



APICULTURE
NEW ZEALAND

17 January 2024

Food Standards Australia New Zealand
PO Box 10559
WELLINGTON
NEW ZEALAND
Via email: submissions@foodstandards.gov.au

Tēnā koe

Re: Submission on Australian Native Bee Honey – Application A1257

Thank you for the opportunity to submit on the application by the Australian Native Bee Association to amend the Australia New Zealand Food Standards Code to accept honey produced by Australian stingless bees as a “standardised food in Australia and New Zealand”.

We are supportive of the direction that supports traditional food types like native bee honey. We do have a number of concerns as outlined below:

1. Biosecurity restrictions around the import of honeys into New Zealand would need to apply to the native bee honey. It is our understanding that native bees can be a vector for diseases like European Foulbrood (which is present in Australia but not New Zealand). For that reason we ask that FSANZ clarify the position that native bee honey from Australia cannot be sold in New Zealand.
2. Recognising traditional knowledge and cultural practices needs to be applied consistently. In the supporting documents on page 3, FSANZ outlines the “growing recognition and appreciation for traditional knowledge and cultural practices of the Aboriginal and Torres Strait Islander peoples related to honeys and native bees” and FSANZ’s appreciation of this traditional knowledge. Yet in the immediate paragraph above it talks about “the various regions in Australia becoming known for their **unique honey varieties such as eucalyptus, macadamia and manuka honey.**” Given that mānuka is a Māori word (from New Zealand’s indigenous people) and that mānuka is a taonga species exclusively from Aotearoa New Zealand, it is disingenuous for FSANZ to claim manuka honey is unique to Australia and we ask that this reference be removed.

3. We note that FSANZ did not include the potential contamination of *Bacillus cereus* and other *Bacillus spp.* and its consequences in their microbiological safety assessment. *Bacillus cereus* and other *Bacillus spp.* are pathogens and two types of foodborne illness, vomiting or diarrhoea, are associated with *B. cereus*. We think this risk is worth considering given the native bee honey has a higher moisture content (26.5 +/- 0.8 g of water/100 g of honey) and water activity (0.74 +/- 0.01) when compared to *A. mellifera* honey.

We are pleased to see FSANZ proposes a specific compositional standard for trehalulose content to prevent fraud for the native bee honey. This sets a helpful precedent for other honeys and we would like to work with FSANZ to develop a similar joint standard to prevent fraud with mānuka honey. We ask that this is put on FSANZ's work programme agenda.

Apiculture New Zealand

Apiculture New Zealand (ApiNZ) is the national body representing the apiculture industry in New Zealand. It covers the full range of sectors, from hobbyist and commercial beekeepers to honey exporters, packers and suppliers. ApiNZ aims to support and deliver benefits to the New Zealand apiculture industry by supporting a thriving long-term future for New Zealand honeybee products and services, including having a strong bee health and biosecurity position.

We would be happy to answer any questions you may have.

Ngā mihi nui



Karin Kos
Chief Executive
Apiculture New Zealand