

P1029

Food Standards Australia New Zealand Proposal - Maximum Level for tutin in Honey

Submission from: Hikutaia Honey Ltd Company Directors

[REDACTED]

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[REDACTED]

New Zealand

[REDACTED]

Question 1: Are there any other options that are significantly different from the above that should be considered?

As you state on page 2 of Supporting Document 2 “there is considerable uncertainty in extrapolating the findings from a small scale study to an entire population”

Given this very LIMITED study we do not believe there should be change to the current standard without further work. Constantly government agencies request proper science to be used in all matters that have impact on health, incomes, trade therefore it seems somewhat inconsistent that this is not the case here. There is certainly no basis to suggest that a third of the population will **definitely** suffer signs of tutin poisoning at the current level of 2mg/kg. Yes in light of current research action needs to be taken however that action should be the initiation of valid science to substantiate and initial finding.

Clearly if option 4 is endorsed there will be no further work carried out on tutin as stated on page 24 of Supporting document 2.

Will this necessarily safeguard the entire population? **YOU DON'T KNOW YOU ARE JUST GUESSING.**

Before legislation is passed into law there should surely be substantial good science to back up the rational regardless of the law.

OPTION 5 should be maintain the current standard while initiating a statistically sound pharmacokinetic study.

We find it staggering that important agencies such as FSANZ and MPI would be associated with such poor studies and then use said studies to initiate standards.

We are a commercial beekeeping business which produces around 45 tons of extracted honey per year. We have not needed to blend honey in recent years as we have changed management practices to meet the 2mg/kg requirements. We do not produce comb honey.

Leaving the limit at 2mg/kg as per Option 3 while initiating statistically sound pharmacokinetic studies would minimize cost to the industry and cover the possibility of overseas market access or revenue issues.

Question 15 How much honey not packaged for retail sale will you have left from the year to June14 harvest period by December 2014?

We could have potentially have 50% (22 Tons) of our honey unsold to a packer who may of course hold it longer to meet market requirement.

Question 16 Do you agree with no transitional arrangements for the implementation of the proposed permanent maximum levels for honey and comb honey given the new maximum levels would not apply to products packaged for retail sale prior to the changes being gazetted.

WE DO NOT AGREE with no transition. There is significant amounts of honey held in drums throughout New Zealand for up to 2 years. If the rule does not apply to packed honey then it seems a double standard to have no transition for bulk honey.

If new limits are to be set there should be a transition time relating to harvesting under the new rule as this may make a difference to where honey is harvested from and how. It allows beekeepers the opportunity to comply.

SUMMARY

As an industry we are always told by authority to have our requests based in sound peer reviewed science. The proposal offered for changing the maximum level of tutin does not meet this criteria. Yes the science on there being bound and unbound tutin is good, the follow up human pharmacokinetic study is poor to say the least. If all food standards were based on this type of limited study nothing would be safe to eat.

With no review once the standard is set it is imperative that the correct level is set. The only way to do this is with good science.

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