



Risk Management Proposal

Bee Products

13 March 2015

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1 Purpose

- (1) The purpose of this document is to consolidate current risk management decisions into an updated import health standard, given that documenting operational decisions has made the current import standards unwieldy.

2 Background

- (1) This risk management proposal applies to updates to the 2006 *Import Health Standard for Bee Products*, BEEPROIC.ALL <http://www.biosecurity.govt.nz/imports/animals/standards/beeproic.all.htm>
- (2) The 2003 *Import Health Standard for the Importation into New Zealand of specified bee products* (herein referred to as the 2003 IHS) allowed the importation of processed foods, medicines and other products containing honey and bee products. Honey from specified Pacific Island countries free from exotic diseases of concern was also allowed.
- (3) In December 2004, the *Import Risk Analysis for Honey Bee Products* (herein referred to as the 2004 RA) was issued. The 2004 RA recommended risk mitigation measures for American foulbrood (AFB), European foulbrood (EFB) and small hive beetle (SHB) in bee products imported into New Zealand.
- (4) The 2003 IHS was amended in 2006 in response to the 2004 RA. The 2006 IHS required a permit to import for foods or medicines containing more than 2% bee products. Permit assessment considered documentation showing adequate heat treatment for a sufficient time to reduce *Melissococcus plutonius* (the causative organism of European foulbrood) to a negligible level.
- (5) The 2006 IHS for bee products from all countries was re-issued in November 2006 (herein referred to as the 2006 IHS).
- (6) The 2006 IHS excludes imports of honey from countries other than specified Pacific Islands (Niue, Samoa, Solomon Islands, Tonga and Tuvalu). These specified Pacific Islands are free from *Melissococcus plutonius*. The 1999 IHS *Importing Honey and Propolis from Pitcairn Island* also requires a declaration of freedom from *Melissococcus plutonius*.
- (7) Over the past decade, only Niue, Pitcairn and Samoa have been able to produce a surplus of honey for export. The honey industries on these islands were set up with the help of New Zealand aid, and exports are critical to the business enterprises of beekeepers in Niue, Samoa and Pitcairn. New Zealand continues to actively support these enterprises.
- (8) As a result of the findings of the 2009 Independent Review Panel set up to address areas of scientific uncertainty, MPI is carrying out further analysis of the potential risks of imports containing Israeli acute paralysis virus (IAPV). However, for countries that are free of IAPV, this research is not relevant.
- (9) The 2015 *Draft Import Health Standard* consolidates the current bee product import standards (the 2006 IHS and the 1999 IHS for Pitcairn Island honey) to align with new standards templates and operational practises.

3 Objective

- (1) The objective of this RMP is to effectively manage biosecurity risks associated with the importation of bee products, consistent with New Zealand's domestic legislation and international obligations.

4 Recommendations for Importation of Bee Products

4.1 TREATMENT OF BEE PRODUCTS

- (1) The 2004 RA recommends risk mitigation measures for the following products, and the 2006 IHS carries this out by requiring a permit to import for these products:
 - a) Processed composite foods/food ingredients containing more than 2% honey, pollen or royal jelly that have not been baked or fried.

- b) Confectionery containing more than 2% honey, pollen or royal jelly that is not boiled.
- (2) Permit assessment has been based on documentation verifying that the product has been processed as required for the destruction of *Melissococcus plutonius*, to a level of 6D reduction, as described in the 2004 RA. The approved treatments are available for inclusion in the IHS. This is in keeping with our international trade obligations to provide clear and transparent rules for all importers.
- (3) Approved treatments for the effective removal of the risk of *Melissococcus plutonius* include:
- a) Any of the heat treatment combinations listed below in which the core temperature of the bee product has reached:
 - i. 50°C for a minimum of 54 hours
 - ii. 60°C for a minimum of 10 hours
 - iii. 65°C for a minimum of 8 hours
 - iv. 70°C for a minimum of 1 hour, 48 minutes
 - v. 80°C for a minimum of 22 minutes
 - vi. 85°C for a minimum of 11 minutes
 - vii. 90°C for a minimum of 6 minutes
 - viii. 100°C for a minimum of 5 minutes
 - ix. 110°C or more for a minimum of 1 second
- OR
- b) Gamma irradiation to 15 kGy or more (non-food items only); or
 - c) Chemical extraction processes; or
 - d) Immersion in solutions of at least 20% alcohol.

4.2 PERCENTAGE OF BEE PRODUCT IN COMPOSITE PRODUCTS

- (1) The 2006 IHS specifies that composite products containing honey, pollen or royal jelly in any concentration greater than 2% require biosecurity assessment. The 2004 RA concluded that all forms of honey are considered to be attractive to bees. The current risk management proposal is that *all* imported products containing honey, pollen and royal jelly will be required to have undergone an approved treatment prior to arrival in New Zealand.

4.3 BEESWAX

- (1) The 2004 RA concludes that beeswax is a potential risk material for *Melissococcus plutonius*. Since the 2006 IHS was issued, both the uses and forms of imported beeswax have changed significantly.
- (2) Conditions under which beeswax may be safely imported are:
- a) The product is not foundation beeswax or any other product associated with the beekeeping industry; and
 - b) The beeswax product is commercially prepared and packaged; or
 - c) The beeswax has been subjected to an approved treatment.

Blocks of beeswax from Niue, Pitcairn Island, or Samoa may be imported provided that the product is:

- d) Accompanied by a veterinary certificate issued by the Competent Authority of that country certifying that:
 - i) The beeswax comes from that country; and
 - ii) The country is free from European foulbrood caused by *Melissococcus plutonius*.

4.4 BEE POLLEN, BEE LARVAE POWDER AND ROYAL JELLY

- (1) Untreated bee pollen, bee larvae powder and royal jelly pose a non-negligible biosecurity risk. These products are imported for the purpose of manufacturing into products in New Zealand. Any possible risks from these products are mitigated by imposing the following conditions:
- a) They must be imported under a permit directing the goods to a bee-proof transitional in accordance with the [MPI Standard for Transitional Facilities](#) for Uncleared Goods, issued under section 39(1) of the Act (or any standard that replaces that standard), and any associated requirements listed in

- Annex F of the Guidance Document (or any guidance or standard that replaces that Annex) to that standard.
- b) While in the transitional facility, the facility operator must ensure that consignments of bee product risk materials are marked, stored and handled appropriately.
 - c) The bee product risk material must be processed to meet the following requirements, thereby becoming non-risk material:
 - i) The product must be encapsulated at the transitional facility listed on the permit.
 - ii) The outer layer of those capsules must not contain any substance that is attractive to bees. This includes but is not limited to sugar, fruit, honey, pollen or royal jelly.
 - iii) Encapsulated bee products must be packaged and sealed in shelf-ready packages.
- (2) The facility operator must ensure that all packaging, semi-solid and solid waste in direct contact with bee product risk materials imported into New Zealand is treated, destroyed or disposed of by:
- a) Incineration; or
 - b) Autoclaving (at least 101° for at least 5 minutes); or
 - c) Deep burial.
- (3) Transfer of bee product risk materials from a transitional facility for offsite testing or sale must be authorised by an MPI Inspector.

4.5 PROPOLIS AND VENOM

- (1) The 2004 RA concludes that bee propolis and bee venom are not attractive to bees and they do not harbour bacteria, small hive beetle or exotic varroa species. Therefore, propolis and venom are not considered risk goods and are not subject to the same sanitary measures as other bee product imports.
- (2) Propolis and bee venom that have not been subjected to an approved treatment and are imported in non-shelf ready form could potentially carry contamination from beekeeping facilities. Therefore, MPI will continue to require proof of approved treatment for propolis and venom imports that are not in shelf-ready packaging.

4.6 CRITERIA FOR APPROVAL OF PACIFIC ISLANDS FOR EXPORTING HONEY TO NEW ZEALAND

- (1) Honey and other bee products from approved Pacific Islands are eligible for import under the 2006 IHS with appropriate veterinary certification. Current certification requirements from the Competent Authority of each island states that:
 - a) The honey originates from that island.
 - b) The island is free of *Melissococcus plutonius*, the causative agent in European foulbrood
- (2) The process in place for New Zealand to approve Pacific Islands as eligible to export honey and bee products to New Zealand is as follows:
 - a) The Competent Authority meets the following criteria:
 - i) A Competent Authority for border control and national biosecurity in the apiculture sector is recognised.
 - ii) Diseases of concern (EFB, AFB, SHB and IAPV) are officially notifiable or there is a statutory obligation to report the first occurrence to the Competent Authority.
 - iii) The Competent Authority has a mechanism to register and manage the apiculture industry, such as an obligation to register beekeepers, apiaries or hives, with reasonable compliance.
 - iv) Officials of the Competent Authority have the power to inspect, sample and test, and order controls including destruction of hives.
 - v) The Competent Authority has systems to ensure the integrity of official assurances issued in support of exports of bee products.
 - b) Controls on risk pathways for the possible entry of bee diseases are demonstrated by the following:

- i) Statutory mechanisms to restrict import pathways are in place, and the Competent Authority exerts effective management of risks to bee health.
 - ii) Legal imports of live honey bees, beekeeping equipment and apiculture products are subjected to controls to manage risks of introducing bee diseases.
 - iii) Pathways by which illegal imports may occur are identified and controlled.
- c) The health status of bees is demonstrated by the following:
- i) The Competent Authority has the ability to provide assurances of the health status of the country for the diseases of concern.
 - ii) Officials of the Competent Authority and beekeepers are trained in the clinical signs associated with the diseases of concern and how to officially report suspicion.
 - iii) The Competent Authority has access to investigation and diagnostic resources to undertake investigations and rule in/out diseases of concern when suspect cases are reported.
 - iv) Regular surveillance is undertaken to provide an assurance of claims for freedom from honey bee diseases of concern. The assurance provided is equivalent to that achieved by New Zealand, as determined by taking into account frequency, methods, sampling rate, the population at risk, likely exposure pathways, and any other epidemiologically relevant factors (such as varroa mites or other viral vectors).
- (3) It is recommended that the veterinary certificate for Niue, Pitcairn Island and Samoa be amended to recognise the following:
- a) The country is approved for export of honey to New Zealand.
 - b) The country is free from SHB and IAPV (in addition to EFB).
 - c) The country is free from AFB or has an approved AFB control programme.

4.7 INCLUSION OF PITCAIRN ISLAND

- (1) MPI also maintains the 1999 IHS *Importing Honey and Propolis from Pitcairn Island*, BEEPROIC.PIT. The Pitcairn Island standard also requires certification that the honey originates from that country, and that the country is free from *Melisococcus plutonius*.
- (2) This proposal is that Pitcairn Island is added to the current standard, aligning the process for approval of Pacific Island countries for export of honey and beeswax to New Zealand.

5 Recommendations for Identified Risk Organisms

It is recommended that the operational changes noted above be incorporated into the import health standard BEEPROIC.ALL