



APICULTURE

NEW ZEALAND

SUBMISSION

TO: Ministry for Primary Industries

FROM: Apiculture New Zealand

SUBMISSION ON: Submission on MPI's Food Safety Strategy 2109 - 2024

DATE: 2 October 2019

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Submission Form

Introduction by NZ Food Safety

New Zealand Food Safety is focused on the future and how it will continue to meet the needs of New Zealanders and the many millions of consumers around the world who buy New Zealand food. Right now significant change is happening across the global food safety system and New Zealand's world-class food safety system must be agile and resilient so it can protect consumers, be trusted by trading partners, support New Zealand food business and continue to underpin our economy.

Your feedback on this draft strategy is crucial to New Zealand Food Safety successfully delivering on its vision: New Zealand food can be trusted by everyone, everywhere.

In particular, we are interested in how you view the things that are rapidly changing our environment – the drivers for change - and how you think the priorities we are proposing for the strategy, will allow us to maintain a robust food safety system.

Once you have completed this form

Email to: newzealandfoodsafetystrategy@mpi.govt.nz

While we prefer email, you can also post your submission to:

A strategy for New Zealand Food Safety
New Zealand Food Safety
PO Box 2526
Wellington 6140
New Zealand

Official Information Act 1982

All submissions are subject to the Official Information Act and can be released (along with personal details of the submitter) under the Act. If you have specific reasons for wanting to have your submission or personal details withheld, please set out your reasons in the submission. MPI will consider those reasons when making any assessment for the release of submissions if requested under the Official Information Act.

Significant changes are happening across the global food safety system and many are happening at speed.

There are pressures on food production, such as food through online channels and app-based platforms, and globalised supply chains introducing a greater potential for food contamination. People are more interested in eating new foods, in new ways and regulators are focussing on consumer expectations while strengthening food safety regimes.

We have identified the following changes that are affecting the food safety system:

- The beginning of the food production process (pressures on natural resources and the impact of climate change)
- How we process our food (complex supply chains and new production methods)
- The demands on the regulator (how we use data and understand our customers' diverse needs)
- Consumers eating different food (changing food preferences and consumption behaviours)
- The international trading environment (desire for international unity in standards and increased trade complexity)

1. These changes will affect how we produce food in New Zealand. Some of the impacts will be positive while others will be undesirable.

How can New Zealand Food Safety work with industry and others to maximise or minimise these effects?

- Utilise research done by others to inform decisions making.
- Repurpose overseas project data so it fits within the New Zealand context.
- Work with industry to share resources and come up with new methods to harness positive changes.
- Work with the science community to harness technology to help minimise the change.
- Other: _____

Please explain why:

To be successful the Strategy needs to deliver strengthened relationships between industry and the regulator (NZ Food Safety), so how the regulator works with industry to share resources and come up with new methods is critical.

While there is research and overseas data available, the resources and time required to make it fit for purpose in New Zealand may not be worth the time. However, there is obviously value in accessing research done by others to inform decision making. In our view, working closely with industry, and with the wider science community (including the Māori science community) we will generate ideas and therefore outcomes that are the most fit for purpose and of the most benefit to New Zealand.

We are proposing to focus on four priority areas to focus our effort in response to these changes. The four priorities are:

- We will ensure New Zealand's world-class food safety system remains robust in responding to future challenges.
- We will proactively support consumers to feel confident making choices about food.
- We will lead new thinking in international forums to expand our international influence.
- We will be an intelligence led business that proactively prepares for the future.

2. Please choose what priorities New Zealand Food Safety should focus on over the next 5 years?

- We will ensure New Zealand's world-class food safety system remains robust in responding to future challenges.
- We will proactively support consumers to feel confident making choices about food.
- We will lead new thinking in international forums to expand our international influence.
- We will be an intelligence led business that proactively prepares for the future.

Please explain why:

These four priorities are all important for the honey industry. Our industry like other food-based industries are increasingly presented with new issues and challenges in the area of food safety, for example, increasing consumer concerns around pesticide residues in food. We need to ensure our food safety system is responsive to future challenges, can respond effectively and in an agile way to ensure ongoing consumer confidence. This must be done in a way that minimises bureaucracy.

It is also up to those in food-related industries to ensure they embrace a food safety culture, one that encompasses practical and relevant training and education, and highlights the importance of food safety. It then becomes a cultural approach of doing it because it is right, not because the regulator requires it.

3. Are there any other priorities that should be considered? Why?

Protection from food fraud/adulteration - given the growing concerns around food fraud, particularly in relation to the premium positioning of New Zealand products within the global market, we need to look at what we can do to build our food defence strategies and retain our reputation for safe food.

There is a need to address skill shortages in food safety. While food scientists and food technicians are on the skills shortage list, there is also a need to boost regulatory and voluntary food safety and quality compliance professionals. Internal auditing skills, external audit preparation, traceability and recall, change management, culture improvement/maintenance are core components of running a successful food business. Adding on modernisation requirements to meet the requirements of our overseas market partners, widens this education gap; vulnerability assessment, mitigation strategy, site security, crisis management/business continuity are either not addressed or not addressed adequately within our education framework in either the trades or university pathways. Those who work in these roles currently must complete educational courses offshore, or get mentorship/training from those with this education.

4. To continue to have a world-class food safety system, it needs to be agile and robust. What gaps should we be looking to close?

- More tailored support for food businesses.
- A better balance between innovation and following the rules.
- Consumers understanding how the rules are set / Rules consumers can understand.
- Fewer rules for food businesses.
- Other: _____

Please explain why:

A growing number of operators in the apiculture industry have become involved in the food and export business and are as a result are relative newcomers in this space. Apiculture New Zealand for that reason has seen a growing number of calls, particularly from smaller businesses/members for support and advice. We believe there is a real gap in access to good support. Additionally, with changes due to international markets or technological and research applications, smaller businesses cannot keep pace. Most of these businesses do not have personnel dedicated to food safety or compliance; they are resource stretched.

See also point 2. Improving our ability to respond to new challenges in a more agile way and without being bogged down in onerous bureaucratic processes.

5. We think the system works best when consumers have the information they need to make informed food choices.

What types of food safety information would you find useful?

- Allergies
- Use by/best before dates
- Safe food practices
- Nutritional value
- Other: _ New Zealand is internationally recognised for its high quality food products, like honey (we do not allow honey imports). Origin of source/country to support traceability purposes will also provide additional confidence for consumers to make informed choices. But this needs to be aligned with well-considered and consumer-tested labelling guidelines that clearly state what it is (ie true to label).

6. As a consumer, how do you want to receive information about food safety?

- Email
- Food shows
- Labels
- Newspapers
- Online (e.g. website)
- Radio
- Social media
- Supermarkets
- Telephone (hotline)
- TV programmes / Advertisements

Please explain why:

Increasingly, our consumers look to online and social media resources to form opinions and gather information, so having a strong online/social media engagement programme is critical. We also acknowledge that consumers should always have access to food information via the label in a way that is clear and does not misrepresent the food produced.

7. Are there any other ways you would want to get information about food safety? Why?

Nationwide text service for major issues; such as we use during natural disasters. A foodborne illness epidemic can have as much, or more of an impact. We need to be able to tap into existing systems in place with Civil Defence.

8. The trading environment is shifting and our role in shaping this helps to safeguard New Zealand's reputation and getting New Zealand food to overseas markets.

What do you think we should do to protect and increase our influence overseas?

- Being part of more international food and science forums.
- Lead international food standard setting.
- Set rules at home that safeguard our food for the world to eat.
- More consistent rules across countries.
- Other: _____

Please explain why:

Our regulator needs to play a more active role in talking with international regulators and key international forums, educating and informing them of New Zealand's food standards and identifying how we can more effectively influence and respond to new food safety issues and trends. Aligned with this is the need to promote those brands that have a strong food safety culture, noting that food safety is wider than one industry; all New Zealand industries stand to sustain international brand damage from a food safety incident and we need to work together to protect our reputation.

We need to modernise our food safety legislation. This has now been instituted in major market partners globally, and with the premium placement New Zealand products command on the world stage, it is prudent to follow this trend, but to take ownership and lead with innovative best practices.

9. Food advances and innovations/technologies affect every part of the food supply chain.

What do you think needs to be done to foster innovation while keeping food safe and suitable?

- More government funding for research and development.
- More information about innovations (e.g. lab-grown meat).
- Different rules for food businesses who provide new food.
- Support and advice for food innovators on how to follow the rules.
- Other: _____

Please explain why:

As outlined in Point 8; New Zealand is a small country with a recognised premium food and brand position on the global stage. It should therefore be possible to have a greater cross-industry partnership approach that will lead to greater innovation. Regulatory support and encouragement will be needed to achieve this.

More funding for research and development is critical to become a world leader. Staying the same is not an option. Today's best practice is tomorrow's minimum standard. If we do not invest in research and development, we will find ourselves left behind on the world stage.

10. Is there anything not in the strategy that should be? Why?

In the vision it states that “New Zealand food can be trusted by everyone everywhere”. In delivering to this vision we need to ensure there is consistency in what we apply to our consumers at home and abroad. This is currently not the case for New Zealand mānuka honey where honey purchased within New Zealand is not subject to the regulatory definition, meaning local consumers and international tourists sending product off-shore are not afforded the same level of consumer protection as consumers in export markets.

General comments

If you have any general comments or suggestions, please let us know.

For example: thoughts on the strategy including reasons for your views, any changes you would suggest and why.

Apiculture New Zealand welcomes the opportunity for a joint strategy with NZ Food Safety to enable our industry to realise its potential. For mānuka honey, for example, we have a great foundation to work from, but we also recognise the need to do more. Success will come from a combination of:

1. A robust regulatory framework to protect the consumer, market access, and NZ Inc.
2. An industry-led, government-recognised quality framework to support and promote mānuka honey in international markets
3. Investment in fundamental science to support the consumer’s reason to believe – i.e. build on the evidence supporting health benefits even if we can’t make claims on pack
4. Protecting the term mānuka honey
5. Protecting the investment necessary to grow the industry sustainably: legal protection for nectar resource allocations (especially plantations), GIA (or similar) to deal proactively with the next incursion

The development of other native honey types will also benefit from investment in the above – they are further behind in their development compared with mānuka honey. Collectively we have a genuine opportunity to create value and take a joint approach to promoting New Zealand as the best place in the world from which to buy high quality honey and bee products.