



NATIONAL BEEKEEPERS' ASSOCIATION of NEW ZEALAND (INC.)

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SUBMISSION TO

The Australia New Zealand Food Authority

On the

Draft Assessment
(Full Assessment – S.23)

Proposal P246

“Labelling Omnibus Amendments to the Australia New Zealand Food Standards Code”

By:

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5 February 2002

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SUBMISSION ON DRAFT ASSESSMENT (FULL ASSESSMENT – S.23) PROPOSAL P246
“LABELLING OMNIBUS AMENDMENTS TO THE AUSTRALIA NEW ZEALAND FOOD
STANDARDS CODE”

Introduction

The National Beekeepers Association represents all beekeepers who own more than three apiaries or more than 10 hives.

A portion of these beekeepers also process and pack product for retail sale. Two of the Issues in this paper affect some members of the industry, namely:

Issue Two: Labelling of Individual Portion Packs – Standard 1.2.1

Issue Three: Exemptions from Nutritional Information Panels – Standard 1.2.8

Comment on the ANZFA Consultation with Stakeholders

The National Beekeepers Association is concerned at the lack of consultation with the Industry. We have had no written correspondence from ANZFA on this proposal. A check of the ANZFA website under the information for submitters shows that the NBA has been missed out in the various stages of the amendment process, i.e. we have had no notice or input on the Initial Assessment for this proposal to make submission on.

The NBA makes some general comments on the effects of these food standards rather than on some of the specific proposed amendments.

The NBA also requests that a provision is made on your website for a sign on facility that will automatically inform subscribers of new proposals that require public submission. This will greatly enhance stakeholders' ability to submit on proposals affecting their respective industries.

Executive Summary

- 1 That bee products be considered for Exemption for the Mandatory requirement for a Nutritional Information Panel.
- 2 That Bee products that are produced for sale in single serve or small packs be exempt from the requirement to show advisory labels, where the surface area is not more than 30cm²

We address Issue 3 first.

Exemptions from Nutritional Information Panels

The NBA notes the three criteria that ANZFA use for exemptions from NIPs.

The NBA believes that the second and third criteria listed may apply to products from the beehive.

Namely:

- 2 It is not practical to provide this information.
- 3 The product is one of the following items – fruit, vegetables, meat poultry or fish. These products are **exempt because they are single ingredient foods, there are difficulties in reliably analyzing and declaring such items and general nutrition information about them is more readily known.**

The NBA believes that because of the piece highlighted in 3 above, that bee products should be exempt from needing NIPs, unless nutritional claims are being made.

This of course will not hinder those who wish to supply this type of information to the public.

Problems associated with Nutritional information panels in relation to bee products

There are problems associated with nutritional information in relation to bee products.

This arises because of the inherent nature of the bee. In gaining the food necessary for survival, the bee may visit several different flowers for nectar and for pollen. In doing this there may be one or two primary nectars, and one to several secondary nectars that are stored in the beehive, that are then harvested by the beekeeper.

The composition of the particular honey type may vary from location to location and from year to year.

Thus to be able to provide a reasonably accurate nutritional panel, each batch of honey would need to be analysed. For the smaller packer in particular, this would prove to be a very costly exercise, with the cost associated with it not easily recovered, when competing with other products on the supermarket shelf.

When we look at a world renowned beekeeping book: "The Hive and the Honey Bee published by Dadant"

HONEY

It states from the Composition of honey p871

"When we consider the factors that contribute to the material we call 'honey', it becomes obvious that simply to list the composition of an average honey is of limited value. The environment of the area from which the bees collect the nectar (and other sugar containing materials), influences the types and variety of flora found therein and, hence the specific composition of the honey."

Page 872: "Variability is a most noteworthy and troublesome attribute of honey composition"

POLLEN

Chemical Composition of Pollen p 929

"Unlike an apple, a beef steak or soybeans, bee-collected pollen is not a uniform, distinct, and easily characterised product. Bee collected pollen consists of a blend of pollen grains derived from many, often dozens, of plant species in a given locality. One reason that bees collect a mixture of different pollens is that they are perennial, nutrient demanding, large colonies that must obtain a year round supply of food; and usually many pollen floral sources are available simultaneously to meet this need. By consuming a mixture of different types of pollen, bees also tend to provide a better nutritional balance".

The problem of chemical analysis of pollen becomes even more difficult because plant pollen sources not only vary by locations throughout the world, but also by season and year in a given locality."

The other products of the beehive that are sold for human consumption (Propolis, Royal Jelly, Bee venom) tend to be sold in very small quantities if sold as a single ingredient food, or sold as an ingredient in another food item.

CONCLUSION

With reference to the above information, the National Beekeepers Association deems that it is neither practical nor necessary for processors of bee products to provide NIPs on product for retail sale, especially when it is a single ingredient product.

Labelling of Individual Portion Packs

With regard to the requirement for individual portion packs to have a warning label on the individual portions, indicating the presence of allergenic substances:

The National beekeepers Association note that you still have listed in the Current Provisions that Royal Jelly, Bee Pollen, and Propolis has to have Mandatory Waming and Advisory Statements and Declarations.

The Association knows that as a result of submissions on the warning labels on the above bee products, that warning labels were to be revoked (After a report from the Regulations Review Select Committee that went to parliament on the 8th July 1999). This was pointed out to the Project Manager of ANZFA in a letter sent in by Jane Lorimer (a member of the Executive of the National Beekeepers Association) on the 17th May 2000.

A further e-mail was sent to Maureen Wempe (dated 22nd May 2000) with regards to this, outlining some personal correspondence with Mr Ron Law from the National Nutritional Foods Association, where he indicated that the inclusion of Advisory statements on Pollen had been in error. Mr Law had also spoken with the Ministry of Health, and was told that labelling requirements were still under review.

The Association had asked that any reference to Advisory Statements with reference to pollen be deleted from the Draft code at that time.

To the Associations knowledge, we have not been advised on the outcome resulting from this correspondence, and requests clarification on this issue. Once the current status is made apparent to the Association, we request that the Association be given time to make further submission on this issue, if the Association deems there is an issue that needs addressing.