



More information regarding consultation on science-based definition for mānuka honey and new export requirements

GREX implementation timeframes

When will the new export rules be in place?

Stock in trade provisions are outlined on page 26 of the Discussion document, the proposed approach is that:

- Honey exported to countries **requiring official assurances** must meet all GREX requirements from the date the GREX comes into effect (proposed 31 July). Countries requiring official assurances are: China, Japan, European Union, United Arab Emirates, and Korea.
- Honey exported to countries that **do not require official assurances** can continue to be exported for a proposed 6 month transition period ending 31 Jan 2018, **if**, the honey is packaged for retail sale before the GREX comes into effect.

Note that these timeframes will depend on the outcome of the consultation process that ends on 23 May 2017.

Mānuka Honey definition

Does the definition for mānuka honey cover kānuka honey?

The definition is for honey produced from the mānuka plant, *Leptospermum scoparium*. Kānuka is a different species of plant, (*Kunzea ericoides*) and from evidence to date kānuka honey produced predominantly from this plant will not meet the mānuka honey definition. The test was designed to differentiate mānuka from kanuka.

Does the definition for mānuka honey apply to Australian honey?

MPI's science programme was designed to identify New Zealand mānuka honey – that is honey made from the nectar of the mānuka plant (*Leptospermum scoparium*) - which is found throughout New Zealand. The test was not designed to apply to Australian honey.

As part of the science programme a number of Australian honey samples were tested, none of which met the definition. However, given that the same plant species is present in Australia (and other countries), there may be some Australian honey that has the same characteristics as New Zealand mānuka honey.

Once the new export requirements come into effect, only honey exported from New Zealand and that meets the definition will be able to be certified by MPI as mānuka honey.

Why are dihydroxyacetone (DHA) and methylglyoxal (MG) not included in MPI's definition for mānuka honey?

DHA and MG are markers commonly used by the industry to identify mānuka honey. Both were assessed in the MPI science programme as potential markers but were ruled out because analyses showed they were not suitable for defining mānuka honey. They are also unstable (changing over time) during both processing and storage.

Does MPI's definition for mānuka honey prevent adulteration?

The mānuka honey definition involves five attributes, at specified levels, making it more challenging to manufacture artificially.

MPI takes concerns about adulteration very seriously and will investigate any complaints that are raised.

The definition will form one part of MPI's wider system of traceability across the supply chain (including requirements for record keeping and verification) to help provide assurances about the authenticity of the honey.

Labelling and Grading

How does the definition for mānuka honey affect grading systems?

A number of honey companies use grading systems and content claims - numbers and symbols on the label that indicate particular qualities or contents of the honey. MPI is not proposing any export requirements relating to grading systems. This means that grading systems can continue to be used on honey labels, provided existing labelling requirements (contained within the Australia New Zealand Food Standards Code) are met.

What would my honey label need to say to comply with MPI's definition for mānuka honey?

MPI proposes the following labelling requirements for exported honey:

- If you want to represent honey as mānuka with no qualifications (i.e. the word “mānuka” or “mānuka” on the label stands alone), then the honey must meet the definition of monofloral mānuka honey.
- If you want to represent honey as mānuka with qualifications (i.e. you have the word “mānuka” or “mānuka” on the label, along with the word “blend” or “multifloral”, or other words that indicate that there is an additional floral source present), then the honey must meet the definition of multifloral mānuka honey.
- To avoid doubt, when labelling mānuka honey that meets the definition of monofloral or multifloral mānuka honey, you can choose whether you want to use a macron on your labels (i.e. ‘mānuka’ or ‘manuka’).

For more information see Part 5: Labelling of monofloral and multifloral mānuka honey (page 18) of the draft GREX. You can also get further explanatory information in Section 4.5 ‘Labelling of Monofloral and Multifloral Mānuka Honey’ on pages 20 -23 of the Discussion Document.

Testing honey

What will it cost to test honey to MPI's mānuka honey definition?

Testing costs will be determined by the commercial laboratories offering the testing.

Do I need to do both the chemical test and DNA test?

Yes, for the purposes of export certification, results from two laboratory tests are needed (one for the chemicals and one for DNA).

How do I homogenise a batch of honey?

Samples must be representative and randomly drawn from a batch. This means that the honey must be thoroughly mixed. To 'homogenise' honey means to mix it so that all components are distributed evenly. The Tustin Compliance Guide has useful information on how to achieve a homogenous batch. You can see the full [Compliance Guide to the Food Standard: Tustin in Honey](#) on the MPI website.

Why is it my responsibility as the operator to interpret the results of laboratory tests to determine if my honey meets the definition for mānuka honey?

Laboratories have a responsibility to provide the test results but do not interpret the results. Interpreting laboratory test results is part of the legal responsibility of an operator. The processor needs to ensure that their product complies with specified compositional requirements and that it is not associated with a false or misleading representation of any kind.

How do I interpret the results of laboratory tests to determine if my honey meets the definition for monofloral or multifloral mānuka honey?

MPI has provided guidance to help interpret laboratory tests results. The results for each chemical and DNA marker must meet the levels stated in the definition for mānuka honey in the link: [Mānuka honey science definition](#).

Will I still need to test my honey for C4 sugars, Aerobic Plate Count (APC) or Hydroxymethylfurfural (HMF)?

As at present, testing for C4 sugars, APC or HMF is dependent on the importing country requirements. The draft GREX does not propose testing requirements for these substances for export where the importing country does not require it.

Compliance and Verification

Will the proposed export requirements apply to honey exported in bulk drums?

Yes, bulk honey that is exported as mānuka will need to meet the mānuka honey definition.

MPI does not have jurisdiction to impose regulatory measures in overseas countries. Assurances given by MPI apply to the status of products as of the time they depart New Zealand.

The new export requirements will provide information, not currently recorded, about how much honey is exported from New Zealand as mānuka. This information will help in reconciling volumes of mānuka honey in market, which may assist in identifying fraud or mislabelling issues.