

TO: Ministry for the Environment

SUBMISSION ON: Freshwater Farm Plan Regulations

FROM: Kiwifruit Industry Water Strategy Partners

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DATE:

1. The kiwifruit industry in New Zealand

The kiwifruit industry is a major contributor to regional New Zealand returning \$2.25 billion directly to rural communities in 2020/21. There are ~2800 growers, 14,000ha of orchards, 10,000 permanent employees and up to 25,000 jobs during the peak season. Approximately 80% of New Zealand's kiwifruit crop is grown in the Bay of Plenty and the industry is expected to grow its sales to \$4.5 billion by 2025 which is an increase from \$3.58 billion in 2020/21.

2. Summary

The table below provides a summary of the key proposals that have potential implications for kiwifruit growers and the industry's response:

Proposed rule	Industry response
Transition to a fully implemented freshwater farm plan system	Does not support phasing in of FW-FP from mid-2022. Supports phasing in from mid-2023
Delivery of farm plans through Industry Assurance Programmes	Support regulation that recognises Industry Assurance Programmes to deliver FW-FP
Risk assessment	Supports specifying the minimum general requirements for a risk/impact assessment
Certification	Does not support individual certification. Supports development of a national certification framework and proposes an alternative pathway for certification and appointing certifiers
Recertification	Supports recertification every five years
Auditing	Support in part the national accreditation auditing proposal. Supports auditors being included in existing schemes
Auditing frequency	Supports a risk-based approach to audit frequency
Quality assurance	Does not support. Supports existing quality assurance framework through ZespriGAP
Enforcement mechanisms	Supports the principles of enforcement and the application of a fee

Implementation options	Supports catchment by catchment prioritisation
Reporting and review	Supports the principles of reporting priority areas

3. Horticulture NZ Submission

The industry supports the Horticulture NZ submission. While the kiwifruit industry's submission has focussed on the proposed changes that are relevant to kiwifruit, the Horticulture NZ submission has provided a more in-depth analysis of the FW-FP across the horticulture industry.

4. NZ Avocados Submission

The industry supports the NZ Avocado submission - NZ Avocados are a key contributor to the industry water strategy because there are many kiwifruit growers that also grow avocados.

5. Maori Kiwifruit Growers

Maori kiwifruit growers support any initiatives to reduce compliance, cost and time while maintaining high standards of horticulture and land care practices, and support ZespriGAP providing the platform to do this.

Maori kiwifruit growers support mechanisms that reduce the burden of compliance on owners of small land blocks and believe that Maori regional leadership, management and monitoring for farms and orchards in regard to water should be determined by respective iwi, hapu, and ahi kaa (local community) who exercise mana whakahaere (authority) and other obligations (kaitiakitanga and manaakitanga) to a particular area, water source, space and resource.

6. Water Strategy

The kiwifruit industry supports measures to improve water quality and how we manage water on orchard is a key focus for our industry, which is why in 2019 we came together to develop a water strategy¹. The strategy sets out how we will collectively protect and enhance our water resources for our people, our environment and our communities while still enabling industry growth.

To achieve this, we are looking at our use of water and strengthening our data so we can benchmark our progress. This is going to be a long-term project and we have already got some important work underway. This includes a multi-year research project in the Bay of Plenty, measuring the level of nitrogen in soil on kiwifruit orchards. The purpose of the study is to develop kiwifruit-specific models to estimate nitrogen losses which have been estimated for other kiwifruit growing regions. Estimation of nitrogen losses will be incorporated into materials and systems to help growers make better decisions on nitrogen application use and timing. The final results and report from the study are due in 2022.

The industry has invested heavily into research projects to better understand water and nutrient management and outcomes on kiwifruit orchards.

Research	Description	Status
Identify nitrogen inputs on orchards	Industry consultation/surveys	Complete
Modelling nitrogen losses in kiwifruit orchards in NZ regions	SPASMO modelling project (using findings from above project)	Complete
Assessment of OVERSEER for kiwifruit	Overseer modelling of nutrient balances in 7 kiwifruit orchards	Complete

¹ https://www.nzkgi.org.nz/wp-content/uploads/2020/09/J002013_Water_Strategy_Document_Update_R2_Final_WEB_Small.pdf

Review water requirements of kiwifruit	Literature review	Complete
Sustainable management of nitrogen in kiwifruit orchards	Orchard trials (lower N) with GET	Started 2019
Soil carbon stocks in kiwifruit orchards	Measurements in 15 orchards (spread across BOP, Northland and Gisborne regions)	Started 2020
Soil health/biology in kiwifruit orchards	Measurements in 6 orchards in BOP	Started 2020
Regenerative horticulture – collaboration with T&G & MPI	1st Stage – Industry consultation & data review	Started 2020
Tile drains in Hawke's Bay	Measurements in four orchards using flux meters and runoff plots	Started 2020
Nutrient release from compost and litter	Experimental on orchard measurements with different compost types	Started 2021
Fruit quality and storability under low N orchard inputs	Storability trial of fruit from single orchard with low N inputs	Started 2021
Cover crops trials	Assessment of benefits of cover crops in 6 BOP orchards	Started 2021
Catchment level water quality - data review	Water quality data review for Waihi and Maketu catchments	Started 2021
Validation of water needs and irrigation parameters	Three-year Irrigation optimisation trials	Started 2021

Since the strategy was established, goals have been developed that set out specific targets to protect water quality, use water efficiently, and build soil health. A road map has been created to provide a pathway to meeting the goals.²

7. General comments

While the industry supports freshwater farm plans as a key tool to improving environmental outcomes, industry support of Freshwater Farm Plans (FW-FP) is on the basis that existing systems such as ZespriGAP can be used for delivery. ZespriGAP is primarily based on the GLOBALG.A.P. standard and also incorporates other elements where GLOBALG.A.P. certification alone does not meet Zespri's customer requirements.

8. GLOBALG.A.P.

GLOBALG.A.P. is a farm assurance programme, translating consumer requirements into Good Agricultural Practice (GAP). GAP is the world's most widely implemented farm certification scheme.

GLOBALG.A.P, in addition to the core GAP standard, has add-ons which cater to different needs, sectors or market requirements - for example, the Tesco NUTURE add-on and Coop Italia Add-on. One of the most relevant to New Zealand growers – GRASP is explained in more detail below:

GRASP stands for the GLOBALG.A.P. Risk Assessment on Social Practice add-on. It is a voluntary, ready-to-use module developed to assess social practices on the farm including specific aspects of workers' health, safety and welfare.

² https://www.nzkgi.org.nz/wp-content/uploads/2021/06/Water-roadmap-Achieving-the-kiwifruit-industry-water-goals_Full-version.pdf

9. ZespriGAP

Zespri has operated a GAP group certification programme called ZespriGAP since 2002 and is independently certified to the GLOBALG.A.P. standard annually by an accredited certification body. The ZespriGAP programme combines all the requirements from customers and regulators from export markets into one set of rules so growers can meet their market, customer and regulatory requirements.

Zespri requires all supplying growers in New Zealand to maintain their certification and meet Zespri requirements as part of the supply agreement with Zespri which covers three core areas:

- People (health and safety, labour compliance)
- Planet (environment)
- Product (traceability, food safety).

To maintain GLOBALG.A.P. certification, the programme is regularly reviewed and updated to meet changes to business, customers and regulatory requirements. ZespriGAP works to provide growers with a continued social license to operate as a supplier of kiwifruit in New Zealand and abroad.

10. Existing recognition of GAP in regulation

GLOBALG.A.P. has been successful in meeting New Zealand based regulation with two examples set out below:

Food Safety

The Ministry for Primary Industries (MPI) recognised GLOBALG.A.P. certification as meeting the requirements of the Food Act 2014. GLOBALG.A.P. holds strong global recognition of its food safety standards as it is benchmarked to the Global Food Safety Initiative.

This means that industry bodies including Zespri, which provide GLOBALG.A.P. certification to growers in New Zealand, could:

1. Allow GAP auditors to obtain Food Act verifier status to carry out Food Act verifications through the 'Recognition of Classes of Persons' process
2. Use GLOBALG.A.P. audits to double as a Food Act verification
3. Provide a pass-through registration service for all growing entities, as a cost-effective alternative to registering through councils.

In this way, regulation and market requirements are supported through one assurance system eliminating compliance duplication. The outcome of this recognition process is the same - assurance that horticulture businesses are growing in accordance with national food safety standards.

Greenhouse Gas Emissions

GLOBALG.A.P. members are working with the He Waka Eke Noa (HWEN) Programme Office through the GLOBALG.A.P. National Technical Working Group to gain recognition as an equivalent IAP. An initial assessment on equivalence of GLOBALG.A.P. indicates the requirements and assurance framework are in line with the expectations of the HWEN milestones under the Climate Change Response Act 2002. It is expected that the Programme Office will grant conditional to full approval status as an equivalent Industry Assurance Programme (IAP) once it has reviewed the implementation plan and timeframes.

11. Transition to a fully implemented freshwater farm plan system

Industry position: Supports phasing in FW-FP from mid-2023

The industry is supportive of a phased approach to a fully implemented FW-FP system and Zespri is in the process of amending ZespriGAP to meet the requirements of GLOBALG.A.P. version 6 which incorporates new requirements for freshwater management, greenhouse gases, biodiversity and

environmental protection. These changes come into effect in September 2022 and become mandatory under ZespriGAP in April 2023.

Phased implementation from mid-2022 is ambitious and doesn't allow for all industries to have appropriate tools and systems in place to meet regulatory requirements. The industry supports phased implementation from mid-2023 – this will align with GLOBALG.A.P. version 6 implementation timeframes and will allow the industry to have the systems and tools in place to support growers.

12. Delivery of farm plans through Industry Assurance Programmes

Industry position: Support regulation that recognises Industry Assurance Programmes to deliver FW-FP

Zespri already has an assurance framework that will meet freshwater farm plan requirements. Using an established accredited certification model allows for faster implementation.

Under ZespriGAP, new requirements can be rolled out to a large number of growers over a short period of time. ZespriGAP can work to focus on high-risk catchments first as recommended in the discussion paper. By 2024, all growers could have a fully implemented and audited FW-FP, regardless of orchard size. GAP certification will require growers to meet stronger environmental requirements due to changes to GLOBALG.A.P. by 2023 and the FW-FP requirements will be rolled out in line with these changes as a full package covering market requirements and regulation.

How ZespriGAP will meet the requirements outlined in the regulations is set out in Appendix 1

13. Risk assessment

Industry position: Supports specifying the minimum general requirements for a risk/impact assessment (option1)

Option 1 is preferred as it allows for flexibility to adopt the most effective methodology for an orchard risk/impact assessment and for adapting risk assessment approaches as and when new technologies and research become available. This option is suitable for including into existing IAP, as it would leverage the good work already occurring and create a smoother transition.

For an IAP, it is important to have clarity on regional/catchment requirements and enough information to support growers in making decisions on what constitutes a risk.

The additional detail and guidance for risk assessment and plan development for freshwater farm plans would be developed and invested in by Zespri and built into the Quality Management System (QMS). This will allow us to consistently apply the standard across all our growers while allowing for the flexibility we need to ensure we remain consistent with GLOBALG.A.P. standards and regulations.

14. Certification

Industry position: Supports an alternative pathway for certification

We propose that the existing certification process under ZespriGAP be used to meet the requirements of FW-FP to certify the process, standard and assurance framework, in place of individual certification for each orchard. This would align with GLOBALG.A.P. already being recognised as equivalent under the Food Act 2014 in delivering to regulations.

Zespri's preference is that the existing certification process under ZespriGAP meets the requirements of the FW-FP and supports a national approach for setting the criteria for certifiers and auditors, not for accrediting and appointing them.

Under the existing certification process the standard and its assurance framework would be certified, replacing the need for an individual certification step for each orchard. It is proposed that this is undertaken by the approved auditor, as it is under the GLOBALG.A.P. standard, and all other certification frameworks. Consistency in approach is important if the industry is to avoid duplication, inconsistency and increased cost with no added value to growers.

We seek that an option for recognition similar to what we hold under the Food Act 2014 be included. This recognition deems GLOBAL.G.A.P. as equivalent in delivering to the regulations.

GLOBALG.A.P. certification in New Zealand sits within a JAS-ANZ accreditation framework and certification is done by a third-party certification body. Auditors certify growers who are performing to the standards and achieving outcomes. Ongoing certification is determined by the auditor. A national accreditation process for appointing accredited certifiers is not aligned with international assurance processes where the terms accreditation and certification are used in a very different context.

GLOBALG.A.P. accreditation and certification framework is set out in Appendix 2

Recognising existing IAP assurance frameworks such as GAP builds on assurance processes that have been in place for over 20 years, globally recognised and proven to achieve desirable results i.e. safe food, worker welfare and positive environmental outcomes. As the IAP owner, Zespri would ensure every freshwater farm plan meets the requirements of the regulations through the assurance framework of GLOBALG.A.P.

The benefits for using existing certification framework within ZespriGAP to the environment and growers are set out below:

- A certification framework additional to ZespriGAP is duplication and would provide additional cost for growers
- Accepting ZespriGAP as the certification body will allow FW-FP to be implemented across all growers rather than those 5 hectares and above
- Certification within ZespriGAP allows for industry-wide identification of non-compliance and areas for improvement, and therefore better environmental outcomes
- Additional cost and duplication of process will create a negative perception amongst growers towards the FW-FP system and they are less likely to be engaged and motivated to make improvements beyond what they are legally obligated to. They will be extremely averse to having to pay for a certification step that is not required.
- Requiring each FW-FP to be independently certified is essentially creating another completely separate compliance programme that growers have to follow. This creates additional complexity, cost, and confusion for growers and if other regulations follow the same model, then the compliance burden will be too onerous for growers
- ZespriGAP has continual monitoring programmes in place that would feed into the improvement of FW-FP for all growers. Independent certifiers are not privy to this information/industry insight so have less ability to ensure plans are fit for purpose
- Within ZespriGAP, the expectations on certification and auditing of FW-FP is more likely to be consistent, and where it isn't, corrections can be made because oversight of the process is being undertaken by the IAP
- ZespriGAP is reviewed and certified annually. Required changes to FW-FP can be implemented immediately – rather than waiting for the next certification round which could be 3 - 5 years away.

To summarise, recognising ZespriGAP as the certification body:

- Allows all growers to be included
- Allows for continuous improvement
- Minimises cost, removes duplication and unnecessary complexity and therefore grower resentment.

Recognition of ZespriGAP as an IAP or certification body does not take away the option for growers to work through their own farm plan development independently, as part of a catchment group or other if they choose. ZespriGAP is offered as a pathway to meet regulation.

For growers that choose independent development of a freshwater farm plan, NZKGI supports national accreditation of certifiers followed by regional council appointment.

15. Recertification

Industry Position: Supports recertification every five years

This would see ZespriGAP recertified every five years (or as often as needed to keep across GLOBALG.A.P updates) to continue to meet the requirements of the regulations.

Zespri runs an annual audit and inspection programme and regularly update standards to reflect national and international requirements and capture best practices. The above proposal will have minimal impact for the industry and allow the costs to be largely absorbed into existing structures.

16. Auditing

Industry position: Conditional support for option 1 - regional council appointment of auditors

This support is conditional on the recognition of the IAP auditing framework. The process for appointing auditors forms part of the GLOBALG.A.P. certification and Quality Management System (QMS) framework. This outlines competency requirements; training needs and addresses conflict of interest.

Within ZespriGAP, auditors are appointed as part of the GLOBALG.A.P. certification and QMS framework. This outlines competency requirements, training needs and addresses conflicts of interest, and Zespri manages and implements the system and processes. ZespriGAP focuses on continuous improvement on orchard which is captured and verified through our audit model.

Our preference would be to keep this approach to maintain consistent standards and minimise duplication for growers.

Zespri would also like to raise concerns over regional authority appointment of auditors. These concerns relate to consistency of service across regions. We propose MfE look at mechanisms to recognise and approve classes of people within industry assurance programmes (such as ZespriGAP) who meet specified national requirements. This would allow Zespri to efficiently provide services across the industry while minimising cost to growers. We ask that the concept of a class recognition and the use of technical experts be considered to reduce the cost of accreditation, similar to Part 4 of the Food Act 2014 s141 Recognition of Classes of Persons. Zespri would apply with appropriate process documentation for signoff to appoint and manage auditors

We seek that the approval of auditors is undertaken at the national level as part of the overall acceptance of the scheme as equivalent.

17. Audit frequency

Industry position: Supports an audit frequency risk-based approach

Audits under ZespriGAP are completed each year and our proposal is for FW-FP to be integrated into, and verified as, part of the annual process by a GLOBALG.A.P. auditor. Zespri would schedule the first audit within 18 months after the grower's freshwater farm plan is developed, as specified in the consultation document.

It's important to us that we can continue to work towards using audit to drive continuous improvements through an efficient process – which we could do through ZespriGAP.

18. Quality Assurance

Industry Position: Conditional support for the quality assurance mechanism to be overseen by a national public entity

We support a government-funded system audit to check the health of the system. However ZespriGAP has its own QMS framework and is certified annually by an accredited international certification body – we propose MfE recognises this as meeting assurance requirements.

Reporting to government by the certification body should provide a level of confidence in the system's ability to deliver intended outcomes.

19. Enforcement mechanisms

Industry position: The industry supports the principles of enforcement and the application of a fee

However we would like to see more detail around this process and suggest the following:

- i. Communication and providing adequate compliance timeframe for growers in the first instance, before an enforcement fee would apply
- ii. A high enforcement rate amount (if fixed) as it will be cheaper to not comply than pay for development, certification, recertification and audit
- iii. If the fees proposed are a daily amount (i.e. if issued under an abatement notice) then the industry suggests a smaller amount

We propose the fee is either a daily rate or a fixed fee, based on the offence. The industry would like to see more detail around what fees would apply against each offence.

20. Implementation options

Industry position: The industry supports catchment by catchment prioritisation

While the industry supports an at-risk catchment implementation approach, the government has not confirmed what the at-risk catchments are across New Zealand. This makes it difficult for industries to put appropriate plans and systems in place. The industry would like to know when this list will be released.

Proceeding with a catchment approach first does have it challenges. There will be low-risk properties that will require FW-FP before high-risk properties in lower prioritised catchments. The industry would support a pathway for at risk catchments where they are able to manage the property risks relative to that catchment.

Understanding catchment values and context

The industry agrees that individual farmers or growers should not shoulder the burden of identifying catchment values and context and agree that regional councils are best placed to achieve this however we would like to see councils working with relevant industries on data collection – eg the industry has provided nutrient leaching data to Bay of Plenty Regional council to inform land use impacts for catchments in the Bay of Plenty.

21. Multi land use

The industry is concerned that while it is expected that there will be generic parts to a freshwater farm plan – farm map, identification of land use etc at this stage it is likely that for multi land users there will be a requirement for individual FW-FP.

For example - a multi land user has the following land uses on their property – vegetables, dairy and kiwifruit. This would mean three separate FW-FP – NZGAP (EMS), Fonterra's Tiaki and ZespriGAP.

The consultation material doesn't cover multi land use and we would like the government to do more work in this area to streamline the FW-FP process across multiple industries.

The industry has considered how freshwater farm plan implementation would work for multi land users. Crops that are already under GAP schemes have a couple of options:

1. If there are multi crops that require GLOBALG.A.P. certification then these are most likely Option 1 and one audit will cover them for all crops. However certification bodies that do the audits would need to be recognised to audit the FW-FP at the same time (like they do for the Food Act).

See appendix 2 for an explanation of option 1

2. Growers under ZespriGAP and Avocados under another GAP scheme will currently have two GAP audits. The IAPs could come to an arrangement to recognise the FW-FP audit component so there is only one audit. The regulations would have to allow for this.

If the business includes both crops under GAP schemes (e.g. Kiwifruit/Avocados) as well as crops that are not under GAP schemes (e.g. berries):

1. An audit pool could be set up by the IAP that allows for auditors to be recognised to audit all crops
2. Zespri could require growers to proceed under option 1 and bring their other crops under certification or have an independent FW-FP audit as well as a ZespriGAP audit.

Growers with large businesses that cover multiple crops and other land use like dairy or forestry:

1. Zespri could require businesses to be certified/audited for FW-FP independently (by whoever is appointed under the regulations) . When they are audited for ZespriGAP, checks that the FW-FP has been approved and potentially looking at the audit outcomes. The FW-FP could be one plan to cover all operations.
2. Businesses could still have one plan to cover all operations, but Zespri would only audit kiwifruit (and potentially avocados if there was an agreement in place) and would need to see evidence that the FW-FP was being covered off under other industry programmes (e.g. Fonterra).

Currently Zespri's audit model is specific to kiwifruit and cannot yet be applied for other land use.

Note that for all options reporting to council or government would be complicated.

22. Reporting and review

Industry position: The industry supports the principles of reporting priority areas

However it is unclear how the priority areas will be reported - the industry presumes that there will be measures included in the freshwater farm plan

What councils report publicly

The industry agrees that regional councils report selected information to show progress of the freshwater farm plan system however identifiable orchard data must not be reported in accordance with the Privacy Act 2020.

Appendix 1 How ZespriGAP will meet IAP delivery requirements

1. Robust processes that meet regulatory requirements

ZespriGAP operates to the quality management standards (QMS) requirements of GLOBALG.A.P. - a JASANZ accredited standard. The QMS outlines members' responsibilities including their training and competency requirements. This includes the obligations of those operating the system and those who are responsible for providing technical advice and specialist functions within the system - for example management responsibility, certifiers and auditor capability and competency.

The QMS includes document control and record keeping, systems for the management of complaints, non-compliance management and sanction processes. This includes notification and reporting requirements, internal audit and continuous improvement processes, on-orchard and system inspections, inventory management, traceability and recall procedures and annual review of the QMS. In addition to the requirements, Zespri also provides the tools and guidelines for assessing risk and developing procedures and plans.

2. Practice standards at least equivalent to any required standards that are set in regulation or accompanying guidance

With the introduction of GLOBALG.A.P. V.6 being made available in September 2022, Zespri proposes to roll out FW-FP to all growers from 2023 onwards through ZespriGAP. V.6 will meet the requirements of the regulations which supports the phasing and implementation of FW-FP from 2023 onwards.

If a FW-FP rollout date earlier than 2023 is implemented, ZespriGAP will build on the environmental requirements already in place in GLOBALG.A.P. and set up a new environmental module for growers to include FW-FP requirements. Zespri will work with growers in at-risk catchments first to ensure plans are in place through 2022 in line with the proposed phased approach.

3. Appropriate incorporation of regional rules and any catchment-level priorities and values

Regional standards and catchment level priorities will be incorporated into the standards. The ZespriGAP programme is regularly reviewed and can be systematically updated as new requirements are set, and catchment priorities and values become known.

4. Independent quality assurance and checks and balances

ZespriGAP is certified to the GLOBALG.A.P. standard by an independent accredited certification body.

- The certification body audits the group's QMS annually and as part of this, a sample of the growers that are part of the group are also audited
- Zespri also runs an internal audit function to ensure that the QMS is implemented, and specific requirements are met
- Zespri internally audits and monitors compliance to the QMS and on orchard standards to manage outcomes/risks. This includes orchard inspections, review risk assessments and of plans, review and approval of pest monitoring and input data and targeted and random sampling and testing
- The ZespriGAP model is adaptable and is currently being reviewed to ensure it continues to meet the needs of our key stakeholders.

5. Dispute resolution processes

This is part of the GLOBALG.A.P. standard requirements for certification under the group scheme and key to the integrity of the programme. GLOBALG.A.P. stipulates timeframes for addressing

issues (non-conformances) raised during audit – this is a maximum of 28 days depending on the nature of the non-conformance.

Where a grower does not implement improvements to meet the mandatory level required, Zespri starts a sanction process. Failure to comply can result in a warning or suspension of certification and in some cases cancellation. It also allows for situations where a finding or sanction is disputed.

6. Risk assessments

Risk assessments are integral to how GAP is implemented in mitigating orchard practices for food safety and environment. They allow growers to identify the controls/measures they must apply at farm level to meet the outcomes expected of the standard. Each risk assessment informs a plan of action which is documented and updated on a regular basis to ensure any changes in practices are captured. The plans which result from the assessments drive good agricultural practice across industry and let us to measure continuous improvement against the plans.

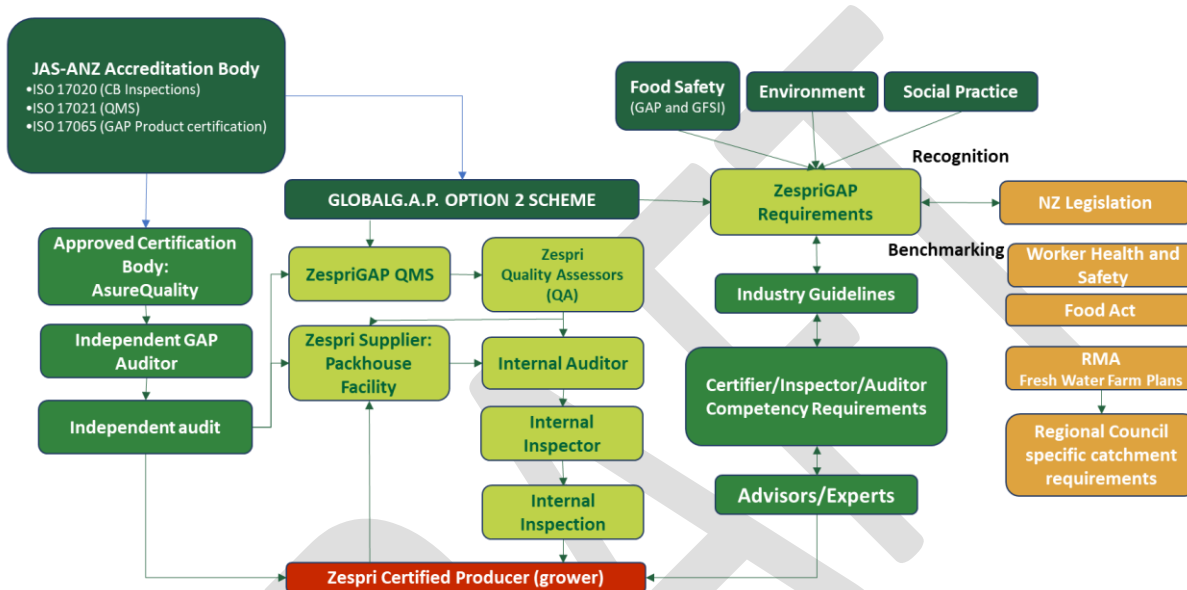
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Appendix 2 GLOBALG.A.P. accreditation and certification framework

The GLOBALG.A.P. certification framework is accredited by JAS-ANZ to the following ISO standards:

1. ISO 17020 Accreditation of Certification Bodies (CB),
2. ISO 17021 Quality Management System (QMS),
3. ISO 17065 GLOBALG.A.P. Product certification.

ZESPRI GAP GLOBALG.A.P. GROUP CERTIFICATION FRAMEWORK



The diagram above indicates the structure of grower certification. It also provides an indication for where the auditor and certification bodies sit within an internationally recognised assurance framework.

Zespri GAP operates under a GLOBALG.A.P. Option 2 group certification model with QMS. The other certification option with GLOBALG.A.P. that Zespri also accepts is GLOBALG.A.P. certification Option 1 - independent certification.

GLOBALG.A.P. certification options:

GLOBALG.A.P. Option 1: Independent certification. Growers are certified by an independent auditor, annually from one of the two accredited certification bodies in New Zealand against the GLOBALG.A.P. checklist directly.

Key points on Option 1

- Individually certified grower, audited annually through an independent third party
- Option 1 audits are carried out via an accredited certification body to certify growers against GLOBALG.A.P. standards
- Growers are also required to undergo a 1st party, self-assessment against the checklist requirements annually
- Annual audits cover a full checklist, each control point covered on site as part of the audit by trained and competent GLOBALG.A.P. auditor.

GLOBALG.A.P. Option 2: Group Certification. This model is managed through a central QMS and consists of two levels of auditing - 2nd (internal auditor) and 3rd party audits (independent auditor).

Key points on Option 2:

- One legal entity is responsible for maintaining group certification for multiple legal entities that supply fruit and/or vegetables to the single entity e.g. Zespri International operates an Option 2 group certification model scheme for around 900 kiwifruit suppliers (growers)
- Option 2 suppliers are audited through the centralised QMS which is required to ensure that the group's suppliers comply to the GLOBALG.A.P. standards in a uniform manner
- Suppliers are subject to both Internal (2nd party audit) and external audits (third party audit)
- A sample of suppliers, internal audit providers and the QMS itself are all subject to a third party audit by an accredited certification body annually to verify compliance to the GLOBALG.A.P. checklist requirements and the GLOBALG.A.P. general regulations
- Businesses in New Zealand offering Option 2 group certification provide guidance and supporting material with templates and resources to support their suppliers to meet GLOBALG.A.P. requirements and maintain certification. The support material provided is set so that it is suitable for the scope of the business and their suppliers
- Zespri sets its own guidance in the form of a Grower Manual - Crop Protection Standard Programme (covering agrichemical use), residue testing programme (covering MRL export market restrictions), templates and other resources with content that is tailored specifically for growing, harvesting and supply of kiwifruit, on orchard
- Zespri International, as a marketing company requires all suppliers with produce branded as Zespri must meet the Zespri supplier requirements, including GLOBALG.A.P.

For clarity on interpretation for terminology, the following definitions compare how ISO definitions compare with the proposals outlined in the FWFP Discussion Document:

Accreditation:

- **ISO Definition:** a globally recognised auditing process against international standards. For GLOBALG.A.P. the accreditation level sits as accreditation against the certification body, the QMS and the GLOBALG.A.P. standards
- **FWFP Definition:** a national framework for approving 'certifiers' and 'auditors'.

Certification:

- **ISO Definition:** the provision by an independent body of written assurance (a certificate) that the product, service or system in question meets specific requirements.
- **FWFP Definition:** to determine whether they are satisfied that a freshwater farm plan complies with the requirements and that outcomes are appropriate.

Auditor:

- **ISO Definition:** individual deemed competent and trained to assess systems and processes against the requirements of the GLOBALG.A.P. checklist and decides on whether or not certification is able to be assigned or not
- **FWFP Definition:** the individual that assesses whether or not the farmer/grower has implemented the farm plan on farm.