

Submission on the Agricultural Compounds and Veterinary Medicines Amendment Bill

15 June 2026

To: Primary Production Select Committee

Name of Submitter: New Zealand Vegetable Council

About the New Zealand Vegetable Council

The New Zealand Vegetable Council (NZVeg) is a pan-vegetable sector organisation established to provide a unified voice for New Zealand vegetable growers. NZVeg represents growers, packhouses and exporters producing and selling vegetables. Our members grow vegetables using a wide range of outdoor and greenhouse production systems.

The New Zealand vegetable sector produces approximately 1.2 million tonnes of vegetables annually, generates approximately \$1.1 billion in farmgate returns, employs around 9,600 people, and contributes significantly to domestic food security. The sector includes approximately 980 mostly family-owned growing businesses operating across 40,000 hectares of outdoor production and 320 hectares of greenhouse production.

Vegetable growers operate in one of New Zealand's most intensive production environments. Access to effective crop protection tools is essential to maintaining crop yields, product quality, food security, and grower profitability.

Executive Summary

The New Zealand Vegetable Council wishes to be heard by the select committee on our submission.

The New Zealand Vegetable Council supports the Horticulture New Zealand submission in its entirety and does not seek to repeat the matters raised in that submission. Instead, this submission focuses on several issues of particular importance to commercial vegetable growers and proposes additional refinements that NZVeg believes would strengthen the Bill and improve its practical operation.

This Bill and the accompanying HSNO Bill are of utmost importance to the New Zealand vegetable sector. Due to the nature of the industry having many small niche crops, the industry is not attractive for multi-national companies to invest resources in to register new products in New Zealand. For example, we have five globe artichoke growers, for a multinational to invest hundreds of thousands of dollars, for a very small market, simply doesn't make sense. There needs to be a pathway forward where we can continue to produce vegetables affordably in New Zealand.

NZVeg supports the overall direction of the Bill and welcomes the Government's commitment to improving New Zealand's regulatory system for agricultural compounds and veterinary medicines.

Importantly, NZVeg wishes to acknowledge the significant work already undertaken by the Ministry for Primary Industries and the ACVM team in recent years. Growers, industry organisations, and registrants have observed a positive shift in engagement, responsiveness, and willingness to work collaboratively on practical solutions to long-standing challenges. While further improvements are required, NZVeg considers that the proposed reforms build on a number of positive changes that are already occurring within the ACVM system.

The vegetable sector is particularly supportive of:

- Greater reliance on recognised overseas regulator assessments.
- Improved pathways for biological and lower-risk products.
- Increased flexibility within the regulatory framework.
- Better alignment between ACVM and HSNO processes.
- Improved transparency and performance reporting.
- Recognising Codex MRLs, for minor crops with no specific NZ MRL.

However, NZVeg considers that further refinements are required to address:

- Minor crop registration challenges.
- Resistance management.
- Food security considerations.
- Biosecurity preparedness.
- Biological product approvals.
- Whole-of-system regulatory coordination.

The success of the reforms should ultimately be measured by whether growers gain access to safe, effective and innovative crop protection tools more quickly while maintaining New Zealand's high standards for food safety, human health, environmental protection and market access.

Given the importance of these two bills before select committee for the vegetable sector, we also implore Government to not wait two years to complete the regulations for these Bills to

become active. Our preference is once these Bills are refined and approved, that the regulations are developed promptly so we can make the most of these important Bills.

Positive Changes Already Underway

Before addressing the specific provisions of the Bill, NZVeg wishes to recognise the improvements that are already occurring within the ACVM system.

Members have reported improved engagement with ACVM officials, greater willingness to discuss practical pathways forward, and increased recognition of the challenges faced by sectors such as vegetables where registration economics can be difficult.

NZVeg acknowledges that many of the improvements sought by industry will not necessarily be visible through legislative amendments alone. Cultural change, improved regulatory practice, better communication and greater use of existing legislative flexibility are all important components of a successful reform programme.

NZVeg encourages the Committee to ensure that the positive momentum already established within MPI continues following enactment of the Bill.

International Regulatory Assessments

NZVeg strongly supports the increased use of recognised overseas regulator assessments and supports the recommendations made by Horticulture New Zealand in this area.

For vegetable growers, international regulatory reliance is one of the most important opportunities to improve access to crop protection products.

New Zealand is a small market by international standards. In many cases, products have already undergone extensive assessment by regulators such as the Australian Pesticides and Veterinary Medicines Authority (APVMA), Health Canada's Pest Management Regulatory Agency (PMRA), the United States Environmental Protection Agency (EPA), or equivalent European authorities.

NZVeg considers that duplication of these assessments often creates unnecessary cost and delay without materially improving outcomes.

Where a product has already been assessed and approved by a recognised overseas regulator, the default position should be reliance on that assessment unless there are clear New Zealand-specific reasons that justify further review.

This issue is particularly important for vegetables because many products are approved overseas years before becoming available in New Zealand.

As an example, Movento (spirotetramat) provides a useful example of the challenges faced by New Zealand vegetable growers. The product has been registered and used internationally for more than 15 years and is approved across a wide range of vegetable crops in major horticultural jurisdictions. In the United Kingdom alone, Movento is registered for brassicas, lettuce, potatoes, onions, carrots, parsnips, swedes, turnips and shallots. Australian registrations similarly extend across numerous vegetable crops. Despite extensive international assessment and long-term use overseas, New Zealand vegetable growers have not had access to the same breadth of crop registrations. This illustrates the need for greater reliance on recognised international assessments and more practical pathways for minor crops. It should be noted that, we can use it off label in New Zealand still, but our preference is for efficient label extensions due to customer requirements.

Recommended Amendment

NZVeg supports HortNZ's recommendation that recognised overseas assessments should be relied upon as the primary basis for decision-making unless there are reasonable New Zealand-specific grounds to undertake additional assessment.

Minor Crops and Registration Economics

The vegetable sector is uniquely affected by the economics of product registration. Unlike many agricultural sectors that rely on a small number of major crops, the vegetable industry consists of dozens of individual crops, many of which occupy relatively small areas and represent limited commercial markets.

The economics of registration frequently do not stack up. A registrant may be required to invest hundreds of thousands of dollars to support registration of a product for a crop that only occupies a small area nationally. As a result, products that are available overseas often never become registered in New Zealand.

This leaves growers with fewer options than their international competitors and increases vulnerability to resistance development, pest outbreaks and production losses.

NZVeg considers that the current reforms represent an opportunity to better recognise the realities of minor crop production.

NZVeg encourages the Committee to ensure the legislation supports:

- Crop grouping approaches.
- Extrapolation of overseas efficacy data.
- Recognition of overseas residue data.
- Proportionate information requirements.

- Flexible approaches for minor use registrations.

Biopesticides and Biological Products

NZVeg strongly supports the creation of dedicated pathways for biopesticides, biological and modern novel products.

Vegetable growers are increasingly adopting integrated pest management systems that combine conventional chemistry with biological controls, microbial products, pheromones, beneficial insects and other lower-risk technologies.

These products often:

- Improve environmental outcomes.
- Reduce residues.
- Support resistance management.
- Align with customer expectations.
- Reduce reliance on conventional chemistry.

Despite these benefits, many biological products continue to face approval pathways largely designed around conventional chemistry.

This can create costs, delays and uncertainty that are disproportionate to the risks presented by many biological technologies.

The Council believes New Zealand has an opportunity to become a leader in the adoption of biological crop protection technologies if appropriate regulatory settings are established.

Recommended Amendment

Create a dedicated pathway for biopesticides, biological products and other novel lower-risk crop protection technologies.:

- Proportionate information requirements.
- Reduced regulatory burden where appropriate.
- Greater reliance on international assessments.
- Shorter assessment timeframes.

Resistance Management

Resistance management is one of the most significant challenges facing commercial vegetable growers. The long-term sustainability of vegetable production depends on maintaining access to multiple modes of action and ensuring growers can rotate products effectively.

Where access to new products is delayed, growers are forced to rely on a smaller range of available tools. This increases selection pressure and accelerates the development of resistance.

Once resistance develops, the consequences can be severe. Entire chemistry groups may become ineffective, resulting in increased production costs, reduced crop yields and greater environmental pressure.

Resistance management is not simply a grower issue. It affects:

- Food production capability.
- Food affordability.
- Environmental outcomes.
- Long-term sustainability.
- Grower confidence to invest.

NZVeg is concerned that resistance management is not explicitly recognised within the Bill as a factor that decision-makers should consider.

NZVeg considers that maintaining access to diverse modes of action delivers a public benefit and should be recognised as such.

As an example, onions have faced resistance issues for *Stemphylium* leaf blight. It has at times destroyed 40% of the crop, although there have been other contributing factors to this as well. Research conducted by Onions New Zealand found that *Stemphylium* leaf blight had in fact developed resistance to some of the chemistry being used. Although we have improved husbandry practices now and crop health, having a range of products is critically important to the longevity of the sector. If we lose 30-40% of the crop season to season, it is extremely difficult to be profitable.

Recommended Amendment

Require decision-makers to consider:

- Resistance management outcomes.
- Mode-of-action diversity.
- Integrated pest management objectives.
- Long-term sustainability benefits.

Food Security and Domestic Supply

NZVeg considers that food security is an important but often overlooked consideration within regulatory reform discussions. Unlike many agricultural sectors, a significant proportion of vegetable production is consumed domestically.

Access to crop protection products directly influences:

- Yield.
- Quality.
- Reliability of supply.
- Cost of production.
- Consumer prices.

When growers lose access to effective tools, the consequences are ultimately borne by New Zealand consumers.

NZVeg believes that maintaining domestic food production capability should be recognised as a relevant public benefit when considering regulatory settings.

Recommended Amendment

Require decision-makers to have regard to impacts on domestic food production and food security when making significant regulatory decisions.

Biosecurity Preparedness and Response Capability

NZVeg supports the recommendations made by Horticulture New Zealand regarding biosecurity preparedness. The vegetable sector is highly exposed to biosecurity threats and depends on rapid access to effective response tools.

Future responses to pests such as Brown Marmorated Stink Bug, Fall Armyworm and other emerging threats may depend on products that have limited commercial markets within New Zealand.

NZVeg is concerned that reassessment decisions, registration economics or lengthy approval processes could undermine New Zealand's ability to respond effectively. The ability to access treatment tools quickly is often critical to successful containment or eradication.

NZVeg believes biosecurity preparedness should be considered explicitly within the ACVM framework.

As an example, bifenthrin is being reviewed currently in New Zealand. If it is recommended by the Ministry for Primary Industries for use on Brown Marmorated Stink Bug if there was an incursion. So bifenthrin could be unavailable in NZ when there is an incursion of Brown Marmorated Stink Bug which would be really unfortunate.

We need to also consider the rapid need to use products and still be able to sell produce. For example, with fall army worm arrival into New Zealand, we need to be able to react quickly in commercial crops to manage fall army worm and need quick label extensions to allow the use of products for new pests.

Recommended Amendment

Establish specific pathways for products identified within approved biosecurity response plans and require consideration of biosecurity preparedness and response outcomes during decision-making.

Whole-of-System Coordination

Growers experience the regulatory system as a single approval pipeline rather than a collection of separate agencies. Delays within ACVM, EPA, DOC, WorkSafe and Regional Council processes all affect growers' ability to access products.

NZVeg supports greater alignment between ACVM and HSNO processes and strongly supports HortNZ's recommendation for an enduring oversight mechanism.

Recommended Amendment

Establish a formal cross-agency oversight mechanism with responsibility for monitoring performance across the regulatory system.

Transparency, Performance and Accountability

NZVeg supports improved transparency and performance reporting.

NZVeg acknowledges the positive changes already underway within MPI and believes transparent reporting will help demonstrate whether the reforms are achieving their objectives.

The sector would benefit from regular reporting on:

- Approval timeframes.
- Application backlogs.
- Use of international assessments.
- Biopesticide approvals.
- Minor use registrations.

Such reporting would provide confidence that the reforms are delivering practical improvements for growers.

Recommended Amendment

NZVeg supports the performance reporting already being undertaken by MPI and recommends that reporting be expanded to include metrics that better demonstrate whether the reforms are improving access to products. This should include reporting on approval timeframes by

application type, biological product approvals, minor-use registrations, use of international assessments, and combined ACVM–EPA approval performance.

Summary of Recommendations

NZVeg recommends that the Committee:

1. Support greater reliance on recognised overseas regulatory assessments.
2. Establish dedicated pathways for minor crops and minor use registrations.
3. Create dedicated pathways for biopesticides and biological products and other novel controls.
4. Recognise resistance management as a relevant decision-making consideration.
5. Recognise food security and domestic food production as relevant public benefits.
6. Strengthen biosecurity preparedness provisions.
7. Improve whole-of-system coordination across agencies.
8. Support the continued enhancement of reporting.

Conclusion

NZVeg supports the direction of the Bill and the recommendations advanced by Horticulture New Zealand.

NZVeg is encouraged by both the reforms proposed in the Bill and the positive changes already occurring within MPI's ACVM team. The sector believes the reforms are moving in the right direction and provide an important opportunity to improve access to crop protection tools for New Zealand growers.

However, further refinements are required to ensure the benefits are fully realised for vegetable growers, particularly in relation to minor crops, biological products, resistance management, food security and biosecurity preparedness.

NZVeg welcomes the opportunity to appear before the Committee in support of this submission.