

THE APIARY REGISTER: EXPORT CERTIFICATION VS THE PMS

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There is a group of people in and outside our industry whom I admire greatly. I admire them for their entrepreneurial spirit, their ability to cope with bureaucracy, ever changing importer demands, changing shipping schedules, fluctuations in exchange rates and not least dealing with beekeepers!

Exporters of bees and bee products

I am talking about exporters, whether they export bee products or live bees. As producers we may have a different view of this often maligned species we can call *Homoapis exportus*. They never seem too keen to pay cash for our products, they may not want some or all of our product this year, they always want more pieces of paper like harvest declarations, honey house registration certificates, apiary lists, antibiotic declarations, areas of production and so on. This may be a major pain for producers who are not too big on keeping records.

We are all exporters

We may feel we can't live with exporters but we can't live without them either. Whether we realise it or not we are all exporters. Where they go we go. What affects them affects us all. There have been a number of issues affecting exporters over the past few years and many of these have been passed onto you as suppliers. Things such as harvest declarations, food safety programmes and risk management plans, area freedoms from bee diseases, the United States Food and Drug Administration's registration requirement, the EU residue programme, tests for antibiotics and fungi and moulds, evidence of heat treatment and so on.

As difficult as all these requirements are there is something on the horizon that will make these seem like a picnic in comparison. Could we see headlines like this?

"Honey prices crash because of market oversupply"

"Local honey-mountain threatens to bankrupt beekeepers"

"Bureaucrats threaten livelihood of exporters and suppliers"

"Canadian bee importers threaten to sue New Zealand beekeepers for lost shipments"

So what is this threat? What could be so bad as to potentially ruin many beekeeping operations? Why should we worry. Before we go there let's look at what is at threat. Just what do the exporters do for us.

Honey and bee exports

NZ produces on average 8900 tonnes of honey per year and consumes about 5000 tonnes. This leaves 3000-3900 tonnes to be exported, or held as stock, to maintain local market stability. In the year ended December 2003 we exported 3190 tonnes of honey to 40 countries along with just under 1000 tonnes of beeswax. According to Statistics New Zealand these products had a free on board (FOB) value of \$28 million.

What about live bees? For the year ending December 2003 we exported 6283 queen bees and 27281 1kg equivalent packages to 4 countries. It is difficult to get a FOB value for these but even at the price paid to beekeepers for queens and bulk bees delivered to the exporter, the shipments were worth around \$700,000.

In total 87 individuals or companies requested certification from government authorities last year.

Suppliers and exporters at risk

Some of you are saying so what if we didn't ship any more live bees as I don't supply any now. That may be the case but 5 exporters and 33 suppliers mostly from the central and lower North Island may not agree. But it is not just the New Zealand producers and exporters who are at risk. The importers and beekeepers relying on our stock would be impacted as well, especially in Canada where their options for alternate supply are limited.

No one knows how many beekeepers supply honey for export but any major disruption to the export market could flood the local market and depress prices paid to beekeepers. We saw a little of this with the record crop produced in 2003. As with live bees, loss of EU export markets would affect 20-30 exporters, importers, and verification agencies as well as producers.

What is the threat to export markets?

The threat is selective but could affect exports of 1170 tonnes of bee products to about 5 countries in Europe and the French Territories. These markets are vitally important to us as they take one third of our exports and nearly all our specialty crops like honeydew, thyme honey and much of our comb honey.

Exports of live bees to Canada should not be affected but exports, to markets we hope to re-enter, such as Korea, Japan and Germany, will be.

The threat comes from the desire of the Management Agency for the AFB Pest Management Strategy to find an alternative to using the apiary register to determine area freedoms demanded by some importers or importing countries.

Apiary clearances for export

All these 'at risk' importing countries have one thing in common. They require certification that the bee products have been produced in apiaries free of American foulbrood and noseosis. The surrounding area (3-5 km) must also have had no outbreaks of these diseases within the previous 6 months. The same is generally true for live bees.

Before New Zealand government authorities will issue an export certificate (or official assurance) they require AgriQuality to check that the conditions on the export certificate have been met. Naturally AgriQuality then requires the exporter and the producer to make various declarations as well. Those declarations to do with American foulbrood (AFB) are checked against information in the apiary database.

And there is the impending problem.

Possible restrictions on using the apiary register for apiary clearances

The Management Agency (MA) for the AFB Pest Management Strategy is concerned that AFB is being under reported in areas where bee products may be exported to countries requiring area freedoms. The MA is in discussions with government authorities to see if other ways can be found to facilitate exports without having to use the apiary register.

Is the situation as serious as has been portrayed? Well, yes it may be depending on how restrictive the MA is in allowing the register to be used for exports and how quickly government authorities can find an alternative solution.

Alternatives to using the apiary register

There is little scientific justification for some of the area freedom requirements. There are a number of alternatives to using the apiary register, which exporters, MAF and the New Zealand Food Safety Authority (NZFSA) need to explore. These could include:

1. Negotiating new import protocols with importing countries or importers that don't require area freedoms. However, bilateral negotiations tend to take a long time with uncertain outcomes and they cost money. Exporters of live bees already pay a levy for this purpose but a way may need to be found to fund trade negotiations for bee products.
2. If area freedoms are still required seek equivalence based on testing for *Paenibacillus larvae* spores. This option may raise many issues such as:
 - If *P. larvae* spores are found what does that mean for the product? Can we negotiate tolerance levels such as up to 60 bacterial colony-forming units (CFU's) on the culture plates? Below this level the honey is OK for export but above this it is rejected?
 - If the product is refused for export can it still be retailed in New Zealand or should it be downgraded and only used for manufacturing as with some honey buying companies in Australia.
 - Do *P. larvae* spores evenly disperse in a drum of honey or do they sink or float, or clump? This may have implications on how samples are taken.
 - What about culture plates that are too contaminated to read?
 - What sampling rate is acceptable? Every drum or an 'extraction run'.
 - Who takes the sample and which lab does the testing?
 - What about other bee products such as beeswax, and particularly pollen, where contamination of the culture plates is common.

Threat or opportunity

The PMS Management Agency (MA) is keen to encourage full and timely reporting of AFB and sees the use of the apiary register for determining area freedoms as counter productive to that aim. If the MA instructed its contractors not to use the database for export certification then there is an immediate threat to over 1000 tonnes of bee products into the EU and the recovery of the live bee trade with Japan, Korea and the EU.

However, a move to 'end point inspection,' which involves testing samples of product for *P. larvae* spores, may be an opportunity to test how beekeepers are dealing with AFB infected hives. The use of the apiary register to validate area freedoms statements still relies on beekeepers reporting AFB. Testing bees or bee products prior to export may offer an opportunity to increase the level of auditing on AFB declarations. In the past random testing of retail and bulk honeys delivered to packers has revealed a high level of contamination with *P. larvae* spores.

Summary

The New Zealand beekeeping industry has to find a way to encourage full reporting of AFB and at the same time facilitate exports to major EU markets. This may mean a move away from using the apiary register for export certification and a move to testing export product for the presence or absence of *P. larvae* spores. This fundamental change is both an opportunity and a threat to the industry, which will require full cooperation from all interested parties. The dialogue has already started but all beekeepers need to be involved, as it will affect you one way or the other.