



# APICULTURE

## NEW ZEALAND

# SUBMISSION

**TO:** Ministry for Primary Industries (New Zealand Food Safety)

**FROM:** Apiculture New Zealand

**SUBMISSION ON:** Review of the Animal Products Notice: General Export Requirements for Bee Products

**DATE:** 24 September 2021

**Via email:** [Food.Assurance@mpi.govt.nz](mailto:Food.Assurance@mpi.govt.nz)

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# Submission to New Zealand Food Safety Review of the Animal Products Notice: General Export Requirements for Bee Products

## Introduction

Apiculture New Zealand (ApiNZ) welcomes the opportunity to make this submission on the Review of the Animal Products Notice: General Export Requirements for Bee Products (the GREX 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.

In May 2021, MPI carried out a public review seeking feedback on current requirements in the GREX related to consignments of bee products weighing less than or equal to 2 kilograms where an official assurance is not required. There were no changes to requirements when this review was initiated. As a result of this review, MPI are consulting on further changes to the GREX requirements.

MPI are proposing the following changes to the GREX requirements because of feedback provided in the previous round of consultation on the GREX requirements:

- The proposed changes to requirements under Part 4.5 of the GREX are a result of feedback provided in this review. MPI are proposing that the gross weight limit is increased from 2 kilograms to 12 kilograms for consignments that are exported without official assurance via postal pathways.
- Proposed changes to test method information under Part 6.3 of the GREX were not part of the review. MPI are proposing that the current requirements are extended to include business to business export samples for laboratory testing purposes.
- Minor structural changes have also been made in the GREX for ease of understanding requirements.

## ApiNZ feedback on the proposed changes

ApiNZ appreciates the opportunity to provide input into the Review of the Animal Products Notice: General Export Requirements for Bee Products in relation to consignments of bee products weighing 2 kilograms where an official assurance is not required. We appreciate MPI considering our feedback in our previous submission on this topic dated 27 May 2021 and proposing to increase the minimum limit to 12 kilograms including packaging. Overall, ApiNZ supports the proposed changes. Our feedback on the four questions in the discussion paper follows.

Item	MPI question	Comments
1	Do you agree with the proposed change of increasing the weight limit from 2 kilograms to 12 kilograms? Please provide reasons and data to support comments.	We agree with the proposal to increase the weight limit from 2 kilograms to 12 kilograms. This will make a significant difference to our members and their ability to send honey to their customers and samples to potential importers.  However, we would like to reiterate our feedback from previous submissions that the amendments still do not allow small honey companies that are not registered as exporters to

		<p>sell individual jars of honey from their websites to overseas customers, or for members of the public to be able to send honey as gifts to friends and family.</p> <p>We understand that, under the Animal Products Act, all exporters are required to be registered with MPI. This requires registration for the exporting of honey or any animal products overseas no matter what the purpose. People exporting honey, whether companies or private individuals, are all treated the same. We understand MPI is reviewing this policy as part of several changes to the Animal Products Act. We ask MPI that this review is given urgency to allow the required policy change to be implemented swiftly.</p>
<b>2</b>	<p>Do you agree with the proposed change of extending requirements to include business-to-business samples for laboratory testing purposes? Please provide reasons and data to support comments.</p>	<p>Extending the requirements to include business-to-business samples for laboratory testing purposes is too restrictive. While laboratory testing is probably the most common reason for sending business samples, it is not the only reason for sending them. Business samples also get sent for other reasons such as for tasting, visual samples, and marketing examples. The requirements should be extended to include business samples for any reason.</p>
<b>3</b>	<p>Do you agree with the proposed change of transitioning current test method information from the Consolidated List of Tests to the GREX? Please provide reasons and data to support comments.</p>	<p>We agree with this proposal as it is in line with changes to other animal products notices.</p>
<b>4</b>	<p>Do you agree with the proposed updates to the Guidance Document: Guidance to the Animal Products Notice: General Export Requirements for Bee Products, to reflect the changes in the GREX? Please provide reasons and data to support comments.</p>	<p>Yes, while we agree with updating the guidance document to reflect the changes to the GREX proposed in the consultation documents, additional updates will also be required once the issues in this submission have been considered.</p>