

s 9(2)(a)

From: Graeme Crawshaw s 9(2)(a)
Sent: Monday, 11 June 2018 9:06 AM
To: Organics Consultation
Subject: FW: submission on organic regulations
Categories: In database

From: Graeme Crawshaw
Sent: Monday, 11 June 2018 9:05 a.m.
To: 'mailto:organicsconsultation@mpi.govt.nz' <mailto:organicsconsultation@mpi.govt.nz>
Subject: submission on organic regulations

Mr Graeme Crawshaw

Kairanga 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 have been producing Kiwifruit since 1986 and have been certified organic since 1994. I currently produce Organic Sungold kiwifruit on my 8 hectare property in TePuke.

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

s 9(2)(a)

From: Karen Titulaer s 9(2)(a)
Sent: Monday, 11 June 2018 9:19 AM
To: Organics Consultation
Subject: Response to the Organic regulation discussion paper
Attachments: 2018-06-11 Villa Maria Consultation response.pdf

Categories: In database

Hello,
Please find attached our response to the Organic regulation discussion paper.

Kind regards

Karen Titulaer | Business Sustainability and Risk Manager
118 Montgomerie Road, Mangere, Auckland 2022
s | E s 9(2)(a)



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VILLA MARIA

NEW ZEALAND

Food Policy
Ministry for Primary Industries
PO Box 2526
Wellington 6140
New Zealand

11th June 2018

To whom it may concern,

Re: Organic Regulation, MPI Discussion Paper No. 2018/09

Villa Maria has been on a sustainability journey since the 1990s. We made the decision to begin farming organically in 1999 with an initial ambitious 80 hectare development. We received our first Biogro Organic Certification for 21 hectares of this vineyard in 2007. We have since invested in expanding our organic production with approximately 30% of Villa Maria owned vineyards currently certified organic.

For us organic production is about the health of our land. The return is high quality grapes from which we can produce premium quality wines.

We invest in Biogro certification of our organic processes from vineyard to winery and bottling facilities because we believe accreditation provides confidence amongst our customers when they purchase our wines. New Zealand's wine industry will not be successful competing globally on volume and so positioning New Zealand wine as a premium brand that consumers can trust is critical.

For this reason, we broadly support the introduction of organic regulations. We appreciate the opportunity to contribute to this discussion. Our feedback on the discussion document is provided below. Given the importance of this topic, we support continued engagement with industry in developing and maintaining organics regulations.

Part One:

The meaning of organic can be more accurately represented as produced without any use of artificial inputs. It is a holistic approach to farming where the health and diversity of the entire ecosystem is central producing quality produce and products.

The discussion paper accurately represents the current organics sector and arrangements for organics. We agree with the objectives stated for an organics regime.

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Part Two:

We agree that meeting the requirements of an organics standard should be mandatory for all organic producers, however we believe that ongoing verification should also be a requirement for all organic producers.

Over the years we have invested heavily in building our organic expertise and processes and developing a market which appreciates organic wine. We value the trust our consumers put in us. Introducing an appropriate mandatory standard would help to protect our investment and our customers from those who may use the term 'organic' without having adequate organic procedures in place.

Exemptions to verification requirements could cause confusion and reduce consumer confidence. It could also increase the risk of abuse from operators who may wish to avoid compliance with the standards.

We understand the need to manage costs to prevent barriers to entry into the market. There are ways the cost for smaller producers can be managed, for example, a reduced verification cycle based on volume or a reduced scope certification. Those small scale producers who choose not to obtain certification could use terms such as 'spray free' or 'free from synthetic sprays', depending on their practises.

We would support the use of a logo to help distinguish organic products on the basis that organic producers are free to choose whether they use that logo or the existing logo of the certifiers. We have invested in building consumers understanding and recognition of the Biogro logo and may prefer to continue using it.

Part Three:

We have no comments on the proposed features of the empowering legislation.

Part Four:

The discussion document does not go into detail on how the proposed organics standard would be developed. It is important that the standards are an enabler that provide a good base for growth of the organics industry and do not inhibit the industry. Key points to consider are:

- The standards need to be practical and able to be applied by organic producers on a daily basis
- The standards need to meet the expectations of export markets
- The standards need to be strong enough not to be open to abuse
- For those organic producers who have been meeting organics certification to date, the standards should not require changes to the way they operate.

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To ensure the standards meet these points we strongly advocate:

- a working group to be formed including industry representatives
- the working group input into the development of the standards and approve the draft standards
- the draft standards are consulted on with industry

We hope that you find this feedback helpful. We would be happy to input further as the approach to organics regulation is developed. If you have any questions regarding the information and feedback provided please contact me on s 9(2)(a)

Yours sincerely

Fabian Yukich
Executive Director

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s 9(2)(a)

From: ursula bil teitink s 9(2)(a)
Sent: Monday, 11 June 2018 10:21 AM
To: Organics Consultation
Subject: Submission Would New Zealand benefit from new organic regulation?
Attachments: Submission Letter LFC.pdf

Categories: In database

Dear Sirs, Madams,

Please find attached my submission Would New Zealand benefit from new organic regulation?

Please keep me informed of the development of this important work.

Warm regards,



Ursula Bil-Teitink

Email: s 9(2)(a)

Mobile: s 9(2)(a)

Website: www.localfoodconsultancy.com

Facebook: Local Food Consultancy

Local Food Consultancy - 1078 Plymouth Rd, RD4, New Plymouth 4374

New Plymouth, 9 June 2018

Re: Organic Consultation – Would New Zealand benefit from new organic legislation?

Dear Sirs, Madams,

First of all I would like to thank you for the opportunity to be able to give feedback on your consultation on whether New Zealand would benefit from new organic regulation. The documentation is well written and it explains clearly, step by step, the options and reasons behind the preferable options.

I also would like to take the opportunity to thank OANZ and the wider organic community for the extensive work they have put in to come to this stage. This consultancy process whether New Zealand would benefit from new organic regulation is a huge milestone for the organic sector in New Zealand.

Local Food Consultancy provides project management, consultancy, coaching and training to businesses in the specialty and niche food sectors, in the field of marketing, organic & food safety compliance, market development and sales.

- Listed on MPI's Food Safety Programme and Food Labelling List.
- Approved service provider for Regional Business Partner Network.
- Certification Manager OFNZ Taranaki/Whanganui / opt in NCC OFNZ.

I, Ursula Bil Teitink – Local Food Consultancy 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 export markets.

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.

I support the idea of regulation and of a mandatory single national organic standard to act as the legal baseline for what is called "organic". The mandatory single national organic standard should in my opinion be recognized by IFOAM and set up conform IFOAM principles.

The new mandatory organic standard should cover the domestic market, export markets and imports. However, I do feel that we need to look at how we regulate domestic market, exports and imports. It could be that we need to allow for some adaptations in legislation specific to domestic market, export markets or imports in order to allow expansion and increase in volume in line with the demand in organics for both domestic and export markets.

"By 2015, The New Zealand's organic sector was worth approximately half a billion dollars: \$217 million domestic market and almost \$280 million in exports."

Our domestic market is of an immense importance; 44% of organic volume in New Zealand is within the domestic market. To meet the growing demand in organics domestically and in export markets we need to:

- support existing small scale food producers and processors to grow their businesses (scale-up) and
- encourage people who pursue a career in organics to start up small by utilizing land for growing and processing food using organic production methods and to scale up in time.

A low entry organic certification system is of immense importance to achieve above. Small scale businesses are a pathway to future growth. Successful export products are not built in an instance; it takes time to come to a scalable export volume. In my opinion New Zealand has the ability to be the leader in successful small scale farming practises.

Currently Organic Farm NZ (OFNZ) provides a low entry organic certification system. OFNZ is a not-for-profit organisation. The aim of OFNZ is to increase the community's understanding of organic principles and the practise of organic gardening and farming in New Zealand. OFNZ provides organic education and organic certification for the domestic market only. OFNZ is a recognised Participatory Guarantee System (PGS) Initiative with the International Federation of Organic Agriculture Movements (IFOAM).

For the reasons above I support a third party certification as well as Participatory Guarantee Systems (PGS). For domestic market only I would like to see that a Participatory Guarantee System (PGS) will be included as one of the conformity assessment systems permitted under the new organic regulation. The main reason for this is that we need to encourage the adoption of organic practices and expand the organic sector to meet demand. Operators certified through such approved PGS should be allowed to make organic claims, use the national organic logo or alternate mark, and benefit from other kind of supports granted to organic production systems and marketing. Within the PGS system there is support for learning and education, a collaborative way of working is encouraged. This will strengthen local communities, increase (local) food security, and enable to be a building platform for larger enterprises in future.

In the Taranaki region we see a trend that people are using organic production methods but unfortunately choose not to go through the organic certification process. We need to be careful that we are not pushing people away into "self certified systems" to avoid certification cost. Another verification cost small scale horticulture operators are to take on from November 2018 onwards is the registration and verification cost with regard to Food Act 2014 when their scope of operation is beyond farm gate sales and sales at Farmers Markets.

For consumers it's important that they can trust that a product they buy is organic (organic certified). For producers and processors it's important that they are recognised for the extra work that they put in their production system and that they are protected from unfair competition from those practicing deceptive organic labelling.

I clearly see here opportunities to bring together Food Act 2014 requirements and organic production system requirements together in the PGS system (OFNZ). The challenge is to find a way to make compliance for small scale producers, simple and effective in time, performance and cost.

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

Summary of proposals:

1c A mandatory single national organic standard for all organic operators

- Recognised by IFOAM and set up conform IFOAM principles.

2a Ongoing verification for all

- Third party certification as well as Participatory Guarantee Systems (PGS) for domestic market only.

Please keep me informed of the development of this important work.

Yours faithfully,

Ursula Bil Teitink Local Food Consultancy

s 9(2)(a)

s 9(2)(a)

From: Caroline Blewitt s 9(2)(a)
Sent: Monday, 11 June 2018 10:30 AM
To: Organics Consultation

Categories: In database

The ones used now are fine, however if the produce is said to be organic it should have to have a proven organic label on it, not just a growers word sadly

C Blewitt,

s 9(2)(a)

Sent from [Mail](#) for Windows 10

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From: Zack Domike s 9(2)(a)
Sent: Monday, 11 June 2018 11:38 AM
To: Organics Consultation
Subject: Submission to consultation on the topic "Would NZ benefit from new organic regulation?"

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

Thanks for the opportunity to comment on proposed regulations.

MPI must be vigilant to approach new organics regulations from a consumer's point of view, rather than the predominant contemporary focus for proprietary technologies developed by investors who then expect a recurring financial return on their investment.

I am concerned because your proposal stands without references to important but missing keywords including: "agro-ecology", "soil", "soil foodweb", "humus", "organic matter", "seaweed", "micro-biome" or "manure", the MPI organics document lacks basic terminology about practical and scientific issues related to 'organic' production systems and standards.

MPI food safety advisors could be asking questions about antibiotic resistance effects in soils treated with common herbicides (including Glyphosate, Dicamba, and 2,4D), and how best to minimize inherited effects in soil biota during transition to 'organic' certification. How will MPI's proposed new regulations apply to the provenance and certification of microbial inputs, probiotics or other beneficial 'Effective Microorganisms'?

I overheard a remark from another attendee at MPI's Nelson consultation meeting: "Industrial chemical, agro-chemical and pharmaceutical farm products are currently subsidised by both the environment, (e.g. excessive nutrient leaching, eutrophication of waterways), and also subsidised by public health costs of constantly consuming agrichemical residues in our foods." Glyphosate is patented as an antibiotic, so kills soil bacteria, as well as gut bacteria.

Zack
Domike
s 9(2)(a)

s 9(2)(a)

From: Rebecca Clarkson s 9(2)(a)
Sent: Monday, 11 June 2018 11:57 AM
To: Organics Consultation
Subject: AQNZ comments on MPI organics proposal
Attachments: AQNZ Submission to Organics Regulation Proposal.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

Good morning, please find attached the Aquaculture New Zealand comments on the MPI discussion paper 'would New Zealand benefit from new organic regulation'.

Kind regards, Rebecca

Rebecca Clarkson | Environment Manager | Aquaculture New Zealand

s 9(2)(a)

www.aquaculture.org.nz | www.aplusaquaculture.nz



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**Aquaculture New Zealand Feedback on:
MPI Proposal to Regulate Organic Production**

11 June 2018

organicsconsultation@mpi.govt.nz

1.0 Introduction

- 1.1 Thank you for the opportunity to comment on the MPI discussion paper 'would New Zealand benefit from new organic regulation'.
- 1.2 AQNZ represents the interests of the aquaculture sector in New Zealand. This sector has export earnings in excess of \$400 million and a growth strategy with a goal of reaching \$1 billion per year in sales by 2025. Aquaculture directly employs more than 3,000 people primarily in regional communities.
- 1.3 Maori investment makes up a significant proportion of the current ownership of the industry and their role is expected to grow as aquaculture settlements deliver 20% of any new development to local Iwi. This creates both cultural and economic benefits, particularly in the regions.
- 1.4 The new Government¹ has identified aquaculture as a key opportunity for regional growth, and that development in the regions is important for social, economic and cultural wellbeing and for the benefit of New Zealand as a whole.

2.0 Organic Aquaculture

- 2.1 Organics is a key element of the industry's future growth potential, particularly in European markets². Currently a small number of mussel and oyster farms are certified organic with their primary markets being offshore rather than in New Zealand. However, expanding our offering both at home and overseas would support a number of the key pillars of our growth strategy. Organic aquaculture certification can provide a suite of benefits, creating up to 20% additional value to existing products, offering the industry opportunities in emerging and higher value markets, supporting the industry's commitment to responsible stewardship and very importantly promoting local support for the industry's activities and benefits within New Zealand³.
- 2.2 New Zealand aquaculture products sold as organic in New Zealand are already certified to either the BioGro orASUREQuality standard, so there are no real barriers to the industry meeting a

¹ New Zealand Labour Party and New Zealand First (2017). Coalition Agreement

² Institute for Food and Resource Economics (IFRE) (2017). Market conditions for organic aquaculture: market and price analysis

³ Colmar Brunton (2014). Public perceptions of New Zealand's aquaculture industry 2014.

proposed compulsory standard. Our real challenge is maintaining and increasing recognition in international markets.

- 2.3 Up until 2016 the industry was accessing the European Union (EU) market through AsureQuality's accreditation, however that has since lapsed and the only choice currently to access the EU is to bring certifiers out from other countries who do still have that accreditation. This brings an obviously substantial additional cost. Some other markets will still recognise the IFOAM accreditation that AsureQuality and BioGro both have.
- 2.4 Aquaculture New Zealand wrote to MPI in 2016 seeking inclusion in its Official Organics Assurance Programme (OOAP) – particularly focussing on China and the EU in the first instance. We noted that inclusion in the MPI OOAP would provide valuable opportunities for the aquaculture industry to enter new markets and add competitive advantage over similar products from other countries. The Irish Department for Food, Agriculture and the Marine has a strategic plan⁴ which notes that '*organic certification has proven to be a definite benefit in terms of raising market awareness and stabilising price*'.
- 2.5 We noted also that the OOAP would also assist to address existing market access issues as there is a risk of loss of access due to AsureQuality exiting from the EU recognition programme.
- 2.6 We continue to encourage MPI to make progress on the OOAP. However, we also view it as imperative that aquaculture is included in any regulation that is developed in New Zealand. Leaving aquaculture outside of the proposal would unfairly widen the organic 'market gap' between aquaculture and other New Zealand primary products.

3.0 Responding to the MPI Proposal

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

As highlighted above, we submit that aquaculture products should be included in the scope of the proposed new standard. There is strong potential for growth in the organic aquaculture market both in New Zealand and overseas, aquaculture is already well placed to be certified organic, and it would be unfair to arbitrarily leave aquaculture out of the scope.

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

We agree that production and demand is growing worldwide for organic products including for aquaculture products. We note that aquaculture now provides at least half of the world's seafood⁵ and that, coincidentally our products also meet the demand identified in the discussion paper for 'paleo, protein and dairy free'. Again, it is important aquaculture is included in the scope.

⁴ Department of Agriculture, Food and the Marine (2014). *National Strategic Plan for Sustainable Aquaculture Development*.

⁵ Food and Agriculture Organisation of the United Nations (FAO)(2016). *The State of World Fisheries and Agriculture*.

Question 3. To what extent do you agree with the description of the current regulatory context for organics?

We agree that obtaining a copy of the New Zealand Standard 8410 – Organic Production is cost prohibitive. We agree that IFOAM accreditation may help an organic standard to have international recognition but that this does not apply to all countries. We also agree that a critical mass of demand is necessary in New Zealand in order to justify certifiers becoming accredited to standards and submit that regulating organics in New Zealand will assist this context by smoothing the overall cost across all organic producers.

Question 4. Do you agree that this is a good opportunity to change the way organics are currently regulated in New Zealand?

We agree that, if aquaculture is included, there is a good opportunity to put New Zealand in a better position to negotiate new and more secure market access in the future. It will be imperative that MPI's market access programmes are appropriately resourced and incentivised to ensure that this opportunity is realised.

Question 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?

We agree with the five objectives identified and submit that it is important that a new regime meet all of the objectives equally well as each would not be sufficient in isolation.

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

Current organic aquaculture standards are process/production based rather than outcome based, and we agree that any New Zealand standard across organic products should be the same.

Question 7. Do you think that the correct options have been identified for Issue 1? Are there alternative option(s) that should be considered?

We agree that all reasonable options have been identified.

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

The positive and negative impacts of the options are well described.

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

Providing the standard was well aligned with the current organic aquaculture standard and the cost of certification was reasonable and fair then there would be no negative impacts. The positive impacts would result from the way that MPI would then align its trade support and market access activities with the new standard.

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

In order to have real value for aquaculture any logo would need to be supported by comprehensive communications and education in order to ensure recognition within New Zealand and overseas. The logo should also be supported with related messaging/information to assist organic producers to portray a consistent message across the organic industry.

Question 11. Do you think that the correct options have been identified for Issue 2? Are there alternative options that should be considered?

We agree that all reasonable options have been identified.

Question 12. Are there positive or negative impacts of any options that are not described in the above section?

The positive and negative impacts of the options are well described.

Question 13. If ongoing verification (with limited exceptions) was used to check compliance, what would be the positive and/or negative impacts on your or your business?

Providing the standard was well aligned with the current organic aquaculture standard and the cost and frequency of verification was reasonable and fair then there would be no negative impacts. An additional suggestion is that verification requirements could be scaled back after a period of years of full compliance in order to serve as more of a spot-check and reduce costs further. However, it will be important that the verification framework is in line with organic requirements in our overseas markets.

Question 14. If some business were not required to be verified on an ongoing basis, what do you think the criteria for exemption should be?

The criteria for exemption should include that the products are being sold in New Zealand in order not to undermine the integrity of the scheme in international markets.

Question 15. To what extent do you support the preferred combination of mandatory compliance and ongoing verification with limited exceptions.

We support the preferred combination in principle. The details of the standards, verification, certification, accreditation, costs and market access issues may or may not impact this preference.

Question 16. What changes or impacts would this combination of options involve for you and/or your organisation.

Providing the standard was well aligned with the current organic aquaculture standard and the cost and frequency of verification was reasonable and fair then there would be no additional changes or impacts to our current aquaculture operators.

Question 17. What would be your preferred combination of options?

Our preferred combination of options is as described. As noted above a strong level of Government support will be needed to ensure the proposals work well in practice. We submit that consideration should be given to providing seed funding to support businesses entering into the programme as this would enhance uptake therefore spreading overhead costs across a wider group of producers.

We note that organic production aligns in principle with a number of the Government's environmental and regional development aspirations and that this should be valued accordingly. Cost recovery mechanisms should also take into account these wider benefits to New Zealand.

It will also be important that industry is consulted in good faith during the development of the standards and the wider framework.

Question 18. Have the powers required to implement a new regime been correctly identified? Are there any other components you think would be necessary?

The powers required have been appropriately identified. We submit that the new Act should include a broad purpose which recognises the wider benefits to New Zealand of increasing organic production.

Questions 19 & 20. Do you have any comments on the range of proposed compliance and enforcement tools or legislative settings?

No further comments.

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

A comprehensive economic analysis of New Zealand's opportunity as a niche organic producer in world export markets should be undertaken. This should include opportunities for regional growth and job creation within New Zealand and should be used to inform discussions around value, costs and cost recovery.

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

Aquaculture New Zealand requests to be included in further consultations on the proposed organic regulation as they arise.

Yours sincerely,



Rebecca Clarkson
Environment Manager

Caroline Hoekman (Caroline)

From: Emily Duncan <s 9(2)(a)>
Sent: Monday, 11 June 2018 12:04 PM
To: Organics Consultation
Subject: Retail NZ Submission on New Organic Standards
Attachments: Organics Consultation Submission.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

To Whom It May Concern:

Please see attached Retail NZ's submission on a new organic standard regulation in New Zealand. Please feel free to contact me, or our CEO Scott Fisher, should you require any further information.

Kind regards,

EMILY DUNCAN
POLICY ADVISOR

Retail ^{NZ}

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11 Jun 2018

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

By email: organicsconsultation@mpi.govt.nz

To Whom It May Concern;

SUBMISSION ON NEW ORGANIC REGULATION FOR NEW ZEALAND

Retail NZ is a membership organisation representing the interest of New Zealand's retailers. We have around 4,000 members nationwide, ranging from small family-run stores through to major retail chains, including businesses across all retail categories. Together, our members account for around two-thirds of New Zealand's total retail turnover.

A number of our members sell organic products that either they produced themselves or are supplied to them by other producers. These products include food, beauty products and clothing to name a few. The current lack of a standard means that many similar products are likely produced differently, but that is often unclear to the consumer.

We are writing to make some comments on MPI's proposal for a new organic standard in New Zealand. We submit that it is important for New Zealand retailers, consumers and our export business to have one standard to regulate primary organic products in New Zealand.

RETAIL NZ SUPPORTS A SINGLE MANDATORY STANDARD FOR ORGANIC PRIMARY PRODUCTS

A mandatory standard for organics would provide businesses who sell organic products more certainty when making organic claims. Such a standard would also give consumers more certainty and confidence that organic claims were consistent and truthful, ensuring customers that any primary organic product they purchase goes through the same process.

We support MPI's preferred option, which states that having an organic standard that all relevant businesses must meet will be of the best benefit to New Zealand. Not only does this provide certainty to retailers and confidence for consumers, but it also is the best option to facilitate trade in a global marketplace.

KEEPING COMPLIANCE COSTS LOW AND MAINTAINING A LEVEL PLAYING FIELD ARE KEY

A mandatory standard will be favourable, as long as costs are kept low. We are conscious that a new regime to standardise organics will come with costs to government, businesses and possibly

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the consumers. However, keeping compliance costs down will likely allow more businesses, growers and producers to take up new mandatory standard requirements.

If a mandatory standard for organics is in place, then it must cover imports as well as exports in order to level the playing field. This means that all goods classified as primary organic products that are being sold into the New Zealand market (including from offshore websites) must meet the standard as well. This is to ensure that our retailers and consumers are not being disadvantaged by domestic regulations.

CONCLUSION

We believe it is necessary for a single mandatory standard for primary organic products to be implemented. This is good for businesses, and it is good for consumers who are often confused by the various organic certificates or are unsure if organic claims are truthful.

Thank you for taking the time to review our comments. Please let me know if I can be of any further assistance.

Yours sincerely,



Scott Fisher

CEO

s 9(2)(a)

s 9(2)(a)

Caroline Hoekman (Caroline)

From: Klaus Thoma s 9(2)(a)
Sent: Monday, 11 June 2018 12:13 PM
To: Organics Consultation
Subject: Feedback on Proposal to Regulate Organic Production
Attachments: Organic Standards Sub.jpeg

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

Klaus Thoma and Maria Koch
Kokalito Fine Foods Ltd

s 9(2)(a)

Email.finefoods@kokalito.co.nz

Dear MPI, I attach a word document with our submission.

Regards,

Klaus Thoma
Maria Koch

Kokalito Fine Foods Ltd

Klaus Thoma and Maria Koch

Managers

Kokalito Fine Foods Ltd

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Fully Certified by Organic Farm Ltd

OFNZ 1352

RE: Consultation on organic production standards

Thank you for the opportunity to give us the opportunity for feedback on MPI's review on organic production regulation. We also appreciated the quality of your consultation document.

Kokalito Fine Foods has been fully certified by OFNZ for 12 years and our involvement in the organics movement dates back to 1984 when the certification body Biogro was being set up with the involvement of Lincoln's Biological Husbandry Unit, the then Ministry of Agriculture and in particular Bob Crowder. We are also a supporting member of IFOAM.

We fully support MPI's preferred options towards the development of mandatory, national organic standard for domestic organic production, certified organic imports and exports.

New Zealand government has been notably nearly absent in the adequate development of the organic production sector. The national regulation of organic production standards could finally align New Zealand with international best practice removing uncertainties about organic production and products. Kokalito Fine Foods is mainly involved in domestic organic production and organic products import substitution, we also hope that the regulations will define externality costs of organic product imports. We also support MPI's 'Official Organic Assurance Programme (OOAP)'. We can see several advantages for the national organic legislation:

- Term and use of the term 'organic' is legally defined and protected;
- Single national standard increases economic efficiency;
- MPI's OOAP assists everyday organic production processes;
- MPI's OOAP, in line with international practice, may attract government support for the promotion of sustainable land use practices;
- Environmental claims, based on organic production and processing methods, can be better substantiated;
- Well-designed organic production standards increase access to organic certification, a statistic which is very low here in New Zealand by international standards.

Please keep us informed of any future developments

Regards,

Klaus Thoma

Maria Koch

Caroline Hoekman (Caroline)

From: AJ & DA McHardys
Sent: Monday, 11 June 2018 1:36 PM
To: Organics Consultation
Subject: Grower submission
Attachments: CCE06112018_0002.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: NUMBER 100!, To put in submission database

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

GENERIC LETTER

Your name and title *MR A.J. McHardy*

Organisation's name

Contact Details

s 9(2)(a)

Re: Organic Consultation

s 9(2)(a)

2

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.

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

Name and signature here

[Signature]
MR A.J. McHardy

Caroline Hoekman (Caroline)

From: Sharon Shannon <s 9(2)(a)>
Sent: Monday, 11 June 2018 1:49 PM
To: Organics Consultation
Subject: Submission to MPI Discussion Paper 2018/09 organic regulations
Attachments: MPI submission organic regulation 070618.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

Please find attached submission for Organic Dairy Hub Co-operative NZ Ltd

Kind Regards

Sharon Shannon
Executive Director

Organic Dairy Hub Co op NZ Ltd


W <http://www.organicdairyhub.co.nz>

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ORGANICDAIRYHUB

optimising opportunities for organic dairy

www.organicdairyhub.co.nz Contact info@organicdairyhub.co.nz

P.O Box 760 Masterton

Submission to Ministry for Primary Industries

Would New Zealand benefit from new organic regulations?

This submission is submitted on behalf of the Organic Dairy Hub Co operative NZ Ltd.

Who is Organic Dairy Hub Co-operative NZ Ltd:

Organic Dairy Hub Co-operative was formed and operational in 2015. A co operative of organic farmers, the business was set up on the basis of being intergenerational. Our farmers span the North Island of New Zealand, top to bottom, coast to coast, producing the very best fresh organic milk for our processors and their consumers.

All our shareholding farmers are certified organic to cover a range of markets, including but limited to New Zealand domestic, EU, NOP and Chinese. All our farms are audited by independent third party auditors such as AsureQuality and BioGro. The Hub has on farm standards our farmers must adhere to. Our farmers see milk quality not only about the rules and testing but also about having pride in the milk they produce. As the world consumer looks for more sustainable farming practices and better animal welfare, our farmers had already shifted their thinking and farming practices to best care for the land, environment, staff and animals.

Organic Dairy Hub Co op NZ Ltd comprises 40 shareholding organic dairy farmers with a board of four farmer Directors and two independent Directors. Chair of the Board is Independent Director Peter Harris. CEO is farmer shareholder Sharon Shannon.

Most certified organic producers would agree the word organic is used very loosely when marketing to the consumer and we welcome the opportunity to investigate how putting measures in place could bring structure to the way the word organic can be used in relation to organic products.

A question that was asked and not fully answered at the regional meetings was why the Organic Exporters Association of NZ are pushing to have the New Zealand organic industry regulated in New Zealand and what benefits do they see coming from this? We think to fully understand why this is up for discussion this question needs to be asked and answered.

Our farmers believe the industry could possibly benefit from a regulated industry if this provided compliance and transparency behind products currently being labelled and sold as organic but not certified organic. We must look to educate the consumer that there is a difference between certified organic and organic. Our farmers go to great lengths and incur additional costs to support the integrity and transparency of the methods they use to produce certified organic products.

Organic Dairy Hub agrees there would be benefit in MPI investigating further and then holding a second round of consultation. More information could then be made available to all interested parties about how a regulated organic industry would work for New Zealand producers and consumers as well as the associated costs.

In the second round of consultation there needs to be a clear definition of what constitutes a small business and why these businesses should be exempt. Often it is the smaller producers that sell product and call it organic yet have little to no transparency behind the claim. If the industry were to be regulated, then it should be mandatory for all organic producers selling product labelled organic to be verified by a third party.

New Zealand already has third-party verifiers offering a verification service. For example, Organic Farm NZ offers small business verification services for a relatively small fee.

If the industry were to be regulated, then producers would need to be certified annually by a third party certifier to ensure producers' practices are adhering to the organic standard being certified to. This should apply to all organic businesses.

Organic Dairy Hub welcomes further investigation by MPI into the logistics of a regulated organic industry in New Zealand to enable producers to see what direct impact that could have on organic producers from a cost and compliance perspective.

As our farmers provide product for domestic and the international market, as an organisation, we would be reluctant to see further costs imposed on a certified organic farmer when they already currently pay to be certified as well as meet the domestic and international organic regulations.

Kind Regards

Sharon Shannon

Executive Director

Organic Dairy Hub Co op NZ Ltd

s [redacted]

9(2)

W <http://www.organicdairyhub.co.nz>

Caroline Hoekman (Caroline)

From: Sridhar Jaganathan <s 9(2)(a)>
Sent: Monday, 11 June 2018 2:07 PM
To: Organics Consultation
Cc: David Coles 9(2)(a)
Subject: Our Submissions on the discussions of New Organic Regulations
Attachments: Submission to MPI on Organics by MCAS - June 2018.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

Hello

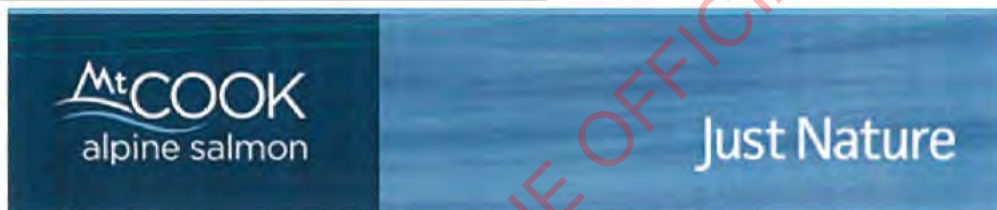
In response to the MPI Discussion Paper No: 2018/09 regarding the proposal for New Organic Regulation, we are excited in making our submissions as attached for your consideration. And we look forward to seeing some progress on this submission in near future

With Regards

Sridhar Jaganathan
Quality & Compliance Manager

s 9(2)(a)

W alpinesalmon.co.nz





Mt Cook Alpine Salmon Ltd
P.O Box 2005, Washdyke, Timaru 7941
80 Sheffield St, Washdyke, Timaru

S [REDACTED]
E: sridhar@alpinesalmon.co.nz
www.mtcookalpinesalmon.com

11 Jun 2018

To

Food Policy
Ministry for Primary Industries
PO Box 2526
Wellington 6140
New Zealand.

Sub: Submission on Proposed changes to the way organic production is regulated

We are the leading company in New Zealand for fresh water cultured Salmon, exporting to seven different countries besides serving the domestic market. We are keen to look at the prospects of Organic certification for our products because our overseas customers especially in USA & China have been consistently requesting us to present a pathway to organics. The opportunity for New Zealand to set up a regulatory framework that will be recognized by our trading partners is an important step forward and we very much want to see salmon included within any new framework.

From past discussions with BioGro, we meet many of their assessment measures.

- Our fish are raised under environmentally sustainable farming practices across four farms.
- The glacial water that flows through our farms, create a constantly refreshed environment keeping our fish healthy, naturally. Hence there has never been a necessity for us to use growth hormones, pesticides or antibiotics.
- We only use premium feed from a trusted international supplier; all feed is sustainable and certified GM free.
- We are audited and approved by Global Food Safety Initiative Recognised Certification Programme – BAP (Best Aquaculture Practice) both on Farming and Process activities.
- We were the first salmon farm in Australasia to receive Best Aquaculture Practice Certification.

Hence we would like to make our submission as a feedback in response to the consultation document "Would New Zealand benefit from new organic regulation?" published by your office, as enclosed.

Yours truly

Sridhar Jaganathan
Quality & Compliance Manager
Mt Cook Alpine Salmon Ltd

Encl.: Submission as above

Following Survey Form reproduced from the MPI published discussion document
Would New Zealand benefit from new organic regulation?

And our responses are in blue font

Appendix 2: Summary of questions

We seek your views on what these proposals would mean for you as an individual or business having an interest in organics. Answering these questions is optional, however you may like to use this list to help you provide a submission.

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.

Mt Cook Alpine Salmon has been operating for more than 20 years growing freshwater King Salmon in the fast moving glacial waters of the hydro canals in the South Island. The company has nearly 100 shareholders, exports to 7 countries and has high growth profile. The company has a board of largely independent directors, chaired by former Prime Minister, the Rt Hon Jim Bolger ONZ. We employ nearly 200 full time employees – largely in regional locations across the country. Our international customers are keen to see us attain organic certification and we believe we already meet many of the criteria.

- Our fish are raised under environmentally sustainable farming practices across four farms.
- The glacial water that flows through our farms, create a constantly refreshed environment and help our fishes stay healthy, naturally. Hence there has never been a necessity to use growth hormones, pesticides or antibiotics.
- We only use premium feed from a trusted international supplier; all feed is sustainable and certified GM free.
- We are audited and approved by Global Food Safety Initiative – Recognised Certification Programme, both on Farming and Processing activities.
- We were the first salmon farm in Australasia to receive Best Aquaculture Practice Certification.

• Please select all those that apply to you. Are you...

How many employees do you have? ☐ 0 ☐ 5 ☐ 6-10 ☐ 10 ☐ 20 ☒ 20+

b. What activities, if any, does your business carry out in relation to organic products?

- | | |
|---|---|
| <input type="checkbox"/> produce organics | <input type="checkbox"/> sell organics in New Zealand |
| <input type="checkbox"/> process organics | <input type="checkbox"/> export organics |
| <input type="checkbox"/> store organics | <input type="checkbox"/> import organics |
| <input type="checkbox"/> provide contracted services in relation to organics <input checked="" type="checkbox"/> other (please specify) | |

We produce, process, export and also sell locally, all our fish that can qualify to be certified as Organic. But have not taken to certification yet, since we are waiting for the standards to be declared by MPI, which would be more recognizable for international trade, than using other labels offered by private local certifiers.

c. What kind of products do you deal with? (please select all that apply)

- ☐ 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),
- ☐ 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...

- ☐ directly to consumers (e.g. farmers markets, gate sales)
- ☒ to a retailer or distributor (e.g. speciality shops, supermarkets)
- ☒ to a foreign customer (e.g. exports)
- ☐ other (please specify)

Part 1: Introduction, purpose and context Page 3

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. *Yes we agree with the proposed scope and we also want to see aquaculture products like Salmon included.*
2. To what extent do you agree with the description of the current context for organics? Please explain why. *Yes we do agree all of it as declared on page 3*
3. To what extent do you agree with the description of the current regulatory environment for organics? Please explain why. *No Comments*
4. Do you agree 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. *No Comments*
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. *No Comments*

Part 2: Options for how a new regime for organics could work Page 10

6. Do you agree or disagree that a standard setting out requirements for production methods would be best suited to organic production? Please explain why. *Yes, agree for the need to set standards for production as a requirement for Organic products.*

Issue 1: Should a new standard be voluntary or mandatory? Page 11

7. Do you think that the correct options have been identified? Are there alternative option(s) that should be considered? Please describe. *Yes all options have been identified as listed on page 11*
8. Are there any positive or negative impacts of any options that are not described? Please describe any impacts that we've missed. *No Comments*
9. If a standard became mandatory for all organic operators, what would be the positive and/or negative impacts on you or your business? *On the positive side it becomes a level playing field for all organic market participants. It would give us a competitive advantage over some of our international competitors who already have organic certification and command price premiums in the market.*
10. To what extent do you support or oppose the use of a logo to help distinguishing organic products from non-organic products? Please explain why: *Yes we do very much support the idea of one national organic logo, so it would be easily recognized by general public otherwise, there will be confusion & doubts arising in the minds of the consumer if too many privately owned logo labels are allowed to proliferate..*

Issue 2: How should we check that relevant businesses meet the standard? Page 13

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

12. Are there any positive or negative impacts of any options that are not described? Please describe any impacts that we've missed. No Comments

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? The positive side of the impact is it would encourage more number of small business operators to join the organic marketplace and in turn they would contribute in establishing the regulatory regime by a small token fee through registration, even though they may be exempt from mandatory verification. And that contribution will go towards reducing the burden of higher cost for bigger players.

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, volume sold, others... We think it should be tied to enterprise scale. At some level every organization should bear the direct cost of certification audit.

Summary of proposals Page 16

15. To what extent do you support or oppose this combination? Please explain why. We very much support the combination of above mentioned factors, because applying exclusion criteria by just one factor (sales turnover or volume) for one sector may not necessarily hold good for another sector

16. What changes or impacts would this combination of options involve for you and/or your organisation? We do not see any significant impact for us from this combination of options as we are still not in the market place yet officially.

17. What would be your preferred combination of options? This can include any listed options and any other possible option not listed. 2 C: Ongoing verification, with limited exceptions

Part 3: If needed, proposed features of empowering legislation Page 18

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

19. Do you have any comments on the range of proposed compliance and enforcement tools?

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

Part 4: General comments and next steps Page 21

21. If you have any other comments or suggestions please let us know. No Comments

22. What evidence should we examine to inform further analysis of this proposal? No Comments

Feel free to attach documents or links to your submission. No Comments

From: Noel Josephson s 9(2)(a) >
Sent: Monday, 11 June 2018 2:18 PM
To: Organics Consultation
Subject: Submission Organics Consultation
Attachments: Regulation of Organic in New Zealand .docx

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

Dear Sirs,

Please find attached a submission in regards to your consultation on organics from Ceres Organics.

Thanking you,
Your sincerely
Noel Josephson

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Submission to the Ministry for Primary Industries

Proposal to regulate organic production.

June 8th 2018

Submission from Ceres Organics Ltd

Noel Josephson CEO

s 9(2)(a)

P.O. Box 11-336 Ellerslie Auckland

s 9(2)(a)

Ceres Organics is New Zealand's largest certified organic company with the leading brand of certified organic food in the New Zealand market. The brand 'Ceres Organics' is also widespread in the Australian and selective Asian and Pacific Island markets.

Ceres Organics is a member of a number of organic industry bodies including Organic Traders Association of Aotearoa New Zealand (OTANZ) and the Organic Exporters Association of New Zealand, both of these bodies are members of Organics Aotearoa New Zealand (OANZ) and through them we attend OANZ meetings. We are also members of The Biodynamic Farming and Gardening Association of New Zealand and Soil and Health. We are certified organic by Biogro.

Introduction, Purpose and Context

1. *Do you agree or disagree with the proposed scope?*

Ceres Organics agrees with the proposed scope but recommends the inclusion of aquaculture products.

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

Ceres Organics agrees with your description of the current context for organics and we can verify that the market context in which we are directly involved is correctly stated.

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

In general Ceres Organics agrees with your description of the current regulatory environment for organics but notes some small discrepancies.

The description of AsureQuality and Biogro as private standards neglects to mention they are members of IFOAM and their standards align with IFOAM standards. That is to say a civil

society organisation working on an international basis is an essential partner to a national governmental body as it is in other countries.

Demeter is described as combining biodynamic methods and key organic principles. As biodynamics was the first organic farming method, it would be more correct to use a different nuance and say 'uses biodynamic methods and has some key principles in common with organics' or to say biodynamics is organics plus.

4. Do you agree that this is a good opportunity to change the way organics are currently regulated in New Zealand?

Ceres Organics agree this is a good opportunity to change the way organics is regulated in New Zealand, and is in fact overdue given the regulation of organics elsewhere. We agree that organic claims relate to production methods and that what needs to change is the use of the term 'organic' in the market, including the retail market, reflecting what is currently understood for production to be certified organic. The use of the word 'organic' needs to adhere to a quality standard such as that currently available through the organic certifiers referenced in your discussion document under, organic domestic standards. There needs to be one unifying national standard that doesn't exclude any body setting a higher standard if they choose. This standard must carry over into any final product that chooses to use the word organic as a description to the whole or any aspect of the product as coming from certified organic production such that they also carry organic certification.

5. Do you think that the appropriate objectives for a new organic regime have been identified?

We note your objectives for a new organic regime as:

- Consumers have confidence in the way organic products are produced, and a variety of products to choose from;
- Businesses have regulatory certainty to invest and innovate in organic products;
- New Zealand's regulatory regime is effective in enabling trade in organic products;
- The regulatory regime has flexibility and is simple to understand and administer; and
- The costs to businesses and consumers are proportionate to the overall benefits.

Ceres Organics agrees with overall objectives including:

- consumer confidence at retail level knowing the use of the word organic means they are buying goods produced under one standard across the industry;
- businesses are entering the organic environment on an equal footing and understanding, and have certainty to invest and innovate; and
- the regulatory regime enables trade, is simple to understand and administer and utilises the existing framework of certifiers to maintain proportionate and reasonable costs to businesses and consumers.

We would oppose a separate and new regulatory framework aimed at these objectives. The existing network of certifiers and industry bodies carries these objectives but they lack national regulatory compliance and some coordination.

Options

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

Ceres Organics agrees that any organic standard must be process-based. The method of farming organically calls for specific processes and excludes specific processes. Therefore the standard must set out requirements for production methods.

7. *Do you think that the correct options have been identified?*

Ceres Organics believes you have correctly identified the broad options.

8. *Are there positive or negative impacts of any options that are not described?*

Ceres Organics believes you have described the positive and negative impacts. The negative impact on small growers, processors and traders may decrease the consumer choice depending on how the regulatory environment caters for entry, but we believe everyone should be on a level playing field in the use of the term organic.

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

Ceres Organics already operates according to the mandatory standard required by certifiers to use their logo and the words 'certified organic'. Providing a similar environment existed following government regulation then there would be no effect on us.

There would be an effect on others in the same market as us who use the word organic without third party certification which may benefit us if they do not get comparable certification. We also have a number of small suppliers who may be affected by any increase in costs associated with regulation. In this instance we would choose to work with them to find a path to alleviate these costs.

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

Ceres Organics fully supports the use of an organic logo to distinguish organic products from non-organic products and thinks this is essential. We support the continued use of the logos associated with Biogro, AsureQuality and Demeter in the New Zealand market as these logos have gained consumer recognition and acceptance. We do support an additional logo alongside these logos if this helps in international markets with equivalence and verification that the product is meeting national standards.

11. *Do you think that the correct options have been identified?*

Ceres Organics believes you have identified the correct options.

12. Are there positive or negative impacts of any options that are not described in the above section?

Ceres Organics notes that it is not clear what roles the various bodies play in the proposed regulation of organics. We strongly favour keeping the existing organic certifiers in the regulatory environment and that the government body tasked with any regulatory regime takes on the role of auditing the certifiers. We believe this is the most efficient way to preserve a cost effective environment for the end consumer.

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?

Ceres Organics believes there would be no effect on our business. We would want to ensure especially small growers that supply us were able to continue and it would be in our interests to assist those who required help. We would be concerned with any disproportionate changes in the cost of compliance.

14. If some businesses were not required to be verified on an ongoing basis, what do you think the criteria for exemption could be?

Ceres Organics would support exemptions based on a multiple of factors including sales at the farm gate or farmers markets where the annual turnover did not exceed an amount. We note that this annual turnover should be a total of the whole enterprise's sales not just the organic component. We would also favour groups of small farmers being able to work together in some combination and under some regulation that allowed for compliance costs to be proportional to the size of their enterprise.

Summary of Proposals

15. To what extent do you support this combination?

Ceres Organics supports the combination of options proposed with a mandatory environment with limited exemptions. We do so because this provides the consumer with an assured standard, it provides clarity, certainty and a level playing field in the market for businesses, and it provides a clear organic standard for overseas countries to evaluate New Zealand on. We think this is the minimum needed to create an effective regime.

16. What changes or impacts would this combination of options involve for you and/or your organisation?

Ceres Organics believes this puts us on a level playing field and provides transparency in the marketplace. We may lose some customers who choose not to continue with a few organic ingredients and we may gain some who choose to go fully with organic.

17. What would be your preferred combination of options?

Ceres Organics is fully supportive of the option you have outlined provided the compliance costs do not escalate out of proportion to the current costs of organic certification. To ensure this we would suggest the current certifiers remain in place and the appropriate government body tasked with compliance to a standard act as their auditors.

We also would suggest that imported bulk food ingredients need to comply with a national standard and should be recertified under a national standard based on equivalence.

Imported finished retail or packaged products should have their existing national organic certification recognised providing there is a basis for equivalency.

We question whether there is a loop hole or possible area that is hard to control when a retailer buys fresh produce or bulk food ingredients and labels a bin or shelf as organic and there is no reference back or immediate traceability back to the bag or crate they bought it in.

Outside of this consultation is the treatment of some organic produce on entry to the country, such as bananas, with chemicals such as methyl bromide which render the organic certification invalid. While this is a biosecurity matter and not a matter of this consultation we nonetheless raise the issue the possibility of exploring treatments on entry to the country compatible with organic production.

18. Have the powers required to implement a new regime been correctly identified? Are there any other components you think would be necessary?

Ceres Organics broadly agrees with the powers proposed to implement a regime but we do have some areas of concern.

Under Proposed features 1 – The setting of rules for organic standards should not be in the hands of government alone otherwise it risks becoming subject to the interests of bodies with government influence that may well not align with international organic standards as determined by IFOAM as has happened in the USA. We propose that there is a strong industry representation that works alongside the government in setting standards.

Under Proposed features 3 – The government should recognise existing agencies and potentially new agencies. We are unsure why persons as official verifiers should be part of this and why they don't fall under agencies.

Under Proposed features 4 – The ability to recover costs from the industry as a whole should be offset against the support the industry receives, i.e. there is no levy funding collected from producers and directed specifically towards the organic industry. Any support the industry receives comes from the private sector.

19. Do you have any comments on the range of proposed compliance and enforcement tools?

Ceres Organics believes minor non compliances should be treated very differently from major and repeated non compliances.

20. Do you have any other comments about the proposed legislative settings

Ceres Organics supports flexibility in the standards such that technical information can be decided and adjusted outside of legislation.

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

Ceres Organics believes your industry wide request for submissions should fully inform your proposal and if any sector of the industry raises points that are supported by others then further analysis in this area may be needed.

22. *If you have any other comments or suggestions please let us know*
None

Thank you.

Noel Josephson

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Stephen Hazelman s 9(2)(a)
Sent: Monday, 11 June 2018 2:39 PM
To: Organics Consultation
Cc: Karen Mapusua
Subject: Comments by the Pacific Organic & Ethical Trade on the Proposed NZ Organic Regulations
Attachments: NZ Organic reg POETcom input .pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: To put in submission database

Greetings from the Pacific Organic & Ethical Trade Community.

We represent over 45 members in 16 Pacific Island Countries and Territories

We sincerely hope you will not mind the Pacific's Organic Movement (POETCom) commenting on your proposed regulation

Please find attached our inputs

We wish you all the best and hope that New Zealand and the Pacific will continue to work together to grow organics in our pristine, green, blue safe Pacific

Please visit our website: www.organicpasifika.com and Face Book page: Organic Pasifika

Sincerely

Stephen



Pacific
Community
Communauté
du Pacifique

Stephen Hazelman
Acting POETCom Coordinator
Organic Extensions Systems Officer (POETCom)
Land Resources Division | Pacific Organic and Ethical Trade Community
Pacific Community
SPC Private Mail Bag, Suva, Fiji

s 9(2)(a)

| Web: www.organicpasifika.com

Facebook: Organic Pasifika



Submitted by

Stephen Hazelman, Acting Coordinator POETCom

On behalf of

Pacific Organic and Ethical Trade Community(POETCom).

Contact details

c/- SPC Private Mail Bag, Suva FIJ

S

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POETCom is the peak body for organic agriculture in the Pacific Islands and manages the Pacific Organic Standard and Pacific Organic Guarantee Scheme. POETCom represents an active organic sector across 15 Pacific Island Countries with more island states engaging in organic agriculture and exports every year. POETCom is housed in the Land Resources Division of the Pacific Community (SPC) in Suva Fiji.

Question 1

We support the option of regulating the use of the term organic. We believe that the New Zealand market is ready for such a regulation and that it could set valuable precedents for the Pacific islands emerging organic markets.

Based on our experience in the Pacific with a regional standard we believe that it is best to let the national organic standard grow step by step, starting from food and beverages of agricultural origin, then adding aquaculture and perhaps body care and textiles once the food and agriculture standard is strongly implemented. The Pacific Organic Standard contains aquaculture but aquaculture standards are changing rapidly internationally and to maintain equivalence in this changing area is difficult at this time.

Question 4

We support the idea of regulation and of a mandatory single national organic standard to act as the legal baseline for what is called "organic" however private standards should be able to continue to exist, above and beyond the legal baseline. We believe that this standard should cover the domestic market and export markets (for those markets who will grant equivalence to the NZ system).

For imports into NZ, we believe that the approach should be based on equivalence. Using the IFOAM Family of Standards as a criteria for which foreign organic standards are recognized as equivalent for imports would be the most practical option. This includes the Pacific Organic Standard which would greatly facilitate development of organic trade from the Pacific Islands and the development of organics in the Pacific Islands. With regards to the management of the national organic standard, we would recommend something close to what is being developed in the Pacific and also Canada, whereby the government owns the standard (in the case of the Pacific through the Pacific Community-SPC) but where the implementation, development and regular updates of the standard

lie with the national (in the case of the Pacific regional) organic sector or at least a public private partnership system.

Question 5

We support the objectives listed under the section "What we think an organic regime should achieve". We would however propose the addition of two more objectives as follows:

- 1 "The regulatory regime is provides for verification options that are suitable to small businesses". This will again facilitate development of organic exports from the Pacific Islands
2. "Provide a national definition of organic agriculture that can serve as a basis for further policy support towards the sector". It is possible to compensate organic farmers for ecosystem services and such an objective could support re allocation of funding towards organic production systems, as defined by the regulation.

We would also support the inclusion in the definition of organics and objectives:

- Considerations for the indigenous culture, traditions, overall ecological harmonisation
- Social justice, Human rights, Equity and Fair Trade relationships
- Food & Nutritional security maintained in farm supplying networks for exported crops
- Approaches about Low Carbon Economy and adaptation to climate disruptions
- Adapted Biodiversity integration in agro systems
- Preferential use of low till practices, erosion control and perennial crops

Part 2: Options for how a new regime for organics could work

We agree that the NZ national standard for organic production should be a processed based standard, following the approach commonly used in other countries including the Pacific Islands.

Question 9

Mandatory certification could impact on the possibility for Pacific Island business to export to NZ if costs for certification increase through needing to obtain an additional organic certification. This could be mitigated by utilising equivalence agreement.

Question 13

In terms of exempting some businesses from on going verification, annual turn over could be a useful criteria to exempt hobby-producers from the obligation of on-going verification, it could also support development of organics in the Pacific where small scale producers can be excluded from organic due to the high costs of ongoing verification.

Commented [U1]: Is it excluded from organic certification or verification?

We believe it is important that different options for verification are available to small businesses, to preserve existing functioning guarantee systems (e.g. PGS such as OFNZ and Organic Pasifika Guaranteed in the Pacific Region) and to avoid small businesses suffering from disproportionate costs. Therefore support option 2C provided that in the sentence "all other relevant businesses would be required to..be independently verified", the term "independently verified" included both third party and PGS. Criteria may be developed for what kind of production systems could be verified through PGS, and for which PGS would be considered acceptable.

To support the implementation we also recommend

- Developing a NZ national web platform facilitating :

- clarity for regulation
- easy imports for complying Operators, for CBs and NZ Customs (guaranteeing traceability, transparency where appropriate)
- allowed inputs for the organic regulation

- Providing guidelines for labelling rules (for Operators, CBs etc)

- Agreement for alternative check plans instead of HACCP plans that are complicated for Farmers or Farmer networks and even for some exporting processors (CBs should assist Operators for these plans).

- Accepting biosecurity measures or treatment (for Organic imports) that are applied from the exporting country (example not to reproduce: that of the USA that systematically fumigates methyl bromide any importation of plants origin products and demand operators and CBs to control their organic goods are not treated in this way on arrival in their territory).

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From: Mark Ross s 9(2)(a)
Sent: Monday, 11 June 2018 2:49 PM
To: Organics Consultation
Subject: Agcarm submission
Attachments: Agcarm submission would NZ benefit from new organic regulation June 2018.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: To put in submission database

Hi

Please find attached a submission from Agcarm on the organic regulation discussion paper.

Kind regards

Mark

Mark Ross

Chief Executive

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To: Ministry for Primary Industries
organicsconsultaion@mpi.govt.nz

Submission on: Would NZ benefit from new organic regulation?

Date: 11 June 2018

Submitter:

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Chief Executive
Agcarm representing NZ's animal medicine and crop protection industries
111 The Terrace
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Phone: s 9(2)(a)

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Submission on: Would NZ benefit from new organic regulation?

1. Introduction

- 1.1 Agcarm welcomes the opportunity to comment on the discussion document – ‘Would New Zealand benefit from new organic regulation?’
- 1.2 Agcarm has a strong focus on sustainability and stewardship within our strategic priorities. We are supportive of innovative solutions to enhance New Zealand agriculture, and welcome new initiatives that support the drive for productivity with the need to sustain our environment.
- 1.3 The idea of a single regulatory system for organic regulation in New Zealand is viewed as pragmatic. We believe it would be beneficial to standardise the organic sector, to allow greater certainty with the scope of regulatory oversight. However, it is unclear at this stage how a revised regime will look, or how it would work in practice. On this note we wish to be involved in future discussions on the progression of this initiative.

2. General comments

Agcarm supports organic production as a niche sector within New Zealand, and understands the need to ensure that the most suitable regulation is in place for the industry. A consistent standard for organic product inputs would provide greater assurance to local and export markets that organic produce being sold has met approved regulatory requirements. However, as we don't have enough details on the benefits of one regulation and how it would work in practice, at this stage we are taking a 'watching brief' view point to this approach.

In the interim, we raise the following points for consideration:

- i. With any new regulation it is important that it has a purpose and adds value to New Zealand agriculture, while at the same time resulting in a positive return on investment for growers/farmers. Agcarm supports the consideration of the 'Return on Investment' principle when government is deliberating on the benefits of developing new organic regulation.
- ii. Over the course of agricultural history, many different forms of agricultural production systems have existed side-by-side, both temporally and geographically. In recent years, different productions systems have become variously referred to as:
 - Conventional meaning farmers who utilise modern crop protection and fertiliser products
 - Biotech meaning farmers who utilise modern crop protection and fertiliser products in conjunction with germplasm that has been improved through modern biotechnology
 - Organic – meaning farmers who utilise processing practices that emphasise:
 - a) the use of renewable resources
 - b) conservation of energy, soil and water
 - c) recognition of livestock welfare needs, and
 - d) environmental maintenance and enhancement, with restrictions on the use of modern crop protection and fertiliser products.

It is important to note that these production systems are not, and should not be, mutually exclusive of one another.

- iii. Any new regulation must be based on sound science, rather than a 'feel good factor' for consumers and/or growers/farmers.