



16 May 2024

Email: mpi.forestry@mpi.govt.nz

Tēnā koe

Attached are the comments that the New Zealand Food and Grocery Council wishes to present on *New Zealand's Legal Harvest Assurance System – Issues Paper One: the legal harvest assurance framework*.

Ngā mihi nui

A handwritten signature in blue ink, appearing to be "Raewyn Bleakley".

Raewyn Bleakley
Chief Executive



Call for submissions: New Zealand's Legal Harvest Assurance System – Issue Paper one: The legal harvest assurance framework

Submission by the New Zealand Food and Grocery Council

May 2024

NEW ZEALAND FOOD AND GROCERY COUNCIL

1. The New Zealand Food and Grocery Council (**NZFGC**) welcomes the opportunity to comment on *New Zealand's Legal Harvest Assurance System – Issues Paper One: the legal harvest assurance framework*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total goods and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

THE ASSURANCE FRAMEWORK

3. Issues paper one seeks to start a conversation about the operational details required to implement New Zealand's statutory legal harvest assurance system. Feedback will help MPI to develop options for further consultation on how to implement the Forests (Legal Harvest Assurance) Amendment Act 2023 (**The Act**).
4. Issues paper one focuses on the core concepts of the Act to set the scope. These include:
 - identifying relevant laws,
 - relevant products,
 - relevant thresholds,
 - due diligence, and
 - exporter requirements.

COMMENTS

5. The NZFGC represents manufacturers of fast moving consumer goods (FMCG) products typically sold in retail grocery environments that may contain timber products. Some examples of such products include facial tissues, toilet paper, wipes, sanitary products, paper plates and wooden cutlery.
6. Many of our members already have a certification system for the paper or timber they use in manufacturing, and/or they import recycled paper for further processing. They also have extensive experience of the assurance system operated by Australia under their Illegal Logging Prohibition Regulation 2012.
7. NZFGC would encourage MPI to align with the current Australian legal harvest assurance requirements as far as possible, due to the significant trade between our two nations and the many other common regulatory requirements to help facilitate this (eg, the joint Australia and New Zealand Food Standards Code).
8. We would also encourage MPI to review and accept a range of existing certification processes (PEFC and FSC for example) for the eventual legislative framework, rather than limiting assurance to any single certification process.
9. The feedback NZFGC has received from members on their use of the Australian legal harvest assurance system (the scope and the detailed regulatory requirements) has been

positive, so we would encourage a similar/aligned system is adopted in New Zealand.

10. Thank you again for the opportunity to comment on *New Zealand's Legal Harvest Assurance System – Issues Paper One: the legal harvest assurance framework*. NZFGC welcome the opportunity to input further as required.