

SUBMISSION ON

EPA Proposed Prioritisation Framework Survey

30 January 2026

To: Environmental Protection Authority

Name of Submitter: Horticulture New Zealand

Supported by: New Zealand Apples & Pears,

Strawberry Growers New Zealand, Tomatoes New Zealand,

Persimmons Industry Council

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks the Environmental Protection Authority (EPA) for the opportunity to respond to the "Survey on Proposed Prioritisation Framework for Hazardous Substances Applications" and welcomes any opportunity to continue to work with the EPA and to discuss our submission.

The details of HortNZ's submission and response is 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

HortNZ's involvement with crop protection regulation

On behalf of its grower members, HortNZ works to help ensure that the regulatory settings and services that affect the availability and affordability of crop protection products in New Zealand are appropriate, workable, and cost effective.



Executive Summary

Horticulture New Zealand (HortNZ) welcomes the opportunity to respond to the "Survey on Proposed Prioritisation Framework for Hazardous Substances Applications". This is timely as access to new, targeted, and softer crop protection products is lapsing behind the phase out of older and broad-spectrum crop protection products.

HortNZ appreciates and supports EPA's initiatives alongside their business-as-usual work to reduce the application queue, increasing resourcing, and to implement recommendations from the Agricultural and Horticultural Products Regulatory Review¹ (AgHort Review).

This submission makes the key points and recommendations:

- **Unclear on practicality of prioritisation framework in this form** - HortNZ supports prioritisation in principle however does not believe the proposed framework and criteria will deliver its intended outcomes of streamlining processes and improving access to softer products for the horticulture sector's gaps equitably.

Recommendation 1: We recommend conducting a targeted and short-term pilot test in 2026 with anonymised results to better understand if it is feasible and practical before providing specific feedback.

Recommendation 2: EPA to continue focusing efforts on improving the existing framework and fully utilising overseas regulators' assessments where applicable to facilitate application processing.

- **Robust Industry Engagement** - Meaningful engagement with industry is essential to ensure a prioritisation framework reflects real-world needs. Industry input can help identify high-priority areas, practical implementation challenges, and opportunities for refinement. The final framework must support innovation and ensure that urgently needed alternatives—particularly for substances under reassessment or phase-out are not delayed.

Recommendation 3: EPA to schedule a working group meeting to discuss stakeholder feedback on the proposed framework, demonstrate pilot test results, and identify a way forward. Further, HortNZ can provide the EPA and the Ministry for Primary Industries (MPI) with pan-sector critical gaps to inform and assist any prioritisation framework development.

¹ [Agricultural-Horticultural-Products-Regulatory-Review-full-report.pdf](#)

- **Alignment with the ACVM Prioritisation Framework** - Consistency across regulatory systems is essential. The HS prioritisation framework should align with the Agricultural Compounds and Veterinary Medicines (ACVM) prioritisation framework to ensure a coherent regulatory approach between the two regulators that are needed to register a crop protection product, avoid duplication, and improve transparency for applicants and stakeholders.

Recommendation 4: Develop any prioritisation framework together with MPI as both frameworks should produce consistent priorities.

Crop protection - Strategic context

New Zealand's horticulture industry has been facing a problem of dwindling crop protection products for many years due to older products being phased out, newer products not becoming available, and increasing issues with pests, diseases and weeds developing resistance to remaining products.

Aotearoa Horticulture Action Plan

Key priority 1.3 in the Aotearoa Horticulture Action Plan (AHAP)² sets out the agreed aspiration to *increase crop protection, management and biosecurity tools*. Fit-for-purpose regulatory settings that allow New Zealand growers to access globally approved sustainable chemistry and integrated crop protection tools will be critical to enhance production, meet market expectations, adapt to future growing conditions, increase food security and to move each and every crop toward the overarching AHAP goal of doubling farm-gate value by 2035.

Specifically, the below AHAP implementation actions³ apply:

- *Provide a coordinated regular, advertised, pan-sector programme for knowledge exchange with officials who work on topics related to horticulture;*
- *Combine existing information from A Lighter Touch and product groups to identify priority crop protection tools; and*
- *Implement the recommendations from the Ministry for Regulation review of the agricultural and horticultural products regulatory system.*

² The [Aotearoa Horticulture Action Plan](#) sets up a collaborative framework across industry, Māori, research providers and government to achieve the ambitious goal of doubling the farmgate value of horticultural production by 2035 in a way that improves prosperity for our people and protects our environment. The plan was developed collectively and creates efficiencies by allowing the partners to align efforts and investment towards common actions.

³ [Aotearoa Horticulture Action Plan Implementation Roadmap - Phase One \(2025-2027\)](#)

Survey Response

Below is HortNZ's pan-sector response to the survey questions on *EPA's Proposed Prioritisation Framework for Hazardous Substances Applications*. This response has been developed with grower member input.

Q1. Which of the following would describe your involvement with hazardous substance applications made to the EPA?

User or beneficiary of hazardous substance use (e.g. farmer, grower, processor)

Q2. In the context of the current assessment waitlist and other work underway, to what extent do you agree with the following statement: I support the use of a prioritisation framework for certain categories of/some applications

Agree in principle however not in this proposed framework

Q3. If your response depends on certain factors or you would like to explain it, please provide further context or elaboration here

- HortNZ supports prioritisation but finds it difficult to assess if the proposed prioritisation framework is practical and will deliver equitable access to crop protection products for the commercial fruit and vegetable sector particularly for smaller/minor, domestic-focused crops, or those products for minor use in larger crops. For example, 80% of vegetables grown in New Zealand are for domestic consumption and therefore critical to food security.
- We recommend EPA/Sapere conducting a targeted pilot test of this framework in 2026 to be able to provide specific feedback on if it is practical and achieves its intended outcomes. It would be useful if it demonstrates how the weightings would assign scores for transparency.
- As a potential alternative to the prioritisation framework to explore, we propose that a horticulture crop protection working group is established between EPA, ACVM, HortNZ, and APHANZ to collectively identify priority gaps and possible solutions.
- Clarification is sought on if this framework applies to both plant and animal health actives. If not, separate prioritisation frameworks for each domain should be developed as they differ significantly in terms of risk profiles, regulatory drivers, and stakeholder needs.

- HortNZ emphasises that consistency of prioritisation across both regulatory systems is essential. Without this consistency, a potential impact is that an active is prioritised and processed under EPA however processing is then delayed under ACVM as it is not a priority. Recommendation 9 from the AgHort Review also recommended exploring a strategic priority pathway that is aligned across both MfE, EPA and MPI (including NZFS) so that actives can receive equal priority.
- HortNZ recognises that this framework is unlikely to benefit smaller/minor crops as existing and new actives are unlikely to be registered for these crops. We emphasise that the EPA ensures that controls placed on actives are not too restrictive to be extended to other crops whilst managing risks to human health and the environment.

Q4.

To what extent do you agree that the following elements should be included in the prioritisation framework?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
Human health risk according to AdAPT tool calculation of human health risk score	<input type="radio"/>	<input checked="" type="radio"/>				
Environmental risk according to AdAPT tool calculation of environmental risk score	<input type="radio"/>	<input checked="" type="radio"/>				
Active ingredient or associated residues approved in a recognised overseas jurisdiction for similar purpose (<i>this would be defined</i>) (and not removed or declined for approval on scientific grounds)	<input type="radio"/>	<input checked="" type="radio"/>				
OR						
NZ is the first recognised jurisdiction to seek approval						

The chemistry involves a new mode of action compared to other products used for the same purpose	<input type="radio"/>	<input checked="" type="radio"/>				
The substance helps address a biodiversity (under the NZ Threat Classification list) or biosecurity risk (under the Biosecurity Strategy) or official international commitment of New Zealand (e.g. trade, emissions reduction)	<input type="radio"/>	<input checked="" type="radio"/>				
The expected economic benefit of the substance, including cost savings (or loss avoided)	<input type="radio"/>	<input checked="" type="radio"/>				

Q5.	Do you have any specific comments on the proposed elements of the framework, the specification of any element or associated or associated response scale or the proposed weightings?
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- HortNZ seeks clarification on the operationalisation of this framework and demonstration examples on how the model would work with EPA's proposed criteria and weightings in a working group.
- Newer actives are usually softer on the environment and human health so these should not be the primary drivers for being prioritised otherwise this could create another backlog in the priority queue as many Category B (existing actives) and Category Cs (new actives) would likely be eligible.
- HortNZ recommends that the drivers for prioritisation should be the alignment and economy criteria. The challenges that growers are facing are in all the proposed criteria, but they are most concerned about the indicators in the alignment and economy criteria which are:
 - Alignment
 - Active or associated residue already approved in comparable overseas jurisdiction OR NZ is first jurisdiction to seek approval - An active or associated residue already approved overseas means that the human health and environmental risks have already partly been assessed so

should be processed relatively quicker than a new active. This will mean quicker access to more crop protection tools.

- *new mode of actions* - This will increase tools in the crop protection toolbox to counter resistance for growers as part of a wider Integrated Pest Management Plan (IPM).
- *Biosecurity* - tools to address national and regional biosecurity risks in a timely manner.
- *Economy* - new tools that assist in continuing to ensure that healthy fruit and vegetables are produced sustainably while being economically viable.
- HortNZ seeks clarification on if the alignment criteria would cover critical use cases for those applications that address a gap for where there is no viable alternative, a risk of chemical resistance, or would be a likely alternative to an active on the [EPA Priority Chemicals List and Reassessments Work Plan](#). If not, we suggest adding a critical use indicator in the alignment criteria. This would allow resources to be focused on identifying suitable alternatives, rather than expending effort on a full reassessment. For example, a deferral of reassessment could be considered where there is currently no viable alternative or a resistance management issue.
- Other situations where access to a crop protection is critical includes regional-based pests, or assessments for non-commercial reasons e.g., protecting native flora and fauna.
- The economy criteria is problematic in its current form of assigning a priority score based on the larger the dollar value of the benefit/loss avoided, the higher the priority. It means that the horticulture sector, particularly smaller crops, may be less prioritised as the 'economic benefit/loss avoided' dollar value will be smaller in comparison to bigger crops/other sectors. For example, kumara has an export value of approximately \$58,000 but is of cultural significance.
- Additionally, it is difficult to quantify the economic benefits/losses in dollar value for some factors such as impact on domestic food security, or an active's contribution to a wider IPM. For example, an active is used in combination with several other actives or methods - it is difficult to single out and quantify the direct cause and effect of that active's benefit/loss. HortNZ emphasises that clear guidelines would be needed on what economic benefit/loss information is to be provided to ensure consistent decision-making around prioritisation and efficiency.
- HortNZ supports actives approved in comparable overseas jurisdictions to increasingly be processed under EPA's existing Rapid International Regulator pathway as these risks to human health and the environment have partly been assessed. Particularly for human health risks which can be managed by PPE, buffer zones, targeted spray nozzles etc. This aligns with AgHort Review Recommendation 7 for regulators to maximise their use of international regulator assessments while considering aspects unique to New Zealand.

Q6.

To what extent do you agree with the following statements?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
The prioritisation framework should be optional for applicants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The prioritisation route should only be applied to category B and C applications which require more complex (quantitative) assessments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The prioritisation framework should be self-reported against a separate template to the application itself, but subject to the kind of checks suggested	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The self-evaluated prioritisation template should be provided alongside the application and be subject to application declarations of accuracy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

The EPA should consider the prioritisation responses alongside the applications in the queue as part of its annual workforce planning



Where a clearly higher priority application is received to one on the EPA's workplan to assess, the EPA should have discretion to (re)prioritise that application in line with the intent of the tool to prioritise applications with the greatest need and highest benefit to New Zealand



The EPA should undertake certain checks of submitted information, adjust self-evaluations where necessary/appropriate and have options to seek clarification from applicants through to deprioritising misleading applications and/or penalising applicants for any misleading information



The EPA should communicate decisions made to prioritise applications with the applicant and publicly



The EPA should provide guidance on the prioritisation framework, how to complete the template and how the framework will be applied	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Applicants should be able to engage with the EPA prior to submitting applications, including to engage on their potential prioritisation self-evaluation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The use of the prioritisation framework should be reviewed after implementation and a degree of use to understand its effectiveness and consider any potential need for adjustments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q7.

Do you have any comments on any of the proposed aspects on how the framework might be applied?

- HortNZ cannot make specific feedback on this framework at this stage until a demonstration of how it would work and an impact analysis has been conducted.
- We foresee a potential impact of this framework is of a backlog in the prioritised application queue being created if many applicants are eligible or voluntary select this pathway. The resourcing of both queues would need to be considered to ensure that the priority queue's processing time is no longer than if the product had proceeded through the current 'first in-first served' application queue. HortNZ recommends further impact analysis is undertaken.
- We have concerns that this framework will add another layer to the actives/product registration process for applicants, further delaying assessment timeframes. We do not want any further barriers being put in the way of those who register the products our growers need.
- HortNZ supports EPA continuing to focus efforts on processing Category Bs (existing actives) and Category C (new actives) applications to enable access to new, innovative products or to extend existing actives for new uses.

Q8.

In informing the EPA's prioritisation, and subject to other skill requirements, approximately what proportion of resources should be allocated to applications identified through the priority route, (the remaining percentage would be for applicable resources allocated according to time of receipt i.e., current queue-based system)

- 80% = current first in, first served queue; 20% = priority queue.
- If implemented, HortNZ believes this proportion of resourcing in the initial stage is appropriate to ensure that it is equitable for applications being lodged in the 'first in, first served queue' while allowing for certain products to be prioritised. Resourcing could be adjusted as implementation reviews occur.

Q9.

To what extent do you agree with the following statements?

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

It is reasonable to expect applicants to be able to provide the benefits and economic information required under the prioritisation framework

<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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As a user (or through an industry body I belong to), I would be willing and able to provide information in order to support an applicant to provide the benefits and economic information sought under the prioritisation framework

<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Conclusion

In summary, more information and a practical demonstration is needed on how this proposed framework and criteria will be operationalised.

We have identified potential risks of inefficiency, inequitable outcomes of larger sectors being prioritised over the horticultural sector; and another layer being added to the registration process which could potentially decrease the attraction for applicants to invest in New Zealand, eventually leading to a decrease in access to new tools for growers.

HortNZ is interested and available to discuss our feedback with EPA and Sapere in a working group to identify a way forward. Further, we can provide a list of priority gaps facing our growers to assist any prioritisation framework development.