

# SUBMISSION ON

# Organics Standards Notice Tranche 3

31 March 2026

**To:** Ministry for Primary Industries

**Name of Submitter:** Horticulture New Zealand

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# OVERVIEW

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## Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries for the opportunity to submit on the Organics Notice Tranche 3 and welcomes any opportunity to continue to work with MPI 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

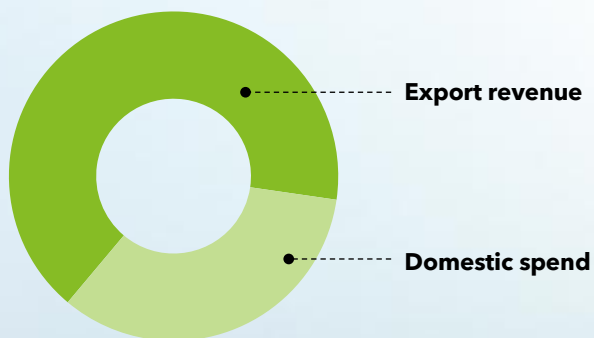
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are 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.



**Industry value \$7.54bn**  
**Farmgate value \$4.89bn**  
**Export revenue \$4.99bn**  
**Domestic spend \$2.55bn**

Source: HortNZ Annual Report 2025

# Submission

## 1. Maintaining implementation pace to support organic exports

HortNZ urges MPI to continue implementation as planned (and at pace) despite any proposed change to the EU deadline. We note that the development of the Organics Act and associated regulations has taken many years of work. Part of this was to be in a stronger position to negotiate market access, particularly in the European Union (EU).

Fruit and vegetables are New Zealand's largest organic category, worth \$244.7 million in 2024, accounting for over 40% of organic exports. Kiwifruit, apples and pears are major contributors, with organic kiwifruit earning export revenues of over \$141 million in 2023-24.<sup>1</sup>

## 2. Overall comments

### 2.1. Practical guidance and support is critical for the organics regime

To ensure the organic sector transitions away from industry-led private standards to becoming a government regulated system smoothly, HortNZ takes an interest in the policy and proposed operational requirements for the implementation of the incoming regulated organics regime, particularly as the new system is implemented. HortNZ has made several submissions on the organics proposals consulted on by MPI, since 2023.

HortNZ urges MPI to take the needs of the sector into account for implementation of the regime. The sector is moving from industry/private schemes with some government oversight, to a fully regulated sector with associated costs. Industry will want to comply with all rules and regulations, and MPI's role as the regulator is about ensuring clarity with requirements. The industry ranges from large organisations with the right support systems, through to smaller operators who will need help and advice to prepare.

There are now many documents already that have been consulted on by MPI: the Act, Regulations, Standards, Notices, and potentially template organic management plans. All these documents need to be brought together in a simplified way. As per when the Food Act was implemented, MPI needs a service user approach where the needs of the sector are anticipated and what it means for the grower is clearly articulated.

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<sup>1</sup> [Market Report 2025 – Organics Aotearoa New Zealand](#)

This includes clearly outlining all operational and administrative process, from the point of view on an operator or exporter. This should also include an explanation of terms and definitions, and how roles in the new system may change – for example, instead of Independent Verification Agencies (IVAs), these are now ‘recognised agencies’.

In addition, guidance on how the Organics Act requirements links in with other MPI legislation including the Food Act, is required.

## **2.2. Flexibility to meet organic management plan requirements**

HortNZ welcomes the development of template organic management plans if this then makes it easier for industry to comply with requirements. However, we recommend this shouldn't be overly descriptive.

HortNZ requests MPI provides for flexibility as to how operators meet the requirements of national organic standard. If operators have a format other than the template document, then as long as this covers all requirements, it should be accepted.

HortNZ understands a lot of work went into developing the standards using current industry standards. The industry already adheres to these requirements to gain organic certification, and the requirements seem largely similar. These standards have worked for decades. Recognition of industry schemes where relevant should also be incorporated into the template, where possible.

## **3. Specific Comments on the Notice**

### **3.1. Mapping requirements should allow flexible formats**

The Notice requires the ‘boundaries and layout of an operator’s operation must be defined on a map, and the map may comprise one or more maps as long as they can be read together’. This requirement aligns with requirements in other legislation, such as a farm map for freshwater farm plans. The main additional requirement for organic farming is to specifically label systems for conventional, conversion, and organic.

HortNZ notes growers utilise different mapping tools and use different software so there needs to be an ability to accept a range of mapping formats, and the map should not be duplicating other requirements.

HortNZ requests that the format is not specified i.e. not duplicating and creating a distinctive second duplicative set of requirements (notwithstanding the requirement for specifically labelled systems for conventional, conversion, and organic). For example, a large farm has a Farm Environment Planning Tool which could be ‘live’; but they should be able to submit using a ‘static’ screen shot.

### **3.2. Buffer zones**

The Notice outlines that environmentally sensitive areas and associated buffer zones must be identified on a map, as required under the Organic Standard Regulations.

However, in the context of organic production, buffer zones also need to consider separate buffer zones between conventional and organic production. The Notice also needs to

consider and anticipate the passing of the Gene Technology Bill, and the buffer zones that will then be required for this.

HortNZ recommends amending the Notice to make these requirements explicit.

### **3.3. Clarify scope of supply chain traceability**

Section 2.1 (7) (g) under the 'Official Assurance application' seems to potentially indicate full traceability. It states the application for the official assurance must contain the following information: 'the identifying information and recognised entity of each operator in the supply chain'.

If this is to include all operators, such as transport operators, this would indicate a substantial change for the organics horticulture industry as this is not what occurs currently. If this is proposing a similar approach to full supply train traceability as what occurs for animal products, HortNZ considers this is not necessary; does not add value; and would add cost and complexity to requirements. It would be difficult to include operators beyond the packhouse or orchard.

HortNZ requests further clarification as to who is captured by this requirement, and why. If it is intended to be a wider than current practice, it requires amendment or clarification.

## 4. Specific amendments to the Notice

The specific amendments that HortNZ seeks to the Notices are outlined in the Submission Table in Part 3 of this submission.

## Submission table on Organics Standard Notice - Tranche 3

Without limiting the generality of the above, HortNZ seeks the following decisions on the Organics Standard Notice - Tranche 3, as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/oppose	Reason	Decision sought
Section 1.2 Defining boundaries and layouts	Support in part	Clarity required that different formats and tools are acceptable.	A statement similar to <b><u>'for the avoidance of doubt, requirements for boundary maps under other legislation and schemes can be used for this purpose, and a number of different formats or tools are acceptable'</u></b>
Section 1.2 (3)(g)	Amendment required	Buffer zones should include separation of conventional; conversion and organic; and also allow for any future gene technology legislation.	g) environmentally sensitive areas and buffer zones <b><u>h) conventional, organic and conversion buffer zones</u></b> <b><u>i) if required, buffer zones between organic and any crops allowed under the Gene Technology Bill/Act and regulations</u></b>
Section 1.2, Clause 4 (a)(ii): 'identify what the production unit is used for'	Amendment required	It is unclear what this means in the Notice, e.g. does it mean specific crops, or growing? If it means the definition in the Regulations (a site	'What the production unit ( <b><u>as defined in the Regulations</u></b> ) is used for'

		within operation boundaries) then this should be specified.	
<p>Section 1.8 (5) 'require operator to notify the relevant chief executive of the breach as soon as practicable if the breach is reasonably likely to:</p> <p>a) Threaten the integrity of the official assurance system; or</p> <p>b) jeopardise access to overseas markets.</p>	Amendment required	This requirement is putting a lot of responsibility onto operators and requires more clarity as to the threshold.	Clarity what is notifiable; possibly in guidance for exporters.
<p>Section 2.1 (7) (g): the identifying information and recognised entity of each operator in the supply chain of the product'</p>	Amendment required	This indicates full supply chain traceability which would be a substantial cost burden for the industry.	<p>'the identifying information and recognised entity of <del>each</del> operators in the supply chain of the product, <b>as far as practicable</b>'</p> <p>Alternatively, guidance is required for exporters.</p>
<p>Section 2.1 and 2.2</p>	Potential amendment required	It is not clear what the difference is between an Official Assurance application and Statement of compliance application.	Clarity between the difference of these two statements. E.g. a statement of compliance seems to be a 'lighter' level of compliance. This could be done via guidance to exporters.