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Sent: Sunday, 10 June 2018 10:27 PM
To: 'organicsconsultation@mpi.govt.nz'
Subject: OrganicAg organic submission

Submission relating to;
Would New Zealand benefit from new organic regulation?

MPI Discussion Paper No: 2018/09

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I strongly oppose the introduction of an Act (Bill) and subsequent regulation.

Who am I;

Bill Quinn has had involvement in agriculture and agricultural politics and policy matters for over 40 years. Bill and family have operated as individuals and under the trading names BioSoils and OrganicAg;

- as producers (non-organic and organic) in the dairy, drystock and horticulture sectors.
- As educators/mentors to conventional producers and more so the last 30 years to organic horticulture, dairy and drystock sectors.
- As promoters of biological production and certified organic production.
- As mentors to a number of certified input providers to the organic sector.
- As mentor to a range of processors and marketers both domestic and export.
- Involved in many aspects of current organic certification.

Points of observation/comment relation to the document content;

Executive summary;

Para one; accepted.

Para. Two; a good description of the current position for the domestic market; for the export market I object to the use of the word 'rules' (end of para)...I believe that under the OOAP exports are indeed meeting the market entry regulations (OMAR) of the desired market---much more than rules.

Para three; the point that consumers do have different expectations relating to the purchase of organic (claimed) goods is a key reason for not Regulating the word when we in NZ have the Fair Trading Act---make a credence claim—back it and the Commerce Commission has shown faith in using the Act—we should be using it to a greater extent.

Purchasers buy organic for a wide range of reason, food value, social justice, environment, animal welfare, social status, human health, some buy for one reason some multiple.

The differences are also very apparent in the market (export) place with a range of production criteria differences in each market.

Para. Four; the reference to 25 countries misleads as many of the 25 are subject to the EU collective Regulation not the countries own regulation. I believe it is important to note that we currently trade with a huge range of countries and meet the expectations for those countries by either having a Government to Government arrangement or by meeting the importing market access regulation. It is also important to note that few other countries export the high percentage of primary production that NZ does, whether organic or non-organic.

Para six; I agree with the last sentence that we need to be careful not to regulate ourselves at a higher level than any current export market would allow, should the current MPI tech rules become the minimum standard of production we would indeed lock ourselves out of some markets and we currently have a system we understand the cost structure of---we may not agree with it but we do work within it and successfully so.

The biggest single issue facing the organic sector in NZ is the lack of organic primary production, while this is in reasonable growth currently with good prospect it is the issue we have with market access—we have nothing to meet the market demand.

1/ What we mean by 'organics'"

No general issues with the description. Organic on farm practise has and is leading the way in the greening of primary production in general with many practises and products adopted by non organic producers.

2/ Which organic products are we interested in?

The limitation of the scope is shocking, if we as a nation were to regulate it needs to cover all products making the claim otherwise it has no merit. To focus on primary production (land based only) is extremely short sighted as we see the huge increase in human body care and personal hygiene certified and claim only organic products, the range of inputs to primary production making claims re 'organic practise' biologically friendly etc. , the Fair Trading Act can be used to challenge all of the 'credence claims' regardless of the product scope.

3/ Demand for.....

I agree with the general description.

NZ is falling well behind the supply demand balance point and this is a serious matter for all exports from this nation as all production system come under every greater scrutiny.

4/ The regulatory....

I accept the description given.

The range of certified products available to consumers ---who can sight the 'standard' or 'Regulation' on line currently provides choice to meet a range of organic expectations, not every one wants to buy Demeter product but that do can.

5/. Why change.....

I do not agree that this is a good opportunity.....

This is a good question and the paraphrase '*if it isn't broke don't fix it*'. I accept that there are a range of challenges in the current system but do not see anything in this proposal that will not have similar issues. The time it has taken get the NZ China recognition agreement to an effective point (still to arrive at Jan 2017 to June 2018)) has not stopped continued and new exports to China-----the system we have gets us to any market we wish to sell to.

The main reason is that the organic sector is not well structured and represented, it does not hold regular national conference/events and is way under resourced, to create good change will consume considerable resource that is already stretched. This will draw energy and resources away from growing the current supply base to meet existing opportunities ---without the need to change the current system---

Our current export arrangements work and the Fair Trading Act provides surety for the domestic market, while allowing a range of scale and enterprise to develop.

If this paper had provided detail of lost export opportunity (current or imminent) , if the Commerce Commission was failing to apply the FTA to protect consumers with regard to organic credence claims there may be a case.

The CC only earlier this year made a public statement supporting the FTA in respect of organic claims, as it did in a series of published booklets when the FTA was new to NZ.

Section----What we think.....

Consumers in NZ can check in a range of forms the credence claims and determine if the BioGro, Asure Quality, other NZ or indeed international claims (USDA) meet their expectation. Retailers like Common-sense Organics provides a good level of information relating to which if any certification or code of practise the give product is subject to.....buyer choice and they do. The bigger players such as Countdown/New world etc are also very good at maintaining the organic integrity with good and improving signage and labelling.

The fear factor of NZ not having a regulation affecting the export aspect is I believe misleading as we have good and clear market access----we are just short on product to meet the current demand and to their OMAR requirements.

Part two;

Q6. We already have a system in place and good international compliance, the systems internationally are all input based not output accessed.

Q 7. Keep the status quo and provide more resource to CC for the FTA.

Q8. The current MPI tech rules would restrict some current practise for specific markets. (USA beef vs EU or NZ beef)
Q9.

Q10. I fully support the use of logos to identify and market organic product----we already have this, whether AQ. BG, Dem, OFNZ , USDA, EU, BFA, NASA and so on, some growers have developed their own logo and credence claim and the consumer can check these or choice to not engage.

Q11-----14; do not fix what is not broken.

Balance of document-----the focus needs to be on more production/conversion to organic to whichever market we can, the comment re taking 3 years to convert is misleading when the EU has a 24 month conversion period and the USDA can accept a backdate for compliant practise that can dramatically reduce the 36 month (land) conversion period.

In NZ we can introduce product to a range of markets as we meet the OMAR or expectation of any said market place----do not remove this opportunity to bring more organic production to the market in the most time and cost effective way-----and if we do introduce legislation it needs to cover all items sold as organic whether from a small producer or a non-food /fibre system.

Final comment;

I strongly oppose the introduction of an Act (Bill) and subsequent regulation.

Regards,

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Learn to ask the right question or you will get the correct answer not the right answer.