

13 June 2017

MPI Food Assurance Team
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: manuka.honey@mpi.govt.nz

Dear Sir/Madam

Attached are the comments that Apiculture New Zealand wishes to present on the *Proposed General Export Requirements for Bee Products*.

You will note that this document specifically covers Apiculture New Zealand's comments on the GREX, including a proposed rewrite of the Traceability Section 4.1.

We have prepared a separate document on the Ministry's Manuka Honey Science Definition titled, *Submission by Apiculture New Zealand on MPI's Mānuka Honey Definition (Apiculture New Zealand Standards, Compliance and Regulatory Focus Group)*

Yours sincerely



Karin Kos
Chief Executive

13 June 2017

Proposed General Export Requirements for Bee Products

**SUBMISSION BY APICULTURE NEW ZEALAND ON
THE PROPOSED GREX
(*Apiculture New Zealand Standards, Compliance and
Regulatory Focus Group*)**

Your details

Your name and title:	Karin Kos, Chief Executive
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:	Apiculture New Zealand Standards, Compliance and Regulatory Focus Group
Your contact details (such as phone number, address, and email):	Level 7, 22 Panama Street, Wellington Tel 04 471 6254 Email: ceo@apinz.org.nz

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; peak industry body for Apiculture

How long have you been involved in the apiculture industry:

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

2. 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

3. 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

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

National industry organisation based in Wellington

5. 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

6. 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?

Compliance costs must always be kept to a minimum with any costs incurred measured to the value of any worthwhile outcomes achieved.

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.

GREX Clause 4.1 Pre-processing traceability requirements.

We have estimated a snap shot of the cost to industry to indelibly mark each honey super with a unique form of identification. This is based only on the commercial element of the industry involving 720,000 hives with all honey supers fitted with RFID tags (fibreglass nail with technology embedded).

- 3 supers per hive - RFID unit cost at not less than \$1.00 each = \$2,190,000
- Labour to install at say \$ 2.00 per super = \$4,320,000
- 600 scanners (at best 1 per 3 beekeeper team basis 400 hives per beekeeper) at say \$1000 each = \$600,000
- Technology collection and management – 1100 businesses at say \$2500 = \$2,750,000
- On-going replacements annually \$500,000
- Technology links to AFB or Industry database - \$300,000

Increased compliance cost – additional staff, RMP and Compliance audits, AFB audits
There will be more costs, the roll out would be slow, and the uptake frustrating for beekeepers. We would expect an initial start-up cost to the industry of greater than \$10,000,000 as a minimum. There would likely be a time delay as technology stocks will not be at hand, non-compliance will be considerable and ongoing for a considerable period – what impact on the industry’s ability to trade

Clause 3.3

We also note the cost of listing for 800 commercial beekeepers at \$178.25 per year. \$142,600 – how many non-commercial beekeepers will also need to register 1000, 2000 or 3000 – they produce saleable quantities of honey.

Part 6 of the GREX

The costs of the new testing to verify whether a honey is Manuka or not is an added cost to industry considering that the previous ‘grading’ tests will continue to be undertaken. Total cost to industry is difficult to estimate but ApiNZ Standards Focus Group notes that the chemical marker and DNA tests are expensive and that the total added costs of testing honeys will be very significant. Will this be drum by drum – 8000 metric tonne = 24,000 drums all requiring verification.

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)?

The ‘other’ costs that will arise will certainly include administration.

The beekeeper at the hive will need to be trained to use new technology. Mistakes inevitably made will involve extra administration time which directly reflects added cost.

Smaller beekeeping businesses without the technical skills would struggle and need to employ added administrative staff. Another added cost.

The laboratory testing of honey with the new manuka definitions will incur much greater cost. A point to consider is that the tests to determine any grading of all honeys will still need to be undertaken. Remembering there are other honeys than manuka which also need analysing using accepted traditional methods.

There is no doubt to the importance regarding sampling of honey, staff training and record keeping but it creates more administration and therefore added cost.

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:

ApiNZ agrees in principle with MPI's intention to ensure additional substances are not present in New Zealand honey.

I disagree because:

However, we disagree with any restrictive directives regarding beekeeping methodology.

There are many reasons why beekeepers would have honey supers on hives when the bees may also need feeding. e.g. one such example would be for managing swarm control by simply giving the bees some space in the hive to help prevent the development of any swarming impulse. Beekeepers could give many other examples equally important to the successful management of their hives.

Beekeepers are aware of the costs to themselves of their honey being rejected and know that 'suspect' honey could at any time be tested for sugar content.

We question where is the proof of the problem? It has been documented previously that problems with C4 sugars in honey has invariably been associated with high active Manuka honey, it is not evident in any other honey variety. There is science, that has been previously shared with MPI, of this correlation that prove the tests are indicating false positive results that are a phenomenon unrelated to any sugar feeding of hives.

We discourage any further compliance requirements such as documenting the circumstances when bees are fed with anything other than honey.

The proposed documentation, as suggested by MPI, will not enhance any purposeful outcomes and in practice would be virtually impossible to regulate. This would most likely prove to be a case where a compliance cost would achieve no added value. (See our comment question 7)

We recommend that clause 3.1 (2) be deleted from the GREX.

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

It is suggested that beekeepers declare in the Harvest Declaration that industry best practice has been adhered to.

Simple definitions of what constitutes industry best beekeeping practices can be outlined in the Guidance box at the end of **PART 3: 3.1**

An example is suggested as per below.

Guidance

To ensure that bee products intended for export are fit for their intended purpose, in relation to composition and representation, beekeepers must adhere to Industry best beekeeping practice which typically requires that:

- a) the beekeepers hive management practice ensures any supplementary feeding of the hives is performed in such a way as to minimise the risk that any honey harvested would contain anything other than naturally gathered nectar and pollen; and
- b) that a recycling policy of removing old brood comb out of the beehive is practiced with the purpose of reducing possible contamination of any varroacide or bee pathogen residues. This best beekeeping practice policy will develop stronger bee health rewarded with increased production; and
- c) that all varroa treatments are used as specifically recommended by the manufacturer; and
- d) that beekeepers must maintain the integrity of product traceability by employing a practice that ensures each stack of honey loaded onto the truck at harvest is clearly marked and identified to its originating apiary, with the date of harvest, during transit and storage through to process.

Any bee feeding method referred to in clause 3.1(1)(a) should be a recommendation to conform to industry best beekeeping practice that will achieve a harvest outcome of pure unadulterated 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:

The ApiNZ Standards Focus Group agrees in principle that the issue needs addressing but

I disagree because:

Disagrees with the approach being suggested as beekeeping has some complex and varied methods of operation within the hive. Best practice outcomes should be encouraged rather than having undefinable prescriptive beekeeping methods written in to the GREX which would be impossible to audit to compliance.

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

We suggest that it is most often the beekeeping practice that needs to improve. Please note the Guidance paragraph as suggested in the previous question.

Recommend PART 3: 3.1 (1) b) (honey is not harvested from honeycomb previously part of a brood nest) is totally deleted from the GREX.

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:

Agree.

The purpose of traceability is to give confidence in the product. That is why New Zealand's RMP operators, who are professional in their operations, have verifiable record-keeping systems in place and are audited regularly. All operators are responsible for the integrity of traceability and that ultimately depends on the accuracy of all documentation.

Industry should not need to carry the burden of potentially non-compliant product stemming from premises operating under differing criteria that may potentially damage our overseas reputation.

All bee products compliant for export must be processed and remain within an RMP system.

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:

Beekeepers supplying bee products for export must be listed so they are known to both MPI and the RMP operator. It is important that contact details are available to both the operator and MPI so that relevant information may be confirmed.

However, it must be acknowledged that the cost of listing does create an economic barrier for beekeepers with small hive holdings which in turn encourages many to remain non-listed. In this regard, we question why subsequent annual renewals should cost the same as the initial registration.

As always with these subscription type renewals it is always the non-compliant minority who endlessly soak up the administrative budget. It is suggested therefore to introduce a rewarding proviso that, if renewal is paid by the due date, the annual renewal cost would be reduced to half i.e. \$86.25.

Or alternatively, a once only registration fee could be applied, which would be a fairer process, encourage higher transparency and stop product being driven underground.

Industry would be more supportive of the listing system if **annual listing renewal costs** were not so prohibitive and were structured also to encourage compliance.

I disagree because:

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

It has been recommended to industry that in time the AFB PMP Apiweb system will need to be completely overhauled and upgraded as its functionality is now outdated.

As part of this overhaul we strongly recommend that the apiary registration system is designed to accommodate all the regulatory functions that MPI and Biosecurity may need to provide apiary registration and beekeeper information. This could also include, for example, locations of RMP premises, Honey houses and other storage facilities etc. as an enhanced tool not only for biosecurity purposes but also bee product traceability.

If legislation provided for this enhancement then the need for 'listing' beekeepers may in time become redundant as the Industry database provided all core information.

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:

Disagree as a system of indelibly marking and tracing each honey super with a unique marker will not work for the majority of beekeepers. Most beekeepers will find maintaining accurate and meaningful tracing records impossible which would lead to an unsatisfactory traceability outcome, and massive non-compliance.

An achievable and more practical 'in-field' system, such as simply tagging stacks of honey as harvested and loaded onto the truck at the apiary, as currently widely practised, will be more suitable and acceptable to industry.

The ApiNZ Standards Focus Group suggest that the same traceability outcome, that the MPI's proposal to indelibly mark each honey super was endeavouring to achieve, will be successfully achieved with the added inclusion of a bullet point within the Guidance section found in PART 3 3.1 - Honey to be fit for purpose.

This bullet point could be written as a requirement pertaining to best industry practice to maintain bee product integrity as related to traceability.
Perhaps this could be written as;

- That beekeepers must maintain the integrity of product traceability by employing a practice that ensures each stack of honey loaded onto the truck at harvest is clearly marked and identified to its originating apiary along with the date of harvest, during both transit and storage through to process.

(Please also refer to the Guidelines as drafted in question 10.)

This does not preclude larger or any operations who may wish to manage their businesses using high levels of technologies, given they would have the scale and expertise to find value in the information for other apiary management functions.

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

In terms of achieving traceability, rather than a system of indelibly marking and tracing each honey super with a unique marker, it could help if a beekeeper's honey supers were marked (i.e. branded or numbers painted on) but only with the beekeeper's registration number as given under the AFB PMP. This would provide at least some visual and practical traceability especially at the operator's premises where several beekeepers honey supers may be stored awaiting processing.

It must be noted that many beekeepers are actually indelibly branding their supers anyway as a means to combat theft etc. Industry would need a lead in time of at least two years to become fully compliant.

A review of unique marking protocol is required so that traceability of ownership past and present is correctly recorded on beekeeping equipment.

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?

Feedback from ApiNZ and from those attending MPI's regional workshops have shown a clear indication that the costs associated with this both in dollar terms, time and frustration would be intolerable. The proposal will not be acceptable by any means.

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:

Yes, all bee product harvested for export must be declared on a Harvest Declaration. Of paramount importance are the declarations of the date of harvest and location from where honey was harvested for compliance with the Tutin in Honey Standard, and also, the declaration of compliance to the AFB Pest Management Plan, an issue of growing importance.

I disagree because:

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

ApiNZ Standards Focus Group has as part of the consultation process met with MPI to discuss and introduce new ideas that will work better for industry and strengthen the traceability down the supply chain for both domestic and export consumption.

Key to the recommendation of the Standards Focus Group is that when a bee product is harvested the beekeeper must provide a harvest declaration statement at point of first delivery of the bee product to an RMP premise.

The Harvest Declaration introduces the 'raw' bee product into the RMP system.

It is the document on which the listed beekeeper or beekeeper/operator, on delivery of the bee product to the RMP premise, declares all relevant harvest information such as number of supers, registered apiary sites, date of harvest etc. Most importantly, the beekeeper signs a declaration of compliance to the regulatory requirements of the harvest, safety, traceability and AFB status of the product.

For ease of compliance regarding practicalities at delivery to an RMP premise, the original harvest declaration is proposed to be a paper version and signed on delivery to the premise.

RMP operators may choose to use an electronic version but must also print and hold on file a paper version of the declaration signed by the beekeeper.

The beekeeper must keep a copy of his/her harvest declaration (duplicate copy). The RMP operator who now takes responsibility for the product within the RMP keeps the original copy.

It is only when the honey supers are processed (extracted), and only when the honey is in the bulk holding tank, pre-drumming off, does the product become a Batch (as defined in the GREX).

The 'harvested product' as documented in the harvest declaration has now been processed into a Batch. The Batch is recorded as a definite quantity of bee product that can now be identified as it progresses down the export chain, for example per pail, drum or pallecon.

The operator must maintain a verifiable inventory control system to record all the process details by keeping extraction or processing records, stock and batch records to demonstrate traceability that will ultimately be required when providing a Bee Product Process Document.

It is proposed that MPI design and provide on their website a Bee Product Process Document (Process Document).

As the Process Document is operated within the RMP system it could be in either electronic or paper form but must be identifiable to the operator with a unique code and/or reference number as determined by the operator. The purpose of the Process Document is to strengthen traceability by assisting the operator in providing a process and procedure to support traceability - from the raw bee product - to a processed bee product - to the final packed or bulk product - to export.

MPI would need to decide whether the declarations as signed by beekeepers on the Harvest Declarations have any need to be carried forward on the process document. We suggest they needn't. However, we do recognise that the Tutin (and potentially the AFB) status of the batch of honey, now as a processed product, needs to be declared, but by the operator.

The Process Document must accommodate at least two purposes.

1) To provide the link from the raw product to the processed batch.

It is the document that will provide a system to link traceability from the apiary (Harvest Declaration) to the processed Batch. A Process Document will be filled out for each Batch of extracted honey. For traceability and verification purposes, operators would need to develop their own compliant record keeping systems.

As an easy example, a copy of the Process Document could be printed and simply have the paper copies of the relevant harvest declarations attached (i.e. stapled) and held in a file. Or the Harvest Declaration could be scanned and held on record electronically

Or any alternative method the operator may prefer using their technology options to best advantage.

2) To provide a process to link product batches or part batches between operators.

A Process Document will accompany consignments of processed bee product when transferred to another premise. Rather the same way as the harvest declaration has been used by industry in the past. It provides both the consignor and consignee with greater consignment detail and importantly could be used to reconcile traceability between operators as to number of drums per batch or cartons of packed product etc. The process document could be emailed through earlier with other documents such as laboratory reports, pollen analysis, MGO, manuka definition, Tutin test results etc. as many in industry currently do.

Traceability of bee product between operators may well meet the regulatory requirements using E Dec. transfer documentation. However, traceability will be strengthened by providing process and procedure options to support compliance within industry.

MPI must then design the format and content of the process document to be fit for purpose.

The ApiNZ Standards Focus Group consider there will be no added value to traceability by indelibly identifying each honey super with a unique form of identification. But when used for its primarily designed purpose, the Harvest Declaration will strengthen the traceability between beekeeper and operator from harvest to delivery at the RMP premise.

The Focus Group in working with MPI has previously forwarded an example of a rewritten traceability section of the GREX. It is an easier way to communicate and understand the detail in the hope that it will make a good start to fulfilling the purpose of the GREX in a way that is most workable for industry as well as meeting the regulatory requirements.

An updated version of PART 4 has been drafted and is included at the end of this document, as Appendix 1.

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:

I disagree because:

The pre-processing costs of complying with the process that MPI are suggesting in the draft GREX will be extremely onerous for the beekeeper. Added focus of traceability on each individual honey super creates huge added compliance costs which will not deliver any value gain, as the process will not achieve any added benefit around traceability or product value.

Please refer to our statement in question 7.

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:

Yes agree.

I disagree because:

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

If the recommendations outlined above, regarding the traceability from beekeepers to operators, are adopted then the detail of transfer documentation should be thought through to capture any important elements of traceability, for instance by referencing any relevant Process Documents etc.

It is suggested that industry does not differentiate between export bee product intended for countries requiring official assurances or for countries not requiring official assurances. It is considered better that all product is treated equally to the highest requirement.

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:

Yes

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:

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:

Yes

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:

Agree because the grading systems are how the value of the product is determined. The new definition should not change what is genuine manuka honey. The intention of the new definition is to strengthen the integrity of the product. So, in effect this should not impact on the current grading systems.

I disagree because:

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

The determination of where ultimately the line is drawn between mānuka and mānuka multi-floral or blend will potentially impact the price that is paid by the market. It is important that this determination lands correctly, otherwise we risk damaging the market through low grade inferior blended mānuka.

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

Yes, and please see our separate submission, titled:
**Proposed General Requirements for Bee Products
Submission by Apiculture New Zealand on MPI's Mānuka Honey Definition
(Apiculture New Zealand Standards, Compliance and Regulatory Focus Group)**

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:

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?

See earlier comments Para 8.
Drum by drum analysis is common practice for mānuka.

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:

ApiNZ considers the MPI lead in/transition time to be entirely impractical and not feasible adding significantly to cost in several areas. While we appreciate the desire that the changes apply to the coming season, this should not be 'at any cost'.

The standard period for amendments to the Australia New Zealand Food Standards Code is 12 months and at times this period is extended. A transition period of 12 months does not prohibit earlier uptake by industry should that prove commercially advantageous or commercially feasible. However, it does provide relief for those operators with extensive stock in hand and for smaller operators.

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:

Yes, industry will have to work with this requirement.
Industry has known that there will be a change and have reacted to that uncertainty for a while now.

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).

Government mānuka honey science definition. **Please also see separate submission by ApiNZ titled: Proposed General Requirements for Bee Products Submission by Apiculture New Zealand on MPI's Mānuka Honey Definition (Apiculture New Zealand Standards, Compliance and Regulatory Focus Group)**

If complications arise from any uncertainty regarding the robustness of the mānuka definitions then the notification of the GREX should be delayed until such time that both MPI and industry are confident with any strengthening amendments to the definitions that either industry or MPI may have suggested.

It is very important that the definitions are robust enough to satisfy all the original objectives. Those include such things as;

- Will the definitions protect consumers and producers from fraud?
- Will they also provide markets with confidence and assurances?
- And will they protect our reputation as a supplier of safe and authentic food?

If these basic criteria are not met then the mānuka industry could expect to take a huge set back.

We only get one shot at this and we both, MPI and industry, need to each have confidence that the definitions are fit for purpose and that we have got it right.

Appendix 1: 4.1 Traceability – proposed content from ApiNZ

General Export Requirements for Bee Products

Part 4: Requirements relating to traceability

4.1 Pre-processing traceability requirements.

(1) Beekeepers must:

- a) Indelibly mark each honey super with the unique beekeepers' identification code as allocated and issued by the AFB PMP; and
- b) For each apiary site where hives are located in a harvest season, keep records of the following information:
 - 1) The global positioning system (GPS) location of the apiary site (sites are required to be notified under the AFB PMP); and
 - 2) The dates and volumes of honey (e.g. number of supers) or other bee products harvested from each individual apiary.
- c) Provide any of the information specified in paragraph (b) to any of the following officials as applicable, within 24 hours of a request being made by any of them:
 - i) the Director-General;
 - ii) an animal product officer;
 - iii) recognised agency or recognised person; or
 - iv) an authorised person.

- (2) Where honey supers are sold, any previous beekeeper identifier must be struck through such that it is still legible so it is clear as to the previous owners of the honey supers.

*Comment regarding 4.1 (2) for MPI to consider (not intended as content of GREX)
The current ruling under the AFB PMP Order 1998, requires the beekeeper to remove or alter the existing identification code in such a way as to make it clear that the identification code no longer applies to that beehive and beekeeper.*

It is the recommendation of the AFB PMP, that this is reviewed and that the history of ownership is retained on the honey super with ownership codes left intact. The original owner being the top brand (code) subsequent ownership to sit below. Branding placement instructions will need to be determined.

Guidance

- Beekeepers should be particularly aware of the requirements set out in clause 13.45 of the Animal Products Notice: Specifications for Products Intended for Human Consumption (issued 1 March 2016).
- That clause 13.45 requires apiarist and beekeepers to ensure that:
 - beehives are constructed of and maintained with materials that are not sources of hazard to the honey or other bee products; and
 - honey supers, both before and after extraction, are stored in a manner that will minimise contamination; and
 - honey supers are protected from contamination during transportation to minimise exposure to dusts, fumes and other contaminants.
- Beekeepers should be aware that all apiary sites used for honey production are required to be registered under the AFBPMP.

4.2 Traceability from beekeepers to operators - Harvest declarations

- 1) A beekeeper must prepare a harvest declaration for every delivery of bee product that the beekeeper intends to supply to an operator for export and:
 - a) provide the declaration to the operator who first processes the bee product; or
 - b) if the beekeeper is also the operator, keep the harvest declaration as part of his or her records.
 - c) the operator must have a verifiable policy and procedure that provides traceability of every portion of any consignment of bee product that enters the premises for processing.
- 2) A harvest declaration must be in the form notified by the Director-General on the relevant MPI website and must include the following information:
 - a) a unique harvest declaration reference number as assigned by the operator;
 - b) name and business address of the beekeeper;
 - c) beekeeper listing ID (where applicable);
 - d) any registration number provided to the beekeeper under the AFB PMP;
 - e) name of the operator receiving the bee product and the receiving RMP identifier;
 - f) bee product type (e.g. Honey, Pollen, Propolis);
 - g) quantity and unit (e.g. Supers, boxes, kilos, mats) of product;
 - h) descriptive code to identify between any differing portion of the consignment e.g. seasonal, geographic or nectar specifics of any bee products
 - i) each apiary MAF ID number (as allocated under the AFB PMP) from where the product was harvested;

- j) date of harvest;
 - k) declaration of compliance with the ACVM Act 1997 where agricultural compounds were used on or in the hives;
 - l) if the bee products are honey, identify whether it needs to be tested for Tutin and, if not, on what grounds;
 - m) declaration that hives were free from clinical signs of AFB as per the latest inspection carried out by an authorised person pursuant to the AFB PMP;
 - n) declaration that best beekeeping practices were adhered to and that the hives were not fed feed supplements other than for bee health and survival purposes throughout the harvest season.
 - o) declaration that the harvesting, storage, and delivery of the product minimised its exposure to contamination.
- (3) A harvest declaration is not valid unless:
- a) it is signed and dated by the beekeeper who submits it; and
 - b) the information it contains is complete, accurate and truthful.
- (4) The purpose of the harvest declaration is to confirm matters within the knowledge of the beekeeper relating to the fitness for purpose of the product.
- (5) The operator who first processes the bee product must not commence processing the bee product, and must not transfer it to a third party, unless:
- a) the harvest declaration has been received; and
 - b) the operator has checked the harvest declaration to ensure it is complete and reasonably believes the harvest declaration to be accurate and truthful.
- (6) For every harvest declaration received by an operator from a listed beekeeper or from the beekeeper who is also the operator, the operator must:
- a) sign and date the harvest declaration; and
 - b) assign a unique reference number in the following format; for example, PHDK999/230417/051 where PHD is Paper Harvest Declaration, K999 is the beekeeper registration number as provided to the beekeeper under the AFB PMP (simplified without any leading zeros in the number), forward slash, date ddmmyy, forward slash, '051' being the digits unique to that harvest declaration as assigned by the operator; and
 - c) print the number referred to in paragraph (b) on to the harvest declaration.
- (7) The operator must retain a copy of every harvest declaration supplied by a beekeeper and a register of the unique number allocated to that document.

- (8) The operator must maintain the traceability from the harvest declaration to the batch of processed bee product by preparing a Bee Product Process Document for each batch of bee product processed. The operator must keep a record of all Bee Product Process Documents and attach a copy of the relevant Harvest Declaration/s to each Bee Product Process Document.
- (9) The purpose of the Bee Product Process Document is to provide the operator with the processes and procedures to support traceability of the processed product for export.
- (10) The bee product process document:
- a) must be in the form notified by the Director-General in a relevant MPI website; and
 - b) be provided in paper or electronic form; and
 - c) must be signed (electronic signature is acceptable) and dated by the operator; and
 - d) must contain the following information:
 - i) name and business address of the operator;
 - ii) RMP identifier and a unique reference number for the process document;
 - iii) bee product type (i.e. Honey, Pollen, Propolis);
 - iv) bee product batch reference (e.g. Bh2-17);
 - v) definite quantity of batch (i.e. number of drums, pails, cartons);
 - vi) the assigned unique reference numbers to the relevant harvest declarations;
 - vii) declared Tulin statement relative to each Harvest Declaration
 - viii) declaration that the processing and storage of the product minimised its exposure to contamination.

4.3 Traceability between operators – Transfer documentation

4.3.1 Application

- (1) This clause 4.3 applies to all bee products intended for export to countries for which official assurances are not required.

Guidance

- An operator is not required to comply with this clause 4.3 if he or she is exporting to a country that requires an official assurance.
- Bee products intended for export to countries for which official assurances are required are already subject to the traceability provisions in the [Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products](#). Therefore, they are not required to be subject to the traceability provisions in this clause 4.3.

4.3.2 Transfer documentation accompanying bee products not requiring official assurances

- (1) Where a consignment of bee products not requiring an official assurance is transferred from one premises to another, the operator of the sending premises (the consignor) must provide a transfer document to the operator of the receiving premises (the consignee).
- (2) The transfer document:
 - a) must be in the form notified by the Director-General in a relevant MPI website;
 - b) may be provided in paper or electronic form; and
 - c) must be signed (electronic signature is acceptable) and dated by the consignor;
 - d) must contain the following information:
 - i) name and ID of the consignor (i.e. RMP ID or Risk-based measure ID under the Food Act 2014, whichever is applicable);
 - ii) name and ID of the consignee (i.e. RMP ID, Risk-based measure ID under the Food Act 2014 or exporter registration ID, whichever is applicable);
 - iii) source transfer document;
 - iv) departure date;
 - v) product description;
 - vi) packing unit;
 - vii) quantity of unit;
 - viii) net weight;
 - ix) market eligibility list;
 - x) if the bee products are honey, identify whether it needs to be tested for Tutin and, if not, on what grounds; and
 - xi) declaration of whether the product is fit for purpose.
- (3) To avoid doubt, nothing in this clause 4.3.2 prevents an operator who is an authorised user from raising a transfer document (i.e. eligibility declaration or eligibility document) in AP E-cert for the purposes of this clause.

4.4 Reconciliation of traceability documents

- (1) Operators must have processes and procedures to demonstrate traceability as follows:
 - a) the connection between a harvest declaration, a bee product process document and a resulting outgoing transfer document (as required under clause 4.3.2) where bee product identified in the harvest declaration is transferred to other premises with that outgoing transfer document; and
 - b) the connection between an incoming transfer document and a resulting outgoing transfer document where bee product identified in the incoming transfer document is transferred to another premise with that outgoing transfer document.
- (2) Transfer documents that are raised for the transfer of bee products identified in a bee product process document must contain the unique reference number of that bee product process document.

