



Seed + Grain

Readiness & Response

Report title	Consultation Outcome Report – Proposed Levy Amendment
Prepared by	Seed and Grain Readiness and Response Incorporated (SGRR)
Prepared for	Minister for Biosecurity, Hon Andrew Hoggard
Consultation period	1 December 2025 – 2 March 2026
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1. Executive summary

This report summarises the results of sector consultation undertaken by Seed and Grain Readiness and Response Incorporated (SGRR) on a proposed amendment to the **Biosecurity (Response—Arable Crops Levy) Order 2023**.

The proposed amendment would expand the permitted use of levy funds to cover both biosecurity readiness and response activities. Levy rates, caps, and collection mechanisms would not change. The purpose is to align levy settings with SGRR's obligations under the Government Industry Agreement for Biosecurity Readiness and Response and to provide sustainable funding for preparedness work that reduces the likelihood and cost of future incursions.

Under clause 4(1), the levy is applied at the point of first transaction, which differs by crop type. For cereal, forage, turf, and non-forage seed, this occurs post-harvest when sold or assigned by the grower, including on-farm use. For maize seed, the first transaction occurs when seed is sold to the grower, so the levy is collected at purchase rather than harvest. As a result, two separate levies are collected under the Biosecurity (Response—Arable Crops Levy) Order 2023.

Consultation was open from 1 December 2025 to 2 March 2026. Stakeholders were notified through direct email, the SGRR website, member advertising via website notification and networks, industry newsletters, *Farmers Weekly*, meetings and workshops, a live webinar, and social media. Thirty-one responses were received, comprising of individual submissions alongside one formal letter of support from Federated Farmers; this represents approximately 1% of an estimated 2,500 potential levy payers across the arable sector, indicating a low level of direct participation for this voluntary consultation engagement, noting that non-respondents were still provided multiple opportunities to participate.

Results show clear majority support for the proposed amendment:

- 83% support enabling readiness funding within the Arable levy
- 75% support use of already-collected Arable funds for readiness
- 81% support enabling readiness funding within the Maize levy (among applicable respondents)
- 77% support use of already-collected Maize funds for readiness

Written feedback indicates that most levy payers consider readiness investment to be practical and preventative. Commonly cited benefits include earlier detection, reduced response costs, and improved sector resilience.

Support is conditional on strong governance. Respondents consistently requested:

- stable levy rates
- clear scope of eligible readiness activities
- careful cost control
- transparency and annual reporting
- safeguards to prevent inappropriate use of existing funds

Opposition was limited and primarily related to general concerns about levies rather than the specific proposal.

On balance, consultation demonstrates broad sector support and no significant resistance to the amendment. SGRR therefore recommends proceeding with an application to amend the Levy Order, supported by strengthened governance and reporting measures to address stakeholder concerns.

Key results at a glance			
Question	Support	Oppose	Effective n=
Arable readiness	83%	10%	29
Arable existing funds	75%	18%	28
Maize readiness	82%	11%	22
Maize existing funds	77%	14%	22

Table 1. Key results at a glance. The *n= value* reflects the effective number of relevant respondents for that question.

2. Purpose of the consultation

The purpose of this consultation was to seek feedback from levy payers and affected stakeholders on a proposed amendment to the Biosecurity (Response—Arable Crops Levy) Order 2023.

The amendment would extend the permitted use of levy funds to cover both readiness and response activities, rather than response activities only.

This change is intended to:

- align levy settings with SGRR's responsibilities under the Government Industry Agreement (GIA),
- provide sustainable funding for preparedness work, and
- reduce the likelihood, scale, and cost of future biosecurity responses through early detection and planning.

Consultation was undertaken to ensure levy payers were informed and given a reasonable opportunity to express their views, consistent with statutory requirements under the Biosecurity Act.

3. Background

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Seed & Grain Readiness and Response Incorporated (SGRR) is the GIA biosecurity entity for New Zealand's arable sector, established in 2020 by five industry groups (NZGSTA, UWG, FAR, Federated Farmers Arable, and NZ Flour Millers). It represents growers, processors and distributors in national biosecurity decision-making. As a signatory to the Government Industry Agreement for Biosecurity Readiness and Response, SGRR shares responsibility (and costs) with government for managing pest incursions and preparedness. Under the current Biosecurity (Response—Arable Crops Levy) Order 2023, only response activities are funded. The proposed levy amendment would formally permit arable levy funds to be used on readiness (surveillance, diagnostics, planning, workshops, etc.) in addition to response. This change would not alter the levy rate, cap, or collection mechanism – it only expands the permitted use of existing levy revenues. In summary, the consultation aims to align the arable sector's levy with its GIA commitments by funding critical preparedness work, without increasing the levy burden on growers.

4. Consultation methods

4.1 Timing

- Opened: 1 December 2025
- Closed: 2 March 2026

4.2 Engagement: SGRR used a multi-channel outreach strategy to notify all levy payers and stakeholders of the consultation:

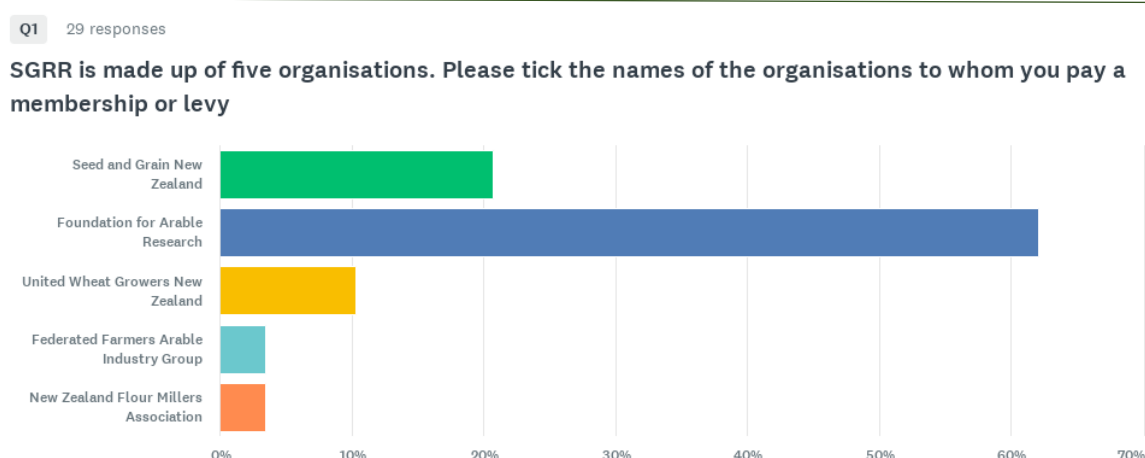
- **Email:** SGRR emailed registered levy payers and members directly, providing the consultation letter and details on how to submit feedback (via email, website, or online form).
- **Website:** The SGRR website published a consultation page summarising the proposal and linking to the online survey. This page outlined the rationale, proposed levy change, and readiness activities to be funded.
- **Industry Newsletters:** Notices were included in sector newsletters. For example, Foundation for Arable Research (FAR) and Seed & Grain NZ circulated briefings on SGRR's activities and the levy proposal in their bulletins.
- **Media Article:** An article in *Farmers Weekly* (Jan 21, 2026) highlighted the proposal and invited grower feedback.
- **Industry Networks (Word-of-Mouth):** SGRR board members and staff discussed the amendment in phone calls, during farm visits and at industry meetings/workshops.
- **Webinar:** A live webinar was held (Feb 9, 2026) to present the amendment and answer questions. The session (chaired by SGRR) explained the reasons for the change, its alignment with GIA, and how readiness funding would be used. The webinar recording was shared via SGRR's social media and member networks.
- **Social Media:** SGRR posted on its Facebook and LinkedIn pages about the consultation and deadline. For example, a LinkedIn post announced the webinar and noted the consultation extension to 2 March 2026. These posts summarised key points and reminded members to submit feedback.

Section 100ZB(6) of the Biosecurity Act that requires all proposed levy payers have been consulted and their views taken into account. Those levy payers being the first transaction growers, processors and distributors. SGRR's use of email, web, newsletters, media, and interactive sessions was consistent with MPI's advice that levy payers should have multiple opportunities to learn of and discuss the proposal.

5. Participation summary

31 responses have been received. Responses were received from levy payers across all member organisations and represent a cross-section of growers and first-transaction participants. There were 12 comments and one letter of support provided.

Table 1. Respondent membership/levy-paying organisation



6. Question-by-question results

Methodology: Survey data were collected via SurveyMonkey. Percentages are calculated using only respondents to whom each question was applicable. Responses marked "Not applicable" were excluded from percentage calculations. The reported *n*= therefore, reflects the effective number of relevant respondents for that question.

Q2 – Support updating the Arable Levy to include readiness (n=29)		
Response	Count	%
Yes	24	83
No	3	10
Not sure	2	7
Not applicable (do not grow arable crops)	2	N/A

Table 2. Responses to question two on supporting updating the Arable levy

Q3 – Use already-collected Arable funds for readiness (n=28)		
Response	Count	%
Yes	21	75
No	5	18
Not sure	2	7
Not applicable (do not grow arable crops)	2	N/A

Table 3. Responses to question three on using already-collected arable funds for readiness

Q4 – Support updating the Maize Levy to include readiness (n=22)		
Response	Count	%
Yes	18	82
No	2	9
Not sure	2	9
Not applicable (do not grow maize crops)	8	N/A

Table 4. Responses to question four on supporting updating the maize levy

Q5 – Use already-collected Maize funds for readiness (n=22)		
Response	Count	%
Yes	17	77
No	3	14
Not sure	2	9
Not applicable (do not grow arable crops)	8	N/A

Table 5. Responses to question five on using already-collected maize funds for readiness

7. Comments and Themes

Free-text feedback was welcomed in the survey and touched on several recurring themes:

Theme 1 – General support for readiness

Many respondents stated that prevention reduces future costs.

Examples:

“It seems sensible... steps that limit the likelihood and scale of a response.”

“Greater protection for our industry would be available from readiness work.”

This aligns with the high quantitative support observed in Q2 and Q3.

Theme 2 – Cost control and levy burden

Several respondents expressed concern about increasing financial pressure.

Examples:

“Would hope we don’t see a massive jump in levies.”

“We pay more than enough already.”

Implication: Stakeholders support readiness only if rates remain stable and spending is controlled.

Theme 3 – Governance and ‘mission creep’

Repeated concern that funds could be spent beyond the intended purpose.

Examples:

“A very clear and well-defined scope needs to be created to avoid mission creep.”

“Could this become a blank cheque?”

“Maintain scrutiny over effectiveness of spending.”

Implication:

Transparency and reporting will be critical to maintain trust.

Theme 4 – Information and communication

One respondent noted insufficient information to decide and requested a webinar.

This gap was partly addressed through the later webinar and recording.

Implication:

Future levy changes should include early education and detailed examples of planned expenditure.

Theme 5 – Minority opposition to levies in principle

A small number questioned the levy model itself.

Examples:

“A levy should only be collected once an incursion has occurred.”

“Importers should be fully responsible.”

These views represent a minority and do not align with the GIA cost-sharing framework.

8. Key trends (Final Results)

Final consultation results demonstrate clear and consistent support for extending levy funding to include readiness activities.

Support for updating the **Arable Biosecurity Levy** is strong.

83 % of respondents (24 of 29) support enabling readiness expenditure, with only 10 % opposed and 7 % unsure. This indicates a clear mandate from levy payers to broaden the purpose of the arable levy.

Support for allowing **already collected arable levy funds** to be used for readiness is slightly lower. 75 % (21 of 28) agree. Opposition remains limited (18 %). This shows that most levy payers accept that preparedness work should be funded immediately, rather than only from future collections.

82% of respondents (18 of 22) support updating the **Maize Biosecurity Levy**, with only 9 % opposed and 9 % unsure. A similar pattern is observed for use of **existing maize funds**, where 77% percent support the proposal. This indicates a clear mandate from levy payers to broaden the purpose of the maize levy and that preparedness work can be funded from existing funds, rather than future collections.

Written feedback confirms that most participants view readiness as a practical and preventative investment. Respondents commonly stated that surveillance, diagnostics, planning, and preparedness activities are likely to reduce the scale and cost of future responses. This is seen as consistent with the responsibilities of SGRR under the **Biosecurity Act 1993** and the Government Industry Agreement framework.

However, support is conditional. Several consistent concerns were raised:

- careful control of expenditure and avoidance of unnecessary cost growth
- clear limits on scope to prevent “mission creep”
- transparency on how readiness funds will be allocated and reported
- assurance that levy rates will not materially increase
- clarity on how previously collected funds may be used, and the need for levy payer consent where required

A small minority opposed the levy in principle, preferring a purely response-only funding model or greater government responsibility. These views were limited in number and are not representative of the overall response.

In summary, the final dataset indicates:

- strong support for including readiness in the arable levy
- majority support for the same approach in maize, where applicable
- broad recognition that prevention is more cost-effective than response
- clear expectation of strong governance and accountability controls

There is no evidence of significant sector resistance to the proposed amendment.

9. Formal Recommendation

Based on the consultation input, SGRR recommends proceeding with the levy amendment as proposed, with the following conditions and clarifications:

- **Scope of recommendation:** Proceed to amend the Order to permit readiness spending by the arable levy, as the majority of feedback supports broadening the levy to readiness activities. This aligns with SGRR’s GIA obligations and with industry sentiment. The existing levy rate, caps and collection methods would remain unchanged.

Governance safeguards: To address stakeholder concerns, the recommendation will include strong governance measures. SGRR would commit to rigorous accountability—such as annual reporting on readiness expenditures and an oversight framework—to ensure funds are used as intended. In particular, SGRR will note that *no* funds will be spent contrary to levy-payer consent: if any respondent did not agree to repurpose existing funds, SGRR will segregate those levy shares for response only. A maximum of 82.6% of existing Arable levy funds could be used for readiness, and a maximum of 79% of existing Maize levy funds could be used for maize readiness.

10. Conclusion

Consultation demonstrates broad sector support for amending the levy to include readiness activities. Respondents recognise the benefits of preventative investment and support alignment with SGRR's obligations under the Government Industry Agreement, subject to appropriate governance and transparency controls.

Accordingly, **Seed and Grain Readiness and Response Incorporated** recommends proceeding with amending the **Biosecurity (Response—Arable Crops Levy) Order 2023** to permit readiness expenditure alongside response activities.

Sincerely



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Chair, Seed and Grain Readiness and Response Inc.

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