

Mānuka Honey Labelling Guidelines Work Group and Science Work Group Meeting Summary

Tuesday 11 March 2014, The Terrace Conference Centre, 114 The Terrace, Wellington

Chair: Scott Gallacher (guidelines group) Ian Fergusson (science group)

In attendance: See Appendix 1

Main Session (9am to Lunch)

Welcome and introductions

Welcome and introduction by Scott reflecting on the agenda and purpose for the day.

Terms of Reference

Scott went through the Terms of Reference which were agreed by the group. The group noted that correct pronunciation and spelling of mānuka will be used. The agreed Terms of Reference are available on the MPI website <http://www.mpi.govt.nz/food/food-safety/manuka-honey>

The group noted the intention is to be as transparent as possible, with members able to provide feedback information both to and from the industry. Notes from the work group meetings will be circulated to all members and then posted on the MPI website.

Overview of Guidelines and Discussion of Issues

Scott talked the group through an example of what the guidelines would look like. Discussion covered the following areas:

- Guidelines set out what is in the law and how this applies to mānuka honey. The work group will help ensure this information is presented in a way that is easy for the industry, consumers and overseas regulators to understand.
- The possible need to clarify meaning of the word 'blend' to distinguish between bees naturally blending floral types in honey and blending that takes place as part of the commercial honey production.
- Need to clarify the use of the common or botanical name, when applying the CODEX standard to determine if a honey is wholly or mainly from one floral source.
- While the guidelines will be voluntary, they provide an interpretation of the existing regulatory requirements and may be used by overseas regulators or domestically to determine whether a honey complies with the law.
- Requirements relating to the export of honey in drums.

Summary of Submissions on MPI's September 2013 Discussion Document

MPI gave a presentation on the themes that emerged from submissions. The presentation highlighted the lack of consensus within the industry on an appropriate definition for mānuka honey. The Summary of Submissions is available on the MPI website <http://www.mpi.govt.nz/food/food-safety/manuka-honey>

MPI charted some of the data points provided by industry. Data did not indicate a strong correlation between MG and pollen. There are some questions about the consistency of the data and analysis is being treated with caution. Further debate on this was referred to the science work group.

Food Standards Code – information about health claims, nutrition claims, content claims

MPI gave a presentation on the Australia New Zealand Food Standards Code (the Code). This canvassed food identification requirements, characterising ingredients and changes in the Food Standards Code (transition from 1.1A.2 to 1.2.7) and what this means for nutrition claims, therapeutic claims and health claims. The presentation can be found on MPI's website.

The food identification standard requires that the name of the food, lot identification and the name and address of the supplier must appear on the product label. Honey is a 'prescribed food' in the Code, which means that the term honey must be used on all honey. However, there are no requirements for 'mānuka honey'. Manufacturers must also ensure that the product is true to the label.

In cases where businesses mix one honey with other honey types and 'mānuka honey' is used on the label, the percentage of mānuka honey must be included on the label.

Standard 1.2.7 (Nutrition, Health and Related Claims) of the Code was introduced in 2013 with a three year transition period. It set rules about the types of claims that can be made on a food label. At present businesses must either meet Standard 1.2.7 or the transitional Standard 1.1A.2. By 18 January 2016, all food businesses must comply fully with Standard 1.2.7. There is no stock-in-trade period at the end of the three-year period. This means that long shelf life products should be labelled to Standard 1.2.7 now or at some stage in the near future.

Under both Standard 1.2.7 and the transitional Standard 1.1A.2, therapeutic claims cannot be made. Peroxide activity, total peroxide activity, total activity and non-peroxide activity are likely to be considered therapeutic claims as they are implying that they can be used to treat or prevent bacterial infections when the honey is ingested.

It was highlighted that there is an international trend to tighten up regulation around health claims.

Guidelines Group Session (1.15pm to 2.45pm)

Discussion reflected on the morning session:

- There are still some questions to be resolved with a definition for mānuka honey. However, Food Standards Code requirements are non-negotiable and companies need to be proactive and start making changes now to ensure products will comply.
- Mānuka has a strong future with demand exceeding supply. It is important to protect this potential and the work of those who are producing genuine mānuka honey.
- *Kānuka and mānuka split*: question of whether the common understanding of mānuka includes kānuka. Some discussion about bees collecting pollen from other species, including rewa rewa. Comment that discussion needs to decouple the question of what makes honey wholly or mainly mānuka from the marketing of the product.
- *Ongoing science to differentiate kānuka and mānuka*: the group noted that guidelines need to incorporate new science when this becomes available.
- *Compliance*: question of what can be done immediately to address products that are not complying with the current law. Discussion highlighted that there needs to be a 'package' approach to the issue—this will include the guidelines along with compliance. Scott emphasised he welcomes information on non-compliance with New Zealand law and will ensure MPI investigates.
- The group identified the need for prompt clarity for existing brands. MPI and UMFHA will be meeting to discuss the UMF trademark.
- Open question about whether the guidelines become a 'labelling guide for honey' with sections for mānuka, 'blends' (maybe using a different word), and other honeys. It was noted that prior work has been done by the Bee Products Standards Council on defining other honey types.

Science Group Session (1.15pm to 2.45pm)

The group recapped where previous conversation had got to, current projects that are happening and how the group would work with the guidelines group. Points of discussion are noted below:

- *Working with labelling group*: Recognition that the labelling guidelines group will likely have to use what is currently known, the science group needs to define mānuka from a scientific perspective not from the claims perspective.
- *Samples*: It will be important to have all tests performed on the same set of samples so comparisons can be made. It was recommended that a checklist is put together on the honey samples used for the different science work streams. This could include region, storage conditions, volume, chemical traits, physical traits etc.
- *Next steps*: Present a list of scientific options to the labelling group and identify the limitations associated with each proposed test. Need to continue the discussion outside the working group meeting.
- *MPI initiated pollen work to date*: review of Classifynder, Moar's paper, pollen analysis/extraction techniques. Consistency needed regarding pollen methodology for enumeration, morphology and molecular methods.

- *Pollen characterisation*: could be used to determine if the honey is of New Zealand origin provided appropriate reference specimens are available for comparison. Need for reference samples from New Zealand and overseas markets to determine specificity of New Zealand pollen.
- *Pollen as a marker*: not suitable as the only marker. It will be important to consider the impact of dehydration and the variation in pollen derived from male and female plant. There is value in developing a protocol to maximise the recovery of honey and pollen to standardise industry practice if pollen is to be used as a marker or indicator of mānuka authenticity.
- *MPI initiated molecular technologies work to date*: developing proof of concept real time PCR for mānuka (defined as *Leptospermum scoparium* and recognised subspecies). Work needs to consider sources of plant DNA e.g. pollen, nectar or environmental within the honey. Metagenomics using next generation sequencing could be considered for further characterisation of plant and microbial DNA present in honey.
- *Chemical fingerprinting work*: Analytica is currently doing work on UMF honey samples. This involves chemical profiling to identify specific compounds present only in mānuka and kānuka. The project involves nectar and honey collected at various stages throughout the process. The plan is to compare with other floral types of nectar and honey and expand the samples to include non-New Zealand sources.
- *Potential sources of honey samples for different work programmes*: Airborne honey has a collection of 500 archive samples for which a variety of measurements have been collected (e.g. colour, pollen, sugar profiles, conductivity). The combination of these measurements enables identification and differentiation of mānuka/ kānuka from other honey and enables provenance to be determined. GNS and Mānuka Health also have extensive honey collections which could be provided for the science work.

Summary and Next Steps

- The work group agreed key messages for members to take away and communicate with the wider industry.
- MPI will draft notes and circulate to all members for comment. These will then be posted on the MPI website.
- MPI to update Q and As on website to reflect further information about therapeutic, health and nutrition content claims
- MPI to develop 'strawmen' options for manuka honey definition, and circulate to members for discussion at the next working group meeting.

Upcoming meetings are:

- Thursday 10 April, Auckland
- Thursday 8 May, Wellington (details tbc)
- Tuesday 10 June or Thursday 12 June (details tbc)

Appendix 1: Attendees

Guidelines work group

Scott Gallacher (MPI) - Chair

Victor Goldsmith

John Hartnell

Moiria Haddrell

Pam Flack

Steve Lyttle

Graham Cammell

Lisa Winthrop (MPI)

Apologies: Kerry Paul

Science Work Group

Ian Fergusson (MPI) – Chair

Dr. Karyne Rogers

Dr. Mandy Suddes

Peter Bray

Dr. Terry Braggins

Dr Ralf Schlothauer

Dr Mark Goodwin

Apologies: Marilyn Manley-Harris