

13 July 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 National Organic Standard Regulations Proposals: Phase Two

Thank you for the opportunity to submit on the National Organics Regulations Standards Proposals (the revised Standard) Phase Two.

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.

Once again, we broadly support the revised standard. We support moving many of the more detailed requirements into a supplementary notice to keep the revised Standard cleaner. We look forward to being consulted on the supplemental notice in the future. Our specific comments are discussed below.

Section 1.1 Scope

The main change in the revised standard for this section is that honey is moved from being an unprocessed animal product to a processed food product. We are comfortable with this change as it is consistent with the framework for processing used in the Animal Products Act 1999.

Section 1.2 Interpretation

We support the definitions for apiary, hive and split production. We particularly support using the same definitions for apiary and for hive that are used in the Biosecurity (National American Foulbrood Pest Management Plan) Order 1998.

However, there seems to be inconsistencies in which definitions have been included in the revised standard and which have not. There are no definitions for honey or for bees, but there is one for poultry. Further, while definitions for terms used in section 1.1 such as algae and aquaculture have been included, there are no definitions for other terms such as animal products, mushrooms and propagating material. Another example is that the term poultry is defined in section 1.1 while the terms ovine and cervine are defined in section 3.4.

Section 5.4 Conversion

We also support the clarification in this section about when non-organic wax can be used in organic hives. The term 'not reasonably available' is much clearer than the term 'not commercially available' that was used in the previous draft of the Standard.

Section 5.6 Nutrition and Feed

We are pleased that our concerns about the risk of spreading American Foulbrood (AFB) by permitting the feeding organic honey and pollen to hives in situations where the survival of the hives is endangered or in emergency situations have been taken into consideration. The revised standard only allows the feeding of organic sucrose and pollen substitutes. We also note that the preferred sources and records for supplementary feed may be set in a supplementary notice.

Section 5.9 Health Management: Treatment

We support expanding this section from being focussed only on varroa to being focused on all pests and diseases that affect apiaries. We also support the provisions on non-synthetic treatments for all pests and diseases being preferred. We also support the use of synthetic treatments if non-synthetic treatments are not effective as, from an animal welfare perspective, bees should be treated effectively and promptly for pests and diseases.

Yours sincerely



Karin Kos
Chief Executive