
Analysis of Submissions: Draft Animal Products (Harvest Statement and Tutin Requirements for Export Bee Products) Notice 2009

15/06/2009

The NZFSA proposed to implement export requirements for control of tutin in honey and revise the beekeeper Harvest Statement

The submissions received on the above proposals are presented in the following table, together with NZFSA's responses to the submissions. Two submissions were received: one from an organisation representing a number of bee product businesses (No. 1 in the table below) and one from an individual (No. 2 in the table below).

There being no significant amendments needed as a result of the submissions, NZFSA is publishing this analysis at the same time as the notice is being issued.

Submissions			
No.	Clause	Submission comment ¹	NZFSA Response
1	General	[The organisation] has looked into the proposed Animal Products (Harvest Statement and Tutin Requirements for Export Bee Products) Notice 2009 and have consulted our members on this notice. We support the proposed notice in its current form.	Noted.
2	Harvest Statement	The Draft Harvest declaration needs modification as to be filled in as specified by the last RMP auditor, means there is now no connection between the Harvest Declaration and the Transfer Document.	The draft notice requires the Harvest Statement to be completed and signed by the beekeeper who is submitting the honey or other bee product to an RMP operator for processing. The RMP verifier, during their verifications of the receiving RMP business, will verify the link between the incoming Harvest Statement(s) and the outgoing Transfer Document(s).

¹ The comments are taken directly from the submissions received, except where it has been necessary to make changes to preserve confidentiality and improve readability.

2	Harvest Statement	<p>The Harvest Statement starts with the “Consignment Details”, what does this mean? Removing honey from hives is not being consigned at this stage anywhere.</p> <p>Product Type: - At the stage of harvesting the only answer is “honey”</p> <p>Quantity: - I used to record here the containers the honey went into which matched the transfer document. I am told that I must only record how many supers of honey were removed.</p> <p>Identified as (Code Number): - Until processed there would not be a code number apart from the apiary or apiaries of origin as shown on the next line of Apiary Registration numbers.</p> <p>Date of Harvest: - Because I was matching the honey with the drums or other containers I used to put the processing date, which incidentally is usually close to the harvest date. I realise you are looking at the harvest date to compare with the restricted removal dates.</p>	<p>“Consignment Details” is the heading for the table immediately beneath. The form will be formatted to make this more obvious.</p> <p>Recognising that pollen and beeswax are derived from honey frames, there are 3 distinct products that are the subject of a harvest statement: honey (supers), propolis and royal jelly. A harvest statement is required for all of these bee products.</p> <p>For honey, the number of supers submitted for extraction is the correct entry for “quantity”.</p> <p>This is a carry over from the original harvest statement from 2003(?). Its purpose has not changed. The field is there for the beekeeper to enter the identification numbers of the honey supers.</p> <p>It is important that the actual harvest date be recorded. Harvest date is the date on which the product can no longer be further worked on by bees.</p>
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2	Harvest Statement	<p>Why not dispense with the Harvest Declaration entirely and during RMP audit ensure that each beekeeper has adequate records to trace the honey? Surely the whole aim is to be able to trace back honey when necessary.</p>	<p>NZFA requires consistency of information. A harvest statement provides information in a format that is consistent across all operators and provides for ease of verification. While it is possible to rely on conscientious operators to maintain adequate records, a robust assurance system must put in place documentation requirements to cater for all operators. The aim of harvest declarations and other documentation required in export notices is to support issuing official assurances, and provide a credible system to overseas markets, in addition to being able to trace back honey when necessary.</p> <p>NZFA notes that the provision for equivalent records (in place of a Harvest Statement) continues as an option for an extractor/processor when they are extracting/processing their own bee products.</p>
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