Ministry for Primary Industries
Manatū Ahu Matua

Animal Products Notice

General Export Requirements for Bee Products

3 August 2020

Issued under the Animal Products Act 1999

New Zealand Government

TITLE

Animal Products Notice: General Export Requirements for Bee Products

COMMENCEMENT

This Animal Products Notice comes into force on date of signing.

REVOCATION

This Animal Products Notice revokes and replaces Animal Products Notice: General Export Requirements for Bee Products (29 January 2018).

ISSUING AUTHORITY

This Animal Products Notice is issued pursuant to section 60 of the Animal Products Act 1999.

Dated at Wellington, 3 August 2020.

[signed]

Allan Kinsella
Director, Assurance
New Zealand Food Safety
Ministry for Primary Industries
(acting under delegated authority of the Director-General)

Contact for further information
Ministry for Primary Industries (MPI)
New Zealand Food Safety
Systems Audit, Assurance and Monitoring
PO Box 2526
Wellington 6140
Email: food.assurance@mpi.govt.nz

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Introduction

This introduction is not part of the Animal Products Notice, but is intended to indicate its general effect.

Purpose

The purpose of this Notice is to facilitate market access and safeguard assurances provided by New Zealand by setting out general requirements that must be met in order for honey and other bee products to be eligible for export. In particular, this Notice specifies the following:

a) requirements for ensuring that bee products meet market access requirements; and
b) requirements for ensuring traceability through the export supply chain; and
c) definition for monofloral and multifloral mānuka honey and associated requirements.

Background

The Ministry for Primary Industries (MPI) continuously reviews New Zealand's regulatory framework for the export of animal products, including bee products. This ensures that the framework meets market expectations and adequately addresses prevailing trade issues.

This Notice imposes requirements for:

a) ensuring traceability between all players in the export supply chain, including beekeepers, operators and exporters; and
b) bee products to be fit for intended purpose; and
c) beekeepers to be listed with MPI if they are not operating under a risk-based measure; and
d) secondary processors of bee products to operate under a risk-based measure.

This Notice also recognises the continuous application of the Australia New Zealand Food Standards Code and Food Standard: Tutin in Honey.

Who should read this Animal Products Notice?

This Notice should be read by persons identified in clause 1.1 of this Notice.

Why is this important?

This Animal Products Notice is important because any bee products that fail to comply with any requirements of this Notice may not be eligible for export, and may endanger human health.

Additionally, for the purposes of section 135(1)(c) of the Animal Products Act 1999, a failure to comply with this Notice, without reasonable excuse, is an offence.

Document History

Version Date	Section Changed	Change(s) Description
29 January 2018		
3 August 2020	1.2 3.3 and 4.1 4.2.5 4.3, 4.4 and 4.5	Guidance box added Guidance about commencement of the revoked Notice deleted. Pre-commencement harvest declarations deleted as no longer applicable. Updated requirement for parcels less than or equal to 2 kilograms, some rewording changes and addition guidance boxes added.

Version Date	Section Changed	Change(s) Description
	Part 8	Transitional provisions that are no longer applicable as 6 months since implementation of revoked Notice have elapsed have been deleted. The wording for testing prior to the 5 February 2018 (the implementation of the revoked Notice) has been updated. Further guidance has been added to give clarity to part 8.

Other information

Relationship between this Notice and other legislation

Animal Products Notices

For the avoidance of doubt, this Notice does not affect the application of the following Notices issued under the Act, and beekeepers, exporters, operators, recognised agencies, recognised persons, and recognised laboratories should be aware of their obligations and responsibilities under those Notices:

a) Animal Products Notice: Export Verification Requirements; and
b) Animal Products Notice: Honey and Honey Based Products – Food Standards Exemption; and
c) Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products; and
d) Animal Products Notice: Regulated Control Scheme – Monitoring of Specified Substances in Bee Products for Export; and
e) Animal Products Notice: Specifications for Laboratories and the Consolidated List of Tests for Animal Products: meat, poultry, honey, seafood, dairy, live animals and germplasm; and
f) Animal Products Notice: Specifications for Products Intended for Human Consumption; and
g) General Requirements for Export (GREX) Notification 08/035: Contaminant Requirements for Bee Products for Export; and
h) Any market-specific Overseas Market Access Requirement (OMAR) issued under section 60 of the Act.

Agricultural Compounds and Veterinary Medicines Act 1997

Beekeepers should ensure that any agricultural compounds they use on or in their hives are either registered for use under the Agricultural Compounds and Veterinary Medicines Act 1997, or exempt from registration under the Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011.

Biosecurity Act 1993

Beekeepers, exporters and operators should comply with applicable provisions of the Biosecurity (National American Foulbrood Pest Management Plan) Order 1998.

Food Notices

Beekeepers, exporters and operators have a responsibility to comply with applicable provisions of the:

a) Food Notice: Requirements for Food Control Plans and National Programmes (where applicable); and
b) Food Notice: Maximum Residue Levels for Agricultural Compounds.

Part 1: Preliminary provisions

1.1 Application

(1) This Notice applies to:

a) all bee products intended for export; and
b) all beekeepers supplying bee products for export; and
c) all operators of premises carrying out secondary processing of bee products for export; and
d) all exporters of bee products; and
e) all operators of recognised laboratories that carry out laboratory tests for the purposes of Parts 5 and 6 of this Notice.

(2) To avoid doubt:

a) this Notice covers all bee product exports regardless of whether the importing countries require official assurances or not; and
b) export includes selling bee products to overseas buyers using the internet platform; and
c) the term "mānuka" (i.e. with the macron), "manuka" (i.e. without the macron) and "maanuka" are the same term with the same meaning for the purposes of this Notice.

(3) This Notice does not apply to bee products carried overseas by a traveller for the purpose of personal consumption.

Guidance

- The carrying offshore of bee products in a quantity that is more than which would be reasonably required for the purpose of personal consumption would, unless the contrary is proved, be treated as an exportation for the purposes of this Notice.
- Secondary processing includes any of the following process beyond primary processing: extraction, manufacture, packing, preserving, and storage.

1.2 Definitions

(1) In this Notice, unless the context otherwise requires:

Act means the Animal Products Act 1999;

American Foulbrood (**AFB)** means disease caused by the organism *Paenibacillus larvae also known as Bacillus larvae;*

AFBPMP means the American Foulbrood Pest Management Plan as established under the Biosecurity (National American Foulbrood Pest Management Plan) Order 1998;

AP E-cert means the Animal Products Electronic Certification System specified for the raising and issuing of eligibility declarations, eligibility documents and export certificates in respect of all animal material and animal products requiring official assurances;

authorised person means a person designated by the Director-General under section 65 of the Act as able to issue, withdraw or reissue official assurances;

authorised user means a person who has been both approved by MPI to access AP E-cert to raise a type of transfer document and/or to apply for export certificates, and is designated by an operator or an exporter to access AP E-cert on their behalf;

batch means a definite quantity of bee products processed or produced under conditions which are presumed uniform;

beekeeper for the purposes of this Notice, means a person (natural person or corporate sole) who keeps honey bees for the purposes of producing bee products for export and who is required to notify apiaries under the AFBPMP;

beekeeper listing ID means the unique listing identification assigned to a beekeeper under clause 3.3.3(1) of this Notice;

bee products means honey, honeydew honey, bee venom, bee pollen, bees wax, propolis, royal jelly, and any other product collected by, or derived from, honey bees intended for human or animal consumption;

consignment means a quantity of bee products delivered at one time, which may consist of a batch, a portion of a batch, several batches, or portion of batches;

eligibility declaration means the document raised in AP E-cert by an authorised user declaring an identified consignment of animal material or animal products is eligible for export;

eligibility document means the document raised in AP E-cert by an authorised user and approved by an official assurance verifier confirming an identified consignment of animal material or animal products is eligible for export;

export means conveying bee products overseas for reward or for the purposes of trade;

harvest declaration means a declaration made by a beekeeper about bee products intended for export as specified under clause 4.2;

harvest season means the specific period when honey supers are present on beehives primarily for the purpose of honey collection and the bees are producing, or reasonably expected to produce, honey during that period;

homogenisation process means the process of breaking up the characteristics in a batch of bee product so they are evenly distributed and therefore have the same probability of entering a sample;

homogenous batch means a batch of bee products that has been through the homogenisation process;

honey box means any of the boxes in a beehive from which honey may be extracted;

honey super means a box placed on a beehive that contains the frames in which honey is collected;

label means any tag, brand, mark or statement in writing or any representation or design or descriptive matter that:

a) is attached to the packaging of a bee product; or
b) accompanies and is provided to the purchaser with the bee product; or
c) is displayed in connection with the bee product when it is sold;

level 1 national programme means a level 1 national programme that is imposed under the Food Act 2014;

listed beekeeper means a beekeeper who is listed by the Director-General under this Notice or the Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products;

operator means the owner or other person in control of a bee product processing business operating under a risk-based measure;

Guidance

- An operator in this notice is a bee product processing business. Processing includes extraction, transport, storage and therefore would include postal services, courier companies, freight forwarders, any person or facility that extracts or stores honey.

premises of final control means the final premises operating under a risk-based measure where a consignment is physically located before it is transferred to a port of export;

recognised laboratory means a laboratory recognised under section 101 of the Act as a recognised agency and operating in accordance with the Animal Products Notice: Specifications for Laboratories;

representative sample is a sample which is taken from a batch and contains characteristics which accurately reflect the batch;

required validated laboratory test results means the laboratory test results provided by a recognised laboratory, which ascertain whether or not a representative sample of honey meets the definition of monofloral mānuka honey under clause 5.1 or the definition of multifloral mānuka honey under clause 5.2;

risk-based measure for the purposes of this Notice means an RMP, a level 1 national programme under the Food Act 2014, or where an operator operates under a stricter risk-based measure under the Food Act 2014 (i.e. food control plan, level 2 or 3 national programme) that risk-based measure;

RMP means a risk management programme that is currently registered under Part 2 of the Act;

sample means the definite quantity of bee product that is required for the purpose of testing. A sample may only be split by a recognised laboratory to form multiple test items;

substance means:

d) any element, defined mixture of elements, compounds, or defined mixture of compounds, either naturally occurring or produced synthetically, and included any mixtures of those; and
e) any isotope, allotrope, isomer, congener, radical or ion of an element or compound which is a different substance from that element or compound; and
f) any mixtures of combinations of any of the above;

transfer document means:

a) an eligibility declaration or eligibility document raised in AP E-cert by an authorised user as specified in clause 4.4.2(1); or
b) a document of the type specified in clause 4.4.2(2), which is raised by a consignor who is not an authorised user;

tutin means the chemical compound (CAS No 2571-22-4) that causes toxicity in honey and results from bees gathering honeydew exudates from passion vine hoppers that have been feeding on the sap of tutu; and

tutu means *Coriaria arborea* or *Coriaria sarmentosa*.

(2) Terms that are defined in the Act and used, but not defined, in this Notice have the definitions given in the Act.

Part 2: Responsibilities under this Notice

2.1 Outline of beekeepers' responsibilities under this Notice

(1) Beekeepers have a responsibility under this Notice to comply with:

a) fitness for purpose requirements under clause 3.1; and
b) listing requirements under clause 3.3, where applicable; and
c) pre-processing traceability requirements under clause 4.1; and
d) requirements relating to harvest declarations under clause 4.2; and
e) requirements relating to transfer documents under clause 4.3, 4.4 and 4.5, where applicable;
f) recordkeeping requirements under Part 7.

2.2 Outline of operators' responsibilities under this Notice

(1) Operators have the following responsibilities under this Notice to:

a) ensure that honey is not adulterated after extraction as per clause 3.1(3); and
b) process bee products in premises operating under a risk-based measure pursuant to clause 3.2(1); and
c) process bee products intended for export with official assurances in premises operating under an RMP pursuant to clause 3.2(2); and
d) source bee products intended for export from listed beekeepers pursuant to clause 3.3.1; and
e) ensure that every delivery of bee products they receive for processing at their premises is associated with the relevant harvest declaration pursuant to clause 4.2; and
f) comply with the requirements of clause 4.3, 4.4 and 4.5 in relation to transfer documents; and
g) comply with the requirements of clause 5.3 in relation to the labelling of monofloral or multifloral mānuka honey; and
h) comply with the requirements of clause 5.4(1) in relation to information to be included in the final eligibility document for monofloral or multifloral mānuka honey consignments; and
i) comply with the requirements of Part 6 in relation to laboratory tests; and
j) comply with the record-keeping requirements of Part 7; and
k) comply with the requirements of Part 8 in relation to the management of stock in trade.

2.3 Outline of exporters' responsibilities under this Notice

(1) Exporters have the responsibility under this Notice to:

a) export only bee products that have been processed and handled in accordance with this Notice; and
b) comply with the requirements of clause 5.3 in relation to the labelling of monofloral or multifloral mānuka honey; and
c) comply with the requirements of clause 5.4(2) in relation to information to be included in export certificate requests for monofloral or multifloral mānuka honey consignments; and
d) comply with the requirements of Part 8 in relation to the management of stock in trade.

2.4 Outline of responsibilities for recognised agencies and recognised persons under this Notice

(1) Recognised agencies and recognised persons have a responsibility under this Notice in relation to the verification of mānuka honey claims pursuant to clauses 5.5 and 5.6.

2.5 Relationship between this Notice and certain food standards issued under the Food Act 2014

(1) Beekeepers, exporters and operators have a responsibility to comply with applicable provisions of the:

a) Food Standard: Tutin in Honey; and
b) Australia New Zealand Food Standards Code.

Guidance: For the purposes of compliance with the Food Standards Code, guidance on key sections of the Code is set out below.

(1) Compositional requirements for honey

- Exporters and operators should not sell a bee product as honey unless it conforms to the following standards in the Australia New Zealand Food Standards Code:

  a) the definition of honey in Section 1.1.2—3; and
  b) the compositional requirements for honey in Standard 2.8.2.

- Section 1.1.2-3 of the Code defines honey as follows:

  honey *means the natural sweet substance produced by honey bees from the nectar of blossoms or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which honey bees collect, transform and combine with specific substances of their own, store and leave in the honey comb to ripen and mature.*

- Standard 2.8.2 of the Code sets out the composition of honey as follows:

  A food that is sold as 'honey' must:

  c) be honey; and
  d) contain:

    i) no less than 60% reducing sugars; and
    ii) no more than 21 % moisture.

(2) Inclusion of the word "honey" on labels

- Where honey conforms to the definition of honey in section 1.1.2—3 and compositional requirements for honey in Standard 2.8.2, the label should contain the word "honey" as required under Standard 1.2.2-2 of the Australia New Zealand Food Standards Code.

(3) Advisory statements on labels for pollen, propolis and food product containing pollen or propolis as an ingredient

- Exporters and operators who sell food as described in 1.2.1-4 should include the advisory statement, as set out under Standard 1.2.3 and Schedule 9 of the Australia New Zealand Food Standards Code, on the label for bee pollen, propolis, and food containing pollen or propolis:

  a) for pollen or food product containing pollen as an ingredient, the advisory statement is a statement indicating that the product contains bee pollen which can cause severe allergic reactions; and
  b) for propolis or food product containing propolis as an ingredient the advisory statement is a statement indicating that the product contains propolis which can cause severe allergic reactions.

(4) Warning statement on labels for royal jelly, or food product containing royal jelly as an ingredient

- Exporters and operators who sell food as described in 1.2.1-4 should ensure that the label for royal jelly or food product containing royal jelly includes a warning statement in the

exact words prescribed under Standard 1.2.3 of the Australia New Zealand Food Standards Code and comply with the legibility requirements under section 1.2.1—25 of that Code.

- The exact wording of the mandatory statement for labelling royal jelly is as follows:

  a) "This product contains royal jelly which has been reported to cause severe allergic reactions and in rare cases, fatalities, especially in asthma and allergy sufferers."

- Section 1.2.1—25 of the Australia New Zealand Food Standards Code requires the warning statement on the label to be written in a size of type of at least 1.5 mm for a small package or otherwise in a size of type of at least 3 mm.

(5) Labelling requirements where honey is mixed with pollen, royal jelly or propolis

- Where pollen, royal jelly or propolis are added to or mixed with honey, the label on the final product should comply with the above requirements relating to advisory and warning statements.

(6) Labelling requirements regarding therapeutic, health and nutritional claims

- In order to be eligible for export, labelling of bee products should comply with Standard 1.2.7 of the Australia New Zealand Food Standards Code in respect of nutrition, health, therapeutic and related claims.
- Standard 1.2.7 prohibits therapeutic claims on labels for food products. If businesses wish to make therapeutic claims, they must meet the requirements of the Medicines Act 1981 and not sell the bee product as a food. Medsafe is the responsible regulatory body for the Medicines Act.
- The use of grading systems should not be based on parameters which are therapeutic claims or health claims.

(7) Labelling requirements regarding date marking

- In order to be eligible for export retail ready bee products with a shelf life of less than two years should be date marked on labels as required under Standard 1.2.5 of the Australia New Zealand Food Standards Code.
- It should be noted that clause 2.1.2 of the Animal Products Notice: Honey and Honey Based Products – Food Standards Exemption (issued 2 March 2015) exempts products from Standard 1.2.5 if the products:

  a) are for export to a country with different date marking (or equivalent) requirements from the Food Standards Code, specified in legislation; and
  b) comply with the date marking (or equivalent) requirements of the country to which it is intended to be exported.

(8) Labelling requirements regarding nutrition information

- In order to be eligible for export, labelling of bee products should comply with Standard 1.2.8 of the Australia New Zealand Food Standards Code in respect of the inclusion of nutrition information.
- It should be noted that clause 2.1.1 of the Animal Products Notice: Honey and Honey Based Products – Food Standards Exemption (issued 2 March 2015) exempts products from Standard 1.2.8 if the products:

  a) are for export to a country with different nutritional information panel (or equivalent) requirements from the Food Standards Code, specified in legislation; and
  b) comply with the nutritional information panel (or equivalent) requirements of the country to which it is intended to be exported.

Part 3: Requirements relating to production, processing and preparation

3.1 Bee products to be fit for purpose

(1) Beekeepers must ensure that:

a) bees are not fed with anything other than honey during the harvest season, unless any other feeding method is necessary for the survival of the bees; and
b) bee products they harvest do not contain extraneous objects, material, and substances of a kind not expected to be in bee products that are prepared or packed for trade; and
c) where there is a potential presence of substances of a kind expected to be in bee products, these do not exceed applicable regulatory maximum permissible levels; and
d) at the time of harvest, the hives are free from clinical signs of AFB.

(2) For the purposes of sub clause (1)(a), where a beekeeper feeds bees anything other than honey for the survival of the bees, the beekeeper must document the circumstances which necessitate such action.

(3) Operators must ensure that where bee product is intended to be sold as honey, nothing, other than honey, is added to the product after extraction.

Guidance

- The restriction to feeding in clause 3.1(1)(a) only applies at the specific period when the supers are on the hives primarily for the purpose of honey collection and the bees are indeed producing, or reasonably expected to produce honey. During that specific period (i.e. harvest season), feeding can only be carried out if necessary for bee survival. Feeding methods should conform to industry best practice.
- In relation to clause 3.1(1)(c), the maximum permissible level of relevant specified substances in New Zealand are set out in:
  - Food Notice: Maximum Residue Levels for Agricultural Compounds or any notice that replaces that Notice; and
  - General Requirements for Export (GREX) Notification 08/035: Contaminant Requirements for Bee Products for Export.
- Some overseas countries may have different limits, in which case their limits have to be complied with.
- To minimise the likelihood of residues and contaminants ending up in honey, it is strongly recommended that honey is not harvested from broodcombs. Broodcombs are known to harbour substances such as fungal and bacterial spores, pesticide residues, heavy metals etc.
- In relation to clause 3.1(1)(d), for recommended ways for checking for a range of symptoms to accurately determine the presence of AFB, please refer to the AFB Management Agency website: http://www.afb.org.nz/symptoms-of-afb
- In relation to clause 3.1(3), please note that Schedule 15 of the Food Standards Code does not allow for the presence of food additives in honey.
- Beekeepers should be particularly aware of the requirements set out in clause 13.45 of the Animal Products Notice: Specifications for Products Intended for Human Consumption. That clause 13.45 requires apiarists and beekeepers to ensure that:
  - beehives are constructed of and maintained with materials that are not sources of hazard to the honey or other bee products; and
  - honey supers, both before and after extraction, are stored in a manner that will minimise contamination; and
  - honey supers are protected from contamination during transportation to minimise exposure to dusts, fumes and other contaminants.

3.2 Bee products to be processed in premises operating under a risk-based measure

(1) Secondary processing of all bee products intended for export must be carried out at premises operating under a risk-based measure.

(2) To avoid doubt, secondary processing of all bee products intended for export to countries for which official assurances are required must be carried out at premises operating under an RMP.

Guidance

- In relation to clause 3.2(1), a risk-based measure is either an RMP registered under the Animal Products Act 1999 or at least a Level 1 National Programme registered under the Food Act 2014. Operators should be aware, however, that bee products processed within premises operating under a Level 1 and 2 National Programme can only be exported to countries not requiring official assurances (i.e. the bee products are not eligible for an MPI export certificate).
- A Food Control Plan (FCP) registered under the Food Act 2014 may be recognised as an RMP under the Animal Products Act 1999 in accordance with section 34 of the Animal Products Act 1999. If an operator's FCP is recognised as an RMP, the operator's premises is allowed to process bee products for export to countries requiring official assurances. Bee products processed by premises operating under an FCP that is not recognised as an RMP are not eligible for export to countries requiring official assurances.
- At the time of publication of this Notice, countries requiring official assurances include Australia, China, European Union countries including the United Kingdom, Eurasian Economic Union (i.e. Russia, Armenia, Belarus, Kazakhstan, and Kyrgyzstan), Japan, Malaysia and the United Arab Emirates. Exporters and operators should always refer to the relevant MPI website on OMARs for the up to date list of countries requiring official assurances.
- Beekeepers who are not secondary processors are not required to operate under a risk-based measure.
- Secondary processing of bee products includes any of the following process beyond primary processing: extraction, manufacture, packing, preserving, and storage.

3.3 Bee products to be sourced from listed beekeepers

3.3.1 Sourcing of bee products

(1) Subject to sub clause (4) bee products are not eligible for export unless the products are harvested from:

a) listed beekeepers; or
b) beekeepers who operate under a risk-based measure; or
c) beekeepers who have an exclusive written supply contract with an RMP operator and whose activities are covered by the operator's RMP.

(2) To avoid doubt, where honey extracted from non-listed beekeepers is blended with other honey, the blended product is not eligible for export.

(3) Operators must have a system which clearly identifies and distinguishes between bee products sourced from beekeepers of the classes specified in sub clause (1) and bee products sourced from beekeepers that are not of the classes specified in sub clause (1).

(4) Where a beekeeper who is required to be listed under this Notice supplied bee products to an operator before being listed and before the commencement of subclause (1), the bee products:

a) are eligible for export to countries for which official assurances are not required;
b) are not eligible for export to countries for which official assurances are required.

3.3.2 Application for listing of beekeepers

(1) A beekeeper may apply to the Director-General to be listed by:

a) applying in the manner and form approved by the Director-General; and
b) paying the applicable fee (if any is prescribed by regulations).

(2) An application for listing must contain the following information, which must be current at the time of application:

a) the beekeeper's name and, if different, trading name; and
b) the beekeeper's address and, if different, his or her business address; and
c) the beekeeper's contact details, as specified by the Director-General.

3.3.3 Listing of beekeepers by the Director-General

(1) The Director-General must add a beekeeper to the list under clause 3.3.4, with a unique listing identification unless:

a) the beekeeper has been delisted in the past under this Notice or the Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products; and
b) in the opinion of the Director-General, the person should not, at the time of application, be permitted to be listed having regard to implications on market access or the likelihood of the beekeeper to engage in activities that led to delisting in the first place.

(2) The listing of a beekeeper by the Director-General under this clause is valid for a term of 12 months from the date of listing unless the beekeeper is removed from the list at an earlier date in accordance with clause 3.3.6.

(3) Beekeepers who have been listed by the Director-General pursuant to clause 7.4 of the Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products are deemed to be listed beekeepers for the purposes of this Notice.

3.3.4 Beekeeper list

(1) The Director-General must keep all of the information in clause 3.3.2(2).

(2) The Director-General may decide which of the information in clause 3.3.2(2) is made publicly available.

(3) Beekeepers must update their listing, in the manner and form required by the Director-General, whenever any of the information in clause 3.3.2 (2) changes.

(4) The beekeeper list may be maintained by the Director-General in whatever form the Director-General considers appropriate.

3.3.5 Renewal of listing

(1) Subject to sub clause (2), a beekeeper must apply for renewal of their listing in accordance with clause 3.3.2 prior to the expiry of the 12 months term specified in clause 3.3.3(2).

(2) Where there is no change to the information provided by the beekeeper during the most recent listing or renewal, an application for renewal may include only a written confirmation that the required information is exactly the same as sighted by the Director-General during the most recent listing or renewal.

3.3.6 Removal of beekeepers from the beekeeper list

(1) The Director-General may remove a beekeeper from the beekeeper list in any of the following circumstances:

a) the Director-General believes on reasonable grounds that any of the information on the list is incorrect or no longer current; or

b) the listing has expired and the beekeeper has not applied for renewal in accordance with clause 3.3.5; or
c) the beekeeper has failed to update the information on the list when asked to do so, or has at any time provided incorrect information; or
d) the beekeeper, or any person engaged by the beekeeper in an activity associated with the beekeeping business, has been convicted of an offence involving fraud or dishonesty in connection with beekeeping, hive management, or any business involving bee product; or
e) the Director-General believes on reasonable grounds that:

   i) the beekeeper, or any person engaged by the beekeeper in an activity associated with the beekeeping business, is or has been involved in illegal activity in connection with beekeeping, hive management, or any business involving bee product; or
   ii) the beekeeper has knowingly provided false or misleading information in a harvest declaration; or
   iii) the beekeeper is no longer involved in beekeeping business; or

f) the beekeeper asks to be delisted.

(2) Where the Director-General proposes to remove a beekeeper from the beekeeper list, the Director-General must (unless the beekeeper cannot reasonably be found):

a) notify the beekeeper in writing of the intention to remove them from the list and such particulars as will clearly inform the beekeeper of the substance of the grounds on which the Director-General proposes to refuse to remove the beekeeper from the list; and
b) give the beekeeper a reasonable opportunity to respond to the proposal to delist unless the beekeeper has asked to be delisted.

(3) Where the Director-General finally determines to remove a beekeeper from the beekeeper list, the Director-General must as soon as practicable notify the beekeeper in writing of:

a) the decision; and
b) the reasons for the decision, and the facts or assumptions on which it is based.

(4) Despite sub clauses (1), (2) and (3), the Director-General may immediately remove a beekeeper from the beekeeper list without prior notification if the Director-General reasonably believes that the beekeeper has committed an act or omission in relation to beekeeping which threatens market access.

(5) A person who has been removed from the beekeeper list may apply for listing again at any time.

Guidance

- In practice, clause 3.3 would largely impact beekeepers who supply bee products for export to countries not requiring official assurances. Beekeepers who supply bee products for export to countries requiring official assurances are already required to be listed under the Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products.
- In relation to clause 3.3.1(1), from 11 June 2018, a beekeeper should be listed before he or she supplies bee products to an operator. If the beekeeper is not listed when he or she supplies the bee products to the operator, the bee products would not be eligible for export to any market.
- In relation to clause 3.3.1(4), all bee products supplied by an unlisted beekeeper to an operator before 11 June 2018 would be eligible for export to countries not requiring official assurances. The products cannot be exported to countries that require official assurances because there was already a requirement, before this Notice was issued, for beekeepers who supply to those countries to be listed, as stated in the second bullet point above. Any dispensation would have to be applied for under the Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products.

Part 4: Requirements relating to traceability

4.1 Pre-processing traceability requirements

(1) Beekeepers must:

a) permanently mark all honey boxes presented for extraction with the beekeeper's allocated identification code under the AFBPMP or a different code which achieves equivalent or better identification; and
b) for each apiary site from which bee products are harvested, keep records of the following information:

i) the global positioning system (GPS) location of the apiary site; and
ii) a unique identification code for that site; and
iii) the number of honey supers at the site; and
iv) the volumes or units of each bee product type harvested from that site and the date of harvest; and
v) a copy of every harvest declaration pertaining to honey harvested from supers in that site and the number of supers contributing to each harvest declaration.

c) provide any of the information specified in paragraph (b) to any of the following officials, as applicable, within 24 hours of a request being made by any of them:

i) the Director-General;
ii) an animal product officer;
iii) recognised agency or recognised person; or
iv) an authorised person.

(2) Where honey boxes are sold:

a) the identification code of the previous owner must be struck through so that it is still legible; and
b) the boxes must be permanently marked with the identification code of the new owner.

Guidance

- Beekeepers should be aware that all apiary sites used for honey production are required to be registered under the AFBPMP.
- In relation to clause 4.1(1)(b)(i), GPS location includes a topographic map with the sites clearly identified.

4.2 Traceability from beekeepers to operators - Harvest declarations

4.2.1 Beekeeper to provide harvest declaration

(1) A beekeeper must prepare a harvest declaration for every delivery of bee products that the beekeeper intends to supply to an operator for export and provide the declaration to the operator who first processes the bee products.

4.2.2 Contents of a harvest declaration

(1) A harvest declaration must include the following information:

a) name and business address of the beekeeper; and
b) the beekeeper's RMP ID or beekeeper listing ID (when the beekeeper listing requirement in clause 3.3 comes into force) (whichever is applicable); and
c) the beekeepers identification code as allocated under the AFBPMP; and

d) the code used by the beekeeper under clause 4.1(1)(a) to mark their honey boxes, if different from the allocated identification code under the AFBPMP, when that requirement comes into force; and
e) the unique identification code for each apiary site where the bee products are harvested from; and
f) name and risk-based measure ID of the operator receiving the bee product; and
g) bee product type; and
h) quantity and unit (supers, boxes) of bee products; and
i) date of harvest of the bee products; and
j) declaration of compliance with the ACVM Act 1997 where agricultural compounds were used on or in the hives; and
k) if the bee products are honey, identify whether it needs to be tested for tutin and, if not, on what grounds; and
l) declaration that hives were free from clinical signs of AFB at the time of harvest; and
m) declaration that bees were not fed with feed other than honey during the harvest season, except as permitted under clause 3.1(1)(a); and
n) declaration that the harvesting, storage, and delivery of the bee product minimised its exposure to contamination.

4.2.3 Form of a harvest declaration

(1) Subject to sub clause (2), a harvest declaration must be in the form notified by the Director-General on the relevant MPI website.

(2) Where the beekeeper is also an operator operating under a risk-based measure, the harvest declaration may be in a form or system that is different to that notified by the Director-General provided it clearly sets out the information required under sub clause 4.2.2 in relation to every delivery of bee products.

4.2.4 Validity of a harvest declaration

(1) A harvest declaration is not valid unless:

a) it is signed and dated, or where sub clause 4.2.3(2) applies, formally confirmed, by the beekeeper who submits it; and
b) the information it contains is complete, accurate and truthful.

(2) For every harvest declaration received by an operator from a beekeeper, the operator must:

a) sign and date the harvest declaration; and
b) assign a unique reference number containing the beekeeper's allocated identification code under the AFBPMP and unique digit(s) (for example; AFB Code/01 where "AFB code" is the allocated code under the AFBPMP and "01" are the digits unique to that harvest declaration); and
c) stamp or imprint the number referred to in paragraph (b) on to the harvest declaration.

(3) The operator must retain a copy of every harvest declaration supplied by a beekeeper.

(4) The operator who first processes the bee products must not commence processing the bee product, and must not transfer it to a third party, unless:

a) the harvest declaration has been received; and
b) the honey boxes presented by the beekeepers are marked as required under clause 4.1(1)(a), when that requirement comes into force; and
c) the operator has checked the harvest declaration to ensure it is complete and reasonably believes the harvest declaration to be accurate and truthful.

4.3 Traceability between operators when an official assurance is required

4.3.1 Application

(1) Clause 4.3 applies to all bee products intended for export to countries for which official assurances are required.

4.3.2 Requirements to obtain an official assurance

(1) All operators undertaking secondary processing of bee products must meet the following requirements:

a) have an RMP
b) raise transfer documents in AP E-cert.

Guidance

- Bee products intended for export to countries which require official assurances are subject to the traceability provisions in the Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products.

4.4 Transfer documents not in AP E-cert where an official assurance is not required

4.4.1 Contents of a transfer document

(1) A transfer document must contain the following information:

a) name and risk-based measure ID of the consignor; and
b) name and risk-based measure ID of the consignee; and
c) source transfer document for the consignment; and
d) departure date for the consignment; and
e) product description of the consignment; and
f) packing unit for the consignment; and
g) quantity of unit for the consignment; and
h) net weight for the consignment; and
i) list of markets for which the consignment is eligible; and
j) if the bee products are honey, identify whether it needs to be tested for tutin and, if not, on what grounds; and
k) declaration of whether the product is fit for purpose.

4.4.2 Form of a transfer document

(1) Where both the consignor and consignee are operating under an RMP, the transfer document must be in the form of an eligibility declaration or eligibility document generated in AP E-cert.

(2) Where the consignor or the consignee is operating under a Food Act risk-based measure, the transfer document may:

a) be in the form notified by the Director-General on the relevant MPI website; or
b) be in a form or system that is different to that notified by the Director-General provided the form or system:

i) clearly sets out the information required under clause 4.4.1 in relation to the transfer of every consignment; and
ii) is capable of clearly communicating the required information between the consignor and the consignee.

Guidance

- The transfer document template can be found at this link: www.mpi.govt.nz/dmsdocument/27390-transfer-document-for-bee-products-for-export

4.4.3 Transfers prior to 5 February 2018

(1) Where a consignment of bee products was transferred from one premises to another without a transfer document before the 5 February 2018, the consignment is eligible for export to countries not requiring official assurances provided any further transfer after the 5 February 2018 was associated with a transfer document.

4.5 Traceability between operators when an official assurance is not required

4.5.1 Application

(1) Clause 4.5 applies to all bee products intended for export to countries for which official assurances are not required.

4.5.2 When a transfer document is required

(1) Where a consignment of bee products is transferred from one premises to another, the operator of the sending premises (the consignor) must provide a transfer document to the operator of the receiving premises (the consignee) except as provided for in 4.5.3 (1) and 4.5.3.(3).

(2) Where a consignment of bee products is transferred from the premises of final control to the port of export, the operator of the premises of final control must provide a transfer document to the exporter except as provided for in 4.5.2 (3) b). and 4.5.3 (2).

Guidance

- The premises of final control will most likely belong to a transport operator (e.g. courier, freight forwarder or postal service).

(3) Where the requirements in 4.5.3(3) are met:

a) a transfer document is only required up to the premises prior to the parcel being transferred to a postal or courier service.
b) a transfer document is not required for a transfer between premises operated by a postal or courier service.
c) a consignor operating on behalf of the exporter must send a copy of either of the following to the exporter:

i) the unique batch numbers and product identification of the honey being exported
ii) the source transfer document number of honey being exported.

Guidance

- Postal services includes Post shops
- In some situations an exporter may use a third party to deliver honey to the postal or courier service, clause 4.5.2(3)c) above ensures that the exporter has a copy of the records related to the exported consignment. This ensures the exporter meets their obligations under part 7 of this Notice.

4.5.3 When a transfer document is not required.

(1) A transfer document is not required for the transfer of bee products between premises if the premises are owned or occupied by the same operator and the following are met:

a) the premises are subject to an inventory control system that provides for adequate traceability equivalent to that provided for by transfer documents
b) the transfer is under the direct oversight of the operator.

(2) A transfer document is not required for the transfer of bee products from the operator of the premises of final control to the exporter if the exporter and the operator are the same person and the following requirements are met:

a) the transferred bee products are accurately and comprehensively identified through an inventory control system
b) the inventory control system provides an adequate traceability equivalent to that provided by transfer documents

(3) A transfer document is not required for parcels of bee products that are sent from a premise to a postal or courier service, providing all the following requirements are met:

a) the parcel is less than or equal to 2 kilograms in weight
b) addressed to a private individual
c) be clearly labelled on the outside with the Exporter ID and business address of the exporter
d) clearly labelled on the outside with either of the following:

i) the unique batch number and product identification of the honey being exported; or
ii) the source transfer document number of the honey being exported.

Guidance

- The parcel weight includes any associated packaging, so the weight of honey in the consignment may be less than 2 kilograms.
- Transfer documentation is still required as per clause 4.5.2 until the premises sending to the postal or courier service. For example, honey purchased at a retail shop that does not have the required transfer documentation cannot be exported. Another example is honey stored at a premises, e.g. a private residence, that does not have the required transfer documentation.
- Exporter ID is the ID on the MPI website at https://www.foodsafety.govt.nz/registers-lists/exporters/index.htm

4.6 Reconciliation of traceability documents

(1) Operators must have processes and procedures to demonstrate traceability as follows:

a) the connection between a harvest declaration, the batch or batches into which the bee products in the harvest declaration are put, and the resulting outgoing transfer document (as required under clause 4.4 where a consignment of bee products drawn from that batch or batches is transferred to another premises; and
b) the connection between an incoming transfer document and a resulting outgoing transfer document where a consignment of bee product identified in the incoming transfer document is transferred to another premises with that outgoing transfer document.

(2) Transfer documents that are raised for the transfer of bee products identified in a harvest declaration must contain the unique reference number of that harvest declaration.

Part 5: Labelling of monofloral and multiflora mānuka honey

5.1 Definition of monofloral mānuka honey

(1) A batch of honey is monofloral mānuka honey if all of the following attributes are detected using laboratory tests carried out in accordance with Part 6:

a) ≥ 5 mg/kg 2'-methoxyacetophenone; and
b) ≥ 1 mg/kg 2-methoxybenzoic acid; and
c) ≥ 1 mg/kg 4-hydroxyphenyllactic acid; and
d) ≥ 400 mg/kg 3-phenyllactic acid; and
e) DNA from mānuka pollen (< Cq 36 which is approximately 3 fg/µL DNA).

5.2 Definition of multifloral mānuka honey

(1) A batch of honey is multifloral mānuka honey if all of the following attributes are detected using laboratory tests carried out in accordance with Part 6:

a) ≥ 1 mg/kg 2'-methoxyacetophenone; and
b) ≥ 1 mg/kg 2-methoxybenzoic acid; and
c) ≥ 1 mg/kg 4-hydroxyphenyllactic acid; and
d) ≥ 20 mg/kg but < 400 mg/kg 3-phenyllactic acid; and
e) DNA from mānuka pollen (< Cq 36 which is approximately 3 fg/µL DNA).

5.3 Restrictions in relation to labelling export honey as mānuka honey

(1) Operators who process honey for export and exporters of honey must not:

a) label honey as 'mānuka', 'monofloral mānuka', or any other term that implies that the honey only consists of mānuka honey, unless it meets the definition of monofloral mānuka honey under clause 5.1; or
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 multifloral 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 sub clause (1) of this clause.

(3) Where an operator or exporter has a registered trademark or a registered legal entity name containing the word "mānuka" and intends to include that trademark or registered legal entity name on the label of honey that does not meet either of the definitions in clause 5.1 or 5.2, the operator or the exporter must:

a) ensure that the appearance of the trademark or registered legal entity name 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.

(4) Except as provided in sub clause (3), where an operator or exporter has a trading name containing the word "mānuka", the operator or exporter must not include that trading name on the label of honey that does not meet either of the definitions in clause 5.1 or 5.2.

(5) Exporters must only export mānuka honey that is labelled in accordance with sub clauses (1) – (4).

(6) Where honey is labelled as mānuka honey, operators, and exporters (where applicable), must have the required validated laboratory test results and must be able to provide these in accordance with clause 5.4 (where applicable) or to any of the following persons within 24 hours of a request being made:

a) Director-General; or
b) an animal product officer; or
c) a recognised agency or person; or
d) an authorised person; or
e) any other person authorised by the Director-General.

5.4 Export certification of mānuka honey for export to countries requiring official assurances

(1) Operators of premises of final control must ensure that all final eligibility documents they raise in AP E-cert in relation to consignments of honey labelled as monofloral or multifloral mānuka honey include:

a) the required validated laboratory test results proving that each batch of honey in a consignment is monofloral or multifloral mānuka honey; and
b) in the product description field, the exact monofloral or multifloral mānuka honey statement that is intended to be stated in any resulting export certificates.

(2) Exporters must ensure that all export certificate requests they raise in AP E-cert in relation to honey labelled as monofloral or multifloral mānuka honey include:

a) the required validated laboratory test results proving that each batch of honey in a consignment is monofloral or multifloral mānuka honey; and
b) in the product description field, the exact monofloral or multifloral mānuka honey statement that is intended to be stated in the export certificates.

5.5 Verification of mānuka honey claim during export certification

(1) If the recognised agency or recognised person has good reasons to doubt the integrity of test results provided in accordance with clause 5.4(1)(a) or clause 5.4(2)(a), the recognised agency or recognised person may arrange for a representative sample from that affected batch to be re-tested.

5.6 Verification of mānuka honey claim during performance-based verification for official assurance purposes

(1) During each verification visit of honey RMP premises as required under the Animal Products Notice: Export Verification Requirements, the responsible recognised agency or recognised person must check a collection of laboratory test results associated with any honey that is labelled or identified as monofloral or multifloral mānuka honey.

(2) If the recognised agency or recognised person has good reasons to doubt the integrity of test results associated with a homogenous batch of monofloral or multifloral mānuka honey, the recognised agency or recognised person may arrange for a representative sample from that batch to be re-tested.

Part 6: Laboratory tests for mānuka honey

6.1 Laboratory tests to be carried out by a recognised laboratory

(1) Laboratory tests to determine whether a batch of honey meets the definition of monofloral mānuka honey in clause 5.1 or multifloral mānuka honey in clause 5.2 must be carried out by a recognised laboratory that is recognised to perform the tests specified in clause 6.3.

6.2 Laboratory test for mānuka honey

(1) Where an operator intends to label a batch of honey as monofloral or multifloral mānuka honey, the operator must provide a representative sample from that batch to a recognised laboratory to be tested for compliance with the applicable definition under clause 5.1 or clause 5.2.

(2) Where a recognised laboratory (principal laboratory) is only accredited to test for parts (but not all) of the attributes which make up either of the definitions of monofloral mānuka honey under clause 5.1 or multifloral mānuka honey under clause 5.2, the principal laboratory must arrange for testing for the other parts of the attributes with a recognised laboratory that is accredited for that purpose (secondary laboratory).

(3) For the purposes of sub clause (2), the principal laboratory must:

a) ensure homogeneity of the received sample prior to subsampling for testing at the secondary laboratory; and
b) send subsamples under appropriate controlled conditions to ensure integrity of the sample and associated test results, and
c) compile the results of tests carried out by both laboratories into one report and provide the report to the operator.

6.3 Test Method

(1) The operator of a recognised laboratory which tests honey samples to ascertain whether or not the samples meet the definition of monofloral mānuka honey under clause 5.1 or multifloral mānuka honey under clause 5.2 must use the two test methods specified for that purpose in the Animal Products Notice: Specifications for Laboratories and the Consolidated List of Tests for Animal Products: meat, poultry, honey, seafood, dairy, live animals and germplasm.

6.4 Sampling requirements

6.4.1 General requirement

(1) The operator must ensure that any person taking a sample for a laboratory test on their behalf is adequately trained in the techniques of sample collection.

(2) Sampling for the purpose of laboratory tests must be conducted in a manner which will maintain the integrity of the sample associated with the batch.

(3) Operators must ensure that:

a) equipment, materials and apparatus which are used for sampling are appropriate for maintaining the condition of the sample; and
b) there is no potential for cross-contamination from such equipment, materials and apparatus.

Guidance

- In relation to sub clause (1), operators may seek independent sampling advice or training.

6.4.2 Representative sampling and homogeneity of batches

(1) Any sample of honey that is taken for the purpose of laboratory tests must be a representative sample randomly taken from a homogenous batch.

Guidance

- A sample may be taken from a bulk tank or from several containers of the same batch.
- Where the sample is taken from a bulk tank, one way of ensuring representativeness would be to carry out the following:
  - mix the honey thoroughly to ensure uniformity of characteristics immediately before sampling; and
  - immediately after mixing take the required quantity of honey sample with the help of an appropriate equipment (e.g. dipper, tube).
- Where the sample is taken from several containers of the same batch, one way of ensuring representativeness would be to carry out the following for all containers:
  - mix the honey thoroughly; and
  - take proportionate quantity of honey in a separate vessel; and
  - mix the honey from the separate vessels in one container from which proportionate quantity of honey samples from different containers are taken; and
  - take final sample from the one container referred to in c) with the help of an appropriate equipment (e.g. dipper, tube, syringes).

6.4.3 Integrity of samples during transit

(1) Operators must ensure that containers containing laboratory samples are:

a) clean containers that will not contaminate the sample and will adequately protect the sample from external contamination and damage in transit; and
b) sealed in such a manner that enables detection of any unauthorised opening; and
c) sent to the recognised laboratory as soon as possible taking any necessary precautions against leakage or spoilage.

6.4.4 Internal system for documenting sampling information

(1) Operators involved in sampling must maintain an internal system documenting the following information:

a) identity of each sample and the homogenous batch from which it was drawn; and
b) reason for sampling; and
c) method for sample collection used; and
d) batch size; and
e) sample size; and
f) homogenisation process;
g) measures for ensuring that any sample taken is representative of the batch; and
h) date and place of sampling; and
i) date the sample is sent to the laboratory; and

j) date the laboratory test results are received by the operator; and
k) any action carried out by the operator in relation to the test results; and
l) name of the sampler.

6.5 Interpretation of test results

(1) Operators who arrange for laboratory tests:

a) are primarily responsible for interpreting the laboratory test results; and
b) must keep records that demonstrate the connection between the test results, the sample that was tested, and the batch from which the sample was drawn.

(2) Nothing in sub clause (1)(a) prevents an operator from making an arrangement with the recognised laboratory to interpret the test results on the operator's behalf.

Guidance

- Interpretation of laboratory test results by operators should always take into account the test results on all attributes stated in clause 5.1 or 5.2 of this Notice (i.e. both the chemistry and DNA attributes).

Part 7: Record-keeping requirements

7.1 Records to be kept

(1) Operators must keep the following records in relation to bee products that are presented for export:

a) any harvest declarations held by the operator; and
b) any transfer documents received or sent by the operator; and
c) records specified in clauses 5.3(6), 6.4.4 and 6.5(1)(b).

(2) Beekeepers must keep the records referred to in clauses 3.1(2) and 4.1(1)(b).

(3) Records referred to in sub clauses (1) and (2):

a) may be kept in hard copy or electronic form; and
b) must be kept for at least 4 years from when the records were made and, if the records were made by an exporter, must be kept until at least the expiry date of the bee products to which they relate; and
c) must be complete and accurate; and
d) must be readily accessible to be provided to any of the following persons within 24 hours of a request being made:

i) Director-General; or
ii) an animal product officer; or
iii) a recognised agency or person; or
iv) an authorised person; or
v) any other person authorised by the Director-General.

Part 8: Mānuka honey testing prior to 5 February 2018

(1) Laboratory tests carried out before the 5 February 2018, to establish the compliance of honey with the definition of monofloral mānuka honey or multifloral mānuka honey meet the requirements of Part 6 of this Notice if:

a) the tests were test number 10.04 and 10.05 in the MPI Consolidated List of Tests for Animal Products: meat, poultry, honey, seafood, dairy, live animals and germplasm; and
b) the test was carried out by a laboratory that has subsequently been recognised by the Director-General to carry out these tests; and
c) the applicable requirements specified in Part 6 of this Notice, including sampling requirements, were met.

(2) The operator or exporter may label honey as monofloral mānuka honey or multifloral mānuka honey in accordance with the labelling requirements in clause 5.3 on the basis of test results referred to in sub clause (1).

Guidance

- Prior to 5 February 2018, testing was undertaken by operators to meet the mānuka honey definitions but there were no recognised laboratories. Tests results from Analytica Laboratories Limited (L1939) and R J Hill Laboratories Limited (L1944) prior to this date are however acceptable.
- All other requirements of Part 6 (i.e. test to be carried out in a recognised laboratory, sampling requirements, ability to demonstrate the connection between the test results, the honey and the sample etc.) should also be complied with.
- The purpose of sub clause (2) above is to clarify that where an exporter/operator is relying on this validation clause, the labelling restrictions in cl 5.3 applies, AP E-cert process in clause 5.4 applies if the exporter/operator wants an official assurance, and the verification provisions of clause 5.5 and 5.6 apply as well.