Comments from the Victorian Department of Health, and the Victorian Department of Energy, Environment and Climate Action.

Due date of submission – 17 January 2024

The Victorian Departments of Health and Energy, Environment and Climate Action (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Application A1257 – *Australian Native Bee Honey* seeks to amend the Code to permit the sale and usage of honey produced by stingless bees native to Australia.

From the Food Standards Australia New Zealand (FSANZ) Assessment report it is understood that:

- The Code currently defines compositional requirements for honey produced by honeybees. Honey from native stingless bees cannot be sold in Australia as it does not meet the current definition (not produced by honeybees) and compositional requirements.
- Native bee honey contains at least 2% trehalulose, distinguishing it from honeybee honey which typically only contains traces. The minimum reducing sugar content of native bee honey is 50% (less than in honeybee honey) and the maximum moisture content of native bee honey is 28% (more than honeybee honey). Native bee honey also has a higher water activity than honeybee honey.
- FSANZ's risk assessment concluded that consumption of native stingless bee honey with the proposed compositional requirements is not expected to pose any public health risks to the general population, and that risks to infants and allergic/sensitive individuals would be comparable to honeybee honey.
- Fermentation of native bee honey is a natural occurrence, and natural fermentation could result in accumulation of alcohol within the product. Increased pressure in sealed containers could also occur due to fermentation.
- The harvesting of native bee honey is more challenging than for honeybee honey and the process can introduce microbial contamination. Good hygiene practices (GHP) during harvesting will reduce the risk of microbial cross contamination.
- Based on the risk assessment, FSANZ proposed to amend the Code to create a new standard for stingless bee honey which sets out the compositional requirements, a prescribed name and definition.

The departments support, in principle, the proposed amendments to the Code to include native stingless bee honey. Based on FSANZ's conclusion that there are no public health and safety issues with the proposed amendments of the Code to include honey from native stingless bees, the departments support the progression of Application A1257.

However, the departments are concerned of the increased risk of microbial contamination and illness due to the higher moisture content and greater manual handling in harvesting. Scaling up the processing of this traditional food to a commercial product may increase associated food safety risks. We note microbiological safety data submitted with the application was limited to 21 samples of native bee honey from 10 beekeepers. Only three of these samples were stored at room temperature.

Has FSANZ considered adding process and handling GHP requirements to the Code to address possible fermentation and reduce the risk of microbial cross contamination

during harvesting? The risk assessment states there is no evidence that native bee honey presents a public health risk if beekeepers apply GHP during harvesting and processing. It is noted that processing requirements are included in food codes in countries where native bee honey is commercially sold. The departments would be supportive of this approach.

While the potentially affected standards are within Chapter 1 and 2, has consideration been given to how Chapter 3 and 4 standards would apply in this case given the activities involved with harvesting, bottling and distribution?

The departments also wish to raise the potential risk of pesticide residues in native bee honey, given the different foraging activity of the native bee. Has FSANZ given consideration to this?

The departments are also concerned that the proposed 2% compositional limit for trehalulose in native bee honey may provide opportunity for adulteration to mimic this high value product. Given the minimum and average trehalulose content is higher, would FSANZ consider setting the minimum limit higher to address these concerns?