



APICULTURE

NEW ZEALAND

SUBMISSION

TO: FSANZ

FROM: Apiculture New Zealand

SUBMISSION ON: Public Consultation- Scoping Paper on the Review of the Food Standards Australia New Zealand Act 1991

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Introduction

1. Apiculture New Zealand (ApiNZ) welcomes the opportunity to make this submission on the Amendments to 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. Earlier this year, ApiNZ made representations to the Ministry for Primary Industries on behalf of a number of members who were advised by New Zealand Post that it had decided to no longer allow small parcels of honey and bee products to be sent overseas through its retail network.
4. The NZ Post decision also came at a time when many beekeepers were facing considerable economic pressures, including the pressures of operating in a Covid-19 environment. The ability to send products to customers in an affordable way, through the domestic and international Post network is critical for our industry.
5. This is particularly important for those beekeepers in rural communities, where there are no readily available alternative means of posting parcels.
6. Apiculture New Zealand held urgent discussions with both New Zealand Post and MPI to try to resolve the issue. While recognising the need for some checks in place to manage traceability and retain the credibility of our exports, any requirements should be practical and cost effective.
7. On behalf of our members we are pleased that the Ministry welcomed our involvement to help resolve the immediate issues, listened to our feedback, and mobilised their team to fix this with the proposed Amendments to the GREX.

Feedback on proposed changes

8. ApiNZ is supportive of the distinction in the GREX with the intention of reducing the traceability requirements for parcels of less than or equal to 2kg. This supports registered exporters by removing the need for costly and time-sensitive documentation requirements.

9. On behalf of our members, we do however make the following points, and suggest further refinement and/or clarification is required on the proposed changes:

3.1 Limited to parcels less than or equal to 2kg

The amendment should be clearer on weight. At present the wording is 2kg parcels but could be better defined as 'parcels containing a net weight of 2kg or less of bee products'. This is a realistic weight minimum for retail sales or export product sample requirements. As it stands, 2kg parcels will 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.

3.3 Parcels only addressed to a private individual

MPI's assumption in *b) that "business to business exports are likely to be larger consignments and the current requirements of the GREX are appropriate and do not need amendment"* needs to be challenged and should be amended to reflect current legitimate activity regarding honey samples.

Honey exporters frequently send honey samples of less than 2kg via International Courier Post (NZ Post). These samples are sent to an importing company (not individuals) for analysis prior to export. To date, no export certificate has been required, only the Exporter ID on the paperwork accompanying the parcel for traceability, this has been monitored successfully by NZ Post.

We urge MPI to reword this section to reflect the posting of export honey samples as part of our international trade requirements.

3.4 Additional labelling of parcels

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 (ie 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.

3.4 (3) & (4) Labelling the parcel with **the source transfer document number or eligibility document number.**

This approach may work well for a small beekeeper that packs honey from a single source. But, it must also consider the small beekeeper who may produce and process their own product and therefore have had no need to generate a source transfer or an eligibility document number. In this instance, the beekeepers' unique Harvest Declaration number could provide a reference for traceability and food safety assurance for the particular batch or batches of honey relating to the product being shipped.

Also, this section does not consider the fact that most exporters will have batches from multiple sources. We recommend that where exporters have batches from multiple sources the parcels are labelled and have the batch numbers outlined on the parcel. That way traceability requirements under the GREX are still met and MPI retains the ability to do further checks by requesting the source information for those batches from the exporting company.

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