

SUBMISSION ON

Organics Standard Notice – Tranche 1

2 December 2025

To: Ministry for Primary Industries

Name of Submitter: Horticulture New Zealand

Supported by: NZ Persimmon Industry Council, TomatoesNZ

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
Overview of HortNZ's positions on the Notices
- 3 Part 3: Submission Table
Detailed commentary on the Notices

Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the Organics Standard Notice - Tranche 1 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

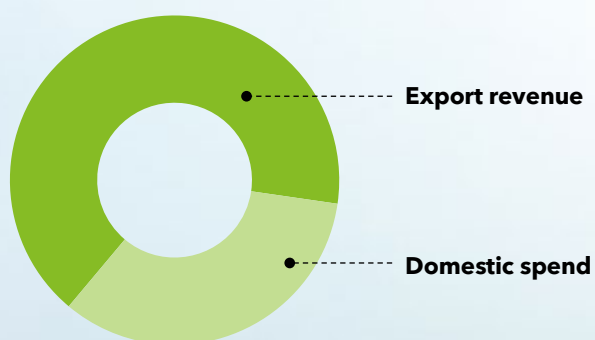
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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. Horticulture and organics

Fruits and vegetables are New Zealand's largest organic category, worth \$244.7 million in 2024, accounting for over 40% of organic exports. Kiwifruit and pipfruit (apples and pears) are major contributors, with organic kiwifruit earning export revenues of over \$141 million in 2023-24.¹ Organic horticulture and cropping cover 25,719 hectares of production.²

HortNZ takes an interest in policy that affects organic fruit and vegetable growers. HortNZ previously submitted on both phases of the National Organic Standard consultation³, both phases of the Organics Cost Recovery consultation⁴ and participated in conversations with MPI about the new organic system.

2. The new organic system

The Organic Products and Production Act 2023 (**the Organic Act**) sets up the system to provide for a national organic standard. Previously, New Zealand had several voluntary standards, which created problems for trade recognition. In particular, the European Union changed their organic legislation and now require equivalence to be established before a deadline in order to continue accepting New Zealand organic products.

MPI is consulting on the Organic Standard Notices (**the Notices**) under the Organic Act and the Organics Standards Regulations. These notices form the details of the standard that organic operators will be audited against to maintain their certification. In general, HortNZ supports the development of the Notices. We have some suggestions for amendments to improve their content.

3. Seeking alignment and reducing duplication

The Notices under the Organic Standards Regulations 2025 (**the Regulations**) should align with existing New Zealand and international organic certification requirements that are already in use and trusted by our growers, consumers and trade partners.

HortNZ is concerned that the Notices and Regulations duplicate requirements that already exist, or soon will, for growers under other regulatory and market regimes, including the Food Act, Freshwater Farm Plans and industry Good Agricultural Practice (**GAP**) schemes such as New Zealand GAP and GLOBALG.A.P. For mixed farming systems, growers have to complete additional compliance for non-horticultural products.

¹ Zespri

² OANZ. [2025 Organic Sector Market Report](#). Accessed 01/12/25.

³ HortNZ. [Submission on the National Organic Standard](#). 16 June 2023, [Submission on the National Organic Standard Regulations Proposals: Phase two](#). 13 July 2023.

⁴ HortNZ. [Submission on Cost Recovery Proposals Under the Organic Products and Production Act 2023](#). 17 July 2025, [Submission on Organics Cost Recovery - Revised Model](#). 31 October 2025.

From the grower perspective, these requirements are cumulative in terms of cost and time. Even when the requirements are similar between schemes, growers must prepare for separate audits, often without the support of in-house compliance staff. This takes growers away from their primary job, which is to grow food to feed people, and it takes money away that could be used for environmental or productivity improvements. It is also inefficient, as it creates duplication within the regulatory and market assurance systems.

HortNZ is open to talking with MPI about how to streamline and reduce duplication of these compliance obligations, including through effective recognition of industry assurance schemes and aligning the timing of audits. A streamlined way for growers to register and report across all of their compliance requirements would make a huge difference, but HortNZ recognises that this is well outside the scope of this consultation.

4. Notices' alignment with the Food Act

Where there are contradictions between the organic compliance system and the Food Act, the Food Act should prevail for food safety reasons.

4.1. Packaging

For fresh and processed fruit and vegetable products, packaging can play an important role in keeping food safe and suitable to eat, particularly given the perishable nature of the products. Growers have responsibilities under the Food Act that must be met to ensure food is safe and suitable.

For example, the Food Act deems that "Food is unsuitable if it...has packaging that is damaged, deteriorated, perished, or contaminated to the extent of affecting the food's reasonable intended use."⁵

The Food Regulations 2015 require that, "The operator must ensure that food-related accessories—

- (a) are able to maintain the safety and suitability of food (to the extent that maintaining the safety and suitability of food is their intended use)"⁶.

The Food Regulations 2015 also require that, "The operator must ensure that –

- (a) any temperature, humidity, atmosphere, or other condition necessary for the safety or suitability of food is maintained while the food is being transported; and
- (b) corrective action is taken if food is not transported in a manner that maintains its safety and suitability"⁷.

HortNZ is concerned that a requirement under the Notices for reusable, recyclable, biodegradable or compostable packaging would either:

⁵ Food Act 2014. S12(5)(e)

⁶ Food Regulations 2015. S25(a)

⁷ Food Regulations 2015. S75(1)

- remove organic growers' ability to use appropriate packaging to prevent spoilage or
- introduce a burden of evidence on growers to prove that they have exhausted all alternative packaging options before deciding on an option that cannot be biodegraded, composted, recycled or reused.

A specific example is the need for frozen products to be transported in bins with plastic liners.

As such, HortNZ seeks that the requirement for packaging to be reusable, recyclable, compostable or biodegradable under section 2.15 of the Notices is deleted, or alternative relief is provided to resolve these concerns.

5. Specific amendments to the Notices

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 1

Without limiting the generality of the above, HortNZ seeks the following decisions on the Organics Standard Notice - Tranche 1, 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	Position	Reason	Decision sought
2.7 Design, construction, and use of facilities and production equipment	Amendment required	This standard is more prescriptive than existing organic standards, and at the same time, it is not clear how some clauses are connected to achieving the organic principles. It also appears to duplicate requirements from the Food Act, particularly with regard to the need for cleaning and sanitisation to ensure food safety. Where it is unclear how clauses relate to the principles under s9 of the Regulations, we suggest that they are deleted. The use of the word "must" in clause (1) suggests that if a pest is ever found in a facility, the operator could fail their audit. Instead, the word "should" is more appropriate, in line with the	(1) The design and construction of facilities and production equipment must <u>should, as far as practicable,</u> ensure that the facilities and equipment: a) are accessible for maintenance, cleaning, operation, monitoring, inspection, and verification; and b) minimise the contact of contaminants (such as rubbish or cleaning compounds) with any compliant product, input, or other thing used in the production or processing of compliant products <u>are designed to prevent the contamination of food and food contact surfaces by prohibited substances, non-organic ingredients, pests, disease-causing organisms, and foreign material⁹;</u> and

⁹ Assure Quality Organic Standard, clause 6.6.6

	equivalent AssureQuality standard⁸, and the word “minimise” can be used rather than “prevent” in 1(c). It is not clear how an operator could be audited against a requirement to design and construct facilities/equipment to prevent the accumulation of contaminants or reduce the need for inputs for cleaning and sanitisation, as in 1(d) and (e). For example, would an operator need to provide evidence that they have continued to reduce cleaning inputs year-on-year, every year? Preventing the contamination of food and food contact surfaces is a clearer standard to measure against. There seems to be a tension between the regulation’s requirements to reduce the use of cleaning inputs while also preventing contamination and maintaining food safety. If an operator can prove to an auditor that their product is not at risk of contamination and that their processes for managing that risk are appropriate, it is not clear why they should also show that they “provide sufficient working	c) prevent minimise access by, and the harbouring of, pests; and d) prevent the accumulation of contaminants; and e) reduce the need to use inputs for cleaning and sanitisation. (2) The design and construction of facilities and production equipment must provide sufficient working space to: a) allow for appropriate production and processing activities; and b) enable the monitoring and verification of production and processing activities; and c) prevent the contamination and deterioration of inputs, ingredients, and compliant products before and during production and processing.
--	---	--

⁸ Assure Quality Organic Standard, clause 6.6.6

		space" to do those things, as in (2). Presumably, achieving those outcomes would suggest that there is sufficient working space to do so.	
2.8 Managing risks to product compliance with organic standard	Amendment required	It's not clear what constitutes a critical non-compliance under 2.8(1)(b). This should be laid out very clearly in the notices.	Define critical non-compliance.
2.11 Soil health and fertility	Amendment required	A definition is needed for the term "green manures", since there are multiple understood meanings for this term. Alternatively, a more specific term like "cover crops" or "service crops" could be used. The term "intercropping" is better understood than "companion planting". It is not clear what is meant by "non-animal" material, so (1)(i) should be deleted, or the term should be defined.	Define green manures. Amend 2.11 as follows: (1) The maintenance of soil health and fertility must be achieved by using one or more of the following methods... c) selection of optimum planting dates: d) cultivation of green manures and living mulches: e) intercropping companion planting: f) mixed cropping: g) establishment of suitable understorey plants, or under-sowing: h) incorporation of composted manure: i) incorporation of non-animal material: j) grazing by livestock...
2.15 Packaging	Oppose	This clause raises concerns about managing perishability, shelf life and food safety. There are some products which require transportation in plastic	Delete 2.15 or provide alternative relief where packaging is necessary to meet the requirement for safe and suitable food under the Food Act 2014.

		linings or plastic packaging to manage perishability, such as frozen fruit and vegetables. Growers should not be held responsible if New Zealand does not have the capability to recycle packaging where alternatives do not exist. A pathway must be provided for packaging that is essential for food safety and preserving shelf life. Requirements for packaging to be clean and free of contamination under the Standards are supported.	
General comment	Amendment required	There must be a pathway for compliance when requirements under the Organic System conflict with the Food Act requirement to provide safe and suitable food. Food safety should take priority, particularly with regard to packaging and compost use.	Uplift food safety as a priority within the Notices.