



APICULTURE
NEW ZEALAND

SUBMISSION

TO: New Zealand Food Safety
FROM: Apiculture New Zealand
SUBMISSION ON: Proposed Animal Products Notice: New Zealand Animal Products Standards
DATE: 9 September 2021

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Submission to New Zealand Food Safety: Proposed Animal Products Notice: New Zealand Animal Products Standards

Introduction

Apiculture New Zealand (ApiNZ) welcomes the opportunity to make this submission to New Zealand Food Safety on the Proposed Animal Products Notice: New Zealand Animal Products Standards (the proposed Notice).

ApiNZ is the national body representing the apiculture industry in New Zealand representing the full range of sectors in the industry, from hobbyist and commercial beekeepers to honey exporters and suppliers. ApiNZ aims to support and deliver benefit to the New Zealand apiculture industry by creating a positive industry profile, business environment and opportunities for members. ApiNZ was established in 2016 after a restructure of the National Beekeepers Association of New Zealand (NBA) to better meet the needs of its members.

New Zealand Food Safety have asked for input on the proposed Notice. The proposed Notice is a consolidation of 17 current documents comprising 11 Notices and 6 additional documents.

The proposed Notice applies to producers, suppliers and processors of animal products such as dairy, fish, poultry, meat and honey, and people who transport and store these products. It is also relevant to verifiers and evaluators of these businesses, and any associated accreditation bodies.

New Zealand Food Safety would like feedback on the proposed Notice, in particular if, it is easy to navigate. For example, if:

- it's easier to find the requirements that apply to your industry
- requirements are easy to understand (for example, if the requirements are clear and not ambiguous)
- there is anything you think should not be there, or anything we have missed.

ApiNZ feedback on proposed changes

ApiNZ's submission only applies to the bee products sector. Overall, ApiNZ agrees with the changes in the proposed Notice.

Feedback on specific clauses in the proposed Notice

1. Chapter	2. Part	3. Clause	4. Comment	5. Proposed amendment
1	2	1	No definition of a beekeeper is included in the list of definitions	Use the definition of a beekeeper used in the 'Biosecurity (National American Foulbrood Pest Management Plan) Order 1998'. The definition of a beekeeper in this notice is 'a person that owns beehives'.

Feedback on the questions in the feedback form

Questions NZFS would like feedback on		
1.	Do you agree that it is easy to find the information that is relevant to your sector in the new notice? Why/why not? What could be improved?	The changes to the proposed Notice may not make it easier in the beginning as the bee products industry is used to looking for industry specific notices, instead of looking in several different notices. However, the proposed Notice will make it easier for the application side of verification because everything is standardised.
2	Do you agree that technical requirements are more visible and explicit? Why/why not? What could be improved?	Yes
3	Are there any significant changes that we have made and have not identified?	No
4	Do you agree that the requirements that have been harmonised are fit-for-purpose for your industry sector? Why/why not?	As there have been no major changes for the bee products sector, the proposed Notice is still fit for purpose. Including representatives from the bee products sector in workshops during the development of the proposed Notice ensured that the revisions would not have any adverse effects on the bee products sector.

Questions NZFS would like feedback on

5	Do you agree that the requirements reflect existing practices? Why/why not? If not, which requirements does not do that?	Yes, we agree that the requirements reflect existing practices.
6	Are there general requirements that are not in the general section but should be?	No
7	Do you agree that the specific requirements are appropriate to your industry sector? Why/why not?	Yes, we agree that the requirements are appropriate for the apiculture industry.
8	Are there further improvements that could be made to the Notice? If what are your suggestions?	We think it would also be useful to add a definition of 'beekeeper' to the definitions in Part 1.2(1) of the proposed Notice. See the comments on this issue in the previous table for more details.
9	Do you think that these changes will have an impact on your RMP or business?	No, the changes will not have an impact on RMPs for companies in the apiculture sector.
10	Did you review this notice alongside the proposed regulations?	Yes
11	In place of standard numbering, we have implemented a section referencing system to assist in navigating the document (MRP, RMP, DFD) – is this helpful? Or would you want to move back to standard numbering?	Moving to section referencing instead of standard numbering is a move away from what most other standards (including voluntary) and pieces of legislation currently use. Section referencing is unlikely to cause any problems for companies in the apiculture sector.