

10 April 2025

Ministry of Foreign Affairs and Trade
email: India-FTA@mfat.govt.nz

Tēnā koe

Re: Ministry of Foreign Affairs and Trade call for public submissions on New Zealand and India's negotiations of a comprehensive Free Trade Agreement

Thank you for the opportunity to submit on the issues relevant to this trade negotiation between New Zealand and India.

Apiculture New Zealand (ApiNZ) supports the Government entering negotiations with India to develop a comprehensive Free Trade Agreement. ApiNZ's view is that reducing the barriers of trade between New Zealand and India will be economically beneficial to all participants within the New Zealand apiculture sector.

The New Zealand apiculture industry has grown strongly over the past 20 years developing into a multi-million dollar export sector, largely due to the growth and investment into exporting mānuka honey. In 2024 New Zealand honey exports generated \$413.7m in export revenue, the majority (94%) of which was from the export of mānuka honey. We expect if New Zealand honey producers and exporters had free trade access to India's 445 million 'middle-class' consumers, our industry would grow more significantly, creating more jobs within New Zealand and enabling more investment in bee health and honey product quality.

New Zealand honey is currently subject to a 65% tariff on entry to the Indian market, while Australia is exporting honey to India tariff-free.

As part of the negotiations, ApiNZ encourages the New Zealand Government to advocate strongly to remove the current 65% tariff on New Zealand honey entering India. We recommend that this is initially focused removing the tariff on mānuka honey which is unique to New Zealand, similar to the approach taken to the EU FTA signed last year, with other honeys to follow over time.

We acknowledge India has a significant honey producing and honey export sector, but do not see making New Zealand honey (especially mānuka honey) available to Indian consumers as any threat to its local industry. Typical prices for mānuka honey far exceed those for paid for honey produced in India, which means there would very unlikely be any competitive threat based on pricing.

For that reason we suggest that the FTA negotiations could take a similar approach to what has been achieved with the EU FTA signed last year, with the initial focus on removing the tariff on mānuka honey, with other honeys to follow over time.

In addition, we would encourage the Government to ensure protection is offered to products unique to New Zealand such as mānuka honey in any agreement. Significant investment has been made by industry, iwi and government to grow the mānuka honey sector. This investment has included research and resources to boost consumer confidence in the purchase of genuine mānuka honey from New Zealand.

As background, Apiculture New Zealand (ApiNZ) is the national body representing the apiculture industry in New Zealand. It covers the full range of participants, 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