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Committee Secretariat
Primary Production Committee
Parliament Buildings
Wellington

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DairyNZ submission to the Primary Production Committee on the Agricultural Compounds and Veterinary Medicines Amendment Bill

1. DairyNZ welcomes the opportunity to comment on the Agricultural Compounds and Veterinary Medicines Amendment Bill ('the Bill'), which seeks to improve the efficiency, transparency, and certainty of the approval process for agricultural and horticultural products.

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 amendments to improve access to greenhouse gas mitigation options for farmers and to enable more proportionate, flexible, and efficient decision-making.
4. DairyNZ encourages the Government to ensure the supporting regulations and operational settings give practical effect to the Bill's intent while ensuring the trust and confidence of our trading partners is maintained.

FEEDBACK

5. DairyNZ welcomes changes that improve the efficiency, transparency, and certainty of the approval process for agricultural and horticultural products. Farmers are at the forefront of addressing major challenges, such as climate change and biosecurity, and they need timely access to effective products that support better environmental outcomes, biosecurity preparedness, animal health and welfare, and farm productivity.

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 that are intended to provide more proportionate approval pathways, including broader use of exemptions for lower-risk products and more flexible processes for certain product changes and applications.

Recognising overseas regulator assessments

8. We support the Bill introducing new section 20(aa) and section 20A, which require the Director-General to have regard to applicable assessments from recognised overseas regulators with the establishment of a mechanism for recognising approvals given by those regulators.
9. These changes matter for farmers, veterinarians, and other users who need timely access to products to manage new or emerging biosecurity pests and diseases, support animal health and welfare, and address smaller-volume or niche needs. Unnecessary delays in access can have wider consequences for farm resilience, animal welfare, biosecurity preparedness, and, in some cases, public health and emissions outcomes.
10. While overseas information could previously be taken into account in practice, the Bill formalises this approach by requiring the Director-General to have regard to applicable assessments from recognised overseas regulators. DairyNZ supports this change, as it should improve efficiency and help streamline New Zealand's assessment process.
11. In DairyNZ's view, where a product has already been assessed in an overseas jurisdiction with agricultural systems comparable to New Zealand, that assessment should help inform a more efficient New Zealand process, including, where appropriate, a more proportionate level of scrutiny.

Timely and transparent decision making

12. DairyNZ welcomes changes intended to reduce timeframes and costs for applicants. At present, high costs, uncertainty, and delays in moving products from development to commercialisation create significant barriers.
13. For international suppliers, New Zealand's relatively small market can compound these challenges and reduce the incentive to enter the market. As a result, New Zealand farmers and growers may have access to fewer new, more effective, and potentially lower-risk products than are available overseas.
14. The Bill also appears to strengthen the ACVM data assessor framework by clarifying how technical assessments can be provided in support of applications. For inhibitors, this should improve clarity around the use of external expertise and third-party information, which may help improve the consistency and quality of assessments while supporting more timely decision-making.
15. However, the Bill does not appear to establish a specific emergency-use pathway, fast-track process, or targeted mechanism for niche products, minor species products, or urgent biosecurity responses. This means it does not fully resolve the broader issue of timely access to biosecurity, animal health, and animal welfare risk management tools. DairyNZ therefore encourages the Government to continue improving the wider regulatory framework, including associated regulations

and operational processes, so that genuinely low-risk or urgent products can be assessed and made available in a timely way while maintaining appropriate safeguards.

Sound regulatory outcomes

16. DairyNZ also notes that much of the practical detail that will determine how these changes operate in practice sits in regulations rather than in the Bill itself. The Bill therefore provides an important enabling framework, but the extent to which it improves timeliness, proportionality, and access to products will depend significantly on the design of the supporting regulations and their implementation. 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 stylized, cursive script.

Laura Kearney
Head of Policy, DairyNZ

Contact for further information: laura.symes@dairynz.co.nz