

# SUBMISSION

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To: Food Standards Australia New Zealand

Submission on: Proposal P1023

From: Federated Farmers of New Zealand

Date: 30 October 2012

Contact: [REDACTED]  
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Federated Farmers of New Zealand

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## **SUBMISSION TO FOOD STANDARDS AUSTRALIA NEW ZEALAND**

### **1. INTRODUCTION AND GENERAL COMMENTS**

- 1.1. Federated Farmers of New Zealand welcomes the opportunity to make this submission to Food Standards Australia New Zealand
- 1.2. Federated Farmers, supports the continuation of the current interim maximum levels for tutin in honey and comb honey through to 31 March 2015.
- 1.3. Federated Farmers, through its Bee Industry Group, is acutely conscious of requirements of food safety in honey. In addition to beekeepers, our members include producers, packers and exporters of honey.
- 1.4. Proposal P1023 calls for submission on three separate food standards. Federated Farmers submits only on the part of the standard pertaining to the continuation of the minimum allowable levels of tutin in honey and comb honey.

### **2. Federated Farmers supports the proposal of Food Standards Australia New Zealand to extend interim maximum levels for tutin in honey and comb honey through until 31 March 2015.**

- 2.1. Federated Farmers believes that it is in the interest of the honey industry in New Zealand to continue the current measures being undertaken to ensure that honey, sold domestically or exported, is safe to consume and a maximum limit for tutin is a key aspect of these measures.
- 2.2. An instance or a cluster of instances of tutin poisoning from New Zealand honey would cause severe damage to the marketability of all New Zealand honey. The economic impact of poor food safety practice by beekeepers or honey processors would not be restricted those responsible therefore, in this instance, it is not advisable to rely on industry good practice alone.
- 2.3. Aside from the obvious value to the honey and beekeeping industry, the Federation does not lose sight of the fact that primarily these standards are in place to protect the public from hazard and we believe it is clear that maximum allowable levels are an important part of that process.

**3. Specifically, Federated Farmers also supports the continuation of the current value of maximum levels of tutin in honey and comb honey.**

- 3.1. It is the opinion of the Bee Industry Group of Federated Farmers that the current levels of 2mg/kg of tutin in honey and 0.1mg/kg of tutin in comb honey satisfactorily strikes a balance between consumer safety and regulation of beekeepers.
- 3.2. Our members are satisfied that, given the information currently available to regulators, these limits do not require beekeepers or honey processors to undertake unreasonable measures and that they can operate within the limits without undue cost.
- 3.3. We also accept that a continuation of these interim levels are required to allow the Ministry for Primary Industries to complete a robust scientific examination of the issue ensure that the permanent maximum levels settled upon are realistically and practically obtainable while still meeting the extremely high threshold for public safety, and that that work is taking place.

**4. FEDERATED FARMERS**

- 4.1. Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.
- 4.2. The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
  - 4.2.1. Our members may operate their business in a fair and flexible commercial environment;
  - 4.2.2. Our members' families and their staff have access to services essential to the needs of the rural community; and
  - 4.2.3. Our members adopt responsible management and environmental practices.