



Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

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

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

Consultation closes on **23 May 2017**.

How to have your say

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

Please include the following information in your submission:

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

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

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

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

The following points may be of assistance in preparing comments:

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

Submissions are public information

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Any decision to withhold information requested under the Official Information Act 1982 may be reviewed by the Ombudsman.

For more information please visit <http://www.ombudsman.parliament.nz/resources-and-publications/guides/official-information-legislation-guides>

Your details

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

General questions: getting to know you

1. What part of the supply chain do you operate in:
 - beekeeper
 - extractor
 - processor
 - packer
 - exporter
 - retailer of bee products
 - other – please specify

2. How long have you been involved in the apiculture industry:
 - 0-5 years
 - 5-10 years
 - 10 + years
 - not applicable

3. Do you operate under:
 - an RMP under the Animal Products Act 1999
 - the Food Act 2014 (Food Control Plan or National Programme)
 - the Food Hygiene Regulations
 - none of these
 - not applicable

4. If you are a beekeeper, how many hives do you currently have:
 - 0 – 5
 - 6 – 50
 - 51 – 500
 - 501 – 1000
 - 1001 to 3000
 - More than 3000

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

Marlborough, New Zealand

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

- 0
- 1 – 5
- 6 – 19
- 20 or more

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

- beekeepers
- processors
- packers
- other – please specify

Impact of compliance costs for beekeepers, processors and exporters

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

The proposal to have each super uniquely identified is neither practical nor relative to enabling effective tracing. The information gathered doing this is no different to the information already gathered when filling in the existing harvest declaration.

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

every beekeeper with ~~the~~ more than 3 hives will be affected as it is a ridiculously time consuming task to try and keep every box going back to the same hive with the same frames in it.

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

yes it will cost more. to put a number on it would be guess work. And who is to say if you do put this silly measures in place I 5 years you could be adding a whole new lot of silly rules.

No additional substances to be present in New Zealand honey

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

I agree because:

If your not being greedy when Harvesting honey there is no need to ever feed bees.

I disagree because:

Why should it matter if the beekeeper chooses to do this? If additional ~~sugars~~ sugars are found it is at his own risk to force beekeepers to not have feeders "on the hive" dont stop additional sugars being in the honey.

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

more enforcement needs to be put on the cowboys who are caught with honey samples that have these things present in honey. having honest beekeepers jump through more hoops to satisfy your box ticking rules is not going to stop this.

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

I agree because:

I disagree because:

you are mad to think you can trace every frame let alone what kind of box it has been. in!! you are clearly not looking at the practicality of this industry

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

at present the varroacide strips are taken out at the start of the honey flow. So the amount of residue would not change even if the frames from the brood nest are put into supers. even if it did, an outside frame in the brood box could be harvested by a beekeeper who is greedy enough

Processors of bee products to operate under a risk based measure

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

I agree because:

I disagree because:

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

Bee products to be sourced from listed beekeepers

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

I agree because:

The requirements are no more than what the ~~AFBMA~~ already have from every beekeeper.
AFBPM

I disagree because:

what you are asking is to re-submit this same information that you could easily gain by working with the ~~AFBMA~~ AFBPM & save a lot of time and money on both sides of the fence.

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

the traceability is fine. The \$178 a year is not! who can justify the cost of this fee when the Director general only has to fill in the information once. ~~the rest~~ of every year after that all he has to do is re-submit the same details

Pre-processing traceability requirements

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

I agree because:

keeping of records is fine

I disagree because:

The extra records don't change the amount of traceability. they only increase the work load of the beekeeper to further complicate the work done in the field & in the yard.

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

you already have enough traceability. Any more and you would be asking how old each bee is that regurgitates the nectar into honey!

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

you would be forcing the Majority of beekeepers in this country to completely overhaul there existing process of what to do with there supers after the honey is extracted. the cost of trying to return every frame to its original super is not possible to quantify; for myself, the supers that get extracted if a frame becomes unusable I need to replace that frame with a fully drawn out frame from a different box. how can I do that now?

Traceability from beekeepers to operators – harvest declarations

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

I agree because:

all these requirements are reasonable

I disagree because:

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

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

I agree because:

all this information is reasonable

I disagree because:

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

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

I agree because:

Should be for ~~national~~ wide export to any country

I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

I agree because:

If this is the best science we can use to identify Mānuka honey. Then it should be used.

I disagree because:

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

Stopping homogenisation of honey... but then every ~~bat~~ drum of honey will be different. Then every jar will be different. Then the market won't cope.

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

I agree because:

I disagree because:

I have concerns because:

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

I agree because:

There needs to be unification across the board.

I disagree because:

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

I agree because:

I disagree because:

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

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

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

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

I agree because:

If this is the most sure fire way to identify the sought after honey then yes.

I disagree because:

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

Do you have any suggestions for minimising any impacts?

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

I agree because:

should be enough time

I disagree and propose an alternative timeframe:

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

I agree because:

I disagree because:

Any other feedback

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



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

1. What part of the supply chain do you operate in:
 - beekeeper
 - extractor
 - processor
 - packer
 - exporter
 - retailer of bee products
 - other – please specify

2. How long have you been involved in the apiculture industry:
 - 0-5 years
 - 5-10 years
 - 10 + years
 - not applicable

3. Do you operate under:
 - an RMP under the Animal Products Act 1999
 - the Food Act 2014 (Food Control Plan or National Programme)
 - the Food Hygiene Regulations
 - none of these
 - not applicable

4. If you are a beekeeper, how many hives do you currently have:
 - 0 – 5
 - 6 – 50
 - 51 – 500
 - 501 – 1000
 - 1001 to 3000
 - More than 3000

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

MARLBOROUGH

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

0

1 – 5

6 – 19

20 or more

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

beekeepers *one*

processors

packers

other – please specify

Impact of compliance costs for beekeepers, processors and exporters

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

*4.1(1) a,b,c are unwashable & totally impracticable.
The proposals regarding traceability would have a significant time & labour cost whilst achieving nothing of value to the business or information that could be of use or guaranteed trace back to MPI.
4.1c i. we already do and provide to Assure Quality annually.*

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

PART 4.3.1. - The law already states that honey may not have sugar or additives added to it if being sold as honey. Testing of product at end of packaging process is the only way to ensure it is fit for purpose. If not, trace back from there is a fairly simple process.

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

Undoubtedly - unsure.

No additional substances to be present in New Zealand honey

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

I agree because:

This is already standard and has been common practice for ever. To deliberately feed bees & then sell stored syrup as honey is already illegal. ~~as per my knowledge~~ & tested for if the producer has any concerns.

I disagree because:

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

Status Quo & end product testing which MPI says it does very little of. More evidence of a problem before lumping us with additional costs & burdens we deem unnecessary would be appreciated.

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

I agree because:

I disagree because:

Has this problem been properly investigated. Are the inferred contamination levels above allowed limits & was the contamination caused by brood frames being extracted. Most contamination is in the wax not the honey

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

Good filtration & removal of all wax particles.
Good rotation of brood frames - done for general hygiene also.
Frames that have had a season of brood through them hold together much better than straight foundation especially when extracting combs.

Processors of bee products to operate under a risk based measure

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

I agree because:

I disagree because:

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

Bee products to be sourced from listed beekeepers

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

I agree because:

Simplifies the system.

I disagree because:

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

Pre-processing traceability requirements

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

I agree because:

I disagree because:

Our current advisory diaries/ logs are sufficient. All the info you require is on the ^{harvest} Dec. To individually number each super is a complete waste of time & achieves nothing. It will be extremely hard to keep track of and will be widely ignored. Just not practical in a commercial beekeeping operation. Do all hives also have to be numbered individually as well?

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

current
No gaps to be filled its on the Harvest Dec. Your proposed harvest dec requires no Apiary Registration numbers to be recorded, unless that is what is meant by 2(c). That's the vital link to where the honey has been collected from.

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

Severe aggravation, with a poor chance of being able to satisfy an MPI audit team.

Traceability from beekeepers to operators – harvest declarations

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

I agree because:

Standardises the system for all at no cost.

I disagree because:

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

Only on a very small scale. Less than ten hives.

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

I agree because:

The current Harvest Declaration form is simple & easy to fill out, at no cost. A good addition to beekeepers records (is a legal document?) section 127 Animals Product Act 1999.

I disagree because:

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

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

I agree because:

I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

I agree because:

I disagree because:

Still uncertain of the science, and not had enough old samples tested to make a comparison.

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

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

I agree because:

I disagree because:

I have concerns because:

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

I agree because:

I disagree because:

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

I agree because:

I disagree because:

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

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

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

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

I agree because:

I disagree because:

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

Do you have any suggestions for minimising any impacts?

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

I agree because:

I disagree and propose an alternative timeframe:

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

I agree because:

I disagree because:

Any other feedback

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

Maintain the Status Quo on what is required on the Harvest Declaration form but ensure everybody fills it out.

[Not relevant to request]

From: s 9(2)(a) .com>
Sent: Wednesday, 24 May 2017 6:20 a.m.
To: Manuka Honey
Subject: Re: MPI Manuka Honey Science Programme Data

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks will have a look but am happy with what's done so far -except- the mono and multi - should only be mono - we don't have mono and multi category for rewarewa or any other honey - shouldn't for manuka either

Sent from my iPhone

On 23/05/2017, at 3:12 PM, Manuka Honey <Manuka.Honey@mpi.govt.nz> wrote:

Hello,

Please find attached the raw data that was produced during the MPI mānuka honey science programme and used to inform the proposed identification criteria for monofloral and multifloral mānuka honey from New Zealand.

The attached excel file provides an explanation of the tests that were carried out on the samples, information about the samples and the results of the tests. These include information on:

- 2014/2015 nectar sample descriptions and chemical test results
- 2015/2016 nectar sample descriptions and chemical test results
- 2014/2015 honey sample descriptions and chemical and DNA test results
- 2015/2016 honey sample descriptions and chemical and DNA test results
- Archive honey sample descriptions and chemical and DNA test results
- Overseas honey sample descriptions and chemical and DNA test results
- Stability test results

To protect the confidentiality of honey suppliers and land owners, MPI has removed information that identifies the specific geographic location of the plant or honey sample. Instead samples from the same region in New Zealand have been coded using numbers 1 through 12.

You will also note that the number of attributes tested are different between collection years. This is because MPI used the data and analysis from 2014/2015 nectar and honey samples to determine which attributes would be further evaluated.

MPI is sharing this data with you to assist you in understanding the foundations of the MPI science programme. MPI does not give permission for recipients of this data to publish it in any form or to use it for the purposes of publication without express permission from MPI.

Kind regards,
MPI Mānuka Honey Team

This email message and any attachment(s) is intended solely for the addressee(s) named above. The information it contains may be classified and may be legally privileged. Unauthorised use of the message, or the information it contains, may be unlawful. If you have received this message by mistake please call the sender immediately on 64 4 8940100 or notify us by return email and erase the original message and attachments. Thank you.

s 9(2)(a)

From: s 9(2)(a) [redacted].co.nz>
Sent: Tuesday, 23 May 2017 9:22 p.m.
To: Manuka Honey
Subject: Proposed general export requirements for bee product

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

New Zealand producers will have these new standards imposed to make sure we have a set standard for Manuka (which I think is great) but any honey packed outside can be classed as manuka without these standards! This makes a joke of the whole system then as we will be competing on a completely uneven playing field (with our own product!)?

The regulations are supposed to be tidying up the industry (which is a good thing) but as far as I am aware all the manuka honey that has been tested in the U.K. and failed has actually been packed outside of New Zealand- does this not show that these new tests are actually not addressing the problem? s 9(2)(b)(ii) [redacted]

Therefore the standards are only half of the issue - for them to actually make any difference we also need to make sure that if a honey is to be called manuka it must be packed to these standards in New Zealand. Without this restriction the standards are not doing anything apart from making it a double standard industry which New Zealand companies are severely disadvantaged.

Already "Australian manuka honey" claims health and active properties that we are not allowed to claim...

Kind regards

s 9(2)(a) [redacted]

Released Under the Official Information Act 1982



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For all exporters of bee products from New Zealand

SUBMISSION FORM

Electronic Delivery by 23 May 2017 to manuka.honey@mpi.govt.nz

Submitter Details

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

General Information

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

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

s 9(2)(a) is a 10 year old Beekeeping business operating 3000 Beehives. We produce 40 to 70 tonne of Manuka honey annually and operate our own honey extraction plant. Additionally, we own land for the purpose of manuka production.

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

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

3. Do you operate under:

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

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

3000

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

§ 9(2)(b)(ii) is a family owned operation and Honey Extraction plant located at
 § 9(2)(b)(ii) 70% of our Manuka production is derived from the from the Central
 Plateau region while 30% comes from the North Islands West Coast / Port Waikato area.
 § 9(2)(b)(ii) also owns a § 9(2)(b)(ii)
 which consistently produces high quality manuka honey.

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

- 0
- 1 – 5
- 6 – 19
- 20 or more

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

- beekeepers
- processors
- packers
- other – please specify

Impact of compliance costs for beekeepers, processors and exporters

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

Costs:

The MPI proposals will involve additional & unnecessary costs to our business. The cost of the additional MPI 4 chemical marker (\$66.50) & DNA (\$66.50) testing will be additional to the 3 in 1 (\$28) & Leptosperin (\$22) tests we currently undertake for the UMFHA in order to determine the UMF quality mark. The UMFHA's 3 in 1 chemical marker test (DHA, MGO & HMF) not only grades the honey on an internationally trusted UMF test, but also validates it as Manuka through Leptosperin testing. The MPI recommended proposal to conduct DNA testing is which is unreliable & unproven (refer below & attached test results) will cost

Overall Impact of Proposals:

Overall, the intent of the MPI '**Manuka Definition**' initiative has merit for the for the industry in respect to tightening the regulatory framework around traceability and food safety and minimising the ability of operators to exploit the current loopholes

However, we oppose the methodology of science testing that underpins the '**Manuka Definition**'. We have first-hand evidence to prove that the DNA testing is not robust, is inconsistent between Laboratories (refer attached DNA test results from same batch's from two independent Laboratories)

The attached DNA test reports from s 9(2)(b)(ii) demonstrates that the DNA testing is unreliable.

- 1) The preliminary DNA testing conducted by s 9(2)(b)(ii) shows that five (5) of the twelve (12) batch's failed the DNA test.

NOTE: All five failed batch's that failed the DNA test were 14+ & 15+ UMF (refer 3 in 1 test results attached)

- 2) When all five (5) failed batch's were tested by s 9(2)(b)(ii), all five (5) passed the DNA test by seven (7) Cq points or more!
- 3) Upon s 9(2)(b)(ii) re-testing the five (5) failed batch's, two (2) batch's still failed but three (3) passed the DNA test

These inconsistencies in testing will cause irreversible harm to New Zealand's premium brand.....MANUKA HONEY!

We, like many other Manuka honey producers would need to consider selling our bulk manuka honey to offshore packing and labelling facilities if the unproven & unreliable DNA testing proceeds. This will sadly undermine New Zealand's Manuka Honey industry.

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

All of the proposals will affect our business, either directly or indirectly.

s 9(2)(a) already tests our honey to the highest of standards due to the requirements of the highly regulated Chinese market. We support lifting the overall performance of the sector in relation to traceability but the testing must be robust. The introduction of DNA testing is not robust.

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

There are several additional costs that need to be considered.

1) Time cost

The additional time cost for Beekeepers during the busiest time of the honey production cycle will be increased significantly.

2) Bulk Honey

There will be significant volume of bulk product inventory that will be sitting in storage before the cut-off date and may remain in the system for up to 3 years. Existing inventory can be tested for its authenticity against the manuka definition but it will not be able to comply with the criteria around production reporting and traceability.

MPI should delay the introduction of the requirements by 12 months.

No additional substances to be present in New Zealand honey

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

I agree because:

We do not support the practice of introducing additional substances or contaminants to NZ honey. However there are regulatory matters that need to be addressed by MPI.

1. *C4 Sugar Test*

Honey that has elevated C4 sugar levels is not acceptable under the Codex nor certain OMARs. However, there is little confidence in the measure of C4 sugars in Manuka honey. The industry urgently needs scientifically credible and reliable measures that establish adulteration.

2. *Bee Survival and Health*

Sugar feeding would only occur in a poor nectar producing season & the beekeeper would need to decide to act in the best interest of Bee survival. Feeding sugar syrup to bees should only be done as a last resort and in favour of Bee health over and above the business of honey production. Honey from hives that have been fed sugar should not be extracted but used as winter bee feed.

I disagree because:

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

MPI needs to engage in a process to review, evaluate and, if necessary, develop new tests to support purity of honey.

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

I agree because:

This is supported in order to reduce the risk of contamination of honey.

I disagree because:

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

Processors of bee products to operate under a risk based measure

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

I agree because:

The initiative to bring all processors up to a standard reflecting appropriate risk-based measures is supported. We strongly advocate that the criteria should apply to ALL bee products.

From a food safety and traceability perspective there should be no differentiation in the requirement to comply with the requirements for New Zealand consumers v International consumers

MPI should seek to apply the same compliance rules for the entire industry.

I disagree because:

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

Bee products to be sourced from listed beekeepers

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

I agree because:

s 9(2)(a) agrees that the listing requirements should be extended to all beekeepers exporting bee products to any country.

While it is noted that the GREX relates only to export products, MPI should implement a strategy to mesh the requirements relating to beekeepers to ensure a coherent and consistent national framework.

I disagree because:

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

Pre-processing traceability requirements

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

I agree because:

I disagree because:

The Harvest Declaration encompasses all the compliance and traceability information necessary without adding a further burden to Beekeepers during the busiest time of the Beekeeping cycle. The current verification audits conducted by MPI are robust & specific.

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

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

A standard template might be useful to enable easy comparison across products and producers. Verification and enforcement is critical to the ongoing credibility of the compliance standards.

Traceability from beekeepers to operators – harvest declarations

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

I agree because:

Harvest declarations are an important part of export traceability. Refer 14 above.

I disagree because:

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

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

I agree because:

Not a problem if the costs are not 'onerous'.

I disagree because:

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

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

I agree because:

Traceability of export products is supported. The system should apply equally to all.

I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

I agree because:

Generally, agree with the Chemical marker approach as the definition is based on robust science and testing.

We do not support the DNA testing as it is unproven, inconsistent and unreliable. (Refer attached Laboratory tests)

I disagree because:

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

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

I agree because:

I disagree because:

If MPI implement the DNA testing our true to label 15+ Masnuka honey will be rejected despite this premium manuka honey meeting the Chemical marker criteria.

I have concerns because:

MPI's propose Manuka definition will in fact provide a greater incentive of blending non Manuka varieties to give Manuka at low grade. Manuka honey will become just another commodity grade honey

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

I agree because:

For MPI to take away the industry rights to using the word "mānuka" on independent honey labels is wrong. If MPI were to implement this strategy they will face significant surveillance and compliance costs.

I disagree because:

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

I agree because:

I disagree because:

This will mean that there will continue to be alternative industry grading systems set up in competition with each other and based on existing or new criteria, which will confuse the consumer.

This is not consistent with the objectives sought to be achieved by MPI more generally (not just the GREX).

For any grading system to have market credibility and confidence there needs to be

- Scientific basis
- Criteria that reflect attributes desired in the market
- Independent verification
- Transparency

It is considered that for a unique to NZ product there should be a single trustworthy grading system available to everyone in the industry and backed by an appropriate regulatory framework.

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

There is the potential to mislead consumers that the chemical markers used in the MPI definition will be linked to "purity of Manuka", which will have an effect of further confusing the consumer.

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

In the interests of open and robust scientific integrity the results of the science should be available to other scientists, rather than just a sanitised summary. The science is far from resolved and it is appropriate that a collaborative and open approach be adopted.

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

Laboratory Tests

26. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

I agree because:

I disagree because:

Delete the DNA test for the reasons set out above.

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

Cost of Testing

Our estimate is that additional testing will cost § 9(2)(b)(ii) per annum.

Do you have any suggestions for minimising any impacts?

Remove DNA testing, stick to the DHA, MGO, HMF & Leptosperin testing

Transitional provisions

28. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

I agree because:

I disagree and propose an alternative timeframe:

Six weeks is not enough time for compliance change over. Six months would be more appropriate

29. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

I agree because:

I disagree because:

Six months is not enough time to shift old stock. 12 months is more realistic.

It would not be an issue if the DNA test errors are dealt with, and the high end UMF honey is considered to be Manuka, as we know it to be.

Any other feedback

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

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ANALYSIS REPORT

Page 1 of 2

Client:	s 9(2)(b)(ii)	Lab No:	1778468	SPv1
Contact:		Date Received:	19-May-2017	
		Date Reported:	24-May-2017	
		Quote No:		
		Order No:		
		Client Reference:	s 9(2)(b)(ii)	
		Submitted By:		

Sample Type: Honey

Sample Name:	15:3	15:4	15:5	15:6	15:7	
Lab Number:	1778468.1	1778468.2	1778468.3	1778468.4	1778468.5	
MPI 5 Attributes Tests						
MPI Manuka Honey Classification	Monofloral Manuka Honey					
Manuka Honey Chemistry Profile						
3-Phenyllactic acid	mg/kg	750	640	630	510	990
2'-Methoxyacetophenone	mg/kg	13.1	12.5	13.1	13.8	10.1
2-Methoxybenzoic Acid	mg/kg	9.7	9.3	9.6	10.7	7.5
4-Hydroxyphenyllactic acid	mg/kg	4.2	3.8	3.8	3.8	3.8
Manuka Honey PCR Profile						
Manuka Cq	Cq	28.61 #1	27.64 #2	27.65 #2	27.24 #2	28.60 #2
Manuka DNA	pg/µL	0.216 #1	0.4039 #2	0.4023 #2	0.5240 #2	0.2178 #2

Analyst's Comments

#1 Report Signatory for this analysis is s 9(2)(a)

Note: PCR inhibition was observed in the original honey pollen DNA sample assay. Sample dilution was carried out and result has been adjusted accordingly. This test result is equivalent to that for the unmodified test

#2 Report Signatory for this analysis is s 9(2)(a)

SUMMARY OF METHODS

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively clean matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis.

Test	Method Description	Default Detection Limit	Sample No
Sample Type: Honey			
MPI 5 Attributes Tests			
MPI Manuka Honey Classification	Evaluation of result against Ministry of Primary Industries (MPI) guideline criteria for monofloral and multifloral manuka honey. s 9(2)(b)(ii) is certified under the MPI Recognised Laboratory Programme to perform manuka honey classification testing. Ministry for Primary Industries Science Summary Report, Criteria for Identifying Manuka Honey, April 2017.	-	1-5
Manuka Honey Chemistry Profile			
3-Phenyllactic acid	Aqueous solvent extraction, dilution. LC-MSMS analysis. RLP Official Test 10.05.	10 mg/kg	1-5
2'-Methoxyacetophenone	Aqueous solvent extraction, dilution. LC-MSMS analysis. RLP Official Test 10.05.	1.0 mg/kg	1-5
2-Methoxybenzoic Acid	Aqueous solvent extraction, dilution. LC-MSMS analysis. RLP Official Test 10.05.	1.0 mg/kg	1-5
4-Hydroxyphenyllactic acid	Aqueous solvent extraction, dilution. LC-MSMS analysis. RLP Official Test 10.05.	1.0 mg/kg	1-5
Manuka Honey PCR Profile			
Manuka Cq	Quantification of Manuka DNA by real time PCR. Subcontracted to s 9(2)(b)(ii) - Microbiology; 1 Clow Place, Hamilton. RLP Official Test 10.04.	1.00 Cq	1-5

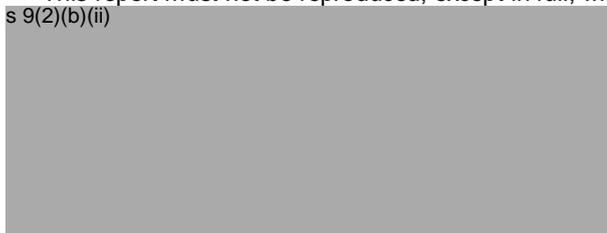
Sample Type: Honey			
Test	Method Description	Default Detection Limit	Sample No
Manuka DNA	Quantification of Manuka DNA by real time PCR. Subcontracted to s 9(2)(b)(ii) - Microbiology; 1 Clow Place, Hamilton. RLP Official Test 10.04.	0.0032 pg/ μ L	1-5

These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Samples are held at the laboratory after reporting for a length of time depending on the preservation used and the stability of the analytes being tested. Once the storage period is completed the samples are discarded unless otherwise advised by the client.

This report must not be reproduced, except in full, without the written consent of the signatory.

s 9(2)(b)(ii)



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Certificate of Analysis

s 9(2)(b)(ii)

Lab Reference: 17-12054
Submitted by: s 9(2)(b)(ii)
Date Received: 17/05/2017
Date Completed: 19/05/2017
Order Number:
Reference: s 9(2)(b)(ii)

Report Comments

Samples were received by s 9(2)(b)(ii) in acceptable condition unless otherwise noted on this report.

Results Summary

Manuka Pollen DNA*

Laboratory ID	Sample ID	Manuka Pollen DNA
	<i>Units Reporting Limit</i>	Cq
17-12054-1	15:3	[ND]
17-12054-2	15:4	[ND]
17-12054-3	15:5	34.53
17-12054-4	15:6	33.30
17-12054-5	15:7	32.04

Manuka Pollen DNA* Approver:

s 9(2)(b)(ii)

Method Summary

Manuka Pollen DNA

Samples were analysed as received by the Laboratory for Manuka Pollen DNA by pollen DNA extraction followed by qPCR.

The DNA component of the MPI Manuka Honey Definition requires a Cq value of less than 36 to qualify for either a monofloral or multifloral Manuka honey.

Certificate of Analysis

s 9(2)(b)(ii)

Lab Reference: 17-10678
 Submitted by: s 9(2)(b)(ii)
 Date Received: 2/05/2017
 Date Completed: 16/05/2017
 Order Number:
 Reference: s 9(2)(b)(ii)

Report Comments

Samples were received by s 9(2)(b)(ii) in acceptable condition unless otherwise noted on this report.

Results Summary

Manuka Pollen DNA*

Laboratory ID	Sample ID	Manuka Pollen DNA
	<i>Units Reporting Limit</i>	Cq
17-10678-1	15:3	[ND]
17-10678-2	15:4	[ND]
17-10678-3	15:5	[ND]
17-10678-4	15:6	[ND]
17-10678-5	15:7	[ND]
17-10678-6	15:8	30.41
17-10678-7	15:9	31.32
17-10678-8	15:11	32.83
17-10678-9	15:13	31.88
17-10678-10	15:14	30.75
17-10678-11	15:16	32.10
17-10678-12	15:17	31.35

Manuka Pollen DNA* Approver:

s 9(2)(b)(ii)

Method Summary

Manuka Pollen DNA

Samples were analysed as received by the Laboratory for Manuka Pollen DNA by pollen DNA extraction followed by qPCR.

The DNA component of the MPI Manuka Honey Definition requires a Cq value of less than 36 to qualify for either a monofloral or multifloral Manuka honey.

Certificate of Analysis

s 9(2)(b)(ii)

Lab Reference: 17-10678
 Submitted by: s 9(2)(b)(ii)
 Date Received: 2/05/2017
 Date Completed:
 Order Number:
 Reference: s 9(2)(b)(ii)

Report Comments

Samples were received by s 9(2)(b)(ii) in acceptable condition unless otherwise noted on this report.

Results Summary

3in1 Honey Analysis

Laboratory ID	Sample ID	Dihydroxyacetone DHA	Methylglyoxal MG	Non-peroxide Activity NPA*	Hydroxymethylfurfural HMF
	<i>Units Reporting Limit</i>	mg/kg 10	mg/kg 4	%w/v phenol eq. 0.8	mg/kg 1
17-10678-1	15:3	723	546	15.5	20
17-10678-2	15:4	604	453	13.9	23
17-10678-3	15:5	819	549	15.6	22
17-10678-4	15:6	994	525	15.2	17
17-10678-5	15:7	854	440	13.6	20
17-10678-6	15:8	418	413	13.1	8
17-10678-7	15:9	484	368	12.2	10
17-10678-8	15:11	432	410	13.1	13
17-10678-9	15:13	548	398	12.8	16
17-10678-10	15:14	861	582	16.2	11
17-10678-11	15:16	658	477	14.3	16
17-10678-12	15:17	924	625	16.9	12

3in1 Honey Analysis Approver:

s 9(2)(b)(ii)

Method Summary

3in1

Determination of Dihydroxyacetone (DHA), Methylglyoxal (MG) and Hydroxymethylfurfural (HMF) by aqueous extraction, derivatisation, and UPLC analysis.

Method Summary

NPA

Non-Peroxide Activity (NPA) values are not directly measured by the laboratory, but are calculated from the measured methylglyoxal concentration in the honey according to the requirements of the client. The calculation is based on published data^(†) comparing the NPA and methylglyoxal concentration measured in a range of honey samples. These calculated values are not accredited by IANZ and do not imply that the honey is or is not manuka honey. NPA values less than 5 are an estimate based on extrapolation of the relationship between methylglyoxal and NPA

(†) Isolation by HPLC and characterisation of the bioactive fraction of New Zealand manuka (Leptospermum scoparium) honey. C. J. Adams, et al. Carbohydrate Research 343 (2008) 651-659. And, Corrigendum to "Isolation by HPLC and characterization of the bioactive fraction of New Zealand manuka (Leptospermum scoparium) honey" [Carbohydr. Res. 343 (2008) 651]. Carbohydrate Research 344 (2009) 2609. C. J. Adams, et al.

Manuka Markers

Solvent extraction, LC-MS/MS analysis.

s 9(2)(b)(ii) has interim approval from the New Zealand Ministry of Primary Industries to conduct this analysis under the Recognised Laboratory Programme (RLP).

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Proposed General Export Requirements for Bee Products

For all exporters of bee products from New Zealand

SUBMISSION FORM

Consultation document 2017

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

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

Consultation closes on **23 May 2017**.

How to have your say

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

Please include the following information in your submission:

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

your contact details (such as phone number, address, and email).

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

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

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

The following points may be of assistance in preparing comments:

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

Submissions are public information

Everyone has the right to request information held by government organisations, known as “official information”. Under the Official Information Act 1982, information is to be made available to requesters unless there are good or conclusive grounds under the Official Information Act for withholding it.

If you are submitting on this discussion document, you may wish to indicate any grounds for withholding information contained in your submission. Reasons for withholding information could include that information is commercially sensitive, or that the submitters wish personal information such as names or contact details to be withheld. MPI will consider such grounds when deciding whether or not to release information.

Any decision to withhold information requested under the Official Information Act 1982 may be reviewed by the Ombudsman.

For more information please visit <http://www.ombudsman.parliament.nz/resources-and-publications/guides/official-information-legislation-guides>

Your details

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

General questions: getting to know you

1. What part of the supply chain do you operate in:
 - beekeeper
 - extractor
 - processor
 - packer
 - exporter
 - retailer of bee products
 - other – please specify

2. How long have you been involved in the apiculture industry:
 - 0-5 years
 - 5-10 years
 - 10 + years
 - not applicable

3. Do you operate under:
 - an RMP under the Animal Products Act 1999
 - the Food Act 2014 (Food Control Plan or National Programme)
 - the Food Hygiene Regulations
 - none of these
 - not applicable

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

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

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

Waikato & Gt Barrier Island

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

- 0
- 1 – 5
- 6 – 19
- 20 or more

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

- beekeepers
- processors
- packers

other – please specify

Impact of compliance costs for beekeepers, processors and exporters

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

Clause 3.2...No impact to my business as I operate under a RMP currently.
Clause 3.3...no impact as above
Part 4,1.1.a,.....Implementing an individual super numbering system \$2,000 -\$5,000 .
. 4.1.1 b.....On-going recording system maintenance, \$2,000 -\$3,000 per year, (for time).
Remainder of part 4, no impact as I operate under a RMP now and comply with the proposed changes.

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

See responses in 7 above.

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

At present I have no foresight of such costs.

No additional substances to be present in New Zealand honey

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

I agree because:

I disagree because:

Part 3.1.to ensure survival of the bees.....

The principal reason for feeding is to ensure the survival of the bees.

Feeding may be needed if the hive has insufficient stores of its own. Feeding honey not originating from the hive being fed is a definite no-no as that is how American foulbrood is spread. Refer to Matheson & Reid, *Practical Beekeeping in New Zealand*, page 101... "as a rule do not feed honey to bees unless you can personally determine it is free from American foulbrood".

During the "honey season", presumably that definition means while there is a flow of nectar from the plants in the vicinity of the hives, there may be a pollen dearth requiring feeding pollen substitute patties. Pollen substitute patties are mixed with a 50% pollen replacer 50% sugar syrup. There is a need at times to feed pollen replacer with 50% sugar content.

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

The current testing for C4 sugars and for synthetic chemical residues is really the only way to ensure the honey is fit for purpose with regard to sugars and chemical residues. Ultimately the market will not be there for honey with unacceptable sugar or synthetic chemical levels.

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

I agree because:

I disagree because:

The proposal is not practical. The managing of the hives in my operation means overwintering in a single brood box, in the early spring another box is put on the hive for the expanding population to grow into prior to the honey flow. Three weeks or so before the honey flow the queen is moved to the bottom box and a queen excluder is placed between the two brood boxes. The brood emerges from the second box leaving that comb empty until the flow whereupon the colony stores nectar in that and other supers subsequently added. This method of hive management provides a strong colony of bees with a minimal amount of brood rearing when the honey flow is on. Therefore more honey stored rather than eaten by the brood.

To prevent the accumulation of varroacide residues, dark comb is replaced when the honey has been extracted from those second boxes, i.e. the first honey super on the hive.

The second reason the proposal is not practical is that moving frames from an overcrowded brood nest and replacing them with empty comb is how swarming is managed. Under the proposed regime there is nowhere I could place the removed frames, they need to be placed in a honey super while the brood develops and emerges.

A third consideration surely must be how would such a rule, prohibiting honey being extracted from honeycomb previously part of a brood nest, be policed? Rules need to be sensible, fair and enforceable. I believe this rule would largely be ignored as beekeepers efficiently manage their hives.

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

It is up to the beekeeper to manage the hives to prevent high levels of varroacide showing up in tests once the honey has been extracted. If the varroa treatments are done as per label and there is a regime of culling dark brood frames then test results ought to show acceptable levels of varroacide.

Surely if MPI can rely on the beekeeping industry to manage tutin levels in honey, the industry can manage varroacide levels in honey. The industry manages tutin in honey very well. Tutin is a far greater threat to human health than any of the varroacides.

Processors of bee products to operate under a risk based measure

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

I agree because:

I operate under a RMP programme, I agree it involves effort but I do not find that onerous. The Harvest declaration and RMP system provides a good level of accountability in my view.

I disagree because:

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

Bee products to be sourced from listed beekeepers

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

14.

I agree because:

The list will provide transparency as to the origin of honey for export but..

The system is inherently weak

Section 3.3.7 provides for reasons for excluding a beekeeper from the list and therefore from producing honey for export.
Section 3.3 7 (1) a)... how will the Director-General know if information is no longer current or is incorrect?
c)... This will only apply to those who have been caught and prosecuted.
d)... “....believes on reasonable grounds.....” I thought “innocent until proven guilty” was the rule here in New Zealand. Will the Director-General be able to deprive a beekeeper of the means to make a livelihood on suspicion without due process?

I also fail to see the need for annual renewal on the list. I suspect MPI will do little more than take the \$178.25. Will there be any background checks at renewal on the credibility of the listed beekeeper? If so who will do that and how? If no checks are made, what is the value of the list?

I disagree because:

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

A solid Harvest Declaration system for all honey for export will provide traceability for honey from the batch in the vat back to apiaries it originated from.

Pre-processing traceability requirements

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

I agree because:

I disagree because:

The proposed regime of individually identifying and tracking honey supers will involve a colossal amount of work and produce absolutely no track back information whatsoever regarding the honey.

In my small operation I can gather 150 supers in from the fields from various apiaries all listed on the Harvest Declaration.

After extraction, the honey (3 tonnes of it) is put in a vat and homogenised for tutin testing. Once the honey has been stirred for 24 hours using a mechanical stirrer to completely homogenise it the honey is then drummed off into 10 X 200 litre drums and given a batch and drum identifying number.

Anyone wishing to trace the honey back from the jar they bought it cannot get further than that batch. It is not possible to get finer detail than that regarding the honey.

Where the super that the honey was transported in to the extraction process has been and where it goes from there has no relevance whatever to the honey in the drums.

I do not know of a single beekeeper who manages hives without a fairly comprehensive log book. The information is there now.

There is one honey processor I know of who advertises his honey can be traced back to the hive it came from. Unless his batches come from individual hives he is misleading the public.

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

If all honey for export is produced under a scheme that involves a Harvest Declaration it will enable traceability “back to the batch” therefore back to the harvest declaration which has apiary identification therein .

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

An individual super identification would involve a large amount of time and work to set up. On-going maintenance of such a system would add perhaps 20% time and work to each apiary visit. The ever present feeling while implementing such a system would be “to what purpose?”

Traceability from beekeepers to operators – harvest declarations

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

I agree because:

The system works

I disagree because:

[Empty text box]

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

No, The Harvest Declaration system is robust and provides such traceability.

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

I agree because:

[Empty text box]

I disagree because:

Individual super identification would be onerous as outlined above, and it would prove nothing.

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

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

I agree because:

The E-Cert system provides for traceability

I disagree because:

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

Labelling of monofloral and multifloral mānuka honey

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

I agree because:

I disagree because:

I do not believe the science is sufficiently robust.
The peer review process does not seem to have been followed in deciding on the markers MPI proposes to implement.
The research was not published in an independent publication.
It was not sent for peer review by an independent editor of the scientific publication.
The reviews from the MPI selected "peer reviewers" were never published for the scientific community to comment upon.

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

Make the science available to the scientific community for proper peer review.
Listen to what that community says.

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

I agree because:

I disagree because:

I have concerns because:

I do not feel equipped to comment.

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

I agree because:

I do not feel equipped to comment.

I disagree because:

I do not feel equipped to comment.

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

I agree because:

I do not feel equipped to comment.

I disagree because:

I do not feel equipped to comment.

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

I do not feel equipped to comment.

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

I do not feel equipped to comment.

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

I do not feel equipped to comment.

Laboratory Tests

27. Do you support the proposed requirements for sampling and testing mānuka honey set out in Part 6 of the draft GREX?

I agree because:

I do not feel equipped to comment.

I disagree because:

I do not feel equipped to comment.

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

I do not feel equipped to comment.

Do you have any suggestions for minimising any impacts?

I do not feel equipped to comment.

Transitional provisions

29. MPI proposes a lead in time of **six weeks** between when the GREX is notified and when it comes into effect. Do you agree or disagree with this proposal?

I agree because:

I do not feel equipped to comment.

I disagree and propose an alternative timeframe:

I do not feel equipped to comment.

30. MPI proposes stock in trade provisions for honey exported between the date of commencement until six months after the date of commencement. Do you agree or disagree with this proposal?

I agree because:

I do not feel equipped to comment.

I disagree because:

I do not feel equipped to comment.

Any other feedback

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

[Empty text box for providing feedback]

Released Under the Official Information Act 1982

[Not relevant to request]

From: s 9(2)(a) [redacted].co.nz>
Sent: Thursday, 1 June 2017 3:31 p.m.
To: Manuka Honey
Subject: RE: MPI Manuka Honey Science Programme Update 30 May 2017
Attachments: Monofloral Manuka.xlsx; Multifloral Manuka.xlsx; Non Manuka.xlsx

Dear Sir/Madam,

While it would appear that MPI are reviewing their DNA testing methodology, there is no mention of any review of 3-PLA or the other three chemical markers.

I have attached 3 spreadsheets taken from MPI sampling, and classified against the chemical markers proposed by MPI.

Monofloral Manuka. This spreadsheet shows that of the 65 samples, 5 were Manuka, 55 were Manuka blend/multifloral, and 6 were Kanuka/Kunzea. 21 of these samples had MGO levels of below 80mg/kg, indicating low activity.

Multifloral Manuka. This spreadsheet shows that of the 39 samples, 12 were Manuka (and could have been called Monofloral Manuka), 3 were Manuka blend (with MGO levels above 198mg/kg), and 24 were Kanuka/Kunzea/Clover/Honeydew/Pohutukawa/Kamaha and Rata. 19 of these samples also had MGO levels of below 80mg/kg, indicating low activity indicating very little Manuka honey content.

Non Manuka. This spreadsheet shows that of the 7 samples, 4 were Manuka and 3 were Manuka blend. These samples had MGO levels of between 110mg/kg- 278mg/kg, indicating high levels of Manuka honey. These 7 samples have been able to be classified as either Monofloral or Multifloral Manuka honey.

From what I understand, 3-PLA can exist at similar levels in Kanuka honey as in Manuka honey.

The other three markers only need to be at levels above 1mg/kg to certify the honey as being Manuka.

This means that a non-Manuka honey or Multifloral honey could theoretically be raised to Multifloral or Monofloral grade Manuka by adding mostly Kanuka honey to a small amount of Manuka honey.

This is not illegal to do and is not using any synthetic ingredients.

I cannot understand why MPI are not using the UMFHA markers of MGO as the activity marker and Leptosperin as the purity marker.

These are well proven by the industry and accepted and trusted by international consumers.

If these new chemical markers are used as the new classification standards, MPI could cause serious damage to the reputation of NZ's Manuka honey industry.

Kind Regards,

s 9(2)(a) [redacted]

[Not relevant to request]

From: s 9(2)(a) [redacted].co.nz>
Sent: Friday, 26 May 2017 9:34 a.m.
To: Manuka Honey
Subject: MPI Mānuka Honey Science Programme Update 23 May 2017
Attachments: Monofloral Manuka honey 1516.xlsx; MGO above 120mg+ but not Monofloral Manuka according to MPI classification..xlsx; MPI Manuka Honey Science Programme Data; Cq 36+ honey.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

I have attached a table 'Cq 36+' of fourteen Manuka samples. All of these samples exceed 400mg/l of 3-Phenyllactic acid, 1mg/kg of 2'-methoxyacetophenone, 1mg/l of 2-methoxybenzoic Acid, 1mg/l of 4-Hydroxyphenyllactic Acid and 116mg/kg of Methylglyoxal, but all fail both the monofloral and multifloral Manuka classification because they all exceed Cq 36. There is something wrong here.

Kind Regards,
s 9(2)(a) [redacted]

s 9(2)(a) [redacted]

From: s 9(2)(a) [redacted]
Sent: Thursday, 25 May 2017 2:52 p.m.
To: 'Manuka Honey' <Manuka.Honey@mpi.govt.nz>
Subject: MPI Mānuka Honey Science Programme Update 23 May 2017

Dear Sir/Madam,

I have attached two tables based on the MPI sample data.

The 'Monofloral Manuka honey 1516' table shows all samples that would be classified as Monofloral Manuka honey using the MPI parameters below.
The 'MGO above 120mg+ but not Monofloral Manuka according to MPI classification' table shows all samples that would not be classified as Monofloral Manuka honey using the MPI parameters below.

Monofloral mānuka honey

The test for monofloral mānuka honey requires all of the 5 attributes. If the honey fails to meet 1 or more of the attributes, it is not monofloral mānuka honey – but may still pass the test for multifloral mānuka honey.

Test 1: Chemical test

The following chemicals all need to be present and at these levels:

- 3-phenyllactic acid at a level greater than or equal to 400 mg/kg
- 2'-methoxyacetophenone at a level greater than or equal to 1 mg/kg
- 2-methoxybenzoic acid at a level greater than or equal to 1 mg/kg
- 4-hydroxyphenyllactic acid at a level greater than or equal to 1 mg/kg

Test 2: DNA test

- DNA from mānuka pollen (DNA level required is less than Cq 36, which is approximately 3 fg/μL)

The samples in the '**MGO above 120mg+ but not Monofloral Manuka according to MPI classification**' table, are all above 120mg/litre Methylglyoxal, but none of these can be classified as Monofloral Manuka according to MPI's classification standards.

It would appear that the new MPI grading standards are seriously flawed.

The MPI standards are classifying Monofloral Manuka honey that should **not be** classified as be Monofloral Manuka honey and, at the same time, not classifying Monofloral Manuka honey that **should be** classified as Monofloral Manuka honey.

The only common denominator for correct classification of Manuka honey in all of these samples, is Methylglyoxal. If a minimum level of 120mg/l MGO was set as the minimum classification marker for Monofloral Manuka honey, then it would appear that we have a standard that almost everyone would agree with.

It seems to me that the UMF Association has figured out a classification method already.

MPI should be adopting the UMF Association classification method.

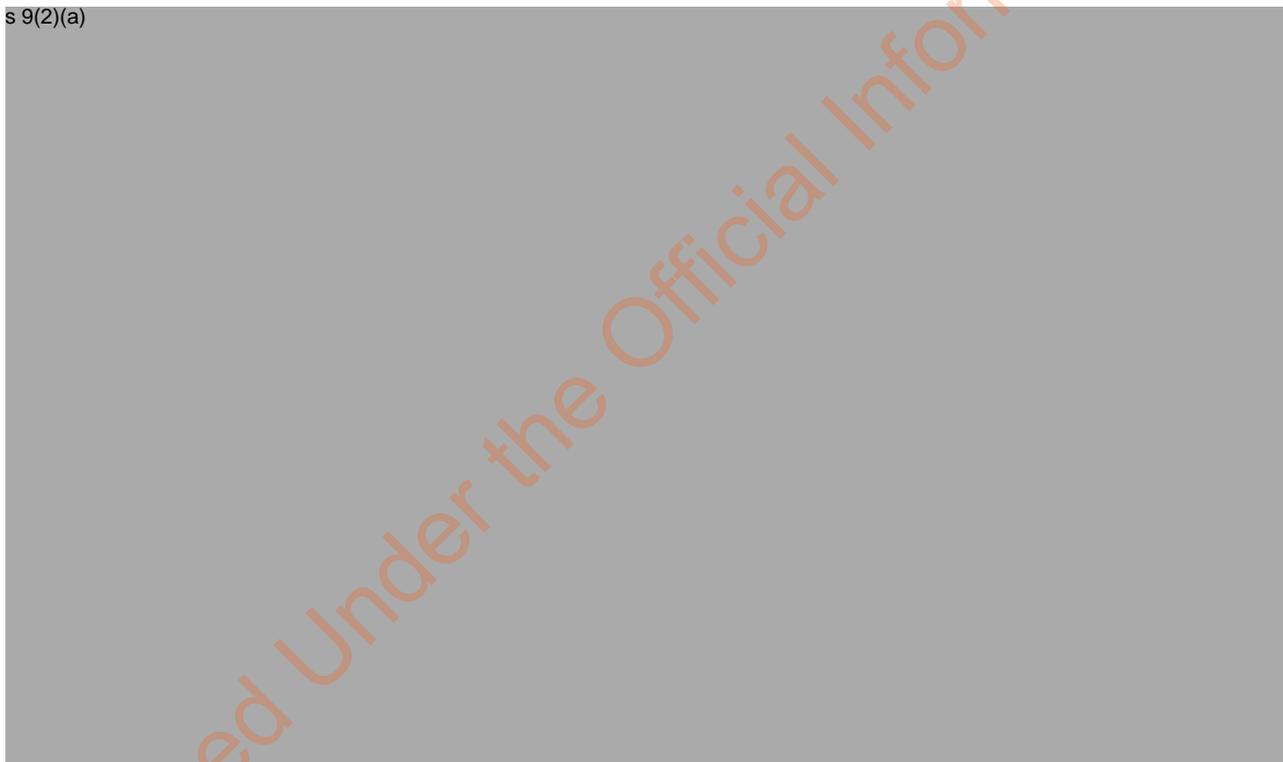
I would like to circulate these findings with the Apiculture industry to get their views.

Could you please give me permission, not later than tomorrow afternoon, to circulate these findings?

I look forward to receiving your favourable response.

Kind Regards,

s 9(2)(a)



SUBMISSION FOR

‘PROPOSED GENERAL EXPORT REQUIREMENTS FOR BEE PRODUCTS’

MPI DISCUSSION PAPER NO: 2017/11

The following submission is written by s 9(2)(a), beekeeper and processor of bulk honey and other bee products.

Contact details: s 9(2)(a)

s 9(2)(a)

In this submission I will be commenting on the proposed requirements relating to production, processing and preparation (4.3.1) and the proposed requirements relating to traceability (4.4.1).

Comments on 4.3.1 Honey to be fit for purpose.

I disagree with the proposal that honey is only harvested from honey supers that do not contain honeycomb that was previously part of a brood nest to prevent the contamination of honey with varroacide residues.

The reasons for this is that it will impact on practical (time and cost) and effective beehive management. There are times when you need to be able to exchange combs from the brood nest into boxes that have been put on the hive for honey collection. This helps swarm control and to provide the queen with extra space to lay. Bringing brood frames up into the super also encourages the bees to move up into that box and start preparing it for the honey flow.

I would like to see how much of a problem this is in New Zealand already and what research has already been done on the fluctuation of varroacide levels in different parts of the hives i.e between frames that have been in direct contact with varroa treatment and those that have not.

An alternative approach should be to make it mandatory for testing to be done on batches of honey (as with tutin) for varroacides, and those test results would need to be below the allowable limit before the honey can be sold to a packer and/or consumer. The risk should be put on the individual beekeeping company. Also, this is useful if there are any residues found below the allowable limit, as the beekeeper is made aware that there may be residue problems starting, and put processes in place to reduce this.

Comments on 4.4.1 Pre-processing traceability requirements.

I strongly disagree with beekeepers having to indelibly mark each honey super with a unique form of identification.

I attended one of the meetings that MPI held to discuss these proposals. From the comments made at that meeting I believe MPI already has a better understanding (from when this proposal was put

together) of the reality of honey processing and therefore I do not think I have to go through the step by step process for you to understand my comments.

Realistically, the process of honey production, processing and packing of honey means that trace back of any contaminated product back to a specific super and therefore a specific hive is impossible.

Trading partners should be strongly advised of the impracticality of this proposal.

Alternatively, they should be advised that traceability of a batch of honey back to an apiary site is both practical and achievable.

For the purpose of honey production, I believe most commercial beekeepers manage their hives within an apiary as one unit (being the apiary) and already keep records back to the apiary level.

Trading partners concerns should be alleviated knowing that if anything did need to be traced back to the hive level, it can and will be traced back to the apiary level, which actually will be more effective in containing and eliminating any contaminated product that comes from that apiary.

Trace back systems of some other primary products do not require trace back to the individual production unit for obvious reasons. E.g Kiwifruit cannot be traced back to the vine it grew on. A bottle of wine cannot be traced back to the individual vine the grapes that produced that wine came from. The milk or block of cheese cannot be traced back to the specific cow it came from. They can however be traced back to a more reasonable and practical production unit such as the orchard, vineyard or farm.

If, in the event that contaminated product was found and there was concern that supers and honey frames could still be a source of that contamination, then it would be up to those affected beekeeper/s to have to test all their honey the following season to make sure there is no further contamination.

That I believe is a robust enough system for the small chance that a significant contamination event might occur.

MPI should take the concerned trading partners to visit a beekeeping, honey processing and packing facility where a knowledgeable and experienced team can take them through the step by step process of honey processing which will demonstrate to them how much the honey from different supers gets mixed up during the process and therefore traceability back to a single hive is impossible. At the same time traceability back to an Apiary site/s will be shown to be possible.

Thank you for the opportunity to submit the above comments.

s 9(2)(b)(ii)

[Not relevant to request]

From: s 9(2)(a) [redacted].co.nz>
Sent: Tuesday, 30 May 2017 9:30 p.m.
To: Manuka Honey
Subject: No sugar fed therefore differing test results?

Follow Up Flag: Follow up
Flag Status: Completed

Hi there,

We are a small commercial honey company, who has grown since 2009 to 350-380 hives. We feed no sugar at all to our bees, except early season when we stimulate to develop our queen rearing, but never to our hives. We feed back frames of honey with pollen – naturally as the bees intend and need. I understand this isn't recommended disease-wise, but we have a very low incidence of AFB and our hives consistently out-produce our local beekeepers. We averaged 42kg/hive this last summer crop, with healthy hives from start to finish. Usually it's double that.

This may mean our test results for our honey will differ from most other commercial beekeepers.

If you're interested in any samples from us, please let me know. It might be helpful for some of these differing test results recently, as maybe not all people will feed as much. With the widespread use of sugar, syrup and invert, this must surely affect honey results, especially over a hard season like we've all just experienced.

Just a thought, which I feel will have definite import on our tests, both nationally and at an export level.

Kind regards,

s 9(2)(a) [redacted]

Released Under the Official Information Act 1982

[Not relevant to request]

From: s 9(2)(a) [redacted].co.nz

Sent: Friday, 2 June 2017 12:41 p.m.

To: s 9(2)(a) [redacted]

Subject: Fw: DNA test failed Manuka honey

Hi s 9(2)(a) [redacted]

The attached is the data extracted from MPI honey CART data.

- I used only NZ honey data.
- I removed all data that passed DNA test
- I removed any data failed for 4 chemical markers to be qualified as monofloral Manuka.

The rest is what you can see in the attached data.

- I can see they are almost all from region 8, archive.
- They have very good 3-PLA numbers.
- Apart from one sample with MGO 645 (Region 12), the rest of them are below UMF 15+ honeys.

Would the DNA test failing issue is not just for high UMF honeys (which can be old honeys) but also could be any OLD honeys with reasonable MGO (and from certain region)?

I am just passing my thought.

Kind Regards

s 9(2)(a) [redacted]