

29 October 2024

Re: AHBIC meeting with APVMA to discuss varroa treatments.

Dear members:

The AHBIC board recently met with senior personnel of the APVMA regarding the management of Varroa mite in Australia. Key discussion points included:

1. Chemical Registrations:

- There are two main pathways to making products available.
 - Full product registration – this is the preferred method for the APVMA as it provides stability and a long-term solution.
 - Emergency use or minor use permits – this pathway is a temporary solution for short-term access to chemistry.

2. Who can apply for registrations/permits:

- Full registration – some options include:
 - Manufacturer application
 - Third party registration i.e. association or agent but they must have access to all the underlying data which is usually held by the manufacturer.
- International data from comparable countries, such as the EU, can help speed up the registration process.

3. Liability for Unregistered Products:

- Beekeepers using unregistered products could face penalties. It is crucial to only use registered treatments or those authorized under a permit.
- Compliance for use of unregistered product is the responsibility of the state or territory jurisdiction.
- It is an offence to import or supply AgVet product that is not registered by the APVMA. The APVMA shares responsibility with other agencies in preventing unregistered chemical products reaching the domestic market.

4. Own-Use Permits:

- In New Zealand, Schedule 2 of the ACVM (Exemptions and Prohibited Substances) Regulations 2011 provides for an exemption from registration under the ACVM Act referred to as the 'own use' exemption. The exemption applies to a substance or compound prepared by a person for use on animals or plants that they own, or on any land, place or water that they own or occupy.

- The APVMA was clear that these ‘own use exemption’ provisions that exist in New Zealand are not allowed under Australia’s legislation. Therefore, legislative reform (which is a lengthy process that is managed by the AgVet Policy branch of DAFF) would be required to introduce similar provisions here
- The discussion, which was based on published guidance from ACVM, highlighted some significant limitations that would need to be considered including;¹
 - The NZ guidance applies to agricultural chemicals not veterinary medicines. Under the AgVet Code in Australia, varroa treatments are veterinary medicines.
 - The exemption only authorises use on their own bees. It does not authorise the sale (including gifting), distribution, or promotion of treatments.
 - One clause in the NZ own use exemption is that the treatment must not be toxic to animals that are treated or exposed to the treatment. This statement is ambiguous and would need clear definition and supporting data.
 - Under the own use exemption, the beekeeper is responsible for managing the risks associated with compounds they have prepared. If beekeepers do not manage the risks, then they could be subject to compliance action under the ACVM Act and its related legislation.


5. Industry Stewardship and Resistance:

- To protect the available treatments, we must implement strategies to avoid resistance. Overuse or misuse of treatments can lead to long-term issues for the industry.
- Industry should consider developing a resistance management plan to promote chemical rotations to prevent resistance. Examples are Croplife and the Cotton industry.

6. Is there more AHBIC can do as an association:

- In Australia varroa treatments are veterinary medicines which means that Good Manufacturing Practice (GMP) is a requirement for registration. AHBIC could approach DAFF to discuss whether the GMP requirement might be relaxed for products that are manufactured under alternative quality assurance programs. This might facilitate access to products registered overseas in jurisdictions where varroacides are regulated as agricultural chemicals, for example Oxalic Acid strips, which are registered in the US.

¹ <https://www.mpi.govt.nz/dmsdocument/39404-Guidance-document-Advertising-and-own-use-guidance-for-compounds-for-management-of-disease-in-beehives.pdf>





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AHBIC will continue to liaise with the APVMA and DAFF to ensure we are doing all we can to register as many varroa treatment options as possible.

Regards,

Danny Le Feuvre

CEO – Australian Honey Bee Industry Council

Link to:

[AHBIC Chemical Treatment Table](#)

Chemical	Active Ingredient	Mode of Action	Application	Resistance	Notes
Apivar	Baculovirus	Systemic	Top Dressing	Low	Approved for use on honey bees
Checkmate	Spinosyn D	Contact	Top Dressing	Low	Approved for use on honey bees
Bayvar	Baylis Thuringiensis	Contact	Top Dressing	Low	Approved for use on honey bees
... (other treatments)

