



Guidance to the Animal Products Notice: General Export Requirements for Bee Products

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Title

Guidance Document: Guidance to the Animal Products Notice: General Export Requirements for Bee Products

About this document

This document provides guidance to beekeepers, operators, and exporters on the requirements set out in the Animal Products Notice: General Export Requirements for Bee Products.

Document history

No.	Version Date	Section Changed	Change(s) Description
1.	February 2018	New	Not applicable
2.	February 2021	All 1.1 3.2.1 4 6.2 Various	Aligning section numbers with the Notice Application Requirement to operate under a risk-based measure Step by step guide for export with and without official assurances Recognised laboratories update Minor edits for clarity/accuracy Removal of Transition Clauses
3.			

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1 Purpose

The purpose of this document is to provide guidance to beekeepers, operators, and exporters on the requirements set out in the Animal Products Notice: General Export Requirements for Bee Products (the Notice). This document should be read alongside the Notice.

2 Background

The Ministry for Primary Industries (MPI) issued the Animal Products Notice: General Export Requirements for Bee Products for the purposes of facilitating access for New Zealand bee product exports to overseas markets and for safeguarding assurances provided by New Zealand.

The Notice provides a basis for addressing overseas markets' concerns about the authenticity of New Zealand mānuka honey by introducing a robust scientific definition which could be used as a basis for labelling and certifying New Zealand mānuka honey if required. The definition in the Notice resulted from the MPI Mānuka Honey Science Programme, which ran from 2014 to 2016. The Notice differentiates between monofloral and multifloral mānuka honey. The Notice also specifies requirements relating to sampling and testing.

In addition to the science definition, the Notice introduced requirements relating to traceability and product fitness for purpose. These include beekeeper listing, requirements restricting the feeding of bees to reduce the likely presence of elevated level of feed residues in honey, obligations for ensuring that bee products do not contain extraneous objects, material, and substances at a level higher than the specified regulatory limit, and record keeping requirements for beekeepers.

3 Definitions

Terms used in this guidance document have the same meaning given to it under the Animal Products Notice: General Export Requirements for Bee Products (Part 1.2). Where a term is defined under the Animal Products Act 1999 (the Act) and not the Notice, the Act definition is to be used.

Private Individual means a natural person (not a business or corporation) purchasing bee products for personal use.

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;

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;

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;

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;

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;

4 Guidance to Part 1: Preliminary provisions

4.1 Application

4.1.1 Markets/countries covered by the Notice

The Notice applies to all bee products for export regardless of intended markets. Therefore, the requirements in the Notice apply to beekeepers, operators and exporters regardless of whether or not the intended markets require official assurances. MPI understands that overseas market requirements were correct at the time of publication. Importing market requirements change often without MPI's knowledge. Exporters are required to check that there have been no changes to importing countries requirements.

Bee products purchased from retail outlets (e.g. supermarkets, souvenir shops or farmers markets) without transfer documentation may not be exported overseas as the traceability requirements of the Notice cannot be maintained. Bee products in checked or hand luggage accompanying travellers for personal use are not subject to the Notice, however may be subject to destination market requirements.

4.1.2 Products sold online, generally direct to an overseas customer (e-commerce)

The Notice applies to bee products sold to overseas customers online. Bee products exported through online marketplaces are animal products processed "for reward or for purposes of trade or export" within the scope of the Animal Products Act 1999.

All exporters exporting animal products, including persons exporting bee products through internet marketplaces, are required by the Animal Products Act to be registered with MPI.

Where bee products are sold online to a market requiring an official assurance (e.g. Western Australia, China, European Union, the United Kingdom, Japan, Korea, United Arab Emirates, Malaysia) the exporter is required to apply for an export certificate in MPI's animal products electronic certification system (AP E-cert). The consignment must be accompanied by the export certificate in order to be granted entry into those countries.

Bee products (including honey) sold to all markets (including those that do not require official assurances) must meet the requirements of the Notice.

4.1.3 Multi ingredients products containing mānuka honey

The Notice generally does not apply to products that are, or are being processed to become or form part of, a medicine or related product that is subject to the [Medicines Act 1981](#) (including any cosmetic or dentifrice or food that is a related product within the meaning of [section 94](#) of the Medicines Act 1981).

Importing countries' authorities may, in the future, require official assurances for the export of multi-ingredient products containing mānuka honey. This is typically specified in Overseas Market Access Requirements (OMARs). In such cases, MPI may require evidence that the mānuka honey ingredient meets the definition in the Notice. At the time of publication of this document, there is no such requirement.

Refer to [clause 17 of the Animal Products \(Exemptions and Inclusions\) Order 2000](#) for more information on exemptions relating to multi-ingredient foods.

5 Guidance to Part 2: Responsibilities under the Notice

5.1 Outline of responsibilities (clauses 2.1 – 2.4)

Part 2 of the Notice summarises the responsibilities of different parties (i.e. beekeepers, operators, exporters, recognised agencies and persons etc.) in one place. This is intended to make it easier for each relevant party to locate a summary of what their responsibilities are.

5.2 Food standards and the Food Standards Code (clause 2.5)

Clause 2.5 of the Notice recognises the application of the Tulin Food Standard and the Australia New Zealand Food Standards Code to exported bee products. These standards are issued or adopted under the Food Act 2014. This means that bee products must meet the requirements of these pieces of legislation in order to be eligible for export.

The guidance box under clause 2.5 of the Notice summarises the relevant sections of the Food Standards Code for easy reference. This is also included below.

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 must 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:

 - (a) *be honey; and*
 - (b) *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 must 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 must 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 must 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 must 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 must comply with [Standard 1.2.7](#) of the Australia New Zealand Food Standards Code in respect of nutrition, health, therapeutic and related claims, unless otherwise exempted.
 - Standard 1.2.7 prohibits therapeutic claims on labels for food products unless Nutrient Profiling Score requirements are met, which honey does not. 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 must 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.

6 Guidance to Part 3: Requirements relating to production, processing, and preparation

6.1 Bee products to be fit for purpose

6.1.1 Restriction on feeding of bees [clause 3.1(1)(a)]

The Notice imposes a partial restriction on the feeding of bees during the harvest season, in that bees must not be fed with anything other than honey during that season. The term “harvest season” is defined in the Definitions clause of the Notice (clause 1.2) as “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”.

The purpose of this requirement is to minimise the risks of having elevated levels of feed residues in honey.

The restriction does not apply to periods outside of the harvest season. During the harvest season, the Notice allows feeding of bees under circumstances where this is necessary for colony survival; for example, during severe weather conditions where bees are confined to the hives and feed reserves may have to be supplemented. Under those circumstances, the Notice requires beekeepers to maintain records of the feeding and the reasons for it.

6.1.2 Harvested bee products must not contain extraneous objects, material, or substances [clause 3.1(1)(b) and (c)]

The Notice reinforces the requirement on beekeepers to ensure that 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 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.

This is an outcome-based requirement meaning that it is up to the beekeeper to ensure that this requirement is being met. To help meet this requirement, MPI recommends that honey is not harvested from brood comb, as these are known to harbour substances such as fungal and bacterial spores, pesticide residues, heavy metals etc.

In relation to clause 3.1(1)(c) of the Notice, the maximum permissible level of relevant specified substances in New Zealand are set out in:

- (1) [Food Notice: Maximum Residue Levels for Agricultural Compounds](#) or any notice that replaces that Notice; and
- (2) [General Requirements for Export \(GREX\) Notification 08/035: Contaminant Requirements for Bee Products for Export](#).

Some markets may have different limits, in which case their limits must be complied with.

6.1.3 American Foulbrood [clause 3.1(1)(d)]

The Notice reinforces compliance with existing American Foulbrood (AFB) requirements (set out in the AFBPMP) by requiring beekeepers to ensure that hives are free from clinical signs of AFB. The AFB Management Agency website sets out recommended ways to manage AFB, including methods of inspection and control: [Symptoms of American foulbrood](#) Other ways for ensuring that bee products are fit for purpose

The [Animal Products Notice: Specifications for Products Intended for Human Consumption](#) sets out a number of requirements which ensure that bee products are fit for purpose. These include the following requirements in addition to the Notice as set out in clause 20.2 of that Notice:

- (1) beehives are constructed of and maintained with materials that are not sources of hazard to the honey or other bee products; and
- (2) honey supers, both before and after extraction, are stored in a manner that will minimise contamination; and
- (3) honey supers are protected from contamination during transportation to minimise exposure to dusts, fumes and other contaminants.

6.2 Bee products to be processed by operators operating under a registered risk-based measure

6.2.1 Requirement to operate under a risk-based measure

The requirement for operators to operate under a risk-based measure already exists under the Animal Products Act 1999 and the Food Act 2014. The Notice reinforces this requirement for clarity.

A registered risk-based measure could be a risk management programme (RMP) registered under the Animal Products Act 1999 or a National Programme or Food Control Plan registered under the Food Act 2014. Bee products intended for export must be processed within premises operating under a registered risk-based measure in order to be eligible for export.

Retail or direct sellers of manufacturer pre-packed honey that do not need to register a risk-based measure under the Food Act or Animal Products Act may export honey to countries that do not require an official assurance, as long as all other requirements (including transfer documentation and registration as an exporter) under the Notice are met.

6.2.2 Market eligibility depends on risk-based measure

The market eligibility of bee products depends on the risk-based measure under which the processing premises is operating. If the premises is operating under a registered RMP, the bee products will automatically be able to be considered for export eligibility to all countries.

If the premises is operating under the Food Act 2014, the bee products are NOT eligible for export to markets for which official assurances are required – such as China (excluding bee products consignments that are small parcels or packages sent directly to consumers via courier or post), European Union countries (excluding bee products consignments that are small parcels or packages sent directly to consumers via courier or post), the United Kingdom, Eurasian Economic Union countries (excluding Russia), Japan, Western Australia, Malaysia, and the United Arab Emirates. Bee products processed by premises operating under the Food Act will only be eligible for export to countries other than those listed above (i.e. countries for which official assurances are not required).

MPI understands that the market requirements were correct at the time of publication of this document. Importing market requirements change often without MPI's knowledge. Exporters are required to check OMARs to ensure there have been no changes to importing countries requirements.

6.2.3 You can register a Food Control Plan as an Intermittent RMP

The Animal Products Act 1999 provides a mechanism whereby a Food Control Plan registered under the Food Act 2014 could be recognised as an RMP. This enables premises to operate intermittently between the two risk-based measures depending on the intended destination markets for the products being processed. This could be an option for premises that primarily process bee products for the domestic market but may want to export from time to time. For further information, see section 2.5.2 of the [Risk Management Programme Manual](#).

6.3 Bee products to be sourced from listed beekeepers

6.3.1 How to become listed

Clause 3.3 of the Notice requires that beekeepers supplying bee products for export to be listed. To list as a beekeeper you need to complete the AP14 beekeeper listing application form available on the MPI website [Exporting honey and bee products](#)

6.3.2 Listing fee

The current beekeeping listing fee can be found on the [AP 14 form Beekeeper Listing](#). Fees, charges, and levies are charged under the Animal Products (Fees, Charges, and Levies) Regulations 2007.

6.3.3 Purpose of listing

The purpose of listing is to ensure that beekeepers who supply bee products into the export supply chain are subject to regulatory oversight. This facilitates the effective monitoring of compliance and implementation of enforcement measures where necessary. This also facilitates the identification of all players who handled or processed any given consignment of bee products thus providing the necessary confidence for issuing official assurance and facilitating recall actions where necessary.

Why not use the Apiary Register under the AFB PMP?

The listing requirement is separate from the Apiary Register under the AFB PMP. The Apiary Register was set up for specific biosecurity purposes under the AFB PMP whereas the listing requirement is set up for the purposes of facilitating market access and safeguarding assurances under the Animal Products Act 1999. MPI currently does not have unrestricted access to the Apiary Register.

6.3.4 Exemption for operators operating under a risk-based measure

A beekeeper is exempt from completing the AP14 listing application if that beekeeper operates under an RMP or a Food Act risk-based measure (i.e. National Programme or Food Control plan). This exemption applies to all beekeeping operations owned by the operator. For example, a business operating under an RMP may have multiple beekeepers engaging in beekeeping operations for the business. In that case, all those beekeepers are exempt from listing. However, where an employee of that business keeps bees for their own purposes separately from the business, that employee must be listed if they intend to export bee products (including honey) from their own hives.

A beekeeper is also exempt if the beekeeper has an exclusive supply contract with an RMP operator and their activities are covered by the operators RMP. In this case, the supply contract must be in written form and be readily available to the verifier of the RMP premises or to the Director-General.

6.3.5 Accessing the beekeeper list

The beekeeper list is published publicly on the MPI website: [Listed Beekeepers](#). Information published on the website may include the beekeepers name and trading name, postal or business address and relevant contact details. MPI has the discretion to withhold any of this information from the list for privacy reasons.

It is the responsibility of beekeepers to ensure that information about their listing is kept current. Beekeepers are required to inform MPI Approvals (approvals@mpi.govt.nz) of any change to their information.

6.3.6 Removal from the beekeeper list

- (4) MPI may remove a beekeeper from the beekeeper list under any of the grounds in clause 3.3.6(1). Those grounds include:
- a) 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; 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 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
 - f) the beekeeper has knowingly provided false or misleading information in a harvest declaration; or
 - g) the beekeeper is no longer involved in beekeeping business; or
 - h) the beekeeper asks to be delisted.

MPI will notify a beekeeper before removing their listing and allow the beekeeper to respond to the proposal for removal. Any feedback from the beekeeper will be considered before a final decision is made. However, where a non-compliance by a beekeeper poses a direct threat to market access, MPI may remove the beekeeper from the list without prior notification.

6.3.7 Other listings

Although not in place yet, it is possible that importing countries may set up their own registration arrangements for beekeepers, manufacturers, export stores, or exporters of bee products, and require MPI to recommend listings. Any such development will be notified in market-specific OMARs and the lists will be available on the MPI website: [Animal products country listing](#).

MPI does provide documents to assist with registration of animal products in certain importing markets. See [20/18 Registration documents: Specified markets](#) for details. It is possible that some countries will consider honey or other bee products as a food product, rather than an animal product, and require the bee product to be registered on a local database of permitted foods. Where MPI is aware of the procedure, information will be available in the OMAR for that market, but, in many instances, exporters should check with their importer or agent for specifics.

7 Guidance to Part 4: Requirements relating to traceability

7.1 Pre-processing traceability requirements

Clause 4.1 contains identification and record-keeping requirements that are largely considered as standard industry practice.

7.1.1 Marking of honey boxes (clause 4.1(1)(a))

Clause 4.1(1)(a) of the Notice requires beekeepers to mark all honey boxes presented for extraction with their allocated AFB code or an equivalent code. The purpose of this requirement is to facilitate the identification of boxes at extraction facilities, especially where extraction facilities extract bee products for multiple beekeepers. As such, the code does not have to be unique for each box as this is about differentiating honey boxes owned by different beekeepers as opposed to differentiating between honey boxes owned by the same beekeeper.

7.1.2 Record-keeping of apiary site information (clause 4.1(1)(b))

Clause 4.1(1)(b) of the Notice requires beekeepers to keep the following information for each of their apiary sites for a period of no less than 4 years:

- (1) the global positioning system (GPS) location of the apiary site; and
- (2) a unique identification code for that site; and
- (3) the number of honey supers at the site; and
- (4) the volumes or units of each bee product type harvested from that site and the date of harvest; and
- (5) 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.

A topographical map (Land Information New Zealand topographical map) with the site clearly marked is also acceptable in terms of GPS location. It is up to the beekeeper to devise a unique identification code for each of their sites (e.g. this could be a number, letter or name). Volumes or units could mean the number of supers if the weight is not apparent at that stage, as is quite often the case.

Apiary sites are not subject to routine verification for export purposes. As such, beekeepers are not verified on a regular basis for this information. However, MPI already has the power under the Animal Products Act 1999 to verify beekeepers where warranted and a verification may include a check on beekeepers' compliance with this record-keeping requirement.

7.2 Harvest declarations

7.2.1 Harvest declaration requirement already applies for official assurance purposes

The Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products requires a harvest declaration for every delivery made by beekeepers supplying bee products for export to countries for which official assurances are required.

Clause 4.2 of the Notice extends the harvest declaration requirement to beekeepers supplying bee products for export to all other markets for which official assurances are not required. So regardless of intended market, all delivery of bee products for export from apiary sites to an extractor requires a harvest declaration. The harvest declaration does not need to be uploaded to AP E-cert but it is useful from a traceability perspective if the harvest declaration is available in AP E-cert.

The harvest declaration form is available for download from the MPI website: [Harvest Declaration for Bee Products Intended for Export](#).

7.2.2 Recognition of operator systems (clause 4.2.3(2))

A beekeeper who is also an operator (i.e. operating a premises under RMP, National Programme or Food Control Plan) can have their system recognised as providing information equivalent to a harvest declaration. If the beekeeper has a system for recording all the information required in a harvest declaration in relation to

every delivery of bee products then the beekeeper is not required to fill in a harvest declaration form for every delivery of bee products from their apiary sites to their processing premises. A beekeeper relying on clause 4.2.3(2) must indicate this to their verifier and should be in a position to demonstrate the equivalence to the verifier accordingly. The required information is as specified in clause 4.2.2 of the Notice.

7.2.3 Validity of a harvest declaration (clause 4.2.4)

In order for a harvest declaration form to be valid, it has to be signed and dated by the submitting beekeeper and the receiving operator, be complete and accurate, and have a unique reference number assigned to it by the operator (i.e. the beekeeper's AFB code followed by appropriate digits). It is important that each harvest declaration is authenticated by both the supplying beekeeper and the receiving operator through their signatures. This ensures that all harvest declarations are properly attributed to identifiable individuals.

The validity of old harvest declarations submitted by beekeepers prior to the commencement of the Notice (i.e. prior to 5 February 2018) is not affected. Those harvest declarations remain valid and bee products to which they relate remain eligible for export.

Additionally, the Notice requires a harvest declaration to contain the identification code allocated by the beekeeper for their boxes.

7.3 Traceability between operators when an official assurance is required

Currently, operators who process bee products for export to countries requiring official assurances are required to raise a transfer document in AP E-cert every time they transfer a consignment to another operator, this applies to all consignments regardless of size. Therefore, the transfer document requirements in clauses 4.4 and 4.5 do not apply to them. The traceability requirements for product intended for official assurance countries are demonstrated in Figure 1.

Figure 1: Supply chain traceability for export to countries for which official assurances are required.



Figure 1 reflects an overview of the traceability requirements for bee products intended for export to countries for which official assurances are required.

- (1) Listed beekeeper completes harvest declaration once harvesting is complete and provides to the extractor.
- (2) Honey must be extracted under a risk management programme (RMP) and when ready to be stored or packaged at another premises an eligibility document (ED) or eligibility declaration (EDec) must be entered and approved in AP E-cert. Note: If stored or packaged on the same premises, it does not need a ED or EDec.
- (3) Honey and bee products recorded on one transfer document may be combined with other products. This may be repeated many times as processing continues, and the products are moved between registered premises. AP E-cert tracks the movement history of animal products as they are transferred between premises within New Zealand in order to ensure their eligibility for export to markets that require official assurances.
- (4) Once the honey/bee product is at the Premises of final control a Final ED must be raised and approved in AP E-cert. The Final ED consolidates all related EDs or EDecs into one final consignment destined for export. **For mānuka honey consignments, the ED raised by the premises of final control must contain the mānuka test results (these results may be added to an ED or Edec earlier in the transport chain). The verifier will check the test results prior to approving the Final ED.**
- (5) When the product is ready for export, the exporter (or their agent) enters the required product and consignment data into AP E-cert. This generates a request for an export certificate. Once this is approved by the MPI certification unit the honey/bee product is ready to be exported. **For mānuka honey consignments, the Exporter must attach the mānuka test results to the export**

certificate application. The MPI certifier will check the test results prior to issuing the export certificate.

- (6) Destination country officials review the export certificate as part of their border clearance processes. The officials may access AP E-cert to validate the data and confirm that a paper certificate is genuine. For some destination countries, the certificate data is sent electronically from AP E-cert directly to a database controlled by the border authority.

For more information about AP E-cert, refer to the MPI website: [Animal Products \(AP\) E-cert](#). This link contains information on who may use AP E-cert, how it works and how to apply for access.

7.4 Transfer document requirements for export without an official assurance

Operators must raise a transfer document for any consignment they transfer to another operator and make the document available to the receiving operator. Where both consignor and consignee have access to AP E-cert, the transfer document must be raised in AP E-cert (4.4.2(1)).

If any of the operators (consignor or consignee) do not have access to AP E-cert, the transfer document can be met through any of the following ways:

- (1) The operator raises a transfer document in manual form available for download from the MPI website: [Forms and templates for exporting honey and bee products](#); or
- (2) The operator has an internal documented system which records the same or better information as required under clause 4.4.1 of the Notice.

7.4.1 Operators with multiple premises may not be required to raise transfer documents

Where there are multiple premises owned or occupied by the same company or operator, the transfer of consignments between those premises does not have to be associated with a transfer document if they have a system that provides traceability equivalent to that provided by transfer documents. In assessing equivalence, the verifier may look at the level of information recorded by the system for each consignment and the clarity of the flow or connectivity of that information from one premises to another when a consignment is transferred.

7.4.2 Transfer of bee product intended for non-official assurance countries prior to 5 February 2018

Any transfer of bee product intended for non-official assurance countries prior to 5 February 2018 is not affected. In other words, the absence of a transfer document in association with any such transfer does not render the product ineligible for export.

7.5 Traceability between operators when an official assurance is not required

7.5.1 Exports weighing greater than 2kg where official assurances are not required

The operator of the final premises with a risk-based measure (including premises exempt under the Food Act as referenced in 3.2.1) is required to raise a transfer document to the exporter when the product leaves the risk based measure traceability chain (i.e. is exported). This final transfer document does not have to be raised if the operator of the final premises with a risk-based measure (premises of final control) and the exporter are the same person and equivalent traceability to transfer documents is adhered to by their internal

inventory control system. Generally, the premises of final control will belong to a courier, freight forwarder or postal service.

The traceability requirements imposed by the Notice for product intended for non-official assurance countries are demonstrated in **Figure 2** below.

Figure 2: Supply chain traceability for export where official assurances are not required for consignments over 2kg



Figure 2 reflects the minimum traceability requirements for bee products intended for export to countries for which official assurances are NOT required and the final package weighs greater 2 kg.

- (1) Listed beekeeper completes harvest declaration once harvesting is complete and provides to the extractor.
- (2) Honey must be extracted under a risk-based measure (eg. National programme, Food Control Plan, Risk management programme) and when ready to be stored or packaged at another premises a transfer document is completed (Note: If it is stored or packaged on the same premises, it does not need a transfer document). Operators' compliance with transfer document requirements will be verified during performance-based verification (where applicable).
- (3) Each time the honey/bee product moves between premises with different operators a transfer document needs to be completed until the product reaches the premises of final control. **Where mānuka honey consignments are exported to non-official assurance countries, the Notice requires operators and exporters to have the relevant test results readily available to them.** The test results do not have to be attached to the transfer documents and can be kept in a manner considered appropriate by the operator or the exporter.
- (4) The premises of final control must complete a final transfer document and provide a copy to the registered exporter when the bee product is exported.
- (5) Exporters should keep a copy of the final transfer document for a minimum of 4 years.
- (6) Bee Products arrive at the destination market and are cleared by overseas competent authorities.

Alternatively, following traceability requirements and using AP E-cert as demonstrated in **Figure 1** (although official assurances may ultimately not be required) means that operators only run a single system instead of two and ensures maximum eligibility for the product.

7.5.2 Exports weighing less than or equal to 2kg where official assurances are not required

Packages weighing less than or equal to 2 kg, when exported to a private individual without an official assurance, do not require a transfer document to be provided to the postal or courier service for the export of bee products. Transfer documents are also not required to be raised beyond this point.

It is the responsibility of the exporter to ensure the labelling requirements under Clause 4.5.3(3) are correct when handing the package to the courier or transport operator for export. The label on the outside of the package should be affixed in a way that will ensure it cannot be easily removed during normal transit; or should be written directly onto the package in non-washable/non-erasable marker.

Agents acting on behalf of an exporter must raise a transfer document to the exporter when the product is transferred to ensure they meet reporting requirements under Part 7 of the Notice. Agents acting on behalf of an exporter may include contractors, packers or stores transferring packages less than or equal to 2 kg to courier or postal services on behalf of exporters.

Figure 3: Supply chain traceability for export of Bee Products weighing less than or equal to 2 kilograms where official assurances are not required



Figure 3 reflects the traceability requirements for bee products intended for export to countries for which official assurances are NOT required and the final package weighs less than or equal to 2 kg.

- (1) Listed beekeeper completes harvest declaration once harvesting is complete and provides to the extractor.
- (2) Honey must be extracted under a risk-based measure (eg. National programme, Food Control Plan, Risk management programme) and when ready to be stored or packaged at another premises a transfer document is completed. (Note: If it is stored or packaged on the same premises, it does not need a transfer document.)
- (3) Each time the honey/bee product moves between premises with a different operator a transfer document needs to be completed. **Where mānuka honey consignments are exported to non-official assurance countries, the Notice requires operators and exporters to have the relevant test results readily available to them.** The test results do not have to be attached to the transfer documents and can be kept in a manner considered appropriate by the operator or the exporter.
- (4) The operator that transfers the small package of bee product (including honey) to the Postal/Courier Service must complete a final transfer document and provide a copy to the

registered exporter. Exporters should keep a copy of the final transfer document for a minimum of 4 years.

- (5) The operator must ensure that the Exporter ID, business address, and source transfer document number/batch number is written on the package. The operator is also responsible for ensuring the package is sent to a private individual and weighs less than or equal to 2 kilograms.
- (6) Overseas customer receives the small package of bee product.

Exporters of animal products (including bee products) are required to be registered as an exporter under Section 48 of the Animal Products Act 1999. This requirement applies to the export of all bee products, including exports without official assurances.

There is currently no legislative mechanism for exporting honey or other bee products to family members, friends or colleagues overseas without being registered as an exporter under the Animal Products Act 1999 and ensuring all requirements (traceability and otherwise) under the Notice are adhered to.

7.6 Reconciliation of traceability documents

Clause 4.6 of the Notice requires operators to maintain processes and procedures for demonstrating traceability. This requirement emphasises the need for operators to be diligent with their record-keeping responsibilities. During audits, operators are expected to demonstrate from their records the connection between the various documents (i.e. harvest declaration, transfer document) associated with a consignment.

8 Guidance to Part 5: Manuka honey

8.1 Definition of monofloral mānuka honey

Clause 5.1 of the Notice specifies the definition of monofloral mānuka honey. All four chemical attributes and the DNA attribute must be detected during laboratory tests to the specified level in order for a batch of honey to be monofloral mānuka honey.

Definition of monofloral mānuka honey

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

- ≥ 5 mg/kg 2'-methoxyacetophenone; and
- ≥ 1 mg/kg 2-methoxybenzoic acid; and
- ≥ 1 mg/kg 4-hydroxyphenyllactic acid; and
- ≥ 400 mg/kg 3-phenyllactic acid; and
- DNA from mānuka pollen ($< Cq$ 36 which is approximately 3 fg/ μ L DNA).

8.2 Definition of multifloral mānuka honey

Clause 5.2 of the Notice specifies the definition of multifloral mānuka honey. All four chemical attributes and the DNA attribute must be detected during laboratory tests to the specified level in order for a batch of honey to be multifloral mānuka honey.

Definition of multifloral mānuka honeys

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

- ≥ 1 mg/kg 2'-methoxyacetophenone; and
- ≥ 1 mg/kg 2-methoxybenzoic acid; and
- ≥ 1 mg/kg 4-hydroxyphenyllactic acid; and
- ≥ 20 mg/kg but < 400 mg/kg 3-phenyllactic acid; and
- DNA from mānuka pollen ($< Cq$ 36 which is approximately 3 fg/ μ L DNA).

8.3 Labelling of mānuka honey

- (1) The word “mānuka” cannot be used on labelling unless the definition is met
 - a) Clause 5.3 of the Notice imposes specific restrictions on the labelling of exported mānuka honey. The most important thing to remember here is that an operator or an exporter is not allowed to claim mānuka status in their honey label unless they have the test results to prove that the honey meets the definition of either monofloral or multifloral mānuka honey (as explained further below). Where mānuka honey (multifloral or monofloral) is blended with honey of other floral sources, the required test results must relate to the final blended product as opposed to the mānuka honey that was added to the blend.
- (2) Definition of ‘label’ is quite broad
 - a) Operators and exporters should be aware that the definition of the word “label” is not restricted to statements or representations attached to the honey packaging. The Notice defines the word “label” as follows:

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

Operators and exporters should be careful about how they describe or represent their honey.

- (3) Making a distinction between multifloral and monofloral mānuka honey on the label
 - a) In labelling their mānuka honey, the Notice requires the operator or exporter not to misrepresent multifloral mānuka honey as monofloral mānuka honey. The term “mānuka honey” can only be used without qualification if the honey is monofloral mānuka honey. If the honey is multifloral mānuka honey, the operator or exporter has to use qualified terms such as “multifloral mānuka honey”, “mānuka honey blend”, “mānuka honey mixed with clover honey”, “mānuka honey and clover honey”, “mānuka and clover blend” etc. Honey that meets the requirements for monofloral mānuka honey cannot be labelled or sold as multifloral mānuka honey.
- (4) Use of the word “mānuka” in trademark, registered company name and trading name
 - a) The Notice does not prohibit the continued use of trademarks or registered name of companies containing the word “mānuka” on the labels of non-mānuka honey. The Notice, however, requires operators and exporters to ensure that the appearance of the registered trademark or company legal name on the label of such honey does not imply that the honey is mānuka, or does not give consumers the impression that the honey is mānuka honey. For example, compliance with this requirement could be achieved by simply clearly stating the floral type of the honey.
 - b) The Notice does not allow the use of trading names that are not the New Zealand registered legal entity names on the labels of non-mānuka honey.
- (5) Other labelling requirements are set out in the Food Standards Code
 - a) It is important to note that clause 5.3 of the Notice runs in parallel with the labelling and information requirements of the [Food Standards Code](#). Part 1.2 of the Code specifies requirements relating to identification, warning statements, advisory statements, declarations, statement of ingredients, date marking, direction for use and storage, nutrition, health and related claims, nutrition information etc.

8.4 Export certification for mānuka honey

- (1) Export certification is generally only available for export to countries requiring official assurances
 - a) Generally, MPI only provides export certification for mānuka honey exports to countries that require official assurances. This requirement is generally specified in OMARs. Operators can search country-specific OMARs on the MPI website: [Search OMARs by country/market](#). Most OMARs are password protected because they may contain commercially sensitive information, so operators must apply to MPI for access (RMP operators and MPI-registered exporters of animal products have ready access to the passwords). Refer to the above link for more information. As stated previously, countries that require official assurances include Australia (Western Australia), China (excluding honey consignments that are small parcels or packages sent directly to consumers via courier or post), European Union countries and the United Kingdom (excluding honey consignments that are small parcels or packages sent directly to consumers via courier or post), Japan, United Arab Emirates, Korea, the Eurasian Economic Union (excluding Russia) and Malaysia.
- (2) MPI has discretion to issue export certificates where not required by importing countries

- a) MPI may exercise discretion in allowing export certificates to be issued for mānuka honey consignments exported to countries that do not require official assurances (e.g. Hong Kong, Singapore etc.) especially when that certification provides a basis for the importing market to certify the honey on to a further destination where certification is required. In order to be eligible for this, the honey is required to comply with all official assurance requirements. In this scenario, MPI issues the export certificates at the exporter's commercial risk; meaning that MPI issues the certificate in good faith that the exporter has carried out all necessary enquiries to ensure compliance with the importing market's requirements. MPI will not intervene if the consignments are refused entry.
- (3) Final operator to upload test results in the eligibility document submitted to the exporter
 - a) Where mānuka honey consignments are to be exported to countries requiring official assurances, clause 5.4 of the Notice requires the test results to be uploaded in the final eligibility document submitted in AP E-cert by the operator of the premises of final control (i.e. the operator of the last RMP premises where the consignment is held before it is transferred to the port of export).
 - b) In practice, the final premises could be a store and testing could have been done by the preceding operator (e.g. the packer). In such a case, operators may make appropriate arrangements as to who uploads the test results. The preceding operator may upload the test results if the parties agree but the ultimate legal responsibility lies with the final operator. Verification of test results will occur at the final operator stage, meaning that the final eligibility document raised by the final operator to the exporter must have the test results and the verifier will verify them at that final stage.
 - c) For detailed instructions about creating and uploading test results (use "PAC" Supporting Document type) in an eligibility document (ED), refer to *Part 20 Supporting Documents* of the E-cert Help File. Part 20 guides users (as primary operators) on how to create a supporting document, and how to enable other operators (intended operator/s) to have access to that Supporting Document when raising an ED which requires one. *Part 11 ED Submission* of the Help File explains how to prepare and submit an ED, Section 11.6 explains how to raise an ED to include a Supporting Document
 - (4) Exporter to upload test results in the export certificate application submitted to the MPI certifier
 - a) Clause 5.4 of the Notice also requires exporters to upload the relevant test results to the export certificate applications they raise in AP E-cert for mānuka honey consignments. In practice, AP E-cert has the appropriate functionality allowing the exporter to directly extract the test results from a final eligibility document that the final operator submits in AP E-cert to the exporter.
 - b) For more information on export certification/official assurances, refer to the [Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products](#).

8.5 Verification of mānuka honey claim

Generally, verification of mānuka honey claims occurs on two occasions:

- (1) during the export certification process for mānuka honey consignments to countries requiring official assurances; and
- (2) during performance-based verification (i.e. PBV audits) for all premises operating under the Animal Products Act framework (i.e. RMP premises).

In relation to (a) above, the verification will be a desktop verification of the test results uploaded in the eligibility document raised in AP E-cert by the operator of the premises of final control.

In relation to (b) above, RMP operators processing bee products are subject to a ceiling verification frequency of 1 audit every 6 months (2 per year). It is also a mandatory requirement that one of the audits occurs during the harvest season. Clause 5.6 requires the verifier to check a collection of test results relating to mānuka

honey during these audits. For more information on verification, refer to the [Animal Products Notice: Export Verification Requirements](#).

9 Guidance to Part 6: Laboratory tests for mānuka honey

9.1 Laboratory tests to be carried out by a recognised laboratory

Under the Notice, only test results obtained from recognised laboratories are valid for the purposes of the Notice. A recognised laboratory is one that is recognised by MPI to carry out regulatory testing under the Recognised Laboratory Programme. The recognised laboratory may perform one or both types of tests (chemical and/or DNA) on mānuka honey. Refer to the MPI website: [Manuka honey](#) to search for a recognised laboratory.

9.2 Subcontracting of tests by recognised laboratories

A recognised laboratory may only be able to carry out one type of the test (due to lack of recognition, resourcing, etc). If an exporter/operator engages the service of a laboratory (principal laboratory) that can only carry out one of the test types (e.g. chemical), the Notice requires the principal laboratory to arrange for the other test to be completed at a laboratory that is recognised under the Recognised Laboratory Programme for the other test (e.g. DNA). The principal laboratory will collate the results of all tests when completed and send them to the exporter/operator.

9.3 Sampling requirements

(1) Test required at batch level

- a) Sampling is required per batch. The Notice defines “batch” as follows:

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

- b) For the purposes of the Notice, a batch is the drum or tank from which honey in its final form (i.e. no further blending or processing other than packing, transport or storage in export ready form) is drawn and packed for export. For example, if multiple drums are blended together, the sample for testing has to be drawn from the blended product as opposed to each contributing drum. If honey is packed into a drum and there is no further blending, the sample for testing must be drawn from that drum. When multiple drums filled from a single homogenised tank and are exported as bulk, the sample for testing may be drawn from the tank.

(2) Batches to be homogenous

- a) Clause 6.4 of the Notice requires batches from which samples for testing are drawn to be homogenous. The term “homogenisation process” is defined in the Notice as follows:

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.

- b) In order to ensure that a batch is homogenous, the operator must mix the honey in the batch thoroughly.

- (3) Samples for testing must be representative
- a) Clause 6.4 of the Notice requires that samples are representative. The Notice defines a “representative sample” as follows:
- representative sample** is a sample which is taken from a batch and contains characteristics which accurately reflect the batch
- b) The Notice also provides the following guidance on how a representative sample may be drawn:

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 that it is representative is to carry out the following:

- a) mix the honey thoroughly to ensure uniformity of characteristics immediately before sampling; and
b) 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 is to carry out the following for all containers:

- a) mix the honey thoroughly; and
b) take proportionate quantity of honey in a separate vessel; and
c) mix the honey from the separate vessels in one container from which proportionate quantity of honey samples from different containers are taken; and
d) take final sample from the one container referred to in c) with the help of an appropriate equipment (e.g. dipper, tube, syringes).

- c) Clause 6.4 of the Notice requires operators to have an internal documented system for sampling. This system is required to record the operator’s processes and procedures in relation to the sampling and testing of mānuka honey. Verifiers check this during the 6-monthly on site performance based verification.

9.4 Interpretation of test results

Under clause 6.5 of the Notice, the operator who arranges for laboratory tests for their mānuka honey is responsible for interpreting the test results. Notably, clause 6.5 of the Notice also allows operators to have an arrangement with the recognised laboratory that carry out the tests to interpret the test results on the operator’s behalf.

10 Guidance to Part 8: Laboratory tests for mānuka honey prior to 5 February 2018

Recognised laboratories have had the capacity to carry out tests for mānuka honey since April 2017. Clause 8.2 of the Notice recognises the test results obtained by Analytica Laboratories and R J Hill Laboratories Limited prior to the commencement of the original Notice (5 February 2018). As such, operators could rely on those tests and not re-test their honey after the Notice came into force on the 5 February 2018. MPI recognises valid pre-commencement test results to support mānuka honey claims.