



Committee Secretariat
Primary Production Committee
Parliament Buildings
Wellington

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Submission: Agricultural Compounds and Veterinary Medicines Amendment Bill

Submitter: Organics Aotearoa New Zealand (OANZ)

Contact person: Scott Lawson, OANZ Board Member | Director of True Earth

Phone: 0274446267

Email: scott@trueearth.co.nz

We wish to appear before the committee to speak to our submission.

About OANZ

1. Organics Aotearoa New Zealand (OANZ), the national sector body representing and coordinating the organic sector, appreciates the opportunity to submit on the Agricultural Compounds and Veterinary Medicines Amendment Bill.
2. OANZ represents 90% of Aotearoa New Zealand's \$1.18 billion organic sector and, since its formation in 1998, has been actively involved in policy development on issues affecting the organic sector and beyond.

Executive summary

3. OANZ opposes the Agricultural Compounds and Veterinary Medicines Amendment Bill (ACVM).
4. If the Bill is not abandoned, the consultation process must be extended by at least six months to allow sufficient time for full and genuine public consultation, given its complexity and far-reaching ramifications.
5. OANZ is of the view that the proposed changes in the Agricultural Compounds and Veterinary Medicines Amendment Bill have the potential to undermine Aotearoa's GE-free status with significant consequences for the environment, human and animal health (e.g. Bovaer) and our global brand.

6. OANZ is disappointed with the limited and ineffective consultation approach and the lack of transparency related to the interaction of the Bills. The failure to effectively consult means risks to the organic sector and the primary sector more broadly have not been sufficiently understood and lack a strategy for mitigation.
7. The failure to promote evidence-based policy, to consult effectively and to adequately consider the implications for the organics sector creates intolerable risk. The Select Committee is encouraged to recommend against the proposed Bill being passed and avoid potential economic sabotage.
8. The Ministry for Primary Industries (MPI) describes the changes proposed within the Agricultural Compounds and Veterinary Medicines Amendment Bill as seeking (among other things) to 'review the timeframes required by law for ACVM approval decisions and includes proposals to enable international regulators to be recognised'.¹ Given the evident overlap, many of the concerns we have raised in respect of the Hazardous Substances and New Organisms Amendment Bill are replicated for this process.
9. This submission outlines our key concerns in brief. OANZ would welcome the opportunity to contribute to a properly paced and sufficiently robust conversation about these critical matters. In contrast to what occurred with the Gene Technology Bill, OANZ was given no opportunity to engage prior to the public consultation process.
10. OANZ is concerned that aspects of both the Agricultural Compounds and Veterinary Medicines Amendment Bill changes and the contemporaneous changes proposed within the Hazardous Substances and New Organisms Amendment Bill create unacceptable risk of harm to the environment, human health and to our global brand. We are concerned that a full and proper assessment of risk to the public interest has not occurred. This constitutes a lack of care and a lack of foresight.
11. OANZ supports our members having access to safe, useful and innovative products. Legislation and regulations consistent with these objectives must be transparent, reliable, and sufficiently nuanced to achieve proportionality of regulatory burden based on scientific and socioeconomic determinations, not ideological ones.
12. OANZ supported some aspects of the Ministry for Regulation review and generally supports the intent of modernising statutes, where these are beneficial.² However we are of the view that the

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<https://www.mpi.govt.nz/agriculture/agricultural-compounds-vet-medicines/acvm-improvements-to-agricultural-and-horticultural-product-approvals>

² Ministry for Regulation (2025) Agricultural and Horticultural Products Regulatory Review. NZ Government

proposed changes lack social licence and extend far beyond modernisation and into territory Aotearoa New Zealand has previously avoided for good reason. Any perceived benefits arising from the proposed changes proceeding into law would be cancelled out by the concerns we have raised.

13. The ACVM Amendment Bill, the HSNO Amendment Bill, and the Gene Technology Bill are being advanced simultaneously. Considered separately, each may appear modest. Together, they represent a fundamental shift in New Zealand's approach to GE regulation.
14. OANZ is especially concerned that the ACVM Bill creates a context where the consideration of the potential introduction of gene technology may be enabled without the oversight and restrictions found in HSNO. This risk arises because of the unclear interplay between the legislation (see table below where we highlight this). The present definition of 'biological compound' under the ACVM Act is not sufficiently restrictive to prevent the unintended release of genetically modified organisms.
15. Biological compounds can have a variety of characteristics. Some biological compounds have medicinal and pesticidal properties but do not involve any genetic modification techniques. The lack of nuance in the definitions creates risk if the definition of 'biological compound' in the ACVM is to be relied upon. In the event that this is the intention, the definition/s will need to carefully distinguish between these very different contexts. However, due to the opacity of the information available to submitters, it is difficult to tell.
16. Other key concerns are set out in the following table.

Key concern	Explanation	Relief sought
Narrow targeted consultation	Narrow targeted consultation that has resulted in a failure to adequately assess risks and impacts. OANZ did not have any opportunity to engage prior to the public consultation process, in contrast to the Gene Technology Bill. The ramifications for our sector have been overlooked.	That the Bill does not proceed due to the poor quality of consultation undermining the ability of the legislative process to appropriately weigh risks and benefits.

<https://www.regulation.govt.nz/assets/Publication-Documents/Agricultural-Horticultural-Products-Regulatory-Review-full-report.pdf>,

Opaque interactions between this and related bills	The opaque interaction of this and related bills, creating the opportunity for unforeseen consequences of proceeding with any one of the bills. The interaction of this Bill with the proposed changes within the Hazardous Substances and New Organisms Amendment Bill and the currently stalled Gene Technology Bill is complex and unclear to legislators, officials and industry.	Presently, the industry and other stakeholders have not been given adequate guidance to assess implications. In the absence of this synthesis, the Bill should not proceed due to uncertainty.
A lack of full and proper regulatory impact assessments across economic, trade, social, environmental and cultural spectrums.	Policy proposals rely heavily on the Ministry for Regulation's Review. A robust Regulatory Impact Statement that takes full accounts of the impacts of the proposals has not been completed as it was 'not required'.	That the Bill does not proceed due to the weak assessments of regulatory impact.
Amendments made in anticipation of alignment with the Gene Technology Bill	Some changes outlined are posited in anticipation of the Gene Technology Bill becoming law. We contend that given the extreme controversy surrounding that legislative proposal and the fact that it will be unlikely to be passed prior to the next election, it is inappropriate to align this proposal to that Bill.	Remove provisions designed to support interplay with the Gene Technology Bill.