

[Not relevant to request]

From: s 9(2)(a) gmail.com>
Sent: Friday, 2 June 2017 11:18 p.m.
To: Manuka Honey
Subject: Proposed General Export Requirements for Bee Products

Follow Up Flag: Follow up
Flag Status: Flagged

Submission on MPI

Proposed General Export Requirements for Bee Products

s 9(2)(a) – Beekeeper

s 9(2)(a)

s 9(2)(a)

Salient summary of significance:

Part 4.1 Pre-processing traceability requirements

The requirement of beekeepers to indelibly mark and number each honey super and record where they all go is completely unnecessary time consuming bureaucratic idea that will provide no new more useful information than the information that is already recorded and signed for by beekeepers on their existing Harvest Declarations.

NB: Honey is stored by the bees in frames not boxes. The frames are usually sorted as to variety prior to honey extraction, so box numbering would become irrelevant and misleading.

Answers your numbered Questions:

1. Beekeeper
2. 5-10years
3. Animal Products Act 1999, Food Act 2104, etc, as a beekeeper [not an operator]
4. 51–500 Hives
5. Tasman and Marlborough regions
6. Sole practice
7. The introduction of a science based Manuka definition that can verify Manuka overseas is an excellent idea that will bring confidence to the industry. But the honey super traceability requirements will slow my business, and waste a lot of my time on frustratingly unnecessary duplication of paperwork.
8. The new laboratory analysis will add costs to my business
9. The requirement to be both MPI registered and licensed adds to costs.
10. Agree
11. Agree
12. Agree
13. Agree
14. Strongly Disagree – Honey bees and consequently beekeepers collect a range of honey varieties. Manuka, Clover, Kamahi, Beech, Rewa Rewa to name a few. These different honey varieties can often be collected in the same apiary. The beekeeper sorts the frames by variety prior to extraction so that each variety is enhanced in its purity and subsequent value.

Most beekeepers will know how many boxes of which honey variety they collect off individual apiaries. But the individual box numbers would be irrelevant after the sorting process.

The honey extraction process combines a large number of honey frames usually of a particular honey variety from many boxes from a number of different apiaries. The frames do not usually get put back into their original boxes after extraction.

The idea that beekeepers or operators could record the volumes of honey harvested from individual supers or individual apiaries is simply totally impractical. It is ridiculous.

However the total number of honey supers taken off each apiary would be simple to record and in fact most beekeepers want to know this for apiary productivity reasons.

15.0 The suggestion that honey supers should be individually numbered would be extremely time consuming and tracking the individual boxes a frustrating waste of time especially considering that the resulting information would at best tell you exactly what is already known and declared on the beekeepers Harvest Declaration - the source of the honey. This idea of individual honey super numbers and tracking will greatly increase costs.

16.0 Agree with Harvest Declarations requiring the total number of honey supers collected from individual apiaries but Not the requirement for individual box numbering. Assuming that the total number harvested information is kept secret as it would be commercially sensitive.

17.0 Disagree – the costs for most businesses of individual honey super numbers and tracking would be horrendously onerous and a frustrating waste of time providing unnecessary information that is already collected and recorded on Harvest Declarations – the source of the honey.

18.0 Agree

19.0 Agree

20.0 Agree

21.0 Agree

22.0 I tend to Disagree with this because a large part of the international problem is that customers are confused by the different grading systems.

23.0 The proposed Manuka honey definition should reinforce the existing grading systems, and perhaps give them more credibility being backed by science. But things would be far simpler if there was just one internationally recognised grading system.

24.0 / 25.0 This science based definition needs to be robust and accepted by NZ beekeepers as such.

The current problem of some 'high grade' Manuka honey failing the DNA test is probably due to the poor Manuka season we have just had and maybe the optimistic hopes of some beekeepers who do not accept that what the bees have collected is not Manuka. Yet also bees do not collect so much pollen from Manuka.

26.0 Yes, 27.0 covered already, 28.0 Agree, 29.0 Yes,

30.0 covered already

Thanks for your time and consideration.



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:	§ 9(2)(a) <input type="text"/>
Your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it:	§ 9(2)(a) <input type="text"/>
Your contact details (such as phone number, address, and email):	§ 9(2)(a) <input type="text"/> <input type="text"/>

General questions: getting to know you

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

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

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

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

3. Do you operate under:

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

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

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

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

Central North Island

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

- ☐ 0
- ☐ 1 – 5
- ☐ 6 – 19
- ☐ 20 or more

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

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

Impact of compliance costs for beekeepers, processors and exporters

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

If the current proposal goes ahead, and we for one hope that they do not, will probably trebble or more our current compliance costs due to the onerous provisions in the draft document.

1. As a contract extractor, having to sign that a beekeeper's harvest statement is true will mean that we will need to become aware of exactly where a beekeepers site is and require proof that what they have harvested does come from that site (photographic records with apiary location on each super or the equivalent) – otherwise I would not be willing to sign a document that I am then held accountable for and could be prosecuted for false information supplied. This I consider is commercially sensitive information that beekeepers will not want to divulge in case another beekeeper moves into their area and alongside their apiary.

2. Provision of tracability of all honey supers on and off hives will mean there will be a need of extra storage space for supers for each individual apiary. Numbering of all supers and the purchasing of scanners or other means to keep track of super movement. We think this achieves nothing other than MPI gaining commercially sensitive information on production etc that does not enhance the current export certification of bee products.

3. Non-movement of brood combs will probably be the biggest impact on our business. This allows beekeepers to make splits to make up overwintering losses, nucleus colonies and as a measure for swarm control – the latter is most important, otherwise there would likely be huge numbers of phone calls for swarms in the spring and autumn and a subsequent drop in honey production from those colonies. The work undertaken by beekeepers to get hives to peak production are complex and not likely to be understood by MPI. We see no value in this, as even though it was hinted that this was a means to limit residues in honey, if you look at the residue testing results from the last few years, the two positives would hardly call for such extreme measures to be imposed on beekeepers.

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.

Clause 3.3 will affect us as an operator, as we will need to check on the MPI website for the beekeeper listing in order to include that on the harvest statement or refuse to undertake the extraction because the beekeeper is not listed.

Part 4 – as indicated above, changes in tracing supers will involve direct cost to implement the draft proposal – very few beekeepers will have in place a record system to trace all supers and where operations have this in place it is currently being used more for tracability for American foulbrood control.e.g. corporates who are employing low skill level beekeepers to produce honey.

Clause 5.1, 5.3, 5.6 testing to determine if meet the Manuka standard – costs of testing.

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

Costs of storing honey supers in apiary lots between harvest seasons will be increased as more storage area will be required to meet the proposed changes. For large beekeeping operations this could double the storage area needed.

If sugar is not allowed to be fed while honey supers are on hives – this will require some beekeepers to change management practices completely. Sugar stimulates the queen to lay better than feeding honey back to hives – it is more cost effective to feed sugar than honey. Feeding of honey and pollen back to hives rather than a substitute also increases the risk of spreading American Foulbrood and thus means increased costs for destruction of hives with clinical symptoms of American foulbrood. The risk of spread is almost as high as shifting AFB contaminated brood frames around. The cost of destruction is a significant one – by the time you have dug a hole to burn the hive and burn't it component by component - it can take several hours to burn 6 hives with honey supers on.

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:

The placing of honey supers on hives is a management tool to allow for the expansion of the bee population – the super may be placed on the hive more than a month before the honey flow starts, and due to the vagaries of nature, you never know when the flow will start – you can get an idea from historical data, but each microclimate will be different. So sometimes a beekeeper is forced to feed sugar to keep alive his/her production unit until the honey flow starts.

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

We would suggest that where testing is done on a beekeepers honey and additional sugar is found, then an investigation should be undertaken on sugar usage in comparison with other beekeepers in the area – if it is found to be excessive then action should be taken – prosecution, suspension of export eligibility. Again if synthetic chemicals found action should be taken if a beekeeper is found to be not removing varroacides for example from their hives at the appropriate times,

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:

When a beekeeper does not use queen excluders, it is hard to define what is the brood chamber as the queen has access to all boxes – so does that mean a beekeeper can not harvest any honey??

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

We think that you would find most of the beekeepers who have been in the industry a long time that they are doing what they need to ensure that varroacide does not get in the honey. We have had Varroa being treated for 17 years now without major resistance problems – this differs from other countries that found resistance within 10-12 years because beekeepers were taking shortcuts and concocting their own treatments. Those that have been in the industry for a long time have ensured they have alternated treatment chemicals and used organic treatments and have removed treatment material as and when it should be. From the results of the residue testing programme it would appear that varroacide contamination is not currently an issue. So maybe continued education of new

people into the industry may be an appropriate measure to ensure residues do not become a problem in the future.

Processors of bee products to operate under a risk based measure

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

☒ I agree because:

We think that this is wise so that all people exporting are subject to the same regulations and controls.

☐ I disagree because:

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

Bee products to be sourced from listed beekeepers

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

☐ I agree because:

☐ I disagree because:

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

We think that this extra listing may not be necessary, unless MPI have an additional motive for this that we have not been told about.

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 do not think any additional records are required – tracability back to the apiary is sufficient as usually several apiaries are combined to give an extraction run especially with beekeepers who run small apiary site numbers 15-20 hives per site.

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

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

The impact would be quite extensive, additional record keeping would be likely to require a further person to be employed part time to complete these records, otherwise efficiency in our day to day management would be compromised.

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:

All the required information is available from our truck diaries. As a beekeeper and processor, we complete one harvest statement for all extraction runs, as we do not usually sell any honey until the completion of our extraction season.

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

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

☐ I agree because:

☒ I disagree because:

We disagree because of what we have already outlined – the need to have greater storage so that honey supers can be stored as individual apiary supers, setting up individual honey super id and ability to trace every movement with scanners or long paper trails will be onerous.

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:

The current transfer document is not suitable for some bee products for instance batches of pollen may be processed over several days not consecutively. The pollen is dried as a batch from several apiaries (to ensure good nutritional value from several pollens gathered from several areas and different soil types), and then cleaned over several days. The transfer statements would need to be amended to allow for all bee products.

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

Labelling of monofloral and multifloral mānuka honey

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

☐ I agree because:

☒ I disagree because:

We disagree because we think that the other changes in the GREX are un-necessary and it would be better putting monofloral standards – currently Manuka but likely to be added to later with other monofloral criteria for other native species and clover etc – in a separate regulation.

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

We think that due to the reporting of 20% of high activity Manuka honey failing the current MPI test, that there is need for an urgent peer review of the science, with independent scientists used to review the science. It would appear that there are also some honey that is NOT Manuka that is passing the current proposed test – this tells us that the definition is still not robust enough. We had a willow honey dew sample procured (unbeknown to us) that was produced in an area that is close to Manuka that passed the test – it was not the right flavour, it was not thixotropic, it was not the right colour. We also know of another beekeeper who combined two non-manuka samples of honey that he knew possessed some of the markers used in the MPI test, and the result was that the combined honey met the criteria to at least be called multifloral Manuka. Again the honey did not possess the flavour, colour or thixotropic nature of Manuka.

The model used for the Manuka definition needs to shift from being a statistical model to one which takes into consideration the changes that occur to honey on storage, and if this affects the marker chemicals over time.

We think that if commercial beekeepers, and those that had developed grading systems for Manuka had been consulted in the first instance when MPI started on this definition, some of the potential problems would have been identified, before the research was undertaken. A sound definition is needed that covers all Manuka honey. Otherwise New Zealand's export industry integrity will be compromised.

We urgently ask that the peer review is undertaken, and any decision on the Manuka Standard and the alteration of the GREX is put on hold until the review is completed and further Consultation is undertaken with the Industry.

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

☐ I agree because:

☐ I disagree because:

☐ I have concerns because:

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

☐ I agree because:

☐ I disagree because:

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

☐ I agree because:

☐ I disagree because:

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

The current definition will mean a huge loss of income from the high activity Manuka not meeting the current definition. This situation means that the definition needs to be re-assessed and alternatives tested for the basis of a definition that covers all honey that is definitely Manuka.

All active honey of 5+ UMF and above must meet the definition (and the equivalent MGO ratings)

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

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

The definition must be re-assessed seeing as 20% of the high activity Manuka honey is failing the current definition.

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:

Manuka needs to be reliably tested however I would like to know what the regime will be for ensuring that the person taking the samples will be suitable trained – what will the training be??

☐ 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).

We consider that the draft Grex is not necessary given that most of the changes that affect hive management are not necessary and once those are removed the GREX would be substantially the same as it is currently.

We would propose that the monofloral Manuka standards be kept under separate legislation that could then have other monofloral standards added to it once the science has been done to define our other monofloral honeys.

We urgently ask that the peer review is undertaken, and any decision on the Manuka Standard and the alteration of the GREX is put on hold until the review is completed and further Consultation is undertaken with the Industry.

Released Under the Official Information Act 1982

SUBMISSIONS:***Clause 5.3: Restrictions in relation to labelling export honey as Manuka honey.***

1(b) label honey as 'multifloral mānuka', 'mānuka honey blend' or 'mānuka honey mixed with honey of other floral sources', or any other term that implies that the honey consists of a mānuka honey blend unless the honey meets the definition of multi-floral mānuka honey under clause 5.2.

*(2) To avoid doubt, where monofloral mānuka honey or multifloral mānuka honey is blended with honey of other floral sources, the **final blended product** must not be labelled as mānuka honey **unless** that final blended product meets either the definition for monofloral or multifloral mānuka honey under clauses 5.1 and 5.2 and is labelled in accordance with subclause (1) of this clause.*

SUBMISSION 1:

This relates to retail packaged honey only, in particular labelling:

The current draft does not allow for detailed labelling of final product where the batch is blended in the factory to specific parameters. (ie "controlled blending" of Manuka honey with other floral types). This option will become more important in the near future, as new science enables identification other native honeys more clearly.

Therefore, there needs to be another category/classification/definition where a specific quantity (eg.drum) of tested "monofloral Manuka honey" can be blended with specific quantities of another type(s) of floral honey, and legally be labelled as such.

For example:

If a factory blends one drum (300kg) of monofloral Manuka Honey with three drums of Rewarewa honey (900kg) in a batch, then there needs to be the ability within the regulations to label the product as "Rewarewa Honey with Manuka Honey (25%)", or similar. This would be in line with current Standard for labelling "characterising ingredients and components of food".

Unfortunately, the current GREX draft requires such a honey product to be labelled as "Manuka Honey blend", or similar, but only if it meets definition in clause 5.2. If the percentage of "Monofloral Manuka honey" is clearly known during production (even a small percentage such as 5%), there needs to be an option to label the final product as such. With the current draft, a final product blend may fail the requirement of clause 5.2. This could occur even though the product specification is clearly known at the blending stage. Audited records could substantiate it.

Clause 5.3 (3)

Where an operator or exporter has a **registered trademark** containing the word "mānuka" and intends to include that trademark on the labels of honey that does not meet either of the definitions in clause 5.1 or 5.2, he or she must:

- a) ensure that the appearance of the trademark on the labels does not amount to a representation or an inference that the honey is mānuka honey; or
- b) include information in the labels which sufficiently clarifies that the honey is not mānuka honey.

Submission 2:

The clause(s) with regard to trademark containing the word 'Manuka' are currently subject to interpretation by the person reviewing the label.

Therefore, it would be advantageous for the regulations to be more definitive (or even have examples), such as:

1. Font size for name of honey or
2. Relative Font size of honey name to trademark name
3. Separation between honey name and trademark logo by distance, or picture, or
4. Other

Thank you for the opportunity to make a submission.

Yours Sincerely,

s 9(2)(a)

From: s 9(2)(a) .com>
Sent: Tuesday, 6 June 2017 12:40 p.m.
To: Manuka Honey
Subject: Submission for GREX
Attachments: GREX Submission - 6 June 2017.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir / Madam,

I have attached a formal submission relating to the area of concern, labelling. I have also included details on our company:
However, I have also commented below on various aspects relating to the questions you asked in your document.

Q1-Q6 General questions: getting to know you:
Included in formal submission attached.

Q7-Q9: Impact of compliance costs for beekeepers, processors and exporters:
There will be additional cost to ensure Manuka authenticity, traceability and quality are well documented and controlled. However, this will not disadvantage the industry. The biggest issue in my opinion are the unnecessary costs. Therefore, only essential items should be included in the requirements. "Nice to have" items only add unnecessary costs.
I also believe ALL hives should be registered. This could be made very easy (eg internet form) and should be at no cost. I also believe every hive should have a specific number attached to it. The current regulations do not include hives that are for domestic purposes, but this is not good for the long term benefit to the industry or to NZ reputation. Domestic honey has been known to end up in the export arena, so registration and traceability of this should be included.

Q10, Q11: No additional substances to be present in New Zealand honey:
There should be no additional substances where it is detrimental to the product or reputation of NZ. However, I believe there should be a separate category for honey with additions by the factory. It could be called "modified Honey". For example, adding lemon flavour or other flavours would add a new product range and therefore add value to the industry. There would need to be specific regulation around such a sub-category including maximum quantities of additions, etc.

Q12: Processors of bee products to operate under a risk based measure:
As an exporter to China, traceability and quality are paramount. Therefore I totally agree that all processors (including extractors) operate under an RMP with full document control. It should be no different than in the other industries controlled by an RMP.

Q13: Bee products to be sourced from listed beekeepers:
ALL hives and owners should be registered. Registering all beekeepers should also be an option. That way ALL NZ honey can be traced and be made available for export. This should be done on-line and free of charge. Costs can be collected via another method (eg when honey is extracted, or when drums are sold). Domestic and export honey should not be separated at this point in the supply chain.

Q14, Q15: Pre-processing traceability requirements:
If NZ is to add value, then records of all hives and honey movements need to be recorded. This needs to be made cheap and easy for the very small and hobby beekeepers, or they will not follow

it. Additional costs will put small bee keepers out of business, or encourage not registering, which defeats the purpose.

Q16, Q17: Traceability from beekeepers to operators – harvest declarations:

I think this is essential for the future, but the costs need to be kept low if it is to work.

Q18: Traceability between operators – transfer documentation in AP E-Cert and reconciliation:

There should be one system for all exports, similar to Dairy, Meat, or Seafood industries. However, costs need to be kept down.

Q19 - Q25: Labelling of monofloral and multifloral mānuka honey:

(See my attached submission).

There should be a clear Manuka Monofloral definition to protect NZ Honey industry.

Compliance with a Manuka honey definition should be simple. It is a matter of testing and having faith in the tests results.

MPI's proposal may impact on the rights of some Trademarks containing the word Manuka, including our own trademark. There needs to be a clear distinction between the trademark and the honey name, and not one that is subject to interpretation.

The grading systems effectively relates to the level of MGO in Manuka. This is open to fraud by various methods. MPI does not address this issue. I think it should be addressed, as this is the only reason why Manuka honey is so valuable. It also flows on and increases the value of all other NZ honey. The proposed definition of Manuka honey is totally separate to the grading system because the chemical markers proposed are different.

My view of the science report is that it is inadequate. The proposed markers are expensive to test for, are not exclusive to Manuka honey, and can have 'false positive' results which fail genuine Manuka Honey. New Science is available and should be considered, since some is superior.

I think the definition for Multifloral Manuka is inadequate and doesn't protect the value of New Zealand Manuka honey.

Q26, Q27: Laboratory Tests:

Sampling by batch is the only way to test in a cost effective manner.

The testing method proposed by MPI is very expensive relative to the test methods proposed by the UMFHA latest science. This should be considered.

Q28, Q29: Transitional provisions:

GREX needs to come into effect as soon as it is ready and accepted by the majority of the industry. If any of the sections are not workable, create a financial burden on the industry, or create political turmoil, then it is better to wait and ensure GREX is correct.

There is currently a lot of Manuka honey in stock which has been tested for MGO. If the new testing regime fails some of the higher value product, then there is a problem. If it fails some of the lower MGO product, then the financial impact is minimum.

Q30: Any other feedback:

I don't think GREX is looking into the future: There is currently a large amount of science currently underway, as well as more sophisticated test methods being developed. The regulations need to reflect this or keep up. Because Manuka Honey has increased in value, science and testing of other New Zealand native floral honeys is well underway, which will also increase the value of these honeys in future. This should be considered now.

GREX does also not allow for future uses of Manuka honey (eg dried powder) in other products. This should be considered now.

GREX does not define "Natural MGO" from "Adulterated MGO". MGO is the reason Manuka Honey is so valuable. (and now other NZ honey) This needs to be protected and should be addressed now.

Regards,

Released Under the Official Information Act 1982



Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

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

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

Consultation closes on **23 May 2017**.

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.

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Your details

Your name and title:	s 9(2)(a)
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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
- ☒ 10 + years
- ☐ not applicable

3. Do you operate under:

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

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

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

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

Waikato, King Country and Central North Island

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

☐ 0

☐ 1 – 5

☐ 6 – 19

☒ 20 or more

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

☒ beekeepers 12

☒ processors 4

☒ packers 6

☐ 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?

We do this right now on an informal basis. We have tried and failed to barcode and track all our supers. We do track our supers from the hive to the extraction shed. There is no need to track the supers, track the honey that comes from the super. Most of the year, supers are empty. The cost to do this tracking will be huge.

The impact of the GREX on our bottom line will be huge. The delay so far since January has some businesses with no Winter overdraft facilities with banks, investments are been withdrawn. A sale of a honey business has been delayed due to GREX.

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.

To indelibly mark each honey super we have here, we think this will cost about \$21.50/bee hive Year 1 to tag each beehive, get staff to monitor and manage this process (2 extra staff for our operation) and have software to maintain. To continue to manage this system about \$10/bee hive per annum after the initial setup.

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)?

See question 8

There will be more administration time and training of staff to work through all aspects. We have a great team who are stretched right now.

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:

We work very hard to have healthy beehives so we don't feed sugar or anything else when they are collecting honey. Its challenging when the season is fickle.

☐ I disagree because:

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

Good bee feed trees at the bee sites.... Councils or Govt need to focus good plantings on road sides, DOC land, river and waterways to be bee friendly.

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:

We don't take brood frames for honey now. We have excluders above the brood boxes so the queen does not lay brood in the honey supers. Again with strong well managed hives you can manage this. All easy to say when the weather is good with strong flowering sources.

☐ I disagree because:

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

Good management of treatments when not collecting honey, with close monitoring of Varroa numbers, checking regularly. Requeening is also important. Assistance with queen stocks in NZ being of the highest quality is important as well.

Processors of bee products to operate under a risk based measure

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

☒ I agree because:

We run a RMP programme now, this would make everyone adhere to the same rules.

☐ 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:

This will ensure all beekeepers are accountable. I would see no need for staff of a larger operation to be on this list.

☐ I disagree because:

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

Pre-processing traceability requirements

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

☒ I agree because:

As long as the records are important to the process and not for record keeping sake

☐ I disagree because:

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

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

There will be an impact on the bottom line, however our operation is working at the highest level of traceability now. There is discussion that we may need to employ one more staff FTE to keep up with the administration in our team.

Traceability from beekeepers to operators – harvest declarations

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

☒ I agree because:

It's a good thing to have in place, again will make the same rules apply for everyone.

☐ I disagree because:

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

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

☒ I agree because:

We are doing it now, and do not see a huge adjustment for us. The challenge is who is going to check???? The verifiers are overloaded now, sometimes we cant get ED's approved or signed off as there is no one in the office to do this.

☐ I disagree because:

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

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

☒ I agree because:

This is the system now. Who will train people who don't know what they are doing?

☐ I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

☒ I agree because:

Manuka honey will be true to label. However so far we don't understand the test results. We have had some unusual results that we can't fathom. Our high UMF honey have failed the DNA testing so we have some very expensive ??? Honey???

☐ I disagree because:

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

WE need a clear guideline on what we can say on our label. Do we have to include the words monofloral and multifloral? If we do there will be a considerable cost to us for relabelling, new plates for new labels etc.

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

☐ I agree because:

☐ I disagree because:

☒ I have concerns because:

We have no base line to understand how we will blend our honey going forward with the new GREX, the results are difficult to understand. Who will monitor compliance? Very little is done now. Companies are still selling honey with the word Active on them, that was supposed to be stopped 18 months ago. No one is stopping that....

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

☐ I agree because:

☒ I disagree because:

I have huge concerns, MPI does not seem to be familiar with marketing Manuka honey. MPI could impact on consumers understanding of trademarks such as UMF and jeopardise sales. Our business would s 9(2)(b)(ii) with year...

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:

Similar to Q21, MPI are not familiar with how we manage this. The new GREX does not address this in the testing system.

☐ I disagree because:

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

Double the cost of testing, as our customers require an UMF test and now we have to do MPI testing to get the honey exported as well. Possible confusion in the marketplace as there is now another definition to understand. We can't explain this to our customers, as we don't know what it means.

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

No

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

Please share the process with us who are at the coal face selling honey. It seems that MPI want this up and going without working alongside those of us who are doing it.

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:

It's what we do now

☐ 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?

Double the cost of testing of honey.

Do you have any suggestions for minimising any impacts?

Developing a system for export that utilises what we are doing presently in terms of recognising the UMF standard as an example

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:

I am not sure that the stock and trade process will be achievable. We have not had time to check all our honey stock to see what we have under the new system, some of our higher honeys have failed the DNA and we don't know what we can do with it.

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:

As above, until we know what our honey is, we cannot commit to this.

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).

Please work with those of us who are harvesting the honey, testing it and exporting us. We just want a fair and reasonable system that will allow us to sell our honey overseas. Right now we are confused, we have test results that we don't understand, some honey that is not honey now and customers who want answers. We don't know what to tell them.

Being told that our UMF 16 and 20+ is now not Manuka because they failed the DNA test is not helpful. What is it??? We know it came from a location that had no other flower source at that time. Work with us to make our company and industry grow.

I am saddened that 25 years of honey research done in our industry seems to be completely ignored by MPI and now there is new stuff which doesn't seem to work. WE are the experts in beekeeping and exporting honey. Please don't ignore us.



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.

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Your details

Your name and title:	s 9(2)(a)
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Your contact details (such as phone number, address, and email):	s 9(2)(a) — <div></div> <div></div>

General questions: getting to know you

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

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

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

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

3. Do you operate under:

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

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

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

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

Bay of Plenty

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

- ☐ 0
☐ 1 – 5
☐ 6 – 19
☐ 20 or more

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

- ☐ beekeepers
☐ 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?

Currently we are not producing manuka honey and we are not packers or exporters, so not too much should change for us in compliance costs. Only "Part 4" can/will affect us; not sure how that will be, but likely more record keeping.

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.

As already stated, only "Part 4" will affect us.

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)?

We are self employed; I am the Operator and do not employ an administrative person; so any extra record keeping will take extra time. I can't imagine that it will take in our case more than 1 to 2 hours per week during the season.

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:

This is not really possible. Many beekeepers, including ourselves, have one broodbox, needs supering up in Springtime as the colony expands. The colony has to expand to full population before the honey flow starts. Only full populations are efficient in storing excess honey. During the building up to full population the colony needs adequate stores, so we feed them as they need it and stop feeding once honey starts coming in. It is such a waste to build up the populations during the honey flow, as the Beekeeper misses out on a lot of honey.

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

There should be very little additional sugars in honey. We cannot leave our hives starving. To be 100% sure no additional sugars are present in the honey is almost impossible, but certainly can be kept to a minimum. If honey supers went on only when the honey flow has started, still the bees can move what's in the bottom box(es) upwards.

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 totally agree with this one and not only for the reason of varroacide residues. We keep honey supers always separate, they are never used for brood. I encourage our clients (commercial beekeepers) to do the same. Our honey supers are of the $\frac{3}{4}$ model with the Manley frames and the broodbox is the Full Depth model.

To get a real clean, wholesome product (honey), it should be easy to separate wax etc. from the honey straight after extraction. Nothing is easier than there is only wax in the honey to deal with; separates very well from honey in a spinfloat, which is my preferred option for separation. Honey in frames which had brood in them before, produce much more "debris" which is harder to separate from the honey. Brood frames get darker in colour by every brood cycle and the darker they become the harder it gets to get really clean honey.

☐ I disagree because:

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

Processors of bee products to operate under a risk based measure

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

☒ I agree because:

I do not feel strongly about this, but would be better that we all abide by the same rules.

☐ 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 agree, again we all should abide by the same rules.

☐ I disagree because:

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

Pre-processing traceability requirements

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

☐ I agree because:

☒ I disagree because:

I do not see any reason as to why every honey super should be marked uniquely as the honey of one super is never processed and kept separate; it always happens in batches. Batches are normally harvested, at a particular time, from one or more sites with similar honey.

We keep our honey supers separate as they are different size to the brood nest box. When harvesting a site, empty supers go on (previously extracted), and the freshly harvested supers will be extracted within days, so they can go on hives again, which will be different sites. Reflecting to the last few seasons, we repeated this process approx 5 times. When harvesting, supers are stacked on pallets and pallets are numbered and labelled and records are kept (site, no of supers, date of harvest, pallet number).

I do not see any reason why we have to keep record of how many empty supers we put on hives; in my view in the end it is the traceability of the honey which is important, not the traceability of the empty supers; can't see the importance of that.

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

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

In case we have to trace every single super (uniquely marked), there will be considerable more recording and therefore time spent on it. It is hard to estimate the impact, but will mean the generation of extra paperwork. If we don't have to record down to every super, but by batches as explained above, not too much will change.

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:

Simple reason, all abiding by same rules.

☐ I disagree because:

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

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

☒ I agree because:

No change really

☐ I disagree because:

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

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

☒ I agree because:

Agree with same traceability requirements for all bee products intended for export. Not much will change for us.

☐ I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

☒ I agree because:

I do agree and really hope the manuka honey definition will prove itself to be the right one.

☐ I disagree because:

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

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

☐ I agree because:

☐ I disagree because:

☒ I have concerns because:

I am not involved in this part of our industry, so rather not answer this one.

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

☐ I agree because:

☐ I disagree because:

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

☒ I agree because:

I agree. The definition is only one to determine if the honey is sourced from manuka flowers by the bees, not what it contains re MG or DHA.

☐ I disagree because:

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

Hard to say, I am not involved in the blending and marketing.

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

Not really, hopefully time will prove the manuka honey definition is the right one.

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

I am grateful that we have finally a manuka honey definition. Of course I am hopeful that this is the right one and I thank MPI for taking the initiative to develop it.

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, I agree. It will hopefully restore credibility in our industry; at least that is what I like to see.

☐ 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?

It will have a minor impact on our business. We hardly produce manuka honey ourselves. We extract for commercial beekeepers and have the required systems in place.

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:

As I am not involved in marketing and exporting, I really can't answer this.

☐ 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:

Not involved in this, can't answer that.

☐ I disagree because:

Any other feedback

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





Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

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

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

Consultation closes on **23 May 2017**.

How to have your say

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

Please include the following information in your submission:

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

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

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

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

The following points may be of assistance in preparing comments:

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

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Your details

Your name and title:	s 9(2)(a)
Your organisation's name (if you are submitting on behalf of an organisation), and whether your submission represents the whole organisation or a section of it:	s 9(2)(a)
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General questions: getting to know you

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

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

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

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

3. Do you operate under:

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

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

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

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

Waikato

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

☐ 0

☐ 1 – 5

☐ 6 – 19

☒ 20 or more

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

☒ beekeepers

☒ processors

☒ packers

☐ other – please specify

Impact of compliance costs for beekeepers, processors and exporters

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

Financial impact and time look to be the biggest impact. Expected loss in sales of bulk material due to uncertainty MPI has caused by not presenting a reliable Manuka Standard that protects the industry and the associated value of it. Stock in trade periods need to be extended for the industry to make an easier adjustment to the proposed requirements an alleviate financial impact.

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.

We will be affected by all of Page 11, financially this is a huge cost for testing and adding time around ensuring our product now adheres to the MPI standard as well as other market standards. Also the added cost of record keeping by extractor affects us as well. The cost of record keeping all the way down to the level of honey supers would be a huge capital expense, seems a step too far as beekeepers move frames from super to super what's the point of tracing a super. If you wanted full traceability I propose tracing individual bees with little GPS trackers or ear mark them with RF IDs.

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

No additional substances to be present in New Zealand honey

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

☒ I agree because:

I agree as this is already an unwritten industry norm. How will this be policed? If added testing is required, then I strongly disagree as testing wont determine that there was feeding occurring or that the bees were moving sugar syrup from brood chamber to honey super.

☐ I disagree because:

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

Only way to police this would be to have a limit set on results when being released for export that would bring up a red flag of in consistent presences of chemicals. This would take a lot more research and data than MPI has previously acquired.

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:

How will you police this? Limited resources by verifiers twice the workload, seems more like an impossibility, bar testing extracted honey which is already being done by the verifier.

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

Processors of bee products to operate under a risk based measure

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

☒ I agree because:

I believe it brings the industry onto a more level playing field especially for verification purposes.

☐ 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:

As long as the requirements improve the industry and doesn't make more record keeping for no added benefit.

☐ I disagree because:

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

Pre-processing traceability requirements

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

☐ I agree because:

☒ I disagree because:

A lot of recording keeping that will never be checked nor policed due to limited resources of verifier. MPI should if anything come into the 21st Century and spend some money on improving the ApiWeb system as it needs urgent upgrade.

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

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

Initial impact in the tens of thousands and increasing due to expansion of business. This new proposal seems to add twice the workload for the industry including verifiers to prove the traceability that already exists. Verifiers struggle to audit RMPs 6 monthly as it is, now MPI expects them to spend all the time checking whether a super was at the site it said it was or not. Seems like an unattainable task with little thought for practicality.

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:

extra responsibility needs to be upheld by the beekeeper as to their honey being extracted. But the recording keeping needs to be the responsibility of the beekeeper not the extractor.

☐ I disagree because:

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

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

☐ I agree because:

☐ I disagree because:

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

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

☒ I agree because:

Should have always been enforced. More workload for verifiers though.

☐ I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

☐ I agree because:

☒ I disagree because:

I agree that there needs to be a standard that works but so far MPIs present standard does nothing but remove 20% of the highest valued/purest Manuka off the market. If MPIs motivation was to do this, then they are successful. Because so far their desire to sustain and protect a \$300 million export market seems to have back fired and the effect of this will surely impact everyone and least of all MPI.

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

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

☐ I agree because:

☐ I disagree because:

☒ I have concerns because:

My concern is that if they don't comply what is the cost/fine to them. Non-compliance seems to be the last thing on peoples' mind as MPI does nothing to deter non-compliance.

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

☐ I agree because:

☐ I disagree because:

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

☒ I agree because:

The industry has a grading system already based on 20 years of research. No new research is going to change that for the better.

☐ I disagree because:

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

If the definition is amended to show that the 15+ and higher UMF that is failing the DNA pollen analysis is manuka, then I feel that the definition will impact only the bottom end of the grading system which is and has always been a Multi-floral manuka.

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:

This is already a process in place in our business.

☐ I disagree because:

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

Cost of testing on packed product to increase 25%, and raw material to increase by 50%. Volume of samples being tested likely to increase slightly but with the DNA pollen analysis seemingly changing over age it appears more testing must be done to keep an up to date result of raw material.

Do you have any suggestions for minimising any impacts?

Subsidise testing costs for 1 to 2 years, or extend implementation date for an extended trade out period on exports markets that don't need official assurance.

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:

The proposed workload to reach the level of compliance will take longer than 6 weeks.
Needs to be a minimum of 12 months.

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:

If manuka generally sits for a year before being processed the minimum time frame should be 12 months of stock in trade.

Any other feedback

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

The proposed plan for a definitive "Manuka" test will be well received and warranted considering the loss for the industry without it. MPI need to have a concrete method and standard to present, as if not having a standard and control in place jeopardizes our current international markets then equally are they jeopardized if our own Government cannot come up with a test that works. Introducing a test that doesn't not work will make it worse than the status quo.



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Released Under the Official Information Act 1982

General questions: getting to know you

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

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

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

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

3. Do you operate under:

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

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

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

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

South Auckland, Waikato, Bay of Plenty, Taranaki, Taumaruni

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

☐ 0

☐ 1 – 5

☒ 6 – 19

☐ 20 or more

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

☒ beekeepers x 7

☒ processors x 2

☒ packers x 2

☒ other – please specify office and export documents.

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?

The new proposals will entail employing 2 – 3 extra staff for the placement of tags and record keeping

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.

A, B C D will all affect our business i.e. time spent marking all honey supers and traceability re honey boxes to and from hive sites.

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

No additional substances to be present in New Zealand honey

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

☒ I agree because:

I agree because we want to minimize sugar getting into the honey.

☐ I disagree because:

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

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

☐ I agree because:

☒ I disagree because:

At different times of the season and management of the hive brood combs can be in the honey boxes. Sometimes queenless hives are used as honey boxes.

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

Api – life treatments could be used. Apistan if well filtered would be removed with the wax as honey is filtered.

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:

All produce is then under one control and can be used for local and export sales.

☐ 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:

With the current HD and ED we have good traceability

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

I do not believe we have a gap in the traceability chain

Pre-processing traceability requirements

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

☐ I agree because:

☒ I disagree because:

The existing HD and ED backed up with lab reports covers all movement of honey.

I do not agree with keeping additional records because of:

1. Costs
2. Records are now being kept giving hive numbers, sites and number of supers of honey taken from each site. This then starts of the traceability of the honey.

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

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

The costs will not be known until all identification has been done and a full season of tracking completed – they will incur extra time spent on record keeping which will add to increased labour costs.

Traceability from beekeepers to operators – harvest declarations

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

☐ I agree because:

☒ I disagree because:

This is covered in 14.

1. We already have harvest statements which give good traceability – I do not agree with keeping additional records.
2. Records currently held cover the hive sites and honey traceability back to that site.

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

No. Where is the gap in the traceability?

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 associated with these proposals will vary depending on what proposals are pushed forward.

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 already have transfer documentation and ED in place between processors and exporters.

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

Labelling of monofloral and multifloral mānuka honey

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

☐ I agree because:

☒ I disagree because:

The proposed testing by MPI is not robust to test Manuka Honey. MPI has not come up with a fool proof testing program

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

Drop DHA test and use the 3 in 1 test.

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

☐ I agree because:

☐ I disagree because:

I cannot comment on this because of the results of MPI testing

☐ I have concerns because:

As above in 19

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:

No comment

☐ I disagree because:

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

☐ I agree because:

☒ I disagree because:

I Strongly disagree with MPI statement "Does not propose to make changes to the current use of grading systems"

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

1. There will be a lot of honey sold as Manuka with very little Manuka present.
2. The new proposals were to strengthen the Manuka quality not reduce it.
3. If you want to bankrupt an industry MPI has selected the proposed testing regime to do it.

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

I think the comments in 23 cover it – MPI has to listen to the comments and submissions coming through

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

Drop the DNA and stay with 3 in 1 test which gives true results and has proven itself over the past years.

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 on most of this. What are the training techniques? We currently drum test and batch test before packing.

☐ 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?

There will be some added costs – may be \$150 per sample for testing and paper work

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:

It is too short a time frame – 3 to 6 months between Grex notified

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?

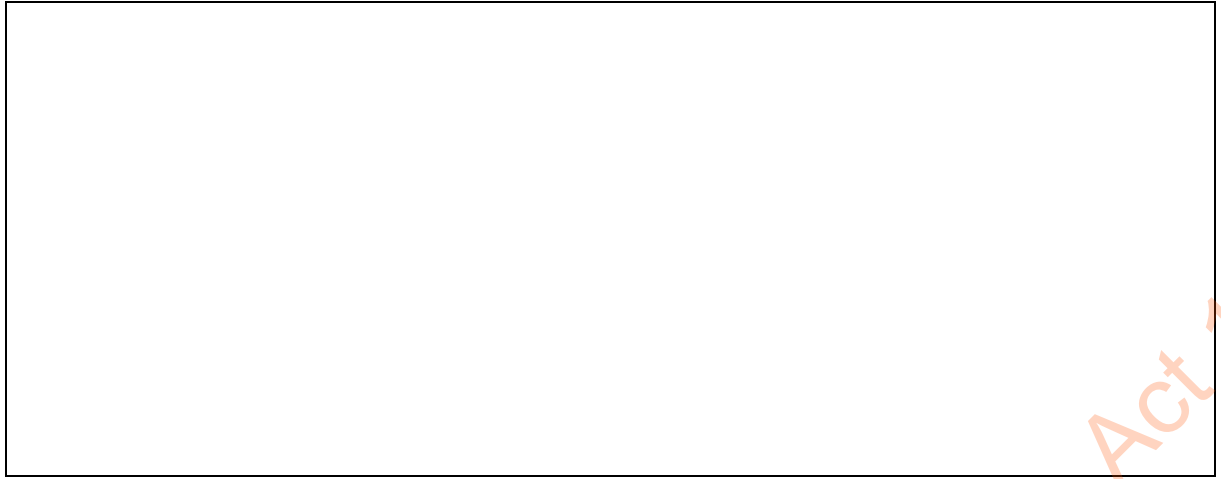
☐ I agree because:

☒ I disagree because:

Again this is a very short time frame.

Any other feedback

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- ☒ packer
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- ☐ retailer of bee products
- ☐ other – please specify

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

- ☐ 0-5 years
- ☒ 5-10 years
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3. Do you operate under:

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- ☐ none of these
- ☐ not applicable

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

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

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

Nelson & Tasman

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 – presently no staff, Husband and wife operation

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?

increased cost of testing, discussion document says that cost is negotiable with verifier supplier, however in reality there is no negotiation and with only essentially 2 verifiers MPI and Asure Quality no real choice either. We have already had increased audit costs and now with proposed increased paperwork to audit, hourly rates and fees will surely increase as well. Likewise the increased testing required is another cost that now has to be factored in and as a small producer with a limited capacity to combine drums into a batching tank, these costs will significantly add to the bottom line. There is again little opportunity to negotiate costs with only 2 certified laboratories, able to do testing. Overall the increased costs will be thousands of dollars / season.

The administrative costs to maintain the trackability requirements from a beekeeper point of view is hard to determine, but could easily be in the order of 1/3 to 1/2 a full time equivalent for our operation.

I am however concerned at the implications for the extractor operator, having to police and manage the proposed requirements and the cost involved in maintaining these records.

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.

Clause 3.2 – already have RMP, but envisage audit fees will again increase to police new regs
Clause 3.3 – no increased cost, already have RMP
Clause 4-7 – huge impact, approx 1/2 full time equivalent employee to manage increase admin. as a small operation we do not have transferable systems, and to introduce would place undue financial burden. Electronic systems do not work at the hive, either because of no internet coverage etc out in the bush or the fact that electronic systems are unworkable when in hive gear or covered with honey, wax and propolis. Paper systems will become onerous and lose accuracy and will end up not reflecting the intent of what you want managed.
Clause 5 – No direct costs at this stage, however, should note that because of delays and uncertainty related to this exercise, very few of the national honey buyers have purchased any

honey this year, and as a result, the \$/kilo rates being offered are already low compared to normal. Estimated that honey sold this year, we have taken a hit of between \$0.50 - \$2.00 / kilo x 4 tonne, As we have sold our honey at a lower rate to get rid of it, before these new regs are in place.

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

I envisage that to maintain the new regs would take our operation another ½ full time employee, that employee will have to be trained and brought up to speed but as most courses run are only in the main centres there will also be travel costs in addition to course costs and wages. They is also the time involved in chasing up beekeepers to ensure that there harvest decs are complete and accurate.

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:

we don't feed sugar to hives that have honey boxes on and if we need to we take the honey box off,

☒ I disagree because:

However, this practice will grossly affect queen breeders and nuc sellers, who we extract for, and I am concerned that the extractor operator is going to have to be the police and how that will affect our business in both potential for lost work and or time/cost in managing compliance.

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

Put the onus of sugar onto the beekeeper in form of Harvest declaration statement. Extractor already has to state that they do not add any synthetic chemicals in the ED/ECert declaration.

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:

This is unrealistic to manage, as part of normal beekeeping practice, frames get swapped around from box to box. Frames get scraped re-waxed or foundation laid. Boxes get split, nucs get sold. It is unrealistic if you have 1000 hives, each with 2 brood boxes and 2 honey boxes totalling 40000 frames to know where and what each has done. By the time an issue has been raised the bees and frames are long changed. Bees only live 6 weeks. It is too hard for an extractor operator to determine if a frame has ever been used for brood unless it actually has live brood in it, in which case it is already a condition of RMP/code of practice that these frames are not extracted. Again the onus should be on the beekeeper by way of Harvest declaration

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

Again the onus should be on the beekeeper by way of Harvest declaration not the extractor to police. Harvest Decs already have provision for a statement around Varroacides, by beekeeper, increase beekeeper training in onsite requirements, subsidised the cost of authorised varroacides if beekeeper has undergone suitable training is correct use etc Beekeepers need additional training in how to fill out the existing form and will surely need training if a new form is introduced and what their requirements are. Presently it is up to the extractor to train and ensure beekeepers are compliant, when we don't have anything to do with their own systems and products used.

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:

needs to be one rule for all, and costs shared across entire industry not just a few who have to operate under higher scrutiny and associated costs.

☐ 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:

Because we need to simplify the listing/registration process as it is now too onerous for the extractor operator to maintain separation procedures for honey extracted for listed beekeepers for export, non-listed beekeepers for export, and beekeepers who only want to sell domestically.

☒ I disagree because:

already have data collected in Beekeeper registration database, AFPMP and signed statements on Harvest Declarations
Ditch the Beekeeper Registration process and replace with Beekeeper Listing for everyone.

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

the existing beekeeper registration, the new beekeeping listing registration and the filling out of Harvest Decs and Annual Disease Return, needs to be linked and all data combined and cross-referenced. Currently too many different levies that all have similar functions and data collecting abilities and consequently too many costs associated. Need to have one comprehensive database and registration function which will address all requirements. change the Harvest Declaration wording to encompass statement of when varroacides have been used.
It has now become onerous for the extractor operator to manage the different beekeeper categories and hence honey eligibility

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:

strongly disagree., unworkable and not required
draft gres states *Traceability also facilitates an effective recall of that product if it is unsafe (for example in the event of a tutin poisoning. ECERts etc already have facility for tutin statements and bring back facility to attach reports to ECERts.*
draft gres states *or is otherwise not fit for purpose (for example, if it has been adulterated).*
Ecerts already have declaration from processor that substances have not been added

Marking of boxes to identify back to apiary site is irrelevant as frames get swapped both at hive and at extraction plant from box to box and from site to site. Systems to try to manage such a task would be completely impractical to implement. Paper systems would be too inaccurate, get lost, get wet, covered in honey wax etc and become unworkable. Electronic systems would be too expensive to purchase, don't work without internet connectivity in remote bush settings, scanners barcodes readers barcode labels etc on boxes or other smart devices don't work when covered with even the smallest smear of honey, wax, dirt or propolis or when you are wearing gloves, beesuit and head veil. Indelible markers get removed when boxes get redipped and painted over.

Boxes are merely the holders of frames and the frames are merely the vessel for honey. It is the honey that needs to be tested and ensured to be safe, not the box and frame it is held in. Harvest Decs already records the apiary site honey has come from and if there was a tutin problem, then honey from new boxes and frames on those hives would be collected and tested. It is irrelevant to record the woodware as it moves too often. If the issue is related to AFB spores in the honey then the hive sites from which the honey has been harvested from can already be tracked back via the Harvest Dec.

If necessary change the requirement of the AFPMP to require site to be registered if honey harvest has commenced rather than after 30days, reduce to registration cost to reflect that some seasonal sites are only in the system for a few weeks.

o the dates and volumes of honey harvested from supers; o when, and how many honey supers are put on or taken off the site; and o the honey supers (by individual identifier) at each site at any time.

Dates and estimated volumes I.E. 1 box or 30 Boxes are already recorded as being taken off an apiary site via the existing Harvest Declaration, there is no need to further record this in a separate document.

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

Make tutin testing mandatory before any sale domestic or export. Attach results to sale receipt documentation
spot test honey samples for adulterated substances, if fail lose RMP status

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

we operate a beehive rental business, so we have single hive apiary sites, therefore 200 hives on 200 registered sites. Our fees are already 200 times higher than the beekeeper who has 200 hives on 1 apiary site as we pay for 200 base fees of \$14 or so dollars/site. To impose further per hive and per apiary type costs in way of administrating individual box numbering system and record keeping is just going beyond what is actually possible in real world beekeeping.
Respectfully ask that you actually put a beesuit on and glove up, open a hive and complete a hive check and then try to do your record keeping exercise sitting in the car on the way to the next apiary site, while driving down a bumpy gravel road and see if you what you are proposing is actually possible. Because all that will happen is beekeepers will come back and fudge the system.

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:

we already have, so expand it to cover some of the gaps but make it relevant and workable, there is no use signing a declaration if it is not achievable as all that will happen is that there will be a bunch of beekeepers getting prosecuted for not complying and a bunch of extractors with drums of honey that can't be sold.

☐ I disagree because:

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

make all the databases link, share the data and make beekeepers accountable by not being able to voluntarily withdrawn from system ie AFPMP give extra training to beekeepers so they know their requirements, use the massive amount of levies they pay to train them and help them comply.

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

☐ I agree because:

☒ I disagree because:

It will have huge impact both as beekeeper and contract extractor to beekeepers of all sizes

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:

centralized system for export or all sale, put it all in one place and simplify

☐ I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

☒ I agree because:

if you can get the science correct re the DNA etc

☐ I disagree because:

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

It is important that consumers know that honey is NZ Manuka and Australia should not be allowed to use the word Manuka as a NZ Maori word to describe their Leptospermum species of tree. Consumers still want to know the NPA/UMF values and this should be allowed to be incorporated into definition.

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

☐ I agree because:

☐ I disagree because:

☒ I have concerns because:

as is a complicated regulation to follow, suitable one on one training with the verifiers onsite needs to happen otherwise, we are all being set up to fail

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

☐ I agree because:

☒ I disagree because:

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

☐ I agree because:

☒ I disagree because:

I think it all needs to be incorporated together otherwise there is still confusion in the marketplace as to whats what

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

2 systems still confusing for consumers

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

sounded good and robust, but results are not stacking up. More work needs to be done around storage temperatures storage times and their affect on results and what is and isn't allowed for OMars

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:

but it is very expensive and takes too long to complete at 6 weeks.

☐ 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?

high, as we are small and with limited capacity to blend several drums together to reduce the amount of testing required. Will result in several extra thousand of dollars / season to complete. And likely that honey will fall into multifloral category and so will be valued at a lower rate/kilo. Would have been nice to have several levels of category similar to a % pollen analysis

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:

way to short a time frame, to get everything reorganised and in place for pending sales

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:

should be long enough

☐ 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).

just simplify and align all processes and make it uniform across the whole industry regardless of whether it is for omar country or not

Released Under the Official Information Act 1982



Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

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

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

Consultation closes on **23 May 2017**.

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.

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

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

General questions: getting to know you

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

- ☐ beekeeper
- ☐ extractor
- ☐ processor
- ☐ packer
- ☐ exporter
- ☐ retailer of bee products
- ☒ other – please specify - all areas of the supply chain are operated by members

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

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

3. Do you operate under:

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

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

- ☐ 0 – 5
- ☐ 6 – 50
- ☐ 51 – 500
- ☐ 501 – 1000 the branch consists of beekeepers that are hobbyist through to commercial
- ☐ 1001 to 3000
- ☐ More than 3000

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

Southern North Island

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

- ☐ 0
☐ 1 – 5
☐ 6 – 19
☐ 20 or more

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

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

Impact of compliance costs for beekeepers, processors and exporters

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

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

--

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

No additional substances to be present in New Zealand honey

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

☐ I agree because:

☐ I disagree because:

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

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

☐ I agree because:

☒ I disagree because:

Part 3.1(1)B Honey is not harvested from honeycomb previously part of a brood nest:

This should be removed from GREX –

Not removing honey from the brood nest is general best practice for beekeeping. We accept that honey should not be extracted from live brood .

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

Processors of bee products to operate under a risk based measure

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

☐ I agree because:

☐ I disagree because:

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

Bee products to be sourced from listed beekeepers

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

☐ I agree because:

☐ I disagree because:

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

Pre-processing traceability requirements

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

☐ I agree because:

☒ I disagree because:

Part 4 Requirements relating to traceability.

There are too many different systems in use at present. The industry needs to standardise to one system, the software supplied by MPI. This should be user friendly and accessible for MPI, beekeepers and police.

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

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

Traceability from beekeepers to operators – harvest declarations

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

☐ I agree because:

☐ I disagree because:

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

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

☐ I agree because:

☐ I disagree because:

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

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

☐ I agree because:

☐ I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

☐ I agree because:

☐ I disagree because:

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

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

☐ I agree because:

☐ I disagree because:

☐ I have concerns because:

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

☐ I agree because:

☐ I disagree because:

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

☐ I agree because:

☐ I disagree because:

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

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

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

Part 5: Labelling of Monofloral and multifloral manuka honey 5.1 and 5.2

Peer review. It should not be considered peer reviewed until it has been published. Legislation should not be passed until this process has been finalised.

DNA marker test – there are concerns that some tests of high grade manuka are failing this part of the test. That manuka pollen may not be present in. Bees do not collect manuka pollen. Also is the DNA degrading after time which would account for the failed tests of aged 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:

DNA marker test – there are concerns that some tests of high grade manuka are failing this part of the test. That manuka pollen may not be present in. Bees do not collect manuka pollen. Also is the DNA degrading after time which would account for the failed tests of aged honey? These concerns need to be addressed before GREX comes into effect.

The lead in time for GREX will be impossible to implement an electronic traceability system. This needs 2 – 3 years taking into account the cost for beekeepers and the time needed to implement it. MPI have not factored this in to the proposal.

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).



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

General questions: getting to know you

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

King Country, South Auckland

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 –All 3 beekeep, process and pack as we are a small business

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?

The new proposal will increase our costs by \$190 dollars per sample.

We already have to pay:

Tutin \$80

Manuka 3 in 1 - \$40

Leptosperin \$45 (To ensure consumers get a real manuka product)

C4 - \$140 (to comply with overseas markets)

Total = \$305 + \$190 = \$495 per sample

An overseas market/end consumer is not just interested in a definition of Manuka, they want a valid honest, scientifically backed grading system that they have faith in to pay the premium price for high end Manuka Honey

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

Beekeeper marking each super with identification

This is impractical as honey frames from a number of supers can be interchanged to full up one super with full frames of honey.

All honey from a specific apiary is mixed together at extraction to make 1 batch, so marking each super becomes redundant straight away at the extraction process.

The practical way forward is to identify per apiary which is already happening for most beekeepers.

Our honey supers are always stored in a manner that minimises contamination so we do not have a problem with that.

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 costs of implimenting such a system would be huge finicallay, with labour time and paper work.

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:

It has always been good practice that you stop all feeding weeks before putting your bees onto a honey flow.

☐ I disagree because:

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

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

☐ I agree because:

☐ I disagree because:

No that is not practical.

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

The practicality of varroacide being applied is at the end of the honey season in Autumn and then again in early Spring months before honey flow. However if a beekeeper was to use strips because mite problem during the honey season then that super should not be collected.

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:

That's good.

☐ 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:

That's fine but needs to be put out to a greater audience as smaller beekeepers are still not aware of this requirement.

☐ I disagree because:

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

Pre-processing traceability requirements

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

☐ I agree because:

☐ I disagree because:

By having to mark each super with a unique form of identification it will have a large effect.

Cost of system
Labour to implement
On going Labour to implement
Cost of Maintaining

There are so many variables with creating something like this and it needs to be looked at from the primary producer (beekeepers) practical point of view.

A Few examples;

What if you can't afford a barcoding system and had to hand write on each super and then you would have to re do this yearly as it would come off in the conditions of use

What if a hive dies as that happens over winter or if they get robbed out so that you would have mulitiply hives that have to be deleted etc

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

As we are audited twice a year they should not be any gaps in anyones tracability.

What are you trying to archieve?

MPI is looking for the traceibilty of the honey.

The source of the honey is from each apiriy, that is what you should be focusing on, not individial supers that could be transferd from storage sites or apiriy site, as it all depends on the honey flow.

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?

You can not implementm identifaction of each honey super, it has to be the extisting system of each apiriy.

This would be of huge cost to us and could potentially make our buisness not viable

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:

Its fine

☐ I disagree because:

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

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

☐ I agree because:

Costs of adding a few clauses to the harvest declarations will not be high. Traceability on the other hand will cost time and money.

☐ I disagree because:

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

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

☐ I agree because:

This is what we have to complete already when transferring to another RMP and we are audited on this.

☐ I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

☐ I agree because:

☐ I disagree because:

Reason being;

You should be dropping the pollen test and replacing it with Leptosperin

The reason being is two fold

1. Leptosperin from other pair review (Japan, Germany, UK and NZ) scientific research is a rebust and reliable test.
2. Manuka Pollen is very small and is not directly collected by the bees and as a result in the high grade Manuka honey, where the Manuka flower is one of the only sources, there is very little or no recording of pollen, this is general knowledge in the beekeeping indutry. Further to this if you have pollen count as a measure not only will the high grade Manuka not pass the test but this also setups for easy audltartion as high pollen count flowers such as clover or other field honeys can be mixed with Manuka.

Exapmles of what would happen;

900kg Kanuka and 200kg Multi Floral Manuka Honey would get you 1100kg of Manuka Honey

Key point Leptosperin occurs in high consentaton in Manuka Nector (not pollen)

Having resently received MPI s most recent email in which you repeat that this pollen testing method is sound and then follow on to list actions that would pretent high grade Manuka from failing i.e. Homogenous batches

This is standard p actice as we MPI request as we have to make sure that all batches are mix with out a doubt due to tutin!

Further more these failing tests are only in high grade Manuka, you havn't address why this is the case.

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

Yes look at replacing the pollen test with Leptosperin

Or at the very least release the reboost and scienifical based science that MPI has create as to why Leptosperin was rejected.

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

☐ I agree because:

☐ I disagree because:

☐ I have concerns because:

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

☐ I agree because:

☐ I disagree because:

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

☐ I agree because:

☐ I disagree because:

There should be one Grading system for the end consumer, what is what was asked for by the industry.

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

The new proposal will increase our costs by \$190 dollars per sample.

We already have to pay:

Tutin \$80

Manuka 3 in 1 - \$40

Leptosperin \$45 (To ensure consumers get pure product)

C4 - \$140 (to comply with overseas markets)

Total = \$305 + \$190 = \$495 per sample

An overseas market/end consumer is not just interested in a definition of Manuka, they want a valid honest, scientifically backed grading system that they have faith in to pay the premium price for high end Manuka Honey.

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:

3-Phenyllactic Acid – In Both Manuka and Kanuka – therefore it should not be used
4-Hydropheryllactic Acid – Present in Manuka and Kanuka (also in others but lower quantities) – again why should we have to pay for something that isn't conclusive
2-MBA and 2-MAP are good

Pollen Test- issues around high grade Manuka which is clearly Manuka not passing (20%) therefore how could this be used when it would really hurt the market.

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?

Massive impact as will have to be paying at least \$400 a sample with all the over tests required.

These new tests are more expensive than all the others and we will still have to get the others e.g. UMF or MGO as that is what the end consumer understands

Do you have any suggestions for minimising any impacts?

Make the pricing better and allow all labs to do the pollen testing.

Re-look at the Pollen Test, allow a greater amount of time to really make sure that you are correct.

Re-look at MPI science and get it peer reviewed by major markets e.g. UK or Japan

Release the science not just a summary as there are many scientists in the industry that could understand it completely – you have done this which is great!

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:

Not sure that 6 weeks would allow you to release the complete science and then listen to Industry and its members feedback.

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).