



APICULTURE
NEW ZEALAND

9 June 2023

Official Assurance Specifications for Animal Material and Animal Products
Ministry for Primary Industries
PO Box 2526
Wellington 6104
via email: Food.Assurance@mpi.govt.nz

To whom it may concern,

Re: Submission on Official Assurance Specifications for Animal Material and Animal Products.

Thank you for the opportunity to submit on the Official Assurance Specifications for Animal Material and Animal Products (OAS AMAP).

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 amalgamating the Official Assurances Specifications for Animal Material and Animal Products (non-dairy OAS) and the Official Assurances Specifications for Dairy Material and Dairy Products (Dairy OAS) to create a single Animal Products Notice that provides the updated requirements for official assurances across all sectors.

This involved comparing, and where possible, aligning the requirements between the different sectors and Notice. We support the alignment of the requirements between the two notices as we understand that, over time, the two notices had become inconsistent with one another, out of date compared to current practice, and difficult to understand and interpret.

The consultation document also proposes relocating clause 7.3: Eligibility requirements – Unlabelled retail packs and bulk honey, and clause 7.4: Eligibility requirements – Listing of beekeepers from the non-dairy OAS to the General Export Requirements for Bee Products Notice (Honey GREX). We support this proposal as these requirements safeguard assurances and it is more appropriate for them to be in the Honey GREX than in the non-dairy OAS.

Yours sincerely

Karin Kos
Chief Executive
Apiculture New Zealand