



9 April 2020

Bryan Smith
Chief Advisor
Ministry for the Environment
23 Kate Sheppard Place
Wellington 6143

Dear Bryan

Zespri and NZKGI have recently met with both the Ministry for the Environment and Horticulture New Zealand (HortNZ) regarding the incorporation of Industry Assurance Programmes (IAP) as a mechanism to deliver freshwater regulations under the Resource Management Act (RMA).

This letter is in support of those discussions as we seek to ensure that the regulations provide multiple pathways to achieve the prescribed outcomes, including better water quality for all New Zealanders. We are also seeking to ensure risk profiles and a history of meeting or exceeding regulatory requirements are considered.

Zespri and the kiwifruit industry have a track record of strong compliance and implementing programmes which ensure we not only meet environmental, food safety and social standards but exceed them as part of our commitment to helping communities to thrive.

The framework through which we deliver that is Zespri Good Agricultural Practices (GAP). Zespri GAP is based on the internationally recognised GLOBAL.G.A.P. standard and incorporates additional elements to meet increasingly demanding customer expectations. Unlike other industry assurance programmes, compliance to GLOBAL.G.A.P. is compulsory for kiwifruit growers and forms the basis of Zespri's supply agreements - all growers must comply with the standards in order for their fruit to be sold for export or on the domestic market.

It is a fundamental principle of GLOBAL.G.A.P. that local legislation must be met and where GLOBAL.G.A.P. standards are set higher, the higher standard must be met. We constantly deliver on those requirements.

Zespri's GLOBAL.G.A.P. certification framework is accredited by JAS-ANZ to ISO-17020, 17021 and 17065 and is independently certified. Growers operate to a centralised Quality Management System (QMS), implemented and managed by Zespri. The QMS outlines all standards and guidelines that must be met, inspector training and competency requirements and details the audit and inspection programmes used to verify compliance. Compliance by growers to the QMS and our production standards is verified through inspection and audit by appropriately qualified

personnel. The system and those that operate within it are independently audited by a certification body (AsureQuality) to verify it is operating as intended. The system is comprehensive and robust, and well understood by our growers.

Zespri's GLOBAL.G.A.P. framework has been recognised as equivalent under the Food Act 2014. Our requirements have been benchmarked against Food Safety Requirements and meet those of a food control plan and our certification and audit model, including our auditors, have been recognised for the purposes of ongoing verification (compliance). Similarly, our social practice standards and controls around labour compliance in the industry have been acknowledged by MBIE as industry leading. Zespri has continually adapted its GLOBAL.G.A.P. Programme to capture regulatory requirements, with the system designed to ensure we continue to implement enhanced standards.

We agree with Hort NZ that IAPs such as GLOBAL.G.A.P. and NZGAP can meet certification and auditing requirements. A pathway for full recognition of Zespri GAP as the certification framework is set out below:

1. **Freshwater Farm Plan (FW-FP):** Criteria for a FW-FP is incorporated into Zespri GAP environmental module in accordance with Part 9A of the RMA
2. **Certification:** Provided through recognition of Zespri GAP certification framework
3. **Notification to Council:** Zespri to provide required FW-FP data to regional councils
4. **Audit (Inspection):** Auditor within the Zespri GAP scheme is recognised to undertake inspections
5. **Reporting:** Recognition of Zespri corrective action process from management of non-compliance with reporting of outcomes to regulators (same or similar to that required under the Food Act 2014).

We ask that you consider IAPs like Zespri's GLOBAL.G.A.P programme as a pathway to deliver freshwater farm plans. We also seek a level of national oversight to ensure consistency in the application of the regulations across all regional councils and ask that the requirements are not overly restrictive in nature. Integration into existing IAP will reduce duplication and assist with an efficient implementation roll out.

Attached is an overview of Zespri's GLOBAL.G.A.P. certification framework which we are more than happy to meet with you to discuss in detail.

Yours sincerely

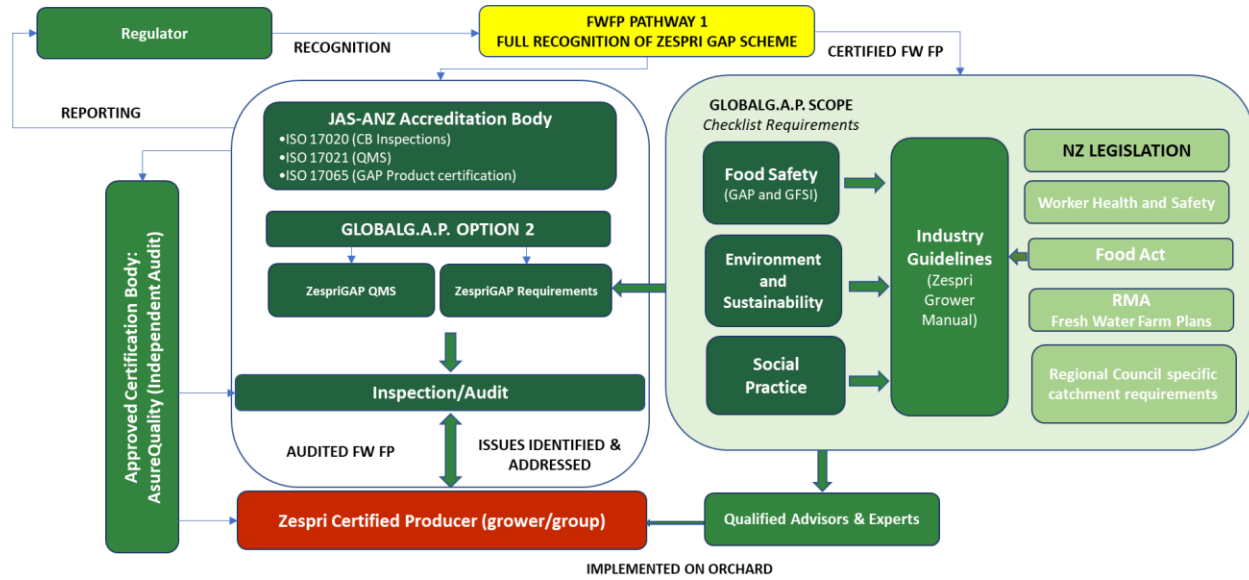


Nikki Johnson
Chief Executive
NZKGI



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Head of Global Quality & Technical
Zespri

Zespri GAP Overview



- Internationally Recognized GLOBAL.G.A.P. Framework.
- Additional reporting requirements to the Certification Body and GLOBAL.G.A.P.
- Aspects of the framework can be adapted to meet new requirements