreements on parity with other Countries.

One producer audit covers all.

Thank you very much

Regards Rob Bargh

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s 9(2)(a)

From: John Falls <s 9(2)(a)>
Sent: Friday, 18 May 2018 8:16 AM
To: Organics Consultation
Subject: National Standards for Organics
Attachments: Generic submission letter May 16.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: In database

Dear Sir/Madam,

I attach a letter supporting the proposal for a national organic standard.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

John Falls,

Manager

Arcadia Orchard,

s 9(2)(a)

Email: s 9(2)(a)

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

I fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

In doing so, this would align New Zealand with international best practice for protecting organic products, provide all customers and consumers with assurance and place us in the best position for international trade negotiations.

Once New Zealand has appropriate organic legislation, it would have a positive impact for all of New Zealand by:

- protecting the term and use of organic
- providing security for those seeking to invest
- assisting with the provision of other environmental claims
- aligning New Zealand's strategic direction as a country that provides value to quality products.

With a well-designed regime, all those who wish to become organically certified can do so, regardless of scale.

Please keep me informed of development of this important work.

Yours faithfully

John Falls

s 9(2)(a)

From: Scott Paterson s 9(2)(a)
Sent: Sunday, 20 May 2018 4:56 PM
To: Organics Consultation
Subject: Letter in support for Submission of why New Zealand would benefit from new organic regulation?
Attachments: MPI Biogro letter.pdf
Categories: In database

Hi there,

Please see attached.

Kind Regards

Scott Paterson
Founder and Director
Puraty Limited

s 9(2)

(a)

M s 9(2)(a)

www.puraty.com

Medicinal organic herbal teas. Solving health challenges with natural medicine.

Scott Paterson
Director
Puraty Limited

s 9(2)(a)

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

Puraty Limited fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

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Please keep me informed of development of this important work.

Yours sincerely

s 9(2)(a)

Scott Paterson

s 9(2)(a)

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s 9(2)(a)

From: Justin Wilson <s 9(2)(a)>
Sent: Monday, 21 May 2018 9:17 AM
To: Organics Consultation
Subject: MPI Discussion Paper No: 2018/09
Attachments: BEO submission organic regulation.pdf

Categories: In database

Hello,

Please find attached our submission to the discussion paper on organics No: 2018/09.

Thanks

Justin Wilson | Compliance Manager

Bakels Edible Oils (NZ) Ltd

✉ PO Box 4117, Mt Maunganui 3149

🏠 5 Hutton Place, Mt Maunganui 3116

☎ DDI +64 7 927 5622 | 📠 s 9(2)(a) | 📞 + 64 7 575 9441

🌐 Visit our Website: www.beobakels.co.nz

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Would New Zealand benefit from new organic regulation?

MPI Discussion Paper No: 2018/09

15 May 2018

Justin Wilson
Compliance Manager
Bakels Edible Oils (NZ) Limited
07 575 9285
5 Hutton Place, Mount Maunganui 3116

s 9(2)(a)

Bakels Edible Oils (NZ) Limited has approximately 130 employees and operates a Risk Management Programme registered with the Ministry for Primary Industries for the manufacture and export of Animal and Dairy Products and a National Programme 3 registered with the Tauranga City Council for the manufacture of Edible Plant Oil Products.

We contract process two certified organic plant oils for different business customers who on-sell the product. All other products we manufacture are non-organic. We are certified annually by BioGro.

We believe that there would be benefit from a new organic regulation. Our hope would be that the new regulation would gather organic requirements into a single document to support trade negotiation equivalence efforts and align with the standards of our export partners.

- We agree with the preferred option 1C. If the cost to small business is an issue then we would suggest that the new regulation only apply to businesses that export organic products or businesses that manufacture ingredients that will be used in organic product for export so that the benefits of a national standard can still be used in export negotiations. Domestic products can then be voluntary with MPI encouraging uptake and providing information to consumers about the national standard.
- We agree with the preferred option 2C and would suggest that the verification is risk based as per the National Programmes under the Food Act. Exemptions should be very limited as even producers that sell directly to consumers could potentially cross contaminate their products with non-organic ingredients or use restricted cleaning agents on equipment. At minimum these businesses should have a verification equivalent to the National Programme 1, where an initial verification is completed and then only required if there is an issue.

s 9(2)(a)

From: James Trevelyan s 9(2)(a)
Sent: Monday, 21 May 2018 4:27 PM
To: Organics Consultation
Subject: FW: Message from "RNP002673E3FA3A"
Attachments: 20180521202328787.pdf

Categories: In database

To whom it may concern,

Please find attached a letter in support of the benefit from an organic regulation.

James Trevelyan
Managing Director

s 9(2)(a)

[Not relevant to request]

21/05/2018

To whom it may concern,

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

I fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

In doing so, this would align New Zealand with international best practice for protecting organic products, provide all customers and consumers with assurance and place us in the best position for international trade negotiations.

Once New Zealand has appropriate organic legislation, it would have a positive impact for all of New Zealand by:

- protecting the term and use of organic
- providing security for those seeking to invest
- assisting with the provision of other environmental claims
- aligning New Zealand's strategic direction as a country that provides value to quality products.

With a well-designed regime, all those who wish to become organically certified can do so, regardless of scale.

Please keep me informed of development of this important work.

Yours faithfully



James Trevelyan

From: Catriona and Mark White s 9(2)(a)
Sent: Wednesday, 23 May 2018 9:47 AM
To: Organics Consultation
Subject: submission for organic regulation
Attachments: Submission letter for organic regulation 23 May 2018.pdf

Categories: In database

Hi there

Please find attached our submission in support of the proposed organic regulation.

Cheers

Mark and Catriona White

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Catriona and Mark White
Coastal Kiwis Limited

s 9(2)(a)

s 9(2)(a)

Dear Sir/Madam

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

We both fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

In doing so, this would align New Zealand with international best practice for protecting organic products, provide all customers and consumers with assurance and place us in the best position for international trade negotiations.

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Yours faithfully

s 9(2)(a)

Catriona and Mark White

From: Ian Rodger s 9(2)(a)
Sent: Wednesday, 23 May 2018 3:06 PM
To: Organics Consultation; s 9(2)(a)
Subject: Would NZ benefit from new organic regulation?

Categories: In database

A brief comment of support for 'Mandatory Regulation within the Organics Industry'.

I fully support regulation for reason of credibility both within NZ and the wider world.

That the benefit of 'certified organic' (arbitrary description) gives credibility to the producer and the industry and confidence to buy by the consumer.

The current aura of the term 'organic' is far from credible and indeed the sale of 'organic' product is indeed questionable as to 'how organic' it really is.

The term 'organic' under a regime of 'no regulation = no description' means what? Just grown in 'organic matter' for example.

In summary - I fully support Mandatory registration of all 'organic production grown for sale' in NZ.

If I remember correctly the 'organic business' of some 30 years ago was boom and bust because of the lack of credibility. Supermarkets had a brief flurry into the business as an example. the 'organic section' soon disappeared.

I speak only as a small time retired farmer - stock and crop and one who spent 35 years in the agchem industry (bringing no bias to the table!)

Thank you for the opportunity to comment.

Kind regards

Ian Rodger

*Howick, Auckland
New Zealand 2014*

From: Stephen McTurk s 9(2)(a)
Sent: Friday, 25 May 2018 8:00 AM
To: Organics Consultation
Subject: Organic consultation
Attachments: MPI organic sbmission.pdf

Categories: In database

Please find attached organic submission form

Regards - Stephen McTurk

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Stephen McTurk – Organic Kiwifruit Orchard manager

Bobs Orchard

s 9(2)(a)

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

I/we/ name of organisation/ fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

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Please keep me informed of development of this important work.

Yours faithfully

s 9(2)(a)

Stephen McTurk

24/5/2018

From: JH & ME McTavish s 9(2)(a)
Sent: Saturday, 26 May 2018 9:19 AM
To: Organics Consultation
Subject: Organic Standards Submission
Attachments: IMG.jpg

Categories: In database

Re Organic Standards Consultation:

Please find attached our letter in support of MPI's proposed development of an Organic Act defining organic standards for New Zealand.

yours faithfully,

J and M McTavish

Fran mac Orchard(Certified organic transition 1997 and fully organic 2000)

Tauranga

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John and Mary McTavish

Franmac Orchard,

s 9(2)(a)

25th May 2018

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

We, John and Mary McTavish, owners of Franmac Orchard, fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

In doing so, this would align New Zealand with international best practice for protecting organic products, provide all customers and consumers with assurance and place us in the best position for international trade negotiations.

Once New Zealand has appropriate organic legislation, it would have a positive impact for all of New Zealand by:

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Please keep me informed of development of this important work.

s 9(2)(a)

John and Mary McTavish

Ph: s 9(2)(a)

email s 9(2)(a)

s 9(2)(a)

From: Greg Taylor s 9(2)(a)
Sent: Sunday, 27 May 2018 11:49 PM
To: Organics Consultation
Subject: Organics Consultation
Attachments: Submission MPI .pdf

Categories: In database

MPI Organics Consultation

Attached is our submission in relation to your public consultation request.

Regards

Greg Taylor

s 9(2)(a)

Mob s 9(2)(a)

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Gregory David Taylor

Trustee

The G D Taylor Trust

s 9(2)(a)

Phone s 9(2)(a)

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

I, Gregory David Taylor, Trustee, The G D Taylor Trust fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

In doing so, this would align New Zealand with international best practice for protecting organic products, provide all customers and consumers with assurance and place us in the best position for international trade negotiations.

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Please keep me informed of development of this important work.

Yours faithfully

s 9(2)(a)

G D Taylor

From: Mt Cass Station <office.mtcass@xtra.co.nz>
Sent: Monday, 28 May 2018 1:11 PM
To: Organics Consultation
Subject: submission
Attachments: CCF28052018 00006.jpg

Follow Up Flag: Follow up
Flag Status: Completed

Categories: In database

To whom it may concern
Please find attached my submission.
Kind regards
Andrew Heard

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

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Andrew Heard

Operations Manager
Organic Farm Holdings Ltd

s [REDACTED]

9(2)

Re: s 9(2)(a) [REDACTED]

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

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Please keep me informed of development of this important work.

Yours faithfully

s 9(2)(a) [REDACTED]

Andrew Heard

s 9(2)(a)

From: Peter Foster <s 9(2)(a)>
Sent: Tuesday, 29 May 2018 5:30 PM
To: Organics Consultation
Subject: Organic Submission
Attachments: Organic Submission.doc

Follow Up Flag: Follow up
Flag Status: Completed

Categories: In database, To put in submission database

Dear Sir/Madam,

Please find attached our submission to support MPI's preferred changes to the regulations regarding Organics. And support the move to a National Standard.

Regards
Peter Foster
Operations Manager

Look at us (paste this into your browser):

<https://www.youtube.com/watch?v=-r0jwrJZWM4>



Botryzen (2010) Ltd
Site s 9(2)(a)
P O Box 5664
Moray Place
Dunedin 9058
New Zealand

s 9(2)(a)

www.botryzen.co.nz

Striving for Total Sustainability.

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This email is intended for the addressee only and contains confidential information which may also be privileged.

5 October 2018

Head Office
156 Frederick Street
Dunedin 9016
PO Box 5664
Dunedin 9054
Factory Site
21 Willis Street
Dunedin 9054

Peter Foster
Botry-Zen (2010) Ltd
Email: s 9(2)(a)

s 9(2)(a)

info@botryzen.co.nz
www.botryzen.co.nz

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

Botry-Zen (2010) Ltd fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports. In doing so, this would align New Zealand with international best practice for protecting organic products, provide all customers and consumers with assurance and place us in the best position for international trade negotiations.

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Yours faithfully

s 9(2)(a)

Peter Foster
Operations Manager
Email: s 9(2)(a)
Ph: s 9(2)(a)

From: Christine O'Connell s 9(2)(a)
Sent: Wednesday, 23 May 2018 8:26 PM
To: Organics Consultation
Subject: Consultation - from a customer's perspective
Categories: In database

To whom it may concern,

I understand you had a meeting in Dunedin recently to hear people's opinions regarding the formalisation of the labelling of organic food. I do accept that if organic food is to be exported it may have to be formalised to satisfy overseas buyers.

However, **please** don't put the growers, who already provide high quality produce to NZ customers, under the same regime. Exporting organic produce is a different business altogether from supplying to the domestic market. It would cost the organic domestic market growers more time and more money for no good reason. I am well satisfied with the way Organic Farm NZ audits their growers. What they do is more than enough to maintain high standards.

I fear that if domestic growers have to meet the same regulations as export growers it will stifle the numbers of small organic growers.

As a consumer, I want to see more organically grown produce, not less. Let's encourage organic growers rather than making it difficult for them. The system is working well as it is. They are providing healthy food at fair prices. Let me continue buying healthy food at fair prices from Farmers' Markets and other outlets. I salute the domestic growers.

Kind regards

Christine O'Connell

s 9(2)(a)

From: ohokawarren s 9(2)(a)
Sent: Wednesday, 23 May 2018 9:15 PM
To: Organics Consultation
Subject: Submission: would NZ benefit from having a new regulatory regime for organic production? survey

Categories: In database

1. Do you agree or disagree with the proposed scope? Are there any other products, for example aquaculture products, that should be considered? Please specify

Incorporating on farm nutrient recycling, free of GE and the emphasis on animal welfare although laudable are overshadowed by the general focus on the export sector and the potential for industrial scale production on food. Would it be too ambitious to include the objective to have 100% certified organic food production in NZ within the next 20 years eg? What about a regulatory system that captures an aspect that is distinctly NZ to distinguish it from other international regulatory systems? You come so close to the philosophical aspects of organics when you mention animal welfare, so how can we be confident MPI can incorporate more of this into its scope? Could it consider the positive effects of promoting organics to the population for health reasons and recommend to Government that they remove GST from the fruit and veges to encourage more consumption and increase demand for eg?

It is unclear where the regional and local food systems fit in with this regulation. Suffice to say that they operate under a certification system already in place. It is also unclear why you have chosen to not include within this scope cosmetics or aquaculture. The former being riddled with false organic claims.

2. To what extent do you agree with the description of the current context for organics? Please explain why

Yes I agree the popularity of organics may be on the increase by consumers hence the industry interest. Statistics on the number of industrial scale farms and the number of small farms and the number of privately owned organic businesses would help form a clearer context of the local market. There are also significant regional and local food systems that have operated in NZ for many years under the existing certified organic food system. Regulation has been relatively simple and in some instances unnecessary and this organic sector has not experienced any governmental funding or subsidies in the past to encourage any growth.

Of relevance too is the role that Farmers Markets have played in our food culture over the last decade. They have become part of many communities as a way of accessing food including organics. How food is distributed is an integral part of any food system or industry. Farmers Markets challenge the current food distribution networks which support Supermarkets. It has been claimed that many people associate farmers markets with organics much to the chagrin of the supermarket industry. Alongside the independent organic food retailers the farmers markets are more often than not the only places where organic is synonymous with authenticity because there is no middle man. This point is particularly relevant if you opt to adopt the USDA model which regulates the use of the word organic.

3. To what extent do you agree with the description of the current regulatory environment for organics? Please explain why

This perceived necessity for a more rigorous regulatory environment for organics appears to be as a result of requests from trading partners and an enthusiasm from industrial scale food producers and their industry distributors the supermarkets who stand to benefit from the increase in predominately processed food organic consumption.

Up until now the regulatory environment in the organic sector has not really differentiated between the industrial scale production of food and small business or regional organics. Certifiers like Biogro and Assure Quality and other smaller independent certifiers have served most regional organic food producers well.

However I agree that a more a rigorous and national regulatory system would create a consistency for the export industry and for those who produce food on industrial scale farms and the industry distributors. Once again I think you need to make this differentiation between two sectors; industrial/ processed and small business clearer in your proposal.

You do not mention Retailer Certification? Would this also remain an option for certification? If so, in the interests of integrity, I suggest that any retailer who does not stock 80% certified organic foods cannot claim organic status as an certified organic retailer. This protects those authentic organic businesses from being destroyed by the competitive all serving supermarket industry.

4. Do you agree that this is a good opportunity to change the way organics are currently regulated in New Zealand? In your opinion, what needs to change? Please explain why

This is an industry motivated call for regulation change. So when alluding to a good opportunity you are alluding to the opportunity of creating an organic brand for NZ.

However" a mandatory organic national standard" is long overdue. The risk is that MPI will follow suit with the USDA to meet with those specific regulatory regimes as requested by the trading partners. How you define Organic could either complement the trading partner's requirements or create a distinct NZ organic brand. I believe this is a good opportunity to do the latter.

With the increasing number of large scale farms and the increasing domination of supermarket on our food landscape and their role in the organic sector, I would like MPI to consider that the opportunity is also right for more rigorous regulation of these industries in particular to ensure the organic brand is not harmed or rendered down as is the case in the USA.

With your focus on export in the section I would like to remind you that the regional small scale local organic producer who is of significance culturally needs to be considered separately in any regulations and therefore be subject to a reduced regime of regulation.

5. Do you think that the appropriate objectives for a new organic regime have been identified? What would you suggest a new regime should achieve? Please explain why.

Your organic regime particularly suits an industry driven market consisting of industrial production, trade and export.

Confidence: Yes consumers will need assurance in organic certification in order to have confidence. Usually confidence corresponds with knowledge and understanding. Shoppers need information and education about Organics. Consider promotion of NZ organics on a national and regional level.

Integrity: When does MPI expect the place of origin regulation to take effect? This is an example of how to undermine consumer confidence.

What regulatory regimes will MPI have in place to closely monitor the industry distributors of organics with the aim to avoid any further food scandals involving the tactics of supermarkets and their suppliers?

I agree that the organic export industry could be at risk if you blindly follow the USDA for eg. How would you focus on enabling trade affect the content of the regulations? Do we adopt the USDA model and lose the opportunity to create our own NZ Organic Certification brand? How much compromise are you willing to make? Which industries in NZ are you listening to? You can use the USDA as an example of what not to do. What regulations will be enforce to ensure that the criteria for organic certification cannot be watered down as has happened in the USA by industries marketing organic products?

I consider that the existing certifying system has served small producers and retailers satisfactorily and the voluntary aspect of this certification has been adequate. I also think that the any confusion between the uses of the terms organic or certified organic comes down to education. If a product is certified organic it should have met required standards and if not certified there is no guarantee it is organic. I oppose the suggestion that the word Organic be regulated as is the case by the USDA. I would like to suggest that MPI consider as an objective making the difference between the two clear to consumers as opposed to regulating the word in its entirety. Establishing a NZ Organic Certification brand by way of a national regulatory system should also be an objective.

6. Do you think that a standard setting out requirements for production methods would be best suited to organic production? Please explain why.

Yes the production methods are important. But I am not sure you will be able to incorporate any of the organic philosophy in this commercial context. It is important that the legislation and regulations finally drawn up enhance the NZ organic certification and have integrity. Your definition of Organic could be put to the test if you consult with the wrong industry representatives are pressured by trade agreements. There is a wealth of knowledge in the existing organic sector.

7. Do you think that the correct options have been identified? Are there alternative option(s) that should be considered? Please describe.

I agree with 1c the Mandatory standard for all organic producers. But I suggest two level of this regime. One being for industry and retailers and the other for the small producers /food artisans who sell direct to the public. The scope of the business should be reflected in the fees. Regional or locally focussed certification systems exist now, so perhaps use existing certifying business for the small business? Certification should also be marketed in such way that it is a desirable outcome for producers and encourage more organic production of foods rather than just regulation.

8. Are there positive or negative impacts of any options that are not described? Please describe any impacts that we've missed.

Over regulation of small producers and associated fees would be unwelcome. From my market business perspective I oppose the regulation of the word Organic, the emphasis should be on the Certified Organic as legitimate. But I appreciate the fact that the climate of integrity and authenticity is not always as tangible in a supermarket.

9. If a standard became mandatory for all organic operators, what would be the positive and/or negative impacts on you or your business?

It would mean some producers would have to substantiate their organic claims or change ingredients and labels. Yet organic cosmetic claims can continue – this is odd.

Supermarket can sell more processed organics – this is a tragedy for consumers.

10. To what extent do you support or oppose the use of a logo to help distinguish organic products from non-organic products? Please explain why.

A logo that clearly says NZ is a good idea. But you should use the words Certified Organic.

11. Do you think that the correct options have been identified? Are there alternative option(s) that should be considered? Please describe.

I support the preferred option 2A on the understanding that the word organic is not regulated for commercial incentive and that the Certified Organic is set as the national standard.

12. Are there positive or negative impacts of any options that are not described in the above section? Please describe any impacts that we've missed.

There should not be any exemptions. By allowing exemptions you are undermining those who choose to be certified organic. Small business and farmers market organic producers who you mention as being likely candidates for exemptions are either already certified or would choose to be if they wanted to claim to be organic. If they were not organic and they use the word they would be subject to scrutiny by their customers and also by the operators of the markets. The scale of any false claims is tiny compared to the misleading labels found on supermarket shelves. You need to get a perspective here. This is a fundamentally different sales climate to a supermarket. By allowing exemptions you assist the supermarket industry to discredit competition which it does routinely. (Post USDA regulation of the word organic has resulted in numerous growers in the USA choosing to go 'Beyond Organic'. This means they do not have confidence in the certification process which has watered down regulations to meet industrial industry standards. They can't call themselves organic as the word is regulated but they are authentically organic. It does not stop them growing organic they simply brand their produce with other terms.

I agree that small businesses should be subject to a reduction of compliance cost and the audits should also reflect their size.

13. If ongoing verification (with limited exemptions) was used to check compliance, what would be the positive and/or negative impacts on you or your business? Reduced compliance costs and regulatory audits which reflect the size of the business would be more acceptable.

14. If some businesses were not required to be verified on an ongoing basis, what do you think the criteria for exemption could be? For example, method of sale, annual turnover, and volume sold others...

No exemptions. But perhaps consider farmers market participants and gate sales as being a criteria for reduction of compliance costs?

15. To what extent do you support this combination? Please explain why. I don't, my reasons are stated above.

16. What changes or impacts would this combination of options involve for you and/or your organisation? If you went ahead with exemptions we would self-monitor our non-certified organic growers and producers as we do now. So, no difference.

17. What would be your preferred combination of options? This can include any listed options and any other possible option not listed. No combination. Mandatory with reduced compliance costs for small and farmer's market business.

18. Have the powers required to implement a new regime been correctly identified? Are there any other components you think would be necessary? No

19. Do you have any comments on the range of proposed compliance and enforcement tools? No

20. Do you have any other comments about the proposed legislative settings? No

21. What evidence should be examined to inform further analysis of this proposal?

22. If you have any other comments or suggestions please let us know.

Please tell us a bit about yourself Understanding who you are will help us best understand your feedback and address any concerns you may have.

• Please select all those that apply to you. Are you... ☐ a business YES...

a. How many employees do you have? YES ☐ 2 ☐ 0 5 ☐ 6 10 ☐ 10 20 ☐ 20+

b. What activities, if any, does your business carry out in relation to organic products? YES ☐ produce organics YES ☐ sell organics in New Zealand ☐ process organics ☐ export organics ☐ store organics ☐ import organics ☐ provide contracted services in relation to organics ☐ other (please specify) Supports organic growers via farmers markets

c. What kind of products do you deal with? (please select all that apply) YES ☐ certified organic products ☐ uncertified organic products ☐ non-organic products ☐ non-organic products, but I intend to deal with organic products in the future

d. What type of products do you currently handle? (Select all that apply) ☐ Processed food and non-alcoholic beverages (organic), ☐ Processed food and non-alcoholic beverages (non-organic), ☐ Live animals and/or animal products (organic), ☐ Live animals and/or animal products (non-organic), YES ☐ Plant products (including fresh fruit and vegetables) (organic), ☐ Plant products (including fresh fruit and vegetables) (non-organic), ☐ Wine (organic), ☐ Wine (non-organic), ☐ Other (please specify product and organic status) e. Do you sell organic products... YES ☐ directly to consumers (e.g. farmers markets, gate sales) FARMERS MARKETS ☐ to a retailer or distributor (e.g. speciality shops, supermarkets) ☐ to a foreign customer (e.g. exports) ☐ other (please specify) and/or ☐ a consumer...

a. Do you purchase organic products? YES ALL THE TIME ☐ Yes, all the time ☐ Yes, sometimes ☐ No

b. To what extent do you consider the certification status of organic products that you buy and use? Quite important

24 • Would New Zealand benefit from new organic regulation? Ministry for Primary Industries and/or ☐ other... YES

- a. Please tell us who you are or who you represent (e.g. industry group, supermarket, service provider) I manage and own a 10 year old farmers market in Canterbury, a certified organic property and previously owned an organic grocery for 3 years
- b. What is your interest in organics? I would like to see more productive and diverse use of land by way of organic growers and producers supplying farmers markets. I would like organics to be more about the fresh and local as opposed to the processed and imported exported.
- c. Is there anything else you'd like to tell us that could help us understand your feedback? For example: size of your business, key markets, experience related to the organic sector.

Thanks

Barb Warren

From: ohokawarr@s 9(2)(a)
Sent: Sunday, 3 June 2018 11:07 AM
To: Organics Consultation
Subject: Submission
Categories: In database, To put in submission database

Hi

I am a certified organic vegetable grower.

I consider the following strategy should be adopted:

1. Regulate organic certification.
2. Prevent resellers from selling product using the word organic unless the word organic is combined with the word certified.
3. Allow producers to use the word organic if selling direct to customers.

The reasons are as follows:

Customers interested in organic food know the difference between certified organic and organic. If the use of 'certified organic' is replaced with 'organic' all the work educating citizens about certified organic will have been wasted.

Resellers, in particular supermarkets, have been willing to deceive customers by selling non-organic product as organic. Examples are eggs and dairy. Powerful resellers need to be regulated to prevent this practice. The problem is not with the producers. It would be a mistake to allow resellers to use the word 'organic' to describe 'certified organic' because that would diminish the meaning of the brand 'certified organic' and is likely to lead to a loss of integrity of 'certified organic'.

Integrity will always be most obvious where the producer is dealing direct with the customer. Resellers will never achieve this level of integrity. It is likely they will attempt to diminish the integrity of the whole organic system because they specialise in cheap food. They will require suppliers to scale up production and specialise in monoculture industrial scale production. In order to do this they will attempt to alter the interpretation of the regulations in particular with respect to bio diversity and animal welfare. This has happened in the USA. So do not give the resellers the use of the word 'organic' to describe 'certified organic'. This would be the first step in removing the difference between organically produced food and synthetic chemical produced food.

Also retailers should not be able to claim they are certified organic retailers unless their turnover is more than 75% certified organic.

Thanks for the opportunity to make a submission.

Regards,
Andrew Warren

s 9(2)(a)

From: Brent Barrett s 9(2)(a)
Sent: Sunday, 3 June 2018 11:10 PM
To: Organics Consultation
Subject: submission on Organic Standards

Categories: In database, To put in submission database

Hello

Thank you for the opportunity to submit on this matter regards the value of proper national organic standards in New Zealand.

I grew up in rural communities, my first paid jobs were on farms, I studied and earned an MSc degree in Crop Science, and have over 20 years research experience in cropping and pastoral agriculture in New Zealand and internationally.

I don't lead or contribute to research in the area of organics production, nor do I produce organics, but I do consume a range of organic foods when and where they are available and of quality.

I have no conflict of interest in this matter.

When I first moved to New Zealand (in 2000) I was very surprised to find how loosely the term 'organic' was used. So loose, that it severely undermines the potential value that NZ Inc could realise from its proper regulation and use.

My submission is that I strongly support the adoption of a single, enforceable national organic standard. Such a standard offers a ready way to achieve value add for agriculture in New Zealand, helping our domestic and export producers create value from the land. Please act now to adopt and promote a strong standard that is well recognised and contributes to a wider ability for the primary sector to demonstrate provenance. The standard should adapt and apply across horticulture, pastoral farming, cropping, viticulture.

Brent Barrett

s 9(2)(a)

From: Bob Crowder s 9(2)(a)
Sent: Sunday, 3 June 2018 3:34 PM
To: Organics Consultation
Subject: Submission on MPI Discussion paper No: 2018/09

Categories: In database, To put in submission database

Name. Robert A. Crowder

Address. s 9(2)(a)

Back Ground: Senior Lecturer Horticulture and Organic Systems at Lincoln University 1966 until retirement in 2000 and then on contract until the present.

Established the Biological Husbandry Unit [BHU] at Lincoln University in 1976 and keep a watching brief until the present.

A founder member of Biological Producers Council [Bio Gro] 1983. Chief inspector of farms and President Bio Gro in early years.

Elected onto Board of Directors I.F.O.A.M. in 1989 and re elected until 1999.

Convener of I.F.O.A.M International Organic Conference and Congress at Lincoln University in 1994.

My first reaction to the discussion paper No:2018/09 is one of congratulations for a job well done, you have obviously done your homework and the result is that you have come to the same conclusions that Biological Producers Council arrived at for the Bio Gro standards which in turn were based on those of I.F.O.A.M with much discussion with our counter parts in the Soil Association of the UK and indeed with N.A.S.S.A. in Australia. The history of CERTIFIED ORGANIC was initiated by these organisations way before the 1990's due to all those reasons outlined in the discussion paper. Much of the work was done in collaboration with the then N.Z. Ministry of Agriculture and thanks to them and their finance Bio Gro was able to be Accredited by I.F.O.A.M. as one of the top 6 Certified Organic agencies in the then world [1988] and indeed financed organic Australian participation at the NZ inspections to their advantage in establishing their own standards.

It is not my intention to go into the minutiae of the proposed National certified organic standards as you will receive many of those I have no doubt. Fundamentally the National Organic Standard must be compatible with the existing International Standard and in fact the existing Certification agencies do so at a high level of excellence. The value of the National Organic Standard is that it shows renewed Government support for the value of organic agriculture or land management within New Zealand as the pathway to tread. It fits in with the growing public interest not only in certified organic foods but also in environmental awareness and their growing awareness of the problems of industrial agriculture, bio security issues and bio diversity in general. It is also compatible with the policy to have NZ free of introduced pest species by 2050. In fact the continuing tourist policy to promote NZ as 100% Pure can only be benefited by such a move?

The preamble to any National Organic Standard should therefore have emphasis on this more holistic approach to the lands regeneration and even to the inclusion of forest plantings and harvest.

New Zealand also has the unique advantage of being isolated and free of free air GE contamination. This is likely to become of increasing importance as the environment becomes more GE contaminated and NZ could benefit economically from being totally GE free.

Another issue that has developed in latter years has been the acceptance of hydro ponics into some national organic standards. As bio fuels become more developed this area could well become a useful outcome within organic standards and needs an open mind for development.

The whole concept of organic production has been stymied by lack of education and appropriate research in NZ in particular. The initiative at Lincoln University back in 1976 to establish the Biological Husbandry Unit [BHU] and associated teaching up to Post Graduate level has furnished the organic systems with quite a lot of the leading people now in the Organic industry. It would be interesting to know how many now involved do in fact have a contact with organics through the BHU? Today despite the proven success of certified organic as a viable economic and environmental system inspirational courses are becoming less and less available and of course expensive.

Certification is also expensive but results in a system that is environmentally benign. Should certified organic land therefore still have to go through the time and expense of further investigations which are becoming mandatory as less holistic local environmental land management controls are implemented?

Once again, well done in getting these issues before the people and for Government interest in a National Organic Standard. I look forward to Government adding to this with a statement similar to that for pest elimination.

NEW ZEALAND CERTIFIED ORGANIC BY 2050 [hopefully well before that].

Good luck with your on going work, be strong as you will need to be so. BOB.

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s 9(2)(a)

From: Chris Henry s 9(2)(a)
Sent: Sunday, 3 June 2018 5:37 PM
To: Organics Consultation
Cc: s 9(2)(a)
Subject: Proposed NZ Organic Standard
Attachments: Submission re Proposed Organic Standards Final 3 6 18.pdf
Categories: In database, To put in submission database

Hi,
Attached is my submission regarding the creation of a New Zealand Organic Standard.
I was involved many years ago in the creation of what is now the 'BioGro' standard, and life has taught me many lessons since.
I would like to become involved in your processes, as the detail of a standard has such a bearing on future outcomes for growers – it really has to be right, first time.
Please receipt this submission, so I know it has hit the right spot.
Regards
Chris

Chris Henry
Henry Manufacturing Limited

s 9(2)(a)

www.henrymanufacturing.co.nz



Henry Manufacturing Limited
PO Box 12-015 Ahuriri
Napier

s 9(2)(a)

s 9(2)(a)

www.henrymanufacturing.co.nz

3 June 2018

Food and Regulatory Policy
Ministry for Primary Industries
PO Box 2526
Wellington 6140

By email: organicsconsultation@mpi.govt.nz

Re: Organic Standard Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

My name is Chris Henry. I am the owner/director of Henry Manufacturing Limited which develops and sells 'soft chemistry' agrichemicals in New Zealand, currently solely in the winegrowing industry. All products are BioGro certified. The contract manufacturing plant is also Biogro certified. We have some of these products registered in the US and these have OMRI certification.

Our business is successful, with our organically certified products competing directly against conventional chemistry because our products are based on science and data. We lead in aspects of plant protection technology and would like New Zealand to fully benefit from New Zealand's unique situation.

I have been involved with organic growing since 1984 when I owned a citrus orchard in Auckland and I have also managed the conversion of a vineyard to organic certification. I was on the BioGro board many years ago.

I understand the implications of many international organic standards as our products are registered overseas as well as in New Zealand. We meet many winegrowers and wine companies and understand how market access can be restricted as a result of the way the international organic standards work. I give an example of this in this submission.

I have read the full discussion document and I fully support MPI's preferred options which will lead to the development of an Organic Act and supporting regulations. This will include defining a mandatory, national standard that includes domestic, import and exports.

As a BioGro member, I received some guidance in the form of a submission template and a letter as to how members are encouraged to respond. I support this initiative to ensure that MPI receive as much feedback as possible.

However, it is likely that the statement below will be included in a number of member submissions if the template is used and I would like to make specific comment on it as that is where **my opinion differs**:

From the BioGro letter template - 'In doing so [ie developing an Organic Act], this would **align New Zealand with international best practice** [my emphasis] for protecting organic products, provide all customers and consumers with assurance and place us in the best position for international trade negotiations'.

We should not assume that current international standards represent best practice. While in most cases international standards agree with each other regarding general or guiding principles, many are simply flawed by specific rules that do not stand any scientific test or logic. This can cripple innovation and possibility of 'organics' being a truly sustainable and economically sustainable industry in the future.

I would also suggest that many people using the template supplied by BioGro, may not understand the implications of New Zealand aligning with international best practice. If asked directly most organic practitioners would wish for a New Zealand organic standard that does comply with international standards, but the New Zealand organic standard should be one that is appropriate and based on New Zealand's specific circumstances as most of the other international standards are. It makes absolutely no commercial sense for a New Zealand standard to be elitist in comparison with other countries.

Here are some examples

Example 1

I owned a citrus orchard in Auckland which, following the stand down period, was fully organically certified for 10 years. The orchard was a commercial operation with aims of exporting certified organic mandarins to Japan. It achieved this aim on only one occasion. While the organic orchard enterprise was able to produce to high cosmetic and phytosanitary standards, it was not able to produce at economic yields due to the fertility constraints imposed by the organic standard.

Growing organically is challenging so the organic standards for NZ need to ensure that restrictions are based on sound reasons.

Example 2

One of our products, Protector^{hml} is a potassium soap of a specific fatty acid complex and is registered as a fungicide (at a rate of 2%). It is also used as an adjuvant (at a rate of 0.5%). It has a restricted BioGro certification in that it is only allowed to be used as an adjuvant (with other approved BioGro fungicides) and denied certification as a fungicide.

This reason for this is because the NOP (US organic standards) only allow potassium soaps to be used as insecticides or herbicides their use as fungicides at time their standards were drawn up was not known or considered, and therefore as a fungicide Protector^{hml} falls outside the scope of their standards. Because the BioGro standards refer to the US standards, it also falls outside the scope for NZ. We are planning to petition the NOP for a change in this respect.

Additionally the adjuvant rate of 0.5% was based on data I supplied to BioGro as the most effective rate for spreading of Protector^{hml}. This rate of 0.5% is now used by BioGro as the maximum use rate of all adjuvants submitted regardless of chemistry.

The above should not be taken as a criticism of BioGro, but it is an example of the way 'rules' evolve within standards that have no or little basis in science or fact.

Example 3

Potassium silicate is a product that is very useful in gaining further fungicidal efficacy from the use of HML32 and Protector^{hml} and other organic fungicides. Silicates have a long history within organic food production, but have limited efficacy when used by themselves. Over several seasons, we have developed a potassium silicate product which is called HML Silco. It is not registered as a plant protection product, but marketed as an adjuvant and is BioGro certified.

Its use is allowable in all export market except Canada, where their standards do not include potassium silicate. Many winegrowers in NZ is not using the product because of the market restriction in Canada.


However, wines produced in the US where organically certified potassium silicate products have been used can be exported to Canada as organic. This is because Canada accepts equivalence of the US organic standard as their own. New Zealand organic wine growers cannot use potassium silicate and export to Canada because BioGro certifies to the Canadian standard directly.

I therefore fully support and urge good engagement on the development of the legislation, particularly in relation to the standards what will resolve the anomalies demonstrated by these examples.

I would welcome the opportunity to be involved in any working party that might be working on organic agrichemical inputs as standards are reviewed so I can make a meaningful input into any New Zealand organic standard.

Yours sincerely

s 9(2)(a)



Chris Henry

Henry Manufacturing Ltd

Kiara

MONDAY JUNE 4

WDN - RNZ SAYS 8 ORGANIC MEETS AROUND THE COUNTRY AND SUBS DUE JUNE 1TH. THIS WAS ON THE 22-15H OF MAY. BY THE END OF MAY ALL MEETS WERE FINISHED.

FYI - OUT HERE SOMETIMES MAIL + NEWS TAKES A WEEK OR SO, SOMETIMES LONGER, AND SOMETIMES NOT AT ALL.

THS ALL HAPPENED SO FAST ONE WONDERS ! ? X

I HEREBY REQUEST A FALC @ FALC WITH WHOM EVER @ MAKE A VERBKL SUBMISSION ON THIS PROPOSED ORGANIC BLANKET.

THANK YOU

SHYLOH CSO

HABITAT

S S
9(29C
(a)

HAWICKS BAY

FOOD POLICY "ORGANIC"
MIN OF PRIMARY INDUSTRIES
PO BOX 1526
WELLINGTON 6140

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#2-2018

From: jeanette fitsimons s 9(2)(a)
Sent: Monday, 4 June 2018 4:15 PM
To: Organics Consultation
Subject: organic regulation
Attachments: organic std sub.odt; signature.asc

Categories: In database, To put in submission database

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Submission to MPI on proposed organic regulation

From: Pakaraka Farm (OFNZ 1009) and Pakaraka Permaculture, s 9(2)(a)

Pakaraka Farm

We are a small farm on the Coromandel producing olives and olive oil, chestnuts and chestnut products, sheep and cattle. We have been using organic methods since we began in 1992. Most of the pasture, and the olives and chestnuts, have been certified with OFNZ and sold within NZ as “organic” since 2001. Sheep and cattle are raised organically but not sold as “organic” because they need to graze one area of pasture which cannot be certified.

Pakaraka Permaculture

Pakaraka Permaculture is an intensive market garden established in 2015 within the boundaries of Pakaraka Farm and grows intensive salads, vegetables and strawberries, all certified by OFNZ. It provides a livelihood for 4 people.

The OFNZ certification system

Both entities are certified by OFNZ, which was established to offer a robust and rigorous quality standard at a lower price than Biogro for small growers who did not need to be approved by IFOAM as they are not exporting. They sell into their local markets where individual farmers are known and trusted and reputations are a guarantee of honesty, along with the certification system.

We are members of the central Coromandel “pod” - a group of neighbouring farms who peer review each other according to the standards developed for Biogro, and recommend certification status, which is then audited on paper by a qualified auditor. All farms are visited by the auditor on rotation every few years.

What do we need?

We do not need a new system imposed on top of this by MPI. The extra costs would put many of us out of business. (Already some of us are under severe stress from the compliance uncertainties and costs of the Food Act. While we are more than willing to ensure our food is safe, and believe we already do, the costs and complexities of the system are too much for small enterprises.)

What we do need is protection from growers using the label “organic” with no evidence or certification at all, to undercut our products. This currently takes two forms:

1. Some growers think that because they don't spray their products while growing, they are organic. They label their products “organic” when they pay no attention to soil health and fertility, and may use herbicides around fruit trees. This may be largely ignorance but it devalues our genuine organic products.
2. We know of others who knowingly buy produce from the general markets and sell under the label “organic” at street markets alongside genuine organic products. This is fraud and we would like some protection from it legally.

Here is just one example from our recent experience:

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These people were at the same market as our own stall and claiming they were the only organic produce at the market. They use Neem oil which is a restricted input for which a certified grower needs to get permission in their particular circumstances; and they have not been certified by anyone as to the processes they use. They are also hydroponic which is not an organic method of growing.

What do we want to see happen?

1. We would like the current certifiers – Biogro, Demeter, OFNZ, Hua Parakore, Assure Quality, to continue to be available and to need no further standard on top of them. Instead we would like MPI to publicly back the existing standards.
2. We would like the claim “organic” to be protected and only to be used on products certified under one of these systems, or if originating from overseas, under a system accredited by IFOAM. Organic products should be required to state the accreditation system they use, and their personal number, as Pakaraka Farm already does.
3. Compliance would not be difficult. They either have the certificate or they don't. The certifying organisations all have their own auditing systems to check quality. Those who wish to claim organic status but are not certified can use another label such as “spray free” (as some already do) and consumers can choose to take them on trust or not.
4. We would not recommend MPI spending money on spot checks on those not displaying their certification number. Instead publicise a contact email or phone number for people to notify breaches. Consumers and other producers will soon notify examples of misuse of the word organic, as in the example above. If markets exclude growers found to be using the term organic falsely that may be all the enforcement required. Otherwise the Sale of Goods Act would presumably apply if the term organic was protected.

Thank you for the opportunity to comment.

Jeanette Fitzsimons; Harry Parke; Niva Kay; Yotam Kay

From: Catriona and Mark White s 9(2)(a)
Sent: Tuesday, 5 June 2018 6:44 AM
To: Organics Consultation
Cc: Liz Espin
Subject: Submission from COKA for organic consultation
Attachments: COKA Submission on MPI Organic Proposal May 2018.pdf
Categories: In database

Hi there

Please find attached our submission.

Thank you for the opportunity to participate in this process.

Kind regards

Mark White
Vice-chair COKA

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New Zealand Certified Organic Kiwifruit Association
PO Box 330
TE PUKE 3153

4th June 2018

Dear Ministry for Primary Industries

Re: Organic Consultation

Thank you for the opportunity to respond to your consultation on whether New Zealand would benefit from an organic regulation.

The New Zealand Certified Organic Kiwifruit Association (COKA) was established to foster and encourage the production of Certified Organic kiwifruit for export and domestic supply. Membership of the association includes growers and suppliers of certified organic inputs and services. Currently all of our organic kiwifruit is certified by BioGro, and is exported and marketed throughout the world by Zespri International Limited. Certified organic Kiwifruit marketed by Zespri accounted for over \$60 million of export earnings during the past year.

The following is COKA's submission in response to the MPI document "Would New Zealand benefit from new organic regulation?" MPI Discussion Paper No:2018/09.

Proposal	COKA Submission
Part 1:1	Agree
Part 1:2	Agree
Part 1:3	Agree
Part 1:4	Agree – regulation needs to be introduced to give consumers confidence that they are purchasing reputable organic produce.
Part 1:5	Agree with objectives – also include any equivalencies for organic exporters.
Part 2: 6	Agree – transparency of natural production processes is what consumers are purchasing when they purchase certified organic produce.
Part 2: 7	Yes – this document contains the reasonable options for consideration.
Part 2: 8	Implementing a mandatory standard may reduce overall certification costs as it may reduce the level of international assessment of the current certification processes.
Part 2: 9	Expectation is that all current certified organic license holders will meet the new standards and that there will be no negative impacts.
Part 2: 10	The development of a national logo needs to be carefully assessed to ensure all risks associated are given due consideration.

Part 2: 11	Yes – correct options have been identified.
Part 2: 12	No other impacts.
Part 2: 13	COKA maintains that small businesses are required to meet the standards if they are to be selling certified organic produce or products. New Zealand cannot afford to have any consumers losing trust in the overall organic certification process and protection of New Zealand's organic standards for all producers whether large or small in size is paramount. COKA supports the option being made available for those smaller businesses to join an organisation like Organic Farm NZ who will provide a more cost effective certification option.
Part 2: 14	See Part 2:13.
Part 2: 15	COKA supports 1C mandatory compliance for all relevant businesses. COKA supports 2C ongoing verification, with limited exceptions as outlined in Part 2:13.
Part 2: 16	Currently organic kiwifruit growers who export their crop are certified to BioGro standards, and the expectation is that these changes have little effect on the current standard being achieved by growers, and on the current standard being met by others involved in the industry (suppliers of inputs, processors, logistics, wholesalers, retailers).
Part 2: 17	Preferred option is as Part2:15

COKA supports MPI's efforts with this consultation process which will lead to the development of an Organic Act and supporting regulations.

Our organisation strongly supports putting in place international best practice for protection of organic products, in order to provide all consumers with assurance. We also support this process in order to improve New Zealand's position for international trade negotiations.

COKA wants New Zealand to put in place appropriate organic legislation, and believe that it would have a positive impact for all of New Zealand by:

- Protecting the term and use of organic
- Providing security for those seeking to invest
- Assisting with the provision of other environmental claims
- Aligning New Zealand's strategic direction as a country that provides value to quality products.

With a well-designed regime, all those who wish to become organically certified can do so, regardless of scale.

Please keep us informed of development of this important work.

Yours faithfully

s 9(2)(a)

Mark White

Certified Organic Kiwifruit Association Vice-Chair

‘NZ CERTIFIED ORGANIC’ KIWIFRUIT GROWERS ASSOCIATION P.O BOX 330 TE PUKE 31 53

From: Rolf Ora Ora Retreat <s 9(2)(a)>
Sent: Monday, 4 June 2018 5:37 PM
To: Organics Consultation
Subject: Submission: Would NZ benefit from new organic regulation?
Attachments: Organics Consultation Submission final.pdf

Categories: In database, To put in submission database

Dear Sirs,
enclosed please find my submission: Would NZ benefit from new organic regulation?

Kind regards
Rolf Mueller-Glodde

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To: Ministry of Primary Industries, Food and Regulatory Policy,
organicsconsultation@mpi.govt.nz

From: Ora Ora Retreat, Inge Bremer & Rolf Mueller-Glodde

Address: s 9(2)(a)

Contact: contact@oraoraretreat.co.nz s 9(2)(a)

Re.: Submission Would NZ benefit from new organic regulation?

Thank you for this initiative, for which we have been waiting for 15 years, and thank you for this opportunity to submit our views.

Tell us a bit about yourself

Business:

Ora Ora Retreat with certified organic gardens for vegetable, herbs, fruit, tea condiments

Additionally, we used to operate a certified organic orchard with fruit and vegetables

We are engaged in numerous voluntary conservation groups such as GE-free Northland, Far North Organic Growers, Vision Kerikeri, Carbon-Neutral Kerikeri, Forest & Bird, Transition Towns, Green Party

- a. 0 employees
- b. produce organic vegetable, herbs, fruit, tea condiments for own and guests' consumption and some local sales
- c. certified organic products
- d. plant products (organic)
- e. directly to consumers, manufacturers (tea) and speciality shops

Consumer:

- a. yes, most of the time
- b. extremely high

Which organic products are we interested in

Q1: do you agree or disagree with the proposed scope? Are there any other products, for example aquaculture products, that should be considered? Please specify.

A1: Aquaculture products, like seaweed, fish, and molluscs should be considered additionally if MPI can ensure that clean water, clean and organic food are used in a sustainable, certified organic environment in which marine life can prosper and reproduce. There are definite health benefits for the consumers of organic aquaculture products: NZ soil is notoriously deficient in Selenium, which is abundant in seafood (including seaweed).

Additionally, cosmetics and hygienic products should be included in the "new organic regulation" - similar to Australia. Whether products are eaten or used on the body: consumers want to be sure that the products they purchase comply with the organic standard. In fact, even (cotton) textiles should be included to avoid false labelling: why stop at including wool?

Demand for organic products is increasing

Q2: to what extent do you agree with the description of the current context for organics? Please specify.

A2: Yes, the growth trend for organic product demand is exponential and will remain so, \$217m domestic sales and \$280m exports in 2015 and it is likely that this growth will already have increased significantly by now, June 2018. The Ministry of Statistics should be empowered to collect more data more frequently and include the organic status of imported goods (in cooperation with Customs). Increased production of more certified organic goods will lead to 1. improved health domestically, 2. increased exports at higher prices, 3. increased value/image for conscious tourists and immigrants, 4. reduced impact on land and water resources, 5. increased GHG sequestration. With it's geographical location New Zealand is in a unique situation to remain GE-free and become organic throughout (like Denmark plans), which will enhance the a.m. points.

The regulatory environment for organics

Q3: to what extent do you agree with the description of the current regulatory environment for organics? Please explain why.

A3: Principally, the restricted use of "100% organic", "organic" or "made with organic ingredients" should be mandatory in NZ like in regulated markets. To this effect, official organic certification by an accredited certification company/society and/or an official MPI assurance program is a must for all organic producers.

While the list of "private standards referring to organic principles in NZ" might be complete, the list of logos respectively certification companies/society is not: e.g. Far North Organic Growers (FNOG) is a members based incorporated society, which offers certification based on BioGro standards to small local growers who supply their goods mainly to local markets and shops. There might be other such groups, which help to provide confidence for buyers of organic produce at a low cost for the producer.

All verifying businesses/societies should be required to be accredited by MPI for their work based on the new standard. It should not be necessary for MPI to take over the audits. If it is deemed necessary to conduct additional random spot checks by MPI, the associated cost should not be passed to the producers/businesses: such organic policing should rather be similar to the Police's job for law and order, which is paid for by the Government.