

19 June 2023

Proposed National Organics Standard
Ministry for Primary Industries
PO Box 2526
Wellington 6104
via email: organicsconsultation@mpi.govt.nz

To whom it may concern,

Re: Submission on the Proposed National Organics Standard

Thank you for the opportunity to submit on the Proposed National Organics Standard (the Standard). 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.

While we broadly support the proposed standard, we do have comments on the provisions in the proposed standard. Appendix One contains proposed changes and comments on specific clauses in the Standard. Additional points are covered below.

Certification mark

The proposed Standard is currently silent on how consumers would be able to identify products that comply with the new national MPI Organics Standard. There are currently two agencies recognised by MPI for the official organic assurance program: AsureQuality and BioGro New Zealand Ltd. Both these agencies have organic logos that producers who comply with their standards can display on the packaging of compliant products. These logos make it easier for consumers to identify whether products comply with the Standard. ApiNZ supports the development one national organic logo that compliant producers can display on certified packaging and promotional material.

Equivalence with international standards

The proposed Standard will apply to organic food produced in New Zealand. As organic honey achieves a premium price in many overseas markets, it is important that honey that meets New Zealand's organic standard is also able to comply with and achieve equivalent recognition against existing international organic standards.

ApiNZ supports priority being given to negotiating equivalence with organic standards that are active in international markets. This priority should focus on New Zealand's main organic markets administered by the USDA organic standards, the EU organic legislation and the Canadian Organic Regime (COR).

Costs of the proposed national organic standard

It is important to appreciate that there is a balance between cost and reward, therefore consideration must be given to maintaining realistic certification programme costs and ongoing audit and certification expense. Costs for certification for the national organic standard should be referenced against the current certification providers who have established fees and certification programs in operation nationally.

Monitoring, audit and reporting

Any certification programme requires a robust audit and reporting programme to add credibility and integrity to the certified product and the supplier. It will be a requirement to deliver the outcomes required both within New Zealand and internationally. Monitoring must include domestic supply, processing and product outturn. It will also be necessary to verify the integrity of the international buyer, their processes and any added value activity that is supported by a NZ national organic standard.

Supplementary feeding

ApiNZ is the management agency for the National American Foulbrood Pest Management Plan (the plan). The primary objective of the plan is to eliminate American Foulbrood disease (AFB) from managed beehives in New Zealand.

While we understand the need for supplementary feeding where the survival of bees is endangered, or in emergency situations, section 7.1.6 of the Standard specifically promotes feeding organic honey to bees. This is because the option of feeding organic honey is mentioned before the option of feeding organic sucrose or pollen substitutes. We would prefer that the order is swapped, and that the option of feeding organic sucrose and pollen is mentioned first, instead of second, in the Standard. Communications about spreading AFB advise that it is risky to feed honey to bees due to the risk of spreading AFB.

Given the heightened need to ensure the integrity and reputation of the proposed National Organics Standard we ask that the Ministry considers that extracted organic honey should only be permitted to be fed to bees if it has first been tested for the presence of AFB spores and returned negative test results.

This will retain integrity critical to an organic product like honey and also provide the National American Foulbrood Management agency with additional confidence in minimising the impact of AFB. We are happy to answer questions about any of the points raised in this submission.

Yours sincerely



Karin Kos
Chief Executive

Appendix One: Proposed changes and comments on specific clauses in the proposed national organic standard.

Version in consultation document	Proposed changes in red	Comments
<p>7.1.1 General Principles Beekeeping is an important activity that contributes to the protection of the environment and plays a crucial role in agricultural, food and forestry production through the pollination action of bees. The treatment and management of hives should respect the principles of organic production.</p>	<p>Beekeeping is an important activity that contributes to the protection of the environment and plays a crucial role in agricultural and food and forestry production through the pollination and nectar gathering activities of bees. The treatment and management of hives should respect the principles of organic production.</p>	<p>Bees offer little to the forestry industry unless mānuka plantations are considered to be forestry.</p>
<p>7.1.2 Prohibitions Clipping the wings of queen bees, is prohibited. The use of synthetic repellents is prohibited. Combs containing brood must not be used for honey extraction and honeycomb production. The extraction of honey from brood chambers where sugar feeding has been used is prohibited.</p>	<p>Clipping the wings of queen bees, is prohibited. The use of synthetic repellents is prohibited. Combs containing brood must not be extracted as part of the honey harvest and must not be used in comb honey production. The extraction of honey from brood chambers is prohibited, as is the extraction of frames exposed to sugar feeding.</p>	<p>Brood combs should never be extracted as the risk of external influences (chemical residues etc) being bought into the hive is too high.</p>
<p>7.1.3 Origin of bees Choice of strain must take into account the capacity of the bees to adapt to local conditions, their vitality and their resistance to disease. Apiaries must be constituted by means of the division of colonies or the acquisition of swarms or hives from units complying with the requirements of this Standard. For the renewal of the organic hives, up to 10% per year of the hives may be replaced by hives not complying</p>	<p>For the renewal of the organic hives, up to 10% per year of the hives may be replaced by hives not complying with this Standard, subject to the conversion standdown period.</p>	

<p>with this Standard, subject to the conversion period. An organic apiary may be re-established with non-organic bees. The operator must be able to demonstrate the following:</p> <ul style="list-style-type: none"> a. high mortality of bees was caused by health or adverse events; and b. it is necessary to allow organic production to continue or recommence; and c. organic bees are not commercially available; and d. it is limited to an agreed number of hives and period of time. 		
<p>7.1.4 Conversion To be organic, hives must be managed in compliance with this Standard for at least 12 months. During the conversion period, where no prohibited products have been previously used in the hive, replacement of wax is not necessary. Otherwise, wax must be replaced with organic wax. When organic wax is not commercially available, non-organic wax may be accepted for use. This wax must be free of contamination and come only from the cap.</p>	<p>When organic wax is not commercially available from a certified supply source, non-organic wax may be accepted for use. This wax must be free of contamination and come only from the cap.</p>	<p>It is not clear what the term ‘not commercially available’ means.</p> <p>While organic wax is usually available, quantities are limited, and it is normally several times more expensive than non-organic wax. It is noted that price should not be able to be used as a reason to use non-organic wax.</p> <p>The EU prohibits the use of non-organic beeswax in organic beehives – refer to Articles 13 and 38 of the EU Regulations.</p>
<p>7.1.5 Split and parallel production Operators may run organic and non-organic hives in the same production unit for the purpose of pollination and honey activities provided that:</p>	<p>Records must include the following:</p> <ul style="list-style-type: none"> a. number of organic and non-organic hives; b. location of organic and non-organic hives; 	<p>7.1.5 parts a-e specify that records must be kept for organic hives. Record keeping requirements should apply to all hives, regardless of whether they are organic or non-organic if a split or parallel operation is being run.</p>

<p>1. Organic and non-organic honey hives must be easily and obviously distinguishable.</p> <p>2. Operations must keep records of how parallel production is being managed as specified in supplementary notice.</p> <p>Records must include the following:</p> <ul style="list-style-type: none"> a. number of non-organic hives; b. location of non-organic hives; c. identification and segregation of non-organic hives, honey and other bee products at all stages of production; d. storage facilities for non-organic products; e. procedures for ensuring segregation of organic products and non-organic products; f. procedures for clean-down of any equipment used for both organic and nonorganic processes; and g. a plan for converting the non-organic part of the production unit. 	<ul style="list-style-type: none"> c. identification and segregation of organic and non-organic hives, honey and other bee products at all stages of production; d. storage facilities for organic and non-organic products; e. procedures for ensuring segregation of organic products and non-organic products; f. procedures for clean-down of any equipment used for both organic and non-organic processes; and g. a plan for converting the non-organic part of the production unit. 	<p>Section 3.9 of the Standard permits split and parallel operations and sets out the requirements that must be met to maintain the integrity of the organic products from that operation. It allows parts of properties to be converted, and/or properties to be converted progressively.</p> <p>It is inconsistent with section 3.9 to require all beekeeping operations to have a plan to convert to being fully organic when this is not a requirement for other sectors. Beekeepers should be able to operate as their apiary sites determine.</p>
<p>7.1.6 Nutrition and feed</p> <p>Collection areas must be large enough to provide adequate and sufficient nutrition and access to water. At the end of a production season, sufficient reserves of honey and pollen must be left in the hives for the dormant, non-productive season as winter feed. Supplementary feeding may only be carried out</p>	<p>Where the survival of the hives is endangered or in emergency situations (e.g., extreme climatic conditions) supplementary feeding may occur using organic sucrose or pollen substitutes. If organic sucrose or pollen substitutes are not available, extracted organic honey or pollen may be used.</p>	<p>We understand the need for supplementary honey to be able to be fed to bees where their survival is endangered or in emergency situations. However, honey and pollen are high risk items for the spread of AFB (Goodwin 2018)¹.</p>

¹ Goodwin, M (2018) 'Elimination of American Foulbrood disease without the use of drugs: A practical manual for beekeepers'.

<p>between the last honey harvest (after honey supers have been removed), until the start of the next nectar or honeydew flow period and before the honey supers are placed into the hive. Where the survival of the hives is endangered or in emergency situations (e.g., extreme climatic conditions) supplementary feeding may occur using organic honey or pollen. If organic honey or pollen is not available; organic sucrose and pollen substitutes may be used.</p> <p>If supplementary feeding is to be carried out the operator must notify the Recognised Entity and provide the following: a. Justification that supplementary feeding is necessary to ensure the survival of the hives; b. If organic sucrose and pollen substitutes are to be used, evidence to demonstrate that organic honey or pollen is not available. Records of all supplementary feeding products must be kept as specified in supplementary notice.</p>	<p style="color: red;">Add: c. If extracted organic honey is to be used, only organic honey that has been tested for American Foulbrood (AFB) may be used. Samples for testing should be taken from batches not exceeding 1.5 tonnes.</p>	<p>We propose that organic sucrose or pollen substitutes should be the first option for emergency feeding and that organic honey or pollen should be the second option.</p> <p>We propose that extracted organic honey should only be permitted to be fed to honeybees if it has first been tested for the presence of AFB spores and returned negative test results.</p> <p>We are satisfied that these changes in the standard will be sufficient to mitigate the risk of spreading AFB as a consequence of supplementary feeding practices.</p>
<p>7.1.7 Husbandry management practices The replacement of the queen bees involving the killing of the old queen is allowed. The practice of destroying the male brood is allowed only to contain an infestation with Varroa destructor. Bees can be removed from hives by using physical or mechanical methods or smoker,</p>		

<p>using fuel from plant materials that have not been treated with inputs not acceptable in this Standard. Smoker fuel must not be a source of contamination or jeopardise the organic integrity of the apiary products and not cause harm to the bees.</p>		
<p>7.1.8 Health Management: Prevention Disease prevention and treatment is based on the application of practices encouraging resistance to disease and the prevention of infections, such as:</p> <ul style="list-style-type: none"> a. Regular renewal of queen bees; b. Systematic inspection of hives to detect any health anomalies; c. Control of male brood in the hives; d. Cleaning and sanitising of materials and equipment at regular intervals with material and practices allowed under this Standard; e. Destruction of contaminated material or sources; f. Regular renewal of beeswax; and g. Sufficient reserves of pollen and honey in hives. 	<p>f. Regular renewal of beeswax replacement of brood frames with one season's clean frames (combs) taken from the honey collection supers.</p>	
<p>7.1.9 Health Management: Treatment Despite any of the listed preventative measures used, if the hives become sick or infested, they must be treated immediately and, if necessary, the hives placed in isolation.</p>		<p>It is important to keep the use of chemicals in organic beehives strictly under MPI's control. This would also help to understand the efficiency of organic treatments and demonstrate compliance during negotiations with international markets.</p>

<p>In cases of infestation with Varroa destructor, the following set in supplementary notice can be used:</p> <ul style="list-style-type: none"> • Formic acid; • lactic acid; • acetic acid; • oxalic acid; • menthol; • thymol; • eucalyptol; or • camphor. <p>Non-synthetic remedies must be used in preference, provided that their therapeutic effect is effective for the condition for which the treatment is intended. If non-synthetic remedies are not effective, veterinary medicines may be used. The treated hives must be placed in isolation and all the wax must be replaced with organic wax. The treated hives are no longer compliant with this Standard and must undergo a conversion period in accordance with section 7.1.4 Conversion.</p>		<p>The use of any veterinary medicines in a hive should immediately mean that their organic status is removed and that the hive cannot retain organic status</p>
<p>7.1.10 Living Conditions: Hive Placement The operator must be able to demonstrate that hive placement ensures to following:</p> <p>a. During the nectar or honeydew flow period the location of hives must:</p> <p>i. Ensure enough natural nectar, honeydew, pollen sources and access to water. ii. Ensure that nectar and pollen</p>		<p>It is hard to control what landowners do, so complying with the 3km radius requirement has been a challenge for a long time. It is not really possible to require properties neighboring apiary sites to have to be organic or to follow organic principles.</p>

<p>sources within a 3km radius of the apiary site consists of organic crops, spontaneous vegetation or non-organic areas posing low risk of contamination.</p> <p>b. Land uses within a 3km radius of hive placement must not pose a risk to organic integrity including uses such as: i. Producing genetically engineered or modified plants or their products. ii. Urban centres, industrial areas, waste sites.</p>		<p>One option could be to permit beekeepers to actively manage the risks themselves by setting up agreements with landowners within 3 km of their hives that state that the landowners will not apply inappropriate chemicals on their land.</p> <p>Historically statements were gathered from neighbouring farms stating their chemical status and practice. If sprays were used, the apiary site was unable to retain its organic status.</p> <p>Auditing will be needed to ensure any requirements are met.</p> <p>As the EU organic standard has the 3 km radius rule we may not be able to get equivalence if we remove the 3 km rule from our standard and permit the use of other methods to manage the risk.</p>
<p>7.1.11 Living Conditions: Hive Placement</p> <p>Hives must be made of natural or inert materials presenting no risk of contamination to the environment or the apiary products. Beeswax for new foundations must come from organic production units. Beeswax from non-organic production units may be used for new installations or during the conversion period subject to the operator demonstrating: a. organic beeswax is not available in sufficient</p>		

<p>quality or quantity; b. the non-organic wax is free of contamination; c. the non-organic wax comes only from the cap. The protection of frames, hives and combs from pests must be done in accordance with pest management requirements under this Standard.</p>		
<p>7.1.12 Extraction, processing and storage The removal of honey or by-products must not involve the destruction of the hive. An operator must ensure that honey and bee products are not contaminated with prohibited materials or non-organic honey during extraction, processing and storage. During extraction and storage, surfaces in direct contact with honey must be constructed of food grade materials or coated with beeswax from sources meeting the requirements of this Standard. To retain its quality and composition, heating of honey for extraction must not exceed temperatures greater than 45 degrees. Only organic honey can be used for seeding to promote fine granulation. Organic wax can only be from the cap or melted down comb from the foundation of organic hives. Requirements for recording keeping of honey extraction, processing and storage may be set in supplementary notice.</p>	<p>Add the phrase 'the use of brood combs is prohibited for honey extraction' to this section.</p>	<p>Add this phrase to wherever is appropriate in this section.</p>