



**APICULTURE**  
NEW ZEALAND

6 September 2024

Ministry for Regulation  
WELLINGTON  
NEW ZEALAND

Via email: [reviews@regulation.govt.nz](mailto:reviews@regulation.govt.nz)

Tēnā koe

**Re: Submission on Agricultural and Horticultural Products Regulatory Review**

Thank you for the opportunity to submit on the Agricultural and Horticultural Products Regulatory Review focused on the approvals needed for any products used to manage plants and animals under the Agricultural Compounds and Veterinary Medicines (ACVM) and Hazardous Substances and New Organisms (HSNO) regulatory systems.

Apiculture New Zealand (ApiNZ) attended a primary sector briefing on the review in August and is broadly supportive of the Review, noting its overall intent to simplify the regulations for the approval of horticultural and agricultural chemicals<sup>1</sup>.

The current approval process experienced by the primary sector is too slow and stymies the ability for growers to access new and improved products and technologies. ApiNZ supports a more efficient system to speed up the introduction of new products to market. This could be achieved, for example, by streamlining the applications process through one organisation, eliminating overlap that can occur under the current system. For example, in some instances both the EPA and the ACVM Group have evaluated the same data for the same reasons.

We also recommend reviewing how overseas regulator decisions could be better incorporated into the assessment process as a way of streamlining the process.

Specifically for the beekeeping industry we would, for example, want to see any future improved miticide controls for varroa approved in a timely manner. Under the current system we could expect to be waiting years to complete the regulatory process. This level of delay would have serious implications for bee health and for the economics of the sector.

At the same time we recognise the importance of appropriately managing risk, ensuring that the risk profile of products is known and appropriately managed, including to human health, trade, animal welfare, agricultural security, and the environment.

**Apiculture New Zealand**

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We also stress that any outcomes from the review should not compromise New Zealand's reputation for producing food that is safe for domestic and international consumers to eat, and that animal welfare (bee health) is not compromised, nor that the use of agricultural and horticultural products doesn't adversely affect human health or the environment.

In summary, ApiNZ is supportive of the review in realising a more efficient and simplified system for approving products under the Agricultural Compounds and Veterinary Medicines (ACVM). In achieving this, however, there should be no unintended consequences that would compromise bee health and food safety.

### **Apiculture New Zealand**

Apiculture New Zealand (ApiNZ) is the national body representing the apiculture industry in New Zealand. It covers 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.

We would be happy to answer any questions you may have.

Ngā mihi nui



Karin Kos  
Chief Executive  
Apiculture New Zealand

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<sup>i</sup> <https://www.beehive.govt.nz/release/regulatory-review-agricultural-and-horticultural-products-now-underway>