



Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

The Ministry for Primary Industries (MPI) proposes to consolidate, clarify, and introduce export requirements for all bee products intended for export.

You are invited to have your say on the proposed changes, which are explained in the discussion document and specified in the draft Animal Products Notice: General Export Requirement for Bee Products notice.

Consultation closes on **23 May 2017**.

How to have your say

Have your say by answering the questions in the discussion document, or commenting on any part of the proposals outlined in the draft Animal Products Notice: General Export Requirements for Bee Products. This submission form provides a template for you to enter your answers to the questions in the discussion document and email your submission back to MPI.

Please include the following information in your submission:

- ☐ the title of the discussion document 'Proposed General Export Requirements for Bee Products';
- ☐ your name and title;
- ☐ your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it; and
- ☐ your contact details (such as phone number, address, and email).

MPI encourages you to make your submission electronically if possible. Please email your submission to: manuka.honey@mpi.govt.nz

If you wish to make your submission in writing, these should be posted to the following address:

General Export Requirements for Bee Products Submission
MPI Food Assurance Team
PO Box 2526
Wellington 6140

The following points may be of assistance in preparing comments:

- ☐ where possible, comments should be specific to a particular section in the document. All major sections are numbered and these numbers should be used to link comments to the document;
- ☐ where possible, reasons and/or data to support comments should be provided;
- ☐ the use of examples to illustrate particular points is encouraged; and
- ☐ as a number of copies may be made of your comments, please use a legible font and quality print, or make sure hand-written comments are clear in black or blue ink.

Submissions are public information

Everyone has the right to request information held by government organisations, known as “official information”. Under the Official Information Act 1982, information is to be made available to requesters unless there are good or conclusive grounds under the Official Information Act for withholding it.

If you are submitting on this discussion document, you may wish to indicate any grounds for withholding information contained in your submission. Reasons for withholding information could include that information is commercially sensitive, or that the submitters wish personal information such as names or contact details to be withheld. MPI will consider such grounds when deciding whether or not to release information.

Any decision to withhold information requested under the Official Information Act 1982 may be reviewed by the Ombudsman.

For more information please visit <http://www.ombudsman.parliament.nz/resources-and-publications/guides/official-information-legislation-guides>

Your details

Your name and title:	s 9(2)(a)
Your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it:	
Your contact details (such as phone number, address, and email):	s 9(2)(a)

General questions: getting to know you

1. What part of the supply chain do you operate in:

- ☒ beekeeper
- ☐ extractor
- ☒ processor
- ☒ packer
- ☒ exporter
- ☐ retailer of bee products
- ☒ other – please specify - Wholesaler

2. How long have you been involved in the apiculture industry:

- ☐ 0-5 years
- ☐ 5-10 years
- ☒ 10 + years
- ☐ not applicable

3. Do you operate under:

- ☒ an RMP under the Animal Products Act 1999
- ☐ the Food Act 2014 (Food Control Plan or National Programme)
- ☐ the Food Hygiene Regulations
- ☐ none of these
- ☐ not applicable

4. If you are a beekeeper, how many hives do you currently have:

- ☐ 0 – 5
- ☐ 6 – 50
- ☐ 51 – 500
- ☐ 501 – 1000
- ☒ 1001 to 3000
- ☐ More than 3000

5. What region of New Zealand do you operate in?

Bay of Plenty

6. If you export bee products please tell us a little about your business. How many people do you currently employ?

☐ 0

☐ 1 – 5

☒ 6 – 19

☐ 20 or more

What are the roles of your employees and how many are:

☒ beekeepers - 4

☒ processors

☒ packers - 2

☒ other – please specify Sales & Office - 2

Impact of compliance costs for beekeepers, processors and exporters

7. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

Without a doubt it will increase the compliance costs.

Clause 3.2 / 3.3 / part 4 & part 7 The increase in cost is hard to measure. But it will require more administration time.

Clause 5.1-5.3 This can be a huge cost as labels are designed not to come off.

Clause 5.4 / 5.6 / part 6 – mostly relating to testing. **Tests imposed need to be more cost effective.**

Comparison of current Manuka testing done on one batch of honey:

Current: \$69.00 inc gst

Proposed tests: \$152.95 inc gst

As in all situations someone has to pay for this.... It will be the consumer. There is not a large margin in producing honey & packing for sale. As beekeepers & packers we see the costs from the start to the finish. We have seen a lot of changes in compliance costs over the 40 years of business. **The biggest impact will be the cost of the tests required for honey...It is over double the cost of tests already done.**

8. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exporters of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

Our Greatest concern is the tests for Manuka Clause 5.4 & part 6 Laboratory tests:

We believe that there needs to be a standard for Manuka & appreciate what MPI has tried to do, however it is not right. We are long standing member of UMFHA and have produced & packed Manuka honey for 40 Years. Currently we sell UMF rated honey & a Manuka Blend. Our end customers love our honey and get regular comments on how nice our Manuka Blend is compared to other companies. Out of interest we tested our stock honey & were shocked at the results:

UMF 10+ = passed chemical markers and just passed DNA at 35.80Cq, this is a good quality Manuka rated at UMF 11.3 with decent Leptosperin levels. This is honey we produced we know it is good Manuka but only just passed the DNA test.

Results like this will make it difficult to get UMF 10+ honey to label.

UMF 5+ = passed chemical markers but failed DNA – it came back as ND. Again this is a good quality 5+ with test results of UMF 7.1. This is honey we produced we know where it came from and know it is Manuka 5+ at least.....Result – Fail not Manuka honey – by DNA.

Results like this will mean that we have no honey in bulk storage to meet the requirements. What level UMF do I need to buy to have a UMF 5+? If it has to be high we will see at least a double in the price of UMF 5+ honey on the shelf the consumer will not be happy and will make honey even more expensive. We may even consider not selling this product.

We feel there needs to be a better distinction between Mono & Multi Flora Manuka. The whole point of a Multi Flora Manuka is that consumers can get an affordable honey if they cannot pay for the Mono Flora Manuka. If it is labelled clearly that it is a Multi Flora Manuka with an MG rating that has been tested surely this is clarity for the consumer and they know exactly what they are getting. I guess the answer is not simple. However the proposed testing standards are way off the mark. As mentioned before Yes we need to do something. But get this wrong and the cost to the industry runs into the millions and could see the name of Manuka more untrusted than it is now.

Note: On the 7th June the testing of the DNA was altered. This has not given the industry a fair amount of time to retest their product and comment on the changes. **The submission date should have been pushed out when the science changed. Six days after changes to testing is not enough time!!**

The above results were before the change to the DNA testing.

9. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be

(e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

I think most costs are covered. I do not see these costs being huge.

No additional substances to be present in New Zealand honey

10. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

Good beekeepers should not be feeding while a honey flow is on. However how do you make a clear definition on when the honey is being collected it ranges from September through to March. During this period beekeepers will need to feed in some areas. Why would a beekeeper choose to dilute honey with sugar feed as they will not get top dollar for their honey any way it does not make sense. There are already tests to check for sugar in honey and customers can request this. I do not believe that there needs to be strict guide lines around this.

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

Just leave it to the beekeepers...they are a very smart bunch. Tests can be done to prove what is in the honey.

11. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☒ I agree because:

I guess there is no other way around it. However even within this there needs to be the understanding of the practicalities of having strictly not brood comb in honey producing boxes. It is not easy to ensure all boxes off 1000 hives meet this criteria strictly.

☐ I disagree because:

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

Testing for varrocidides in the extracted honey.

Processors of bee products to operate under a risk based measure

12. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

☒ I agree because:

There needs to be a uniform standard that all must comply with... not just keep hammering the good processors that are doing their best to meet standards.

☐ I disagree because:

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

Bee products to be sourced from listed beekeepers

13. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☒ I agree because:

Yes again one standard for all.

☐ I disagree because:

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

Pre-processing traceability requirements

14. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

As a beekeeper & processor we feel that the systems in place provide traceability of which site the honey came from and that is enough. Each site has its own details and records of treatment of hives on that site. It works and I do not think it needs changing. All these little changes keep adding more paper work and cost onto the beekeeper / processor then end result is the consumer will pay more & more. Do you want NZ honey to be super expensive and the producer of the honey not actually generating more revenue...therefore of no benefit to New Zealand as a whole.

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

15. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

It will increase cost no doubt. It may even mean that more staff are required as more time is spent in paper work and not in beekeeping.

Traceability from beekeepers to operators – harvest declarations

16. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☒ I agree because:

One rule for all. It would be the easiest to monitor.

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

17. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☐ I agree because:

☒ I disagree because:

How do you measure the cost in time that it will take. During my years here my job has become solely management & administration...prior to this I could also process & do beekeeping. This change has come about from the increased forms & compliance requirements. Each change may be small but they keep coming. Each little change requires more paper work & time. If the industry continues to have more & more rules & restrictions placed on it, it will make honey more expensive and turn people away from pursuing a career in beekeeping. There needs to be a point where we stop more & more rules & let common sense prevail. This is our livelihood most beekeepers will ensure they put forward the best quality product to the market by whatever means & do not need to be told how to manage their hives. A top quality product demands a top price.

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

18. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☒ I agree because:

It is the easy way

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Labelling of monofloral and multifloral mānuka honey

19. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☐ I agree because:

☒ I disagree because:

On the 7th June we were notified that the test had been changed. There has not been enough time to retest & form a decision. As things stand from the test we have conducted I believe that testing system is not right. Therefore nothing should be imposed until fixed.

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

Yes. Leptosperin levels can be tested in Manuka honey. Maybe this could be used in conjunction with the chemical marker test which is more reliable than the DNA test.

20. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☒ I agree because:

Though relabelling is really not an option. Have you ever tried to remove hundreds of labels designed to be not removable of pots remove glue & relabel?

☐ I disagree because:

☐ I have concerns because:

21. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☐ I agree because:

☐ I disagree because:

22. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☒ I agree because:

It's working well.

☐ I disagree because:

23. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

Well a huge impact. If the honey tests high in UMF (Unique Manuka Factor) but does not test as Manuka honey....Quite a lot of an impact. What do you label your product as now?

24. Do you have any comments on the summary science report?

25. Do you have any further comments regarding the definition of mānuka honey?

On the 7th June the testing of the DNA was altered. This has not given the industry a fair amount of time to retest their product and comment on the changes. **The submission date should have been pushed out when the science changed. Six days after changes is not enough time!!**

I believe there needs to be changes around labelling of Manuka. I appreciate the steps taken so far. Please consult with the industry better, get the science right and do this well. Our livelihoods depend on this...we are at your mercy.

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☐ I agree because:

☒ I disagree because:

I cannot comment fairly on this as the tests have changed & I have not been given enough time to retest my honey to assess changes.

27. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

The testing cost is over double of the current tests done. We do a lot of testing and consider the impact of cost significant. The tests need to be more cost effective.

Do you have any suggestions for minimising any impacts?

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree and propose an alternative timeframe:

This needs to be longer – more like 6 months. Honey has a long shelf life and many companies have a lot of stock in storage due to the fact that it does not go off.

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

☒ I agree because:

At least or longer. Honey has a long shelf life and many companies have large stocks of honey in storage.

☐ I disagree because:

Any other feedback

30. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).

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Your details

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General questions: getting to know you

1. What part of the supply chain do you operate in:

- ☒ beekeeper
- ☒ extractor
- ☒ processor
- ☐ packer
- ☐ exporter
- ☐ retailer of bee products
- ☐ other – please specify

2. How long have you been involved in the apiculture industry:

- ☐ 0-5 years
- ☐ 5-10 years
- ☒ 10 + years
- ☐ not applicable

3. Do you operate under:

- ☒ an RMP under the Animal Products Act 1999
- ☐ the Food Act 2014 (Food Control Plan or National Programme)
- ☐ the Food Hygiene Regulations
- ☐ none of these
- ☐ not applicable

4. If you are a beekeeper, how many hives do you currently have:

- ☐ 0 – 5
- ☐ 6 – 50
- ☐ 51 – 500
- ☐ 501 – 1000
- ☒ 1001 to 3000
- ☐ More than 3000

5. What region of New Zealand do you operate in?

Southland

6. If you export bee products please tell us a little about your business. How many people do you currently employ?

☐ 0

☒ 1 – 5

☐ 6 – 19

☐ 20 or more

What are the roles of your employees and how many are:

☒ beekeepers

☒ processors

☐ packers

☐ other – please specify

Impact of compliance costs for beekeepers, processors and exporters

7. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

Introduction of more costs means less staff will be employed- each dollar can only be spent once.

8. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exports of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

9. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be (e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

There is already an extra spring audit imposed on RMP operators which in our case is an extra \$1100 plus GST for what is no more than rechecking the paper work that was checked in the processing season and checking the mouse traps, as well as the recent doubling of the MPI registration charge.

These proposals will impose extra costs in the form of staff training, slowing the work rate of field work(either not completing work on time, or requiring more staff straining finances.

No additional substances to be present in New Zealand honey

10. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

Often honey supers are added for purposes of swarm control- taking pressure of overpopulation off the brood nest. In our outfit the flow can begin anywhere between early December all the way through to early February, the bees must be fed until they can support themselves, or they are dead.

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

Control or track the importation of synthetic DHA.
Implement some best practise guidelines for supplementary feeding

11. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

Although I firmly believe extracting true old brood combs is bad practise (quality of the honey is often poorer from a brood comb from darkening of the honey and tastes of old comb) , it is up to interpretation what is actually a brood comb as sometimes a queen can get to a part of the hive not intended and lay brood there short term.

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

Simple-- Ban the use of all varroacides while supers are on hives. Both families of synthetics have made beekeepers sick that I know and yet Bayvarol is able to be used with the crop on . I am also aware that Apivar is sometimes being used off label during the production period.
In my opinion at the moment anybody can purchase any amount of these varroacides and there is no oversight of their use.
Suggestion- The synthetics need to be tracked and their administration and removal from hives should be recorded. Operators need to be through a course and be certified on the safe and appropriate use of these strips, just as any other agricultural chemical.
Farmers are also required to have an annual consult with their vet to be able to purchase and administer PARs., and yet Beekeepers have no requirements for good chemical use placed on them.

Processors of bee products to operate under a risk based measure

12. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

Bee products to be sourced from listed beekeepers

13. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

☒ I disagree because:

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

Pre-processing traceability requirements

14. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

Total waste of operator effort and time for no benefit.
Tracking empty supers around the outfit is of no benefit at all, only imposes ridiculous extra effort on behalf of operators.

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

There already is a satisfactory system with the harvest decs.
A Beekeepers Assurance Program along similar lines to meat company Farm Assurance Program to encourage good production practices could be implemented

15. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

Tracking empty supers would add approx. 25% cost/time over the summer months.

Traceability from beekeepers to operators – harvest declarations

16. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☒ I agree because:

I thought it was already a requirement

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

17. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☐ I agree because:

☐ I disagree because:

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

18. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☒ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Labelling of monofloral and multifloral mānuka honey

19. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

20. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☐ I agree because:

☐ I disagree because:

☐ I have concerns because:

21. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☐ I agree because:

☐ I disagree because:

22. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☐ I agree because:

☐ I disagree because:

23. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

24. Do you have any comments on the summary science report?

25. Do you have any further comments regarding the definition of mānuka honey?

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☐ I agree because:

☐ I disagree because:

27. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

Currently around \$200 a test. Gets very expensive if each drum is tested and turns out to not be Manuka or Manuka blend

Do you have any suggestions for minimising any impacts?

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree and propose an alternative timeframe:

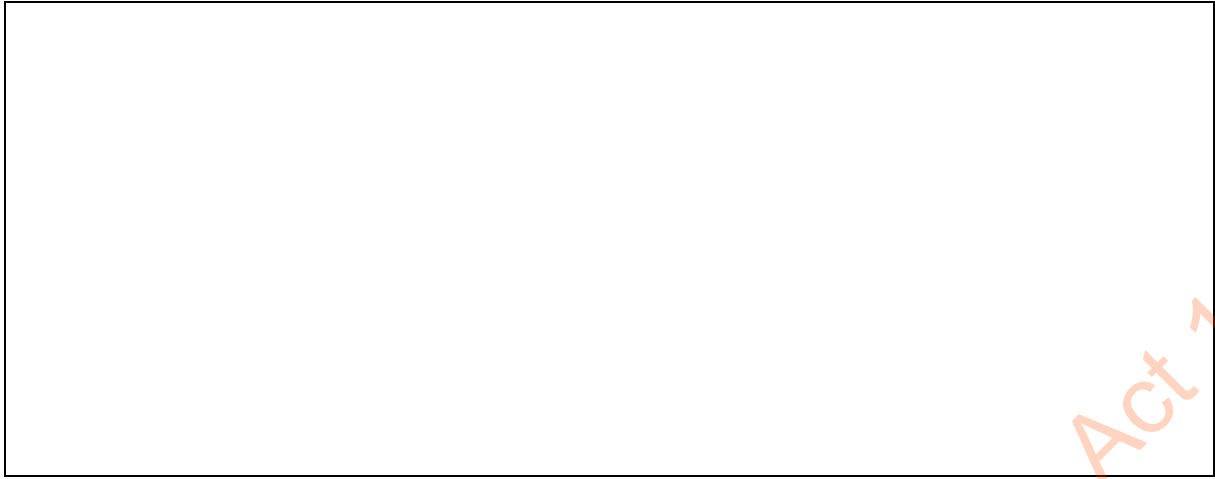
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☐ I agree because:

☐ I disagree because:

Any other feedback

30. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).





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- ☐ your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it; and
- ☐ your contact details (such as phone number, address, and email).

MPI encourages you to make your submission electronically if possible. Please email your submission to: manuka.honey@mpi.govt.nz

If you wish to make your submission in writing, these should be posted to the following address:

General Export Requirements for Bee Products Submission
MPI Food Assurance Team
PO Box 2526
Wellington 6140

The following points may be of assistance in preparing comments:

- ☐ where possible, comments should be specific to a particular section in the document. All major sections are numbered and these numbers should be used to link comments to the document;
- ☐ where possible, reasons and/or data to support comments should be provided;
- ☐ the use of examples to illustrate particular points is encouraged; and
- ☐ as a number of copies may be made of your comments, please use a legible font and quality print, or make sure hand-written comments are clear in black or blue ink.

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Everyone has the right to request information held by government organisations, known as “official information”. Under the Official Information Act 1982, information is to be made available to requesters unless there are good or conclusive grounds under the Official Information Act for withholding it.

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Your details

Your name and title:	§ 9(2)(a)
Your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it:	§ 9(2)(a)
Your contact details (such as phone number, address, and email):	§ 9(2)(a) _____ _____ _____

General questions: getting to know you

1. What part of the supply chain do you operate in:

- ☒ beekeeper
- ☒ extractor
- ☒ processor
- ☒ packer
- ☒ exporter
- ☒ retailer of bee products
- ☐ other – please specify

2. How long have you been involved in the apiculture industry:

- ☐ 0-5 years
- ☐ 5-10 years
- ☒ 10 + years
- ☐ not applicable

3. Do you operate under:

- ☒ an RMP under the Animal Products Act 1999
- ☐ the Food Act 2014 (Food Control Plan or National Programme)
- ☐ the Food Hygiene Regulations
- ☐ none of these
- ☐ not applicable

4. If you are a beekeeper, how many hives do you currently have:

- ☐ 0 – 5
- ☐ 6 – 50
- ☐ 51 – 500
- ☐ 501 – 1000
- ☒ 1001 to 3000
- ☐ More than 3000

5. What region of New Zealand do you operate in?

Taranaki

6. If you export bee products please tell us a little about your business. How many people do you currently employ?

☐ 0

☒ 1 – 5

☐ 6 – 19

☐ 20 or more

What are the roles of your employees and how many are:

☒ beekeepers x 2

☒ processors x 1

☒ packers x 1

☐ other – please specify

Impact of compliance costs for beekeepers, processors and exporters

7. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

Excessive increase in costs for no gain. The costs due to the Manuka Standard will be of benefit but the costs associated with Box Traceability will be far in excess of any gains.

8. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exports of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

Traceability of boxes will not work because the frames get sorted between boxes as we are collecting and extracting honey. The contents of the box will have no relation to where the hives are that the honey came from. Trying to keep the frames in the same box all the time will result in increased costs of extraction when only one frame has honey in and the other 9 have none. Brood comb rotation is done by moving old brood comb into the honey boxes then the old frames are discarded during extraction. Any other way will increase costs.
Internet Sales – if each pot being exported needs a certificate it will price the product off the market, making our business uneconomic.

9. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be (e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

Admin costs – already have one person spending hours dealing with e-decs and RMP forms. These proposals will swamp us with more admin, making our business no longer viable. We don't have a large staff to spread the work load.

No additional substances to be present in New Zealand honey

10. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☒ I agree because:

Sometimes we have to feed the bees and have honey supers on at the same time because the change from no honey flow to a honey flow can occur in a short period of time and we don't have the resources to get back there in time.

☐ I disagree because:

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

Overstocking of bees is causing us to be in a situation where there is not enough nectar to go around and our bees are hungry while honey boxes are on. If we want the bees to survive we have no alternative but to feed them. We would suggest that the Manuka Madness be stopped or limited as it doesn't help anyone. We are beekeepers that keep our hives on sites all year round but are being forced to feed our hives to keep them alive because of the transit bees arriving and swamping us.

11. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

Problem is that MPI has no definition of a brood nest. At times, the queen can lay right up into the honey supers, does this make them part of the brood nest or are they still honey supers?

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

MPI could assist the beekeepers to find alternative Varroa treatment methods that don't leave residues.

Processors of bee products to operate under a risk based measure

12. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

☒ I agree because:

We will all have to pay the same fees and be on an equal footing.

☐ I disagree because:

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

Ensure all councils enforce honey products being sold in markets to have been processed in RMP or equivalent.

Bee products to be sourced from listed beekeepers

13. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

☒ I disagree because:

This should include domestic sales too.

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

Ensure all bee products treated same whether export or domestic sales.

Pre-processing traceability requirements

14. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

The harvest declaration already requires us to declare which apiaries the honey comes from. There is no economic benefit to trace the honey back to the beehive. The only way that you can trace honey back to the bee hive is for each individual frame to be marked and extracted separately. Tagging or bar coding each frame having software or systems to track the frames would add huge costs to our business (not all of us are Manuka Millionaires)

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

Frames in boxes get moved from box to box during honey collection and processing due to operational requirements. Perhaps each individual frame should be traced rather than the boxes. This would give the traceability you want. It would have to be subsidised by MPI as not everyone can afford this kind of system but if that's what you want then that's how you can get it.

15. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

HUGE – We don't have computer tracking systems. We would have to invest in extra staff to work the system, tagging each box (or frame) and computer systems to record the use the information. Our business could not afford this or sustain this.

Traceability from beekeepers to operators – harvest declarations

16. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

☒ I disagree because:

It should be for ALL honey and bee products, domestic and export.

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

You haven't told us what you are trying to achieve, we can't give you alternatives because we don't know what the end requirement is.

17. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☐ I agree because:

☒ I disagree because:

Already the RMP costs have doubled with 6 monthly audits instead of annual audits. Residue testing levy put on each RMP (whether it is exporting or not) means those of use with 2 RMP's get double costs when only one of the RMP's actually exports. The same honey gets double the RMP costs. AFB PMP Levies, ACC, E-Dec audits every time we raise an e-dec to move some honey (even if it is between our own RMP facilities) currently \$70 each time one is raised. Our compliant costs are already huge. Our admin lady is currently overworked keeping up to date with the above, we would have to employ another person to help her and this is not sustainable.

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

18. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☐ I agree because:

☒ I disagree because:

This should be for ALL bee products whether Domestic or Export but must be affordable. Paper transfer documents covered both of these but now traceability is non existent for domestic products. Remember that most countries (eg Singapore) don't need traceability requirements so Domestic honey can be exported with no paperwork.

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Make the e-dec system more affordable by removing the requirement for RMP auditor to verify every movement (this excessive compliance costs means people will find ways of moving honey about that bypass the traceability system).

Labelling of monofloral and multifloral mānuka honey

19. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☐ I agree because:

☒ I disagree because:

Should be implemented for ALL honey not just export because you can currently export domestic grade honey without paperwork which makes the export paperwork irrelevant.

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

Set up a new grade of honey that could be called Health Grade honey that uses DHA and MGO to grade it but not the name Manuka. Only table grade would be allowed to be called Manuka Honey without the use of UMF etc.

20. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☒ I agree because:

Many businesses sell a range of honey that are clearly not manuka but labelled manuka. This needs to stop. It will affect the businesses who are carrying out this practice but removing this practice from the honey industry will be better for the honey industry overall.

☐ I disagree because:

☒ I have concerns because:

The consumer has been conditioned to think that anything with the word manuka in it will cure all of their illnesses, this is clearly not the case. The government needs to assist the industry in re-educating the consumer about the real properties of ALL honey. Just putting a manuka definition will not fix the perception about manuka honey. It is not in the industry's interests to have this perception fixed or corrected.

21. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☒ I agree because:

The consumer has a right to know that the product they are buying is actually the product correctly labelled and is the product in the jar. That right outweighs any businesses trade mark claims.

☐ I disagree because:

22. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☐ I agree because:

☒ I disagree because:

There should be table honey and health benefits grade of honey. On the health benefits grade of honey there should be advertised as honey with MGO, DHA levels or whatever the business is trying to claim is in the honey. Honey floral types should not be used in this grading.

23. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

The current grading systems are flawed. The grading systems should be split into Table honey and Honey with Health Benefit Claims. Without the use of floral types.

24. Do you have any comments on the summary science report?

No

25. Do you have any further comments regarding the definition of mānuka honey?

Please get it right so we can fix this madness.

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☒ I agree because:

So long as the tests work (looks like work still to be done on the DNA part). They need to be able to detect a true monofloral honey.

☐ I disagree because:

27. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

Hopefully it will reduce the amount of dodgy manuka honey on the market, increasing the overall quality of the honey and bring the honey industry back into a more sustainable level.

Do you have any suggestions for minimising any impacts?

Because there is so much fraud going on, there needs to be a big shake up and trying to minimise impacts will not work – you might as well do nothing.

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree and propose an alternative timeframe:

Because this proposal is currently un-workable another round of consultation needs to be held to ensure that the next draft of the GREX is workable. 6 weeks to introduce the proposed workable systems is not practical and will probably lead to people ignoring them.

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

Honey has a shelf life of approx. 2 years where as packers sometimes have packed a line of honey that may take 18 months to move off the shelves.

Any other feedback

30. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).

The assumption that these suggests are workable for a small family business with minimal costs is flawed. Not all businesses are Manuka Millionaires. We don't all have consultants and lots of admin people working behind the scenes. Was offered a computer programme the other day to help our administration (would only cost \$3000 a year) – that's a lot of our over priced honey, especially when production is down 70% like this year. Flawed Tracking system won't bring in the money to pay for varroa treatment and sugar.



Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

The Ministry for Primary Industries (MPI) proposes to consolidate, clarify, and introduce export requirements for all bee products intended for export.

You are invited to have your say on the proposed changes, which are explained in the discussion document and specified in the draft Animal Products Notice: General Export Requirement for Bee Products notice.

Consultation closes on **23 May 2017**.

How to have your say

Have your say by answering the questions in the discussion document, or commenting on any part of the proposals outlined in the draft Animal Products Notice: General Export Requirements for Bee Products. This submission form provides a template for you to enter your answers to the questions in the discussion document and email your submission back to MPI.

Please include the following information in your submission:

- ☐ the title of the discussion document 'Proposed General Export Requirements for Bee Products';
- ☐ your name and title;
- ☐ your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it; and
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Your details

Your name and title:	s 9(2)(a)
Your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it:	s 9(2)(a)
Your contact details (such as phone number, address, and email):	s 9(2)(a)

General questions: getting to know you

1. What part of the supply chain do you operate in:
 - ☐ beekeeper
 - ☐ extractor
 - ☐ processor
 - ☐ packer
 - ☐ exporter
 - ☐ retailer of bee products
 - ☒ other – Honey authentication scientist
2. How long have you been involved in the apiculture industry:
 - ☐ 0-5 years
 - ☐ 5-10 years
 - ☒ 10 + years
 - ☐ not applicable
3. Do you operate under:
 - ☐ an RMP under the Animal Products Act 1999
 - ☐ the Food Act 2014 (Food Control Plan or National Programme)
 - ☐ the Food Hygiene Regulations
 - ☒ none of these
 - ☐ not applicable
4. If you are a beekeeper, how many hives do you currently have:
 - ☐ 0 – 5
 - ☐ 6 – 50
 - ☐ 51 – 500
 - ☐ 501 – 1000
 - ☐ 1001 to 3000
 - ☐ More than 3000
5. What region of New Zealand do you operate in?

6. If you export bee products please tell us a little about your business. How many people do you currently employ?

- ☐ 0
☐ 1 – 5
☐ 6 – 19
☐ 20 or more

What are the roles of your employees and how many are:

- ☐ beekeepers
☐ processors
☐ packers
☐ other – please specify

Impact of compliance costs for beekeepers, processors and exporters

7. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

-

8. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exports of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

-

9. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be (e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

-

No additional substances to be present in New Zealand honey

10. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☐ I agree because:

-

☐ I disagree because:

-

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

-

11. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☐ I agree because:

-

☐ I disagree because:

-

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

-

Processors of bee products to operate under a risk based measure

12. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

☐ I agree because:

-

☐ I disagree because:

-

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

-

Bee products to be sourced from listed beekeepers

13. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

-

☐ I disagree because:

-

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

-

Pre-processing traceability requirements

14. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☐ I agree because:

-

☐ I disagree because:

-

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

-

15. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

-

Traceability from beekeepers to operators – harvest declarations

16. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

-

☐ I disagree because:

-

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

-

17. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☐ I agree because:

-

☐ I disagree because:

-

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

18. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☐ I agree because:

-

☐ I disagree because:

-

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

-

Labelling of monofloral and multifloral mānuka honey

19. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☐ I agree because:

-

☐ I disagree because:

-

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

-

20. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☐ I agree because:

-

☐ I disagree because:

-

☐ I have concerns because:

-

21. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☐ I agree because:

-

☐ I disagree because:

-

22. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☐ I agree because:

-

☐ I disagree because:

-

23. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

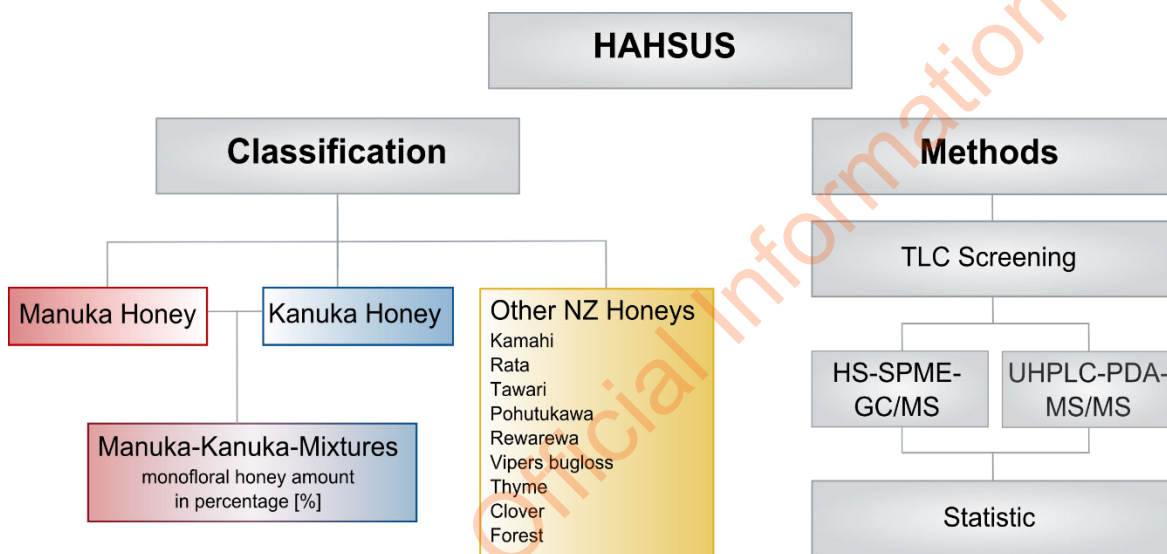
-

24. Do you have any comments on the summary science report?

To our relief the MPI has carried out scientific research regarding the authentication of the genuine Manuka honey, and has now been able to present a proposal for classification criteria. Our study group has been doing research on this topic for many years (e. g. Oelschlaegel et al. *J Agric Food Chem.* 2012, 60, 7229-7237; Beitlich et al. *J Agric Food Chem.* 2014, 62, 6435-6444; Beitlich et al. *J Agric Food Chem.* 2016, 64, 8886-8891, Beitlich, *Apimedica & Apiquality, Rome.* 2016: https://www.chm.tu-dresden.de/lc3/dateien/manuka_kanukahonig.pdf). Therefore, we would like to inform you that in our opinion some of the criteria described in the draft paper will not make a contribution to the avoidance of Manuka honey fraud but rather to its promotion:

Parallel to the Manuka Honey Science Programme organized by the MPI, the UMFHA has carried out its own scientific studies to develop criteria for the authentication of genuine Manuka honey in cooperation with our working group. Within the scope of analyzing a large number of pure Manuka, Kanuka, and other floral honeys from New Zealand, the HAHSUS method (Manuka Honey Authentication by **HS**-SPME-GC/MS and **UHPLC**-PDA-MS/MS combined with **Statistics**) was developed. The method allows for the classification of Manuka honeys, Kanuka honeys, Manuka/Kanuka mixtures as well as other New Zealand honeys. After TLC screening, the two robust, independently working chemical analyzing techniques reinforce correct classification.

HAHSUS method



A classification into monofloral- and multifloral is possible in the same way as a specification of the Manuka part in percent and, thus, a declaration of the composition of a mixture (multifloral). At present, a monofloral Manuka honey has been defined by our working group to contain $\geq 70\%$ Manuka; however, it is relative easy to adopt the method to another minimum requirement such as, for example, 60%.

HAHSUS versus criteria of the Manuka Honey Science Programme

Honeys (n=119) from the UMFHA study were classified by the HAHSUS method and by the MPI criteria. The results are presented in Table 1:

Table 1: Comparison of honey classification using HAHSUS and MPI criteria

HAHSUS (§ 9(2)(a))	MPI criteria
manuka (n = 64) (= monofloral manuka honey)	n = 62 monofloral manuka, n = 2 multifloral manuka honey
manuka-kanuka-mixtures (n = 17) (= multifloral manuka honey)	n = 15 monofloral manuka n = 1 multifloral manuka honey n = 1 non manuka honey
kanuka (n = 25) (= non manuka honey)	n = 5 monofloral manuka n = 20 non manuka honey
multifloral (n = 9) (= non manuka honey)	n = 8 multifloral manuka n = 1 monofloral manuka

Results of the classification:

Accordance:

Monofloral Manuka honeys:

The results are largely in accordance using the HAHSUS method or the MPI criteria

Differences:

Multifloral Manuka honeys:

Multifloral Manuka honey classified by HAHSUS were classified mainly as monofloral Manuka using the MPI criteria

Interestingly, honeys with a higher part of kanuka were classified as monofloral Manuka honey, and honeys with a higher part of Manuka were classified as multifloral Manuka honey

Monofloral Kanuka honeys:

Using the MPI criteria, 20% of the kanuka honeys were classified as monofloral Manuka honeys

Multifloral honeys:

Using the MPI criteria, 8 of 9 multifloral honeys were classified as multifloral Manuka honeys

The MPI criteria for multifloral Manuka honey will promote fraud

The range for 3-phenyllactic acid with minimum quantities of 400 mg/kg Monofloral (20 mg/kg minimum amount = multifloral) leads to the following admission: 400 mg/kg = 100% Manuka, then 20 mg/kg represents 5%. Using the MPI criteria, a honey containing only 5% Manuka is assigned to the group of multifloral Manuka honeys.

In our opinion, such a classification is more than dubious.

Our HAHSUS method assigns these honeys to other monofloral honeys due to their DAD-profiles.

Profile analyses for characterization of Manuka honeys are necessary

The proposed MS/MS-method by the MPI detecting only 4 substances is inadequate, especially when these substances can be bought for little money. It is thus possible to add the chosen compounds to any honey and, in this way, promote honey fraud. Assuming the worst case, the MPI criteria will designate a sugar solution with the 4 substances + pollen as a **monofloral Manuka honey**.

These examples prove that there is a need for analyzing the DAD profiles and for further support of the HS-SPME-GC/MS profiles to avoid honey fraud. Employing the DAD profile in addition to the chosen marker substances by the MPI and the substances regarded in the HAHSUS method, many other nonvolatile secondary plant compounds are additionally detectable. The data of these compounds need to be correlated to increase and to assure the quality of Manuka honey for both, the consumer and the trade.

> The HAHSUS method considers all these aspects.

The procedure for incorporating and establishing the HAHSUS method in a new laboratory is quick and uncomplicated. It only needs analytical equipment!

Selection of substances:

The MPI's criteria include only substances described in the literature up to 2014. In the last years, a number of new marker substances for Manuka honey classification have been reported (e. g. Beitlich et al. *J Agric Food Chem.* 2016, 64, 8886-8891; Daniels et al. *J Agric Food Chem.* 2016, 64, 5079-5084). 6,7-Dimethylpteridin-2,4(1*H*,3*H*)-dion and 3,6,7-Trimethylpteridin-2,4(1*H*,3*H*)-dion, two fluorophores, are very helpful for screening honeys. Our TLC screening method as well as the screener method (ManukaMeter) presented by Stephens et al. is useful.

In our working group, we have a number of quantitative data in reference to these substances, and we also have the standard substances.

4-hydroxyphenyllactic acid

The analysis of this compound in Manuka honey evades us. Is there any reason for considering this substance, and is there any link to the literature?

Sample clean-up

The LC-MS/MS analysis without clean up may influence the ionization of the marker substances, in consequence, an enhancement or suppression is possible. We recommend a separation of the sugars due to the fact that most of the substances to be analyzed are minor compounds.

25. Do you have any further comments regarding the definition of mānuka honey?

-

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☐ I agree because:

-

☐ I disagree because:

-

27. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

-

Do you have any suggestions for minimising any impacts?

-

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☐ I agree because:

-

☐ I disagree and propose an alternative timeframe:

-

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

☐ I agree because:

-

☐ I disagree because:

-

Any other feedback

30. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).

-

Submission on Manuka honey definition

From

s 9(2)(a)

owner of s 9(2)(a)

- operate 500 hives
- contract extractor
- 25 years beekeeping experience

I have some concerns regarding your proposed manuka honey definition.

- Significant amounts of high grade honey (umf15 and up) seems to be failing.
- I feel leptosperin and methylglyoxal should be included as they are proven to be reliable markers of manuka honey that are accepted by the industry and consumers alike. even though mgo changes over time there should still be a minimum amount needed.
- overtime more and more low grade honey has been accepted as manuka to the point that some manuka which is presented to me for extraction doesn't need pricking. this low grade honey erodes the value of "real" manuka and i don't think your definition does enough to address this issue. Even manuka blend (multifloral manuka) needs to have enough manuka in it to taste and look like manuka.
- Personally i think that multifloral manuka should have at least 50 mgo and 80 leptosperin and monofloral manuka should have at least 200 mgo and 150 leptosperin.
- while i think that your level of 3PLA required to meet monofloral standard is about right it concerns me that the level is so much lower for multifloral allowing the manuka name onto some very low grade honey

-i am very concerned that the only difference between monofloral manuka and multifloral manuka is the level of just ONE key marker, 3PLA. This to me encourages adulteration especially as 3PLA is a chemical that you can buy.

-Finally i support the views of Apiculture New Zealand on this topic and believe that they represent the majority of beekeepers in nz.

-I would like to see you work with Apiculture New Zealand to develop a strong standard for maunka honey as it is very much needed and long overdue.

Regards

s 9(2)(a)

12 June 2017

Released Under the Official Information Act 1982



Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

The Ministry for Primary Industries (MPI) proposes to consolidate, clarify, and introduce export requirements for all bee products intended for export.

You are invited to have your say on the proposed changes, which are explained in the discussion document and specified in the draft Animal Products Notice: General Export Requirement for Bee Products notice.

Consultation closes on **23 May 2017**.

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Have your say by answering the questions in the discussion document, or commenting on any part of the proposals outlined in the draft Animal Products Notice: General Export Requirements for Bee Products. This submission form provides a template for you to enter your answers to the questions in the discussion document and email your submission back to MPI.

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MPI encourages you to make your submission electronically if possible. Please email your submission to: manuka.honey@mpi.govt.nz

If you wish to make your submission in writing, these should be posted to the following address:

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General questions: getting to know you

1. What part of the supply chain do you operate in:

☒ x beekeeper

☒ x extractor

☐ processor

☐ packer

☐ exporter

☐ retailer of bee products

☐ other – please specify

2. How long have you been involved in the apiculture industry:

☐ 0-5 years

☐ 5-10 years

☒ x 10 + years

☐ not applicable

3. Do you operate under:

☒ x an RMP under the Animal Products Act 1999

☐ the Food Act 2014 (Food Control Plan or National Programme)

☐ the Food Hygiene Regulations

☐ none of these

☐ not applicable

4. If you are a beekeeper, how many hives do you currently have:

☐ 0 – 5

☐ 6 – 50

☒ x 51 – 500

☐ 501 – 1000

☐ 1001 to 3000

☐ More than 3000

5. What region of New Zealand do you operate in?

Bay of plenty, Hawkes Bay, Central platau

6. If you export bee products please tell us a little about your business. How many people do you currently employ?

☐ 0

x 1 – 5

☐ 6 – 19

☐ 20 or more

What are the roles of your employees and how many are:

2 beekeepers

2 processors

☐ packers

☐ other – please specify

Impact of compliance costs for beekeepers, processors and exporters

7. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

As a small business any added compliance costs weigh heavily on us, however i don't see any significant changes here as we already operate under rmp

8. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exports of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

Additional paper work

9. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be (e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

Not significant

No additional substances to be present in New Zealand honey

10. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

New zealands changable weather means some times hoves need feeding right up to the honeyflow

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

Good hive management where food stores and food needs are assesed for each individual hive on a regular bassis by a confident and experienced beekeeper is the best way to ensure excess sugar does not get into honey.
Honey and sugar are moved around the hive ie sugar stored in broodnest is moved up into honey supers added later so the proposal will not achieve its target. Would be better to regulate beekeepers ie not allowed to own or operate hives untill you have 3 years experience as beekeepers assistant.

11. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☐ I agree because:

x I disagree because:

Should be allowed upto 10 % broodcomb so issue is minimised while still allowing beekeeping practises around swarm control and comb replacement to happen. Also not all miteicides work the same ie formic acid and you would need to allow for this.

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

Minimising the use of brood combs for honey collection, timing of treatment, alternating treatments to minimise exposure to any one chemical.

Processors of bee products to operate under a risk based measure

12. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

x I agree because:

All honey processing should be controlled for honey that is to be sold so risks to consumers and industry is reduced.

☐ I disagree because:

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

na

Bee products to be sourced from listed beekeepers

13. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

☒ I disagree because:

Beekeepers operating a RMP should be exempt

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

Pre-processing traceability requirements

14. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☒ I agree because:

While a harvest statement covers honey on a hive there is a big gap between hive and RMP premise, harvesting, transport of supers, storage of supers is not currently controlled.

☐ I disagree because:

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

15. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

Traceability is needed from site to rmp, the current harvest dec does this satisfactory but does not address the conditions along the way. Traceing to a box level would be a waist of time as batches of honey are processed as one lot.

Traceability from beekeepers to operators – harvest declarations

16. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☒ I agree because:

It standadises the industry

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

17. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☒ I agree because:

We already produce harvest decs

☐ I disagree because:

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

18. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☒ I agree because:

E cert is a good system that we are already using

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Labelling of monofloral and multifloral mānuka honey

19. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☒ I agree because:

The industry desperately needs a manuka standard

☐ I disagree because:

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

20. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☒ I agree because:

☐ I disagree because:

☐ I have concerns because:

21. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☐ I agree because:

☐ I disagree because:

22. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☒ I agree because:

Manuka honey needs to be graded and the curent systems work and are accepted by industary

☐ I disagree because:

23. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

There should be no effect on good gradeing systems, umf and mgo

24. Do you have any comments on the summary science report?

25. Do you have any further comments regarding the definition of mānuka honey?

Should include leptospumim and mgo as these are already accepted by the industry and customers and are a really good measure of manuka

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☐ I agree because:

☐ I disagree because:

27. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

The cost of testing will be insignificant in the big picture

Do you have any suggestions for minimising any impacts?

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree and propose an alternative timeframe:

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

Any other feedback

30. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).

I fully support the views of Apiculture NZ and feel that they should be working alongside MPI to achieve an outcome that will protect the industry and consumers.



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Your name and title:	s 9(2)(a) [Redacted]
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Your contact details (such as phone number, address, and email):	s 9(2)(a) [Redacted] [Redacted]

General questions: getting to know you

1. What part of the supply chain do you operate in:

- ☒ beekeeper
- ☐ extractor
- ☐ processor
- ☐ packer
- ☐ exporter
- ☐ retailer of bee products
- ☐ other – please specify

2. How long have you been involved in the apiculture industry:

- ☐ 0-5 years
- ☐ 5-10 years
- ☒ 10 + years
- ☐ not applicable

3. Do you operate under:

- ☒ an RMP under the Animal Products Act 1999
- ☐ the Food Act 2014 (Food Control Plan or National Programme)
- ☐ the Food Hygiene Regulations
- ☐ none of these
- ☐ not applicable

4. If you are a beekeeper, how many hives do you currently have:

- ☐ 0 – 5
- ☐ 6 – 50
- ☐ 51 – 500
- ☐ 501 – 1000
- ☐ 1001 to 3000
- ☒ More than 3000

5. What region of New Zealand do you operate in?

waikato

6. If you export bee products please tell us a little about your business. How many people do you currently employ?

☐ 0

☐ 1 – 5

☐ 6 – 19

☒ 20 or more

What are the roles of your employees and how many are:

☒ beekeepers

☒ processors

☒ packers

☐ other – please specify

Impact of compliance costs for beekeepers, processors and exporters

7. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

Time and money spent to no increased value of product, as we already trace honey back at an apiary level I see no need to go back to individual supplier level, the practicality of traceability to the supplier level is stupid

8. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exporters of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

More staff to achieve this with no more productivity plus new systems to be paid for that aren't needed for working hives

9. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be (e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

It will put limitations on what we can spend our money on and take time away from working the bees, we need all available resources going into our hives to produce the honey not spending 100,000 plus on something that's doesn't add any value to the operation or proudct

No additional substances to be present in New Zealand honey

10. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☒ I agree because:

Ultimately honey is tested and this controls the honey that can be used for export so think that most will avoid feeding at all costs other than hive health we do what's best for them. In regards to feeding sugar

☐ I disagree because:

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

11. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☒ I agree because:

testing for Varroacides as a standard in honey will prevent people from doing that

☐ I disagree because:

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

Processors of bee products to operate under a risk based measure

12. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

☒ I agree because:

Think all beekeeping operations should be apart of either one

☐ I disagree because:

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

Bee products to be sourced from listed beekeepers

13. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☒ I agree because:

Stopping the cowboys out there getting them to tow the line make it easy not listed you cant sell your honey anywhere export or domestic I feel

☐ I disagree because:

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

Pre-processing traceability requirements

14. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☒ I agree because:

I agree with apiary site level

☒ I disagree because:

With the supper traceability, as is not practical, cost.

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

15. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

We do all but the supper level and works now for us there is no gain to be had by going down to the super level

Traceability from beekeepers to operators – harvest declarations

16. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☒ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

17. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☐ I agree because:

☒ I disagree because:

it depend on what dollar amount is high or low, 1000 dollars will be high in one operation and low in another this will in no shape or form be this little

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

18. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☒ I agree because:

But should be for domestic as well. Stop the cheats

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Labelling of monofloral and multifloral mānuka honey

19. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

We need a set standard to protect manuka brand have you done this with grex it is debateable as our highest quality has failed so how is that??

20. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☐ I agree because:

☐ I disagree because:

☒ I have concerns because:

It should be for all no some do some don't otherwise we haven't achieved anything

21. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☐ I agree because:

☐ I disagree because:

22. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☐ I agree because:

☒ I disagree because:

all honey should be under one under one system

23. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

Well its killed the top end range manuka so how is that a good thing 20umf failed your Manuka definition I'd say that is rather a negative effect wouldn't you?

24. Do you have any comments on the summary science report?

25. Do you have any further comments regarding the definition of mānuka honey?

I don't believe you have fixed anything

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☒ I agree because:

☐ I disagree because:

27. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

Cost per sample, batch testing

Do you have any suggestions for minimising any impacts?

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☒ I agree because:

☐ I disagree and propose an alternative timeframe:

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

☒ I agree because:

I believe this is fair

☐ I disagree because:

Any other feedback

30. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).



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For more information please visit <http://www.ombudsman.parliament.nz/resources-and-publications/guides/official-information-legislation-guides>

Your details

Your name and title:	s 9(2)(a)
Your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it:	
Your contact details (such as phone number, address, and email):	s 9(2)(a)

General questions: getting to know you

1. What part of the supply chain do you operate in:
 - ☒ beekeeper
 - ☐ extractor
 - ☐ processor
 - ☐ packer
 - ☐ exporter
 - ☐ retailer of bee products
 - ☐ other – please specify
2. How long have you been involved in the apiculture industry:
 - ☐ 0-5 years
 - ☐ 5-10 years
 - ☒ 10 + years
 - ☐ not applicable
3. Do you operate under:
 - ☐ an RMP under the Animal Products Act 1999
 - ☐ the Food Act 2014 (Food Control Plan or National Programme)
 - ☐ the Food Hygiene Regulations
 - ☒ none of these
 - ☐ not applicable
4. If you are a beekeeper, how many hives do you currently have:
 - ☐ 0 – 5
 - ☐ 6 – 50
 - ☐ 51 – 500
 - ☒ 501 – 1000
 - ☐ 1001 to 3000
 - ☐ More than 3000
5. What region of New Zealand do you operate in?

Western North Island

6. If you export bee products please tell us a little about your business. How many people do you currently employ?

☐ 0

☒ 1 – 5

☐ 6 – 19

☐ 20 or more

What are the roles of your employees and how many are:

☒ beekeepers

☐ processors

☐ packers

☐ other – please specify

Impact of compliance costs for beekeepers, processors and exporters

7. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

At this point I can see any honey we test as Manuka or Manuka blend costing around \$1000 per drum to be able to present to potential purchasers.

If all these proposals are enforced we will have to employ more staff

8. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exports of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

Most of these proposals will add extra costs to our business

9. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be (e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

Yes and fairly significant

No additional substances to be present in New Zealand honey

10. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

In the areas where our hives are situated Honey flows can start as early as late September or as late as mid January if they start at all. We need to be able to feed at any time the bees need feeding and that includes the provision of a pollen supplement as some flows do not produce sufficient quality pollen to sustain the maximum health of the bee colony

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

Most packers I have approached to purchase our honey do C4 tests to ensure they only buy compliant honey

11. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

If the honey flow is slow the brood nest can move anywhere in the hive, and as the hive fills with honey the brood nest will be pushed back down to the lower boxes and the frames in the honey supers that have had brood in then get filled with honey, which under the proposed new rule will not be able to be extracted as they been part of brood nest.

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

Processors of bee products to operate under a risk based measure

12. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

Bee products to be sourced from listed beekeepers

13. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

Pre-processing traceability requirements

14. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☐ I agree because:

☒ I disagree because:

The individual identification of honey supers is totally unnecessary as we do not process and package for sale by the honey super, depending on the honey flows anywhere from 12 to 25 honey supers could be needed to fill a 300kg drum with honey which is the industry standard ,so that's a lot of extra work to track each super to the drum .

We already keep records of how many supers are in each apiary site and how many supers of honey are harvested from each apiary site and as we batch extract we can trace each drum of honey back to the apiary or apiaries that the honey was extracted from.

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

Just require beekeepers to keep records of the dates and number of honey supers placed on hives and then dates and number of boxes removed for extraction, and record drum numbers for each apiary site.

15. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

More staff , Higher extraction costs

Traceability from beekeepers to operators – harvest declarations

16. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☒ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

17. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☐ I agree because:

☒ I disagree because:

As noted before it will mean we will have to employ more staff and as we predominantly produce pasture and bush honey and on a comparative basis that means higher costs compared to the Manuka bludgers

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

18. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Labelling of monofloral and multifloral mānuka honey

19. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

20. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☐ I agree because:

☐ I disagree because:

☐ I have concerns because:

21. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☐ I agree because:

☐ I disagree because:

22. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☐ I agree because:

☐ I disagree because:

23. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

Your Manuka grading system will make some honeys that have genuine mgo activity from Manuka Unable to be sold as active Manuka, or Manuka blend . These lower grade honeys should still be able to be marketed as having activity from Manuka in some way, there is a market for these lower grade Manuka blends and the industry should still be able to access this market using the word Manuka as part of the label

24. Do you have any comments on the summary science report?

25. Do you have any further comments regarding the definition of mānuka honey?

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☐ I agree because:

☐ I disagree because:

27. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

Do you have any suggestions for minimising any impacts?

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree and propose an alternative timeframe:

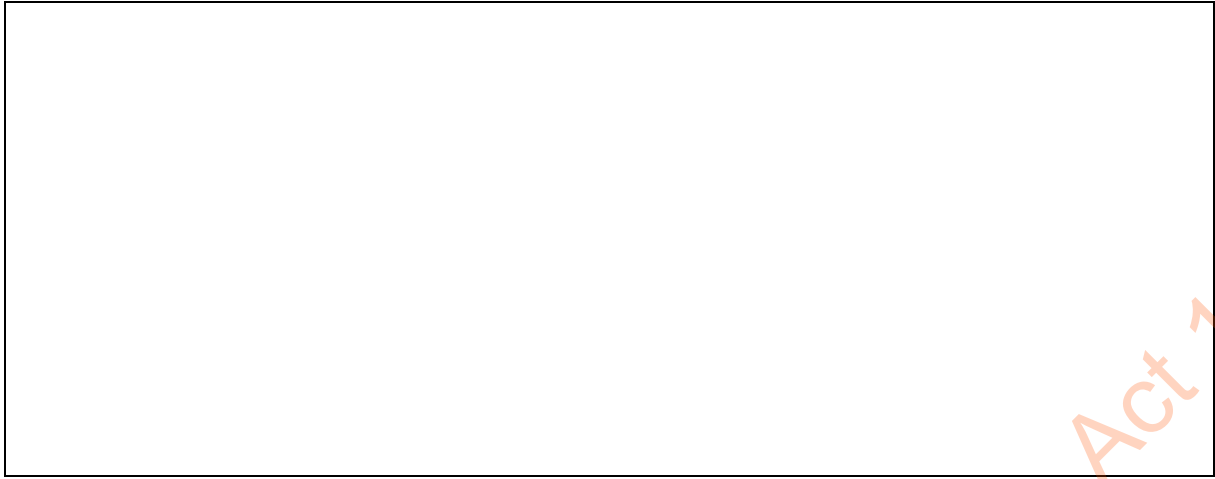
29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

Any other feedback

30. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).





Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

The Ministry for Primary Industries (MPI) proposes to consolidate, clarify, and introduce export requirements for all bee products intended for export.

You are invited to have your say on the proposed changes, which are explained in the discussion document and specified in the draft Animal Products Notice: General Export Requirement for Bee Products notice.

Consultation closes on **23 May 2017**.

How to have your say

Have your say by answering the questions in the discussion document, or commenting on any part of the proposals outlined in the draft Animal Products Notice: General Export Requirements for Bee Products. This submission form provides a template for you to enter your answers to the questions in the discussion document and email your submission back to MPI.

Please include the following information in your submission:

- ☐ the title of the discussion document 'Proposed General Export Requirements for Bee Products';
- ☐ your name and title;
- ☐ your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it; and
- ☐ your contact details (such as phone number, address, and email).

MPI encourages you to make your submission electronically if possible. Please email your submission to: manuka.honey@mpi.govt.nz

If you wish to make your submission in writing, these should be posted to the following address:

General Export Requirements for Bee Products Submission
MPI Food Assurance Team
PO Box 2526
Wellington 6140

The following points may be of assistance in preparing comments:

- ☐ where possible, comments should be specific to a particular section in the document. All major sections are numbered and these numbers should be used to link comments to the document;
- ☐ **where possible, reasons and/or data to support comments should be provided;**
- ☐ the use of examples to illustrate particular points is encouraged; and
- ☐ as a number of copies may be made of your comments, please use a legible font and quality print, or make sure hand-written comments are clear in black or blue ink.

Submissions are public information

Everyone has the right to request information held by government organisations, known as “official information”. Under the Official Information Act 1982, information is to be made available to requesters unless there are good or conclusive grounds under the Official Information Act for withholding it.

If you are submitting on this discussion document, you may wish to indicate any grounds for withholding information contained in your submission. Reasons for withholding information could include that information is commercially sensitive, or that the submitters wish personal information such as names or contact details to be withheld. MPI will consider such grounds when deciding whether or not to release information.

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Your details

Your name and title:	s 9(2)(a)
Your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it:	s 9(2)(a)
Your contact details (such as phone number, address, and email):	s 9(2)(a)

General questions: getting to know you

1. What part of the supply chain do you operate in:
☐ beekeeper
☐ exporter
2. How long have you been involved in the apiculture industry:
☐ 10 + years

☐ Do you operate under:
☐ an RMP under the Animal Products Act 1999
3. If you are a beekeeper, how many hives do you currently have:
☐ 501 – 1000
4. What region of New Zealand do you operate in?

Lower North Island

5. If you export bee products please tell us a little about your business. How many people do you currently employ? Not applicable

Impact of compliance costs for beekeepers, processors and exporters

6. Table 4.1.1 of the Discussion Document provides a summary of the estimated costs of the proposals. What do you think the overall impact of the new proposals will be on your business?

This will be a huge cost to my business as my honey is extracted under contract and the contractor is going to pass all costs onto me – testing, record keeping, traceability, ecerts.

7. In order to estimate the total cost to industry of the proposals contained in the draft GREX, it would be useful for MPI to understand how many beekeepers, operators and exports of bee products will be affected by the proposals. Please specify which of the proposals listed in the table at 4.1.1 will affect you and how.

All processes will no doubt have a flow on effect which will increase my costs significantly.

8. Do you foresee any other costs that will arise from the proposals contained in the draft GREX which are not contained in the table at 4.1.1? If so, how significant do you think these will be (e.g. administration costs such as time to fill in forms, and time to learn about the new requirements)?

You are asking questions that you want answered to suit you, not questions and answers that you don't want to hear.

No additional substances to be present in New Zealand honey

9. To ensure additional substances are not present in New Zealand honey, MPI proposes to prohibit the feeding of bees when honey supers are present on hives for the purpose of collecting honey, with an exception if it is necessary for the survival of the bees. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

Honey is tested for C4 sugars before being sold. It is already a requirement. There is no information on the origins of C4 contamination in honey that is being tested overseas. Most of the contamination is happening once the honey has left the country by buyers adding cornsyrup in the packing process. It is impossible to know when the honey flow is going to start. One minute the bees are starving, the next minute they can be on a honey flow. It is not practical to say just because the honey supers are on we are not allowed to feed. Over feeding is normally picked up with testing for C4 sugars and is very costly if due to rejected batches and contamination so no beekeeper would deliberately overfeed. How is it going to be policed??

Please suggest any alternatives to this approach that would ensure additional sugars and synthetic chemicals are not present in the honey:

Most beekeepers are dealing with a high value product and have no intention of jeopardising the honey and having it rejected /condemned because of residues ,or C4 sugars.
Most honey is tested for these before being sold and /or the buyer requires the testing before purchasing !!
You MPI do residue testing, continue your programme; but Please give/ allow access to the results and follow up with more testing of honey that is causing issues.

10. To prevent the contamination of honey with varroacide residues, MPI proposes honey is only harvested from honey supers that do not contain honeycomb previously part of a brood nest. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

Are you MPI going to rewrite every beekeeping book/ manual in the world ?????
It is standard beekeeping practise to lift brood frames up for swarm control or to replace damaged or old combs. Another issue is the use of plastic frames. These are not being replaced and cleaned because of the difficulty of actually cleaning these frames so they are staying longer in the broodboxes for this reason, allowing for greater contamination. Chemical control of varroa, organic or synthetic, will eventually become ineffectual due to resistance and more emphasis and money needs to be placed on breeding hygienic bees. Some beekeepers do not use queen excluders at all, so how do you define brood boxes when the queen can freely move between all boxes?

Please suggest any alternatives to this approach that would ensure varroacide residues are not present in the honey.

Processors of bee products to operate under a risk based measure

11. MPI proposes that processors of bee products for export under the Food Hygiene Regulations must move to a risk-based measure (either an RMP under the Animal Products Act 1999, or Food Control Plan or National Programme under the Food Act 2014). Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

You are going to drive the small beekeepers underground or out of business because of the bureaucracy and the costs involved.

Please suggest any alternatives to this approach that would provide MPI with oversight of these processors:

Do MPI need oversight if there are no official assurances? What is the risk and volume of honey involved?

Bee products to be sourced from listed beekeepers

12. MPI proposes to extend listing requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

If MPI made harvest declarations an online process as opposed to a paper trail, they would have all the fact and information that they need as well as traceability. Just another cash cow for MPI.

Can you think of any alternatives to this approach that would address this gap in the traceability chain?

Make bekeepers provide harvest declarations online linking in with their AFB/PMP registration code, their geocodes and their boxes harvested. This could be done at the registered premise of the RMP operator where the honey is to be extracted. Allow the RMP operator access to submit on this form inputs such as batch IDs and tutin and other test results. This can be linked to the Ecert for end to end traceability. If you did this many of the proposals in this submission would be redundant and you would have a national data base of honey yeilds and full traceability.

Pre-processing traceability requirements

13. MPI proposes beekeepers keep additional records. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

This is an impossibility. These suggestions can only have been made by someone who has no idea of how beekeeping is done in the real world. Even those large companies who purportedly keep track of their boxes with barcodes etc are only as good as the operator at the time. What the CEO's and bosses are saying / telling you and what the workers are doing are poles apart. It's like asking a dairy farmer to identify milk back to each quarter of a cow. Absolutely mission impossible.

As a beekeeper I do not have honey boxes as such. All boxes must rotate through my system and can be used as anything from a brood box, honey box, nuc box or queen rearing box. Who is going to police it? What computer program would be able to handle such a system? As a person who has my honey extracted under contract, I get charged per box. I make sure that the boxes going to the RMP factory are full. Therefore I take frames from different boxes to make full boxes. It would be a logistic nightmare to try and trace all of this. The harvest declaration gives traceability of the number of full boxes taken from each apiary.

Can you think of any alternatives to this approach that would address gaps in the traceability chain?

Move harvest declarations on line and link these to Ecerts. See previous comments above.

14. The costs for businesses associated with implementing the proposed traceability requirements are likely to vary depending on their existing systems and processes. What impact do you think these proposals are likely to have on your business?

Totally unworkable. This would put me and most other small beekeepers out of business because of stupidity.

Traceability from beekeepers to operators – harvest declarations

15. MPI proposes to introduce harvest statement requirements to all beekeepers providing bee products for export. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

The costs for implementing traceability as are proposed are excessive, provide limited value and at an RMP level completely unworkable without further work, they are poorly focused and it is unclear as to what the objective is that couldn't be achieved with a simple form.

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Develop an Ecert system that meets the requirements of the industry.

16. MPI considers, for most businesses, the costs associated with these proposals are unlikely to be onerous. Do you agree or disagree and why?

☐ I agree because:

☐ I disagree because:

Everything costs money and time and it depends on how much unnecessary information is required.
Total stupidity by a bunch of bureaucrats.

Traceability between operators – transfer documentation in AP E-Cert and reconciliation

17. MPI proposes to introduce transfer documentation requirements to all bee products intended for export. Do you agree or disagree?

☐ I agree because:

I agree to a degree with the proviso that everything is done online via Ecert, starting with the harvest declaration. You need to change the system. It is cumbersome and not fit for the purpose and not user friendly.
Designed by idiots.

☐ I disagree because:

Can you think of any alternatives to this approach that ensure full traceability through the bee product supply chain?

Labelling of monofloral and multifloral mānuka honey

18. MPI proposes to implement the mānuka honey definition for export using the GREX. Do you agree or disagree?

☐ I agree because:

☐ I disagree because:

The definition of Manuka should NOT be in the GREX. It should be its own living document along with other honey type definitions.

I have no problem with having a scientific sound definition

Your science is wrong. Two of your chemical markers are unreliable as they allow other non-manuka honeys to pass. As for the DNA of the pollen, your analysis and use of this is never going to work.

The only reason that you MPI have persisted with your so-called definition is that you collect royalties from every test that beekeepers / packer / exporter have done. Again another money making scheme CLIP the ticket!!!!

You missed the boat. The UMF group have a definition that has been accepted overseas by the Chinese. And it is a true robust definition of Manuka. Even if the definition is mandated there is a very strong possibility that some of the overseas markets will reject it. I also hear on national radio on rural report that Professor Peter Dearden from Otago University has developed a DNA test that accurately identifies Manuka.

Why have you not approached the University originally to come up with a true definition????

Can you think of any alternatives to this approach that ensures mānuka honey is true to label?

Stop being bureacrat dick heads and negotiate a deal with either the UMF group or the Otago University. Then the industry will have a definition that truly represents Manuka.

19. MPI considers there are likely to be options available to businesses to support compliance with the proposed definition (e.g. relabelling, changes to blending practices etc.). Do you agree with this assessment or do you have concerns about ability of some businesses to comply?

☐ I agree because:

☐ I disagree because:

I don't see how beekeepers / businesses can comply with these stupid requirements . The science is flawed and the so called tracability of boxes is totally unworkable and impractical and will never happen !!!

☐ I have concerns because:

20. MPI's proposal may have an impact on existing rights associated with using the word "mānuka" on labels, including registered trademarks. Do you agree with MPI's assessment of the impact on existing rights?

☐ I agree because:

The word Manuka is a generic word originally used by New Zealands indigenous people to describe a native plant and is now used by every New Zealander in this way. It is something that should only used to identify honey and other products that come from that New Zealand plant. The word manuka cannot be patented or restricted for private or public business use.

☐ I disagree because:

21. MPI does not propose to make changes to the current use of grading systems. Do you agree or disagree with this position?

☐ I agree because:

☐ I disagree because:

22. What do you think the impact of the mānuka honey definition will be on the current use of grading systems?

The MPI so called definition of Manuka is causing a huge amount of uncertainty and confusion in the industry here in New Zealand and overseas. The tests are not working and as for the so called traceability, this is never going to be achieved as it is unworkable.

23. Do you have any comments on the summary science report?

The MPI scientists have missed the boat. The UMF group have already got a scientific test for the markers that truly identify manuka and is acceptable overseas. MPI are hellbent on having a test of their own so they can clip the ticket and make money rather than paying royalties or whatever for someone else's test. They didn't even consider using one of the top geneticists in the world – Peter Deardon – to come up with a DNA test. He has now done this and is now going out to the industry and making it a cheap reality.

24. Do you have any further comments regarding the definition of mānuka honey?

Laboratory Tests

25. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

☐ I agree because:

☐ I disagree because:

You are now saying that the sampling methods RMP operators now do for tutin testing and 3 in 1 testing are not acceptable for new testing for manuka. Why not? It is already homogenised so nothing changes.

26. The costs associated with these proposals are likely to vary depending on the size and volume of samples being tested. What impact do you consider these proposals will have on your business?

Do you have any suggestions for minimising any impacts?

Transitional provisions

27. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree and propose an alternative timeframe:

The definition of manuka is not clear enough and there are large inventories of honey sitting around. People are unsure whether they will be able to sell it. You have had a major effect on the honey industry and the livelihoods of many beekeepers and 6 months is way too short. Plus, regarding the use of your so-called markers, there is no consideration given to how these markers behave with aging and what influence they have on the overall definition of manuka.

28. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

☐ I agree because:

☐ I disagree because:

There are many aspects of this proposal that will take years to implement.

Any other feedback

29. Are there any other parts of this discussion document or the draft GREX that you would like to provide feedback on? (Please indicate which part of the discussion document or draft GREX you are providing feedback on).

Everytime there is a non-tariff trade barrier MPI do not fight for whatever industry is affected. MPI see it as an opportunity –

To make money.

To create a bigger empire and employ more people.

In this case testing and compliance costs will be added to the ever-increasing barriers being placed on beekeepers to earn a living.

MPI places so many stupid restrictions on industries that no other countries in the world have or comply with. They should be fighting for NZ industries, not creating a cash cow and a pile more bureaucracy.

s 9(2)(a)



s 9(2)(a)



General Export Requirements for Bee
Products Submission
MPI Food Assurance Team
PO Box 2526
Wellington 6140
E: manuka.honey@mpi.govt.nz

6 June 2017

[Proposed General Export Requirements for Bee Products](#)

s 9(2)(a)



I applaud the approach taken by the Ministry for Primary Industries (MPI) in running the Mānuka Honey Science Programme to develop criteria for identifying Mānuka honey from New Zealand and developing a scientific definition for it.

Please find my comments related to measurement issues in Annex 1, overleaf.

Yours sincerely

s 9(2)(a)



s 9(2)(a)



Annex 1: GC Response to the Proposed General Export Requirements for Bee Products

I note with interest MPI Technical Paper No: 2017/30 describing, with numerical limits, four chemical compounds characterising manuka honey and their determination by Liquid Chromatography Tandem Mass Spectrometry (LC-MS/MS). Further publication, as indicated by MPI, of the scientific basis of the quantitative criteria is awaited with interest.

I have also reviewed the published DNA method: "Multiplex qPCR for detection of *Leptospermum scoparium* DNA from pollen in honey" MLM-HON1.04 and am pleased to say that the document is well written, clearly laid-out and the terminology is distinct. However, if this method is to be internationally adopted and accepted, then, it is my opinion that it should be non-proprietary and freely available to all stakeholders.

I note that in the second set of frequently asked questions, published on 30 May 2017, under the section titled "Mānuka honey definition; why are some samples not passing the DNA aspect of the definition?" MPI states that "some companies have contacted MPI with information about honey samples that are failing the DNA test but passing the chemistry test for Mānuka honey" and that work is ongoing by MPI and dnature (DNA researchers) to investigate these issues. I have observed a number of aspects of the DNA method that I think could be strengthened to improve efficiency and robustness and I am very happy to offer the assistance of LGC's DNA experts³ to help MPI and dnature in their investigations.

My staff will contact the MPI Food Assurance Team separately to follow-up on this matter further.

From: s 9(2)(a) gmail.com>
Sent: Tuesday, 13 June 2017 11:24 a.m.
To: Manuka Honey
Subject: Submission of Manuka Honey Standards

Submission on Manuka Honey Definition

From

s 9(2)(a)

Operate 127 Hives

7 years bee keeping experience

We have some concerns regarding your proposed manuka honey definition.

Significant amounts of high grade honey seem to be failing.

We think that leptosperin and methylglyoxal should be included as they are proven to be reliable markers of manuka honey that are accepted by the industry and consumers alike.

Even though mgo changes over time there should still be a minimum amount needed.

Low grade honey is being accepted as Manuka and we don't feel your definition does enough to address this issue.

We need to Protect our PRECIOUS MANUKA HONEY NAME as it is seen worldwide as a top-quality honey.

To be called multifloral manuka it would be good to be mainly manuka e.g. 50% or more and contain manuka characteristics and taste.

We would like to see you working with Apiculture New Zealand on this topic as we believe they represent the majority of New Zealand Beekeepers.

Kind Regards,

s 9(2)(a)

13 June 2017

s 9(2)(a)

Released Under the Official Information Act 1982