



17 January 2024

Project Manager  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143  
NEW ZEALAND

Email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Tēnā koe

Attached are the comments that the New Zealand Food and Grocery Council wishes to present on the *Call for Submissions – Application A1257 Australian native bee honey*.

Ngā mihi nui





## **Call for submissions – Application A1257 Australian native bee honey**

**Submission by the New Zealand Food and Grocery  
Council**

**17 January 2024**

---

## NEW ZEALAND FOOD AND GROCERY COUNCIL

1. The New Zealand Food and Grocery Council (**NZFGC**) welcomes the opportunity to comment on the *Call for Submissions – Application A1257 Australian native bee honey*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

## THE APPLICATION

3. The Australian Native Bee Association Inc. (**ANBA**) has sought to have the Australia New Zealand Food Standards Code (**the Food Standards Code**) amended to accept honey produced by Australian native stingless bees as a standardised food in Australia and New Zealand and thereby permit its sale and use in both countries. The ANBA states that honey from Australian native stingless bees cannot currently be sold in Australia or New Zealand as it does not meet the definition of honey in the Code or the compositional requirements for honey in Standard 2.8.2 – Honey. Australian native bees of interest are of the genera *Tetragonula* and *Austroplebeia* and therefore are not known as honeybees, which are within the genus *Apis* in the family *Apidae* of the bee clade, all native to mainland Afro-Eurasia.

## COMMENTS

4. NZFGC is generally supportive of the ANBA Application and the ANBA's desire to support traditional foods such as native bee honey. Such foods enrich the food supply and generate product variety for consumers.

### **Definition of honey**

5. We agree that the current definition in Standard 1.1.2 in the Food Standards Code presents problems:

“**honey** means that natural sweet substance produced by honey bees from the nectar of blossoms or from the secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which honey bees collect, transform and combine with specific substances of their own, store and leave in honey comb to ripen and mature.”
6. With its reference to ‘honey bees’ the definition is limited to bees of the *Apis* genus as defined by reputable sources such as the Collins dictionary ([HONEYBEE definition and meaning | Collins English Dictionary \(collinsdictionary.com\)](https://www.collinsdictionary.com/en/english-english/dictionary/honeybee-definition-and-meaning)) and the Australian Museum ([Honey Bee - The Australian Museum](https://australianmuseum.net.au/honey-bee)). Stingless native bees are not known as honey bees. We support an amendment to the definition of ‘honey’.

### **Composition of honey**

7. The composition of honey is set out in Standard 2.8.2—3:

Requirement for food sold as honey

A food that is sold as ‘honey’ must:

  - (a) be honey; and
  - (b) contain:
    - (i) no less than 60% reducing sugars; and

---

(ii) no more than 21% moisture.

8. The honey from stingless native bees contains less reducing sugars and more moisture. NZFGC therefore supports the proposed addition to Standard 2.8.2 of a clause with composition specific to native bee honey. We are also 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 understand that the New Zealand honey industry would like to work with FSANZ to develop a similar joint standard to prevent fraud with mānuka honey.

#### **Microbiological safety**

9. We have been alerted by Apiculture New Zealand that FSANZ did not include the potential contamination of *Bacillus cereus* and other *Bacillus spp.* and its consequences in your microbiological safety assessment. As is well known, *Bacillus cereus* (***B. cereus***) and other *Bacillus spp.* are pathogens and *B. cereus* is associated with both vomiting and diarrhoea. We consider 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 *Apis mellifera* honey.

#### **Honey imports**

10. There are biosecurity restrictions around the import of honeys into New Zealand to prevent the spread of diseases to the New Zealand bee population and because bee products could be vectors for other diseases such as European Foulbrood (which is present in Australia but not New Zealand). NZFGC is of the view that these should apply to the native bee honey. If this is outside the scope of the Food Standards Code, a note to this effect would greatly assist in making clear to users of the Food Standards Code that the sale of such products is not permitted in New Zealand.

#### **Traditional knowledge and cultural practices**

11. NZFGC considers that a recognition of traditional knowledge and cultural practices by FSANZ needs to be applied consistently. In the Supporting Document (p3), FSANZ notes 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 preceding paragraph reference is made to “the various regions in Australia becoming known for their **unique honey varieties such as eucalyptus, macadamia and manuka honey.**” Mānuka is a Māori word (from New Zealand’s indigenous people) and mānuka is a taonga species exclusively from Aotearoa New Zealand. It is insensitive of FSANZ to claim manuka honey is unique to Australia and it is important this reference be removed and the insensitivity avoided in future.