Ministry for Primary Industries
Manatū Ahu Matua

Guidance Document

Interim Labelling Guide for Mānuka Honey

A guidance document issued by the Ministry for Primary Industries

New Zealand Government

Title Interim Labelling Guide for Mānuka Honey

About this document

The Ministry for Primary Industries (MPI) publishes a variety of guidance documents. Typically these explain the applicable requirements; assist stakeholders to comply with the requirements; explain the MPI's role; or help stakeholders to provide required documentation to the MPI.

While guidance material is not legally enforceable, this guide is based on requirements of the Food Act 1981, the Animal Products Act 1999, the Fair Trading Act 1986 and the Australia New Zealand Food Standards Code. The exception is the section 'Characteristics of New Zealand Mānuka-type honey' as the content of this section is scientific in nature and research/testing methods develop and change over time. At the point where scientific testing and analysis regarding identifiable components of mānuka honey is un-contestable, it is envisaged that MPI will consult with stakeholders on how best to implement these.

Any guidance on how to comply with the applicable requirements may not be the only way to achieve compliance. Stakeholders are encouraged to discuss significant departures from the approaches outlined in this guidance document with MPI to avoid expending resources on the development of alternative approaches which may not be acceptable.

The term "must" is not typically used in guidance. In this particular document the term "must" is simply used when quoting or paraphrasing the requirements set out in the related legislation.

Related requirements

If you process, store, sell or export honey or other bee products, you must comply with requirements under one or both of the Food Act 1981 or Animal Products Act 1999.

The Food Act 1981 applies if you extract or pack bee products that are intended for sale only in New Zealand or export to countries that do not require official assurances (export certificates). To comply with the Food Act, you need to have a registered Food Safety Programme or operate under the Food Hygiene Regulations. You can choose to operate under a Risk Management Programme (RMP), but this is not a requirement. However, if you do, then you do not need to meet the requirements for a Food Safety Programme or the Food Hygiene Regulations.

If your bee products are intended for export to countries that require official assurances (export certificates), you must meet requirements under the Animal Products Act 1999. These requirements include operating under a registered Risk Management Programme (RMP), which is usually based on a template using a Code of Practice (COP); participate in the residues monitoring programme, which tests for contaminants in bee products – this is governed by a Regulated Control Scheme (RCS); and meet general requirements for export and any overseas market access requirements (OMARs).

A summary of the relevant requirements to be met can be found at:
http://foodsafety.govt.nz/elibrary/industry/honey-bee-products-roadmap.pdf

Change history

Previous Version Date	Current Version Date	Section Changed	Change(s) Description

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Disclaimer

This guidance does not constitute, and should not be regarded as, legal advice. While every effort has been made to ensure the information in this guidance is accurate, the Ministry for Primary Industries does not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion that may be present, nor for the consequences of any decisions based on this information.

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Contents

1 Purpose

(1) This interim labelling guide explains labelling requirements that apply to businesses that are supplying mānuka honey or honey containing mānuka honey for sale within New Zealand, and provides a basis for the labelling of exported honey.

(2) Exporters of honey are additionally required to ensure that their products meet the regulatory requirements of countries they export to.

2 Scope

(3) This interim guide applies to honey produced in New Zealand and sold as food under the Animal Products Act 1999 and the Food Act 1981.

(4) Products meeting the definition of a dietary supplement or those that are defined as medicines, related products or medical devices under the Medicines Act 1981 and the Medicines Amendment Act 2013 are excluded from this guide.

(5) Bee keeping and honey packing practices are not included in this guide. Businesses should be aware that practices such as excessive heating and filtering, and adding ingredients or chemical compounds to honey may result in a final product that cannot be labelled as honey, or that breaches New Zealand and/or importing country legislation.

(6) This interim guide outlines requirements that apply when honey is packaged in a container that is intended for retail sale. For honey being transferred between bee keepers and pack houses (which is not an intra company transfer), or honey sold in bulk form, the honey must be accompanied with sufficient information to allow the purchaser to comply with the requirements of the Code, when packaging for retail sale (Standard 1.2.1). The guide assists with ensuring that information accompanying bulk honey is sufficient for this purpose.

3 Review

(7) The guide has been produced following consultation with the mānuka honey industry and scientists, based on the best information currently available. The Ministry for Primary Industries (MPI) notes that several research programmes are underway to develop more robust methods of identifying New Zealand mānuka honey. MPI will review this interim guide to incorporate any additional scientific research that can help clarify the definition of mānuka honey by July 2015.

(8) The use of boxes through-out this document indicates the text is explanatory.

4 Background

(9) Food sold in Australia and New Zealand must comply with the Australia New Zealand Food Standards Code (the Food Standards Code). Labelling and compositional requirements are found in the Food Standards Code. Businesses should be thoroughly familiar with those requirements which can be accessed via the Food Standards Australia New Zealand (FSANZ) website www.foodstandards.govt.nz. The inclusion of 'Standards' throughout the text refers to Standards of the Food Standards Code. Hyperlinks to the relevant Standard are also provided.

(10) Other New Zealand requirements affecting the labelling of mānuka honey, specifically prohibiting misleading and deceptive labelling, can be found in:

a) The Food Act 1981 (Section 10: Misleading labelling and packaging, and Section 11: Restrictions on advertising);
b) The Animal Products Act 1999 (Section 127: Offences involving deception); and
c) The Fair Trading Act 1986 (Section 10: Misleading conduct in relation to goods, Section 12a-12d: Unsubstantiated representations).

(11) The up-to-date version of these statutes is available at www.legislation.govt.nz. Businesses should note that section 12a -12d 'Unsubstantiated Representations' of the Fair Trading Act 1986 is a new legislative requirement with substantial financial penalties.

(12) This interim guide explains many of the labelling requirements that currently affect businesses that are preparing honey for sale in more detail. It covers:

a) labelling requirements; and
b) the characteristics of mānuka honey.

5 Identifying and labelling a food as honey

(13) In this section, we explain the Food Standards Code requirements for labelling a food as honey.

Characteristics of honey

(14) Honey must meet the following characteristics, which are set out in Standard 2.8.2 of the Food Standards Code:

a) A natural sweet substance produced by honey bees from the nectar of blossoms or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which honey bees collect, transform and combine with specific substances of their own, store and leave in the honey comb to ripen and mature; and
b) No less than 60 percent reducing sugars; and
c) No more than 21 percent moisture.

(15) Where a food meets the above characteristics it must be labelled as "honey". A further statement to describe the type of honey can be included on the label, so long as the words do not contradict or detract from the name "honey".

(16) Standard 1.2.2 specifies that the name "honey" must appear on a label. A lot identification number and the name and address of the manufacturer, packer or vendor is required. The address must be a physical address not a post office box, website or email address.

Note: Honey should not have a concentration of more than 40 mg/kg of Hydroxymethylfurfural (HMF) (Codex Honey Standard (Codex Stan 12-1981)http://www.codexalimentarius.org/) throughout the shelf life of the product. HMF levels are not specified in the Food Standards Code, however, high levels of HMF may indicate that the honey has been excessively heated and that this may have impacted on some of the honey's other characteristics (such as colour). Many importing countries have requirements that HMF should not be more than 40 mg/kg. HMF increases over time and should be considered in association with shelf life.

6 Claims made on food

(17) In this section, we explain:

a) background information about making health-related claims on honey and options for selling/classifying honey;
b) what claims are considered therapeutic and are prohibited on labelling;
c) what the transition to a new standard for nutrition, health and related claims means for businesses that are supplying honey for sale;
d) what claims are considered health claims and prohibited on labelling without scientific support;
e) what claims are nutrition content claims and subject to certain requirements; and
f) what other statements can be made on a label.

Health-related claims

(18) The following table provides an indication of the available options and some of the regulatory requirements for classifying and marketing different products.

(19) If a honey is modified and marketed as something other than a food, different label and legislative requirements apply. Businesses should refer to the relevant legislation for the complete requirements. This guide covers labelling requirements for honey sold as a food only.

Classification	Key notes
Food	• Food Act 1981 and Australia New Zealand Food Standards Code • No therapeutic claims or misleading statements • Health Claim - if substantiated and if nutrient profiling requirements are met (see Health Claims) • Do not include dose information • Do not include directions for skin/wound use
Supplemented food Represented as a food that has a substance or substances added to it or that has been modified in some way to perform a physiological role beyond the provision of a simple nutritive requirement.	• Food Act 1981 and New Zealand Food (Supplemented Food) Standard 2013 • "Supplemented food" must be placed in a prominent position on the label • No therapeutic claims or misleading statements • Health claim – if substantiated and if meets nutrient profiling requirements are met (see "Health claims" section) • Cannot be formulated or marketed to children under 4 years • Do not include directions for skin/wound use
Dietary supplement Intended to supplement the amount of the amino acid, edible substance, herb, mineral, synthetic nutrient, or vitamin normally derived from food.	• Food Act 1981 and Dietary Supplement Regulations 1985* • Must be labelled as "dietary supplement" • Sold in a controlled dosage form (liquid, powder, tablet) • Ingested orally • No therapeutic claims or misleading statements

	• Do not include nutrition information panel • Do not include directions for skin/wound use
Therapeutic products	• Medicines Act 1981 and associated Regulations • Therapeutic claims are possible if substantiated • Medicines require consent from the Minister of Health before they can be marketed

** Legislation is currently under review*

Therapeutic claims

(20) Claims such as "Non-Peroxide Activity", "Total Peroxide Activity", "Peroxide Activity", "Total Activity" and "Active" should be removed from labels and advertising.

Note: These claims imply that the product has some form of antibacterial effect when the honey is eaten and are therefore therapeutic claims. The tests used to determine this antibacterial activity only relate to the efficacy of the product inhibiting bacterial growth – i.e. as a topical antiseptic.

(21) Therapeutic claims are prohibited on food products and associated advertising. A claim must not:

(a) refer to the prevention, diagnosis, cure or alleviation of a disease, disorder or condition; or

(b) compare a food with a good that is:

i) represented in any way to be for therapeutic use; or
ii) likely to be taken to be for therapeutic use, whether because of the way in which the good is presented or for any other reason.

(22) The use of grading systems must not be based on parameters which are therapeutic claims or health claims. Please note the example under "Other statements made on a label" on how to correctly use such grading systems.

(23) Therapeutic claims on honey sold as a food make the product a non-compliant food. If businesses wish to make therapeutic claims, they must meet the requirements of the Medicines Act 1981 and not sell the honey as a food. Medsafe is the responsible regulatory body for the Medicines Act.

(24) Provisions are outlined under Standard 1.1.A.2 and Standard 1.2.7

Health and nutrition claims

(25) Standard 1.2.7 - Nutrition, Health and Related Claims, sets out new rules to regulate health claims and nutrition content claims. This Standard was introduced in 2013 with a transition period of three years. During the transition period health claims must comply with either Standard 1.2.7 or the Transitional Standard 1.1A.2. All labels and advertising must fully comply with Standard 1.2.7 from 18 January 2016.

(26) Food businesses should note that Standard 1.2.7 contains no "stock in trade" provision so this means all labels on packs for retail sale need to comply solely with Standard 1.2.7 from 18 January 2016. Because honey is a long-shelf-life food, it is recommended that labels be changed as soon as possible where necessary to comply with Standard 1.2.7.

(27) Both Standard 1.1A.2 and Standard 1.2.7 prohibit therapeutic claims being made on food products (discussed above).

Health claims

(28) Health claims can only be made on honey if it meets:

a) the nutrient profiling scoring criterion; and
b) the conditions of an applicable pre-approved health claim set out in Standard 1.2.7; or
c) the requirements of a self-substantiated health claim set out in Standard 1.2.7, Schedule 6.

Note: Honey does not meet the nutrient profiling criterion because of its high sugar content. Currently no health claims can be made on honey under Standard 1.2.7. Businesses can use the nutrient profiling scoring calculator available at:
http://www.foodstandards.govt.nz/industry/labelling/pages/nutrientprofilingcalculator/Default.aspx

Businesses with products that meet the requirements of applicable pre-approved health claims or have self-substantiated a health claim and wish to make such claims on their product, could apply to FSANZ to see if honey could be exempt from the nutrient profiling scoring criterion or for the categorisation of honey to change. This would be considered a change to the Food Standards Code. Information on this process is available on the FSANZ website. Please note that a formal application and substantial supporting information is required.

(29) Provisions are outlined under Standard 1.2.7. Provisions under Standard 1.1A.2 are not included as this Standard will be revoked on 18 January 2016 and businesses need to comply with Standard 1.2.7 as soon as possible, due to the long shelf life of honey.

Nutrition content claims

(30) Nutrition content claims are permitted on honey. Nutrition content claims are claims about:

a) the presence or absence of:

i) a biologically active substance; or
ii) dietary fibre; or
iii) energy; or
iv) minerals; or
v) potassium; or
vi) protein; or
vii) carbohydrate; or
viii) fat; or
ix) the components of any one of protein, carbohydrate or fat; or
x) salt; or
xi) sodium; or
xii) vitamins; or

b) glycaemic index or glycaemic load;

that does not refer to the presence or absence of alcohol, and is not a health claim.

(31) Businesses can review the nutrition content claims included in Standard 1.2.7, Schedule 1 to see if their product meets the required conditions. For example, some honey can claim to be “low sodium”.

(32) Other nutrition content claims, not included in schedule 1 are permitted, however they may only state:

a) that the food contains or does not contain the property of food; or

b) that the food contains a specified amount of the property of food in a specified amount of that food; or

c) a combination of (a) and (b).

(33) A nutrition content claim also triggers a requirement for the claimed substance to be declared in the Nutrition Information Panel.

Note: The definition for a biologically active substance is provided for in Standard 1.2.8 and means a substance, other than a nutrient, with which health effects are associated. Therefore, to claim a substance is a biologically active substance (when consumed), a health effect would need to be demonstrated.

(34) Provisions are outlined under Standard 1.2.7.

Other statements made on a label

(35) Other statements can be made on food, so long as:

a) the statement is not a therapeutic claim, health claim, nutrition content claim or other claim which has requirements defined in the Code;
b) the statement is truthful, accurate and is not misleading or deceptive in any way; and
c) the statement can be substantiated.

(36) Information on substantiating statements or claims is available from the Commerce Commission at: http://www.comcom.govt.nz/fair-trading/changes-to-the-fair-trading-act/fact-sheets/unsubstantiated-representations/

(37) The following are examples of statements that are acceptable to use, if the requirements above are met. These are examples only, intended to guide businesses in developing their own claims to assist with marketing their product. Inclusion in this list does not imply MPI endorsement.

Examples of acceptable labelling	Additional criteria to be met
Product of New Zealand	New Zealand was the country of origin of all the essential constituents of the final product; and All or virtually all processes involved in the production or manufacture were carried out in New Zealand.
100% New Zealand	New Zealand was the country of origin of all the essential constituents of the final product; and All or virtually all processes involved in the production or manufacture were carried out in New Zealand; and The final retail packaging was carried out in New Zealand.

Packed with care in a New Zealand pack house	Honey is packed in New Zealand following good manufacturing practises.
Honey from (name area) of New Zealand	Beehives from which the honey was collected are situated in area named.
Presence of a chemical marker. For example – this could be expressed as 250 mg/kg methylglyoxal content	The content level claimed must be retained throughout the shelf life of the product.
Pollen count	Mānuka/kānuka pollen should be expressed as a percentage of all pollen present. In addition, total pollen per 10g of honey may be noted on the label.
Grading system	A grading system is not an identifier of mānuka-type honey, but rather is a system to illustrate different grades of honey. Parameters associated with product grading should be meaningful, able to be verified, declared and explained on the label. This will help ensure the grading system is not misleading.The level of the content parameters claimed must be retained throughout the shelf life of the product.

7 Other labelling requirements

(38) In this section, we explain other labelling requirements affecting honey for sale. This includes:
- a) mandatory warning and advisory statements;
- b) labelling of ingredients;
- c) date marking;
- d) directions for use and storage;
- e) nutrition information requirements;
- f) legibility requirements;
- g) characterising ingredient;
- h) compositional requirements; and
- i) advertising.

Mandatory warning and advisory statements

(39) If royal jelly, pollen or propolis is added to honey, this must be declared in the ingredients list and the appropriate warning or advisory statements added to the label. These are as follows:

a) A mandatory advisory statement is required for bee pollen presented as a food, or a food containing bee pollen as an ingredient. The statement must be to the effect that the product contains bee pollen which can cause severe allergic reactions.

b) A mandatory advisory statement is required for propolis presented as a food, or food containing propolis as an ingredient. The statement must be to the effect that the product contains propolis which can cause severe allergic reactions.

c) A mandatory warning statement is required for royal jelly when presented as a food, or food containing royal jelly as an ingredient. The applicable statement is prescribed under Standard 1.2.3 and must be expressed in these exact words. The type size is specified in Standard 1.2.9 (see legibility requirements).

(40) No specific statement is prescribed by the Food Standards Code for the mandatory advisory statement requirement for bee pollen or propolis, so operators may use their own words for this statement as long as they convey the intended effect. They should, however, adhere to the legibility requirement under Standard 1.2.9, for such statement to be "set out legibly and prominently such as to afford a distinct contrast to the background" and in the English language.

(41) Provisions are outlined in Standard 1.2.3

Labelling of ingredients

(42) Generally ingredients lists are not required for a single ingredient food such as honey. If other ingredients such as pollen, royal jelly, etc are added, this would trigger the need for an ingredients list which lists ingredients in descending order of ingoing weight.

(43) Provisions are outlined in Standard 1.2.4

Date marking

(44) Generally date marking is not applicable to products with a shelf life of over two years. If optionally applied use "Best Before" rather than "Use By". When using a "Best Before" date the date must consist of at least the month and year for products with a shelf life of greater than three months, expressed in that order e.g. Dec 2015 or 12 2015.

(45) If you include a content statement on your label, the content level must be maintained throughout the shelf life of the product. This may mean that the lowest level should be used on the label. This can include a clarifying statement that the level may increase throughout the shelf life and stated level is a minimum level.

(46) The label must also include any specific storage conditions required to ensure that the honey will keep for the period indicated by the best-before date.

(47) Provisions are outlined in Standard 1.2.5

Directions for use and storage

(48) Honey is not generally required to have storage instructions for health and safety reasons.

> **Note:** This Standard provides for the inclusion of directions for the use of the food for health or safety reasons. In some countries, consumers are warned against giving honey to infants because of the risk of *Clostridium botulinum*. The risk to New Zealand infants (or adults with altered "at risk" gastrointestinal status) from *Clostridium botulinum* spores in New Zealand produced honey appears to be extremely low[1], therefore including statements on labels to warn against this practice is not required. This recommendation will be revised if the disease or import profiles change.

[1] http://www.foodsafety.govt.nz/elibrary/industry/Risk_Profile_Clostridium-Science_Research.pdf. Risk Profile. *Clostridium botulinum* in Honey. 2006.

The New Zealand Ministry of Health recommends that 'honey not be given to infants younger than one year of age. This is to ensure consistency with the New Zealand recommendation not to add sugar or sweeteners to food for infants…'[2].

Exported honey may need to include a warning statement to reduce consumer confusion. The legislation from the importing country should be consulted on this point.

(49) Where content statements are made on compounds that may vary over time are made, shelf lives and storage conditions may need to be stated. Refer to "Date Marking" section above for further information.

(50) If ingredients are added to honey, each ingredient should be assessed to determine the need for directions for the use of the food for health or safety reasons.

(51) Provisions are outlined in Standard 1.2.6.

Nutrition information requirements

(52) Labels on honey for retail sale require a nutrition information panel. There is a prescribed format for the nutrition information panel in the Food Standards Code. See the example below.

Note: Values for the nutrition information panel can be gained from laboratory analysis or food composition tables (see the New Zealand Food Composition Tables).

(53) Other nutrients can be included in the nutrition information panel, if the requirements in Standard 1.2.8 as well as the nutrition content claim requirements under Standard 1.2.7 are met. For example, trans fatty acids can be included as a subcategory under fat (as trans, to be entered under saturated fats).

(54) If a nutrition content claim is made, the nutrient or substance and amount must be included in the nutrition information panel.

Figure 2: Example Nutrition Information Panel for a 500g jar of honey

NUTRITION INFORMATION

Servings per package: 25
Serving size: 20 g

	Average Quantity per Serving	Average Quantity per 100 g
Energy	268 kJ	1340 kJ
Protein	0.08 g	0.4 g
Fat, total	0 g	0 g
– saturated	0 g	0 g
Carbohydrate	15.9 g	79.6 g
– sugars	15.6 g	78.1 g
Sodium	2.4 mg	12 mg

Note: As with other provisions in this guide, importing countries may have different labelling requirements. This can include different requirements for the format and content of nutrition information panels. For example, some countries require the inclusion of trans fat in the nutrition

[2] http://www.health.govt.nz/publication/food-and-nutrition-guidelines-healthy-infants-and-toddlers-aged-0-2-background-paper-partially Food and Nutrition Guidelines for Healthy Infants and Toddlers (Aged 0–2): A background paper - Partially revised December 2012.

information panel.

(55) Provisions are outlined in Standard 1.2.8

Legibility requirements

(56) All labelling must be legible, prominent and in English. Other languages can be included so long as the other language does not negate or contradict the information on the label in the English language.

(57) Mandatory warning statements must be a minimum of 3mm. Equivalent labelling in the language of the export destination country may also be necessary depending on the importing country requirements.

(58) Provisions are outlined in Standard 1.2.9

Characterising ingredients and components of food

(59) As honey is a single ingredient food, the requirement to provide percentages of characterising ingredients does not generally apply.

(60) Businesses can choose to provide percentages of components found in honey on the label if they wish. It is important the values used are accurate, can be substantiated and are maintained throughout the shelf life of the honey. Information should not be displayed in the nutrition information panel, unless the nutrition content claim requirements are met.

(61) Provisions are outlined in Standard 1.2.10

Compositional requirements

(62) This guide focuses on labelling requirements. The Food Standards Code also provides for what can and cannot be added to food.

(63) Foods that do not have a history of use in Australia and New Zealand may require approval by the FSANZ Advisory Committee on Novel Foods. For example, the inclusion of bee venom as an ingredient in honey would require consideration by the Committee. History of use does not include use as a dietary supplement. Information on this process is available at: http://www.foodstandards.govt.nz/industry/novel/Pages/default.aspx

Advertising

(64) Advertisements for food must not contain any statement, information, designs or representations which are prohibited by the Food Standards Code. For example, nutrition and health claims cannot appear in advertising if the requirements set out in Standard 1.2.7 have not been met. Therefore, if something is not permitted on a food label, it is not permitted on the food advertising.

(65) Provisions are outlined in Standard 1.1.1

8 Identifying a food as New Zealand mānuka-type honey

In this section, we discuss:

a) characteristics of New Zealand mānuka-type honey;
b) testing and labelling New Zealand mānuka-type honey; and
c) New Zealand monofloral mānuka honey.

Characteristics of New Zealand mānuka-type honey

(66) Mānuka-type honey contains a proportion of mānuka, but may be multifloral (that is, it also includes other honey types) as well as monofloral. A New Zealand mānuka-type honey is:

a) sourced from known mānuka production areas within New Zealand and at a time that coincides with mānuka flowering; and
b) derived from the nectar of the plant species *Leptospermum scoparium.*

Note: At present fully validated science to distinguish mānuka (*Leptospermum scoparium*) and kānuka (*Kunzea ericoides*) pollen and honey is still progressing. Therefore nectar and pollen from *Kunzea ericoides* may also be present in mānuka-type honey. While mānuka and kānuka are two scientifically distinct species, they are often located in similar habitats and the plants, flowers and pollen appear similar. When robust and practical methods are available to distinguish mānuka and kānuka honey, this will be incorporated into a revised labelling guide, if appropriate.

(67) Manuka-type honey has the following, naturally produced, characteristics:

a) A colour greater than 62 mm pfund.
b) A conductivity range of 347-867 µS/cm.
c) A flavour typical of mānuka-type honey (mineral, slightly bitter).
d) An aroma typical of mānuka-type honey (damp earth, heather, aromatic).
e) Presence of mānuka-type pollen.
f) Presence of dihydroxyacetone (DHA) and methylglyoxal (MG).

Labelling and testing of New Zealand mānuka-type honey

(68) Honey meeting the above characteristics, may use ‘mānuka’ on the label.

Note: The macron above “a” in mānuka is used to assist in pronunciation. However, food businesses can use “manuka” or “mānuka” on food labels.

(69) Analytical testing of mānuka- type honey should be conducted using accredited[3] test methods. Parameters selected for testing (e.g. colour, conductivity, DHA, MG, pollen) should all be tested at the same time and sampling protocols should ensure results are representative of the batch of honey.

(70) Businesses are responsible for ensuring that any statements on labels are accurate, that there are reasonable grounds for making these statements and the statements meet legislative requirements. This also includes ensuring that a product will test true to label for its entire shelf life. Businesses should give consideration to the likely changes over time of MG, DHA, HMF and colour levels, and to

[3] In New Zealand, this is IANZ accreditation.

any storage conditions that are applicable for the honey and should label accordingly. Refer to "Date Marking" section above for further discussion on labelling related to content statements.

New Zealand monofloral mānuka honey

(71) The Codex Honey Standard (Codex Stan 12-1981) provides for a honey to be labelled as monofloral (ie "mānuka honey") where it comes wholly or mainly from that particular source and has the organoleptic, physicochemical and microscopic properties corresponding with that origin.

Note: New Zealand is a signatory to the Codex Alimentarius Commission, or Codex, as are nearly all our trading partners. Codex aims to protect the health of consumers and to facilitate the trade of food by setting international standards on foods (i.e. Codex Standards) and other texts which can be recommended to governments for acceptance.

(72) Where honey has been designated according to floral or plant source then the common name or the botanical name of the floral source shall be in close proximity to the word "honey". Where honey has been designated according to floral, plant source, or by the name of a geographical or topological region, then the name of the country where the honey has been produced shall be declared. (Codex Honey Standard (Codex Stan 12-1981),part 6)

Note: Based on currently available data, it is not possible to determine robust, widely accepted and scientifically validated parameters for monofloral mānuka honey. Potential markers have been identified and MPI has commissioned several research programmes to help further refine the criteria for monofloral mānuka. The interim guide will be revised as needed to incorporate this work.