



APICULTURE

NEW ZEALAND

SUBMISSION

TO: Ministry of Primary Industries
FROM: Apiculture New Zealand
SUBMISSION ON: Submission on MPI draft labelling guidance for agricultural chemicals
DATE: 13 September 2019

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The following submission is presented by Apiculture New Zealand on behalf of its Science and Research Focus Group. Members of the **Apiculture New Zealand Science and Research Focus Group** include:

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1. Apiculture New Zealand represents the interests of beekeepers and honey bees in New Zealand. Beekeeping is now one of New Zealand's fastest growing export enterprises and presently supplying the world with very high value honey products.
2. The apiculture industry in New Zealand has contributed to the major growth of New Zealand's primary produce exports. MPI's own summary data published in the Situation and Outlook for Primary Industries (SOPI) June 2019 showed a substantial jump in honey exports to \$348 million year ended June 2018. This is significant growth for a single specialty food product, with \$100 million more than the arable sector. Significantly MPI is forecasting more growth for honey exports in the 2019 year and beyond.
3. Beekeepers are also actively engaged in supporting the horticulture industry (kiwifruit, avocados, pip fruit etc.) and arable specialty seeds industry with pollination services. These industries are also important exporters. Beekeepers contribution to New Zealand export trade in primary products is significant. It is therefore very important that New Zealand protects this resource by ensuring the safety and health of the honey bees.
4. Apiculture New Zealand would like to contribute to this document to ensure safe pesticide use in New Zealand. Pesticide kills of bees have been of significant concern to beekeepers for many years and it is an ever-present risk. In response to this risk, AGCARM and Apiculture NZ have collaborated and drawn up the 'Bee Responsible' programme. Detailed here:
<http://agcarm.co.nz/wp-content/uploads/Bee-Tri-Fold-Brochure-web.pdf>
5. Apiculture NZ would like to see all agricultural chemical labels have a pollinator safety statement outlining the basics of preventing harm to pollinating bees. A draft statement is shown here:

Warning – Protect Pollinators from harm

- a. Never treat crops in flower
 - b. Check nearby for foraging bees on flowering weeds and eliminate weeds by mowing or tillage.
 - c. Never apply pesticides during daylight hours where bees are foraging.
 - d. Contact hive owners before spraying, including those on adjacent properties.
 - e. When using spray tank mixtures with other pesticides; fertilisers and spray tank adjuvants such as surfactants and penetrants, check with you supplier on the bee safety of the mixture before spraying.
6. We wish to advise MPI that the residue statement proposed in Paragraph 5.13.1 is incomplete as it does not mention maximum permissible levels regulated under the Animal Products Act 1999. It appears MPI has omitted the MPLs requirement of the Animal Products Act 1999. In particular 08/035 Contaminant Requirements for Bee Products for Export. Clause 2.1 "The maximum permissible level (MPL) for agricultural compounds and veterinary medicines in bee products for export is 0.01mg/kg, unless otherwise specified in

sub clause 2.2.” <https://www.foodsafety.govt.nz/industry/exporting/market-access/other/08-035.htm>

7. Beekeepers have very little control over what their honey bees gather from plants treated with agricultural chemicals. For example; we cannot yet state how glyphosate is being collected in New Zealand honey. Therefore, it is important for the label to communicate this risk to the user of the agricultural chemical. It must clearly state that applying a product can cause honey to exceed the default MPL.
8. Thank you for considering our submission. We are prepared to take part in any public meeting on the submissions made to MPI on the labelling of Agricultural Chemicals.