



Corner Ruakura &  
Morrinsville Roads  
Private Bag 3221  
Hamilton 3240  
New Zealand

Ph+64 7 858 3750  
Fax +64 7 858 3751

[dairynz.co.nz](http://dairynz.co.nz)

15 June 2026

Committee Secretariat  
Primary Production Committee  
Parliament Buildings  
Wellington

[pp.legislation@parliament.govt.nz](mailto:pp.legislation@parliament.govt.nz)

## **DairyNZ submission to the Primary Production Committee on the Hazardous Substances and New Organisms Amendment Bill**

1. DairyNZ welcomes the opportunity to comment on the Hazardous Substances and New Organisms Amendment Bill (the Bill). We support the Bill's overall intent to improve the efficiency, clarity, and proportionality of regulatory pathways while maintaining appropriate protections for human health and the environment.

### **About DairyNZ**

2. DairyNZ is the industry-good body representing New Zealand's 11,000 dairy farmers. We seek to progress a positive future for New Zealand dairy farming through enhanced sustainability, profitability and competitiveness. In the year ended June 2025, New Zealand dairy exports generated approximately \$27 billion, accounting for one in every four export dollars earned by New Zealand. Dairy farming and processing contribute around \$20 billion a year to GDP, representing 3-4% of total GDP, and the sector employs over 55,000 people, including 40,000 on farms and 15,000 in processing.

### **Executive Summary**

3. DairyNZ supports the Bill's objective of streamlining application processes, improving regulatory efficiency and transparency, and enabling more risk-proportionate decision-making under the HSNO regime.
4. DairyNZ encourages the Committee and officials to ensure the supporting regulations, notices, and operational settings give practical effect to the Bill's intent—particularly for lower-risk products, internationally assessed products, research uses, and time-sensitive applications relevant to agriculture.

### **FEEDBACK**

5. DairyNZ welcomes reforms that are intended to make the HSNO system more workable in practice. Farmers and the wider agricultural sector need timely access to products and tools that support environmental outcomes, animal health and welfare, biosecurity preparedness, and on-farm productivity. Regulatory settings should remain robust, but also proportionate and responsive to risk.

6. The current regulatory pathway affects our work in two main ways:
  1. Restrictions to the ability to research and test potential greenhouse gas mitigation solutions for dairy farmers; and
  2. Restrictions and delays in accessing biosecurity, animal health and welfare risk management tools for dairy farmers in the event of emerging or developing pests or diseases.
7. DairyNZ supports changes intended to expand proportionate approval pathways and improve the efficiency of application processes, including greater flexibility for lower-risk applications and clearer, more consistent administrative processes.

### **Recognising overseas regulator assessments**

8. DairyNZ supports the Bill's intent to enable greater reliance on assessments undertaken by recognised international regulators where appropriate. Where a product has already been robustly assessed in a comparable overseas jurisdiction, that information should help support a more efficient New Zealand process while still allowing New Zealand-specific risks and conditions to be considered.
9. These changes matter for farmers, veterinarians, and other users who need timely access to products to manage new or emerging pests and diseases, support animal health and welfare, and address smaller-volume or niche needs. Delays in access can have wider consequences for farm resilience, animal welfare, biosecurity preparedness, and, in some cases, public health and emissions outcomes.

### **Greater efficiency and business certainty**

10. DairyNZ welcomes changes intended to reduce unnecessary cost, delay, and uncertainty for applicants. For a small market such as New Zealand, regulatory complexity can discourage investment and reduce the availability of innovative or niche products for farmers.
11. This is particularly relevant where products serve smaller volume uses, emerging needs, or innovative technologies. If approval pathways are too slow, costly, or uncertain, New Zealand farmers may face delayed access to products that are already available in other jurisdictions.
12. DairyNZ also supports changes that improve clarity around the use of technical information and assessments in support of applications. Clear, credible pathways for using external expertise and supporting evidence should help improve consistency and support more timely decision-making.

### **Transparency of levy processes**

13. The proposed Bill lacks key governance safeguards relating to levies, creating uncertainty about how funds are accumulated, managed, and applied. In particular, the absence of a memorandum account allows surplus funds to build without a clear strategy for their use, while the lack of a statutory purpose clause means levy revenue could potentially be applied to activities beyond the intended regulatory scope. This is compounded by the absence of a defined review cycle or performance reporting, limiting transparency and accountability over how levy funds are used.
14. Introducing a clear statutory purpose clause in the Act would provide certainty that levy revenue is directly aligned to funding the EPA's actual and reasonable regulatory activities, strengthening confidence for levy payers that contributions are used as intended. Provisions in the Act establishing a memorandum account, supported by annual public reporting, would enhance transparency over revenue, expenditure, and any surplus. Mandating a three-yearly levy review, alongside clear provisions on calculation methodology would improve predictability, fairness, and overall confidence in the levy system.

## **Sound regulatory outcomes**

15. At the same time, much of the practical effect of these reforms will depend on the detail of regulations, notices, guidance, and operational implementation. DairyNZ therefore encourages the Government to ensure that the broader package delivers timely, proportionate, and workable pathways for lower-risk, research, and time-sensitive applications relevant to the agricultural sector, while maintaining appropriate safeguards. We would welcome the opportunity to comment on exposure drafts of the Regulations as they become available.

DairyNZ would welcome the opportunity to engage further with officials and the Committee on these issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Kearney', with a small flourish at the end.

**Laura Kearney**  
Head of Policy, DairyNZ

Contact for further information: [laura.symes@dairynz.co.nz](mailto:laura.symes@dairynz.co.nz)