

# AUSTRALIAN HONEY BEE INDUSTRY COUNCIL INC

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## SUBMISSION TO THE STANDING COMMITTEE

### ON AGRICULTURE AND INDUSTRY

### COUNTRY OF ORIGIN FOOD LABELLING

#### INTRODUCTION

The Australian Honey Bee Industry Council Inc (AHBIC) is the peak body for beekeeping in Australia. Its members are:-

Queensland Beekeepers Association Inc. (QBA)  
New South Wales Apiarists Association Inc. (NSWAA)  
Victorian Apiarists Association Inc. (VAA)  
Tasmanian Beekeepers Association Inc. (TBA)  
South Australian Apiarists Association Inc. (SAAA)  
Beekeepers Section – West Australian Farmers Federation (WAFF)  
Honey Packers and Marketers Association of Australia (HPMAA)  
National Council of Pollination Associations (NCPA)  
Australian Queen Bee Breeders Association (AQBBA)  
Associated Members

The Terms of Reference have been used to format this submission

**Whether the current Country of Origin Labelling (CoOL for food) system provides enough information for Australian consumers to make informed purchasing decisions;**

The Australian Honey Bee Industry Council Inc. (AHBIC) would submit that the current Country of Origin Labelling is not satisfactory and cites the following cases.

1. Royal jelly was being imported from China to Australia, packed in Australia then sold overseas as “Made in Australia”. When Japan carried out some analysis on the royal jelly, it was found to contain a chemical banned in Australia. Japan then assumed that Australia was using this chemical in beekeeping in Australia. Australia’s international reputation for clean green beekeeping products was being tarnished by a product that was not produced in Australia.

It could be labeled “Made in Australia” as it was processed in Australia into capsules and then exported as “Made in Australia”. AHBIC has been told this fits the definition as the extender, capsule casing and packaging were Australian.

AHBIC would submit that the product name, in this case royal jelly, should determine if it can be labeled as Australian. As it is imported, it should not be allowed to be called “Made in Australia”.

The irony of this find was that the Australian authorities refused to examine imported royal jelly despite the Japanese finding the chemical residue.

2. In Australia, products can be labeled as made from Australian and imported products. There is no requirement to indicate the percentage of each. So it could be 95% Australian and 5 % imported or it could be vice versa.

The Australian consumer should be able to see what the percentage of each is so that an informed decision can be made as to whether to purchase this product.

3. The labeling of a product to indicate the ingredients needs urgent attention. As a recent example there was a product sold in one of the major supermarkets which was labeled “Bee Bear - Honey and Syrup”. When the ingredients label was examined it reads “Sugar syrup and honey (35%).”

Why is it not a requirement that the first name should be the major ingredient? In this case it is 65% sugar syrup so the product should be labeled “Syrup and honey”. It is assumed that in this case honey was used first to try to cash in on the good reputation of honey.

A complaint was lodged with Queensland Health about this product but AHBIC has been not advised, to date, of any action taken. AHBIC also wrote to the major supermarket concerned but received no reply.

#### Whether Australia's CoOL laws are being complied with and what, if any, are the practical limitations to compliance;

Technically the current laws may be complied with but, as pointed out above, this does not give the consumer enough information to make an informed decision. It also does not accurately reflect the Australian content of products sold domestically or exported.

#### Whether improvements could be made, including to simplify the current system and/or reduce the compliance burden;

To simplify the current system, AHBIC would submit that Made in Australia should only be used if over 50% of the major ingredient, as signified by the name, is an Australian product. AHBIC sees no burden in complying with this recommendation.

Product of Australia should signify that all the ingredients are 100% Australian.

Whether Australia's CoOL laws are being circumvented by staging imports through third countries;

AHBIC is aware of a case where honey was imported from Singapore, relabeled as Australian then exported to the United States of America. This case was prosecuted in the USA.

The same company, in a second case, sent the honey directly from Singapore to the USA and it was marked as Australian.

There are many cases of honey from China being sent to a second country then that honey is exported from the second country as product of that country. As an example, when the USA put a tariff on Chinese honey, suddenly Singapore become a very big exporter of honey with no visible means of being able to produce that honey from their own beekeepers. It was suspected that it was Chinese honey being sent through Singapore and labeled as Singapore product in an effort to beat the tariff imposed by the USA. There is no reason to doubt this may be happening with products coming into Australia.

The impact on Australia's international trade obligations of any proposed changes to Australia's CoOL laws.

AHBIC would see no impacts on Australia's international trade obligations. In fact the reverse is the case where a product will be clearly identified as to its Australian content.

Australian Honey Bee Industry Council Inc.  
2 May, 2014