



To: Te Papa Atawhai Department of Conservation (DOC) and
Toitū Te Whenua Land Information New Zealand (LINZ)

Submission on:

Long-term Insights Briefing

Date: 11 November 2021

Submitter:

Jeff Howe
Technical Manager – Animal Health
Agcarm – representing NZ’s animal medicine and crop protection industries
111 The Terrace
Wellington

Phone: 04 499 4225

Email: jeff.howe@agcarm.co.nz

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1. Introduction

- 1.1 Agcarm is the industry association representing manufacturers, suppliers and distributors of animal health and crop protection products in New Zealand. We welcome the opportunity to engage with the Government on this Long-term Insights Briefing that explores how innovation in technology and information can support us to achieve thriving biodiversity in Aotearoa New Zealand.
- 1.2 Agcarm strongly supports a focus on new and improved information and biotechnology to find ways to better care for Aotearoa New Zealand's biodiversity.

2. Information

- 2.1 Greater use of information for planning, surveillance and monitoring of biodiversity, and in weed and pest control, will help to increase the targeting and effectiveness of these programmes, which is fully supported.

3. Biotechnology

- 3.1 Our main focus in this submission is on the application of advances in biotechnology which we believe offer substantial benefits that New Zealand risks missing out on.
- 3.2 New Zealand has one of the strictest regimes for biotech products in the world, and we are now being left behind on adoption of the latest science and innovation. Globally, biotechnology techniques are contributing to reduced greenhouse gas emissions from agriculture, decreased pesticide spraying, and improved pest and disease control, all of which contribute to enhanced biodiversity. With the 2001 Royal Commission enquiry into biotech recommending that we 'keep our options open and proceed carefully', we believe it is now time for reconsidering the benefits and risks of biotechnology, noting the significant technological advances made since then.
- 3.3 In the last 20 years, the risks of using gene technologies and associated safety mechanisms have changed significantly through the research and the implementation of precision techniques. New techniques such as gene editing, and gene drives have the potential to provide ground-breaking tools to protect our native species against harmful pests and diseases while providing safety mechanisms for managing risks. For example, gene editing could be used to stop introduced species such as possums, rats, stoats, and non-indigenous wasps from reproducing in New Zealand, to reduce the burden on our native plants and animals, as well as bee colonies.
- 3.4 Gene-technology could also be used to stop diseases of taonga species e.g., Kauri dieback. An almost analogous story is unfolding in US on the American Chestnut

conservation front. This iconic North American tree is dying from blight. “Even” the GMO route has been pursued as one of the solutions to save the tree (introduction of oxalate oxidase gene from wheat). So, gene editing to prevent the spread of fungal disease in kauri could be a realistic proposition. [Sierra Club endorsement of disease-resistant chestnut tree divides the anti-GMO movement | Genetic Literacy Project](#)

- 3.5 The Long-term Insights Briefing provides an important opportunity for considering the potential benefits of new gene technologies for improving stewardship of NZ’s biodiversity and whether the current regulatory regime is appropriate and is working effectively.
- 3.6 We believe the regulation of biotechnology in New Zealand urgently need updating to reflect the current state of technology to deliver better outcomes, not only for biodiversity, but for wider objectives, such as reducing greenhouse gas emissions, and improving human health and food production systems.

4. Recommendation

- 4.1 We recommend there is a review aimed at reducing regulatory requirements for the registration of biotech products in New Zealand that recognises developments in gene editing technology, with an appropriate regime for managing risk. The sooner this happens, then the quicker we can realise the potential of these technologies to deliver positive outcomes for New Zealand.

5. About Agcarm

Agcarm is the peak New Zealand industry association of companies which manufacture, distribute, and sell crop protection and animal health products. Our mission is to protect and enhance the health of crops, animals, and the environment - through innovation and responsible use of quality products and services.

For over 70 years, Agcarm has taken a lead role in managing issues of importance to the crop protection and animal medicines industries. This involves engaging with politicians, regulators, and stakeholders to ensure that decision-makers take account of industry’s views. It also ensures that industry aligns itself with best practice in the management of pests and disease.

Our members research the safest and best methods to do this. In the crop protection industry, our manufacturers support the use of Integrated Pest Management (using all means available to tackle pests and disease). They research all means of control, including biologicals, to ensure the best and most sustainable result for farmers and growers.

Membership to Agcarm is voluntary, with all applicants requiring Board endorsement before being accepted. Agcarm backs this by ensuring all members comply with a Code of Conduct.

This Code certifies that Agcarm members meet industry standards. Compliance with it is a condition of membership - with companies required to meet a number of obligations. This includes complying with relevant legislation, participating in

environmental stewardship programmes, acting ethically in product promotion and in accordance with the best interests of industry.

Protecting the environment is integral to this, with support and participation of the rural recycling programme Agrecovery being compulsory for members. Companies must also ensure that their products meet an appropriate standard, all people involved with industry products are appropriately trained, and that they are supportive of ensuring environmental sustainability.

In promoting a healthy environment, Agcarm is involved in a number of other stewardship campaigns, within the crop protection and the animal medicines industries.

Bee health is high on the association's agenda with regular campaigning to protect the wellbeing of New Zealand's bee population and ensuring that products are used responsibly. The 'Bee Responsible' awareness campaigns were produced in conjunction with the Rural Contractors and Agricultural Aviators associations to raise awareness of the importance of protecting bees and providing guidance for doing so.

Preventing resistance management in animals and plants is another priority for the association and its members. As part of this, Agcarm leads and supports programmes that prolong the effectiveness of crop protection and animal health products liable to encounter resistance problems, and limit losses should resistance appear.

This includes an integral role in the Wormwise Trust - providing expert advice to farmers on managing worms on farms (anthelmintic resistance) as well as antimicrobial resistance. Agcarm contributed to New Zealand's Antimicrobial Resistance Plan which was submitted to the World Health Organisation in May 2017.

The association's ultimate purpose is to ensure that New Zealand continues to lead the world in producing safe, healthy, and sustainable food by using the best and safest technology. By dealing with an Agcarm member you too will be part of this worthy goal. So, next time you are considering a purchase of a pesticide or animal medicine, ask if the company is an Agcarm member and if they are you can be assured that you are dealing with knowledgeable staff and a quality product.

APPENDIX 1: Agcarm Membership

Agcarm Membership

Agcarm represents around 90 percent of the crop protection, animal medicines and rural retailers industries within New Zealand. Our companies are both local and globally linked, producing products that enable our farmers and growers to supply high-quality food and fibre into domestic and international markets, along with keeping our animals and pets healthy.

Animal Health Manufacturers

- Boehringer Ingleheim
- Ceva Animal Health
- Donaghys
- Elanco Animal Health
- MSD Animal Health
- Zoetis NZ
- Troy Animal Medicines

Crop Protection Manufacturers

- ADAMA New Zealand
- AgriNova NZ Ltd (trading as Grochem)
- BASF New Zealand
- Bayer CropScience
- Donaghys
- Corteva
- FMC
- UPL
- Key Industries
- Ravensdown
- Nufarm
- Syngenta Crop Protection
- Lonza
- Kiwicare

Distributors

- Ashburton Trading Society
- Farmlands Co-operative
- Horticulture
- ICD Group
- New Zealand Farm Source
- PGG Wrightson Ltd
- Venture Exports
- Hodder and Turner

Corporate Associates

- AgriMedia
- Argenta
- Eurofins Agroservices
- Medicines New Zealand
- Peracto New Zealand
- Philstic Labels
- Rural Contractors
- Sumitomo Chemical
- Rainbow chemicals

Individual Associates

- BioGro
- Zespri
- HortNZ
- NZKGI
- Kiwifruit Vine Health
- Hill Laboratories
- RxVet Limited
- Mantissa Corporation
- Agworld
- Ag Services
- NZ Apple and Pears
- Market Access Solutionz
- Renovo Technologies
- NZ Sports Turf Institute
- Molloy Agricultural Spraying
- Intuit Animal Health Consultants
- Tracta
- IPPC
- Redcap solutions
- De Groot
- Ranfurly Orchard Services
- FieldTek
- On Regulatory
- De Sangosse
- Educhem
- JP Munro
- AS Harrison
- AgRecruit
- Dechra