



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:	s 9(2)(a)
Your contact details (such as phone number, address, and email):	s 9(2)(a) 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
 - ☐ x 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
 - ☐ x 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?

Wairarapa

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?

Would make it financially impossible to continue. Bankrupt the 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.

4.1.1 a, b, c,

It is impractical to mark all supers & keep them for each apiary. Supers are changed depending on the flow & the season. Some are removed empty, some partially full.
Frames may be changed from super to super depending on hive management requirements.

When supers are taken to a processing facility, frames are put back into different boxes due the nature of the plant. Therefore the content of that super has changed.

Supers may be removed from one apiary, extracted then placed in another apiary for a later honey flow or put on hive to clean or winter down.

The cost for a beekeeper to set up a recording system, numbering & labelling every super would be prohibitive. Especially for a single operator. Also impossible to monitor.

If it were possible it would be done in the prevention & the control of AFB. The best that can be done there is apiary quarantine. This requires the storage of supers separate from other supers.

A apiary of 25-50 hives each requiring upwards of 4 or more supers per hive.(200 supers must be marked & kept separate from another 200 supers) Impractical.

Often several apiary sites are extracted together to make it worth the while of the extraction plant.

It would be impractical to put one apiary site through the plant. Get the test results & volumes from the site, clean the plant & then start again when there may only be 5-10 hives in an apiary. There would be insufficient honey to warrant the extraction & too much would be lost in the cleaning of the plant.

This has become very apparent this season, where there may only be one super extracted from 20plus hives in an apiary.

The rules imply that this super should be extracted, recorded & kept separate from other apiaries.

What is proposed would only work if there is a reasonable expected crop from each apiary & hive. As this is impossible to predict & the management of the hives is different to that of live stock it is impracticable to manage under the proposed plan.

What is being asked is to record which set of milking cups was placed on which cow when it was milked. It is neither relative or practical.

The volume of one super & its affect on an apiary is proportionally too small to warrant.

The volume from an apiary is often too small to be completely isolated.

For anyone to trace contaminates in honey back to a particular hive via its super would be impossible.

To control the contents of that super is also impossible. The security of supers & hives is not controlled by the marking of supers, but the location & of the apiary site. NAIT tagging of stock does not stop the theft of cattle & that cattle being presented again with a new tag, neither will the tagging of supers.

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)?

The forms that are required now are sufficient. Any more would be time wasting. Even if it was done electronically, not only the cost to purchase the equipment & maintain but also the required record keeping for no gain.

Single or small beekeeping operations, operate on very small margins. They stand to make big gains or they can lose so much that it becomes uneconomical to operate all in the one season. There is a reason that a lot of these beekeepers are not RMP, & that is the cost & administrative requirements don't warrant it. You are effectively forcing them to become RMP compliant when it would not be a practical business solution.

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:

☐x I disagree because:

What is the aim of MPI, to track where honey came from, type of honey. Or is it based around the 'Manuka' Brand only?
At present there is traceability to the apiary site of all honey extracted.
Therefore one must conclude that tests are being done to ensure that contaminants are not entering the Honey.
To legislate was already in place seems to be a waste of resources.

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:

MPI have a very small & limited understanding of a beehive & its management. A frame of honey one year may become a brood frame the following year or visa versa. Is MPI implying that All frames be tracked on the life time in hives? Does MPI believe a super will always remain a super & a brood box (frames) will always remain a brood frame? If that is the case, then MPI have failed to understand the business they are endeavouring to regulate & therefore any attempt to impose regulation or tracking will only fail.

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

That only varroacides that do not leave a residue be used in hives during honey production.

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:

MPI are double dipping. All beekeepers should be registered under the AFB plan. To re-register to satisfy an administrative requirement is wasteful. To make beekeepers pay a yearly fee for no yearly gain to the beekeeping borderlines on extortion.

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

The perceived lack of traceability is brought about by MPI failing to use the information that is already in place. Under the AFBMP all beekeepers are registered, apiary sites are registered & a monitoring program is in place.

MPI only need to get the information from the AFBMP. MPI Do Not provide any monitoring system & benefit to the industry, except that which appears to be parasitic.

If they joined forces with AFBMP, then the industry would have traceability & possibly a better means of reducing the incidences of AFB. This in turn would increase the profitability to the industry.

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:

Not warranted & too expensive for the beekeeper to operate. The beekeeper is unable to pass on this extra cost.

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

The perceived 'gaps' in the traceability are not there. Honey is recorded from the apiary to the processor now. Anymore recording will not make it anymore traceable.

An apiary is covering an area of 25km square. Honey from a super can from anywhere within that area, including the hive next door. What is being proposed will Not increase the reliability of where that honey came from.

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?

Make it uneconomical to continue to operate.
This will only increase the cost to other operators who must now bear the load of the tax.

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:

These harvest statement requirements are already in place.

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

There is No traceability gap in the supply chain as it is already recorded.
A certain amount of Risk Management must be incorporated to ensure that the level of traceability does not exceed the perceived risk.
What is the perceived contamination levels? Are level of traceability is to match the level of risk.

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:

Beekeeping is a hands on business & therefore time is the most valuable resource available to a beekeeper & the business. More time taken away to do Non Productive work, reduces the time available to run & administer the duties for the rest of the business. This reduces the time available to care for the producers (Bees) which in turn impacts on the overall profit of the industry. Beekeeping is a year round business with periods of

extremely high workloads. This is especially true for sole operators. Increasing that work load at peak periods will cause failure at certain points. This may result in inaccurate records being kept; lack of profit for the business or worst of all, the hive health may be affected.

Beekeeping is a specialist business, completely different from normal agriculture & fixed based businesses. To try & impose additional restraints on business that are contrary to the way it would normally operate is only going to cause conflict or failure. The information gained would be very subjective with regard to accuracy.

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:

Traceability is already in place.

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

There is a perceived lack of traceability. Traceability is already there.

Is there any more warranted?

At what level does it become unwarranted?

Lack of understanding on the part of MPI on how a beekeeping operation operates & the nature of hive management seem to be the greatest threat to traceability at this stage.

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:

☐x I disagree because:

Completely irrelative, unless MPI also suggest they are going to define “Clover”, “Rata” & other types of honey as well.
It is not the name on the honey that makes any difference. It is the activity content & the possible benefits of that honey that make the difference.

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

Yes, put the word possible in front of Manuka will cover all concerns.
‘Possibly Manuka Honey’
It is not the type of honey that is of value, it is the level of activity that counts

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:

☐x 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?

☐x 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 is the level of activity that makes the honey, Not the type of honey. Manuka or otherwise.

☐ 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?

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).

<Manuka.Honey@mpi.govy.nz>

s 9(2)(a)

9 June 2017

MPI Manuka Honey Science Programme Update.

Dear MPI Manuka Group

Again we have received a circular regarding the problems regarding the DNA in determining the purity of manuka honey.

In it you do mention that many samples past the chemical test but some did not pass the DNA test.

It is like banging my head trying to get to you that the DNA test should be removed as there are so many reasons why manuka pollen could vary greatly to even be absent in pure manuka honey. It is necessary for someone in your team to actually observe bees working Myrtacea type flowers for nectar in contrast to pollen.

From what I have heard the UMF tests are far better than what you have chosen and you should have spent the last 3 years cooperating with the UMF group instead of trying to be completely independent.

In your emphasis on DNA, I am wondering if it could be added to honey by homogenising some manuka leaves to add to the honey? In the past beekeepers have added artificial MGOs, heated it etc to improve their honey's "activity". I expect the same devious individuals will soon learn to add some of the chemicals you have listed in your chemical tests.

We still depend on taste, and the jelly nature to determine the manuka honey purity as although manuka and kanuka both have the jelly nature the flavours are distinctly different.

Looking forward for you to come up with tests that cover all aspects of manuka honey, I as well as yourselves want to see people actually receiving quality manuka honey instead of some of the devious concoctions being sold as manuka honey at present.

Yours

s 9(2)(a)

<Manuka.Honey@mpi.govt.nz>

s 9(2)(a)

9 June 2017

Manuka Honey Team
MPI

Dear Team,

This is a postscript from yesterday's e-mail.

I see in today's AG Brief that Professor Peter Deardon from Otago University states that he could determine the origin of manuka honey in New Zealand from the DNA of the pollen. He also is working on the percentage of manuka pollen in the honey.

Because bees often work other pollen sources in preference to manuka, the percentages mean very little in many cases. If still working on the DNA at least work it out on the number of manuka pollen grains per gram to get a realistic comparison.

He would be able to get a more realistic source by knowing what other pollen plants were growing in the area the manuka honey came from.

One theory I have had for many years, is that as gold and silver in a colloidal state are very antibiotic in nature, it may be the source of the manuka antibiotic nature of manuka honey. I have had some of our manuka honey tested and ours has about s 9(2)(b)(i) gold in it. That might be enough. When you consider where the active manuka honey comes from, the volcanic and aluvial gold areas also have a relationship.

Apart from myself I don't think anyone else has thought about that aspect, although I had brought it up with Peter Molan a short time before he died and he expressed an interest in that idea.

Anyway a few other things to consider

Yours

s 9(2)(a)

<manuka.honey@mpi.govt.nz>

s 9(2)(a)

Submission on:

Proposed general export requirements for bee products

s 9(2)(a)

Manager of previous companies listed above

Previously Apicultural Advisory Officer in Department of Agriculture

Address also listed above.

I appreciate the opportunity to discuss the proposed general export requirements for the GREX, but unfortunately it did not consider the actual beekeeping practices to determine if the suggestions could even be considered at all. It gives me the impression that it had been designed by a COMMITTEE with no experience relating to beekeeping itself. Just focussing on rules and regulations.

The first stage setting out the proposed rules and regulations are far too complex and detailed to be understood by anyone except a lawyer and that would be costly if needed. However to not understand them could result in big fines for an individual beekeeper.

We are told that consultations will start from the 11 April, but going by the previous Tulin Regulations, there were no changes made following submissions as they were gazetted before any submissions could have been added.

I trust that will NOT be the case with the GREX regulations.

I will go over the sections in your boxes as follows:

Getting to Know You

1 Beekeeper, and have in the past done all of the other functions listed.

2 Have been involved just on 70 years

3 We operate under a RMP

4 we operate 51-500 hives at this time

5. We operate in the Buller District.

6. We at this time supply other exporters but will go back into exporting honey products and queen bees as we grow our business again.

We currently employ 4 people and will expand soon, to employ more, especially rearing bees resistant to the Varroa Mites, which is needed by the industry.

Everyone does everything, as in a small business versatility is essential.

Estimated costs of proposals:

When the RMP was introduced to replace the local Health Inspector, s 9(2)(a) told us that it will cost more as it will not be subsidised by the Government as happens in Local Bodies.

However the cost keeps increasing and is quite a cost to small businesses and now is done twice a year while most are not even extracting their crop during the second inspection, so really is little more than another indirect tax grab. It just involves rechecking the books following the honey from extracting until leaving the premises which was done the first time. Unless in a large way, many of us find the present costs difficult to meet without an additional cost put on top.

For instance we still have to have our honey tested for Tutin which is another cost but throughout all the years there has never even be a trace of tutin in our honey. When enquiring why we still need to test we are told that there "Might Be" tutin in our honey. Pigs might fly but not very often?

The next box goes into defining monofloral and multifloral manuka honey.

In our business we take great care to select pure manuka to the extent we actually inspect each comb which can often contain two types of honey. We then remove non-manuka by extracting the comb and then scraping the jelly like manuka honey from the comb and putting it through a press, as manuka honey will not extract under normal circumstances. That is why most use a pricker system to dislodge it.

Because we take such care we offer the honey as "Premium Manuka" to our buyers who then test it anyway they like to suit their market requirements.

After buying our manuka honey many say their overseas buyers prefer it to any other manuka being offered, so our standards must be high and acceptable.

I expect "Premium Manuka" will not conflict with the standards you have as packers will have to change to your naming system if exporting it.

Basically GREX cannot be followed if the requirements of section 4 are to be included.

Everything is going along the clerical line which will be costly to follow while taking effort away from the production side of beekeeping.

Already it takes a lot of office time to relate production details to e-certs etc and in some cases some bureaucrats seem to delight in finding minor faults that could be corrected as seen, but usually affect exports etc, which is the ideal aim of MPI to assist. Some members of Asurequality caused problems that now are not experienced by us since moving completely under MPI for our RMP etc.

I feel the questions attached to section 4 do not adequately represent what is of concern in that section.

For that reason, I will look at each section in detail and suggest ways to improve them.

Part1 It states that no feed is fed to bees during the harvest season. It does not specify what feed , sugar or honey? But I expect it means sugar. I believe one test for honey is testing for Cane sugar (C4) but I believe some are now using Beet sugar (C3) which is not being tested for?

Kiwi Fruit growers want beekeepers to feed sugar syrup while the bees are in the kiwifruit orchards to encourage the bees to breed and look for pollen on the kiwifruit flowers. It could lead to some sugar being moved up from the brood nest into the honey supers after going onto other crops like manuka. I expect there needs to be a degree of tolerance for those involved in that programme, perhaps requiring the initial crop to be blended with later honey to keep the sugar level down to acceptable levels.

Most beekeepers only feed enough to get their hives safely through the critical period before the main honeyflow begins, so should not be a problem unless a beekeeper is careless and overfeeds. However beekeepers often put honey supers on hives before the flow starts as it saves time later on. The bees will not move honey up from the brood nest under normal circumstances until an actual honeyflow starts, and most if not all sugar will go into feeding the brood.

I see the problem relating to honey from broodnests that have previously had miticides placed in them. However it does not consider our beekeeping where we are now producing bees that do not get affected by the mites and we do not have to use miticides, so can take honey from the brood nest and in a year like this is probably our only source of honey to keep us solvent. Overstocking has compounded the problem of poor weather affecting crops.

Question 12 asked about beekeepers needing to be under certain risk based plans. I was given the impression that this is already the case.

The proposal to obtain a full list of beekeepers wanting to provide honey for export, should not require a charge to administer. The list could be obtained from the Apiary Register maintained by AsureQuality free of charge as already all beekeepers are being levied under the AFB provisions, and the information should be free to all including MPI.

Question 13 is more or less covered above.

When we come to the proposals of 4.1 of the GREX draft, the whole thing comes crashing down due to lack of basic logic. Lets look at each part as listed.

First I have yet to locate an indelible marker that will remain legible for any time at all without being removed by the weather etc. However this is the first lack of logic, as I have tried all sorts of markers to follow our breeding programme and none suitable to record on supers. Perhaps you are thinking of ear tags?

As beekeepers we have to identify our apiary ownership by displaying our registered number "somewhere" in the apiary, but could be on a marker plate alongside the apiary. Not on each hive or all supers. Of course it could be burnt on each super but what would be the value? As it is the honey frames that are what transport the honey and can move from one super to the next frequently during hive management.

Then we go onto having to record every site where the super has been on a hive for each season. Somewhere, someone is completely confused about how hive management actually works. First it is the honey frames that can be carried from one site to another while the actual supers could go in another direction entirely.

During honey extraction an extractor will redistribute frames into many different supers which then go in different directions as required.

However why worry about the supers or even frames. What we are trying to determine is the purity of manuka honey and other honey types. Following extracting the combs should be virtually free of the last honey collected and then if placed on hives working manuka, the resulting honey should be practically pure manuka when extracted. It is during extracting or later when other types of honey could end up being mixed with the manuka honey ruining its purity. The proposed test for manuka honey purity is all that is required, and any reference to the supers is just a bureaucratic waste of time, thought up by someone in an office with no practical field experience.

Lets get away from the nonsense relating to marking supers and following their movements and get around to testing if the honey actually meets to purity requirements. It is the honey we need to consider not the miscellaneous ideas mentioned previously, which would only have created a lot of unnessessary work, but achieved nothing of value.

We do not need to give a GPS location for each apiary. Just give a map reference which Asurequality can convert into a GPS figure using their computer.

It wants the beekeeper to record the date and volumn of honey extracted. Surely you want the weight in Kilograms, not the volumn?

You need to know how many supers CONTAINING HONEY are removed from the apiary. Any other super information is irrelevant whether removed or left on the hives. Likewise as the indelible marker will not be permanent there is no point in trying to fullfill the request of point 1V.

Then we come to section (d). I suggest you read it again and determine what information is specified in (d). According to my logic, there is nothing specified in (d) at all.

At present if beekeepers have burnt in their registered number into supers, it is practically impossible to remove it. Hoeweever any indelible marks will naturally disappear in time. Also it is not the supers that matter as explained previously. If it is to trace stolen hives or supers, most beekeepers can recognise their equipmmt.

If in the future MPI recognising the difficulty in controlling FB at present appoint many more Apiary Inspectors(Instructors) with individual districts, then hive stealing will be observed quickly as in such circumstances each district beekeepers work together much more.

It states that MPI propose that beekeepers will have to provide a harvest declaration for every batch of honey supplied to an exporter for processing for export. Surely the e-cert already includes the details required without having to include another piece of paper saying the same thing? In emergencies such as potential toxicity, the e-cert will give the details required. Filling in paper is time consuming enough at present without adding to it. Perhaps MPI office staff are trying to justify their existence by finding other things to fill in our "spare time"?

It is suggested that costs associated with these proposals are unlikely to be onerous. Any costs tend to escalate once established to quickly become onerous when added to all the previous ones. If so important, it should be directly funded by Government who frequently say how much beekeeping contributes to the economy. If we do contribute as much as stated, then let the Government recover their costs through the resulting annual taxation instead of using indirect taxation within the year.

Lets try to reduce paperwork etc instead of increasing it. Time consuming and only giving work to paper shufflers and not in essence productive.

Looking at the definitions:

Monofloral Manuka Honey: The chemical markers as such might be satisfactory, although ingenuous operators might in time find ways to include them artificially as occurred with mgo's in the past.

However when it comes to using DNA from manuka to determine its purity, there are problems. Previously I was involved with pollen analysis when in the Department of Agriculture and have followed it since then.

When observing bees working manuka flowers they seldom collect pollen from it. Instead will collect pollen from the occasional kanuka in flower in the vicinity even though not working the kanuka for honey. Manuka needs a wet subsoil to secrete nectar properly, while kanuka will only produce nectar when the soil is dry even to the drought stage when kanuka will yield nectar abundantly. Usually one type of species will dominate in each area but usually some of the other species also present to some extent.

Also because of the methods of removing manuka honey from the combs, any pollen from previous honey flows will be removed then and show up in the resulting manuka honey. At present we are talking about the percentage of manuka pollen, but because other types could also be included accidentally we need to consider the number of manuka pollen grains per milligram of honey rather than talk about a percentage. Also during a manuka flow our bees will work dandelions for pollen to support brood rearing if available. If no other flowers available then would no doubt work the manuka itself for pollen for their brood and then the percentage of manuka honey would be quite high.

In the past a Honey Grader was able to determine a honey origin by taste and texture etc. Perhaps it could be considered in conjunction with the present lab methods.

My Grand Daughter determines the quality of our Premium manuka honey by taste and texture to a very high degree without any other considerations.

Of course I could send you a sample to compare, but I expect you would not like to confuse things more than you have to date.

I expect the Lab tests will add costs to each stage of manuka honey marketing which will end up affecting the returns the actual beekeeper will receive as those involved in the sale side seldom are affected directly. Smaller beekeepers like ourselves will be affected most, and that in turn will affect our viability for providing pollination etc while the bigger businesses have gone away from providing pollination concentrating on just manuka honey production.

I trust the the final GREX will end up much more simple to follow while still achieving the aim of marketing manuka honey as specified on labels.

s 9(2)(a) from the Isle of Mann used to buy about s 9(2) tonnes of manuka honey a year but reduced his purchases once beekeepers started heating the honey to increase the activity, and also started adding mgo's, but he has used a German Laboratory to eliminate the falsely labelled honey. He has examined our Premium Manuka honey and said it was the best he had seen from New Zealand.

Perhaps MPI could negotiate with s 9(2)(a) and s 9(2)(b)(ii) to arrive at a system to achieve what MPI are wanting but removing the bureaucratic side which makes it unwieldy for the beekeepers?

I trust my observations will assist.

Yours

s 9(2)(a)

<manuka.honey@mpi.govt.nz>

s 9(2)(a)

31 May 2017

Manuka Honey Team
MPI

Dear Team,

In my submissions to date I have endeavoured to stress that you cannot use the DNA of Manuka Honey to prove its purity.

I expect I will need to go into my argument in more detail to show you the error of your present tests.

First you need to realise that bees need pollen for brood rearing and a number of workers seek it out. Secondly when there is ample nectar available the bees then will move to seek nectar still leaving a number to concentrate on gathering pollen.

Then you need to realise that the myrtacea type flowers have a distinct calyx with the anthers on the stamens held well above it. When the nectar flows, the bees will often work beneath the stamens concentrating on the abundant nectar, avoiding the pollen on the stamens.

In my past I was appointed as the person doing pollen analysis in the Department of Agriculture and took particular notice of the various pollen sources and how the bees gathered both pollen and nectar.

I have observed bees working Rata flowers and the consistently worked the flowers from the side of the calyx. I have checked honey from the Rata and it did not contain ANY POLLEN AT ALL, even though it was very pure.

It is well known that Kanuka produces much more pollen than manuka and even when the bees are working manuka flowers for honey you will see others working kanuka flowers for pollen.

Likewise bees working manuka flowers for nectar will still be seen bringing in copious amounts of pollen from summer flowering dandelion type plants, lotus major, clover etc to fill their brood requirements.

The only time you will see bees bringing in pollen from manuka is when they have no other alternative sources.

The methods used to extract the jelly like manuka or kanuka honeys will also put earlier pollen types into the manuka honey, so it is complete nonsense determining the percentage of each type of pollen. It would only work if the honey was gathered from a pure stand of manuka and using new combs with no earlier pollen in them. Then you could determine the purity based on the number of manuka pollen grains per gram, instead of anything else. Any other situation could not give a comparison for purity.

The obvious thing is to concentrate on the chemical indicators perhaps incorporating the assistance of the UMF group to arrive at a definite check on purity etc.

Trusting my observations will assist you in arriving at a useful test.

Yours

s 9(2)(a)

Released Under the Official Information Act 1982

From: s 9(2)(a) .co.nz
Sent: Sunday, 23 April 2017 7:34 p.m.
To: Manuka Honey
Subject: Proposed new requirements of Manuka Honey

Follow Up Flag: Follow up
Flag Status: Completed

s 9(2)(a)

I am impressed with the work done on putting a definition to manuka and the proposed new measures to ensure continued market confidence in purchasing NZ honey. The part I am concerned about is the section 4.4.1 Pre-processing traceability requirements.

My RMP s 9(2)(b)(ii)

1. My business is involved with beekeeping and extracting, processing packing and retailing of honey. All our Manuka 5+ and up is sold to people who pack and export likes of s 9(2)(b)(ii) and s 9(2)(b)(ii). All non active honey is sold locally through local paknsav and new world whangarei.
2. My business has been running for 11years
3. My RMP s 9(2)(b)(ii)
4. I run an operation of 600-800 hives mainly for honey production and avocado and kiwi fruit pollination.
5. I operate in the whangarei region Northland
6. I employ myself and 1 other full time staff member and during the best part of the year another 3 workers. At present packing and processing only my own honey but am looking at extracting for another beekeeper with more hives than me. I am struggling to get my head around and keep up with MPI requirements and offer a fair an honest ongoing business relationship with processing another beekeepers honey.

Section 4.4.1 Pre-processing traceability requirements is currently my only main issue for the main operation of my own business. Namely the unique identification of each honey super and recording of its movements. All my honey supers and brood boxes are branded with my logo and apiary number, this was allot of extra work. To make each box unique with a brand the only marking system I've found is lasting is not possible. The logistics of recording unique honey supers would create another job and create a lot of confusion and paper work. Each of these boxes will all be mixed into a batch on processing based on apiary sites. The information is then useless from my perspective. It does create a point of contention for the proposal but I fail to see any further benefit. Counting boxes per batch is useful to compare site production year to year but is only for interest. Recording which sites that make up a batch of honey is import to trace back but recording each box is just stupidity.

All in all there's been some great work done to get this far and I back it 100%

From: s 9(2)(a) @hotmail.com>
Sent: Wednesday, 26 April 2017 4:15 p.m.
To: Manuka Honey; s 9(2)(a)
Subject: Re: MPI Mānuka Honey Science Programme;submission

Dear Sir/Madam,
here is my submission

From: s 9(2)(a) hotmail.com>

'Proposed General Export Requirements for Bee Products';

1. Kanuka honey should be included as manuka honey as it is essentially the same tree and there is no evidence to suggest it has any less health properties than manuka.see below.
- 2.None of this is going to stop people in Asia somewhere cheating by relabeling honey as manuka,which is then repackaged or whatever and sent on.
- 3.It would seem that s 9(2)(b)(ii) is the driving force here to dominate the market and push its share price up etc.,so will result in lots of small operators going out of business.
- 4.the beekeeper register list fee is grossly unfair to small businesses and should be charged on a levy system in relation to export size.
We already have a rigorous testing and trace-ability with the risk management procedure?afb management procedure which lists all sites and harvest declaration.this should be linked to you.
- 5.We should be looking for residual chemicals and sugar in all honey rather than wasting time ,money and energy on this.
- 6.There will also be a shortfall in fulfilling export contracts if you take kanuka out.

According to Dr Shaun Holt, founder and medical director of HoneyLab, a company that develops pharmaceutical products from bees and their environment.

HoneyLab is currently researching the health benefits of New Zealand's own kanuka honey, with some very promising results to date.

Although kanuka honey is not as well-known internationally as its big cousin manuka, it actually contains more of the "manuka factor" that enhances the antimicrobial (or antiseptic) properties of the honey.

Both these honeys are thought to be so potent at healing infections that many hospitals around the world are now turning to them.


The main uses to date seem to be in wound healing, especially in ulcers that are slow to heal, and treating skin infections caused by the "superbug" MRSA

yours,

s 9(2)(a)



[Not relevant to request]



Released Under the Official Information Act 1982

From: s 9(2)(a) @hotmail.com]
Sent: Wednesday, 26 April 2017 4:58 p.m.
To: s 9(2)(a) mpi.govt.nz>
Subject: Re: MPI manuka honey science submission

hi s 9(2)(a)
had trouble attaching this so copied and pasted cheers s 9(2)(a)

Your details

Your name and title: s 9(2)(a) owner

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 ; re star i.e. *

What part of the supply chain do you operate in:

beekeeper *

extractor

processor

packer

exporter *

retailer of bee products

other – please specify

How long have you been involved in the apiculture industry:

0-5 years

5-10 years

10 + years *

not applicable

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

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

What region of New Zealand do you operate in?

otago

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

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?

the impact will be to half our income driving us to cease exporting and to revert to domestic sales thus negating the need to bother with rmp extraction and new drums etc reducing the overall quality of the product.

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.

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

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:

this ensures the honey is sugar free

I disagree because:

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

referring to synthetic chemicals ,

1. only untreated wood ware should be used except bottom runners in contact with the ground.
2. strips should be removed prior to supering up.
3. use bayvarol or organics in spring to lessen residues in honey

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:

if apistan is used

I disagree because:

if apivar or bayvarol or oxalic etc as residue is much lessened

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

use organic alternatives ie oxalic vapourizers

Processors of bee products to operate under a risk based measure

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:

this ensures quality

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

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 is a waste of resources

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

we should not be charged a flat fee for this as it unfair to small operators ,the ministry should pay or if not then a levy system based on tons exported

Pre-processing traceability requirements

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

I agree because:

I disagree because:

we have enough traceability

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

the various bodies should be linked i.e. afb site register,rmp,and harvest declaration,i.e. assure quality

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?

high cost impact costing us up to half or more of our income if kanuka is removed from manuka status

Traceability from beekeepers to operators – harvest declarations

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

I agree because:

in principal,should be linked to afb and rmp harvest decs

I disagree because:

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

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:

we are already burdened by afb levies, rmp costs and honey testing. all of this should be paid for or compensated by ministry

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

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:

it will obviously be over priced placing a further burden on us

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

keep products for export under rmp

Labelling of monofloral and multifloral mānuka honey

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

I agree because:

I disagree because:

kanuka should be included

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

include kanuka and remove dna test

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:

yes

I disagree because:

I have concerns because:

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:

all manuka/kanuka honey is essentially "Manuka"

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:

yes

I disagree because:

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

Do you have any comments on the summary science report?

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

all manuka/kanuka honey is essentially "Manuka"

Laboratory Tests

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:

kanuka is not included

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?

all manuka/kanuka honey is essentially "Manuka"

Transitional provisions

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:

yes

I disagree and propose an alternative timeframe:

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

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).

From: s 9(2)(a) yahoo.com.au>
Sent: Wednesday, 26 April 2017 5:03 p.m.
To: Manuka Honey
Subject: submission from s 9(2)(a)

Your details

Your name and title: s 9(2)(a), owner

Your contact details (such as phone number, address, and email): s 9(2)(a)

General questions: getting to know you ; re star i.e. *

What part of the supply chain do you operate in:

beekeeper *
extractor
processor
packer
exporter *
retailer of bee products
other – please specify

How long have you been involved in the apiculture industry:

0-5 years
5-10 years *
10 + years
not applicable

Do you operate under:

an RMP under the Animal Products Act 1999 *
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the Food Hygiene Regulations
none of these
not applicable

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

What region of New Zealand do you operate in?

otago

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

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

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I agree because:

yes

I disagree because:

I have concerns because:

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

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I agree because:

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Do you have any suggestions for minimising any impacts?

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I agree because:

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I disagree and propose an alternative timeframe:

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

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.

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:	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

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

5-10 years

3. Do you operate under:

an RMP under the Animal Products Act 1999

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

1001 to 3000

However we extract for up to an additional 5000 hives and therefore indirectly manage the processing for a wide number of other beekeepers

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

Lower North Island

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

We do not export directly

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

General Overview

In responding to the proposals I think its appropriate to go back to the start of this process and highlight the issues that generated this initiative and then at the conclusion highlight what we believe is sucessfully addressed and what is not.

It is my belief that this initiative was started by issues raised by

1. Hong Kong Consumer Council Test Results of Honey Sold in Hong Kong Published in "Choice" Magazine, Issue 441, July 2013
2. Investigation in 2012 by UMFHA into fake Manuka being sold in Singapore
3. Investigations by "The Grocer" into fake Manuka being sold in the UK circa 2015/16

To summarise these are the issues that were found:

1. Manuka was being sold with no details as to its source (other then it was from NZ)
2. Manuka was not true to label with varying levels of MGO
3. Manuka was being sold with different systems describing or attempting to describe its activity
4. Manuka was contaminated with antibiotics and amitraz
5. Some honey had excess C4 sugar contamination
6. many samples did not match the country-of-origin claims on the product labels, or the product descriptions were misleading. Pollen testing showed contamination with honey from countries other than NZ.
7. The freshness of some samples was deemed unsatisfactory (high levels of HMF, HydroxyMethylFurfuraldehyde), indicating that these products might have been stored at excessively high temperatures
8. High levels of fermentation present in some samples as assessed against CODEX

Before responding to the stated questions I will make the following comments on these issues:

1. *Manuka was being sold with no details as to its source (other then it was from NZ)*

MPI have delivered new labelling requirements for all honey that is exported from NZ. I am not aware of any published studies as to whether Manuka Honey is still being sold internationally as being from NZ when it is not or whether it has quality issues as previously described. Without this survey it is difficult to assess whether the labelling requirements have been sucessful in stamping out this issue.

2. *Manuka was not true to label with varying levels of MGO*

Anecdotal evidence is that Honey exported from NZ now meets the MGO levels described, however as MGO levels fall dramatically if the honey has been overly heated to increase MGO levels in the shortest timeframe, and as MPI have no current guidelines or regulations for the ageing of Manuka, I would suggest that random samples will still find issues with MGO levels in honey not always being true to label. In addition it is still entirely possible to add synthetic MGO to bulk Manuka outside of NZ to artificially increase MGO levels.

3. *Manuka was being sold with different systems describing or attempting to describe its activity*

This has been largely addressed from Honey exported from NZ under the new labelling requirements, however without a market survey has it really been successful?

4. *Manuka was contaminated with antibiotics and amitraz*

I am unaware of detailed work to isolate why the HK study found antibiotics in NZ honey. As antibiotics are banned in NZ beekeeping there was either a breach of NZ law, bees collected contaminated nectar or honey was blended outside of NZ that contained antibiotics. Amitraz and other miticides are from our experience likely to be present in NZ honey because of misuse of treatments, we will comment on this later in this submission.

5. *Some honey had excess C4 sugar contamination*

Contamination is likely from either NZ bees being fed sugar, honey from outside NZ being added to the Manuka and this honey having C4 contamination or alternatively C4 being added at the blending stage to increase yields. This could and should have been traced by looking at RMP samples and following the traceability process back to the source, however there is a lack of any published analysis as to how this occurs. Honey leaving NZ is now tested extensively for C4 contamination but once again there appears to be little market survey analysis to see whether this has successfully addressed the issue.

6. *Many samples did not match the country-of-origin claims on the product labels, or the product descriptions were misleading. Pollen testing showed contamination with honey from countries other than NZ.*

This result would suggest there is widespread blending of NZ Manuka once the product leaves NZ. Once again the level of fraud carried out here has only really been commented on by the media following the likes of investigations by the "Grocer" in the UK

7. *The freshness of some samples was deemed unsatisfactory (high levels of HMF, HydroxyMethylFurfuraldehyde), indicating that these products might have been stored at excessively high temperatures*

I am unaware of any specific initiatives to address the issue of how long and at what temperatures honey is stored. It is common practice for Manuka to be aged at temperatures from 20C to 32C, the temperature and duration of this storage is currently unregulated and is not addressed by any proposals we have seen. We believe this also directly impacts point No. 2.

8. *High levels of fermentation present in some samples as assessed against CODEX*

It is now common practice to address this using pasteurisation, however there is no attempt in these proposals to formalise the legality of this in the packaging of honey. This remains an issue for some markets and should be addressed by these proposals along with storage and any thermal treatment, both natural and artificial.

In summary some of the proposals MPI have already implemented have addressed some of the issues with Manuka Export but only at the point at which the goods leave NZ. The continued practice of allowing the Bulk export of Manuka honey from NZ allows this honey to be adulterated once it leaves NZ's jurisdiction. We believe the new Codex will not stop practices such as the addition of synthetic MGO offshore and the traceability systems are not sufficiently robust to prevent this. In fact it is arguable that once Codex is known, foreign blenders will be able to blend honey to meet codex using non NZ honey and synthetic MGO.

Its also unclear as to what will stop NZ Manuka being blended down with other honeys once it leaves NZ and the various contaminants that may occur at this point. A robust investigation using samples from some of the past examples would have likely identified what processes were involved in creating the fraudulent product. Instead, these proposals currently being discussed have perhaps made assumptions as to the source of the contamination and therefore the solution.

While we have significant reservations about a scientific approach to defining a natural product that shows significant year to year variability, we do support the addition of a scientific definition for Manuka to CODEX. Our Caveats are

1. it needs to be cost effective to sample, and prove honey is Manuka
2. it needs to address the market issues, ie if the extra cost and possible loss of value of Manuka honey now excluded from the market is higher then the gains in market goodwill then the approach is flawed
3. we believe there are inherent flaws in the end to end tracability of NZ honey and its not obvious that MPI's proposals in this space are adequate or well considered. We believe contrary to MPI's proposals the key weakness are in the way ECERT has been rolled out to record honey from Harvest (which it does not) to blending to final packaging. A fit for purpose system would clearly show what batches and or drums are added to each batch, what degree of Manuka was in each and how the Manuka attributes are modified at each stage of blending and/or storage. As storage is one of the key elements that impacts not only value, but also quality of Manuka, the ECERT system, if it was fit for purpose, would cover this. Once the honey is exported this information would show to any regulatory body where the honey has come from and how it has been modified and this would allow immediate assessment as to whether it has been modified
4. We remain unconvinced that the proposals MPI are making will reduce Manuka Honey fraud that may occur in jurisdictions outside of MPI's control. We believe it will still be possible to adulterate NZ manuka honey offshore, and also possible to export low grade Manuka as "Bush Honey" and then modify it and certify it offshore under existing foreign testing regimes. Large amounts of low grade NZ Manuka has been bulk exported from NZ in the last 12 months implying that there is no quick fix to what is going to appear in foreign markets.
5. We do not understand why for the last 5 years Bulk exports of NZ Manuka have been allowed when clearly many of the market issues are a result of Manuka being adulterated overseas. It's unclear whether these proposals will close the regulatory holes both in NZ and overseas that allows Manuka to be aduterated.

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 we are not an exporter of final destination, and as we batch honey rather than test every drum, we believe the additional testing that we will be required to do in order to sell honey will cost an additional \$1-5K per annum but could be much higher (this process does not recognise that honey may need to be tested 3 times before final export, the first being to identify if it has Manuka, the second after it has been aged to agree final price and then when its blended by the final export body to confirm the blend is eligible for export).

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.

AP Ecert costs are currently very time consuming and non user friendly (predominantly as the system was not designed for beekeeping when it was previously implemented). We have supplied many submissions on this in the past.

Until an initial Manuka 3in1 test is carried out in a laboratory, beekeepers do not know if honey has sufficient Manuka in it to bother validating the quality. Our preferred process would be that drums or batches have a 3in1 test and if the DHA is under a certain limit a profile test is required. Final exporters should be required to prove the batched sample has met the Manuka profile.

Currently we interim label honey drums as Manuka until the DHA/MGO is known, and before the honey leaves our premises it is relabelled based on the results. Under current regulations it is not our responsibility as the RMP holder to test for Manuka (although we typically co-ordinate this process), but it is our responsibility to label the honey drum. This is a gap in the process. In certain seasons a large volume of low quality Manuka is typically present, therefore the cost of the testing regime and culling out the batches that do not meet the grade could be significant.

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)?

Administration costs are already significant primarily due to the paper based harvest declarations and manually tracking honey. An end to end tracability system that linked harvest declarations to transfers electronically and also the test results would resolve alot of these issues and we have previously submitted this information.

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:

We disagree for the following reasons:

1. Honey leaving NZ is already extensively tested for C4, including before it is sold from the primary beekeepers
2. As mentioned previously there is no published research that we have seen as to the origin of C4 contamination in honey that has been tested overseas..
3. There are known issues with C4 testing of Manuka which are not addressed by this GREX.
4. Bees can be starving one day and the next day the honey flow has started, it is not practical to say just because the honey supers are on we don't feed them
5. A large percentage of beekeepers now run a single brood box system that involves pushing the queen into the bottom box by late November, up until this point the second box is a brood box. Its therefore meaningless to define a honey box as this will impact a large percentage of the national crop (as this crop comes from what was the brood box in the early/mid spring)
6. Beekeepers are already aware of overfeeding of bees and contaminating honey due to the testing regime, it is very costly to have batches rejected due to contamination and this is sufficient deterrent
7. It's impossible to police

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

1. Synthetic miticide treatments are licensed. Perhaps beekeepers should be licensed in their application and subject to a level of auditing. The reality is NZ has an increasing issue with Varroa management due to poor rotation and chemical options and increasing hive density. There is limited investment happening in this issue period. Better options would reduce this issue or eliminate it.
2. C4 sugar is already tested, yes contamination can occur but its generally a mistake. Some operators were caught several years ago using Sucrose to artificially bulk honey volumes, they are largely known in the industry.

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:

1. Synthetic chemicals are a different issue, our experience is they are present due to inherent bad practices such as leaving varroa treatments in hives during the honey flow, and we would suggest MPI need to do more analysis before assuming they are present due to the build-up of chemicals in brood boxes (although we do agree this can be an issue)
2. there are other issues impacting on residues, such as the practice of pricking frames and not removing wax every year which is currently an increasing trend with honey extracting
3. There are only 2 synthetic chemical families currently approved in NZ, one of which has resistance issues, the other is not far away. Unless more synthetic chemicals are approved this will be a declining issue as the other options are largely organic treatments.
4. We don't see in practice how this works with organic treatments or whether this is a concern with these chemicals
5. Is there any research on chemicals, we pay annual levies for residue testing but have not seen any results (ever)
6. some beekeepers do not use queen excluders so how does one define honey supers?

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

1. Synthetic miticide treatments are licensed. Perhaps beekeepers should be licensed in their application and subject to a level of auditing (eg farmers who harvest deer velvet).
2. The reality is NZ has an increasing issue with Varroa management due to poor rotation and chemical options and increasing hive density. There is limited investment happening to address this issue period. Better options would reduce this issue or eliminate the need for synthetic chemicals. The reality is both chemicals used today only have a few more years of economic use as the primary treatments.
3. while this was an issue in 2013, what data says it is still an issue (as we have not seen the results of the residue testing)

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 is a wide range of markets for NZ honey. With the \$180 registration charge MPI have made it prohibitive for smaller hobby beekeepers to sell their honey to an RMP holder. RMP holders typically have premises designed to handle large amounts of boxes and are not setup to process small batches. For this reason it is more appropriate for small batches to go through a facility that has a lower standard of certification. Whether or not this then means risks are introduced for export is really for MPI to assess.

☐ I disagree because:

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

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:

No, we believe MPI should be working with the minister to change the privacy laws and give them access to the beekeeper registration process required for AFB. It's ludicrous to introduce a parallel registration process. A simple privacy waiver letter asking for details to be shared and reminding beekeepers that if they don't they will be subject to an annual \$180 fee would resolve the privacy issue.

We have separately provided feedback on this and the categorical gaps and failures of this process to achieve a meaningful outcome. Please refer letter to Nathan Guy from ^{s 9(2)} _(a) dated 13 Sept 2016 on behalf of the Southern North Island branch of the National Beekeepers Association.

We don't believe the current process is required for the following reasons:

1. Harvest declarations have the beekeeper's details. The fact they are paper based and stored at the RMP holder is MPI's issue to resolve. If these were online, MPI would have their database of who is sending honey for extraction and sale.
2. the registration process will not prevent harvest fraud as detailed in the letter of the 13th Sept. This is also related to the fact harvest declarations are paper based.
3. RMP holders are already responsible for holding records for recall etc
4. contact details are already held in the AFB database and could be made accessible for mailing regulatory updates by changing or providing a privacy waiver

The current cost of registration is encouraging small beekeepers to extract their honey in non registered premises and will in the long term increase the risk of Tutin poisoning from

road-side stalls.

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

Make beekeepers provide harvest declarations online linking in their AFB PMP registration code, their geocodes and their boxes harvested, and secondly allow the RMP operator to access a subset of this form to input the batch ID and the tutin test results. Then this form ID can be linked to ECERT providing end to end traceability.

If you did this many of the proposals in these submission would be redundant and you would have a national database of honey yields linked to geocodes for full traceability.

It's perhaps 2x 1 page forms that can be interfaced to the existing Apiweb database via an API. What MPI is proposing is further workarounds when what needs to happen is to fully develop the existing processes and move these online.

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:

We disagree for the following reasons:

Beekeepers have many thousands of boxes. Some are on pasture honey sites, some are on manuka sites. Some go out many times. Some get burnt, some get destroyed. There are currently several systems offering capability for tracing boxes. As far as we know it's unlikely they are interoperable. As an RMP holder, how are we supposed to interface to these systems to trace honey once it enters the processing environment. How do we link in batches and then link it to ECERT. It will be a technical disaster, who will implement it and who will manage it. What happens if the provider of the system goes broke. What MPI are suggesting is as complex as the rollout of the NAIT system, it will need to support boxes being sold to someone, the list goes on.

And who will pay for it, some beekeepers don't even have a smart-phone.

And what exactly is the objective of this requirement, so we can trace honey to the exact location? This is what harvest declarations are for. Beekeepers harvest apiary by apiary. They know when they bring honey in where it came from, the issue today is the MAF ID's are hidden in APIweb and they have to pull them out and put them in a paper form.

Right now all RMP operators have similar issues with beekeepers presenting lots of honey without having the details on hand to complete a harvest declaration. These should be filled in online before the days harvest or at the RMP premises. This would eliminate any issues with incorrect MAF IDs and allow the actual record to be linked to ECERT and the

AFB database which already records all apiaries. It would also provide MPI with contact details. Right now Harvest declarations are kept on premise at the RMP operator and are not readily available or can be cross referenced easily.

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

Move Harvest declarations on-line

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?

The costs will be enormous, for our business alone we would expect it to cost \$40-50,000 and an annual cost of 5-6k.

We believe its unworkable at a RMP level without a standard platform, support and maintenance. We do not see what benefits this system will provide and its likely to be widely mis-managed.

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:

We agree that honey originating from NON RMP registered premises should require a Harvest Declaration.

We don't agree that RMP operators require harvest declarations as we are already known to MPI and audited which is consistent with tracability. Our Harvest records are scrutinised probably more then the 3rd parties that we extract for and are always available. The reality

is we do complete harvest declarations, but they are taken off primary records which are what is used for traceability during the extraction process. Requiring these to be filled out upfront when we are the traceability control point is meaningless.

If however the system moved online we would support this simply because it would reduce paperwork and provide a consistent dataset.

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

Move harvest declarations online and link these to ECERTs. It will then be immediately obvious what honey is traceable.

We have separately made a number of comments to the AFB 5 year plan (which we participated in) that highlight the benefits of managing the AFB plan if harvest declarations were moved online. These are primarily around identifying beekeepers who have unregistered sites and/or are selling stolen honey and completing false declarations

We also believe there are significant gaps in how honey is traced through the blending process. In theory ECERT manages this process for honey that has official assurance, I would challenge this assumption. If a range of final product is sampled in an overseas market, how easy is it to use ECERT to find out

1. how many drums of honey were blended together to make the specific batch that was packed
2. for Manuka, did all the honey that was blended include honey that showed evidence of DHA or MGO
3. which beekeepers supplied the original honey and where did it come from
4. do the sites that supplied the honey have a history of producing Manuka.

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:

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

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:

We support universal transfers only on the proviso that it is done via ECERT on the condition that ECERT is developed with industry to be fit for purpose and that the charging regime reflects the realistic costs of managing the system. ECERT is currently cumbersome with no offline form capability, has important information loaded in free txt, it does not validate important attributes and the charging regime from autitors is monopolistic and un-necessarily expensive for primary extractors. So while we support moving all of this online, unless MPI address the shortcomings of the current system our feedback is no.

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 Industry

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:

We believe the definition needs to be in the market for 12 months before being formally adopted. So yes we do support this on the proviso that industry sees value in it after a 12 month trial. We don't support this being adopted within MPI's short timeframes.

We believe there are significant gaps in the GREX proposal, including the process where Manuka is aged, and also how fermentation or shelf life is managed.

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

Other options could be as follows:

- honey used to create batches for final packaging must have at least a DHA of 100 or MGO of 60, plus appropriate colour and the final batch must have NPA 4 (or equivalent DHA) to be called Manuka
- maximum unit packaging size for export is limited to 1kg

It's widely known in the industry that some honey packers are blending non-manuka honeys with low DHA/MGO Manuka. Some simple rules on what is allowed coupled with a ban on bulk honey exports may address many of the issues this proposed GREX raises.

We believe these measures should have been implemented circa 2014

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:

Test results should be in ECERT, there should be no-need to ask an operator MPI need to assess what Inventory is currently held in NZ to answer this question. Anecdotal feedback from packers is that this is a major issue and unrealistic.

☐ I disagree because:

☐ I have concerns because:

The 2016 season arguably produced a large volume of lower DHA Manuka which is anecdotally still in storage and may not comply with the new test regimes. This in turn will impact price and also the ability of the industry to profitably clear this inventory.

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:

We believe that the word Manuka needs to belong to the NZ Honey industry and any trademarks used by individual businesses and any other interests or rights are secondary to the industry's interests.

☐ 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:

This is sensible, however we believe the ageing of Manuka needs guidelines such that MGO levels do not crash after it has been packaged. We also believe if the honey is packed and aged offshore there is no way to assure that the MGO levels are true or likely to be true within a reasonable shelf life.

☐ I disagree because:

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

It's unclear as to whether the new markers will be used to advertise the quality of monofloral manuka. We therefore believe its appropriate to let the industry take the new standard and test results and assess how it will be used to define Manuka Honey over the next 12months. MPI will then be in a position to assess exactly how this will or should work with existing grading systems.

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

Yes, we believe MPI should have provided more guidance as to the relationship between the markers and DHA/MGO, ie at what levels of DHA/MGO are the markers going to be present. We are currently hearing that excellent quality Manuka is failing the test so we therefore reiterate that the science needs to be proven for at least 12 months before any formal implementation into regulations.

In addition, its unclear given the industry values Manuka based on its Activity, whether the new standard should be focussed on primary extractors or end exporters, ie it may make sense that achieving the standard be left to those who blend honey for export, thereby saving the rest of the industry from investing in tests that may not significangtly impact the market value of their individual lots of Manuka. How all this is going to work is currently very unclear and the current tests are expensive

There is some concern that the difference between multifloral and monofloral manuka is determined solely on one chemical, which is available synthetically therefore introducing the very likelyhood that Multifloral manuka will be fradulently upgraded to monofloral once

it has been exported in bulk.

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

It may have been worthwhile to produce a corresponding test for Kanuka while this process is being considered, given the investment by MPI in this process. This is a lost opportunity.

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:

Yes but only as an interim guideline until such time as sufficient information is available to validate the testing and its impact on industry. It's unclear from the proposals how the end to end process of validating Manuka is expected to work. As previously mentioned, primary extractors will typically carry out a 3in1 test to validate whether Manuka is sufficiently present, at this stage some exporters who may purchase this honey are also requiring a marker test, however once the markers and what influences them is better understood perhaps this is not required. It does not appear that this is required by MPI's proposals

How these markers behave with ageing needs to be better understood

☐ 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?

In a season when Manuka is lower quality we would expect the testing costs to be significant but it depends on how the Honey packing industry interpret the new regime and whether it becomes a defacto requirement for all Manuka.

Do you have any suggestions for minimising any impacts?

Propose some guidelines for primary honey extractors looking to sell to a exporter

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:

There are many aspects of this proposal that will take years to implement, therefore while we are supporting of the chemical markers being implemented as a draft we do not support the rest of the GREX being implemented in this timeframe. We believe it needs a substantial rewrite.

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:

Manuka honey can be aged for anything from 12 to 18 months so this timeframe as a blanket rule is inadequate when inventory levels are reputedly high.

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).

As per initial feedback page 4-6

Submission #2 for Proposed General Export Requirements for Bee Products

s 9(2)(a)

s 9(2)(b)(ii)

13 June 2017

We have decided to provide an additional submission due to the discussion around MPI's proposals having moved on since early May. These comments should be read in conjunction with our previous submission.

Our main concerns at this point are

1. the cost of the various testing that is being proposed
2. the overall approach to managing Manuka to standard
3. Where the discussion on tracability has got to

With point 1, we believe the cost of testing is getting beyond reasonable, and further proposals from Apiculture NZ to include *Leptospermum* make this situation more unpalatable. Current costs for the 3in1 manuka test plus C4 sugars are \$100, plus MPI Chemical Markers and DNA is approaching \$300 plus GST, which on a per drum basis is just uneconomic for Honey that has less than ~NPA7, which in many years is what is achieved in our area. While MPI's approach may be scientifically accurate it, this needs to be weighed against real world economics.

Regarding point 2, it has become more apparent that MPI's strategy is to use the new standard, in conjunction with more definitive information from volumes in ECERT, to confirm NZ's Manuka crop per country of export. This then leaves overseas regulators to manage manuka fraud in their own countries as they see fit. We don't believe this addresses the industry problem of fake manuka, and we also believe industry is expecting more than this as the end outcome. Industry is expecting that at the conclusion of this project Honey jars that consumers buy will be tested and be traceable and the product will be authentic. What is proposed is unlikely to achieve this, as bulk honey will be still be available overseas for ongoing manipulation and this appears likely to be permissible under the new standard.

With respect to point 3, there has been substantial discussion around traceability at the beekeeper end. However there is very little about how honey jars, brands etc are traced back to NZ once the honey has been sold. This in our view is the gap in the work to-date. Brands that are packed in NZ to-date are not recorded in any central repository by MPI that is available to the general public (or at all), and its not at all clear what level of official assurance the end product has been subject to. It's our view that any Manuka that is sold as 'Made in NZ' needs to be packed here in retail packs, and all the labelling needs to comply with the standards and this should be in an approved database that is publicly accessible. A quick search of Woolworths Australia will demonstrate multiple non compliances from a raft of companies¹ including some that should be subject to existing Guidelines.

Summary

We have read with interest the work Peter Dearden from Otago University has done with profiling a range of pollens to prove honey is from NZ. We believe this has substantial merit, and with MGO and or *Leptospermum* may well provide a very robust definition at a lower test cost. We think this needs further investigation.

We reiterate that we believe the existing traceability process with harvest declarations needs to be moved online asap and no new processes are required. There are a number of drivers for this:

¹ refer <https://www.woolworths.com.au/Shop/Browse/pantry/breakfast-spreads/honey>

1. it removes the ability for fraud through individual beekeepers supplying stolen or non compliant honey to multiple RMP's who do not share the same auditor
2. it provides MPI with a detailed profile of the honey crop and with appropriate privacy changes. This can be integrated with the AFB database to also profile beekeepers declaring large volumes of honey from a small number of registered hives
3. harvest information can be integrated with ECERT batches to link beekeepers to batches which is currently done at each RMP premise on a proprietary form (which is never seen except by the auditor)
4. this will ultimately allow faster traceability and make it extremely difficult to sell non compliant product.
5. we don't believe a paper declaration has any special meaning to the average beekeeper, most are oblivious to its legal status and do not know how to complete it.

We also would argue that traceability should be expanded to include market brands of end product, ie anything that claims to be made in NZ should be publically traceable to a public database that shows who the company is, where it is registered, and which RMP processed or packed the product. The recent media profile of a company called "Unibale" is a case in point (who are they, where are they registered, who packs their honey??). We believe over time if this was correctly implemented there would be a gradual shift to packing Honey in NZ under a brand NZ, quality assured model. Simply releasing a testing regime will not stop the issue with overseas honey fraud, of which several new opportunities are available under the current proposal. In addition, from what we have seen on the internet, there is widespread non-compliance with the labelling guidelines.

Lastly, we have made a number of comments re the storage and ageing and condition of Manuka honey and the absence of anything in the GREX to record and manage this. We believe this is a glaring gap in the proposals as is any specific work to address moisture, fermentation and how this is managed by industry to-day and whether this is acceptable under CODEX.

Regards

s 9(2)(a)

Nathan Guy
The Minister of Primary Industries

Un-necessary Regulations.

Yet again on your watch has NZFSA used Regulations to over come a small problem in the beekeeping industry. This time to try and stamp out a small proportion of offending but as a consequence the cost is borne by the majority of beekeepers for very little gain.

I am referring to the Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products: 25 August 2016

I request under the Official Information Act the cost benefit analysis information for each section of this regulation.

In my submission on Strengthening the regulatory framework for bee product exports, I ask how much honey was being stolen and did this justify all the additional costs it would put on small commercial beekeepers.

I am sure that NZFSA took this proposal and got approval from the Bee Industry Standards Council. This council is made up of a majority of packer- exporters understand the ramification for exporting but have very little knowledge how it would affect smaller beekeepers.

Anybody with a few brains which criminals have, can work there way around these Regulations simply because harvest declarations (although a legal document) are not a very good assessment of production. Honey production varies between beekeepers and areas as microclimates just a few kilometres away could have more favourable conditions and therefore produce a greater crop. Also the Apiweb hive records for an apiary, it is only true on one day, 31st March each year. At any other time its inaccurate as beekeeper move hives from apiary to apiary chasing flows.

Honey thieves can provide the compliant harvest declaration and take stolen honey frames to a number of different RMP operators to get it extracted. The number of supers just has to match the number of hives to allay suspicion but as stated earlier, this is subjective as some beekeepers are better than others in preparing their bees for a honey crop. Harvest declarations are checked to verify they are filled in correctly but the number of harvest declaration produced by a beekeeper are not checked against different RMP operators.

The fact is that only a few of our markets require the quality assurance from apiary to export. Honey from a Local Body Registered Honey House can be sold locally or can be exported to other countries so is another work-around.

Registering Beekeepers. Another way is to register hives in the name of a family member. We had this situation when we had the Honey Levy Act. Beekeepers with

more than 50 hives, registered hives under their children's names. Another needless piece of regulation when it's already done for Biosecurity purposes.

In a previous complaint I made to the Prime Minister when Regulations were proposed to get over a computer problem, the report I was told showed MPI had a proliferation of small independent computer programmes running.

Registering beekeepers on another independent database is yet a continuation of this mentality and culture and can lead to overseas buyers going straight to the producer for honey as happens with RMP holder now. Surely MPI could have used Regulations to extend read only access to the Apiweb from the Biosecurity area to the Food Safety area within MPI instead of creating yet another database where anybody with five or more hives (anybody producing an excess of honey they cannot or choose not to market locally) has to register to be able to on-sell their honey to an extractor all for the absorbent fee of \$176 per year. (I can't verify this figure as nothing happens when you click on Beekeeper Listing). From the outside this just looks like NZFSA is using regulations to gain more money for the Department with very little gain to obtaining the intended objective.

In stead of registering everybody, perhaps MPI should be profiling errant beekeepers. Those that breach the AFB PMP regulations are just as likely to breach food safety regulations. Concentrate audits on these.

Increasing the number of audits of RMP premises goes against best practice. This regulation indicates to me that NZFSA do not have confidence in the auditors, some of whom are their own staff. If a business showed compliance by not having any non-compliance issues, you would think that MPI would have confidence that those managing the facility know what they are doing and are doing it well, and would therefore move them up the scale reducing the number of audits over time. To double the number of audits is costing operators an additional \$2000 if time is included and these are being undertaken when most plants are not even operating, just to try and track some stolen honey is a nonsense. This is a police operation and in no way affects food safety.

Again from the outside this is not targeted so must be purely a money gathering exercise.

I ask that you set up a review committee to look at these Regulations and who administers what and to sort things out within MPI so we have good science based regulations

s 9(2)(a)

s 9(2)(a)

I am writing this on behalf of the Southern North Island Branch who at the branch meeting on the 11 September have approved and support this letter.

From: s 9(2)(a) .co.nz>
Sent: Saturday, 6 May 2017 11:25 a.m.
To: Manuka Honey
Subject: Submission

Hello,

My name is s 9(2)(a), I am a hobby beekeeper with a keen interest in the well being of the NZ honey industry. I attended the MPI meeting in Hamilton yesterday.

My concern is that the founding scope of the project is fundamentally flawed. Though the presenter said that the overseas markets want and require us to create a method to authenticate manuka honey (as a food?), in fact I believe that those overseas officials or agents are not correctly asking for what their constituents truly want.

The high prices being paid overseas for manuka honey are not being paid because it is "manuka" honey, but because coincidentally some manuka honey has non-peroxide antibacterial activity (active). That is all and that is it, period! It is not that the honey has a particular flavour or smell or colour that interests the overseas buyers.

So in fact, the regime you are considering using to identify monofloral and multifloral manuka honey will over a short period of time destroy the overseas markets for manuka honey. Why? Because not all manuka honey is active, and the levels of activity of active honeys vary. So when the purchaser buys the now authenticated manuka honey, and the honey does not do what they expect it to do, manuka honey will be decried as a sham, when in fact by your definitions it is manuka honey. It just isn't active.

If your definitions do not include a measure of MGO it will be a disaster.

Kind Regards

s 9(2)(a)

[Not relevant to request]

From: s 9(2)(a) @yahoo.co.nz

Sent: Wednesday, 3 May 2017 3:18 p.m.

To: s 9(2)(a)

Subject: Re: Manuka Honey consultation and Beekeeper Listing

Hi s 9(2)(a)

On the manuka honey my feeling is that all bulk honey should be processed
In new zealand and the exported honey should go out I
in processed containers I.e

I.e 250/500 and 1 kg containers this would stop any adulterated honey going onto the overseas market as it
would have to be labelled and bottled in new zealand.at Present they buy bulk one drum add two drums of
their local honey then blend as new zealand manuka and sell at a premium.

Regards s 9(2)(a)

[ail on Andro](#)

[Not relevant to request]

From: s 9(2)(a) .org>
Sent: Monday, 8 May 2017 12:45 p.m.
To: Manuka Honey
Cc: s 9(2)(a)

Subject: BAN THE TRUCKING OF HIVES AND BEES IMMEDIATELY!!!!!!!

Follow Up Flag: Follow up
Flag Status: Flagged

KIA ORA

DROP THE MANUKA "STANDARDS" PROJECT NOW!

Myrtle Rust has caused a huge credibility issue for "manuka" per-se and continued expensive promotion of questionable standards, (that will be attacked by competing nations) to a sceptical global audience that has reacted very negatively to the arrive of myrtle rust in our Moana nation is doomed to fail. Already the project has confused the industry, cost them a heap of money and now with myrtle rust there is NO clear pathway to effectively trying to create a government mandated / supported commercial oligopoly that will marginalize smaller honey operations / operators across the nation. All in a doomed attempt to falsely inflate the "value" of manuka honey – a honey that our own Consumer magazine has stated has no evidence of beneficial antibacterial efficacy when consumed! – to quote:

"There's no hard evidence manuka honey has proven antibacterial benefits when eaten"

BAN THE MOVEMENT OF HIVES & BEES

- Hey, bees don't look at restricted areas and quarantine zones.
- They can fly up to 12 kilometres in one day.
- While MPI workers are restricting ground-movement, bees are happily flying above their heads in all directions.
- Imagine the havoc that one hive can create when the infected bee interacts with its fellow bees in the hive.
- Bees that will head off in all directions – carrying the pathogen with them!
- Get just one infected bee out of Northland in a hive trucked into our rohe, and overnight the disease is here!

BAN ALL BEE HIVE / BEE TRUCKING NOW!!!!!!!!!!!!!!

My whanau, hapu and our Iwi want it stopped NOW or our group will take action through our Maori Parliament to stop it under Tikanga Maori and Te Ture Whenua Maori Act 1993.

Nga Mihi

s 9(2)(a)

A large rectangular area of the document is redacted with a solid grey fill, obscuring several lines of text.

– phone me at any time for a korero about this issue.

[Not relevant to request]

Released Under the Official Information Act 1982

9 June 2017

Attn: Minister of Primary Industries: Nathan Guy

Dear Sir,

Re: MPI Definitions of Manuka Honey

s 9(2)(b)(ii)

I have seen huge changes over the years, mostly very positive as consumers around the world came to like New Zealand's iconic Manuka honey. I agree that a tidy-up of definitions of Manuka honey is currently warranted.

However I am shocked that the way MPI is undertaking this exercise, is putting a large amount of the industry at risk.

Please consider the following points:

1. Have you as Minister in charge of MPI ever asked MPI whether they have done any analysis on the impact on the honey industry as it currently operates, of their proposed new Manuka honey definitions?
 - a. If you have asked MPI, what was their answer?
 - b. If you have not asked them, then we request that you please urgently do so
2. If you have previously not asked MPI and you now do so, and MPI responds that they have not done any such analysis, then we request that you require them to immediately cease any further work until such analysis is done. See section 4 below for our reasoning
3. If you either already have asked MPI the question, or if you now ask them, and in either case/both cases MPI's answer is nil or minimal impact, then we request that you require them to immediately cease any further work until the beekeeping industry is able to review and comment on their analysis
4. Minister, the reason for our quite blunt comments above, is that the current proposals would have a significant detrimental effect on the beekeeping industry. **Current proposals from MPI would result in approximately 30% of the top grade export Manuka honey being unable to be classed as Manuka honey.** This is based on packed retail units and drums held in store not nectar or new season's unprocessed honey. Such an impact would massively undermine the industry, for instance job losses, export revenue losses, and so on

5. I am sure that you can understand that where an industry could have 30% of its highest value products classed as low value, at the stroke of an MPI and government pen, then that industry would fight very hard. One of the worst effects of MPI's current approach is that global customers will see the New Zealand beekeeping industry at war with MPI and the Government. This in itself would lead to significant customer and consumer negativity towards Manuka honey
6. We believe that the problems in the review exercise have arisen because **MPI gives insufficient recognition to commercial implications**. It appears that MPI is off on its own, taking a bureaucratic and/or scientific approach, with no heed of the commercial context or commercial consequences. Underneath it all, Manuka honey is a commercial product, it is not a scientific process
7. By analogy, we understand that another industry has been detrimentally affected by MPI ignoring commercial consequences (though they would probably try to argue against this). We refer to the infant formula industry, where China has dictated policy, and MPI has just followed that line, to the significant loss of New Zealanders' participation in that industry. As an example, we understand that MPI immediately promulgated the China 3 brand policy, whereas in contrast in Australia their approach was to say that the Australian industry should continue as it chooses (eg with multiple brands) until China actually changes its laws
8. We strongly believe that MPI's approach to the Manuka honey definition exercise should be re-aligned. **MPI should be instructed to:**
 - a. Clarify, tidy, and make more accurate and specific, the Manuka honey definitions;
 - b. But within the parameters that what is currently sold as a given UMF grade (or other grading system), continues to be able to be sold under that grade
9. We strongly believe that it is part of MPI's role to support and promote New Zealand exports. MPI should not just seek to push through regulatory change which could materially reduce exports
10. There is a particular irony in this whole exercise:
 - a. There is little current science to show that ingested/eaten Manuka honey has significant health benefits (as opposed to say external wound dressings). Honey producers accept this, and so make no claims on labelling, etc
 - b. Therefore the consumer attraction towards Manuka honey is a mystique, it is in consumer perception. This is similar to say A2 milk versus standard milk. It is also similar to how consumers pay huge premiums for say skin creams, where the true benefits of such products are marginal. In these analogous areas, MPI or other regulators do not carve in to undermine that consumer perception
 - c. The irony in our Manuka honey case, is that **MPI is seeking to impose science-based standards in defining Manuka honey, where as stated above consumers do not rely on science for their interest in and perception of the**

Manuka honey product. There is a whole level of subtlety in the situation, which MPI misses

11. There is a simple practical solution: MPI should drop the DNA testing and stay with the 4 markers that test the levels of Manuka honey based on the present testing. This will maintain the maximum amount of Manuka honey suitable for export

We would be happy to provide further discussion or information.

I would like to acknowledge s 9(2)(a) for assistance in drafting this letter.

Yours faithfully,

s 9(2)(a)

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