



29 September 2022

Export Systems Policy
Regulatory Systems directorate
Ministry for Primary Industries
PO Box 2526
Wellington 6140
via email: exportlegislation@mpi.govt.nz

To whom it may concern,

Re: Submission on Modernising export assurance systems - legislative options

Thank you for the opportunity to submit on the proposal to modernise New Zealand's export assurance systems.

Apiculture NZ (ApiNZ) is the national body representing the apiculture industry in New Zealand covering the full range of sectors, from hobbyist and commercial beekeepers to honey exporters, packers and suppliers. ApiNZ aims to support and deliver benefits to the New Zealand apiculture industry by supporting a thriving long-term future for New Zealand honeybee products and services, including having a strong bee health and biosecurity position.

ApiNZ supports, in principle, the idea of new export legislation that could regulate the export of all food and other primary sector products, beyond those sectors that are currently regulated (animal products and wine) if required to facilitate trade. We agree that it is important to have a regulatory system that provides a solid base for accessing overseas markets, growing New Zealand's exports sector, and responding to changes in the global trading environment.

We agree that the impact of any changes on the apiculture sector are expected to be low due to this sector currently falling under the Animal Products Act. Due to the lack of details in the consultation document, we have assumed that any requirements the apiculture sector would face under Legislative Option One will be similar to those the industry already faces under the Animal Products Act. We have assumed that the sector would face additional costs under Legislative Options Two and Three.

While Apiculture New Zealand currently has a preference for Legislative Option One, we would not support Legislative Option One if it resulted in additional costs for the apiculture sector. It is difficult to comment on the potential effects of the other legislative options on the apiculture sector without additional details.

Our support for legislative option one is also contingent on further consultation with more details about how the three legislative options would be implemented and how they would affect the apiculture sector being undertaken before presenting any options to Government.



APICULTURE NEW ZEALAND

We also support current legislative systems that are working well being incorporated into any new regimes rather than being recreated from first principles. Similarly, we support recognising private standards as meeting audit requirements to avoid duplication as we understand that Australia is taking this approach.

Yours sincerely

Karin Kos
Chief Executive
Apiculture New Zealand