

Antonia Reid
Senior Policy Analyst,
Sector Policy Ministry for Primary Industries
P O Box 2526
Wellington 6011

30 September 2013

Dear Ms Reid,

Re: Options for Defining Monofloral Manuka Honey

NZBIO is the industry association for New Zealand's bioscience community. With over 60 corporate members and another 70 individuals, NZBIO has broad representation of the sector in the country from multi-national pharmaceutical companies to small start-ups. As well as what might be considered 'core biotech companies' - those for which bioscience is the main activity and are focused on the production of bioscience products, we represent companies and organisations involved in primary production - such as forestry, farming and food production, industrial and environmental research and technologies, high tech manufacturing, alternative fuels, human therapeutics, diagnostics and devices, animal health products, and biologically-based clean tech companies.

Manuka Honey is an important export for New Zealand companies, including a number of our members, and we welcome MPI developing guidelines for its definition. Given the additional premium available on Manuka Honey and the fact it is strongly identified with this country we believe it is important to have a reliable definition which is adhered to by the industry for New Zealand to retain its reputation for integrity. It is also important to ensure that companies maintaining high standards are not placed at a competitive disadvantage.

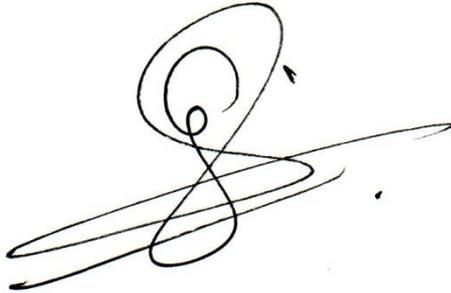
Because Manuka Honey is sold both on the source of the honey and its biological activity we support the option of using both pollen content and methyl glyoxal content to define honey as Manuka Honey. If manufacturers and distributors cannot afford the additional testing costs imposed then they should not be expecting to receive the premium that Manuka Honey commands.

However, we believe that the science on certain identification of honey as Manuka Honey is not complete and that methyl glyoxal alone is not a sufficient chemical marker and neither is pollen identification sufficiently reliable to be 100% sure. We therefore recommend that the use of pollen and methyl glyoxal be used as an interim standard and further work on developing a reliable chemical signature of Manuka Honey be undertaken by the industry.

Thank you for the opportunity to comment on the Consultation Paper and should you require any more information or wish to discuss points raised further please do not hesitate to contact me.

No part of this submission needs to be withheld under the Official Information Act 1982.

Yours sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Dr George Slim
CEO

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