1 July 2020

Annabelle Ellis
Water Director
Ministry for the Environment
PO Box 10362
Wellington 6143

Dear Annabelle

We are writing to you on behalf of the Kiwifruit industry in relation to the recently distributed document [Action for Healthy Waterways Information for Horticulture Growers](#) and the reference to GAP systems.

Under the section *what do I need to do - have a farm plan with a freshwater module* it states that:

Many growers already have Farm Environment Plans, as part of New Zealand Good Agriculture Practice's (NZGAP) Environmental Management System (EMS) add-on.

We would like to highlight that not all growers are certified by GLOBALG.A.P against the NZGAP programme. Both Horticulture NZ and Zespri operate to different G.A.P standards that are developed and certified against GLOBALG.A.P and New Zealand legislation requirements. This means the principles of good agricultural practice and farm plan requirements are incorporated into different programmes certified by GLOBALG.A.P.

At present, our customers do not recognise the NZGAP programme for kiwifruit export, and therefore our standards have been tailored specifically to kiwifruit for our growers and our global customers through the Zespri GAP programme. This was referenced in our submission responding to the proposed Action for Healthy Waterways rules.

As a result of this, we are reviewing the regulatory requirements for farm plans against Zespri GAP to ensure we continue to meet regulatory and customer requirements relating to freshwater. While we are factoring in the NZGAP Environment Management System add on module to our GAP review, a decision has not been made whether it will meet the needs of our industry. With this in mind, we would ask that the messaging to growers is adapted to incorporate other GLOBALG.A.P certified programmes, that would also meet regulatory requirements, to avoid any confusion.

Yours sincerely

Carol Ward   Nikki Johnson
Chair   Chief Executive
Kiwifruit Industry Water Strategy Leadership Group NZKGI