

15 March 2021

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Submission Date: 15 March 2021

PROPOSAL M1018 SUBMISSION

RE: GLYPHOSATE IN HONEY MRL 0.2 mg/kg

From humble beginnings in 1953 Capilano Honey, now known as Hive & Wellness Australia (HWA), has successfully grown into one of the world's leading honey packers. Over the last 68 years, HWA has helped nurture Australian beekeepers who produce the highest quality honey in the world. The company has built a reputation for product innovation and global best practice in systems and procedures. HWA is proud to be an Australian owned company, operating packing facilities in Queensland, Victoria and Western Australia, with the capacity to pack more than 45,000 tonnes of Australian honey each year. HWA is Australia's largest purchaser and exporter of Australian honey, with exports to more than 32 countries around the world, purchasing honey from more than 800 Australian rural and regional beekeeping businesses and families. HWA as a packer of various brands has the largest retail market domestic market share for honey in Australia.

Research has shown bees to forage as far as 9.5 km from the hive, with a mean distance closer to 1 km, subject to the abundance of flowering resources¹. In terms of the honey bee's exposure to glyphosate, uptake and subsequent contamination of honey or bee products could have occurred if:

- the bees themselves got sprayed while foraging;
- flowers frequented by the bees contained glyphosate from either direct spraying or aerial drift;
- nectar generated from plants or trees contained residual levels of glyphosate;
- water that the bees drank on plants, on the ground or in natural or man-made dams/rivers contained glyphosate.

In all cases, contamination could have occurred at a distance from the hive. The water that bees consume is a likely source of glyphosate considering its high solubility. The beekeeping industry does not have any control over many of the environmental impacts or third-party agricultural practices likely to result in advertent uptake of glyphosate in honey. Beekeepers are innocent victims who see their honey products contaminated simply because they might be located within a few miles of lands where glyphosate is used, or their bees drink water previously contaminated. The honey industry is faced with the inadvertent contamination of honey resulting from the legitimate use of registered glyphosate products in Australia.

Proud supporter of 100%
Australian honey



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HWA was supportive of the harmonisation Submission to FSANZ from the Australian Honey Bee Industry Council (AHBIC) with respect to the establishment of a glyphosate MRL for honey. Likewise, we have provided data and support to AHBIC with respect to the preceding Submission to the APVMA to establish an MRL for glyphosate in honey. It has been pleasing to see the progression of a 0.2 mg/kg glyphosate MRL in the Agricultural and Veterinary Chemicals Code (MRL Standard), which HWA supports.

CONCLUSION

HWA strongly advocates for the establishment of clear, uniform, unambiguous MRL standards for honey, especially when there is no human health risk or considerations.

At present, under the Trans-Tasman Mutual Recognition Arrangement (TTMRA), Australia and New Zealand accept food commodities that are legal for sale in each country regardless of the sale-related regulatory requirements in the individual country. There are significant quantities of New Zealand honey entering Australia and we would like to see MRL protection for Australian beekeepers with respect to glyphosate residues. As FSANZ would be aware, there is a 0.1 mg/kg glyphosate MRL limit for domestic New Zealand honey.

HWA strongly supports FSANZ's M1019 proposal to make a variation to the Code to include a glyphosate MRL at 0.2 mg/kg for honey.

Yours truly,

HIVE & WELLNESS AUSTRALIA PTY LTD



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