



New Zealand Food Safety

Haumaru Kai Aotearoa

Mānuka honey sold in New Zealand: is further regulation needed?

August 2018

Ministry for Primary Industries
Manatū Ahu Matua



The rising value of mānuka honey

- Honey prices have increased, and are continuing to increase.
- Honey labelled as mānuka generally sells for a higher price than other honey.
- Prices range for mānuka honey from \$12 to over \$140 per kilogram.



The mānuka honey science definition and the GREX

- MPI began a mānuka honey science programme in 2014.
- The result was a definition that authenticates New Zealand mānuka honey.
- All exported mānuka honey is now required to meet the mānuka honey science definition.
- Mānuka honey sold in New Zealand is not required to meet this definition.



Multifloral and monofloral New Zealand mānuka honey

- The identification criteria for mānuka honey includes a combination of four chemicals markers and a DNA marker.
- The robust scientific criteria can be used to identify and separate monofloral and multifloral New Zealand mānuka honey from other honey types.



Current consumer protections

- There are already rules that protect consumers from being misled.
- MPI and the Commerce Commission both have a role in enforcing these rules.



The opportunity for the domestic mānuka honey market

- We are testing whether changes are required to the way mānuka honey is regulated in New Zealand.
- There are three main reasons to explore this:
 - Consumer protection
 - Clarity for producers of mānuka honey
 - The risk to NZ's reputation from non-tested honey being sent offshore.



A domestic standard: applying the science definition to mānuka honey sold in New Zealand

- Any changes would use the same science definition as exported mānuka honey.
- We think any changes should:
 - give consumers clarity, but also choice;
 - give the honey industry clarity about requirements for mānuka honey; and
 - have as minimal cost as possible.



Two options for a domestic standard

Voluntary

Businesses choose whether they participate or not.

Mandatory

All businesses must meet the requirements.

Voluntary explained

- Businesses could choose to participate, so not all mānuka honey sold in New Zealand would need to meet the standard.
- Those who do participate would have to follow rules and have mānuka honey tested.
- Consumers and businesses could have certainty if they chose to.
- Still some risk to New Zealand's reputation from untested honey being sent offshore.



Mandatory explained

- All New Zealand mānuka honey sold in New Zealand would need to be tested.
- All businesses would have to follow the rules.
- Businesses and consumers would all have certainty.
- Any mānuka honey that ends up offshore would meet the science definition. This would help maintain New Zealand's reputation.

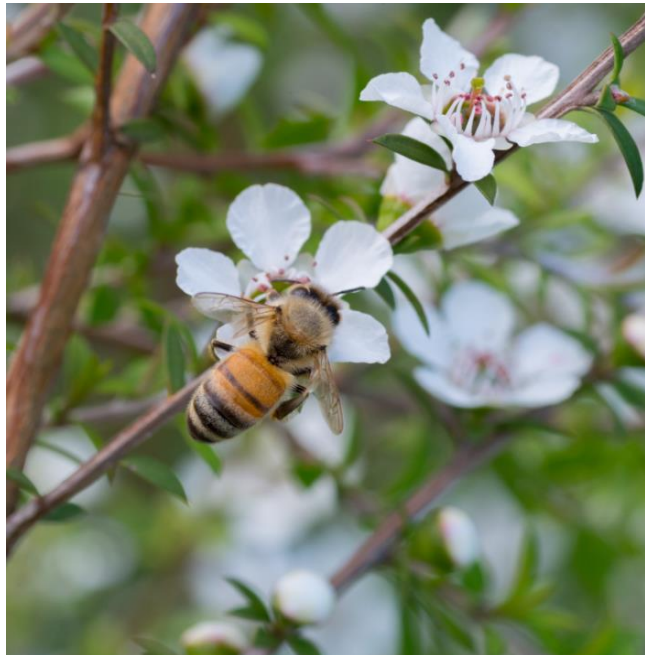


What would this mean for imports and exports?

- Mānuka honey exported from New Zealand would still need to meet the export requirements. A domestic standard would not change export requirements.
- The standard would apply to New Zealand mānuka honey. Currently, only some countries can import honey to New Zealand. These countries do not produce mānuka honey.



Rules and Requirements



- Any standard would use the same science definition as exported mānuka honey.
- The core components of the standard would be similar for both a voluntary and mandatory standard, and are consistent with the export requirements.
- The key differences:
 - who must comply; and
 - compliance and enforcement provisions.



What products does it apply to?

- Single-ingredient honey eligible for sale for human consumption.
- This would include mānuka honey in retail packs, and mānuka honey being sold to be subsequently used in another product.
- It would not apply to mānuka honey in storage until it was ready for packaging or sale as an ingredient.



Who is responsible for the testing?

- Testing would be arranged by the business that packages the New Zealand mānuka honey for retail sale or as an ingredient.
- These businesses would be responsible for making sure that the rules are followed.



What are the labelling requirements?

Voluntary

- Only participating businesses could claim their honey meets the standard.
- Non-participating businesses could still label their honey as mānuka honey

Mandatory

- Only honey that meets the standard could be labelled as New Zealand mānuka honey.
- Honey that does not meet the science definition could not be labelled as mānuka.



What are the testing requirements and costs?

- Before honey could be sold as mānuka it would need to be tested to show it meets the science definition
- This would be carried out by an MPI recognised laboratory.
- The current cost of testing is \$180-\$190 per sample.



What are the record keeping and administration requirements?

- Records and test results would be required to be kept for at least four years, and be provided within 24 hours if requested.
- Businesses would be responsible for keeping traceability information to trace:
 - the sampling and test results to each batch; and
 - the products from the batch back to the sampling and test records.



How would it be verified?

- Laboratory test results and sampling records would be verified.
- Three ways this could happen:
 1. verification at the same time as regular verification visits;
 2. separate annual verification; or
 3. verification of mānuka honey operators at least once per year.



What would compliance and enforcement be like?

Voluntary

- Enforcement would rely on contractual arrangements.
- Those who don't comply could no longer claim their honey meets the standard.

Mandatory

- Enforcement through existing provisions in food legislation.
- There could also be an infringement notice and fee for non-compliance.



What would the timing and transition periods be?

- If new rules are introduced, we suggest allowing at least six months to transition.
- Mānuka honey already packaged for sale when the requirements came in to effect could still be sold.



Key questions that we are asking

- Should the mānuka honey science definition apply to mānuka honey sold in New Zealand?
- If the mānuka honey science definition is applied mānuka honey sold in New Zealand, should it be voluntary or mandatory for mānuka honey to meet the definition?
- If mānuka honey was required to meet the definition, what do you think about the proposals for the core components?



Next steps

- Once we have received submissions we will consider all the new information and perspectives that have been provided.
- We will use this to further inform our analysis and a summary submissions will be made available.
- We will report back to Ministers, to enable them to make decisions.



Submissions close 17 September – there are 3 ways to submit:

- Submit through our website
<https://www.mpi.govt.nz/news-and-resources/consultations/manuka-honey-sold-in-new-zealand-is-further-regulation-needed>
- Email us at manuka.honey@mpi.govt.nz
- Write to us at:
Food and Regulatory Policy
Ministry for Primary Industries
PO Box 2526
Wellington 6140



Submissions are public information



Questions

