



# Regulatory priorities for New Zealand Kiwifruit Growers

## Harvesting Success for All New Zealanders

New Zealand Kiwifruit Growers Inc. (NZKGI) works to advocate, protect and enhance the commercial and political interests of New Zealand kiwifruit growers.

NZKGI is the advocacy body which represents all of New Zealand's kiwifruit growers. NZKGI was formed in 1994 to give growers their own organisation and promote a secure and sustainable kiwifruit industry.





Whetu Rolleston – Chairperson  
Colin Bond – Chief Executive Officer

The partnership between the kiwifruit industry and government has grown New Zealand's largest horticultural export. Together, we've turned challenges into progress and today, with growers thriving, the country is reaping the rewards.

The Ministry of Primary Industries Situation and Outlook for Primary Industries highlights that kiwifruit export revenue is forecast to increase 482% between 2007 and 2027, and in line with this projection, kiwifruit export revenue increased 45 % in 2024/25. Our upward trend remains strong reflecting the need to meet rising global demand. Zespri's Five Year Outlook sees New Zealand supply increase from 214 million trays in the 2025 harvest season to 236 million trays in 2030 (+10%).

We recognise that the Government is working to double the value of New Zealand's exports in 10 years and we acknowledge the progress already taken to enable improvements to the resource management system, as well as other ancillary

system changes. The resource management system is critical to the industry. Now, we call on successive Governments to deliver regulatory certainty that will continue to unlock potential and drive better outcomes for all New Zealanders.

As readers will note below, much of the reform currently proposed by the current government is broadly supported by NZKGI. What is now required is timely and effective implementation to ensure the industry can realise the full benefits of these changes.

NZKGI's vision is clear: For New Zealand kiwifruit growers to be the most successful and future-ready producers in the world. Achieving this requires your commitment to make further improvements to our regulatory systems. Our success will continue to bear fruit for the entire nation.

**Whetu Rolleston, NZKGI Chair**  
**Colin Bond, NZKGI CEO**



# Harvesting success for all New Zealanders

The future of the kiwifruit industry is bright and an essential part of New Zealand's economy as the country's largest horticultural export. New Zealand's kiwifruit industry contributes almost \$3.1 billion in direct payments to New Zealand's regions.

In 2030 the industry is forecast to provide an estimated 24,900 seasonal jobs to the economy. With a share of 12.2% of kiwifruit land, we estimate Māori kiwifruit production to be valued at \$228.5 million per year.

While momentum is strong, cutting costs in critical areas increases risk. If our hard wins

such as the RSE scheme were to fail, the impact on the kiwifruit industry could be significant - jeopardising seasonal productivity and costing growers and the New Zealand economy millions.

This document outlines the key challenges and solutions that require support to protect grower viability and their contribution to New Zealand's economy. NZKGI is committed to guiding growers through growth and change, making key decisions, and working closely with government and industry partners to build a strong, sustainable future for New Zealand's kiwifruit sector.



# Resource Management Act



New Zealand risks losing its competitive edge in sustainable food production and export growth if the regulatory settings are unfit. Current settings limit growers' ability to respond to emerging issues, plan, invest in infrastructure and innovation, and adopt new technologies.

## Enabling horticulture activities and infrastructure in resource management rules

It is widely acknowledged that the Resource Management Act 1991 (RMA) has become too complex and is stifling New Zealand's economic growth and resilience.



**Key issues for the kiwifruit industry are inconsistent planning rules across regional and district boundaries, and rules that hinder essential horticultural activities.**

*NZKGI advocates for sector-specific frameworks which provide growers with certainty to manage their land, use water efficiently and protect the environment.*

## Planning frameworks

Perennial horticultural crops such as kiwifruit are not consistently recognised or protected within planning frameworks. Without national-level recognition, local councils may prioritise short-term land-use changes, such as housing or infrastructure, over long-term crop productivity. This threatens food production and export value. *NZKGI advocates for the inclusion of the protection of perennial horticultural crops as a matter of national importance and consider a National Environmental Standard (NES) for kiwifruit to streamline approvals and reduce compliance costs.*

## Planning tools

Current planning tools do not enable essential horticultural activities such as water storage. This limits growers' ability to adapt to climate and market pressures, particularly when rules differ between regions. *NZKGI supports the extension of national direction tools to enable activities that support horticultural needs.*

## Rule variability between councils

Different councils apply different rules for key rural activities. For example, buffer zones for spraying agrichemicals, earthworks for orchard development, water take consents, and building standards (e.g. worker accommodation) and ancillary infrastructure. This creates confusion, compliance costs, and delays for growers. *NZKGI supports regulatory consistency across regional and district boundaries.*

## Land and water prioritisation

Access to suitable land and reliable water is increasingly constrained by competing land uses and inconsistent regional rules. Without national direction, councils apply different priorities for land zoning and water allocation, threatening production and limiting opportunities for orchard establishment and expansion. *NZKGI supports the prioritisation of access to suitable land and reliable water in national direction and planning instruments.*

## Horticulture-specific provisions for water allocation and nutrient management

Current water allocation and nutrient management frameworks are often designed around pastoral farming rather than horticulture. This results in 'one size fits all' rules which overlook crop specific needs such as variable irrigation demand or nutrient uptake rates, reducing productivity and efficiency. *NZKGI supports horticulture-specific provisions in frameworks for water allocation and nutrient management.*

## Land-use flexibility

Rigid planning rules restrict growers' ability to change land use or crop type in response to shifting climate patterns, market trends, or biosecurity threats. Without flexibility, growers cannot adapt to sustain production or maintain export competitiveness. *NZKGI supports the protection of land-use flexibility to respond to evolving climate conditions and crop demands.*



# Recognised Seasonal Employer Scheme

## 1. Accommodation cost methodology

The Recognised Seasonal Employer (RSE) Scheme has had an accommodation cost freeze in place since 2019. Since October 2024, employers have invested significant time and resources working alongside MBIE officials and Pacific partners in a dedicated working group to develop a practical and sustainable methodology for accommodation charges.

MBIE has provided its proposed model and recommendations to the Minister for review. Employers confirm that the model is broadly supported. However, it is essential that the methodology remains consistent with New Zealand law and accurately reflects the actual costs incurred by employers in providing accommodation. Employers support:

- The intent of MBIE's model, a structured, transparent approach to accommodation charges that aligns with RSE scheme's objectives.
- The flexibility principle which will enable providers to progress to higher levels by meeting the required criteria. This approach allows them to align offerings with standards and apply appropriate adjustments to accommodation charges.
- And remain committed to working with MBIE, Pacific partners and government to ensure the RSE Scheme delivers fair and sustainable outcomes.

### Key issues and solutions

#### Bedroom occupancy rule

The current model makes this criterion compulsory at all levels, creating a

financial dead-end for providers unable to comply, discouraging investment. NZKGI supports occupancy flexibility, allowing for the application of maximum bedroom occupancy only at the highest level and allowing for progression at lower levels, if other criteria are met.

#### Tax compliance risk

The proposed RSE Scheme accommodation cost methodology currently under consideration by MBIE could create significant tax obligations under the Income Tax Act 2007, adding complexity and cost for both employers and workers. NZKGI advocates that MBIE should seek taxation advice aligned with CS16/02 to confirm legality, as recent cases like *Soapi v Pick Hawkes Bay* have eroded employer confidence in current guidance.

#### Economic viability

The currently overly prescriptive approach ignores regional rental variations and actual costs, undermining fairness and sustainability. NZKGI supports cost alignment whereby charges must reflect actual, reasonable, verifiable costs, with CPI-linked indexation to replace freezes.

#### Investment certainty

Without flexibility and cost recovery, NZKGI is hearing reports that banks will not lend for new builds for RSE accommodation, threatening long-term RSE capacity. NZKGI supports a model enabling reinvestment which supports bankability for new builds and upgrades, reducing reliance on third-party providers.

## 2. Alignment of RSE administrative settings

The RSE scheme underpins over \$8 billion in horticulture and viticulture export revenue and provides vital income for Pacific communities. An individual RSE can return as much as \$20k to their home island per season. Current administrative settings are fragmented, inefficient, and costly. NZKGI advocates for a streamlined, resilient RSE framework that:

- Reduces administrative burden and costs.
- Improves worker experience and retention.
- Provides certainty for employers to invest in production and accommodation.
- Strengthens NZ's competitiveness against faster schemes like the Pacific Australia Labour Mobility scheme.

### Key Issues and Solutions

#### RSE employer status

Renewal cycle for an employers' status as a RSE employer (every 2-3 years) is slow and resource-heavy, taking up to 12 months. The process involves excessive paperwork adds no real compliance value. *NZKGI supports an extension of employers RSE status to six years after at least five years of continuous participation. NZKGI also supports a focus of Labour Inspectorate (LI) resources on real risk areas.*

#### Approval to Recruit (ATR)

ATRs expire every 7-9 months, forcing seasonal reapplications. Timing delays cause missed flights and increasing risks associated with recruitment breaches. *NZKGI supports the implementation of a three year ATR aligned with three year multi-*

*entry visas. In addition, NZKGI supports the introduction of a managed 'unused cap pool' for flexibility.*

#### Multi-entry visas

Annual renewals of multi-entry visas create high costs for workers (visa fees and medical checks) and processing delays. *NZKGI supports the introduction of three year multi-entry visas for returning workers. This will align multi-entry visas with other visa categories and deliver cost savings and efficiency.*

#### Accommodation audits

Annual audits consume LI resources and create unnecessary compliance burden. *NZKGI supports a transition to a three year audit cycle aligned with ATR renewals which retains annual self-audits by employers.*

#### Movement of workers

Current rules prohibit moving workers outside their region without full ATR and visa process. This is impractical for seasonal demand changes. *NZKGI supports the allowance of nationwide movement within the same employer under approved accommodation. Within this framework, employers must notify the LI within five working days for short-term moves (up to eight weeks).*

#### Online applications

Visa processing remains paper-based, causing delays and errors and digitisation is not expected until 2028. *NZKGI supports an acceleration of digitisation. As an interim measure, NZKGI supports the adoption of three year visas to reduce processing peaks and free resources for compliance.*



### 3. Accommodation standards review and clarifications

Employers face ambiguity and inconsistent application of INZ RSE accommodation standards alongside Building Code and regional authority rules. MBIE's review is considering reduced bedroom numbers and tighter bathroom ratios, but there is confusion on bunk beds, indoor recreation space, Wi-Fi provision, and grandfathering for existing sites.

NZKGI supports the following solutions which are expected to provide clarity and consistency for employers, improved compliance and worker wellbeing and investment certainty for recent builds and planned developments:

- Publish a consolidated, authoritative standard that cross-references the Building Act/Code, RTA 1986, and TA requirements, with clear definitions and examples.
- Adopt transitional/grandfathering provisions for existing compliant sites, and flexible pathways to meet underlying outcomes (e.g., bedroom size vs common areas; catered meals offsetting kitchen concurrency).
- Clarify occupancy definitions, bathroom/toilet ratios, and adult-appropriate bunk bed specifications; mandate Wi-Fi at no worker cost, recognising connectivity to Pacific households.
- Retain annual self-audit but shift LI physical audits to risk-based cadence (e.g., 3-year) tied to ATR cycles.

### 4. Transportation cost methodology

Transport to and from work is a statutory pastoral care requirement, yet cost methodologies vary, causing disputes over deductions, vehicle standards, licensing, and route planning. Further, paper-based processes exacerbate inefficiencies.

NZKGI supports the following solutions which are expected to provide transparent, fair deductions with stronger safety and efficiency as well as lower per-worker costs through route optimisation and shared services. This involves:

- Defining 'actual, reasonable, verifiable' transport cost components (vehicle lease/finance, insurance, fuel, maintenance, RUC/WOF/reg, driver wages, scheduling).
- Setting a national benchmark per-km or per-trip framework with regional adjustment bands; require annual evidence.
- Establishing minimum transport safety and driver competency standards aligned to INZ pastoral care obligations.
- Encouraging pooled transport across employers within regions; digital rostering to optimise routes.



# Education

## Case study

NZKGI advocates for a dual-pathway education model that values both vocational and academic routes into horticulture.

This includes robust support for secondary school programmes, tertiary reform, and industry-led training initiatives that prepare students for high-value roles across the supply chain.

Without targeted education pathways, the industry risks workforce shortages with a decline in skilled labour, particularly in technical, management, and innovation roles.

*NZKGI supports the reversal of the proposal to remove agribusiness and agricultural science as standalone subjects from the 2028 curriculum. Of particular concern was the proposed Science and Social Science Curriculum which did not provide food production 'knowledge rich' facts, concepts or contexts. The retention of agribusiness and agricultural science subjects represents a significant acknowledgement of the important role that food producing businesses and Agricultural and Horticultural Science plays in New Zealand society.*

### Agribusiness in schools

Agribusiness in Schools (AIS) focusses on applied science and commerce. Initially formed on the back of parents and industry expressing a keenness to see more career pathways in agriculture, AIS encourages students to adopt an innovative and solutions-based approach in their thinking.

Over the past five years, AIS has consistently engaged 90-110 schools annually. 9% of AIS students' progress into related tertiary study. Between 6% and 19% of students pursued tertiary training in agriculture within three years of leaving school. AIS students are 3.6 times more likely to be enrolled in related tertiary training than non-AIS students. 22% to 44% entered primary sector employment.

Diversity in AIS students is also growing in terms of gender, with female students making up 44% of the AIS cohort in 2023. Further, on average, 80% of AIS students were from low to medium decile schools between 2018-2020.

19,528 students have studied Agribusiness over the last eight years, and 154 teachers are members of the Agribusiness Teachers Association.





# Māori Land Court administration

Māori growers operating under Māori trusts or incorporations face significant competitive disadvantages due to administrative inefficiencies in the Māori Land Court. Changing governance members in the Court can take two or more years. The process requires the trust to file an application, wait for a case manager to be appointed, wait for a hearing date because registrars are not exercising their powers under the Act, and, finally, wait for the sealed order. This cycle can be ongoing, as governance member changes often occur annually.

During these delays, trusts/incorporations are unable to act.



Māori growers ability to exercise tino rangatiratanga over resources is restricted, preventing them from seizing opportunities or responding to unforeseen events.

*NZKGI supports reform of administration within the Māori Land Court to empower Māori growers. The current processes fail to meet the objectives of the Te Ture Whenua Māori Act 1993, which aims to promote and assist the effective use, management, and development of Māori land.*

Enabling Māori growers to seize opportunities through effective administration in the Māori Land Court.





# Access to agrichemicals

Agrichemicals play an essential role in horticulture, supporting plant health, growth, and overall productivity. They help growers manage pests and diseases effectively, ensuring crop quality and reliability in a challenging and variable growing environment. At the same time, it is well recognised that many agrichemicals carry environmental and human health risks. The kiwifruit industry is committed to reducing these risks and would strongly prefer to use lower impact products wherever possible. However, access to newer, safer agrichemicals in New Zealand remains too slow, limiting growers' ability to transition toward more sustainable crop protection options. Regulatory systems must enable easier access.



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*NZKGI endorses the Ministry for Regulation's review and recommendations made on agricultural and horticultural products. We also acknowledge the steps the Environmental Protection Authority and Ministry for Primary Industries have taken to implement recommendations, and we support them on the improvement journey.*







# Biosecurity

The New Zealand kiwifruit industry takes biosecurity extremely seriously, with management of risk led by Kiwifruit Vine Health (KVH).

We are the only primary industry in the country with a dedicated biosecurity body.

KVH was established in 2010 to lead the industry response to the vine disease Psa-V and became a Management Agency under the Biosecurity Act in 2013. Their mandate expanded in 2014 to include managing readiness and response activities for all exotic kiwifruit pests and diseases, and in the same year they became the first industry partner in the Government Industry Agreement (GIA) for Biosecurity Readiness and Response.

Recent biosecurity responses that KVH has been a partner of under GIA include the Yellow-legged hornet (due to potential impact on pollination services) and Queensland Fruit Fly. KVH has a long history of working collaboratively with the Ministry for Primary Industries and other primary industry organisations to achieve better biosecurity outcomes together.

Recently, KVH's role was further broadened by the industry to coordinate large-scale emergency responses through an Emergency Response Management framework, ensuring all growers are supported and the industry remains resilient.

## **KVH advocates for:**

### **Strong biosecurity partnership**

Continued collaboration and agreements under GIA for readiness and response.

### **Investment in surveillance and diagnostics**

Funding for early detection systems and rapid identification of exotic pests and diseases.

### **Emergency response capability**

Support for frameworks that enable fast, coordinated action during biosecurity incursions or large-scale emergencies that impact growers.

### **Pathway risk management**

Measures to reduce risk across industry pathways under our National Pest Management Plan and entry of pests through imports, shipping, and passenger pathways.

### **Research and innovation**

National research programmes that develop tools and strategies for pest and disease management, in partnership with industry organisations, GIA partners, the Bioeconomy Science Institute and international collaborators.

## **New Zealand Kiwifruit Growers Inc.**

Our vision is for New Zealand kiwifruit growers to be the most successful and future-ready producers in the world.

NZKGI represents kiwifruit growers, giving them their own voice in industry and government decision making. Our work to support growers falls under six portfolios - Industry Stability, Performance & Insights, Communications, Labour & Education, Environment & Policy and Organisational Management.

For more information about NZKGI, visit [www.nzkgi.org.nz](http://www.nzkgi.org.nz)



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