



23 May 2020

S20.09

## Submission to Primary Production Select Committee on the Organic Products Bill 221-1

### Introduction

- 0.1. The National Council of Women of New Zealand, Te Kaunihera Wahine o Aotearoa (NCWNZ) is an umbrella group representing over 200 organisations affiliated at either national level or to one of our 15 branches. In addition, about 450 people are individual members. Collectively our reach is over 450,000 with many of our membership organisations representing all genders. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
- 0.2. This submission has been prepared by the NCWNZ Consumer Affairs Standing Committee and the Parliamentary Watch Committee after consultation with the membership of NCWNZ.

### 1. Executive summary

- 1.1. NCWNZ has had a long-standing interest in consumer protection, the right of consumers to know what is in the food they eat and the promotion of safe, healthy food. We therefore support the Organics Product Bill and its goals to increase consumer confidence and trust when purchasing organic products; to ensure greater certainty around organic claims; and ensure there are mandatory standards for any food that is sold, labelled or represented as organic. Consumers have had concerns about some of the confusing and questionable claims around organic food, and we therefore welcome the intention to introduce a National Standard for organic products. We are aware that demand for organic food has been increasing significantly in recent years and hope that the introduction of a national standard will encourage further investment in organic food production and boost the export market for organic food

## 2. Specific clauses

- 2.1. **Part 6; clauses 105 and 106; Organics standards.** We support Subpart 1 which specifies the power to make regulations prescribing an organic standard in relation to any product or class of products, and clause 106 (b) and (d) which stipulate that the sector should be consulted and involved in assisting in the standards' development. We note that the regulations that businesses must follow for approval to market products as organic, as detailed in clause 105, can be quite prescriptive and relate to packing, storing, production, processing of organic food. While we support the general intention of this clause, we hope that the national standards will not be so prescriptive and onerous as to deter producers, particularly small-scale organic producers, from producing and marketing organic food. We do not wish to see, as an unintended consequence of the regulations, that organic production becomes more expensive and that small-scale producers are deterred. Therefore, we would like to understand the cost for small NZ based growers compared to large national and international operators. We would support a tiered system, so that small-scale organic growers are not expected to face the same compliance costs as large and international operators.
- 2.2. **Clause 108 Exemptions for class of persons.** We note that the legislation permits exemptions to be made from the requirement that all producers and operators will need to be approved to operate as an organic producers/retailers. We support this exemption, provided that it will not result in consumers being misled about organic foods.
- 2.3. **Clause 107: General regulation-making power.** We support the proposal to prescribe a national mark for organic foods; the class of operators who may use the mark and any restrictions on its use. We believe a national organic mark or symbol would be very helpful in enabling consumers to see at a glance that food is organic. We also support the use of a public register and the stipulation for the prescribing of records that an operator must provide.
- 2.4. **Schedule 2; Search and Surveillance Act 2012 Clause 107: General regulation-making power.** While we understand the need to monitor the application of any National Organic standard, and the need, in exceptional circumstances, for power to enter properties to carry out surveillance and monitoring, we do not wish to see heavy-handed search and surveillance operations used routinely, as we believe the New Zealand food industry should operate on the basis of trust rather than surveillance.

## 3. Conclusion

- 3.1. We support the introduction of a National Standard for organic food, so that consumers can have confidence around the purchase of organic food and there is greater certainty around organic claims.



Suzanne Manning  
NCWNZ Board

Sue Kedgley  
Convenor NCWNZ Consumer Affairs Standing Committee