

SUBMISSION ON

Proposed product stewardship regulations for agrichemicals, their containers, and farm plastic

28 April 2025

To: Ministry for the Environment

Name of Submitter: Horticulture New Zealand

Supported by: NZ Apples & Pears, NZ Blackcurrants, NZ
Kiwifruit Growers, NZ Kiwiberry Growers, NZ Tamarillo Growers
Association, Passionfruit NZ, Pukekohe Vegetable Growers
Assoc., Strawberry Growers NZ, Summerfruit NZ, Tomatoes NZ,
Vegetables NZ

Contact for Service:

Emily Levenson
Environmental Policy Advisor
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Ph: 027 305 4423
Email: Emily.levenson@hortnz.co.nz

OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Submission
Support for the scheme

Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for the Environment for the opportunity to submit on the Proposed product stewardship regulations for agrichemicals, their containers, and farm plastics and welcomes any opportunity to continue to work with Ministry for the Environment 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

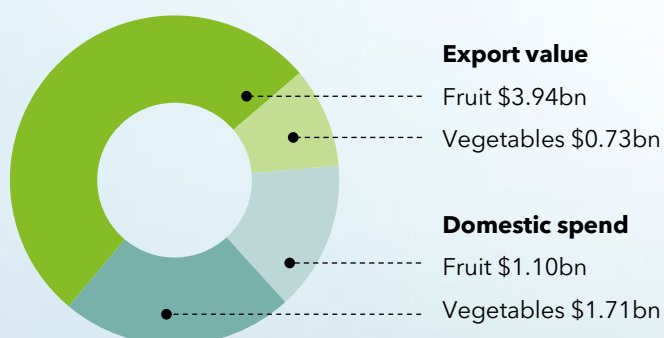
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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 \$7.48bn

Total exports \$4.67bn

Total domestic \$2.81bn

Source: Stats NZ and MPI

Submission

1. Support for a Regulated Scheme

HortNZ supports the introduction of regulations to enable a national scheme for farm plastic recycling. Agrecovery, the main providers of this service, have been advocating for these regulations to support the financial sustainability of their work. HortNZ is a trustee of the Agrecovery Foundation and signed a recent letter to Government supporting this initiative.

Many growers have used and benefited from the Agrecovery scheme for the past 17 years, which allows them to recycle their agrichemical containers and other plastic waste at low cost. Without the farm plastic recycling offered by Agrecovery, the alternative would be sending that plastic to landfill, burying it or burning it.

Agrecovery's work is currently funded by a voluntary fee on the manufacturers or importers of agrichemicals and farm plastics. The Government's proposal will make the fee mandatory for these plastic producers, eliminating the free rider problem. This way, plastic-producing companies all collectively pay in advance for the recycling of their waste.

The Government's proposal will enable the new national scheme to collect the resources to eventually expand the plastics eligible for recycling and improve access and adoption. This will expand the services available to growers, working toward a "one-stop shop" and better value for farm plastic recycling. HortNZ supports that some of the funds from the expanded fee will go toward advertising and pursuing more widespread adoption of the scheme.

2. Cost to Growers

Of most importance to our industry, the scheme will remain low cost and voluntary for growers to drop off their items to recycle. Growers will not be regulated under this scheme – only the distributors of in-scope agrichemicals and farm plastics. This is an excellent initiative to further improve the environmental sustainability of our sector, for the good of the local environment and to meet the expectations of export markets.

While this mandatory scheme means that the fee will be passed onto the growers who purchase agrichemicals and farm plastics, many growers already pay this amount from the companies who voluntarily participate in Agrecovery. In addition, the fee is small, expected to be less than 1% of final product price for agrichemicals or fertiliser bags. Without the mandatory fee, Agrecovery is concerned about its future financial viability, which means that farm plastic recycling could become much more difficult for growers.

3. Recommendations to Government: Considering Future Benefits and Providing Lead-in Time

The Government's cost benefit analysis for this policy proposal should weigh the future benefits of a comprehensive plastic recycling scheme beyond just the four initially regulated plastics. The better Agrecovery's financial stability, the more possible it will be for them to widen their offerings, keeping all kinds of agricultural and horticultural plastics out of landfill. In the future, wider coverage and more drop-off points would be a positive outcome.

The mandatory fee should come into place before the new scheme is required to be fully operational. This lead-in time will allow the responsible organisations to build up funds to pay for the necessary infrastructure to expand their services.

4. Farm Plastics in Horticulture

A variety of plastics are used by fruit and vegetable growers for the normal, day-to-day functioning of their orchards and farms. Examples include containers for agrichemicals, hail netting, tunnel houses and irrigation tubing. This plastic is necessary for growing, so practical and environmentally responsible solutions for disposal and recycling are important to growers.

Recycling agrichemical containers through Agrecovery is a requirement of New Zealand Good Agricultural Practice (NZGAP). NZGAP is an industry assurance scheme which allows growers to meet market and regulatory requirements for food safety, social practice and the environment. Growers who sell domestically through major retailers are required by those retailers to have NZGAP certification. This requirement contributes to the uptake of Agrecovery's recycling services in the horticulture industry.

Agrecovery is specifically working toward expanding its offerings for horticultural growers. They have already rolled out kiwifruit orchard and packhouse services to start recycling hail netting, string and ground covers. Their plan is to expand these offerings to the pipfruit industry next.

Discussion Questions

This section responds directly to the consultation questions.

Q. 5	Do you support a national take-back and recycling scheme for agrichemicals, their containers, and farm plastics?
YES	
Q. 6 (a)	Do you support the proposal to only allow sale of the following products in accordance with an accredited product stewardship scheme?
<ul style="list-style-type: none">• Agrichemicals sold in containers and drums of 1,000 litres or less (including household pest and weed control products). YES	

	<ul style="list-style-type: none"> Plastic bale wrap and silage sheet. YES Small plastic bags (40 kilograms or less when full) containing products such as seed, feed, fertiliser, soil and crop inputs, farm and animal supplements. YES Bulk woven polypropylene bags (over 40 kilograms when full) containing products such as seed, feed, fertiliser, soil amendments, minerals and bulk nutrition. YES
Q. 7 (a)	<p>Do you support the proposal to set a product stewardship fee on the following imported or domestically manufactured products, to cover their end-of-life management?</p> <ul style="list-style-type: none"> Agrichemicals sold in containers and drums of 1,000 litres or less (including household pest and weed control products). YES Plastic bale wrap and silage sheet. YES Small plastic bags (40 kilograms or less when full) containing products such as seed, feed, fertiliser, soil and crop inputs, farm and animal supplements. YES Bulk woven polypropylene bags (over 40 kilograms when full) containing products such as seed, feed, fertiliser, soil amendments, minerals and bulk nutrition. YES
Q. 10	<p>The following products are out of scope of the regulations proposed through this consultation.</p> <p>However, they may be considered for regulation in future. Do you support their inclusion in a regulated product stewardship scheme in future, subject to further government consideration?</p> <ul style="list-style-type: none"> Irrigation piping. YES Shrink/pallet wrap. YES Tunnel house covers. YES Wool fadges. YES Potted plant pots. YES Vineyard netting. YES, for similar products used in horticulture. Hail netting and other coverings. YES Other agricultural plastic products. YES, woven polypropylene bags under 40 kg (used for fertilisers), bird exclusion netting (similar to vineyard netting), white reflective mulch and silver reflective mulch.
Q. 11	<p>Do you support the proposal to require the product stewardship organisation to provide a take-back service for in-scope products, and to prescribe requirements for that service (eg, that the collection network covers enough of the country)?</p> <p>YES, HortNZ supports a requirement that the extent of coverage does not decrease, since the introduction of a mandatory fee should enable increased access.</p>