Submission Form

Mānuka honey sold in New Zealand: is further regulation needed?

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| **Once you have completed this form**  Email to: [Manuka.Honey@mpi.govt.nz](mailto:Manuka.Honey@mpi.govt.nz)  While we prefer email, you can also post your submission to:  Consultation: Mānuka honey sold in New Zealand: is further regulation needed?  Ministry for Primary Industries  PO Box 2526  Wellington 6140 |

**Submissions must be received no later than 5pm, Monday 17 September 2018.**

Consultation will run for eight weeks, from Monday 23 July to Monday 17 September 2018.

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

Please make sure you include the following information in your submission:

* your name;
* your contact details (e.g. phone number, postal address and email);
* your organisation’s name (if you are submitting on behalf of an organisation);
* your position within your organisation (if applicable);
* the size of your organisation (if you are submitting on behalf of an organisation);
* your thoughts on the proposals, including reasons for your views;
* the possible impacts of these proposals on you or your businesses; and
* any changes you would suggest to these proposals and why.

For answers to any questions you have about this consultation, please email [Manuka.Honey@mpi.govt.nz](mailto:Manuka.Honey@mpi.govt.nz) or telephone: 0800 00 83 33.

Disclaimer

While every effort has been made to ensure the information in this publication is accurate, the   
Ministry for Primary Industries does not accept any responsibility or liability for error of fact, omission, interpretation or opinion that may be present, nor for the consequences of any decisions based on this information.

## Your feedback is public information

Any submission you make becomes public information. Anyone can ask for copies of all submissions under the Official Information Act 1982 (OIA). The OIA says we must make the information available unless there is a good reason for withholding it. You can find those grounds in sections 6 and 9 of the OIA.

Tell us if you think there are grounds to withhold specific information in your submission. Reasons might include that it is commercially sensitive or personal information. Any decision the MPI makes to withhold information can, however, be reviewed by the Ombudsman, who may require the information be released.

**Scope**

The purpose of this consultation is limited to the domestic purchase and sale of New Zealand mānuka honey, and how New Zealand mānuka honey sold domestically should be regulated. The rules and requirements would apply to New Zealand businesses producing New Zealand mānuka honey and would not apply to businesses outside New Zealand.

We appreciate that there are a wide range of issues surrounding mānuka honey that interest the public, stakeholders and industry. Should we receive opinions about (but not limited to) non-mānuka honey, tutin, biosecurity, data, traceability, the General Export Requirements for Bee Products (the GREX), the New Zealand mānuka honey science definition, trademarks, and so on, they will be forwarded on to the appropriate parts of MPI to be considered.

**Submitter details:**

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| Name of submitter  or contact person: |  |
| Postal address: |  |
| Phone number: |  |
| Email address: |  |
| Your organisation’s name (if you are submitting on behalf of an organisation): |  |
| Your position within your organisation if applicable: |  |
| The size and location of your organisation (if you are submitting on behalf of an organisation); |  |
| What region of New Zealand are you located? (select by clicking on the appropriate box) | |  |  | | --- | --- | | Auckland | Wellington | | Gisborne | Canterbury | | Marlborough | Manawatu-Wanganui | | Southland | Otago | | Waikato | Tasman-Nelson | | Bay of Plenty | West Coast | | Hawke’s Bay |  | | Northland |  | | Taranaki |  | |
| Are you:  (please select those that apply to you) | |  |  | | --- | --- | | a **consumer** |  | | Do you purchase mānuka honey?  Yes, all the time  Yes, sometimes  No | | | an **organisation** |  | | Please tell us who you are or who you represent? (type below) | | | How many members you represent? (type below) | | | a **business** |  | | a. What part of the supply chain do you operate in (please select all that apply): | | | beekeeper  extractor  processor  packer  exporter  retailer of bee products  other – please specify (type below): | | | How long have you been involved in the apiculture industry: | | | 0-5 years  5-10 years  10+ years  not applicable | | | Do you operate under: | | | an RMP under the Animal Products Act 1999  the Food Act 2014 (Food Control Plan or National Programme)  none of these  not applicable | | | 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 | | | If you are a business, how many people work in your business (full time or part time, including owner-operators)? | | | 0-5  6-9  10-19  20 or more | | | How much mānuka honey do you produce or sell each year (approximately)? | | | 0-50 kg  50-100 kg  100-500 kg  500-1000 kg  1000-5000 kg  5000+ kg  not applicable | | | If you do produce or sell mānuka honey, how much do you produce for or sell on the domestic market each year (approximately)? | | | 0-50 kg  50-100 kg  100–500 kg  500–1000 kg  1000–5000 kg  5000+ kg  not applicable | | |

**Part 1: Introduction, purpose and context**

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| 1. Do you think we have identified the right reasons to explore whether or not the mānuka honey science definition should be applied to domestically sold mānuka honey? Why/why not? |
| (Type your response here) |
| 2. Do you agree that New Zealand consumers and businesses do not currently have certainty on what regulators consider constitutes mānuka honey? Why/why not? |
| (Type your response here) |
| 1. Do you agree with our assumption about mānuka honey that is sold in New Zealand making its way to overseas markets? Why/why not? |
| (Type your response here) |
| 4. Do you agree with the risks that we have identified if mānuka honey was sold in New Zealand were to be traded overseas? Why/why not? |
| (Type your response here) |

**Part 2: Options for the mānuka honey science definition to apply domestically**

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| *Objectives for a mānuka honey science definition standard*   1. Do you think we have identified the right objectives? If not, what do you think needs to be included or changed? |
| (Type your response here) |
| *Option 1: a voluntary science definition standard*   1. If the voluntary option is progressed, do you agree that consumers will need a way of identifying mānuka honey that meets the standard? Why/why not? |
| (Type your response here) |
| *Objectives for a mānuka honey science definition standard*   1. Do you have any other suggestions for identifying mānuka honey that meets the standard for consumers? |
| (Type your response here) |
| 1. Do you agree with the assessment of the option to apply the science definition through a voluntary standard against the objectives? Why/why not? |
| (Type your response here) |
| 1. As a business, would you be likely to opt-in to a voluntary standard? Why/why not? |
| (Type your response here) |
| *Option 2: a mandatory science definition standard*   1. Do you agree with the assessment of the option to apply the science definition through a mandatory standard against the objectives? Why/why not? |
| (Type your response here) |
| 1. Do you have any evidence of what the impact of a mandatory standard would be on the mānuka honey market in New Zealand? Please provide evidence if you do. |
| (Type your response here) |

**Part 3: Rules and requirements if the mānuka honey science definition is applied domestically**

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| 1. Do you think any other areas need to be included in a domestic standard? If yes, what are they and why do you recommend they should be included? |
| (Type your response here) |
| *What products should a science definition standard apply to?*   1. Do you agree with the proposed scope of what the mānuka honey science definition would apply to? Why/why not? |
| (Type your response here) |
| *Who should the domestic mānuka honey science definition standard apply to?*   1. Do you agree with this assessment of who the requirements should apply to? Why/why not? |

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| 1. Do you think any other areas need to be included in a domestic standard? If yes, what are they and why do you recommend they should be included? |
| (Type your response here) |
| *What products should a science definition standard apply to?*   1. Do you agree with the proposed scope of what the mānuka honey science definition would apply to? Why/why not? |
| (Type your response here) |
| *Who should the domestic mānuka honey science definition standard apply to?*   1. Do you agree with this assessment of who the requirements should apply to? Why/why not? |
| (Type your response here) |

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| *Testing requirements*   1. Do you agree with the proposals for testing requirements and associated areas of responsibility for operators? Why/Why not? |
| (Type your response here) |
| *Testing requirements*   1. What do you estimate the increased costs would be for your business if you needed to follow these testing requirements? Please provide evidence if available. |
| (Type your response here) |
| *Labelling requirements*   1. Do you agree with the proposals for labelling requirements? Why/Why not? |
| (Type your response here) |

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| *Record keeping and administration requirements*   1. Do you agree with the proposals for record keeping and administration requirements? Why/Why not? |
| (Type your response here) |
| *Record keeping and administration requirements*   1. What do you estimate the increased costs would be for your business if you needed to follow these record keeping and administration requirements? Please provide evidence if available. |
| (Type your response here) |
| *Verification requirements*   1. Do you agree that test results and sampling records should be verified? Why/why not? |
| (Type your response here) |

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| *Verification requirements*  21. Which verification option do you prefer from:  1) Verification of test and sampling records at the same time as regular verification visits;  2) Additional verification of test and sampling records; or  3) As part of the standard, all mānuka honey operators need to be verified annually?  Why? Do you have any other suggestions for how verification could take place? Would your preference be different for a mandatory or voluntary standard? |
| (Type your response here) |
| *Verification requirements*  22. What do you estimate the increased costs would be for your business for each verification option? Please provide evidence if available. |
| (Type your response here) |
| *Enforcement requirements*  Enforcement for a voluntary science definition standard   1. Do you agree with these enforcement mechanisms for a voluntary standard? Why? Do you have any other suggestions for how compliance could take place for a voluntary standard? |
| (Type your response here) |

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| *Enforcement requirements*  Enforcement for a mandatory science definition standard   1. Do you agree with there being an infringement fee for non-compliance with a mandatory mānuka honey standard? Why? Do you have any other suggestions for how compliance could take place? |
| (Type your response here) |
| *Enforcement requirements*  Enforcement for a mandatory science definition standard   1. If there was an infringement fee, what do you think would be an appropriate amount? Should this amount change depending on whether it applies to an individual or a business? |
| (Type your response here) |
| *Transitional provisions*   1. Do you agree with these transitional provisions? Why/why not? Do you have any other suggestions for transitional provisions that should be put in place? |
| (Type your response here) |

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| 1. Do you think the regulation of domestically sold mānuka honey products should change? Why/Why not? |
| (Type your response here) |
| 1. If regulation were to change, would you want all mānuka honey sold in New Zealand to meet a scientific standard? OR would you still like to be able to purchase/produce mānuka honey that did not meet a scientific standard? Please explain. |
| (Type your response here) |
| 1. If you think the mānuka honey science definition should be applied to mānuka honey sold on the domestic market, do you prefer the voluntary standard option or the mandatory standard option to implement it? Why? |
| (Type your response here) |

**Once you have completed this form**

Please save the document and email it to: [Manuka.Honey@mpi.govt.nz](mailto:Manuka.Honey@mpi.govt.nz)

**Next steps**

Once we have received submissions from interested parties, we will consider all of the new information and perspectives that have been provided. We will use this to further inform our analysis and a summary of the information we have received through consultation will be made available.

If the submissions we receive during consultation suggest that change is needed, we will consult further with industry representatives about what the standard will look like.