



Meat Industry Association of New Zealand (Incorporated)

Submission to:

**Finance and Expenditure Committee**

On:

**Regulatory Standards Bill**

23 June 2025

**1. Introduction**

- 1) The Meat Industry Association (MIA) is a voluntary, membership-based organisation representing processors, marketers, and exporters of New Zealand red meat, rendered products, and hides and skins. MIA represents 99 percent of domestic red meat production and exports, making the meat industry New Zealand's second largest goods exporter with exports of \$9.9 billion.
- 2) The meat processing sector is New Zealand's largest manufacturing sector that employs over 25,000 people in about 60 processing plants, located mainly in the regions. The sector is a significant employer in many of New Zealand's rural communities and contributes over \$4 billion in household income.
- 3) A list of members is attached (Appendix A). In drafting this submission MIA members were consulted. Individual members, however, may have also made their own submissions.

## 2. Overview

- 4) MIA welcomes the opportunity to comment on the proposed Regulatory Standards Bill ('the Bill').
- 5) Meat processing is a heavily regulated industry. MIA seeks to ensure that the regulatory framework within which meat processors and exporters operate:
  - I. Protects and enhances New Zealand's reputation for delivering safe and high-quality red meat products
  - II. Exemplifies regulatory best practice in that (where applicable) it is:
    - (i) outcome focussed,
    - (ii) risk-based,
    - (iii) underpinned by science, and
    - (iv) cognisant of costs imposed relative to benefits
  - III. Reduces barriers to trade: bilateral and multilateral technical and non-technical barriers to accessing markets are addressed
- 6) MIA does not wish to appear before the Committee.

## 3. Commentary on the Bill

### *Subpart 1—Principles of responsible regulation*

- 7) For businesses—and the communities they support—to thrive, the predominance of the rule of law and the protection of property rights are essential. These foundations provide the certainty and freedom to operate that underpin investment and productivity.
- 8) Innovation and trade will prosper in a regulatory environment that is enabling and no more onerous than necessary to achieve its stated objectives. Proportionality and clarity in regulation are key to maintaining competitiveness and encouraging growth.
- 9) For these reasons, MIA is generally supportive of the principles proposed in Section 8.
- 10) Recognising that legislation that cannot be enforced is of little value, **MIA recommends adding an additional clause to Section 8(a)** (*the importance of maintaining consistency with the following aspects of the rule of law:*):
  - (vi) *the law must be enforceable*
- 11) **MIA also recommends the addition of a further subclause to 8(j)** (*The importance of carefully evaluating—*):
  - (vi) *the likelihood and nature of any unintended consequences*

12) Regarding the clauses under the heading *Taxes, fees and levies* (Section 8) **MIA recommends that clauses be inserted to the Bill to recognise:**

- a) the need for providing transparency concerning the basis for setting rates, and expenditure, of fees and levies and;
- b) the need for contributions of fees and levies to vary in proportion with the extent to which payees use or benefit from services funded by these.

#### *Subpart 2—How principles apply when developing legislation*

13) MIA supports the concept of the *consistency accountability statement*.

#### *Subpart 3—Regulatory stewardship and plans for regularly reviewing legislation*

14) MIA supports the requirements for regulatory stewardship and for regular review of legislation.

#### *Subpart 7—Regulatory Standards Board*

15) MIA supports the functions proposed for the Regulatory Standards Board.

16) MIA is concerned that the proposed board may be perceived as lacking in independence if all members are appointed by the Minister.

17) **MIA recommends that Section 38 be redrafted to require Regulatory Standards Board members to be appointed by Parliament**, possibly involving an independent parliamentary panel including the Chair of the Regulations Review committee.

#### *Part 3: Regulatory reviews and information-gathering powers*

18) MIA supports the components of this section as necessary for the functioning of the Regulatory Standards Board.

19) However, MIA notes that some entities that may be subject to these powers are jointly funded by industries, for example OSPRI Ltd. **MIA recommends that a clause be inserted into Part 3 of the Bill stipulating that the costs associated with providing information for the purpose of informing regulatory reviews must be borne by the Crown.**

#### **MIA Contact**

Chris Houston  
Principal Policy Analyst  
Meat Industry Association of New Zealand (Inc)

## Appendix 1

### MIA members and affiliate members as at 17 February 2025

Members	
Advance Marketing Limited Exporter Membership	Waimarie Meats Partnership
AFFCO NZ Ltd - Membership Levy	Wallace Group LP
Alliance Group Limited	Wilbur Ellis NZ Ltd
Ample Group Limited	Wilmar Trading (Australia) Pty Ltd
ANZCO Foods Ltd	
Ashburton Meat Processors Limited	
Auckland Meat Processors	Affiliate Members
Bakels Edible Oils (NZ) Ltd	Abattoirs Association of NZ
Ballande NZ Ltd	AgResearch
Black Origin Meat Processors	Alfa Laval New Zealand Ltd
Blue Sky Meats (NZ) Limited	Americold NZ Ltd
Columbia Exports Ltd	Aon New Zealand Ltd
Crusader Meats	AsureQuality NZ Ltd
Davmet NZ Limited	AusPac Ingredients NZ Ltd
Fern Ridge Ltd	Beca Ltd
Firstlight Foods Limited	Centreport Wellington
Garra International Limited	CMA CGM Group Agencies (NZ) Ltd
GrainCorp Commodity Management	CoolTranz 2014 Ltd
Greenlea Premier Meats	G-Tech Separation - Bellmor Engineering
Harrier Exports Ltd	Global Life Sciences Solutions New Zealand
Intergrated Foods Consortium	Haarslev Industries New Zealand
Kintyre Meats Ltd	Hapag-Lloyd (New Zealand) Ltd
Lean Meats Oamaru	IBEX Industries Limited
Lowe Corporation Ltd	Intralox LLC
Mathias NZ Limited	Kemin Industries Ltd
Ovation NZ Ltd	Liquistore
Peak Commodities Limited	Maersk A/S
Prime Range Meats	MJI Universal Pte Ltd
Progressive Meats Limited	Oceanic Navigation Ltd
PVL Proteins Ltd	Port of Napier
SBT Marketing (2009) Ltd	Port of Otago Ltd
Silver Fern Farms Ltd	Pyramid Trucking Ltd
Standard Commodities NZ Limited	Rendertech
Taylor Preston Limited	SCL Products Limited
Te Kuiti Meat Processors Limited	Scott Technology Ltd
UBP Limited	Sealed Air - Cryovac
Value Proteins Ltd	Suncorp New Zealand Services Limited