



Australian Government
**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on APIVAR 500 mg Bee Hive Strips For
Honey Bees for use in honey bee hives**

Submissions received

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AUSTRALIAN HONEY BEE INDUSTRY COUNCIL INC

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Trade Advice Notice on APIVAR 500 mg Bee Hive Strips For Honey Bees for use in honey bee hives

The Australian Honey Bee Industry Council Inc. (AHBIC) is the peak body for the beekeeping industry in Australia. It is made up of the Queensland Beekeepers Association Inc., New South Wales Apiarists Association Inc., Victorian Apiarists Association Inc., Tasmanian Beekeepers Association Inc., South Australian Apiarists Association Inc., Bee Industry Council of Western Australia Inc., Australian Queen Bee Breeders Association Inc., Honey Packers and Marketeers Association of Australia Inc., National Council of Crop Pollinators and the Amateur Beekeepers Association of New South Wales. Further information on AHBIC can be found at our webpage www.honeybee.org.au

The Australian Honey Bee Council Inc. (AHBIC) puts forward the following comments in relation to the above.

Please note that the Council of AHBIC unanimously voted for no shelf registration or a MRL for amitraz as the conditions of use cannot be complied with in Australia

Under the requirements for use, as published in the trade advice, AHBIC would submit that there are very few beekeepers in Australia who could use the amitraz in compliance to these instructions. For example:-

- *A full 6 to 10 weeks in the hive* – Beekeepers in Australia would not be able to leave the strips in the hive for this amount of time and not suffer financial losses due to lack of honey production or providing a pollination service particularly in spring.
- *DO NOT USE APIVAR while honey supers are present* – Beekeepers in Australia will have honey supers on hives so as to provide food for their bees during winter (autumn treatment) and if all this honey is not consumed by the bees it will be extracted at a later date. In spring beekeepers need to allow for expansion of the bee numbers in the hive otherwise hives are at risk of swarming.

- *DO NOT USE during honey flow* – For some beekeepers in Australia they can be on a honey flow for almost 12 months of the year. Even in colder southern States there can be a honey flow in late winter/early spring e.g. canola. For beekeepers to forgo this honey flow due to treating hives with Apivar in spring would put many beekeepers in financial difficulties.
- *DO NOT extract honey from the brood chamber* – In Australia most beekeepers practice brood comb rotation. This involves taking combs from the brood chamber and putting above the queen excluder. These combs are then extracted when that super comes in to the shed and often those combs are then discarded. Many beekeepers rotate out three (3) combs per season so that total rotation is completed every three (3) years.
- *DO NOT harvest honey when the treatment is in place* – This would be possible but does involve having honey supers on the hive which is in contravention of the proposed label.
- *COMB HONEY/PROPOLIS/ROYAL JELLY: DO NOT make comb honey, propolis, royal jelly from treated bees or hives available for human consumption* – Does this mean that if a hive is treated once with amitraz then it can never be used for the above purposes?
- *Brood combs should be replaced with a new foundation at least every three years. Do not recycle brood frames as honey frames* – As discussed above Australian beekeepers do practice brood comb rotation. However many do not use foundation but have combs that have been drawn above the queen excluder, are extracted then that new drawn comb is used in the rotation process. Many beekeepers find that using foundation in the brood box often leads to bees chewing out along the wires and thus producing an unsatisfactory brood comb.

If you have any questions please feel free to contact AHBIC at any time.

Australian Honey Bee Industry Council Inc.
26 February 2021





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Submission to the: Australian Pesticides and Veterinary Medicines Authority

Re: Amitraz in the Product APIVAR 500mg Beehive Strips for Honeybees for Use in Beehives in Australia

Saxvik Honey and Pollination have been involved in beekeeping for over seventy years. Not only are we honey gatherers but also pollinate a variety of agricultural crops. We are brokers for several Almond companies. We provide pure honey products to our packer.

I feel the introduction of APIVAR into Australia is not an option for the Australian Beekeeping industry at this time.

I base our reasoning on:

- APIVAR contains Amitraz which is a synthetic nerve poison. The residues of Amitraz have been repeatedly reported in hive products and may be of concern for human health.
- The three studies conducted and supplied took place in France, under French conditions in 1993, 1998 and 2015. A minimum number of hives were used to assess possible residues of Amitraz. These studies are not relevant to our Australian conditions, nor were there a substantial number of hives utilised in these studies to fully assess the risks and issues that could be associated with this product.
- Australia is in the top ten honey producing countries in the world. Honey produced here is exported to a number of countries overseas as is other honey products, beeswax, queen bees, packed bees, pollen and propolis. By using this product our Clean Green Image for honey and bee products would be in jeopardy.
- Commercial beekeepers can move their hives up to 20 times a year to various locations to gather honey or pollinate crops. The suggested timing of the applications of the strips would be difficult for commercial beekeepers. Australia has a long beekeeping season which would cause an overlap of treatment with our honey flows.
- Our flora is truly diverse with large varieties of Eucalyptus flowering all year round. Crop pollination occurs from late winter through the summer months.

Varroa is not present in Australia at this time, so why allow APIVAR to be introduced. It is obvious that our climate, flora, and seasons has not been properly assessed by the manufacturers of this product. There are many other less threatening options to control the varroa mite if it appears in our country.

Harold J Saxvik
Commercial Apiarist
28/01/2021