



APICULTURE

NEW ZEALAND

SUBMISSION

TO: The Primary Production Select Committee
FROM: Apiculture New Zealand
SUBMISSION ON: Briefing to follow up on the Inquiry into Honey
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Background

The Primary Production Select Committee is seeking views on how the Government’s regulatory definition on mānuka honey is working. This follows the initial Primary Production Select Committee-led Honey Inquiry in March 2018.

At the March 2018 Inquiry, Apiculture New Zealand made a submission noting that the Government-regulated mānuka honey science definition provides an initial stake in the ground for industry and consumers. We added that continuous improvement was critical to ensure that the science is international best practice; the definition itself is ‘fit for purpose’ and universally supported.

Also, that ongoing consumer trust and market confidence are critical to the success of our industry and that our consumers expect safe and genuine product, backed up by a transparent and robust quality assurance and regulatory framework.

In addition, foreign regulators and trading partners also need confidence in the work of our regulators, including the regulatory mānuka honey definition before they will accept it and apply it within their own marketplace.

This context remains relevant today and largely underpins our involvement in the Joint Industry/MPI Mānuka Honey Science Steering Group (MHSSG) with the aim of evolution and improvement of the definition over time.

The following table charts some of the issues that have been raised by our members, some that are being addressed via the MHSSG, along with potential responses.

ISSUES	RESPONSE
<p>1. DNA Marker Stability Industry evidence has been submitted to MPI demonstrating a reduction in the recoverable mānuka DNA over time. This has the effect of causing honey to fail the regulatory definition as it ages.</p>	<p>Stability Investigation – in progress The MHSSG, which includes ApiNZ, is planning for an independent stability investigation that will include all five markers employed in the regulatory definition.</p> <p>Other markers with potential to be included in future definition have also been included in the investigation, the results of which will provide evidence of stability to a standard required by MPI to inform further decision making.</p>
<p>2. False Non-Mānuka The term ‘false non-mānuka’ has emerged as a consequence of how the rules of the regulatory definition are applied. A honey containing at least the minimum levels of markers to be called multiflora mānuka can become ineligible if one of the markers (3-PLA) is too high.</p> <p>Ironically, the resultant non-mānuka honey can sometimes be diluted with another honey (e.g. pasture) to reduce the 3-PLA sufficiently to make the final blend eligible to be called multiflora mānuka.</p>	<p>Reassess Policy Position While the situation might be addressed by removing the upper limit for 3-PLA, Apiculture NZ supports a broader industry review of the labelling and eligibility requirements, as part of the evolution of the Standard.</p>

In addition, there remains a concern that there is potential for the addition of illegitimate substances under the current definition (See point 4.)

3. 2-MAP Regional Variance

There are reports from some in the industry of regional variance in relation to one of the chemical markers within the definition (2-MAP). They have reported that they are disadvantaged by the regulatory definition because their 'mānuka honey' is naturally low in 2-MAP.

NZ Honey Reference Collection

The MHSSG is currently working through the detail to support development of a comprehensive collection of representative honey samples from all regions of New Zealand.

This collection will be able to be used to assess the extent to which regionality materially affects the regulatory definition being fit for purpose.

4. Protection from Adulteration

It is well documented that the international trade in honey is subject to food fraud. While New Zealand is internationally recognised for its high quality, pure honey (we do not allow honey imports), we are not immune from fraud as identified in a recent prosecution successfully undertaken by MPI.

The regulatory definition does not have strong fraud countermeasures incorporated into its design.

International honey experts have publicly cited their concern that the regulatory definition could be met through the addition of compounds readily available for purchase on the internet. These experts have suggested the regulatory definition should have more robust fraud countermeasures incorporated into the design.

Strengthen Fraud Countermeasures

ApiNZ supports the introduction of fraud countermeasures.

The Honey Reference Collection will enable the assessment of additional technology platforms as a means to detect and prevent fraud.

We also encourage MPI to make this a priority.

5. Enforcement Overseas

The New Zealand regulatory definition can only be enforced where product labelled as mānuka honey is exported from NZ.

While our trading partners may accept the definition for New Zealand exported product, none have adopted the same standard in their jurisdiction so product incorrectly labelled in-market is outside of MPI's reach.

Ideally, our trading partners would adopt and enforce the New Zealand regulatory position,

Gain International Recognition

International recognition will require a joint approach from Industry and MPI whereby the issues outlined in this Submission are addressed, (or show a clear plan to do so) and the definition is applied domestically. That MPI also promotes the enhanced position with counterpart authorities.

As industry we acknowledge not all trading partners will be willing to enforce legal standards on our behalf, and that we will need to work with key laboratories and large retailers to ensure they understand the New Zealand position and our approach to consumer protection.

enabling local authorities to act on our behalf for the benefit of traders and consumers alike.

We note the concerning rise of bulk honey exports which has moved from making up 9% of volumes only a year ago, to 20% and climbing to March 2019. This opens up the very real possibility that bulk honey leaving our shores, either mānuka or non-mānuka, is subject to fraudulent practices in-market. This is a risk to our reputation.

The best countermeasure to prevent fraud resulting from bulk honey exports is to have strong standards and/or regulations in the market. Again, this is likely to be a joint approach and we have asked MPI to do more in this area to work with honey experts and regulatory bodies overseas to encourage support for true to label manuka honey.

6. Domestic Standard

Mānuka honey purchased within New Zealand is not subject to the regulatory definition, meaning local consumers, international tourists sending product off-shore are not afforded the same level of consumer protection as consumers in export markets.

Applying the definition domestically within New Zealand will strengthen our case to have the definition adopted in foreign markets.

Applying consistency

ApiNZ strongly supports the application of the regulatory definition to mānuka honey sold domestically.

We would also urge MPI to align this with how we address the concerns outlined in point 2. so that a domestic standard can benefit from the improvements opportunities already identified.

Conclusion

As outlined in our initial submission of February 2018 *“significant work and investment is required to progress the definition and develop this market.”*

This is highlighted in the table above and while there is a process in place to address some of these issues via the Mānuka Honey Science Steering Group (MHSSG) ongoing effort and with dedicated resources and urgency, is needed.

We also urge Government to revisit our request in our initial submission that *“a comprehensive Economic Impact Assessment needs to be undertaken to accurately inform ongoing decision making relating to this process.”*

Apiculture New Zealand is committed to working with Government on progressing the definition – it is critical if we are to maintain New Zealand's premium position in overseas markets and see continued growth of our export honey industry.