



MPI Mānuka Honey Science Programme

August 2016 update



Photos: Dr Matt Buys, Scion

Want to find out more?

If you have any questions or would like more information about the MPI Manuka Honey Science Programme, please contact us at manuka.honey@mpi.govt.nz

The Ministry for Primary Industries (MPI) is leading and managing a science programme to support the development of a robust science-based definition for monofloral mānuka honey.

The mānuka honey science programme, which began in 2014, is finalising the validation of test methods that identify attributes associated with honey derived from mānuka plants (*Leptospermum scoparium*).

We are making good progress, and expect to complete the science programme by the end of 2016. Once finalised, work will start on updating requirements that will have to be met for the labelling of monofloral mānuka honey and the verification of honey sold as monofloral mānuka honey.

In the meantime, MPI continues to invest significant time and resource to address concerns with the labelling of mānuka honey. These are:

- » issuing new requirements;
- » ongoing compliance activities;
- » continuing liaison with regulators in other countries.

MPI's mānuka honey science programme aims to determine with a high level of specificity, attributes (chemical and/or DNA) that can be attributed to honey derived from *Leptospermum scoparium*.

In conducting the science, and researching appropriate attributes, the programme has had to manage a number of challenges:

- » Historically, non-peroxide activity (NPA), which is linked to the level of methylglyoxal has been used to characterise mānuka honey. However, methylglyoxal is unstable and levels change over the shelf life of the product. Also, both NPA and methylglyoxal are not unique to mānuka honey, they are present in honeys produced from related plant species – the limitations associated with NPA mean it is an unsuitable characteristic for verifying product authenticity and therefore will not be part of our definition for mānuka honey.
- » Identification of detectable and stable attributes that can distinguish mānuka honey from other honey types. Honey is a natural product that can vary due to geographical and seasonal differences.

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» Such variations must be considered when producing a scientifically robust definition for mānuka honey.

MPI is supportive of international rules for honey and recognises the value of robust science to underpin definitions. Mānuka honey continues to receive significant attention worldwide and we are not aware of any other monofloral honey being the subject of such extensive research.

MPI continues to work with national authorities in our key markets to ensure consumers can have confidence in the mānuka honey they purchase.

Purpose of the interim guidelines

The purpose of the interim guidelines, published in July 2014 by MPI, is to provide industry with guidance on how to interpret existing legislative requirements for labelling of mānuka honey when sold as a food.

The guidelines are not legally binding, they are simply a tool to clarify and explain existing requirements that are legally enforceable under the Australia New Zealand Food Standards Code, the Food Act 2014, and the Animal Products Act 1999.

Scope of the interim guidelines

The New Zealand government supports all efforts to counter the actions of anyone attempting to pass off New Zealand product as something that it is not. That is why MPI has invested considerable time and resource into untangling what is a complex and challenging issue.

However, it's important to keep in mind what the interim guideline is, and what it intends to achieve.

The interim guidelines were not intended to be a final and definitive response to resolving concerns or disagreements about what constitutes mānuka honey.

The interim guidelines simply clarify existing requirements that are legally enforceable. They are not intended, on their own, to resolve this complex and challenging issue.

In this respect, they have been successful in helping to enhance clarity, but we acknowledge more work needs to be done. MPI is close to reaching a conclusion of its work to find a scientifically robust definition for mānuka honey, and continues to enforce the law within its jurisdiction.

So how does MPI ensure the correct labelling of honey?

New Zealand has no legal jurisdiction over New Zealand-produced honey packaged and labelled in other countries. This means that New Zealand cannot take direct action against mislabelling in other countries.

The primary obligation to ensure labels meet legislative requirement is the food business. MPI-recognised verifiers review labels of New Zealand retail ready honey packs to verify they meet legal requirements. There have been instances where honey has been withheld from export due to labelling requirements not being met. Honey with non-complying labels can be relabelled so that it complies with legal requirements.

Has the Manuka Doctor court case affected labelling requirements

The Mānuka Doctor case focused on one aspect of labelling in relation to an implied health claim: whether a claim had to identify a specific health benefit to be a health claim within the meaning of the Australia New Zealand Food Standards Code.

The New Zealand Court of Appeal held that a vague reference to health benefits did not bring the statement within the parameters of the Australia and New Zealand Food Standards Code (i.e. there had to be specific health benefits identified).

MPI does not consider that the ruling undermines the labelling guidelines. The case had the effect of sending a clear message that MPI is watching labelling practices and is prepared to seek clarity from the courts when necessary.



Export of bulk honey

To help address concerns with the trade in bulk honey, MPI issued new requirements in February 2016, the Official Assurances Specifications for Animal Material and Animal Products which can be found on MPI's website at

<http://www.mpi.govt.nz/document-vault/11434>.

The only export document that MPI provides is the sanitary export certificate, which includes only "honey" as a product description. Until a verifiable definition is available for honey types, these cannot be put on official sanitary export certificates.

These required unlabelled retail packs and bulk honey, exported with an official assurance, to be indelibly marked with:

- » the manufacturing premises unique identifier number;
- » product description (i.e. the word "honey");
- » country of origin; and
- » the product's batch code.

This information enables product to be traced from New Zealand to an importing country and vice versa. The packing and labelling of bulk product (apart from that detailed above) falls within the jurisdiction of an importing country where that country accepts importation of bulk containers for repacking. It is also important to note honey has an extended shelf life so it may take some time for existing stock, produced before MPI's actions, to be sold.

Statistics on the export of honey

From July 2014 to June 2015, New Zealand exported a total of 9,046 tonnes of honey. These figures do not distinguish between mānuka honey and other honey.

This information can be found in MPI's 2015 Apiculture monitoring report at

<http://www.mpi.govt.nz/document-vault/11109>

