



21 April 2023

Annual Review: Proposed 2023 Changes to MPI's Cost Recovery
Ministry for Primary Industries
PO Box 2526
Wellington 6104
via email: costrecovery@mpi.govt.nz

To whom it may concern,

Re: Submission on the Annual Review: Proposed 2023 changes to MPI's cost recovery.

Thank you for the opportunity to submit on the Annual Review: Proposed 2023 changes to MPI's cost recovery.

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.

The discussion document proposes increasing the agricultural compounds and veterinary services (ACVM) levy, increasing the charges for verification services at establishment, and making seven design changes to ensure appropriate charging for services that are provided.

The consultation document states that a deficit has accumulated for both the ACVM levy and establishment charges as the fees have not been changed since 2015. ApiNZ is concerned that once again MPI is proposing large fee increases to recover deficits that they have been carrying for several years due to infrequent fee reviews. As we have previously mentioned in our 2022 submission on MPI's consultation document called 'Proposed changes to cost recovery in MPI's food system', we support reviewing fees more frequently in the future to reduce the opportunity for large deficits to accumulate.

ApiNZ members are facing ongoing cost increases within their businesses, while operating within a challenging market environment that has seen honey prices fall for several seasons. With this in mind, we urge Government to be cognisant of the environment and challenges faced by producers and that MPI's cost recovery efforts are carefully considered, fair and transparent.

Yours sincerely

Karin Kos
Chief Executive
Apiculture New Zealand