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Farm Assurance: Protecting a Trusted System by Understanding Risk

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This report has been undertaken independently of my role, while still drawing on that experience. Dairy and Horticulture have been included to provide a balanced and sector wide perspective.

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Executive Summary

New Zealand's primary sector is heavily dependent on export markets, driven in part by international confidence in how food is produced. Approximately 82.9% of food and fibre production is exported, generating \$62 billion in revenue. Dairy, red meat, and horticulture account for around 80% of earnings. New Zealand's competitive position is not based on scale, but on credibility, consistency, and integrity, supported through regulation and industry-led assurance programmes.

These programmes provide verified evidence of on-farm practice, traceability, and market claims. While they differ by sector, they collectively support market access, customer confidence, and premium positioning.

This research finds that while assurance systems remain structurally sound and valued, pressure is emerging at farm level as programmes overlap and requirements increase. Evidence from literature, farmer surveys, and industry interviews highlight the risk of duplication, audit frequency, and administrative burden, particularly in multiple frameworks across overlapping farming systems.

Survey results from 53 farmers show that 63% report increasing compliance pressure, with duplication the single biggest contributor. More than half (55%) report assurance is often experienced as a tick-box exercise rather than something that drives improvement. Looking ahead, only 17% indicated they would remain fully engaged if requirements continue to increase, while others would reduce effort or withdraw from voluntary programmes.

While the sample size is limited, alongside literature and interviews this represents an early warning signal of emerging system pressure.

This shift matters because assurance systems rely on more than audits and rules. They depend on accurate records, genuine engagement, and confidence in system value. As requirements become repetitive or poorly understood, records may persist but become less reflective of on-farm reality, weakening the evidence base underpinning market claims.

Industry and trade interviews confirm that when credibility is questioned, market response is not gradual. Trading partners and customers do not differentiate between sectors or programmes; scrutiny is applied at a country level. As a result, response is rapid, structured, and difficult to reverse. Rebuilding trust once it is tested is not only challenging but near impossible.

While assurance erosion may develop slowly through farm-level disengagement, the underlying risk is a weakening of the evidence base supporting New Zealand's market position. The regulatory system may continue to support market access, but assurance programmes remain critical in sustaining integrity-based claims and enabling differentiation beyond the commodity export base.

To manage this risk, industry leadership should reaffirm assurance expectations and assess cross-sector assurance load to identify overlap and duplication driving disengagement. Equivalency and data-sharing should reduce repeated audits where possible, recognising some duplication is unavoidable. Early warning indicators are needed to identify when assurance becomes transactional rather than meaningful, enabling timely intervention before market confidence is affected.

The assurance system is not failing. However, its credibility depends on continued engagement, clarity of purpose, and alignment across sectors. The risk is not losing assurance outright but reaching for it when New Zealand's integrity is tested and finding the evidence no longer carries the weight it once did.

Introduction

New Zealand relies heavily on international and export markets. Unlike larger economies with higher levels of domestic consumption, New Zealand exports a significant proportion of its primary production. *The Situation and Outlook for Primary Industries (SOPI) December 2025* report states that approximately 82.9% of food and fibre production is exported, the sector is forecast to generate \$62 billion in export revenue in 2026. The industry currently supports 14.4% of national employment and contributing 15.3% of New Zealand's GDP.

The Outlook Report further highlights the importance of the dairy, red meat, and horticulture sectors, which contributed approximately NZ\$48.3 billion in export revenue in 2025, accounting for around 80% of New Zealand's total food and fibre export earnings (Table 1) ([New Zealand Ministry for Primary Industries, 2025](#)).

Table 1: Food and fibre sector export revenue 2021–27							
Year to 30 June, NZ\$ million							
Sector	Actual					Forecast	
	2021	2022	2023	2024	2025	2026	2027
Dairy	19,055	21,998	26,008	23,231	27,151	27,390	27,360
Meat and wool	10,376	12,323	12,151	11,367	12,360	13,180	13,820
Horticulture	6,579	6,825	7,088	7,078	8,802	9,220	9,550
Forestry	6,499	6,578	6,353	5,748	6,170	6,280	6,410
Seafood	1,789	1,919	2,097	2,141	2,224	2,150	2,200
Arable	261	252	272	345	338	345	350
Processed food and other products*	3,087	3,228	3,493	3,418	3,338	3,410	3,500
Total export revenue	47,645	53,123	57,462	53,327	60,384	61,980	63,200
Year-on-year % change	0%	11%	8%	–7%	13%	3%	2%

Table 1 ([New Zealand Ministry for Primary Industries, 2025](#)).

The success of these export systems depends on international trust in New Zealand's reputation. This reputation is based not on being the largest global producer, but on the credibility, consistency, and integrity of the systems that support claims around quality, safety, traceability and production standards. These characteristics are not always easily verified by international customers so instead, they rely on proof of regulation systems, assurance programs and on farm processes. As indicated in *Credence Attributes and New Zealand Country of Origin: A Review*, these systems are critical to maintaining New Zealand's reputation in global markets, where “in a competitive global economy, reputation matters” ([Dalziel et al., 2018](#)), particularly for a country like New Zealand, where economic strength relies on the continued growth and diversification of export markets.

At a regulatory level, our ability to export includes legislative frameworks, export certification systems, overseas market access requirements (OMAR), traceability systems, and export eligibility declarations which can sit under key legislation such as the Animal Products Act 1999, Food Act 2014, Biosecurity Act 1993, and the NAIT Act 2012. The Ministry for Primary Industries outlines these requirements in its guidance for exporters, which details how market access rules and official assurances are administered across sectors ([Ministry for Primary Industries \(n.d.\)](#)).

Alongside regulation, industry and commercially led assurance programmes also operate across the primary sector. These include processor supplier programmes, retailer assurance frameworks, and sustainability initiatives. While some of these may interact with regulatory systems, they are not solely functions or extensions

of legislation. Instead, they operate as additional assurance layers that support customer expectations, market positioning, and supply chain consistency.

These programmes operate differently across sectors within the primary industry; however, they are all ultimately shaped by the expectations of large international customers. This includes companies such as Nestlé and Mars, US retailers like Whole Foods and UK supermarkets such as Sainsbury's and Tesco. Across all these markets, there is increasing pressure for stronger proof of credibility, traceability, and on-farm practice to support their own brand claims. As noted by *New Zealand Trade and Enterprise (2025)* in reference to these customer expectations, *"It is vital that suppliers provide transparent supply chain data, including traceability, labour conditions and ethical sourcing"*

This report therefore examines how increasing overlap across assurance programmes is affecting farmer engagement and the credibility of New Zealand's market claims.

It focuses on three key sectors (pillars), within New Zealand Agriculture, Dairy, Horticulture and Red Meat, and explores how pressures such as duplication, transactional compliance, and unclear value at farm level may affect the integrity of assurance signals in market.

Conceptual Framework and Key Definitions

To assess risk within the assurance system, I first need to define how New Zealand products move through global trade. The international supply chain can be understood as being shaped by three key components: the export market, the export customer, and the end consumer.

An export market is best described as being made up of sovereign or regional boundaries. This includes external settings that govern trade, free trade agreements (FTA), including tariff structures and biosecurity requirements. Within those markets, export activity occurs through commercial customers such as importers, distributors, and processors that purchase product through business to business (B2B) relationships.

While those transactions sit between commercial entities, demand is ultimately driven by the end consumer. Changing preferences and consumption patterns can change not only what is exported, but when, where, and in what form. For example, current growing global demand for protein is influenced in part by health and nutrition trends.

In practical terms, the Ministry for Primary Industries provides the regulatory approval required to access export markets, while commercial sales functions within the processing environments establish and maintain relationships with export customers. This distinction is supported by *New Zealand Trade and Enterprise research*, which identifies both the challenge of entering export markets and the need to establish relationships with in-market partners such as distributors and retailers (*New Zealand Trade and Enterprise, 2025*).

While Regulation underpins export access, it is not examined in detail in this report. Instead, regulation is used as a reference point to help understand how the broader assurance environment sits within the export environment.

For the purposes of this report, it is important to maintain a clear distinction between regulatory export systems and commercial assurance programmes.

Rationale

Across the primary sector, assurance programmes operate to support market expectations.

In dairy, two key frameworks, Synlait's *Lead with Pride* and Fonterra's *Co-operative Difference*. Both programmes incentivise farmers to go beyond the regulatory baseline. Synlait "recognises and financially rewards suppliers who achieve dairy farming best practice" (Synlait Milk Limited, 2025), while Fonterra provides "direct recognition of the hard work already put in to improve emissions efficiencies, and to support further gains" (Fonterra Co-operative Group Limited, n.d.).

In horticulture, New Zealand Good Agricultural Practice (NZGAP) provides a framework that "meets the certification requirements for a range of customers... [and is] aligned with NZ regulatory standards," while enabling growers to demonstrate that their systems and practices meet "relevant regulatory and market requirements" (NZGAP, n.d.; Horticulture New Zealand, 2021).

In red meat, the New Zealand Farm Assurance Programme (NZFAP) sits outside regulation and provides an "independently verified production assurance standard" for customers, covering areas such as traceability, food safety, and animal welfare (Beef + Lamb New Zealand (n.d.)).

Across all sectors, there is increasing evidence of compliance complexity, duplication of audits, and growing administrative load. As regulatory and assurance programmes overlap, these pressures are becoming more visible at farm level. This pressure is reflected in *Farm Source* 2026 targets which focus on reducing compliance burden in the Dairy industry, in 2026 (NZ Farm Source, n.d.). While each programme may have been developed to meet a specific market, regulatory, or customer requirement, the combined effect can create a system that is increasingly difficult for farmers to navigate and understand.

The perceived risk is not the assurance systems themselves, but in the way, pressure can influence farmer behaviour over time. As requirements continue to build and customer expectations evolve, engagement can shift from genuine ownership and continuous improvement towards simply meeting minimum requirements and ticking a box. This reflects a move towards transactional compliance, where participation by suppliers is driven by the need to just pass an audit rather than actively engage with the intent of the programmes. While compliance outcomes may still be achieved, the underlying commitment and the integrity of the programmes can be weakened over time.

This shift is important because assurance programmes rely on more than rules and audits. They depend on the active participation of farmers, accurate information, and confidence in the value of the system. Where participants see programmes as repetitive, duplicative, or disconnected, there is a risk that engagement declines. While compliance outcomes may still be achieved, the real value of assurance programmes comes not only from the standards themselves, but from the ownership, pride, and commitment of the farmers whose day-to-day practices give those standards meaning and credibility.

At the same time, strong market demand, favourable commodity prices, and procurement pressures in some sectors are raising questions about the additional value that assurance programmes provide, particularly where the difference between baseline and higher-level compliance is not clearly recognised or financially rewarded. These programmes have historically supported market access, customer confidence, and premium market positioning. However, with demand remaining strong and regulatory systems well established, the additional value at farm level can become less clear.

This report therefore focuses on how increasing overlap across assurance programmes is shaping farmer behaviour and engagement, particularly where these programmes are no longer seen to provide clear value, and what risks this may create for the credibility of New Zealand's market claims over time.

Research Aim

The aim of this research is to examine how increasing overlap across assurance programmes influences producer engagement, ownership, and confidence at a farm level, and how this in turn affects the credibility of New Zealand's market claims.

It explores how producers experience assurance requirements across the dairy, red meat, and horticulture sectors, particularly where they are participating in multiple programmes, customers, and markets.

The research also considers differences between sectors, including the absence of clear equivalency across assurance programmes, and whether these factors influence producer perceptions of value, engagement, and programme effectiveness.

A key focus is the concept of transactional compliance and the implications this may have for the long-term integrity of assurance systems and their ability to support credible claims in international markets.

Due to the commercially sensitive nature of industry data, this research does not attempt to quantify outcomes directly. Instead, it takes a risk-based approach to assess how these pressures may influence behaviour and system credibility over time.

Research Objectives

The objectives of this research are to:

- understand how assurance programmes across sectors interact
- identify where overlap and duplication are occurring
- assess how this is contributing to compliance pressure at farm level
- examine how this pressure is influencing producer engagement and behaviour
- evaluate the potential risks to system credibility, market confidence, and supply chain integrity
- identify opportunities to reduce risk and strengthen the assurance system

Research Limitations

This research does not attempt to predict export failure, quantify direct market loss, or assess the legal validity of individual assurance systems. It does not include sensitive commercial information from any of the programmes within scope.

It also recognises that assurance programmes, regulatory systems, and market access frameworks operate differently across sectors and are not always directly comparable.

While the sample size is relatively small and not statistically representative of the horticulture sector, the patterns observed align with those identified in the literature review within papers such as the *Farm Assurance White Paper* (Castka et al., 2023), particularly in relation to duplication, audit fatigue, and declining confidence in the value of assurance programmes. Interviews within the horticulture sector also acknowledge increasing pressure within the system.

This indicates that the findings from this methodology are consistent with known system pressures, rather than being isolated to this report.

Literature Review: Drivers of System-Level Risk

Existing literature shows that New Zealand's export assurance system operates across both regulatory and market requirements. At the regulatory level, MPI

establishes the legislative framework for export certification, while importing countries determine the conditions that must be met for access to their markets. These requirements are reflected through Overseas Market Access Requirements (OMARs), which specify the conditions New Zealand exporters must meet to access individual export markets.

Delivery of this system relies on a partnership approach, where government oversight is supported by independent verification and industry implementation. As MPI states, "MPI manages the delivery of official assurances through authorising independent verification agencies" (MPI, 2018). This aligns with international analysis describing New Zealand as operating under "a regulator, a verifier, and an industry operator" model (World Bank Group, 2019).

Not all farm assurance programmes sit directly within OMARs or regulatory requirements. Instead, some operate alongside them as separate, commercial or market-driven systems that respond to customer expectations.

In dairy, assurance runs alongside regulation. As reflected in industry material, *"the information farmers provide is incredibly important. It helps to prove to customers, regulators, and the New Zealand public that farmers are operating in the best way they can,"* while also acknowledging that *"the demands from the industry are increasing"* and acknowledging that we don't want farmers *"bearing the brunt of this"* (NZ Farm Source, n.d.). Synlait reflects a similar approach, describing its programme as *"demonstrating industry leadership in food safety and sustainability, and guarantees the integrity, safety and quality of pure natural milk produced on certified dairy farms,"* allowing customers to differentiate supply (Synlait Milk Ltd., n.d.).

In red meat, assurance has been shaped primarily by customer expectations rather than regulation, with NZFAP functioning as a market-led industry programme, designed to provide independently verified evidence of on-farm practices. As outlined, *"NZFAP certification provides evidence to consumers worldwide that your products are trusted, safe, and traceable... [and] independently verified"* (NZ Farm Assurance Incorporated, n.d.). This aligns with industry feedback that *"the clear message coming from some of our highest value meat and dairy customers was the need for proof that production systems meet customer standards"* (Wallace, 2024).

In horticulture, NZGAP is used to show that production systems meet both regulatory and market requirements. NZGAP schemes *"provide assurance for the safe and sustainable production... of fruit and vegetables"* and show that *"management systems, procedures and practices are in place"* (Horticulture New Zealand [HortNZ], n.d.). NZGAP operates as an industry-managed programme using independent verification to demonstrate that growers meet these expectations (NZGAP, n.d.).

When looking at marketing and New Zealand's current position and reputation, literature shows that integrity attributes are essential to how New Zealand moves away from base commodity production. As indicated in the report titled, *Credence Attributes and New Zealand Country of Origin: A Review*, The Ministry for Primary Industries sets an ambition for New Zealand to be *"the most trusted source of high value natural products in the world,"* highlighting the role of trust in delivering value rather than volume (Dalziel et al., 2018). This is reinforced by the statement that *"New Zealand's prosperity depends on protecting our unique environment and way of life, and New Zealand's reputation for integrity - our products are what we say they are,"* linking reputation directly to economic outcomes (Dalziel et al., 2018). The paper also recognises the need for *"shifting the balance... from commodity to high-value products with high marginal return"* (Dalziel et al., 2018).

Across the sector, literature shows that these systems are becoming more complex. The 2025 KPMG Agribusiness Agenda notes that *“the view was expressed that it always feels like it is harder for farmers to do business in New Zealand than it is for farmers in other countries”* (KPMG, 2025). It also identifies that *“bureaucracy can make it hard for a farmer to optimise the use of their land...”* and that *“slow consenting processes and uncertain compliance processes create risk...”* (KPMG, 2025). While these issues do not relate directly to farm assurance programmes, they are relevant to the broader compliance environment within which farmers operate.

From a farmer perspective, these assurance requirements are often experienced as overlapping systems rather than a single process. Farmers report they *“spend too much time giving the same data to many different suppliers... Too much duplication and no one talks to each other”* (NZ Farm Source, n.d.), with several hours each week spent on compliance administration. While this reflects increasing demand for verified information, it also highlights the growing burden created by overlapping regulatory, processor, and market-driven requirements.

An article, *Enhancing Farm Assurance: A White Paper*, notes that farmers are increasingly questioning the value of assurance as *“the requirements are becoming increasingly complex and burdensome for organizations”* and that system integrity is weakened by *“audit fatigue”* (Castka et al., 2023). However, these concerns are not limited to compliance burden alone. The paper also states that *“farmers are... questioning the efficacy of assurance processes”* and are *“sceptical about the impact of these systems on farm management and the environment,”* indicating that the issue is not just the volume of requirements, but whether those requirements actually deliver meaningful outcomes.

The White Paper further identifies deeper structural weaknesses within assurance systems that reinforce this scepticism. It highlights that *“assurance systems’ integrity is compromised by several factors, such as audit fatigue, lack of adequate resources, conflicts of interest or doubt regarding the value of the assurance services,”* and notes that *“assurance systems’ integrity levels vary; some may be manipulated.”* This shifts the issue from being one of workload to one of system credibility. The emergence of mistrust is made explicit in the paper, which observes that *“cynicism toward assurance exists, which undermines farmers’ trust,”* suggesting that confidence in assurance is being eroded at a structural level rather than through isolated failures.

Research continues to show that overlapping regulatory and assurance requirements increase the workload on farmers and add to overall compliance pressure. The White Paper reflects this pattern, noting the growing demands associated with new regulations, multiple assurance schemes, and technology-driven monitoring. This creates duplication and additional administrative burden rather than streamlining compliance. These findings are consistent with international studies such as the *UK Farm Assurance Review*, which highlights that fragmented and layered assurance systems contribute to declining confidence, including *“distrust of assurance organisations and dissatisfaction with corporate influence”* and concerns around *“high compliance costs”* (Agriculture and Horticulture Development Board, 2024).

The paper illustrates how this issue manifests in practice, with audits described as *“time consuming and unnecessarily disruptive,”* and, in extreme cases, farms subjected to *“17 separate audits over a period of 20 months.”* This reflects broader concerns identified in the *White Paper* about the increasing impact on New Zealand farmers as assurance demands grow, where *“assurance systems’ integrity is compromised”* and we see *“cynicism toward assurance exists, undermining farmers’ trust”* (Castka et al., 2023).

Evidence of awareness of assurance programmes can be seen in literature such as *Understanding the Impact of Consumer-Oriented Assurance Schemes* (OECD, 2023), which references NZFAP as an example of how New Zealand's assurance systems are structured within agri-food sectors. While the report does not critique NZFAP or assess farmer uptake or outcomes, it concludes that assurance schemes often struggle to demonstrate clear impact, and that increasing costs, complexity, and audit burden without clear benefit place participation and credibility at risk.

The literature shows that New Zealand's assurance system operates as a combination of regulatory and market-driven components, providing verified evidence of on-farm practices and supporting market access, supply differentiation, and the country's integrity-based reputation. However, this same structure creates complexity at farm level, where overlapping frameworks and repeated information requirements contribute to increasing compliance pressure.

International Market Overview

As previously indicated, international food markets rely on trust-based systems supported by assurance frameworks; however, the value placed on assurance and verification differs across markets. This can broadly be understood across three tiers: commodity markets, market access requirements, and higher-value markets.

Commodity markets provide a baseline trading environment where products are largely sold on volume and price. Products cannot be told apart, processors have limited influence over pricing, and prices are mainly driven by supply and demand. In this context, assurance has limited impact on price. In higher-value markets, producers are able to differentiate their products and demonstrate value, as illustrated by the observation that “a farmer selling certified organic vegetables directly to urban consumers, or a producer of a geographically indicated (GI tagged) variety, can justify a premium over commodity prices because buyers perceive genuine value” (Agriculture Institute, n.d.).

Market access requirements sit above this baseline and are necessary to maintain entry into specific export channels. These requirements are often made up of regulatory standards, processor programmes, retailer expectations, or assurance frameworks required by importing countries or customers. While they do not always deliver a premium, they are critical to avoid exclusion from key markets. UK market access is governed by retailer and supply chain assurance requirements, where recognised and comparable international farm assurance schemes may be accepted as meeting expectations for food safety, traceability, and production standards (AHDB, 2024).

Premium markets sit above standard market access requirements and involve products or claims that attract additional value. These are supported by verified attributes such as grass-fed production or environmental performance. In these markets, confidence in assurance systems plays a direct role in maintaining both value and product integrity. This is reflected in emerging segments such as regenerative markets, where “premium markets consistently capture retail price premiums ranging from 15% to 50% above conventional commodity baselines, driven by third-party verification and strong consumer demand for ecosystem integrity” (Save.ag, n.d.).

Each tier plays a role, with commodity markets supporting volume, market access requirements enabling entry, and higher-value markets providing opportunities for additional returns. In practice, these tiers do not operate in isolation. Key export destinations often overlap, with products moving between

the three tiers and value and access dependent on the claims being made against them. This means the same production systems are required to meet multiple market expectations at the same time.

While all three tiers rely on New Zealand's regulatory credibility, assurance requirements play a critical role in how products are recognised and valued by customers, whether for basic market access or within premium market segments.

This becomes particularly relevant given that key export destinations also overlap, including China, the United States, the United Kingdom, and the European Union. This is consistent with Ministry for Primary Industries export data, which shows these markets are the key destinations for New Zealand primary sector exports (Figure 1)

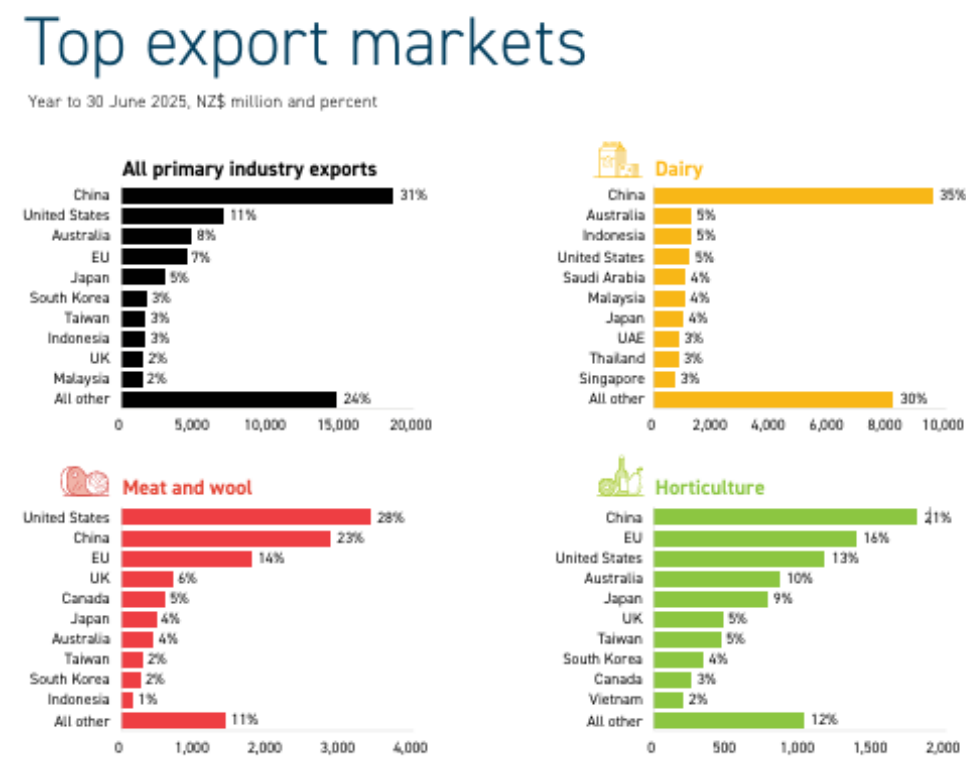


Figure 1. Top export markets for New Zealand primary industries. Source: Ministry for Primary Industries, 2025).

It is also important to note that different products, operating under different assurance programmes, are entering the same end markets and often the same retail and customer environments. This means that multiple assurance systems are effectively interacting within the same market context, reinforcing a perception of a single, connected system rather than separate programmes. A visual example of how export markets overlap across the primary sector is provided in Appendix 1a, which illustrates New Zealand's top 10 export destinations by product group (Ministry for Primary Industries, 2025).

This interaction also occurs within individual products. For example, in the red meat sector a single animal is rarely directed into one market alone, for instance, different cuts from the same animal are distributed across multiple markets, with higher-value cuts sold into premium markets such as the United Kingdom, while lower-value components are directed into markets such as China or manufacturing channels (Appendix 1B, Figure 1; SOPI, 2025).

Despite this, the assurance and verification requirements apply to the entire animal, not just the portion entering premium markets. To maintain access to higher value channels and support premium claims, the full system must meet the relevant standards.

A similar dynamic exists in other sectors. In dairy, milk from multiple farms is pooled and processed across a range of products destined for different markets, meaning assurance systems must operate consistently across the full supply base. [\(Appendix 1B, Figure 2; SOPI, 2025\).](#)

In horticulture, while products are typically less physically fragmented, diversified production systems and multiple market channels still require consistent verification across all crops and programmes linked to export markets. [\(Appendix 1B, Figure 3; SOPI, 2025\).](#)

Although assurance programmes differ by sector, a focus of this report is if they feed into a single international perception of New Zealand's production systems.

Structure of Assurance Systems

New Zealand's assurance environment is organised through sector-based programmes that, while technically separate, operate over the same supply chains and assess largely the same outcomes.

As farming systems have evolved, producers are increasingly supplying multiple markets at the same time, which means participating in more than one assurance programme. One farmer summed it up clearly: "FAP+ & GAP and also a SFF voluntary audit for food research within 6 months. It was too much providing of the same information" [\(Survey Respondent, Kellogg 2026\)](#)

In practice, assurance operates as a connected system, not a set of cleanly separated programmes. That creates real pressure at farm level and slightly different interpretations of the same requirements adding to administrative load. While repeated verification can lift confidence in New Zealand's production systems, it also increases the risk for the farmer that assurance becomes transactional rather than meaningful.

This interdependency already exists in practice. Many of the same records, controls, and verification steps are relied on across programmes, even though they are administered separately. The growth of dairy-beef systems highlights this, with animals moving between dairy and red meat supply chains. However, commercial claims are not currently recognised across sectors, meaning these cattle typically exit the dairy system and enter red meat as a commodity product.

Further overlap exists within the audit system, where independent providers such as QCONZ and AsureQuality operate across multiple assurance programmes. As a result, farmers can be audited multiple times, often by the same auditor, against essentially the same requirements.

Interaction of Overlap

It is important to acknowledge that while these programmes assess many of the same on-farm areas, it is not as simple as making them equivalent. Each programme assesses requirements through different frameworks and, in many cases, separate audits. As a result, overlap cannot simply be removed or standardised without consequence.

These consequences exist because each programme is already tied to specific market access conditions, customer requirements, and brand claims established in-market. Any change to one programme can have implications beyond the farm, influencing how products are positioned, verified, and ultimately accepted within customer environments and export markets.

This creates tension within the system. While on-farm practices are largely consistent, the way those practices are assessed and verified is not. As requirements within these programmes shift, tighten, or diverge, questions can

arise from producers around consistency, alignment, and credibility, particularly where similar outcomes are being verified through different methods.

At the same time, these differences are important and exist for a reason.

While duplication creates burden and risk at farm level, full consolidation or standardisation would remove the current separation between regulatory, market access, and commercial assurance systems. That separation is intentional and important, as not all parts of the system should be consolidated where they serve different functions in practice.

Attempts to fully consolidate or standardise the system would therefore risk removing this necessary separation and reducing flexibility across markets. Duplication is therefore not simply a system inefficiency; it is embedded in the way assurance frameworks interact with markets, customers, and regulatory expectations.

Table 2 is an attempt to capture the complexity of what is assessed during an assurance audit and to show where assurance systems overlap. This is not an agreed industry example of overlap, as no such example could be sourced. However, it does indicate where these systems integrate at the farm level.

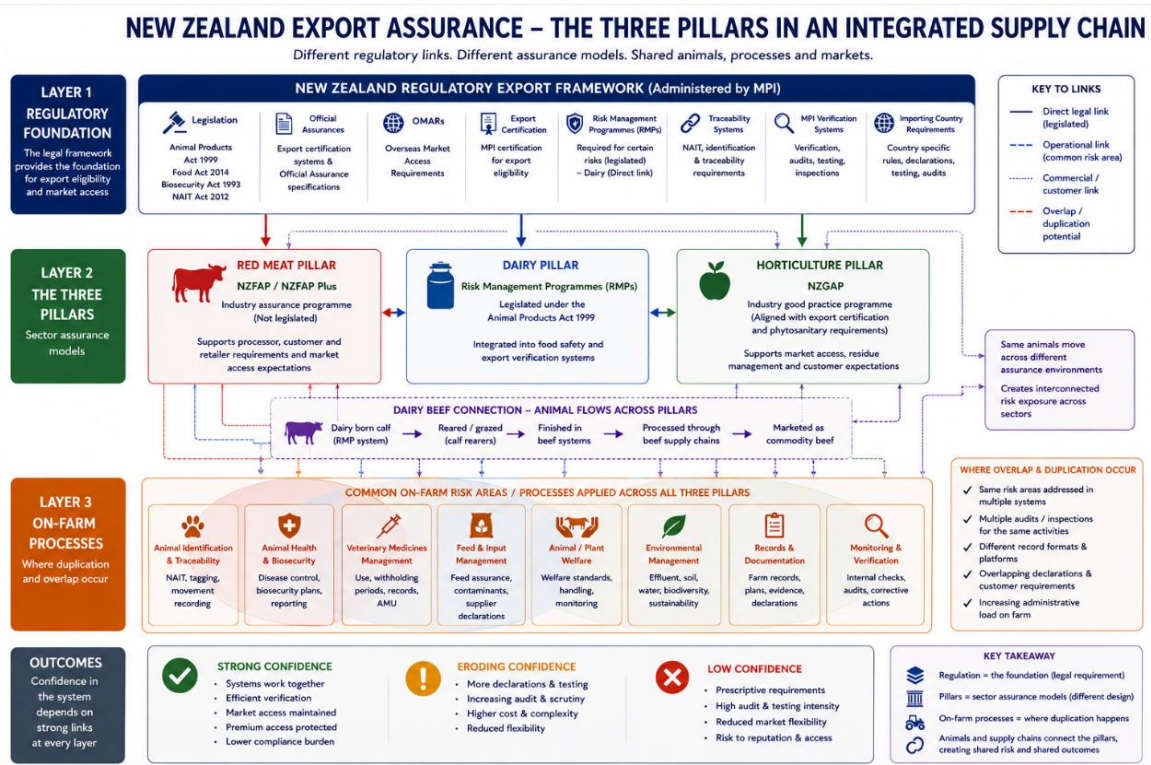


Table 2 an attempt to identify where the overlap may be appearing at the farm level as assurance programmes start to intersect.

Methodology and System-Level Risk Assessment

Having established that assurance operates as a connected yet often fragmented system, it is important to recognise that risk does not emerge evenly across the supply chain. In this report, it appears to surface first at farm level, where multiple programmes intersect and the impacts of duplication, audit pressure, and shifting requirements are most immediately experienced.

This research adopts a mixed-method approach, combining an anonymised farmer survey (n=53) with a series of semi-structured interviews conducted across the primary sector. The aim was to understand how assurance is experienced at farm level, and how it is interpreted across industry, regulatory, and market settings. The survey combined closed and open-ended questions. Closed questions were used to identify patterns and trends, while open-ended responses

provide supporting context and are included verbatim to reflect farmer perspectives, for the report these will be indicated as *Survey Respondent, Kellogg 2026*

Results are presented as percentages, as some questions allowed multiple responses, meaning totals may exceed 100%. Others required a single response. Findings reflect farmer perceptions at the time of response rather than measured workload or time. These findings are used to indicate directional trends rather than quantify industry-wide impact. Alignment with wider literature and industry interviews strengthens confidence in these observations, particularly in relation to potential increasing complexity, duplication, and audit fatigue.

Combined, the survey and interviews link on-farm experience with system-level perspectives, showing that pressures observed at farm level are also recognised across the wider supply chain and in market.

The survey sample included 53 respondents and was predominantly livestock focused. Sheep and Beef farmers represented 50% of respondents, Dairy 42%, and Mixed Livestock systems 19%, with some respondents operating across multiple categories (Figure 3). Horticulture represented 3% of the sample. This means the findings are most relevant to pastoral systems. While the sample size is small and horticulture is not statistically representative of the horticulture sector, it is sufficient to identify patterns, pressure points, and emerging risks (Figure 2).

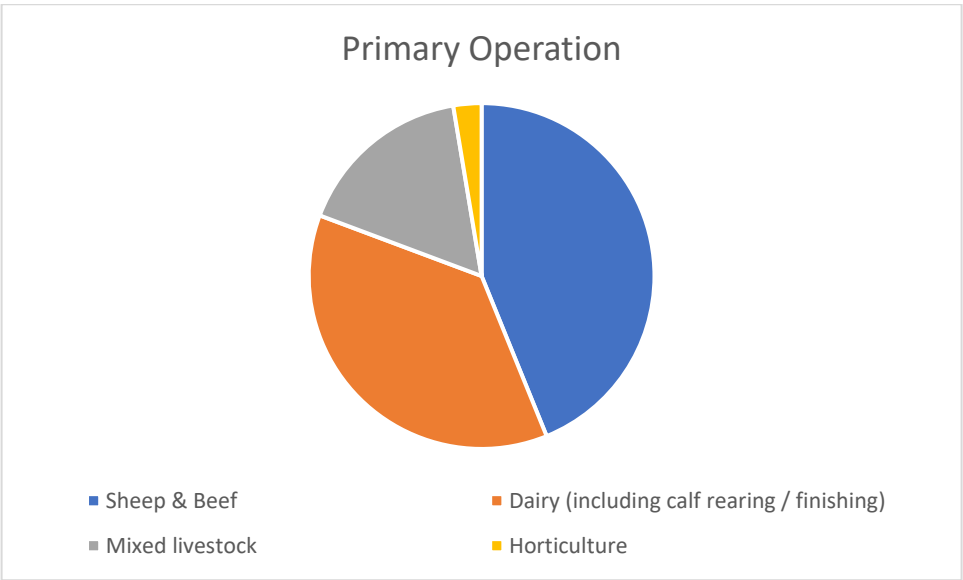


Figure 2

Figure 3 shows that responses related to workload indicate mounting pressure at farm level. When asked to describe how assurance requirements affect workload, 63% of respondents reported either increasing pressure (57%) or a significant burden (6%), while 29% described the workload as manageable or very manageable and 9% remained neutral. This result reflects the overall perception of respondents and provides a strong indication that assurance requirements are increasingly experienced as contributing additional strain to farm operations.

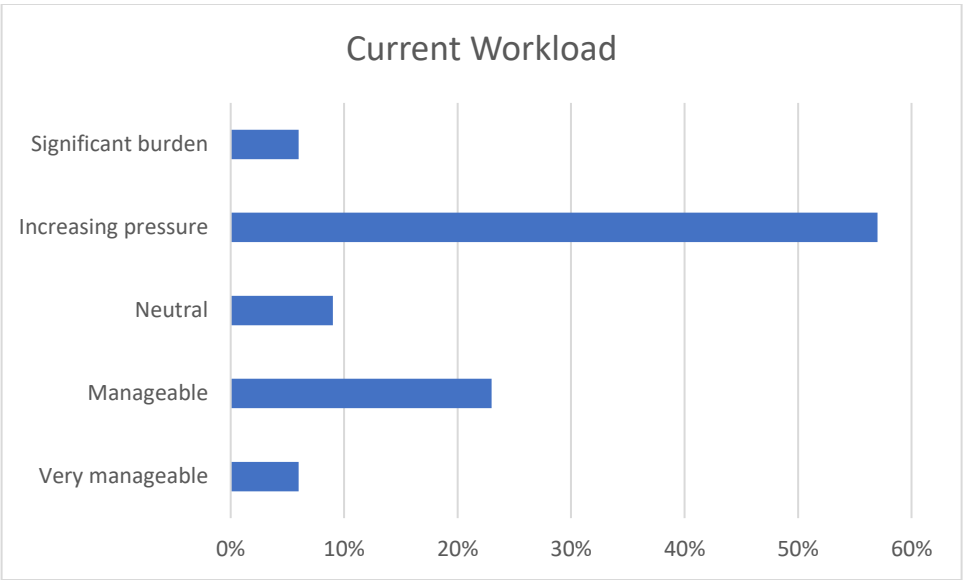


Figure 3

When respondents were asked to identify the most significant sources of pressure, record keeping and data entry requirements, along with duplication across multiple assurance programmes, were each cited by 66% of respondents. Audit requirements (43%), time competing with farm operations (40%), and regulatory requirements (34%) were also commonly identified (Figure 4). As this question allowed multiple responses, these results reflect the frequency with which each issue was selected rather than a ranked priority

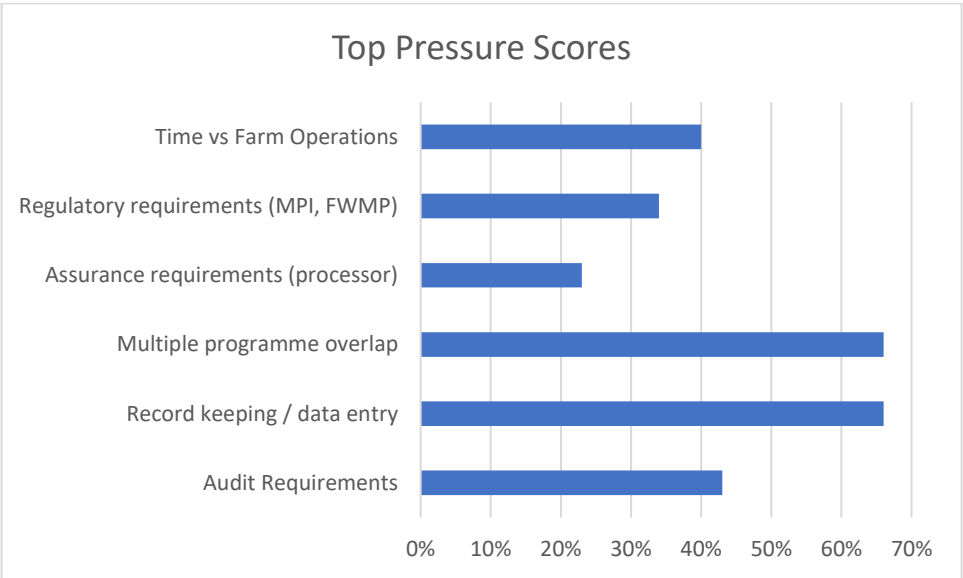


Figure 4

When asked how often assurance activities are experienced as a tick box exercise, 55% of respondents indicated this occurs often or always, 23% reported sometimes, and only 10% stated this was never the case (Figure 5). This question was structured as a single response, reflecting overall perception rather than frequency of specific activities. The result indicates that for most respondents, assurance is no longer consistently associated with meaningful practice improvement.

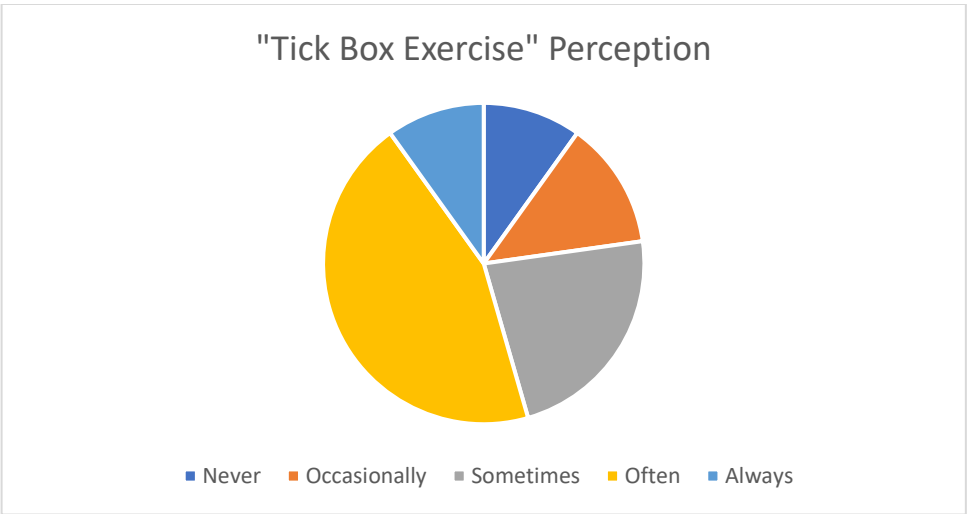


Figure 5

Figure 6 shows that when we focus on the impact of future engagement, respondents indicated that only 17% would remain fully engaged, while 43% would do only what is required to pass audits. A further 23% reported they would reduce effort, and 17% indicated that they are considering withdrawing from voluntary programmes. This question reflects intended behaviour rather than observed action but provides a strong indication of declining willingness to engage under increasing system demands (Figure 7).

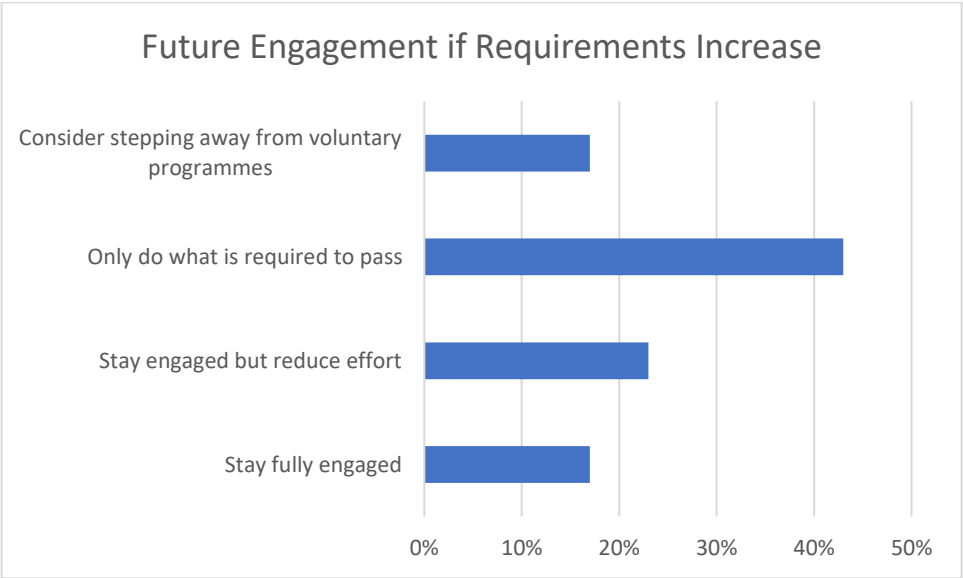


Figure 6

Altogether, these graphs provide a consistent picture of increasing pressure, duplication, and declining engagement at farm level, supporting the broader finding that assurance systems remain in place, but are increasingly experienced as transactional rather than value adding.

Key themes emerging from [Survey Respondent, Kellogg 2026](#) open-ended responses are summarised below:

Programme value and benefits: "I appreciate that the compliance helps us internationally meet our trading obligations."

Workload and time pressures: "My job is about 5 hours a week doing paperwork... It feels like everyone wants information, but no one is willing to pay for it."

Duplication and overlap: "This year we had FAP+ and GAP and also a SFF voluntary audit within six months. It was too much providing of the same information."

Tick-box culture: “It’s a tick box, no information is for the farmer, just say yes so they go away.”

System risks and concerns: “NZ’s integrity is at risk – a lot of poor practice happening right under our eyes.”

Future improvements: “Seeing actual impacts, i.e. a \$ return or greater market access.”

Beyond workload and duplication pressures, the survey highlights issues relating to clarity, confidence, and system understanding.

Supplier perceptions and their understanding of the difference between assurance and regulation is mixed. Over half of respondents (58%) reported seeing no difference between on-farm assurance audits and regulatory audits. This lack of distinction is reflected in open-ended responses, with one respondent noting, *“I am basically only aware of the importance of these for market access through my roles off farm as a farm consultant. The communication of that through to me as a farmer has been very limited”* Another stated, *“Lack of knowledge and understanding as to what the information is used for. People fill out because they HAVE to and it’s a process but don’t really see the benefits”*

Assurance programmes were not seen to reduce compliance workload. Sixty-three percent of respondents said they did not reduce regulatory compliance effort. Open-ended responses reinforce this, with participants reporting repeated submission of the same information, including statements such as, *“Giving the same information again and again,”* and *“Why can’t I just provide that once?”*

Confidence that records reflect on-farm practice is mixed. While 64% were confident or very confident, others reported gaps or low confidence. Several respondents directly questioned record integrity, stating, *“People who make up record to tick a box as opposed to recording what actually happens,”* and *“Records not matching practice e.g. ABF not being ABF”* Others described a shift away from physical verification, noting, *“Paperwork over practice when it comes to the actual audit,”* and *“Less of a physical audit and more of a paperwork audit”*

Clarity of requirements across programmes is inconsistent. Nearly half of respondents (49%) said requirements were sometimes unclear or confusing, as reflected in comments such as: *“There’s no single compliance standard, just a whole bunch of different ones, all evolving,”* and *“It’s becoming increasingly cloudy and app based, and I fear the technology is leaving me behind”*

Perceived value of assurance programmes remained mixed. While some respondents identified benefits related to market access, others struggled to connect requirements with outcomes. One respondent stated, *“I understand they enable increased market access for Fonterra and the NZ trade negotiators,”* while another commented, *“Farm assurance is not understood well by many”*

Several respondents explicitly identified system-level risk. One noted, *“NZ’s integrity is at risk – a lot of poor practice happening right under our eyes,”* while another warned, *“If farmers stop getting paid and instead it is a market access requirement... farmers will tick boxes, not follow through and once your offtake partner loses trust, you won’t get it back”*

These responses show that farmers aren’t just worried about the amount of work involved, they’re also unsure about why assurance is needed, whether the data being collected is reliable, and how any of it connects to market returns. Together, these concerns could indicate early signs that there are growing pressures at farm level.

As the survey was anonymised, respondents were able to provide candid feedback on their experiences. While response bias can influence survey results, the level of consistency across responses suggests that these perceptions are genuinely held rather than understated.

The industry interviews add additional context to the survey results and support many of the signals' farmers raised, while also showing that there is still strength and resilience in the system.

Eight, stakeholders were interviewed across red meat, dairy, horticulture, regulation, and commercial sectors, along with a senior trade representative, all of whom were selected due to their direct involvement in assurance, market access, and programme delivery. As part of the Kellogg requirement, each were provided consent forms allowing information to be captured by way of the interview.

Even though each person came from a different part of the sector, their views were surprisingly consistent. Most agreed that assurance programmes are valuable, well-established, and important for maintaining market access, customer trust, and New Zealand's reputation. They also felt the programmes themselves are generally working well. The bigger risk they saw wasn't programme failure; it was farmers slowly disengaging over time if the pressure keeps building.

Several common themes emerged throughout the interviews. These included the value assurance programmes provide to the sector, increasing market expectations, the growing burden of compliance and duplication, and the risk of assurance becoming transactional when participants no longer understand its purpose or value. There was also strong agreement that maintaining credibility requires continual improvement, particularly as international competitors and customer expectations continue to evolve.

Interview themes were not predetermined. They were identified through recurring patterns across responses, where similar issues were consistently raised by stakeholders from different parts of the sector. These were then grouped into key areas of alignment relating to programme value, market expectations, compliance pressure, and engagement. The intention was to reflect where views were shared across roles rather than isolate individual opinions.

The following sections summarise the key areas of alignment, connection and difference identified across the interviews.

All interview quotations are drawn from anonymised industry interviews conducted as part of this research and are identified by role (e.g. industry, trade, commercial) rather than individual attribution due to confidentiality.

Assurance Programmes Are Valued, but That Value Is Not Always Clear at Farm Level

Across all interviews, assurance programmes were consistently identified as valuable, particularly in supporting market access, customer expectations, and New Zealand's wider credibility. This value is not always visible. As noted in the commercial interview, "farm assurance [is] a little bit grey," sitting behind the product but relied upon as part of the integrity story.

From a trade perspective, assurance was described as "a critical enabler" of New Zealand's position, with systems expected to be "credible, measurable, and capable of withstanding independent review." While these systems are not always seen directly by customers or consumers, they underpin the claims that markets rely on.

This was reinforced across sectors. In dairy, customers were "brought to the table" through alignment with the programme, while in red meat, "markets

requiring data and proof through assurance programmes are critical." These programmes provide the mechanism for demonstrating standards rather than just claiming them.

From a red meat perspective, there was also a clear reminder of their purpose when tested. As noted, "if we don't have these standards what do we fall back on when we have a market access or customer issue." This highlights that assurance is not only about day-to-day compliance, but about having something credible to rely on when systems are challenged.

At the same time, this value is not always clear at farm level. Where it is not visible or reinforced, it becomes harder to link requirements with outcomes, particularly when market signals are indirect. This creates tension between system value in market and perceived value on farm.

Engagement Is Changing, with Signs of Complacency and Transactional Compliance

One of the most consistent themes was not system failure, but a shift in engagement. Assurance systems were described as functioning and well established, but increasingly reliant on continued reinforcement. As one industry representative noted, "the risk does not stem from system failure, but from a lack of ongoing advancement."

This was closely linked to a loss of clarity around purpose. In the red meat interview, "complacency is the word," particularly where farmers can no longer explain "why we're doing this." As purpose becomes less visible, so does ownership.

Engagement was also strongly influenced by incentives and industry signals. It was noted that farmers "take their behavioural cues from the companies they supply," meaning behaviour reflects pricing, enforcement, and expectations. Where these signals weaken, participation continues, but motivation declines. This was reinforced with the observation that farmers are receiving "the same price for doing nothing as they are for doing everything."

As a result, engagement shifts. Across the interviews, this was described consistently as "compliance becomes transactional," where requirements are met to pass audit, but without strong connection to on farm practice. The system remains in place, but engagement becomes more passive and less intentional over time.

Market Expectations Are Increasing and Require Ongoing Proof

Across all sectors, there was clear agreement that market expectations are increasing. As noted, in the horticulture interview "the market will ask more questions, not less," with growing demand for transparency, traceability, and verification.

From a trade perspective, this expectation is structured and ongoing. Trading partners are seeking a "time series" of evidence, focusing on how systems perform over time rather than relying on point in time certification. This reflects a shift toward continuous proof of performance.

These expectations are being shaped externally. The commercial interview highlighted that "the British retailers did all the heavy lifting," particularly through active engagement, auditing, and driving higher standards to enable supply into those markets. However, while the United Kingdom may be the most directly involved in how programmes like NZFAP are applied and tested, it does not mean other markets do not see value in these programmes. Instead, access into the UK is often used as a proxy, effectively acting as an "easy tick" for other customers.

This reinforces that assurance is doing more than meeting the requirements of a single market. It is being relied on more broadly to support New Zealand's position, including those that are not directly applying the same level of scrutiny. In practice, many customers expect these systems to already be in place and engage through documentation and supporting certifications rather than applying the same level of direct auditing.

Again, in horticulture, this is reflected in retailer driven requirements, where access can be restricted if specific frameworks are not recognised, even where equivalent systems exist. This reinforces that assurance is increasingly influenced by customer frameworks rather than regulation alone.

Together, these signals show that assurance programmes are expected not just to exist, but to provide consistent and credible evidence across time and across the supply chain.

Duplication and Repeated Data Requests Are Creating Pressure and Changing Behaviour

Although stakeholders generally supported the intent of assurance programmes, Duplication and administrative burden were consistently identified as pressure points across interviews.

Farmers were described in horticulture, red meat and industry interviews as giving feedback just as "giving the same information again and again," with the recurring question, "why can't I just provide that once." This was not due to a lack of data, but how it is managed, with the view that with increasing risk of compliance burden, the point that industry needs to address is "the data is already there, nobody wants to share it," highlighted that the fragmentation across the systems already exists.

This creates inefficiency and adds to workload. In some cases, on farm record keeping was described as now "effectively a full-time job," reinforcing the cumulative pressure created by multiple programmes operating across the same farm systems.

The impact of this pressure does not sit at workload alone. It was clearly identified that where requirements are repeated and poorly aligned, behaviour changes. The warning that "if you keep asking them to do it hundreds of times, they'll find shortcuts" highlights a direct response to duplication, rather than resistance to assurance itself.

This shift is not currently characterised by widespread non-conformance, instead, it reflects a move toward doing what is required to meet programme requirements, rather than engaging with their intent. As pressure increases and value remains unclear, attention shifts toward completing tasks efficiently, with less focus on accuracy, ownership, and consistency.

As this continues, engagement becomes more transactional. Participation remains, but the connection between on farm practice and what is recorded becomes less certain. This creates a weakening of the evidence base over time, not because the system has failed, but because how it is being engaged with has changed.

However, this experience is not consistent across sectors. In dairy, assurance was described as reducing duplication through alignment with existing systems, demonstrating that where integration occurs, some of these pressures can be managed.

Overall, this shows that duplication is not only creating pressure, but actively shaping behaviour. Where systems are not aligned and value is not clear, the

response is not withdrawal, but adaptation, and that adaptation sits at the centre of the risk identified in this report.

Assurance Contributes to New Zealand's Broader Integrity Profile

Assurance was consistently described as contributing to how New Zealand is assessed in market, operating alongside regulation but not always clearly separate from it.

From a horticulture perspective, this overlap is explicit. As noted, “your ability to go to market is incredibly limited” without programmes such as NZGAP, reinforcing that in some sectors assurance is directly tied to regulatory compliance and market entry requirements. This reflects the broader point that the boundary between assurance and regulation is not fixed but varies depending on how systems are applied in practice.

From a regulatory perspective, the baseline system was described as robust, with on farm verification findings limited to “bits and pieces” rather than systemic issues. This reinforces that the core system is functioning, with assurance sitting alongside it rather than replacing it. This was also clearly reflected in the industry interview, when reference to NZFAP it was noted that “market driven assurance does not operate in the same way as regulatory compliance and should not be treated as such.”

From a commercial perspective, assurance was described as part of how expectations are met, particularly where customers require visibility of production systems. This was particularly evident in horticulture, where a more visible “show us” expectation has emerged, with increasing pressure to demonstrate the environmental and sustainability of supply chains. In this context, assurance provides a structured way to respond to those expectations.

In the trade interview, this becomes more formalised. While assurance programmes are not explicitly written into free trade agreements, “the farm assurance piece does feed through” as part of the evidence used when New Zealand’s production systems are assessed. This sits within a “trust but verify” environment, where scrutiny extends “right down at the farm level” and trading partners expect a “time series” of evidence that demonstrates how systems perform over time, not just at the point of access.

The significance of this was made clear through discussions, the question was asked of trade, what could happen in market if we saw a widespread disengagement from assurance programmes such as NZFAP. It was described as the result would be “a catastrophe,” They indicated that the repercussions from a situation like producer disengagement would very likely result in a “very rapid response” expected from both the UK and EU, with questions raised through formal committee structures and potentially escalated further if New Zealand was unable to substantiate its claims.

This reinforces that while assurance may sit outside formal trade agreements, it is actively relied on in practice to defend those agreements, and the credibility of the evidence produced through these programmes remains critical to maintaining market access.

This aligns with the commercial perspective, where programmes such as NZFAP were described as a gateway to market access, with farms that chose not to participate finding that “their animals would no longer qualify” for certain supply chains, reinforcing that while assurance may not be formally required, it is required in practice to access and maintain these markets.

Across interviews, it was also clear that this is not assessed at an individual programme level. New Zealand is viewed as a single system, where expectations sit across sectors and supply chains. As raised in the trade interview, “if something

happened in the beef sector, that goes to reputation of the country," and "if it's happening here, what's the risk that it happens in the others?" reinforcing that assurance contributes collectively to how the country is perceived, rather than operating as isolated programmes.

This links directly back to earlier sections on engagement and pressure. Where duplication, workload, and unclear value are influencing how assurance is engaged with, the immediate impact may not be visible in regulatory performance, but it does affect the quality and consistency of the information supporting market claims.

Across interviews, the system itself was not described as failing. The risk sits in how it is maintained. Where participation continues but engagement weakens, the strength of the evidence used to support New Zealand's position becomes less certain over time.

The survey and interview findings align to show that while assurance systems remain in place, there are early signs that how they are being experienced and engaged with is beginning to shift. These patterns provide a basis for examining where pressure is emerging within the system and how this is influencing behaviour.

Findings

By focusing on how increasing overlap between assurance programmes impacts farmer engagement and system credibility, the findings indicate that assurance in New Zealand remains structurally strong, but pressure is emerging at farm level, where multiple programmes overlap and duplication, audit demands, and changing requirements are most visible.

Survey responses confirm that a change is occurring for farmers, with increasing workload, repeated requests for the same information, and a growing perception that assurance is becoming a "tick box" exercise rather than something that delivers meaningful outcomes. This aligns with interview insights, where the risk is not described as system failure, but as a shift in how the system is engaged with.

From an industry perspective, this shift is directly linked to how expectations and incentives are set across the supply chain. Market and customer requirements flow through processors, who translate these expectations into programme settings and signals that are then passed on to farmers. It has been noted that "primary responsibility for NZFAP system integrity sits with processors," with farmers "taking their behavioural cues from the companies they supply," reinforcing that engagement at farm level is shaped by the consistency of signals coming through processors rather than by programme design alone.

Beyond workload, the findings point to underlying issues of clarity and confidence. Farmers reported limited understanding of how assurance differs from regulation, how information is used, and how requirements connect to market outcomes. Confidence in record accuracy is mixed, and requirements are often described as unclear or inconsistent. Interview participants support this, noting that "compliance fatigue" is real, but often reflects inefficiency and poor system alignment rather than the intent of assurance itself.

Taken together and adding the survey findings, the results are indicating that engagement is weakening. There are trends showing increasing pressure (63%), growing reliance on tick box behaviour (55%), and declining willingness to remain fully engaged (17%) all of which, point to a system where participation continues, but the intent behind it is eroding. This reflects a shift toward more

transactional participation, creating a risk that the evidence base underpinning New Zealand's market claims becomes less reliable over time.

Importantly, while the sample size is limited, this does not reduce the significance of these findings. Instead, the consistency of responses suggests early-stage system pressure that may be underrepresented at scale and when considered alongside literature and industry interviews, still indicates that the risks identified are not isolated, but early signals of broader system pressure.

These patterns are consistent with wider literature on farm assurance and audit-based systems. [Castka et al. \(2023\)](#) identify growing complexity, duplication, and audit fatigue as defining challenges, particularly where programmes lack alignment, while [Henson and Humphrey \(2010\)](#) and [Bain et al. \(2021\)](#) highlight how overlapping requirements can drive more passive or transactional forms of engagement even where systems remain formally intact.

Overall, assurance programmes play a critical role in how New Zealand differentiates itself. They underpin the claims made in market and shape how the country is perceived internationally. However, their value is inseparable from what happens at farm level, where the product, the stock, and the farming system itself form the basis of all assurance claims. Farmers are not separate from these programmes; they are the foundation of them.

Assurance programmes provide the pathway for those on-farm attributes to be recognised, verified, and communicated in market, but without the underlying farm system there is nothing to assure. Equally, without assurance, the value of what is produced on farm cannot be fully recognised or captured in market.

This demonstrates that while the Dairy, Horticulture and Red Meat all operate at farm level within distinct sectors, they are underpinned by the same group of farmers producing the primary product. Although assurance programmes are assessed in isolation, they collectively shape New Zealand's reputation.

Implications

The below implications relate directly to how system overlap is influencing farmer behaviour and, in turn, the credibility of New Zealand's assurance framework.

This is not a loss of participation. It's a shift in how participation is happening, and what that means for the integrity of the system. As indicated in the findings, farmers are still in the system, but the way they are engaging with it is changing.

If behaviour continues to move toward getting through requirements rather than engaging with the purpose of assurance programmes, the way evidence is generated starts to change as well. The issue is no longer whether requirements are being met, but whether what is being recorded can still be relied on. Where engagement is driven by completion, records start to risk becoming disconnected from actual practice, more "paperwork over practice," with people "fill out because HAVE to... but don't really see the benefits" ([survey respondent, Kellogg, 2026](#))

Assurance programs are linked to market claims, and any weakening in how those records is maintained increases reliance on audit bodies to confirm credibility. This can further compound the pressures at the farm gate. At a farm level, loss of confidence sits within the system itself. Where assurance is no longer seen as meaningful, behaviour can shift even further. As noted in the red meat interview, if we lose trust with our producer base, "we risk having to go back to the start and then reinstate it."

At a market level, loss of confidence moves faster and carries wider consequence. The programmes may still operate, but what is at risk is the credibility of production, animal welfare, and environmental claims as well as

specific attribute claims in affluent customer environments. As stated in the industry interview, “reputational damage can be enormous,” and once confidence is lost, “you won’t get it back.”

From a trade perspective, the impact was also clear, with Trade stating that “reputation takes years to build and moments, minutes to be shredded.”

Again, this risk will not sit within individual programmes. As indicated in trade interviews, these assurance programmes are interlinked in how New Zealand is viewed. Loss of confidence in one area becomes a signal across the entire system.

That feeds directly into export and market access. Assurance underpins the evidence used to support those relationships, and once that evidence is questioned, the burden shifts immediately back onto the sector. Systems are no longer assumed to be credible; they are required to prove that they are.

At the same time, our export framework sits in a competitive environment. As noted, New Zealand must “keep running just to stand still,” reminding us that “the rest of the world may not actually want to give us access” and that the importance of our reputation within both markets and trade agreements isn’t just keeping what we currently have but being able to improve on it.

Where claims cannot be clearly demonstrated, the difference between New Zealand and other suppliers reduces, and product moves into the same “global commodity market,” losing the “stickiness” that comes from trusted, verifiable claims. While high demand is resulting in high returns currently, New Zealand’s risk is not that markets stop buying from us. It is that they no longer need to pay more for it.

This is reflected in commercial reality. Where assurance can no longer be relied on, “their animals would no longer qualify” ([commercial interview](#)) for certain supply chains. This is also evident in horticulture where changing market demands have already seen situations where producers “can’t export... because [their programme] is not GFSI recognised” The implication is not theoretical; it is a loss of position in markets or increased conditions placed on maintaining access.

Once confidence begins to shift, the responsibility moves back onto the sector to prove its claims under greater scrutiny. As indicated above, response would be immediate, but recovery is not. That will require time, cost, and alignment across the system, including re-engagement with the producer base.

Again, as indicated in the findings, this report does not indicate that this is occurring at scale. The farmer survey is small and reflects only a limited view of how the three sectors are interconnected, which in this case is positive.

The real risk therefore lies not in overstating the issue, but in failing to recognise these patterns early. Waiting until these behaviours are visible at scale would mean the shift toward minimal engagement is already embedded, more difficult to reverse and risks the integrity of the programmes and audit process itself being called into question.

Recommendations

Based on the work undertaken in this report, I am confident that overlapping assurance systems and regulatory frameworks are creating increasing pressure at farm level. This is supported by survey responses, industry interviews, and the literature.

While the survey is limited in scale and does not fully represent horticulture, the same patterns are evident across the wider report. This shows that the pressure is not confined to the survey but is being seen across the system.

The risk does not sit in overlap, duplication, or market exposure alone. It sits in failing to respond to the signals that have been identified. Complacency, in both programme design and industry response, carries its own risk.

If current pressures are not addressed, this shift in behaviour will become normal and only be recognised when credibility is tested externally. At that point, the issue is no longer system performance, but trust. Rebuilding trust is significantly harder than maintaining it.

The recommendations that follow set out what needs to happen next. They focus on how assurance systems are working in practice, where pressure is being created, and what is required to maintain engagement, data integrity, and system alignment before these risks are realised in market.

Aligned and clear industry position

Industry leadership and processors should clearly define where assurance programmes underpin market access and are therefore essential, while also distinguishing where participation is genuinely voluntary and when they are mandatory, ensuring this is communicated consistently to avoid mixed signals at farm level.

Primary responsibility sits with industry leadership and processors (e.g. DCANZ, HortNZ, NZFAI, and the processors operating within these systems) to ensure consistent messaging across companies. This must be supported by clear communication to suppliers and internal teams. Without alignment at this level, short-term commercial decisions risk undermining system-level credibility and weakening farmer engagement.

Assessment of assurance load at farm level

Industry bodies representing red meat, dairy, and horticulture should engage directly with farmers to understand how assurance requirements are experienced in practice at farm level. The purpose is to capture, from the source, how multiple programmes interact, where duplication occurs, and whether cumulative requirements are contributing to disengagement, shortcuts, or reduced confidence in the system.

This should be a coordinated, cross-sector effort led by organisations such as Beef + Lamb New Zealand, DairyNZ, and HortNZ, ensuring insights reflect real farm-level experience rather than programme design intent.

Where programmes involve commercially sensitive claims and cannot be openly compared, independent reviewers may be used to assess areas of overlap and pressure without requiring disclosure of proprietary information.

The outcome of this work should provide a clear, evidence-based view of how assurance systems are functioning in practice, and where changes are required to reduce unintended pressure and maintain system integrity.

Responsibility sits with industry bodies to lead this engagement, with support from processors and assurance programme owners. MPI should be involved where regulatory alignment is relevant but does not hold primary responsibility.

Improve Use and Sharing of Farm Level Data

Farm-level data is already being collected but could be used more effectively across programmes and the wider system to reduce duplication and improve efficiency. There are two key opportunities to streamline what is captured on farm and how it is used beyond the farm gate.

NOTE: Any data-sharing approach must minimise costs at the farm level and remain at the farmer's discretion, recognising that the data ultimately belongs to them. It should also integrate with existing on-farm data capture tools. Requiring farmers to duplicate

information across multiple systems for different purposes only compounds the very thing we are trying to solve.

1. **Define and formalise equivalency settings across assurance programmes**

Once overlap has been identified, equivalency should be considered and agreed where possible. However, full equivalency may not always be achievable due to commercially sensitive programme requirements or specific market claims. In these cases, the focus should shift to how farm-level data is used. A practical approach is to allow farm-level data to support multiple programmes where appropriate, rather than requiring the same information to be repeatedly captured. To enable this, there needs to be clear agreement across the system on what data can be shared as common evidence, and what must remain programme-specific to support claims.

Responsibility sits with assurance bodies and industry leadership to define and agree equivalency, with processors supporting alignment across supply requirements. Technology and data capture providers will need to support data-sharing solutions where appropriate

2. **Compliance and the wider regulatory framework.**

There is an opportunity to meet certain audit requirements at a regional level, reducing the impact on farm and the time spent on individual audits, particularly where data intersects across regions and is not farm specific.

Catchment groups and emerging technologies, including AI, offer the potential to streamline audit processes by enabling farm-level and regional data to be shared outward. Investment in effective data systems is likely to be more cost-effective than continuing to absorb the ongoing costs of non-conformance, increased audit time, and potential loss of integrity at market.

This opportunity should be explored further. Primary responsibility sits with MPI and regional authorities, supported by industry leadership and assurance bodies, to enable, support and operationalise these approaches.

Establish an early-warning mechanism for assurance erosion

Industry leadership, assurance programme owners, processors, and regulators should agree to establish a common set of indicators that signal when assurance engagement is starting to weaken. These may include changes in audit behaviour, evidence of “tick-box” compliance, declining participation, repeated and increasing non-conformance patterns and disengagement with programs.

Rather than requiring data to be shared between programmes, each organisation should be responsible for monitoring these indicators within their own systems and reporting on them through existing industry forums or governance groups.

Agreement is required on both the indicators themselves and what they signal, so that emerging patterns can be consistently recognised and acted on across the system.

The purpose of this is to identify early signs that assurance is becoming more about meeting requirements than improving practice, and to intervene before this affects trust at farm level or in the market.

In doing so, each part of the system contributes to maintaining the integrity of New Zealand's assurance framework and its reputation in international markets.

Conclusion

This report confirms that New Zealand's assurance systems remain credible and continues to support both market access and premium positioning. The system is not failing, and the regulatory foundation underpinning export access remains strong. Across dairy, red meat, and horticulture, assurance operates as three distinct pillars, but in practice they all originate from a single system. They sit across the same farms, the same audit structures, and the same export markets. They do not individually form an integrity profile; they collectively contribute to how New Zealand's production systems and products are perceived in market.

This report indicates that assurance programmes are no longer functioning purely as tools to support individual product or attribute claims. Intended or not, they have become embedded in New Zealand's broader integrity profile. They sit alongside regulation as part of the evidence used by customers and trading partners to assess whether what we claim can be trusted. This makes the distinction between regulation and assurance critical. Regulation maintains access. Assurance gives credibility to what is claimed within that access. New Zealand's position depends on both.

Yes, New Zealand is currently operating in a high-demand environment built on a reputation that has been earned over time.

Yes, the risk is not immediate loss of market access,

Yes, we do have a very strong regulatory framework that we can default to

What this report set out to assess was how increasing overlap across these pillars is influencing producer engagement, and what that means for the credibility of those claims both in market and on farm.

The findings are consistent. Survey responses, industry interviews, and supporting literature all point to the same pattern: the risk of complacency both on farm and in sector, increasing duplication, rising administrative load, and a growing shift toward transactional "tick-box" behaviour. While participation remains, engagement is changing.

The survey, while small, reflects these pressures clearly. The interviews reinforce that this is being seen across sectors and allowed for a horticulture voice that was not captured in the survey. The literature confirms it is not a unique or new topic, in fact discussions on compliance impact, duplication, audit fatigue has been present for years.

The significance of what the research in this report signals is not its scale. It is its timing.

This report shows where pressure is emerging before it is visible at system level or tested in market. This creates a window, to address duplication, restore clarity, and reinforce the value of assurance at farm level before engagement shifts further and begins to weaken the evidence that underpins New Zealand's claims.

If these patterns are allowed to embed, they will begin to shape the quality of that evidence long before any impact is visible. That impact could appear in two ways.

- At a farm level, a loss of trust erodes the system from within, weakening ownership, reducing accuracy, and breaking the connection between on farm practice and what is recorded. If this continues, farmers disengage and the integrity of the evidence base begins to fail.

- At a market level, the response is more immediate, increasing scrutiny, tightening requirements, and placing greater pressure on the evidence used to support claims until it is no longer trusted and the system must be rebuilt from the ground up. As industry makes clear, once that confidence is lost, you do not get it back.

If those two forces collide, internal erosion and external scrutiny, the system is no longer credible. At that point, trust is no longer reducing. It is gone. And by then, we won't be choosing to accept the risk, we'll be living with the consequences of having ignored it.

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Top 10 export destinations

Year to 30 June 2025, NZ\$ million



Product	Export revenue (NZ\$ million)	% of total
Dairy	27,151	45%
Meat and wool	12,360	20%
Horticulture	8,802	15%
Forestry	6,170	10%
Seafood	2,224	4%
Arable	338	1%
Processed food and other products	3,338	6%
Total	60,384	100%

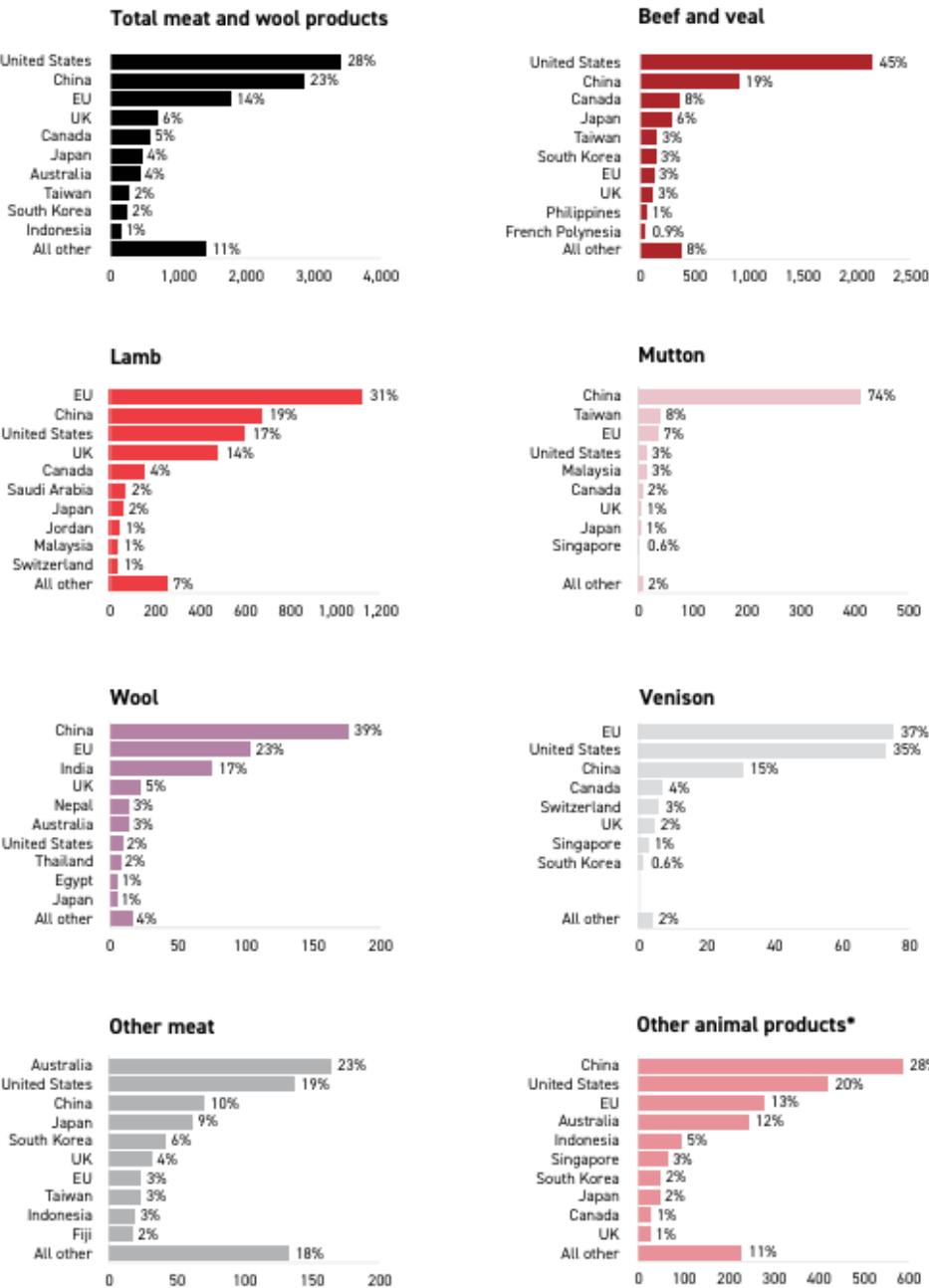
Appendix 1B

Graph 1: Red Meat Market Distribution

Source: Ministry for Primary Industries (2025), Situation and Outlook for Primary Industries, December.

Top meat and wool export markets

Year to 30 June 2025, NZ\$ million and percent

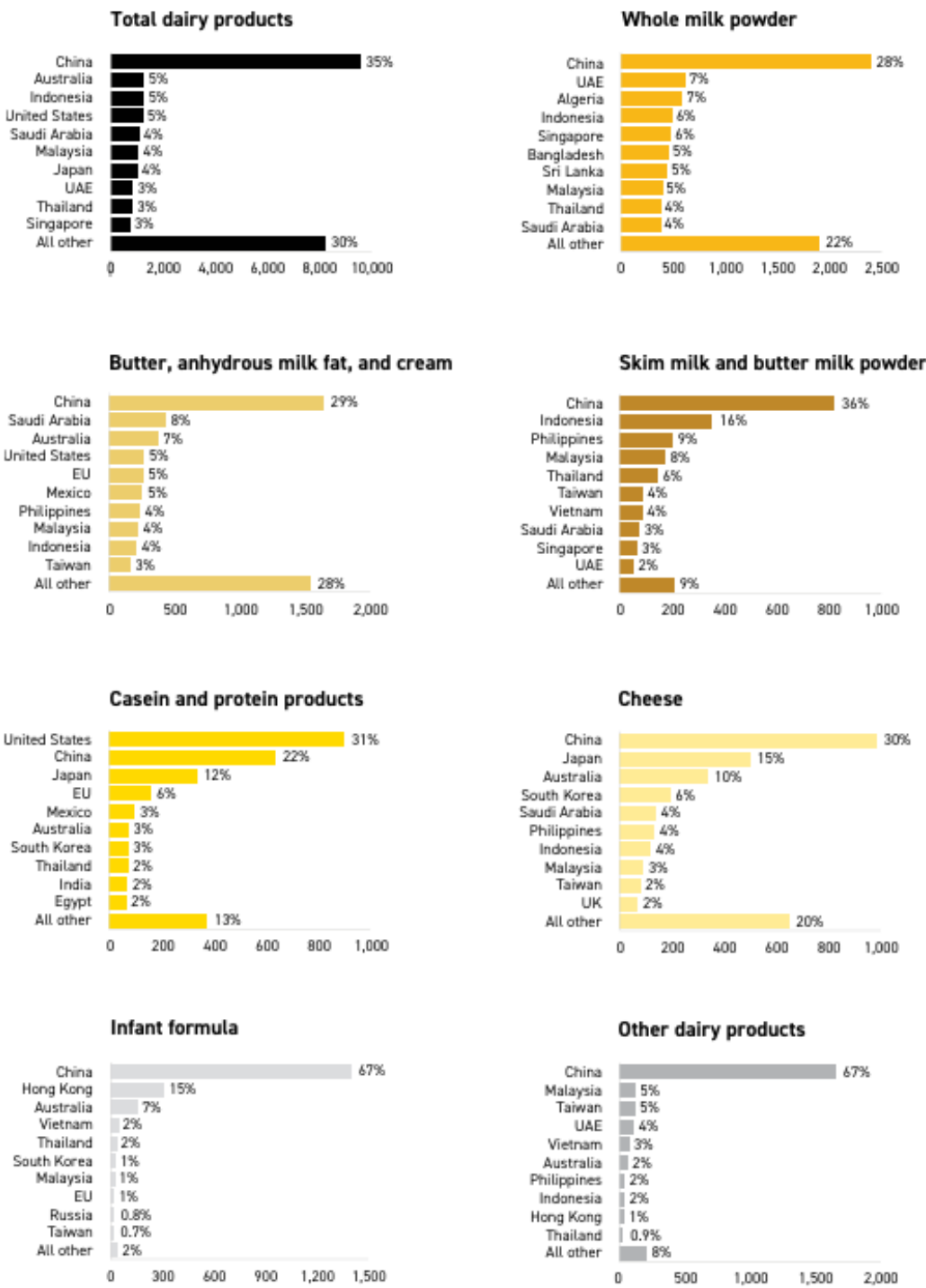


* Includes animal co-products, animal fats and oils, animal products for feed, carpets and other wool products, and hides, leather, and dressed skins.
Source: Stats NZ.

Graph 2: Dairy Market Distribution
Source: Ministry for Primary Industries (2025), Situation and Outlook for Primary Industries, December.

Top dairy export markets

Year to 30 June 2025, NZ\$ million and percent



Source: Stats NZ.

Graph 3: Horticulture Market Distribution
Source: Ministry for Primary Industries (2025), Situation and Outlook for Primary Industries, December.

Top horticulture export markets

Year to 30 June 2025, NZ\$ million and percent

