



APICULTURE

NEW ZEALAND

SUBMISSION

TO: Ministry for Primary Industries
FROM: Apiculture New Zealand
SUBMISSION ON: Review of the Animal Products Notice: General Export Requirements for Bee Products
DATE: 27 May 2021
Via email: Food.Assurance@mpi.govt.nz

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Introduction

1. 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.
2. Apiculture New Zealand is the national body representing all sectors of the apiculture industry in New Zealand. 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.

Background

3. 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.
4. It is clear from ApiNZ member feedback that the current 2kg limit is overly restrictive and needs to be re-looked at, particularly given the COVID-19 environment which effectively limits the opportunity for sales via traditional networks.
5. The ability to send products to customers in an affordable way, through the domestic and international Post network is critical for our industry, many of whom are facing considerable economic pressures.

Feedback on proposed changes

6. Section 4.5.2: When a transfer document is required

7. Some ApiNZ members have requested more clarity around transfer documentation. There still seems to be confusion in the market as to what is needed. For example, more clarity is requested in relation to e-commerce documentation with members wanting to know if the intent or expectation is that transfer documents will be required on all e-commerce to countries requiring Official Assurances. This includes MPI giving industry plenty of notice with any changes that may occur, for example any updates in relation to Certificates of Analysis (COA) or whether Test Results are required on e-commerce going forward. Examples include recent changes introduced in relation to AFB testing and glyphosate residue testing requirements.
8. ApiNZ members have also requested that the Export of Small Honey Packages - Frequently asked Questions issued Sept 2019 <https://www.mpi.govt.nz/dmsdocument/38678/direct> are more regularly updated in relation to changes to those countries that require Official Assurances (see also point 17).

9. Section 4.5.3: When a transfer document is not required

10. The general view is that the current requirements are working well, i.e that those parcels that do not require transfer documentation are clearly labelled with the batch numbers and exporter ID on the outside of the package.
11. However, we would reiterate our comment from our previous Submission dated 17 July where we said:
“The amendment does not allow small honey companies (non-registered exporters, without an exporter ID) to sell individual jars of honey from their websites, or to send as individuals (i.e., non-commercial) to friends and family members overseas. It is understood 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, whether to friends/family or commercial, they are all treated the same. This is clearly impractical and unwieldy, and we understand MPI is reviewing this policy as part of a number of 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.”

12. Key challenge for industry is the 2kg limit.

13. The biggest issue facing our members is the 2kg limit per parcel (total weight including packaging). This has been found to be impractical and inefficient, noting that as it currently stands, 2kg parcels limit consumer options to between 1.5 - 1.7kg of honey/bee products if the outer packaging (boxing, care wrap) is taken as part of the weight.
14. Members advise that 5kg to 7kg is a more realistic weight. As an example, 6kg is a carton of 12x500g poly jars (with packaging added etc.) Additionally, for smaller operators some overseas buyers will want a carton as they order it once a year.
15. For a number of our members, the packaging is an important feature of the honeys they sell, for example, using custom-made cartons are an important part of the brand and marketing efforts but also heavier in weight. In addition, and in response to growing consumer demand, honey producers are also using glass jars which also adds to the weight. For example, a 250g net weight glass jar of honey in a special display pack will weigh up to 2.3kg, then require additional packaging to ensure safe, damage-free delivery overseas. One member has advised that without significant secondary packaging (when trying to minimise the weight to fit the 2kg limit), they have had expensive product write-off when damage occurred during transit.
16. While volumes for members will vary depending on the size of operations, it is not uncommon for a small to medium operator to send around 100 to 200kg overseas, via small parcels. This trade has become particularly important with COVID-19 closing borders and preventing tourism door sales. As one of our members has advised “In times of COVID-19 when posting is the only way to get product to customers who would otherwise buy in New Zealand – this is a pretty important lifeline for the honey trade.”
17. In addition, it is noted that some markets do not limit imports to 2kgs and in fact accept much higher quantities, for example, Saudia Arabia. We believe there should be more flexibility in relation to limits for these markets as it relates to overseas regulations. MPI could allow for different limits through normal OMAR notices that are market specific.

Apiculture New Zealand would be happy to provide any further details in relation to its submission outlined in this document.