

31 August 2023

MRL Amendments
New Zealand Food Safety
Ministry for Primary Industries
PO Box 2526
Wellington 6104
New Zealand
via email: MaximumResidueLevels@mpi.govt.nz

To whom it may concern,

Re: Submissions on proposals to amend the New Zealand (Maximum Residue levels for Agricultural Compounds) Food Notice.

Thank you for the opportunity to submit on proposals to amend the New Zealand (Maximum Residue levels for Agricultural Compounds) Food Notice.

Apiculture New Zealand (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 consultation document is proposing eight amendments to the New Zealand (Maximum Residue levels for Agricultural compounds) Food Notice. This submission will focus on the proposal to expand the entry for oxalic acid to include oxalic acid dihydrate when used as an agricultural compound for the control of varroa in beehives.

ApiNZ supports this proposal as the dihydrate form of oxalic acid is commonly used in beehives and agrees that adding this form of oxalic acid into the listing will ensure transparency for users.

Yours sincerely



Karin Kos
Chief Executive
Apiculture New Zealand