

To: Primary Production Select Committee

Date: 15 June 2026

Submission on: Agricultural Compounds and Veterinary Medicines (ACVM) and Hazardous Substances and New Organisms (HSNO) Amendment Bills

From: New Zealand Kiwifruit Growers Incorporated (NZKGI)

Supported by: Zespri Group Limited (Zespri)
Kiwifruit Vine Health (KVH)

New Zealand Kiwifruit Growers Incorporated

New Zealand Kiwifruit Growers Incorporated (NZKGI) advocates on behalf of around 2,800 kiwifruit growers by representing their commercial and political interests in industry and government decision making.

We are committed to upholding the industry's social licence by promoting responsible practices, ensuring compliance, and engaging with the community to address concerns proactively.

We are funded by levies mandated under the Commodity Levies Act 1990.

The kiwifruit industry at a glance

- 197 million trays, equal to about 700 million kilograms of New Zealand-grown kiwifruit were sold in 2024/25 season, totalling \$3.6 billion. More than 90% of that is exported.
 - There are about 3,200 kiwifruit orchards on 15,500 hectares of land across Northland, Auckland, Waikato, Bay of Plenty, Poverty Bay, Hawke's Bay, Whanganui, and Tasman districts.
 - Māori growers produce around 10% of kiwifruit.
 - The kiwifruit industry provides about 20,000 jobs to New Zealanders and migrants in peak harvest.
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Introduction

New Zealand Kiwifruit Growers Incorporated (NZKGI), welcome the opportunity to submit on the Agricultural Compounds and Veterinary Medicines (ACVM) and Hazardous Substances and New Organisms (HSNO) Amendment Bills.

We are broadly supportive of the policy intent of both Bills and recognise these reforms as part of a wider programme of work responding to the Minister for Regulation's Agricultural and Horticultural Products Regulatory Review.

Overall position

NZKGI:

- Support the direction of reform, particularly efforts to improve efficiency, reduce regulatory duplication, and streamline application processes
- Recognise that these Bills are one component of a broader reform package, including operational improvements already underway at the Environmental Protection Authority (EPA) and the Ministry for Primary Industries (MPI)
- Support a regulatory system that is risk-based, proportionate, and responsive to innovation
- Support outcomes that enable growers to reduce environmental harm through access to more targeted, lower-risk, and more sustainable crop protection tools.

At a high level, we consider the legislation provides a sound framework for improvement but emphasise that successful outcomes will depend on implementation in practice.

Acknowledgement of progress to date

We acknowledge the work undertaken by EPA and MPI to begin implementing improvements alongside legislative reform.

In particular, we note:

- Ongoing efforts to improve processing efficiency and reduce backlogs
- Actions to strengthen coordination between ACVM and HSNO processes
- Increased transparency through regular reporting on system performance, including quarterly updates on hazardous substances and ACVM system improvements
- Early steps toward risk-based approaches and process simplification

These actions demonstrate a commitment to improving system performance, including enabling the uptake of products that can reduce environmental impacts while maintaining productivity.

Importance to the kiwifruit industry

The kiwifruit industry depends on access to crop protection tools to:

- Manage pests and diseases, including emerging biosecurity threats
- Meet strict export market requirements (e.g. residue standards)
- Maintain productivity, fruit quality, and orchard sustainability
- Transition toward lower environmental impact production systems.

Access to newer tools is critical not only for productivity, but also for enabling growers to:

- Use more targeted and lower-risk chemistries
- Adopt biological and non-chemical solutions
- Reduce off-target effects and environmental harm.

As a small, export-focused sector, New Zealand growers rely heavily on the ability to access innovation developed in larger offshore markets.

Support for improved efficiency and reduced complexity

We support provisions across both Bills that aim to:

- Reduce duplication between ACVM and HSNO requirements
- Enable greater use of overseas regulatory assessments
- Support risk-based decision-making
- Improve clarity and predictability for applicants

These changes are essential for ensuring that growers can access modern, safer tools more quickly, which in turn supports both productivity and improved environmental outcomes.

Ongoing concern: Access to innovation

While supportive of the reforms, the kiwifruit industry remains concerned about New Zealand's ability to attract and adopt new products and innovation.

Growers continue to face:

- Delays in product approvals relative to other jurisdictions
- Limited availability of new and lower-risk chemistries
- Barriers to introducing biologicals and novel technologies
- A shrinking pipeline of products for minor and specialty crops.

We have heard from international organisations that New Zealand has become a lower priority market, further constraining access to products that support both productivity and sustainability.

Key consideration: Implementation will determine success

We consider that the Bills provide the right enabling framework, but their success will depend on:

- Achieving real reductions in approval timeframes
- Ensuring genuine alignment and coordination between ACVM and HSNO processes
- Applying international reliance provisions confidently and consistently
- Delivering practical benefits for applicants, including reduced duplication and clearer pathways
- Maintaining sufficient resourcing and capability within regulators.

Importantly, the system should enable faster access to products that support improved environmental performance and reduced environmental harm, alongside strong safety standards.

Role within the broader reform programme

We acknowledge that these Bills sit within a broader suite of reforms arising from the Ministry for Regulation review.

We support this wider programme and consider that:

- Legislative change must be complemented by operational, cultural, and system-level improvements
- Continued engagement with industry will be important to test whether reforms are working in practice
- Ongoing monitoring and reporting (such as current quarterly updates) should be maintained.

Conclusion

NZKGI support the intent of the ACVM and HSNO Amendment Bills to create a more efficient, streamlined, and proportionate regulatory system.

We acknowledge the progress already being made by EPA and MPI and the role these reforms play within the wider regulatory improvement programme.

We encourage continued focus on implementation to ensure the reforms deliver tangible improvements for growers, particularly in access to modern, lower-impact crop protection tools.

We welcome ongoing engagement as the reforms progress.



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