

25 November 2025

Cost Recovery Directorate
Ministry for Primary Industries
Wellington

Via email: organicsconsultation@mpi.govt.nz

Tēnā koe

Re: Organics Standard Notice – Part 7 – Bees and Bee Products – Tranche 1

Thank you for the opportunity to submit on the Organics Standard Notice.

In general, this submission recommends tighter language on inputs, expanded record-keeping, and significantly stronger hive placement and temperature rules than those currently stated in Part 7 of the draft Organics Standards Notice. Please see details of our submission below.

About 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 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, one that is founded on a healthy bee population, and an international reputation for quality, premium honeys.

The New Zealand apiculture industry has grown strongly over the past 20 years developing into a multi-million-dollar export sector (\$419 m as at 30 June 2024), largely due to the growth and investment into premium honeys like mānuka honey.

The sector has over 8,000 registered beekeepers and also plays a critical role in providing pollination services for agriculture, seed and horticulture sectors.

Proposed amendments to Organics Standard Notice – Part 7

General approach

The Notice Part 7 (regulations 128–139) mainly sets minimum record-keeping and management requirements for bees and honey, framed around specific regulatory cross-references, and is relatively permissive on some inputs and site placement.

The submission proposes more prescriptive, often stricter, requirements (e.g. limiting non-organic stock, prohibiting certain materials or treatments, narrowing feed types, capping temperatures) and asks for clarification of clauses to align with “international standards” for organic honey.

Clause 7.1 Regulation 128: Establishing New Production Units and Increasing Hive Numbers

Regulation 128 focuses on records of number of new hives and timing, plus a requirement to leave sufficient food and brood when splitting hives but does not cap non-organic introductions.

ApiNZ suggests introducing a cap on non-organic bees at 10% annually and only when organic sources are unavailable and expanding records to include origin of brood/bees/queens (with agreements and regions) and historical disease treatment records:

- 1 Operators may only introduce non-organic bees if organic sources are unavailable, with a maximum annual cap of 10%.
- 2 Operators must maintain records when establishing new production units or increasing apiary size, including:
 - a) Number of new hives and date of establishment
 - b) Origin of brood, bees, and queen bee including a sale or purchase agreement and the region hives are purchased or moved from
 - c) Any historical disease treatment records
- 3 When splitting an existing hive, operators must ensure sufficient food and brood remain to support the survival of both new and remaining hives.

Clause 7.2 Regulation 129: Renewal of Bees

Regulation 129 requires records of origin/source of non-compliant or converting colonies/queens and hive/location, and lists broad criteria for chief executive approval of renewal >10% linked to adverse events and hive loss.

ApiNZ proposes to add: (1) explicit obligation to document attempts to source organic stock, (2) an annual 10% cap on renewals using non-organic/convert-period stock if no organic source exists, (3) more granular criteria for approvals (including locations, dates, completion dates), and (4) a duty to retain records of all approvals/declines:

- 1 When renewing a colony or queen bee under OS Regulation 129, operators must record the origin (region/location/supplier) and source of the brood, bees, or queen bee, as well as the location of the new hive.
- 2 Operators must document efforts to source organic stock prior to using non-organic replacements.
- 3 If no organic source is available, operators may renew up to 10% of hives annually using brood, bees, or queen bees undergoing a conversion period. Records must include the source, location and any disease treatment of the new hive.
- 4 Criteria the chief executive must consider before approving renewal of more than 10% of colonies or queen bees (OS Regulation 129(2)) include:
 - a) Nature, location, and timing of the adverse event

- b) Extent of hive or colony loss
 - c) Location of affected hives
 - d) Number and locations of hives before the event
 - e) Number of hives and locations to be re-established
 - f) Expected completion date of renewal
 - g) Availability of compliant colonies or queen bees
 - h) Previous applications under OS Regulation 129 by the operator
- 5 Operators must retain records of any applications including approvals granted or declines under OS Regulation 129(2).

Clause 7.4 Regulation 131: Constructing Hives

Regulation 131 allows timber, metal, food-grade plastic, and water-based paint on outer boxes, plus only propolis, wax or plant oils inside, provided they do not pose risk; requires records of all materials used.

ApiNZ suggests tightening these allowances by (1) explicitly prohibiting treated wood, (2) restricting food-grade plastic to frames/foundation only, (3) specifying “lead-free” or water-based acrylics for outer boxes, and (4) expressly allowing paraffin wax among internal materials, while keeping a records requirement:

1. The following materials may be used in hive construction only if they pose no risk to the environment, bees, or bee products:
 - a) Timber and metal (treated wood is prohibited)
 - b) Food-grade plastic (restricted to frames or foundation only)
 - c) Lead-free paints or water-based acrylics (for outer boxes only)
 - d) Propolis, beeswax, paraffin wax, or plant oils identified as acceptable inputs (for internal hive use)
- 2 Operators must maintain records of all materials used in hive construction and internal treatments.

Clause 7.5 Regulation 132: Records About Beeswax

Regulation 132 already requires records on hive identity, replacement date, source, evidence of non-availability of compliant beeswax if non-organic is used, supplier details, evidence of compliance with OS Reg 132 (e.g. declarations, certificates, residue tests), quantities used and in stock.

ApiNZ seeks to reframe and “clarify” the same elements, without changing substance, but make explicit the evidence in relation to non-organic beeswax is for “non-compliant beeswax”:

Clarify Clause 7.5(f) :

- 1 Operators must maintain records for beeswax used in hives managed under the organic standard, including:
 - 1) Hive identity
 - 2) Date of beeswax replacement
 - 3) Source of beeswax

- 4) Evidence of unavailability of compliant beeswax (if non-organic is used)
- 5) Supplier name and contact details
- 6) Evidence that non-compliant beeswax meets OS Regulation 132 requirements (e.g., supplier declarations, certificates of analysis, residue testing)
- 7) Quantity used and date of use
- 8) Quantity of unused beeswax in stock

Clause 7.6 Regulation 133: Feeding During Dormant Season

Regulation 133 permits a wider set of supplementary feeds (sugar and sugar derivatives, molasses, pollen substitutes, honey, pollen) that comply with the organic standard, plus records of source, dates, quantities, and hives fed; organic honey used as feed must be shown not to be a disease source.

ApiNZ suggests narrowing permissible feeds to only organic sugar, organic honey, and organic pollen, to be used only when colony survival is threatened, and adds an explicit requirement to record supplier certification for feed:

- 1 Only the following supplementary feeds may be provided during the dormant season when survival is threatened:
 - a) Organic sugar
 - b) Organic honey
 - c) Organic pollen
- 2 If organic honey is used, operators must retain records demonstrating the honey is not a known source of disease.
- 3 Operators must record:
 - a) Source of feed and the supplier certification
 - b) Date(s) feed was provided
 - c) Quantity and type of feed per date
 - d) Hive(s) receiving the feed

Clause 7.8 Regulation 135: Bee and Hive Management

Regulation 135 lists permitted bee-removal methods (hand, escape boards, shaking/brushing, forced air blowers, smoker fuel compliant with Reg 140) and allows destruction of male brood by removal and destruction in line with principle 91(c), but does not impose a specific record-keeping duty for brood manipulation/harvest or expressly ban chemical repellents.

ApiNZ recommends (1) state that only the listed methods may be used and must be “non-destructive,” (2) explicitly prohibit chemically based bee repellents, and (3) require records of brood manipulation and harvest activities:

- 1 Bees may only be removed from hives using the following non-destructive methods:
 - a) Removal by hand

- b) Bee escape boards
- c) Shaking or brushing
- d) Forced air blowers
- e) Smoker fuel compliant with OS Regulation 140
- 2 Chemically based bee repellents are prohibited.
- 3 If a colony is infested, male brood may be destroyed only by removal and destruction in accordance with Principle 9(1)(c).
- 4 Operators must maintain records of brood manipulation and harvest activities.

Clause 7.10 Regulation 137: Treatment of Disease and Pests

Regulation 137 requires records of methods used, who administered treatment, and quantity of treatment, but does not further limit treatment types or timings beyond what is already in the regulations/inputs lists.

ApiNZ seeks to expand to (1) more detailed records (treatment type and method, person/role, quantity, date, batch number, expiry date), (2) explicit prohibition on synthetically compounded treatments and antibiotics with only approved substances allowed, and (3) a ban on treating hives during honey flow or harvest periods:

- 1 Operators must maintain records of:
 - a) Treatment type and method
 - b) Name & role of person administering treatment
 - c) Quantity administered
 - d) Date of treatment
 - e) Manufacturers batch number and expiry date of treatment
- 2 Synthetically compounded treatments and antibiotics are prohibited; only approved substances may be used.
- 3 Hives must not be treated during honey flow or harvest periods.

Clause 7.11 Regulation 138: Placement of Hives

Regulation 138 requires (1) siting hives within a 3 km radius of sufficient water and naturally occurring nectar/honeydew/pollen; (2) placement to ensure, as practicable, bees source forage from organic crops, spontaneous vegetation, or non-organic crops not treated with non-acceptable substances; and (3) records of locations (maps/GPS), evidence the forage-source requirement is met, hive movements, and compliance with OS Reg 138(1)(b).

ApiNZ recommends (1) rewording to require hives within 3 km of organic or wild forage with adequate water/nectar/honeydew/pollen, but also respecting the existence of natural buffer zones; (2) require annual land-use declarations from landowners/operators as evidence of compliance.

- 1 During the production season, hives must be located within a 3 km radius of organic or wild forage, with adequate access to water, nectar, honeydew, and pollen. Buffer zones may be

reduced if natural features that would restrict the likelihood of bee travel (such as forests, hills or waterways) and abundant compliant forage are present.

- 2 Operators must maintain records of:
 - a) Current hive locations (maps and GPS coordinates)
 - b) Evidence of compliance with subclauses (1–2)
 - c) Hive movements (origin, destination, and date)
- 3 Operators must retain records demonstrating compliance with OS Regulation 138(1)(b), including annual land use declarations from landowners/operators.

Clause 7.12 Regulation 139: Harvest and Extraction

Regulation 139 requires temperature to be kept “as low as possible” to achieve extraction, without a specific ceiling, and does not mandate temperature records.

ApiNZ proposes (1) a hard cap of 37°C on extraction and primary processing, (2) a higher limit of 47°C for secondary processing (i.e, melting honey from drums for blending and packing); and (3) a mandatory temperature log to demonstrate compliance, described as aligning with international standards.

Additional Recommendation

ApiNZ recommends including production of other bee products e.g. Bee propolis, Bee pollen, Royal Jelly, Bee Venom for use in Cosmetics and Food products.

Ngā mihi nui



Karin Kos, Chief Executive