



PO Box 10232, The Terrace,
Wellington, 6140

Level 4, Kiwi Wealth House

20 Ballance Street, Wellington, 6011

Phone: +64 4 472 3795

Web: www.hortnz.co.nz

Email: info@hortnz.co.nz

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Submission the horizon scan to support the strategic direction of the binational food regulatory system for 2023-2026

Submitter: Horticulture New Zealand Incorporated

Submitted by: Anna Rathé, Strategy and Risk Policy Team Lead

Contact Details: P O Box 10232, The Terrace, Wellington 6140, New Zealand
Ph: +64 4 494 9980
Email: anna.rathe@hortnz.co.nz

INTRODUCTION

1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 6,000 commercial fruit and vegetable growers. The horticulture industry is valued at \$6.73b with \$4.55b in exports annually.
2. The industry employs over 60,000 people, occupies some 80,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas.
4. As HortNZ is an industry good organisation working in the interests of its members (commercial fruit and vegetable growers), we provide general comments and responses to some Australia New Zealand food regulation consultations, where relevant to the horticulture industry.

5. The food regulatory system is critical for the success of the New Zealand horticulture sector. HortNZ is supportive of efforts to ensure that the binational food regulatory system remains strong, robust, and agile into the future.

CONSULTATION QUESTIONS

6. HortNZ welcomes the opportunity to submit on the horizon scan and has the following comments on the three consultation questions

Question 1: Are the trends, issues, risks, and opportunities affecting the broader food system accurately captured in the Horizon Scan? If you answered no, which matters have not been captured?

- Risk - the increasing price of food, and in particular fresh produce, due to rising production, shipping and compliance costs.
- Risk - biosecurity threats are increasing and will likely grow with trade, travel, e-commerce and climate change.
- Risk – novel and advanced breeding techniques such as gene editing are emerging around the world, but there is often no way to test for or differentiate between an end product (a piece of fruit or a vegetable) that has been produced using advanced breeding techniques and imported versus the conventional breeding used onshore.
- Opportunity – evidence based nutritional claims for fresh produce. The next stage of the ‘superfood’ trend.
- Trend - the food safety system is heavily regulated already
- Trend – retailers insisting that their suppliers meet often values-based requirements that are much more stringent than the regulatory requirements.
- HortNZ would like to note that the primary focus of the horizon scan appears to be risks. Is more emphasis on opportunities needed?

Question 2: To what extent are there activities underway within your organisation, to manage these issues and risks and to leverage these opportunities?

- HortNZ, as an industry body, advocates on all manner of risks, opportunities and proposals that are relevant to the food system, spanning climate change, sustainability, biosecurity, food safety and more.
- Private standards and assurance programmes for horticulture already exist that are recognised nationally and internationally, for example Good Agricultural Practice.
- HortNZ is involved with the New Zealand Food Safety Science & Research Centre emerging risk identification system, a collaboration between government and industry to monitor and manage emerging food safety risks
- HortNZ is a key stakeholder in a range of research projects which promote and improve safe and sustainable production.

Question 3: What opportunities do you consider exist for future work or partnerships, for mutual benefit?

- We believe achieving a strong food system while minimising the regulatory burden is best achieved by industry and regulators working in partnership and

making use of (or integrating with) existing food assurance schemes, wherever possible.

CONCLUSION

7. HortNZ welcomes the opportunity to discuss the points raised in this submission.

REFERENCES

The Australia New Zealand Food Regulatory System: A world-class collaborative food regulatory system focused on improving and protecting public health and safety (2022). Horizon Scan to support the System Strategic Direction for 2023-2026 Consultation Paper.