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: |  |
| 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): |  |

# 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

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

[ ]  0-5 years

[ ]  5-10 years

[ ]  10 + years

[ ]  not applicable

1. 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

1. 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

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

|  |
| --- |
|  |

1. 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

1. 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?

|  |
| --- |
|  |

1. 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.

|  |
| --- |
|  |

1. 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

1. 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:

|  |
| --- |
|  |

1. 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

1. 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

1. 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

1. 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?

|  |
| --- |
|  |

1. 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

1. 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?

|  |
| --- |
|  |

1. 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

1. 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

1. 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?

|  |
| --- |
|  |

1. 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:

|  |
| --- |
|  |

1. 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:

|  |
| --- |
|  |

1. 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:

|  |
| --- |
|  |

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

|  |
| --- |
|  |

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

|  |
| --- |
|  |

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

|  |
| --- |
|  |

# Laboratory Tests

1. 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:

|  |
| --- |
|  |

1. 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

1. 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:

|  |
| --- |
|  |

1. 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

1. 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).

|  |
| --- |
|  |