

# Food Standards Australia New Zealand – Maximum Level for Tutin in Honey

**P1029**

Submission From: Bay of Plenty Branch of National Beekeepers Association Inc

Contact Details: Secretary, [REDACTED]  
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This submission is presented on behalf of the 60 branch members who range from hobbyists to large commercial operators.

We have no issue with the science which states there is bound and unbound Tutin. We have immense difficulty in accepting that a 6 person pharmacokinetic study is sufficient basis for setting any standard. In your own documentation on page 2 of Supporting document 2 you state **“there is considerable uncertainty in extrapolation the findings from a small scale study to an entire population”**. We would therefore ask why are you! This does not safeguard the population at all. With no review of the standard once a limit is set no further work will be done to determine what level is safe so we propose that the limit should not change until sound research can determine where the safe level is.

Regarding a transition period in question 16. Many beekeepers hold honey for a variety of reasons. If only packed honey is exempt from meeting any new level set then this constitutes a double standard. There should be a transition period relating to harvest date of honey not a packing date.

In summary

As an industry we are constantly told by authorities to have our proposals based on sound peer reviewed science. This proposal does not meet this criteria and therefore no change should occur to the current requirements until such time as the science can demonstrate a clear need to do so. 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 sound science.

[REDACTED] [REDACTED]  
Dennis Crowley President