

5 December 2025

The Cost Recovery Policy Team
Ministry for Primary Industries
Email: costrecovery@mpi.govt.nz

Tēnā koe

Re: Cost Recovery for MPI's Trade Certification

Apiculture New Zealand (ApiNZ) welcomes the opportunity to comment on MPI's consultation on cost recovery for trade certification.

Background

1. ApiNZ is supportive of MPI's new trade certification system, understanding the value in better supporting market access.
2. There are benefits to the apiculture sector through improved market access and minimising trade disruption, improving efficiency by removing paper-based assurances, and enhancing border clearance efficiency. However, these will need to be well-signalled so that those exporting companies can see value for money, given expected cost increases.
3. The new system will also deliver significant public benefits, including regulatory oversight and biosecurity. We support other sector groups' arguments that the Crown should fund these public good components, rather than recovering all costs from industry.

Cost Recovery Option

4. With regards to cost recovery, ApiNZ wishes to make a general comment that has been stated in previous submissions relating to cost recovery.
5. While recognising the principles behind the need for cost recovery in New Zealand's food legislation, MPI needs to demonstrate its commitment to the user's requirements for fairness, efficiency, clear allocation, and open fee-setting. These principles are embedded in most of MPI's legislation and guide its approach to recovering costs. We need to see this commitment in action with the new system.
6. We also note that the apiculture sector, like other primary sectors, is faced with ongoing cost increases, and at a time of considerable financial pressure and hardship. MPI needs to be cognisant of the environment avoiding sudden and significant cost increases that could threaten the economic viability of apiculture producers and exporters.
7. Apiculture New Zealand supports the flat fee per certification or transaction, as this is seen as fairer and simpler than volume or sector-based charging.

8. Fees should be regularly adjusted to reflect actual system costs, and to reduce the opportunity for large deficits to accumulate, as has occurred in the past resulting in significant over-recoveries. This also works to provide more certainty so that exporters can better plan for and manage costs.

About 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 sector generates over \$355 million in export revenue and is a key contributor to New Zealand's agri-sector, principally through pollination services.

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

Ngā mihi nui



Karin Kos
Chief Executive
Apiculture New Zealand