

SUBMISSION ON

National Organic Standard Regulations Proposals: Phase two

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To: Ministry for Primary Industries

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Submission
A discussion of inclusivity in the Draft Standard and a direct response to MPI's questions

Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries for the opportunity to submit on the National Organic Standard Regulations Proposals: Phase two and welcomes any opportunity to continue to work with the Ministry and to discuss our submission.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



Submission

1. Organic Horticulture

In the 2020-21 financial year, there were 18,892 ha of organic horticulture (excluding wine), producing \$143 million of fresh fruits and vegetables. This makes up 2.45% of horticulture by land area. 58% of organic products in New Zealand were exported, mostly to the United States, China, the European Union, and Australia.¹

2. Discussion Questions

Q. 1

Principles

- We've included organic principles in these regulation proposals; does this section cover the intent of organic production?
- If not, what aspects are missing?

An Inclusive Standard

Horticulture New Zealand (HortNZ) supports the Ministry's efforts to develop an inclusive National Organic Standard that works for all organic growers. We support a pathway to incorporate mātauranga Māori into the organic sector but recognise that this path is not appropriate or of interest to all growers and all consumers of organic products.

It is inappropriate to require Pākehā or Tauīwi growers who are of diverse racial, ethnic, cultural and religious backgrounds, whether born in New Zealand or abroad, to incorporate mātauranga into their certification requirements. Many of these growers do not have preexisting understanding of the mātauranga Māori or te reo Māori concepts presented in the draft Standard, nor does that lack of understanding prevent them from growing organic produce. While cultural understanding is an admirable goal, a technical standard for produce certification is not the avenue to promote that aim.

The purpose of organic certification is to provide consumers with confidence that their fruits and vegetables were grown without synthetic inputs in an environmentally sustainable manner. Over half of New Zealand's organic products are exported overseas² and our export partners are unlikely to see the Hua Parakore principles as a priority.

¹ Organics Aotearoa New Zealand (OANZ). *Time for Action: 2020/21 New Zealand Organic Sector Market Report*. Accessed online 10/07/23.

https://drive.google.com/file/d/1u_F8Ys3Xzpq3YFndIMzcj7ODoNE2E-k/view.

² Organics Aotearoa New Zealand (OANZ). *Time for Action: 2020/21 New Zealand Organic Sector Market Report*. Accessed online 10/07/23.

https://drive.google.com/file/d/1u_F8Ys3Xzpq3YFndIMzcj7ODoNE2E-k/view.

MPI must be careful not to impose excessive certification requirements on organic growers, who are already managing extensive regulation under the Food Act, the RMA, and the new Freshwater Farm Plan requirements.

MPI should ensure that whichever approach they decide on allows for equivalency standards with our primary trading partners, so that the New Zealand organic sector can self-sustain through exporting produce.

Our Recommendation

HortNZ recommends that the Standard adopt the internationally recognised IFOAM principles³ and a cultural principle based on the Pacific Organic Standard⁴ that does not impose spiritual requirements.

This approach recognises the racial, ethnic, cultural and religious diversity of organic growers and allows them to come to the work from their own value system.

All operators in relation to the production of organic products, must take into account the following organic principles:

IFOAM Principles	Mātauranga Principle
<p>Principle of Health: Organic agriculture should sustain and enhance the health of soil, plant, animal, human and planet as one and indivisible.</p>	<p>Principle of Culture and Traditions: Organic agriculture should recognise the value of contributions from traditional agriculture and Māori culture, including the whakapapa, mana, and mauri of the land, soil and local cultural heritage.</p>
<p>Principle of Ecology: Organic agriculture should be based on living ecological systems and cycles, work with them, emulate them and help sustain them.</p>	
<p>Principle of Fairness: Organic agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities.</p>	
<p>Principle of Care: Organic agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and</p>	

³ Accessed online 10/07/23. [The Four Principles of Organic Agriculture | IFOAM](#)

⁴ *Pacific Organic Standard*. 2008. Accessed online 11/07/23. [LRD_TR_Organic_standard_Eng.pdf \(pacificfarmers.com\)](#) (p. 4)

future generations and the environment.

Alternative Relief

If the IFOAM principles are not adopted verbatim, HortNZ requests that the principles are structured underneath the IFOAM headings, and the following principle is clarified to encourage soil biodiversity.

“Healthy ecosystems encourage **soil** biodiversity and foster the health of plants, animals and people.”

Monoculture orchards like kiwifruit can be organic and managed sustainably while contributing to soil health, without growing multiple crop varieties.

Clarifying the Purpose of the Principles

At present the draft Standard calls for organic producers to “take into account” the principles. The Standard should be explicit whether growers’ adherence to the principles will be measured or reported and if so, how. If the cultural principles remain as drafted by MPI, it would be unreasonable to expect Taiwi growers to interpret and respond to the Hua Parakore principles without imposing additional financial expectation to engage cultural consultants.

HortNZ recommends that organic operators are not evaluated against the principles as the principles should be reflected throughout the technical requirements of the Standard already.

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| Q. 2 | Definitions |
| | <ul style="list-style-type: none">• Indicative definitions have been included in these regulation proposals; does this clarify terms used in this document?• Do you have any outstanding concerns? |

HortNZ continues to seek a definition of organic to clarify the scope and purpose of the Standard.

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| Q. 3 | General |
| | <ul style="list-style-type: none">• At the high level do you support the amendments that have been made?• Is there anything outstanding that you would add or remove? |

HortNZ continues to seek clarification whether this standard applies to imports and if so, how. This is particularly relevant for the cultural considerations within the Standard. We ask that MPI not impose stricter Standards on domestic organic operators than importers.

We still seek allowance for container growing in natural media like coconut coir and peat without soil or compost, as is common practice for strawberry growing. As discussed in our previous submission, crops like strawberries are unsuitable to grow organically at scale in the soil due to unrelenting pest and disease pressure. Growing

on a tabletop in a growing medium provides far better labour conditions for workers, allowing them to pick ergonomically rather than harvesting fruit at ground-level. The Standard should allow organic growing media, independent of soil and compost, for both these pest and work-safety reasons.

The phrasing of 1.7 Water Management still does not make sense since water itself is simply an element and cannot be made “appropriate”. The way you use water, however, can be intentional. We recommend swapping “water” for “water management systems” to convey the appropriate meaning as shown below.

“Water **management** must be fit for purpose to ensure appropriateness for use.”

We support MPI’s amendments to the Compost section that made the requirements more practical by acknowledging that some prohibited substances can be neutralised by the composting process. We also support the amendment to Section 2.3 Variety which are less prescriptive to allow for growers to make the right crop choices for their own growing systems.