

**November 2017 Submissions on the proposed  
Operational Code Processing of Bee Products**

15 December 2017

MPI received 3 submissions on the proposal Code. The submissions have been analysed in the following table. As a result of the consultation process, and where appropriate based on the analysis below, amendments has been made to the Code. MPI would like to thank the parties who have taken the opportunity to comment on the revised Code.

Points MPI would like feedback on			MPI Response
1.	Is the level of detail appropriate for the bee products sector?	<p>There is too much detail with several areas of overlap, written in different ways. The inclusion of additional sections – eg waste and storage although written relevant to the section heading are covered elsewhere in Cleaning, Pests, or Packaging. This then becomes a duplication of written compliance documentation for operators.</p> <p>Probable too much for the one man / family operator</p>	<p>Parts such as waste and storage provide the information on how these processes are managed rather than being mentioned in relevant places within the Code.</p> <p>The Code needs to cover most types of processing for an RMP and where clauses do not apply eg calibration of critical equipment, then the operator will not be expected to meet that requirement.</p>
2.	Are the technical aspects correct?	Yes mostly	Noted.
3.	Are the procedures practical and achievable?	Where smaller owner/operators are only processing for 3-4months of the year, the practicality of maintaining written programs for 6mthly audits is not practical and difficult for operators to achieve.	<p>Noted.</p> <p>6 monthly audit frequency is out of scope of this consultation.</p>

Points MPI would like feedback on		MPI Response	
		<p>Owner/Operators also being required to develop and implement written additional documentation over and above the COP appears onerous and non-productive to the requirement of 'fit for purpose'</p> <p>Some are missing but not necessarily as to add them just give the verifiers something else to pick on.</p>	<p>Noted. There are some additional procedures that an operator may need to develop to manage risk and meet regulatory requirements. MPI has developed a generic set of forms and procedures that will assist operators and will be published on the website.</p>
4.	<p>Are there any areas that need more guidance?</p>	<p>"Purpose (1) This Code has been developed to provide guidance for meeting the requirements for the development, registration and implementation of a risk management programme (RMP)." Whilst the guidance information is helpful, of concern is the confusion between processors and verifiers of what is a mandatory requirement. Mandatory requirements listed specifically in the current Bee COP provide clarity and should be carried forward into the proposed COP.</p>	<p>Feedback from stakeholders, including from surveys, indicated there is a lack of clarity on what is required and what is guidance. Thus the draft proposed Code uses the rule of "must" for requirements and "should" for guidance to avoid confusion in this type of document. Mandatory requirements in the current Code are out of date and thus needed revision.</p>
5.	<p>Should the detailed calibration information be kept as an appendix or as a separate document?</p>	<p>Calibration is a guidance only and should not be an Appendix that may suggest operators 'must' comply. Too much detail here that is not a CCP for bee products.  Most of the calibration is not necessary for small operations extracting honey. You soon learn to</p>	<p>Noted. However there are some operators who do need to calibrate equipment for critical measurements. The calibration appendix has been moved to the about-to-be published toolkit of resources for RMP operators.</p>

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		adjust thermostats on water heaters the control the heat exchange and further monitoring is not necessary. These are never changed. The flow of honey through the heat exchange also control the temperature the honey comes out at
6.	Should the Pre-Season Checklist order of topics match the order of the revised Code?	<p>Referring to this draft Bee COP - "This document replaces the MPI Code of Practice: Processing of Bee Products Parts 1-5, 2005-6."</p> <p>The draft Bee COP should be an amendment of the current Bee Products Code of Practice which would then allow continuity of numbering. This will allow systems already in place to continue. It is also noted the wording is exactly the same in some sections. This would retain the status quo for The Pre-season Checklist. (with some minor numbering amendments)</p> <p>Yes</p>
7.	What additional secondary processes for bee products need to be included in the Code?	MPI intends to include more bee product processes e.g. royal jelly, venom, etc. in the next version of the Code.
8.	What additional RMP templates for bee products need to be developed?	MPI intends to include more bee product into templates e.g. royal jelly, venom, etc. in the next version of the Code.

## Operational Code Comments

Clause	Comment	Proposed amendment	MPI Response
Intro (3)	<p>Introduction. Who in the industry did you consult with?</p> <p>If it was the PBSC, then they have no knowledge of small one- man operations. You have to go wider in you consultations.</p> <p>Please note that the honey industry has changed and now corporates are involved in beekeeping, extracting, packing and exporting. These corporates get 300% more money for their finished product than the small operator who sells it to them. They can afford a person to devote their time and energy to documenting all procedures. Small operators follow the RMP manual and tick the box that this has been done. We do not need to write a procedures explain how we do each check or how it's done. Just follow the guide lines.</p> <p>It should be simple and easy to do. As more is put into this revised code, more time and stress is being put on small operators but this does not effect the finished product. I suggest this code is written for corporate business because they need it with their constantly changing staff. This is way over the top for small operators who either do not employ staff or have a staff member who is mostly used in the field but assists in the plant during extraction.</p> <p>You need a section that says for big business this is the code. For family and one man operations and those working under the Food Act, parts are for guidance only. Now sort out</p>	<p>Get out of the office and talk to some of the very good family run beekeeping operations who extract their own honey under the RMP system. Go through the pre-audit audit procedure and see how long it takes you. Take a look at the effect the two audits a year policy is having and the madness and frustration this is causing to small businesses. Some audits are only three months apart. (these are not the load in and load out audits. These audits are meant to be 6 monthly. What difference are they seeing when the total crop is sold to one packer all at once and the plant is moth balled.</p> <p>Verifiers are now verifying anything from the document. Asking for documentation on procedures on how you produced the documentation is ridiculous. Beekeepers used the original document as their base. Verifiers are now taking beekeepers away from the document and asking beekeepers to write their own documentation. When they already have 10 folders of procedures required to have an RPM and produce honey that is always under 200 CFU's (packers check this for them). It's creating extra layers of paper work.</p> <p>During the last audit the wife of a small operation was in tears at what is now required by that verifier, having gone through the document and verified everything. She had a spread sheet and ticked the boxes that each had been done. The verifier wanted documentation of how each task had been</p>	<p>Noted.</p> <p>The audit frequency and verification is out of scope of this consultation.</p> <p>Consultation is one of a spectrum of methods that has been used to consult with industry including publishing this draft Code on the MPI website (for 6 weeks) for feedback, premises visits, etc.</p>

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	<p>which is which instead of imposing everything on everybody no matter what the size without considering the risk.</p> <p>Beekeepers have for years put in submission but NZFSA don't take any notice of suggestion and just ram through their proposals (one the Monday after submission closed on the Friday) so now most now don't bother.</p> <p>You need a cultural change and start working with the industry, not only the BPSC. Get out there and try out what you suggest practically to gauge the implications, make amendments where necessary and then the industry will respect you.</p>	<p>done. The verifiers just keep looking to produce an NC to validate their existence. NZFSA needs to review this audit policy of two per year and adopt a BEEQUAL policy in that you audit until you are satisfied that the production of extracting is safe and the honey fit for purpose and then audit on a two year basis or unless some shows up that requires a recall.</p> <p>You have to be very careful on where you put things. There are a number of "musts" but anything above a must needs to be guidance only as verifies now nit-pick.</p> <p>Masterton Community centre provided a community service in the form of a registered kitchen. Its beautifully set out with fire blankets and all, but they have cancelled the registration as the cost and audits fees are more than a community centre can afford.</p> <p>You must ask yourself "have you gone too far?" Look at this document and ask yourself is this all necessary ( a "must") if you were a beekeeper working under the Food Act for a couple of days extraction so you can sell locally.</p> <p>Honey is preserved as a safe food. Target non-compliance but cut back on those that are compliant.</p>	
Bkgrd (4)	<p>A hobbyist extracting for local sale will only use the cleaning requirements and what ever the Local Council stipulates, (if they are approving and verifying the area for honey processing). Generally, extracting is done in a commercial kitchen.</p>		<p>Wording "where relevant to their operation" has been included.</p>

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Bkgrd (6)	<p>NZ requirements only. You should also be working with the Australian Beekeeping Industries DPI. Tocal College with the Assistance of NSW DPI and Capilano Honey have recently published an AgGuide: A Practical Handbook, Honey harvesting and Extracting. Far easier to read and less complicated. Full of pictures so its easy to follow. (You have Referred to on page 34). Your documents are getting too complicated and wordy for a safe product. If the honey is not extracted under hygiene systems, its will be rejected by the buyer or packer.</p>		Noted.
Why important? (4)	<p>“intended as a guide”. Bold this please as verifiers seem to pick out everything and instead of just the MUST parts.</p>	Bold intended as a guide	Noted. The Code is a guide unless the RMP operator incorporates part(s) of the Code in their RMP. Where operators do not do this they need to use a template (described in (4)) or use alternative approaches as described in (5).
Export? (1)	<p>Second line, APA. Don't use acronyms in the introduction section. Maybe the definitions 1.4 should come further to the front of the document. Somebody reading this for the first time won't know what you are talking about</p>	Move definitions to the front of the document as is done with legislation	The term ‘APA’ was defined earlier in the Introduction as the Animal Products Act 1999 (APA). Using a title in full with its abbreviation in brackets the first time and thereafter the abbreviation is used is common practice in writing documents.
1.2	<p>FSC Australia New Zealand Food Standards Code The common abbreviation in documents for Australia New Zealand Food Standards Code is FSANZ. FSC is the abbreviation for ‘Food Standards Code’ in the Food Act.</p>	Amend for consistency to relevant Code.	Agreed and FSC has been amended to ‘Food Standards Code’ to align with the Food Act.

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1.3.2	<p>c) water treatment - if applicable. We are under council control. Verifier AsureQuality wanted certificates, after trying to get copies and failing, I said your organisation does the testing, you get them. Totally unnecessary.</p> <p>e) wound dressing. Totally unnecessary. Anything bleeding means you stop work or cover with a glove.</p> <p>l) calibration of equipment. Scales for local sales is the only one necessary for a small operator. Everything else, document; weight - estimate only. Asking for the calibration of scales when its done by a certified company is just a waste of money. They put their certification tag and date it so that should be enough.</p> <p>This guide is written for the big operation and not for the single man operation.</p> <p>r) what chemicals do you mix into Honey?</p>	Add something to make this clear who this is directed at.	Written procedures are 'as appropriate' and thus the list given, with the <u>examples</u> apply only 'as appropriate'.
1.4 definition monitoring	<p>Monitoring temperature, PH. This is honey we are dealing with not meat. Too high and its burnt and nobody will buy it. We do not check the PH. The bees do it. Put in something relevant to honey.</p> <p>Monitoring records. Again written for a big business ADD WHERE APPLICABLE</p> <p>For one man operation we do not check the strength of chemical or measure the correct times. What is important is the washing down after to remove chemical traces.</p> <p>Chemical are either fit for purpose or its incorrectly classified by MPI. There are non-toxic cleaning methods. Such as cleaning with high pressure units as done in Australia. No</p>	Use the manufactures recommendations.	Agreed and amended to read 'moisture'.

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	chemicals are used in the extracting plant. They just need to be clean.		
2.1.4	Rather than referencing the 'shelf-life' of the product as honey does not have a shelf-life requirement.	Replace with 'until the product is sold'.	Honey is generally considered shelf-stable however a shelf life can be stated but this is usually around quality than food safety. Records should be kept longer than when the product was sold in case there are any issues about the product which is not discovered until it is consumed. This is a legislative requirement in the RMP Specifications Notice.
2.2.3 (5)	Availability of mobile phones for emergency use in the processing areas is acceptable. Energy (sweets) boosting maybe required in the processing area. Smoking would be referenced in employer/employee contract or signage? Refer 11(b) Several references duplication and unnecessary: (5), (11) and (13)	Remove	Agreed and amended 5 for 'personal items for personal uses as appropriate'. Agreed and removed clauses 11 and 13.
2.2.3(6)	Hand sanitiser and water. My son works in a hospital and tested washing methods, hands sanitiser doesn't work as well as soap and water. If the sanitiser is not washed off three times, its gets into the honey and by the end of the day, can be measured especially if an anti bacterial chemical is in the sanitiser. Result if picked up overseas = NZ is using anti-bacterial agents in it's beekeeping.		Agreed and this has been amended.
2.2.3 Guidance	OK to have waterproof footwear as its easy to clean, but honey is hygroscopic and therefore having water on the floor is the best way to		Some operators do clean with water/steam.

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	<p>introduce moisture into your honey. Floors should be dry.</p> <p>I and some other beekeepers do not recommend gloves. The person wearing gloves is not aware they are sticky and honey therefore tends to go everywhere they put their hands. I rinse off my hands with every extractor load.</p> <p>Gloves are only use when using chemicals for cleaning or for a blood injury.</p>		Agreed and the use of gloves for mixing chemicals has been used as an example in the guidance box.
2.2.3(11)	<p>As above some duplication here.</p> <p>Maybe confusion where prohibit a) eating of food; referenced when tasting of honey is a necessity in the processing area. It is noted that tasting of honey has a guidance reference.</p>	Remove	Agreed and removed (as above).
2.3.2	<p>This is Job description relevant to Employee/Employer requirements.</p> <p>Upskilling is not a requirement of the description.</p>	Remove Upskilling reference.	This is guidance and upskilling should be part of a job description and good business practice.
3.1.2	<p>Compliance for Council Building Construction Requirements is not process for a Code of Practice relevant to bee products being 'fit for purpose'.</p>	Remove	This list is to assist operators to be aware of other NZ legislative requirements when they are designing and building a new premises. However this list has been summarised.
3.1.4	<p>Organise flows.</p> <p>Depends upon room. We operate from a basement. Everything to be extracted that day is in the extracting room and remains there until the end of the day (dusk) when its loaded to go out the next day. We do this to stop robber bees causing a problem in the neighbourhood.</p>	<p>Think about the single operator requirement. We are not going to spend \$400,000 on a building to do three week work each year.</p> <p>Make this guidance</p> <p>This means there should be less stringent requirements for a single operator running under the Food Act.</p>	<p>If you were setting up a new premises, no matter how big or small, process flow needs to be considered. The verifier would expect to see how you manage this. From what you describe it sounds like you are.</p> <p>This Code is for the RMP operator under the APA and is not a requirement for those operating under the Food Act.</p>

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	<p>There are very good reasons to set up your own extracting plant. First is timing – you extract when you want to, no waiting in line, you get all the honey and wax back not just full drums.</p> <p>You control the whole process. No reliance on others who may not be selective on what is extracted and when.</p> <p>You can sort honeys by type and not just get a blend back.</p> <p>In the event of a biosecurity incursion i.e. small hive beetle. Only those with refrigeration units will be able to control this pest. Honey frames can become contaminated with slime within four days and therefore rejected.</p>		
3.2.6(2)	<p>Floors graded. We wash the floors and water-blast rubber mats at the completion of a days extracting. A sloping floor helps but is not necessary. Ever heard of a wet and dry vacuum cleaner and a dehumidifier? Everything is clean and dry by morning.</p>	Guide only	Agreed and amended.
3.5.2	<p>Guidance, dot point 6</p> <p>Brass pumps have been used in beekeeping for years. Someone had honey tested before and after it came out of a brass pump by the Corthorn Institute and not residue was detected.</p> <p>A brass pumps is the only pump that can clear a line of a blockage I.E We pump a slurry of honey and cappings to a spinner. If the rubber impeller pump can't push the slurry through, the brass one can eliminating the need to stop</p>	I understand copper but to exclude brass is a nonsense. Provide evidence please if this statement is to stay in the document.	This is guidance. If you have brass you should be managing the use of brass e.g. checking for corrosion as part of your repairs and maintenance.

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	<p>the extraction, drain the lines and clear the obstruction; (wax build up).</p> <p>Why is brass used on ship's propellers where other allows all corrode in the salt water.</p> <p>Just a point. Hospitals in the USA are going back to copper for trolleys and taps as copper is antibacterial. SS harbours pathogens where as copper make then sterile, however copper requires more cleaning.</p> <p>Dot point 7 new equipment</p> <p>Dot point 8 - readily cleaned. What about the use of costic soda?</p> <p>That will get anything out of SS pipe.</p>	<p>Other than Stainless steel. Most equipment now comes from manufactures that supply food industry equipment to the beekeeping industry.</p> <p>All that is required that it be certified food grade by the manufacturer and only then when its not SS 403.</p>	
3.5.3	<p>Personal hygiene equipment</p> <p>b) non hand operated. This is the ideal if installing a new plant, but is not necessary for existing establishments.</p> <p>If somebody is not cleaning hands and equipment it soon shows in the CFU count. If just requires common sense cleaning.</p> <p>IE Sanitise the taps and basin before use.</p> <p>4) Air dryers come with the tap assemblies that are electronic sensor operations for water and air drying. What is really important is the time hands are scrubbed to remove contaminates and bacteria.</p> <p>The processing / extracting room is 20 metres by 20 metres in one factory I have seen and this shouldn't be by the door?</p> <p>Put out a hand washing guide – you must have one somewhere.</p>	<p>Use as a guide only, Training: hands must be thoroughly dry if air dryers are used.</p> 	<p>Agreed and amended by moving 'non-hand operable (e.g. foot, knee, sensor) taps for hand washing' into the guidance box.</p> <p>Sanitising taps and basins has been added into guidance as well.</p>

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4.5.5		Add e) work within the health and safety guidelines set out by the operator.	Disagree. This Code is about food safety and suitability not health and safety.
5.1.10	<p>“Guidance - Wipe with wet cloths or hose down external surfaces of equipment as necessary” is acceptable however the inclusion of cleaning agents or sanitise when cleaning pricker/loosener, uncapper, extractor, sump, conveyors is not acceptable.</p> <p>Guidance documents are helpful but sometimes the notes outside the ‘guidance box’ become must do.</p>	Remove cleaning agents or sanitise to avoid confusion or misunderstandings here.	Agreed and amended by removing ‘cleaning agents or sanitise’.
6.1.2	<p>Implement a written procedure for sourcing and purchasing.</p> <p>Pick up the phone, call the distributor, confirm items available, write out an order or email off to distributor asking for food grade assurance letter, pick up and inspect on arrival, record in. Is this really necessary for a single operator? Are you just creating work for a verifier.</p>	<p>Put this in a guide box.</p> <p>Please show where this procedure would work and why do you need it for a single operator. We can only purchase from one or two companies because we are not buying in bulk (10,000 or more). Labels are put on after packing.</p> <p>Put as a guide.</p>	For an RMP you need to confirm that the materials that are used are appropriate for use using (approved) suppliers. From what you describe it sounds like you are.
6.1.3	Dot points 3 and 4 in the guide are not appropriate for honey.	Delete or rewrite to show where appropriate	Agreed and re-worded.
6.1.4	<p>This clause needs clarity.</p> <p>Food Standard Tustin Guide 2016 reads “Standard: Tustin in Honey. The standard has been developed to ensure that dangerous levels of tustin do not occur in honey sold in New Zealand or exported”</p> <p>The COP should read ‘all honey must comply’</p>	All references to Tustin need clarity.	Agreed and amended.
6.1.5 (3)	NZ Beekeeping is not aware of ‘verifiable evidence’ that the beekeeper could provide to indicate that the appropriate	Operator must ensure that all sections of the Harvest Declaration are completed and is signed by the beekeeper/apiarist.	Agreed amended to read that verifiers check the verifiable evidence.

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	<p>beekeeper/apiarist is in full compliance with the AFB PMP.</p> <p>NZ Beekeeping does not believe it is appropriate the operator should ensure that verifiable evidence of compliance is included in the harvest declaration because it does not appear such a document exists.</p>	<p>Remove clause 6.1.5 (3) b).</p>	
<p>6.1.3 (5)+</p>	<p>Verifiable evidence is in compliance.</p> <p>All it is is a tick on a legal document. The operator of the RMP cannot verify if hives were burnt in seven days, all apiaries are registered unless he does the work himself.</p>	<p>Delete verifiable evidence.</p> <p>Substitute that all appropriate sections on the form are completed including compliance under the biosecurity act.</p> <p>That's all a secondary processor can do. What you need to do is make this an electronic document so honey fraud can be picked up. (i.e. a beekeeper can take honey to different processors using the same apiary code number. (Code because you don't want to let other beekeepers know your best sites.)</p>	<p>Noted. Developing an electronic harvest declaration is out of scope of this consultation.</p>
<p>6.1.5 (4)</p>	<p>last sentence in the guide at the top of the page</p>	<p>Delete this sentence as its against the law to have an unregistered apiary. You do not knowingly extract honey from unregistered beekeepers or apiary sites.</p>	<p>It is important to mention this to ensure operators are aware and prevent extracting honey from unregistered beekeepers.</p>
<p>6.3.5</p>	<p>Guidance. Bungs should be sealed with a cap to indicated the product hasn't been interfered with. I.E. It hasn't be contaminated since packing.</p> <p>Washing and drying – a hot air gun (specifically for use in the extracting room and drying drums) is far easier and quicker to use. Much cheaper than heating a hot room to 50 C+</p>	<p>Add this as a guide.</p> <p>That part of the guide is not applicable to small operator when only one or two drums are required.</p>	<p>Agreed and amended by adding these points into the guidance box.</p>

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6.4.45 & 6.5.1	We only get sealed cartons, no batch number as these do not come direct from the manufacturer We do not use most of this equipment.	May not be applicable to small operators	Amended to read 'as appropriate'. If the operator does not have any critical measurements and hence no equipment that needs calibrating then this clause does not apply.
6.8.2.2	This is not a requirement for RMP's – Varroa treatments are not used in a RMP premises	Remove this clause	It has been known that treatment strips have been present in honey received at RMP premises.
6.8.2.3 (5)	Regularly check bait stations. Note we check these months. Verifiers have NC's some beekeeper for not checking every 30 days when we state monthly; E.G. first of the month.	Leaving the word regularly is good as the operator is responsible for when these are checked. Some verifiers put their own interpretation on regularly.	Noted.
6.9.4	Guidance - last two points Freezing to control wax moth. Is an ecert required if the comb honey boxes are removed and transported to a freezer before coming to the RMP premises? Honey does not granulate in new comb so the actual packaging can be delays until a market is found. If the price is not right, the honey can be extracted.		Freezing prior to entering an RMP premises is considered pre-secondary processing i.e. pre-RMP and does not require an Ecert.
6.10.3	Freezing at -18C for 48 hours is slightly long. The Hive and the Honey Bee Page 865 states -15C for 24 hours kills all stages of wax moth. Wax moth do not survive in the southern half of the Island, normal winter chilling kills wax moth,	A household freezer -18C will kill all stages of wax moth within 24 hours.	This is guidance. If you have an alternative way of meeting the same outcome then this would be acceptable.
6.13.8 e)	Temperature monitoring is not required for some products. Power and temperature alarms are all that is required which alerts the operator when the power to a thermostat failure.	After records, add on "or alarms;"	MPI expects confirmation of temperatures where they are critical temperatures.
Figure 1	Modify flow chart. Test representative sample is in the wrong place. No then test, either complies, yes to processing, not to blending	Explanation. You cannot determine tutin is in a particular part of a comb so the batch of honey	This guidance flow chart is about making decisions rather than following a specific

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	(Blending needs a huge amount of honey and is not available option to a small producer.  Arrow from option 2,3,4 goes to the wrong place	has to be extracted and stirred before a sample is taken for testing.  Arrow should be going to processing as its know there is an absence of tutin.	manufacturing process. MPI believes this is representative of the decision process. The Guidance Document: Compliance Guide to the Food Standard: Tutin in honey allows for sampling of comb honey and for it to be extracted and homogenised (not blended) for combined drip and imperfectly filled combs as a 'lot' with a maximum level of 0.01 mg/kg of tutin. This limit allows for the challenging nature of obtaining a 'representative sample'.
7.2.2 Table 7	Note: a small producers pack bulk honey for sale. People prefer this as it has more floral flavour having not been processed twice.	Hasn't been heater but may be creamed or liquid but will granulate	This flowchart is generic and not all steps may be applicable or managed as described. It is guidance.
7.2.2 Table 7 Note 4	Risk from agricultural chemical (pesticides and herbicides)	This statement is irrelevant as both these chemical kill bees, (herbicides contain surfactants that kill bees) so generally nectar from these bees doesn't get into the hive,.or the hive is completely dead.	Herbicides such as glyphosate are known to be found in honey as a result of application to "kill grass before a paddock is ploughed" as described below. Also pesticides can enter honey eg Amitraz from varroa treatments.
7.2.3 Figure 2	We have an Australian extracting plant. Honey and wax cappings from the uncapper are pumped together and mixed with the output from the extractor and then pumped into the wax honey separator. As per the AgGuide page 93	The Australians produced a better design of flow chart.	Noted.
Table 7 Note 2	Notes 2 bacterial spores particularly those of bacillus genus	We don't have anthrax and bacillus spores should be in honey as its illegal to extract honey from a AFB hive. The commonly held view that there a bacillus spores in all hives has been proved false due to finding of the MPI pathogens programme. Perhaps this statement should actually define what is being found, as a general statement is misleading and perhaps promoting a myth.	Bacillus is endemic in the environment.

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Table 7 Note 3	Result of bees gathering honeydew excluded from sap sucking insects	This statement is blatantly untrue as proved by MPI research but continued in documentation as its an easy statement to carry forward. The actual toxin is gathered from the puncture wounds made by the scolipopa and not their excursion which is 120 times less toxic. NZFSA have told me that they would need to change the regulation to correct this statement and that too much trouble. Not a very good excuse as everything should be science based. Rewire to you are not persisting with an untruth.	<p>“Toxic honey is produced in New Zealand when honey bees (<i>Apis mellifera</i>) forage on honeydew containing the phytotoxin tutin that is produced by the passion vine hopper (<i>Scolypopa australis</i>) when feeding on the poisonous plant tutu (<i>Coriaria arborea</i>)” - from the NZ Journal of Crop and Horticultural Science article:  <a href="http://www.tandfonline.com/doi/abs/10.1080/01140671003781702">http://www.tandfonline.com/doi/abs/10.1080/01140671003781702</a></p> <p>ie the bees produce toxic honey from the honeydew excreted by the hopper. Furthermore it’s widely accepted that the conditions for tutin poisoning require tutu + scolypopa + bees. When the bees collect the honeydew, they may well collect sap from the ‘puncture wounds’ but the outcome is the same.</p>
Table 8 1. Receiving	Receiving C – Chemicals natural weed killers etc. Can you please specify what proof you have for making this statement. I.E. Residue testing programme - we never see the results from this testing. What is actually being found in NZ honey? The industry should know so they can try and eliminate the problem if it is a problem.	<p>This is very important. If weed killers are getting into honey it can only be by beekeeper spraying grass around the hives. If this is the case then best practice would mean that the grass be cut instead of sprayed. (as per notes on page 106)</p> <p>An other sources is from water as is the case in most of Europe and the USA with Glyphosate now being found in honey. This chemical is being used now to kill grass before a paddock is ploughed. Means that the used of the chemical should be modified to be used only in the early morning or evening when bees cease flying.</p> <p>The Australian statement on page 92 is more accurate I feel.</p>	<p>Reports on chemical residues (New Zealand National Chemical Residues Programme Report) including honey are located on the <a href="#">MPI website</a> or search on ‘chemical residues programme’ for the Documents for NCRP.</p>

Clause	Comment	Proposed amendment	MPI Response
Table 8 3. Deboxing	Good practice would see no bees or squashed bees coming in on combs. Use of blowers, chemical fumigant and escape boards prevent this. No bees come into our honey room with honey boxes. Not the case with some big plants were bee excrement is all over the walls.	Good practices start in the field. Australia only use escape boards and honey supers must be covered during transporting.	Field practice is not in scope of this Code.
Table 8 4. Uncapping	Justification	Consider adding brood and pollen.	Agreed and added in.
Table 8 6. Extraction	P foreign objects. These cause more problems to the equipment, ie pumps, etc and only get into honey if honey is pumped straight into a settle tank and the honey drummed straight off the bottom.	Normal NZ practise is that they are taken out at the wax separation process. Coment a good table.	Noted.
8.2	Fermented honey Nobody I know has wet equipment when the start processing Water in the extraction room is a possible cause so is a wet season or taking honey off in the rain	Control. Measure honey samples directly from the comb to determine if drying is necessary. Its much easier to remove moisture from honey while its still in the comb. Much harder when extracted.	Agreed and added into guidance table in 8.2.
Appendix 2 3	Facilities and equipment this question then leads to hazard control point changes changes in documentation, proceedures etc.	Add question. Has the extraction set-up been modified or changed in any way no – no action required Yes action required	Agreed and added in.
	Once again MPI has asked for beekeepers to comment on a very important document during their busy season. From August to March beekeepers are working hives so they can gain an income for the year. I have talked to a number of commercial beekeepers about this document and they	If you put out documents for comment from April to July, you will get the attention of the industry members.	This proposed draft is a revision of the current Code of Practice and MPI is also asking questions such as what other processes or products need to be included in the Code. There will be at least one further opportunity to comment on the Code when MPI will consult on another version with more processes or products. This would be expected in 2018.

Clause	Comment	Proposed amendment	MPI Response
	have told me that they are just too busy to look at the document. How are you going to get positive feed back when hardly anyone has looked at it.		