

New Zealand Government Policies Referencing Organic Agriculture: A Policy Landscape and Update Analysis

Following the Organic Products and Production Act 2023

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Executive Summary

The Organic Products and Production Act 2023 (OPPA) — which came into force on 5 April 2023 — represents the most significant structural change to New Zealand's organic sector in its history. For the first time, the use of the term 'organic' on products will be regulated by statute, with mandatory compliance requirements, a National Organic Standard, and a government-administered approval system for organic businesses.¹

This paper identifies and analyses all significant New Zealand government policies that either explicitly reference organic agriculture or are materially affected by the new regulatory framework. It covers seven agencies and policy domains: the Ministry for Primary Industries (MPI), the Environmental Protection Authority (EPA), the Ministry for the Environment (MfE), the Ministry of Foreign Affairs and Trade (MFAT), the Ministry of Health, the Ministry of Education, and Statistics New Zealand.

The central finding is that the OPPA 2023 does not operate in isolation. It sits within a dense existing policy ecosystem across multiple agencies — many of which reference organic agriculture under pre-regulatory assumptions that no longer apply. This creates both an update obligation and a strategic opportunity: the new framework creates alignment possibilities across freshwater, emissions, trade, health, and education policy that could significantly strengthen the case for organic agriculture at a whole-of-government level.

The paper rates each agency's policy on an update urgency scale: Immediate (direct conflict with OPPA), Near-Term (significant misalignment), and Ongoing (alignment opportunity to be pursued).

¹Organic Products and Production Act 2023 (NZ). In force 5 April 2023.

1. Introduction: The Policy Significance of OPPA 2023

Prior to the OPPA 2023, New Zealand was unusual among developed agricultural exporters in having no statutory definition of 'organic'. Products could be labelled organic subject only to the Fair Trading Act 1986's general prohibition on misleading claims. Certification was entirely voluntary, administered by private bodies such as BioGro New Zealand and AsureQuality. This meant that organic claims by uncertified operators were difficult to prosecute and that New Zealand lacked a statutory domestic standard — a prerequisite for formalising and future-proofing the organic equivalence arrangements that support preferential access for organic exports to key markets.²

The OPPA changes this fundamentally. Under the new system: any business making an organic claim for primary sector products must be approved by MPI; a National Organic Standard (NOS) will set mandatory production and processing rules; Recognised Entities (private certifiers operating under government oversight) will conduct pre-approval checks and ongoing verification; and MPI will administer the overall system including cost recovery, infringement notices, and appeals.

The NOS is currently in development, with mandatory compliance intended by 2028 following a three-year transition period. Cost recovery regulations under the Act were consulted on in mid-2025, with submissions closing in August 2025.³

This paper does not evaluate the OPPA itself. It examines the wider policy landscape that the OPPA now sits within, identifying where other government policies reference or affect organic agriculture and assessing what updates are required for coherence, accuracy, and strategic alignment.

²MPI (2023). Changes to Organic Products Law. mpi.govt.nz.

³MPI (2025). Cost Recovery Proposals under the Organic Products and Production Act 2023. Consultation closed 10 August 2025.

2. Ministry for Primary Industries (MPI)

2.1 Overview

MPI is the primary agency administering the OPPA 2023 and holds the most extensive policy footprint in relation to organic agriculture. Multiple MPI policies require direct update or review as a consequence of the new legislation.

2.1a NZFSA Policy on Organic Food: Background Paper

Status	IMMEDIATE UPDATE REQUIRED
Instrument	MPI Policy Statement (legacy NZFSA document)
Organic Reference	Direct — establishes government position on organic food regulation
Issue	Pre-dates OPPA 2023 by 15+ years; reflects voluntary-only framework

The New Zealand Food Safety Authority's Policy on Organic Food Background Paper remains publicly accessible on MPI's website as the foundational government policy statement on organic food. The policy was written when there was no organic-specific legislation and states explicitly that organic certification standards are not food safety standards and that organic food is treated the same as all other food by MPI. While the food safety principle remains valid, the entire framing of this document — which assumes a voluntary-only certification environment — is now outdated.⁴

The document must be replaced or substantially revised to: acknowledge the OPPA 2023 framework and mandatory NOS; clarify the relationship between food safety regulation and organic regulatory approval; and update MPI's stated policy position to reflect its new role as the organic approval authority, not merely as food safety regulator.

2.1b Official Organic Assurance Programme (OOAP)

Status	NEAR-TERM UPDATE REQUIRED
Instrument	MPI Export Certification Programme
Organic Reference	Direct — governs organic export certification
Issue	Parallel system to OPPA must be integrated, not duplicated

The OOAP is MPI's existing programme for certifying organic exports, providing official government assurances to trading partners. It operates under international Codex Alimentarius standards and bilateral recognition arrangements. As the NOS is finalised and the OPPA system becomes mandatory, the relationship between the OOAP and the

⁴MPI. NZFSA Policy on Organic Food: A Background Paper. mpi.govt.nz/law-and-policy/requirements/food-standards/food-policy.

domestic OPPA approval system must be clarified and formally integrated — both for regulatory coherence and to avoid dual compliance burdens on exporters.⁵

In particular, the OOAP's reliance on Recognised Certification Organisations will need to be mapped to the OPPA's Recognised Entity framework, and any gaps in market access coverage addressed in advance of mandatory NOS commencement in 2028.

2.1c Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997 – Inputs List

Status	NEAR-TERM UPDATE REQUIRED
Instrument	Statutory registration scheme (MPI-administered)
Organic Reference	Indirect — ACVM registration is prerequisite for inputs permitted under NOS
Issue	No explicit linkage between ACVM approvals and NOS-permitted inputs

The ACVM Act 1997 governs registration of all agricultural chemicals and veterinary medicines used in New Zealand. Under the organic system, the NOS will specify which inputs are permitted or prohibited. However, ACVM registration is a separate process that does not currently acknowledge organic compliance status. The policy gap is that an input could be ACVM-registered (commercially legal) but prohibited under the NOS, creating confusion for operators transitioning to organic.⁶

MPI will need to develop a cross-referencing mechanism — or at minimum a clear guidance document — linking ACVM registration categories to NOS-permitted inputs lists. This is an operational policy update with significant practical importance for transitioning operators.

2.1d MPI Strategic Intentions 2024-2028 and Action Plan 2025-2026

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	MPI Strategic Framework
Organic Reference	Implicit — high-value export focus aligns with organic sector
Issue	No explicit organic strategy within the export doubling target

MPI's current strategic framework articulates a goal of doubling the value of New Zealand's food and fibre exports by 2034. The organic sector — currently valued at NZ\$1.1 billion and growing — is a natural contributor to this target given the consistent price premiums organic products command in export markets. However, neither the Strategic Intentions 2024-2028 nor the Action Plan 2025-2026 explicitly reference the OPPA 2023 as an enabling tool for export value growth, nor identify organic agriculture as a priority pathway.⁷

⁵MPI. Official Organic Assurance Programme (OOAP). mpi.govt.nz/agriculture/organic-product-requirements-in-nz.

⁶MPI. Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997 – Registration of agricultural chemicals. mpi.govt.nz.

⁷MPI. MPI Action Plan 2025-2026 and Strategic Intentions 2024-2028. mpi.govt.nz/about-mpi/strategy.

The strategic opportunity is to explicitly position the OPPA 2023 implementation — particularly NOS finalisation and equivalence negotiations with the EU and UK — as a mechanism for achieving the export growth target. This would give the organic sector a formal place in MPI's strategic plan, directing resources and ministerial attention accordingly.

3. Environmental Protection Authority (EPA)

3.1 Overview

The EPA's primary organic-relevant function is the regulation of hazardous substances — including pesticides — under the Hazardous Substances and New Organisms (HSNO) Act 1996. The EPA does not currently regulate organic products or make organic-related claims, but its decisions on substance approvals directly affect what inputs are available for organic operators.

3.1a HSNO Act Approvals and Organic Input Lists

Status	NEAR-TERM ALIGNMENT REQUIRED
Instrument	HSNO Act 1996 – Substance Approvals
Organic Reference	Indirect — defines the universe of approved substances from which NOS permitted inputs are drawn
Issue	No formal coordination mechanism between EPA approvals and NOS development

The EPA approves hazardous substances — including pesticides, fertilisers classified as hazardous, and veterinary medicines — under the HSNO Act. The NOS, once finalised, will establish which approved substances may also be used in certified organic production. Currently there is no formal policy mechanism linking the two systems: the EPA approves a substance on risk-benefit grounds without reference to its organic compatibility, and the NOS will specify permitted inputs without a formal EPA coordination role.⁸

A formal interagency protocol between the EPA and MPI should be developed that: flags newly approved substances for NOS compatibility assessment; provides organic operators with clear guidance on which HSNO-approved substances are NOS-permitted; and ensures that any future HSNO reassessments of substances currently permitted under organic standards trigger a NOS review process.

3.1b Biopesticide and Biological Input Regulatory Pathway

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	HSNO Act – New Organism Approvals
Organic Reference	Indirect — biological controls central to organic pest management
Issue	New organism approval process creates barriers for organic-compatible biocontrols

Organic production systems rely heavily on biological pest controls — beneficial insects, microbial agents, and plant-based substances — many of which may require approval under the HSNO Act as 'new organisms'. The regulatory pathway for these approvals has historically been designed for chemical substances, and can be disproportionately

⁸EPA. Hazardous Substances and New Organisms (HSNO) Act 1996 – Regulating Pesticides in New Zealand. epa.govt.nz.

burdensome for biological agents with low risk profiles. As organic demand grows under the NOS, the EPA should review whether an expedited or streamlined approval pathway for organic-compatible biological inputs would be appropriate.

4. Ministry for the Environment (MfE)

4.1 Overview

MfE holds several high-profile policy instruments — particularly relating to freshwater and emissions — that intersect materially with organic agriculture, even though most do not reference it explicitly. The OPPA 2023 creates an alignment opportunity: organic farming's structural exclusions (synthetic nitrogen, high stocking rates) place it in strong compliance with MfE's freshwater and emissions policy directions.

4.1a National Policy Statement for Freshwater Management 2020 (NPS-FM)

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	National Policy Statement (Resource Management Act)
Organic Reference	Implicit — agricultural nitrogen is primary driver of freshwater degradation NPS-FM addresses
Issue	Organic agriculture not identified as a preferred land use or compliance pathway

The NPS-FM 2020 requires regional councils to maintain or improve freshwater health across New Zealand's rivers, lakes, and aquifers. Agriculture — particularly high-stocking dairy with synthetic nitrogen fertilisers — is the primary source of the nitrate leaching the NPS-FM is designed to address. Research by Dr Mike Joy and others has established that organic dairy systems eliminate the primary mechanism of nitrate contamination: synthetic nitrogen fertiliser application.⁹

The NPS-FM currently makes no reference to organic production systems as a preferred approach for achieving freshwater targets, despite organic systems being structurally aligned with NPS-FM objectives. Regional plans developed under the NPS-FM framework should be encouraged to recognise certified organic status as presumptive compliance with nitrogen management requirements where evidence supports this. MfE should issue guidance to regional councils on the relationship between OPPA-certified organic operations and NPS-FM obligations.

4.1b National Environmental Standards for Freshwater (NES-F)

Status	NEAR-TERM ALIGNMENT REQUIRED
Instrument	Regulations under Resource Management Act 1991
Organic Reference	Implicit — NES-F caps synthetic nitrogen at 190kg N/ha/year for pastoral farming
Issue	Organic operators already exceed this standard but receive no regulatory acknowledgement

The NES-F caps the application of synthetic nitrogen fertiliser for pastoral farming at 190 kilograms per hectare per year. Organic operators, who are prohibited from applying any

⁹Ministry for the Environment (2020). National Policy Statement for Freshwater Management 2020. Wellington: MfE.

synthetic nitrogen under both current voluntary standards and the forthcoming NOS, are already in compliance with this requirement by definition. However, the NES-F makes no provision for organic farms and does not recognise organic certification as evidence of compliance.¹⁰

A formal equivalence recognition should be established: OPPA-approved organic operators should be treated as presumptively compliant with the synthetic nitrogen cap, reducing administrative burden and providing a regulatory incentive for conversion. This would require either an amendment to the NES-F or a guidance notice from MfE.

4.1c Second Emissions Reduction Plan (ERP2) 2026-2030

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	Statutory Emissions Reduction Plan (Climate Change Response Act 2002)
Organic Reference	Implicit — agriculture is 50% of NZ emissions; no reference to organic systems
Issue	Organic agriculture not identified as a mitigation pathway in ERP2

The ERP2 (published December 2024) covers the 2026-2030 period and takes a technology-led approach to agricultural emissions reduction. It identifies methane inhibitors, low-methane genetics, and precision agriculture as primary tools. Organic agriculture — which eliminates synthetic nitrogen (a nitrous oxide source) and typically operates at lower stocking rates (reducing enteric methane) — is not identified as a mitigation pathway.¹¹

This is a significant omission. Nitrous oxide from synthetic nitrogen fertiliser is a long-lived, potent greenhouse gas. The NOS's prohibition on synthetic nitrogen, once mandatory from 2028, will mean that all OPPA-certified organic operators have already eliminated this emissions source. The ERP2 should be updated — or its successor ERP3 should include — a recognition of OPPA-certified organic production as a verified, measurable emissions reduction pathway, with soil carbon sequestration potential also incorporated into reporting frameworks.¹²

¹⁰Ministry for the Environment (2020). National Environmental Standards for Freshwater. Wellington: MfE.

¹¹Ministry for the Environment / MPI (2024). Second Emissions Reduction Plan (ERP2) 2026-2030. Wellington.

¹²MPI (2025). Climate Change and the Primary Industries. mpi.govt.nz.

5. Ministry of Foreign Affairs and Trade (MFAT)

5.1 Overview

MFAT's relevance to organic agriculture arises from New Zealand's existing organic equivalence arrangements and free trade agreements — particularly with the EU and UK. Organic equivalence recognition underpins preferential access for New Zealand organic exports to key markets, and its continuation depends on formalising a bilateral trade agreement on organic products anchored to the NOS.

5.1a NZ-EU Organic Equivalence — Status, Risk, and Strategic Window

Status	NEAR-TERM ACTION REQUIRED
Instrument	Existing EU equivalence recognition + NZ-EU FTA (Chapter 7: Sustainable Food Systems)
Organic Reference	Direct — NZ organic export access to the EU market
Issue	Existing equivalence extended to 2036 by EC proposal; a formal bilateral trade agreement on organic products must replace it before then — and the NOS is the prerequisite

Note: The EU equivalence position described in earlier drafts of this paper has been updated to reflect a significant regulatory development of December 2025. New Zealand is one of 11 countries whose organic production and control systems have historically been recognised as equivalent to the EU's under Regulation (EC) No 834/2007 — alongside Argentina, Australia, Canada, Japan, the US, and others. This recognition has given New Zealand organic exporters direct, preferential access to the EU market. It was due to expire on 31 December 2026 under the transition to EU Regulation 2018/848.¹³

In December 2025, the European Commission published a proposal — COM(2025) 780 — to extend equivalence recognitions for these 11 third countries to 31 December 2036, to avoid disruptions in the trade of organic products while bilateral trade agreements are negotiated. New Zealand is explicitly named in the proposal. The extension is not yet enacted as legislation but is expected to proceed given its stated rationale and broad trading partner support.¹⁴¹⁵

This development changes the urgency framing without eliminating the underlying requirement. The Commission's proposal states explicitly that new bilateral trade agreements on organic products must be negotiated and concluded with each of the 11 countries — the extension to 2036 is a bridge, not a destination. The NZ-EU FTA, in force since May 2024, is the natural vehicle for a bilateral organic trade agreement. The National Organic Standard is the prerequisite: the EU will require a functioning statutory standard against which to assess equivalence before concluding any bilateral organic trade agreement.

¹³OPTA Europe (2026). Revision of the Organic Regulation: EU organic industry welcomes limited progress but is concerned by the move to withdraw from equivalence. opta-eu.org, January 2026. Recognised equivalent third countries include New Zealand.

¹⁴European Commission (2025). COM(2025) 780 final: Proposal to amend Regulation (EU) 2018/848. 16 December 2025. Proposes extending equivalence recognitions for 11 third countries including New Zealand to 31 December 2036 to avoid trade disruptions.

¹⁵European Commission (2025). Organic Rulebook Fit for the Future. agriculture.ec.europa.eu, 17 December 2025.

The strategic implication is that New Zealand now has a workable window — approximately a decade — but should not treat it as an excuse for inaction. MFAT should initiate technical exchanges with the European Commission now, benchmarking the draft NOS against EU Regulation 2018/848, so that when the NOS is finalised New Zealand is ready to move immediately into formal bilateral negotiations. Waiting until NOS mandatory commencement in 2028 before opening dialogue would compress the timeline unnecessarily.

A note of caution from the European organic industry is also relevant: OPTA Europe has publicly expressed concern that the 10-year extension denies any opportunity to revise the existing equivalence agreements in favour of better conditions for EU producers. This signals that when negotiations do open, the EU may seek to tighten equivalence conditions compared to current arrangements. New Zealand should enter those negotiations with a strong, well-evidenced NOS and a clear analysis of where its organic production rules may diverge from EU requirements.¹⁶

5.1b NZ-UK Free Trade Agreement (in force 31 May 2023)

Status	NEAR-TERM ACTION REQUIRED
Instrument	Free Trade Agreement
Organic Reference	Indirect — UK retained EU Organic Regulation 2018/848 post-Brexit
Issue	Separate bilateral organic equivalence agreement required with UK; no 10-year extension applies

The UK equivalence position is distinct and more urgent than the EU position. Following Brexit, the UK retained the EU Organic Regulation as domestic law through its own Organic Products Regulations 2009 (as amended). The NZ-UK FTA does not include organic equivalence provisions. Critically, New Zealand's existing EU equivalence recognition does not automatically extend to the UK post-Brexit — a separate bilateral negotiation is required. The EU's proposed 10-year extension for equivalent third countries does not apply to the UK.¹⁷

The original 2026 deadline for the EU equivalence transition created indirect pressure on the UK position as well. With the EU extension now proposed to 2036, the UK negotiation timeline is less immediately constrained — but it remains a separate requirement that depends on the same NOS prerequisite. MFAT should commission a preparatory analysis of UK organic regulation requirements and develop a negotiating position, with the NOS development timeline driving the schedule.

¹⁷MFAT (2023). New Zealand-United Kingdom Free Trade Agreement. In force 31 May 2023.

6. Ministry of Health and Health New Zealand

6.1 Overview

The Ministry of Health and its successor body Health New Zealand hold several policies governing food provision and nutrition guidance across hospitals, schools, and population health settings. None of these policies currently makes any reference to organic food specifically, but several are affected by OPPA 2023 in ways that warrant at minimum a guidance update.

6.1a National Healthy Food and Drink Policy (3rd Edition, 2023)

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	National Policy (Health NZ / Ministry of Health)
Organic Reference	None — policy classifies foods by nutritional value only
Issue	Organic status not recognised as a sustainability criterion despite 3rd Ed. additions

The National Healthy Food and Drink Policy, third edition (2023), applies to all food and drink provided by Health New Zealand and Ministry of Health facilities. Notably, the third edition introduced sustainability measures into the policy framework, acknowledging the environmental dimensions of food procurement alongside nutritional criteria. However, it makes no reference to organic food, certified organic procurement, or the OPPA 2023 regulatory framework.¹⁸

Given that the third edition explicitly added sustainability as a policy dimension, the OPPA 2023's creation of a verified, government-administered organic standard creates an opportunity to align. Future editions should consider whether OPPA-certified organic products should be accorded preferential weighting in Health NZ procurement criteria on sustainability grounds, particularly for specific product categories where organic premiums are modest (e.g. processed vegetables, cereals).

6.1b Eating and Activity Guidelines for New Zealand Adults (2020)

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	Ministry of Health population nutrition guidance
Organic Reference	None — guidelines address dietary patterns, not production methods
Issue	Acknowledgement of environmental sustainability dimensions does not extend to organic

The 2020 Eating and Activity Guidelines acknowledge environmental sustainability as a consideration in healthy eating, including references to greenhouse gas emissions, freshwater quality, and land use. However, they do not reference organic food production, certified organic products, or the role of organic systems in reducing pesticide exposure and

¹⁸Health New Zealand / Te Whatu Ora (2023). National Healthy Food and Drink Policy, 3rd Edition. health.govt.nz.

supporting environmental outcomes. Post-OPPA, a verified definition of 'organic' now exists for New Zealand products, which should at minimum be acknowledged in the guidelines when discussing sustainable dietary choices.¹⁹

6.1c Healthy Food and Drink Guidance – Schools (2020)

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	Ministry of Health / Ministry of Education – Schools guidance
Organic Reference	None
Issue	No reference to organic produce in school food guidance despite growing availability

The Ministry of Health's Healthy Food and Drink Guidance for Schools, published in 2020, predates the OPPA 2023. It classifies food items using a traffic light system based on nutritional content but makes no reference to organic produce, locally grown food, or procurement sustainability. As the OPPA creates a nationally recognised organic standard, future revisions should consider whether OPPA-certified produce should be acknowledged as a preferred option where cost-effective.²⁰

¹⁹Ministry of Health (2020). Eating and Activity Guidelines for New Zealand Adults. Wellington: MOH.
²⁰Ministry of Health (2020). Healthy Food and Drink Guidance – Schools. Wellington: MOH.

7. Ministry of Education

7.1 Overview

The Ministry of Education's primary organic-relevant policy domain is the Ka Ora, Ka Ako (Healthy School Lunches) programme, which provides nutritious meals to approximately 40% of New Zealand schools. The programme's nutrition standards were developed in consultation with MPI and the Ministry of Health but contain no reference to organic produce.

7.1a Ka Ora, Ka Ako – Healthy School Lunches Nutrition Standards

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	Ministry of Education Programme – Nutrition Standards
Organic Reference	None
Issue	Significant government food procurement programme with no organic policy

The Healthy School Lunches programme is one of New Zealand's largest government food procurement exercises, providing lunches across a significant proportion of the country's schools. Nutrition standards require meals to meet minimum weight and vegetable/salad requirements and classify foods as green, amber, and red. MPI is referenced as the authority on food safety standards. However, the programme makes no reference to organic produce, locally grown food, or environmental sustainability criteria in procurement.²¹

The OPPA 2023 creates an opportunity to introduce an optional preference for OPPA-certified organic produce in the programme's procurement guidelines — not as a mandatory requirement, but as a voluntary criterion where costs are comparable. Given the programme's scale, even a modest preference would represent a significant market signal for the organic sector. The Ministry of Education should be invited to engage with the NOS development process to explore this alignment.

7.1b School Boards – Healthy Food and Nutrition Regulations

Status	ONGOING ALIGNMENT OPPORTUNITY
Instrument	Education (School Boards) Amendment Regulations 2022
Organic Reference	None
Issue	No guidance to school boards on organic food as a nutrition or sustainability option

The Education (School Boards) Amendment Regulations 2022 require school boards to promote healthy food and nutrition to students. Health New Zealand has published guidelines and toolkits to support this requirement. Neither the regulations nor the supporting guidance references organic food. Following OPPA 2023, a simple update to Health NZ's school food toolkit to acknowledge OPPA-certified organic produce as a recognised option

²¹Ministry of Education. Healthy School Lunches Programme (Ka Ora, Ka Ako). education.govt.nz.

would improve coherence and support school boards seeking to make sustainability-aligned food choices.²²

²²Ministry of Education (2022). Education (School Boards) Amendment Regulations 2022 – Healthy Food and Nutrition Requirements.

8. Statistics New Zealand

8.1 Overview

Stats NZ is not a policy agency, but its agricultural data collection is a critical input into both policy development and the organic sector's ability to make evidence-based arguments to government. A recent and significant change in Stats NZ's data collection warrants recognition.

8.1a Agricultural Production Survey 2024 – Organic Farm Question

Status	POSITIVE DEVELOPMENT – FOLLOW-UP REQUIRED
Instrument	Agricultural Production Survey (Stats NZ)
Organic Reference	Direct — new question added to identify whether farms are organic
Issue	First-time data collection; methodology needs to align with OPPA definitions

The 2024 Agricultural Production Survey included, for the first time, a question to identify whether a farm is organic. This is a significant policy development: for the first time, New Zealand will have nationally representative, government-collected data on the number of organic farms, their geographic distribution, and their scale. This data will be foundational for evidence-based organic policy going forward.²³

Two follow-up actions are required. First, Stats NZ should ensure that the definition of 'organic farm' used in the survey aligns with the OPPA 2023 definition of an approved organic operator, as the standard becomes mandatory. Second, Stats NZ should develop a plan for ongoing data collection on organic farm performance, including environmental indicators (nitrogen use, stocking rates, biodiversity measures), to enable cross-agency policy analysis linking OPPA compliance with NPS-FM, NES-F, and ERP2 outcomes.

²³Stats NZ (2024). Agricultural Production Statistics: June 2024 (Final) – Note on new organic farm question. datainfolplus.stats.govt.nz.

9. Cross-Cutting Themes and Gaps

9.1 The Regulatory Coherence Problem

The survey above reveals a consistent pattern: organic agriculture intersects with government policy across six separate agencies and at least fifteen distinct policy instruments, yet until the OPPA 2023 there was no statutory anchor to coordinate these intersections. The result is a fragmented policy landscape in which organic agriculture is variously: ignored (Ministry of Education nutrition guidelines), implicitly accommodated without acknowledgement (NPS-FM, NES-F), treated as a voluntary niche (MPI's food safety policy), and structurally aligned but unrecognised (MfE emissions policy).

The OPPA 2023 provides, for the first time, a common definitional and regulatory platform across all these domains. The opportunity now is to build the cross-agency coherence that the new law makes possible.

9.2 The Missing Instruments

Research for this paper identified three significant policy gaps where organic agriculture has no representation at all:

- **Government Procurement Policy:** The New Zealand Government Procurement Rules contain no reference to organic products or to OPPA-certified organic status as a sustainability criterion. As one of the country's largest food buyers (through health facilities, school lunches, and correctional services), the government has significant market influence that could be deployed in support of the organic sector — but there is no policy framework to do so.
- **Regional Planning Guidance:** While the NPS-FM provides the framework for regional freshwater planning, MfE has issued no specific guidance to regional councils on how organic certification might be relevant to farm environment planning, consent conditions, or freshwater outcome reporting. This is a material gap given the structural alignment between organic systems and freshwater objectives.
- **Agricultural Trade Strategy:** New Zealand has no explicit organic trade strategy. New Zealand's EU organic equivalence is currently protected until a proposed 2036 deadline under a December 2025 European Commission proposal, but this must be replaced with a formal bilateral trade agreement on organic products. The Organic Exporters Association's Official Organic Assurance Programme provides operational export pathways, but there is no government-level strategy articulating the equivalence negotiation timeline or positioning NZ organic as a sovereign export priority within the MFAT trade agenda.

9.3 The WorkSafe Dimension

WorkSafe New Zealand administers occupational health and safety requirements for agriculture under the Health and Safety at Work Act 2015. WorkSafe's agriculture priority plan focuses on dairy, beef, and sheep farming, and its guidance on agrichemical handling is relevant to organic transitioning — specifically, the reduction in chemical handling exposure that organic systems entail. WorkSafe guidance does not currently acknowledge organic certification as relevant to workplace chemical risk profiles. A guidance note from WorkSafe to the effect that OPPA-certified organic operations, by virtue of their prohibited inputs list,

have reduced agrichemical handling obligations would be both accurate and useful for transitioning operators.²⁴

²⁴WorkSafe NZ. Agriculture Sector – Priority Plan and Health and Safety Codes of Practice. [worksafe.govt.nz](https://www.worksafe.govt.nz).

10. Priority Actions and Recommendations

10.1 Immediate (Prior to NOS Mandatory Commencement, 2028)

- MPI: Replace the NZFSA Policy on Organic Food Background Paper with a new policy statement that accurately reflects the OPPA 2023 framework, MPI's role as the organic approval authority, and the relationship between organic approval and food safety regulation.
- MFAT/MPI: Initiate technical exchanges with the European Commission on organic equivalence, benchmarking the draft NOS against EU Regulation 2018/848 and identifying gaps. The EU Commission's December 2025 proposal extends New Zealand's existing equivalence to 2036, but a formal bilateral trade agreement must replace it before then — and the NZ-EU FTA is the vehicle. Early preparatory work ensures New Zealand is ready to move to formal negotiations the moment the NOS is finalised.
- MFAT/MPI: Commence a UK organic equivalence analysis as a separate and more immediate priority. Unlike the EU, where the 10-year extension provides a longer window, the UK has no equivalent extension arrangement in place. A bilateral organic equivalence protocol under the NZ-UK FTA is required, and the NOS is the same prerequisite.
- MPI: Develop and publish a cross-reference guide linking ACVM-registered agricultural inputs to NOS permitted/prohibited status, to support operator compliance planning during the transition period.

10.2 Near-Term (2026-2028 Transition Period)

- MfE: Issue guidance to regional councils on the relationship between OPPA-certified organic operations and NPS-FM and NES-F compliance, including the presumptive nitrogen compliance case.
- EPA/MPI: Establish a formal interagency protocol linking HSNO substance approvals to NOS permitted inputs review, and develop an expedited approval pathway for organic-compatible biological control agents.
- MfE: Include organic agriculture in the ERP3 planning process as a verified emissions reduction and soil carbon pathway, with measurement methodology developed in partnership with MPI and Manaaki Whenua.
- Stats NZ/MPI: Align the Agricultural Production Survey organic farm question with OPPA definitions, and develop a plan for organic farm environmental performance data collection.

10.3 Ongoing Alignment Opportunities

- Ministry of Health / Health NZ: Update the National Healthy Food and Drink Policy (4th edition) to include OPPA-certified organic produce as a preferred sustainability criterion in procurement.
- Ministry of Education: Develop an optional organic procurement preference for the Ka Ora, Ka Ako Healthy School Lunches programme, engaging with the OPPA approved operator register once operational.

- MPI: Incorporate the organic sector explicitly into the Strategic Intentions 2028 refresh as a priority export growth pathway, with the NOS implementation timeline and equivalence negotiations as key milestones.
 - Government Procurement: Review New Zealand Government Procurement Rules to consider whether OPPA-certified organic status should be recognised as a sustainability criterion in food-related government procurement.
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11. Conclusion

The Organic Products and Production Act 2023 is a legislative milestone, but it is not self-implementing. Its full strategic value to New Zealand depends on the coherence of the policy environment it sits within. This paper has identified that organic agriculture intersects with policies and instruments across at least seven government agencies — and that most of these instruments were written under pre-regulatory assumptions that are now outdated.

The core argument of this paper is that the OPPA 2023 should be treated not merely as an MPI administrative matter, but as a cross-government policy alignment event. The sectors that stand to benefit most immediately are freshwater management, agricultural emissions, and export trade — areas where organic systems are already in substantial alignment with government policy objectives, but where that alignment is invisible because no formal policy recognition exists.

With the National Organic Standard mandatory commencement date of approximately 2028 approaching, the window for proactive cross-agency alignment is now. The recommendations in Section 10 are sequenced to capture the most time-sensitive opportunities while building the longer-term policy coherence that will make New Zealand's organic sector a recognised and rewarded contributor to the government's environmental and export goals. On the trade front, a December 2025 European Commission proposal has extended New Zealand's existing EU organic equivalence to 2036 — providing a workable window — but a formal bilateral trade agreement on organic products must still be negotiated and concluded before that date. The UK bilateral equivalence requirement remains distinct and more immediately pressing.

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