

So, you want to
sell bee products?

Crispin Boxhall

Bee products covered in this talk:

- Honey (and comb) - business vs home production, preparation for sale, labelling, packaging, premises, cleansing, recalls
- Wax (and honey) in cosmetics etc.

I will not cover:

- Propolis
- Royal Jelly

Honey Production for Sale

- I'll be as brief as I can.....!

References

- Food Standards Australia New Zealand (FSANZ)
 - Chapter 1 - Standards that apply to ALL foods
 - Labelling - New ACCC Labelling Code 1 July 2018
 - Chapter 2 - Individual food standards (2.8.2 Honey)
 - Chapter 3 - Food safety standards
 - Chapter 4 - Primary Production Standards (Honey is not included)
- Home Based Food Business
- Recall - Clause 12 of Standard 3.2.2 Food Safety Practices and General Requirements

Food Standards Australia New Zealand (FSANZ)

Standard 1.2.1 Requirements to have labels or otherwise provide information

Applies to:

- a retail sale of a food; and
- a sale of a food that is not a retail sale, if the honey is sold as suitable for retail sale without any further processing, packaging or labelling.

“Country of Origin” requirement will be removed from this Standard with effect 1 July 2018. But is to be incorporated into a new Standard 1.2.11

But what do we mean by "sale"?

- (a) barter, offer or attempt to sell; or
- (b) receive for sale; or
- (c) have in possession for sale; or
- (d) display for sale; or
- (e) cause or permit to be sold or offered for sale; or
- (f) send, forward or deliver for sale; or
- (g) dispose of by any method for valuable consideration; or
- (h) dispose of to an agent for sale on consignment; or
- (i) provide under a contract of service; or
- (j) supply food as a meal or part of a meal to an employee, in accordance with a term of an award governing the employment of the employee or a term of the employee's contract of service, for consumption by the employee at the employee's place of work;
- (k) dispose of by way of raffle, lottery or other game of chance; or
- (l) offer as a prize or reward; or
- (m) give away for the purpose of advertisement or in furtherance of trade or business; or
- (n) supply food under a contract (whether or not the contract is made with the consumer of the food), together with accommodation, service or entertainment, in consideration of an inclusive charge for the food supplied and the accommodation, service or entertainment; or
- (o) supply food (whether or not for consideration) in the course of providing services to patients or inmates in public institutions, where 'public institution' means 'public institution' as defined in the Act, if it is so defined; or
- (p) sell for the purpose of resale.

When the honey for sale must bear a label

1. If the honey for sale is in a package, it is required to bear a label with the stipulated information, unless it:

- is made and packaged on the premises from which it is sold; or
- is packaged in the presence of the purchaser; or
- is delivered packaged, and ready for consumption, at the express order of the purchaser (other than when the food is sold from a vending machine); or
- is sold at a fund raising event; or
- is displayed in an assisted service display cabinet.

When the honey for sale must bear a label

2. If the honey for sale has more than one layer of packaging and subsection (1) requires it to bear a label, only one label is required in relation to the honey for sale. (For example a jar of honey wrapped in presentation cellophane).

3. If the honey for sale is sold in packaging that includes individual packages for servings that are intended to be used separately (*individual portion packs*), but which:

(a) are not designed for individual sale; and

(b) have a surface area of 30 cm² or greater;

then the individual portion pack is also required to bear a label, with the information referred to in subsection 1.2.1-8(3). (For example, selection of honeys in a box, or a hamper of goodies).

4. If the honey for sale is not in a package, it is not required to bear a label.

5. Honey sold to caterers does require labelling.

Food Standards Australia New Zealand (FSANZ)

Standard 1.2.8 Nutrition and Information

A nutrition information panel is **not** required for:

- a standardised alcoholic beverage; (Mead)
- a herb, a spice or a herbal infusion;
- vinegar or imitation vinegar;
- iodised salt, reduced sodium salt mixture, salt or salt substitute;
- tea or coffee, or instant tea or instant coffee;
- a substance that is approved for use as a food additive;
- a substance that is approved for use as a processing aid;
- a food that is sold to be used as a processing aid;
- fruit, vegetables, meat, poultry, and fish that comprise a single ingredient or category of ingredients;
- gelatine;
- water (including mineral water or spring water) or ice;
- prepared filled rolls, sandwiches, bagels and similar products;
- jam setting compound;
- a kit which is intended to be used to produce a standardised alcoholic beverage;
- a beverage containing no less than 0.5% alcohol by volume that is not a standardised alcoholic beverage;
- kava; or
- a food in a small package, other than food for infants.

HONEY NEEDS A NUTRITIONAL INFORMATION PANEL (NIP)

But where can I get this information?

- Never fear. The work has already been done.

- Contact Noel at Quality Beekeeping Supplies

www.qualitybeekeepingsupplies.com and look for the sheets of 48 nutritional labels (\$3.50 per sheet).

Food Standards Australia New Zealand (FSANZ)

Standard 2.8.2 - Honey

Definition:

In this Code honey means the naturally 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.

Requirements:

A food that is sold as honey must:

be honey, and

contain:

- i) no less than 60% reducing sugars; and
- ii) no more than 21% moisture.

Honey is a prescribed name

Food Standards Australia New Zealand (FSANZ)

Standard 3.1.1

- Food premises means any premises including land, vehicles, parts of structures, tents, stalls and other temporary structures, boats, pontoons and any other place declared by the relevant authority to be premises under the Food Act kept or used for the handling of honey for sale, regardless of whether those premises are owned by the proprietor, including premises used principally as a private dwelling, but does not mean food vending machines or vehicles used only to transport food (refrigerated truck).
- Handling of food includes the making, manufacturing, producing, collecting, extracting, processing, storing, transporting, delivering, preparing, treating, preserving, packing, cooking, thawing, serving or displaying of food.

Home-based honey business

- If you're a home-based honey business, you need to meet the same honey safety requirements as other food businesses—regardless of the size of your business or how often you sell honey.

Am I a home-based honey business?

- Home-based honey businesses use their home (or someone else's) to handle honey for sale. This includes preparing honey for local markets or school canteens, catering for events, B&Bs, farm-stay or childcare businesses and online honey sales from home.

Starting or changing a honey business

- If you're starting a new honey business or changing the business name, location or activities of your current honey business you must tell your food enforcement agency (normally your local council).
- A list of food enforcement agencies is available at www.foodstandards.gov.au/enforcement.
- Food safety skills & knowledge
- everyone in your business who handles food must know how to keep it safe to eat
- you or someone in your business may need formal training e.g. a certified food safety supervisor - check with your local council

Do I need to notify?

- No matter how big or small your honey business is, or if it's home-based, online, mobile, a 'once only' activity, or you are using a permanent or temporary premises, you have to tell authorities about your business.
- Even if you're not a typical food business i.e. a chemist, cinema, petrol station or swimming pools - you need to notify authorities if you sell any honey.
- Charities and community organisations generally also need to tell authorities when planning events that involve selling food.

What do they need to know?

- contact details including the business's name, address and owner's name
- business type and size
- foods you make or supply
- details on supplying people at most risk of becoming ill (e.g. children or elderly)
- location of all your home premises in the enforcement agency's area
- for mobile businesses, all sites you work at and/or where you house your van.

How often should I be in touch?

- You generally only need to tell authorities about your business once, as long as the information you gave is still right.
- If there are any changes you must tell the authorities before these changes happen.

Premises design

- Your premises should be designed and fitted out to handle honey safely and avoid contamination.
- Make sure you have:
 - a layout and enough space for people to work without contaminating honey
 - convenient hand wash basin/s with warm running water, soap and single-use towels
 - enough storage to protect honey and packaging
 - floors, walls and benches that can be easily cleaned
 - a supply of drinking-quality water and good light and ventilation
 - a system to safely store and dispose of waste (prevent the spread of bee diseases).
- Check with your local council for advice and to make sure you are set up correctly.

Prevent contamination

- protect honey at all times during storage, processing, transport and display
- thoroughly wash and dry hands before handling honey: use warm running water and soap - scrub wrists, palms, backs of hands, between fingers and under nails, and then dry hands using single-use towels
- do not handle honey if you are ill
- protect honey from pets, children and visitors, sick people, waste, chemicals, pests and dirt

What are the requirements?

Under Standard 3.2.2 - Food Safety Practices and General Requirements

- Honey businesses need to keep their premises, fixtures, fittings, equipment and honey transport vehicles clean and sanitary. This means:
 - things like honey scraps, garbage, dirt, grease etc should not be left to accumulate
 - utensils and surfaces that come in contact with honey should be clean and sanitary.

Cleaning and sanitising

- keep the premises clear of rubbish, honey waste, dirt and grease
- keep honey contact surfaces like benches, utensils and containers clean and sanitary
- clean before you sanitise
- sanitise using bleach, a commercial honey-safe sanitiser or a dishwasher on longest hottest cycle

Cleaning

- Cleaning is removing general dirt, grease and honey waste.
- You need to clean items before you sanitise them.

Sanitising:

- Sanitising destroys microorganisms.
- soak items in very hot water (77C for 30 sec) or in diluted bleach, or
- saturate items with 70% alcohol, or use a commercial sanitiser and follow the manufacturer's instructions, or
- use a dishwasher that can sanitise (usually the longest hottest setting), air-drying is best
- where you can, remove parts like stab mixer sticks and slicer blades to sanitise.

Getting it right

Cleaning:

pre-clean utensils by scraping or wiping
honey scraps off surfaces and rinse with water

wash with hot water and detergent to remove
grease and food residue (soak if needed)

rinse off the detergent.

Tips for using bleach

- use plain bleach to minimise the risk of it contaminating or tainting items
- for cold water, use 100 ppm chlorine - add 10 ml commercial bleach or 25 ml household bleach to 10L water
- for warm water, use 50 ppm chlorine - add 5 ml commercial bleach or 12.5 ml household bleach to 10L water
- contact time is usually 10-30 seconds but check the manufacturer's instructions
- throw diluted bleach away after 24 hours.

Tips for using your dishwasher

- follow the manufacturer's instructions and use the right detergent or sanitising chemical
- scrape or rinse excess honey off before placing in the dishwasher
- place items in a way so that water can reach all surfaces
- use the longest, hottest cycle (or the program designed for sanitation)
- check that items are clean and dry when the cycle ends
- use clean hands to unpack the dishwasher
- clean and service the dishwasher regularly (including filters).

Food recalls

What are the requirements?

- If you're a honey manufacturer, wholesale supplier or importer, you must be able to recall unsafe honey. That means your business needs to:
 - have a written recall plan in place
 - use the plan if a recall is needed
 - show the plan to an authorised officer if asked.
- All honey businesses must make sure that any recalled honey on their premises is clearly identified and held separate from other food until it is dealt with.

Need to recall a honey product?

- Visit foodstandards.gov.au/recalladvice for information on recalls including:
 - a step-by-step guide
 - a checklist and timeline of honey recall tasks
 - a simple template to help you with your honey recall plan.

Getting it right

- Have a recall plan that includes:
 - who will recall your honey and their responsibilities
 - who to contact, including the food enforcement agency where your business's head office is located and FSANZ
 - contact details of everyone the product has been sent to
 - product name, date mark, batch code and other identifiers
 - arrangements for telling your customers and the public (if needed) about the honey, and someone they can contact if they have questions
 - arrangements to retrieve honey that has been returned to supermarkets or other outlets
 - a system to record how much honey was distributed and how much is unaccounted for.

Be prepared

- As a honey manufacturer, wholesale supplier or importer you need to have a written recall plan in place so you can quickly stop distribution and sale of unsafe honey.
- It's a good idea to check that your recall plan works by doing a practice recall.
- Regardless of what type of business you are, you should know where the honey you sell comes from in case it needs to be recalled.

Food Standards Australia New Zealand (FSANZ)

Standard 3.2.2 FOOD SAFETY PRACTICES AND GENERAL REQUIREMENTS

Food packaging

• A food business must, when packaging food

(a) only use packaging material that is fit for its intended use;

(b) only use material that is not likely to cause food contamination; and

(c) ensure that there is no likelihood that the food may become contaminated during the packaging process.

Honey traceability

- Being able to track honey through all stages of production, processing and distribution will make it easier and quicker for you to recall it if something goes wrong.
- keep records of your ingredients and suppliers, and businesses you've sold to
- if you are a food manufacturer, wholesale supplier or importer, have a written recall plan and follow it if a recall is needed.

What does it mean for me?

- You should know the details about the honey on your premises including where it came from and where it goes.
- When receiving honey only accept it if you can identify it and the supplier's name and address in Australia - keep these details.
- If you manufacture, supply wholesale, or import honey you must have a honey recall system in place so if there is a honey safety problem, you know exactly what product should be recalled, how much and from where.
- If you label honey products you need to include the honey's name, lot identification and supplier name and address in Australia.

Recalls

Does my business need a recall plan?

- It is a legal requirement under Standard 3.2.2 of the Code for manufacturers, wholesalers and importers of honey to have a system in place to ensure the recall of unsafe honey. A recall system includes the procedures and arrangements that a honey business has which enable it to retrieve honey products from the honey supply chain if a problem arises. A recall plan is the written document a business produces which details the recall system. Businesses use their recall plan to ensure the recall system in place is followed and complied with.
- Unsafe honey is honey that may cause illness or physical harm to a person who consumes it because, for example, it contains pathogenic microorganisms or physical hazards.

Who initiates a recall?

- The honey business with primary responsibility for the supply of a honey product (you) initiates the action for implementing a voluntary recall. This action may be taken as a result of reports the business receives from any one of a number of sources (e.g. a manufacturer, wholesaler, retailer, government agency or a consumer) which identifies a honey safety problem.
- The Commonwealth Minister responsible for consumer affairs and the State and Territory governments have the legislative power to order a honey product recall where a serious public health and safety risk exists. This is known as a mandatory recall.

Types of Recalls

- A voluntary recall occurs when the sponsor of a honey product initiates the recall and voluntarily takes action to remove it from distribution, sale, and/or consumption. The use of the word 'voluntary' does not correspond to whether or not the distribution network/chains can choose to remove the product from sale. When a recall occurs, all of the particular honey product subject to the recall must be removed from the market place.
- A mandatory recall occurs when the Commonwealth or State or Territory government orders a honey product to be recalled from distribution, sale, and/or consumption. Mandatory recalls will only occur when the honey business will not voluntarily recall its honey product and the honey product is a risk to public health and safety.
- A withdrawal, which is quite separate from a honey recall, is action taken to remove honey from the supply chain where there is no public health and safety issue. A honey product may be withdrawn from sale for two reasons:
 - the honey product has a quality
 - as a precaution, pending further investigation of a potential public health and safety risk
- Withdrawals do not require notification to the government or consumers. If a withdrawal is converted into a recall then notification to government and consumers is required.

Wax (and honey) in cosmetics

- References:

- National Industrial Chemicals Notification and Assessment Scheme (NICNAS)
- Cosmetic and Therapeutic Goods Administration

Wax (and honey) in cosmetics

- A 'cosmetic' is a substance or preparation that is for use on any external part of the human body—or inside the mouth—to change its appearance, cleanse it, keep it in good condition, perfume it or protect it. Cosmetics include soap, shampoo, moisturiser, hair dye, perfume, lipstick, mascara, nail polish, deodorant and many other products.
- Nearly all cosmetic ingredients are regulated as industrial chemicals under the *Industrial Chemicals (Notification and Assessment) Act 1989* (ICNA Act). This includes ingredients described as 'natural', such as oils, extracts and essences of plants.
- If you want to import and/or manufacture cosmetics or cosmetic ingredients for commercial purposes you may need to register your business with NICNAS.

Cont...

- Before importing and/or manufacturing a cosmetic you must check the Australian Inventory of Chemical Substances (AICS) to see if all your chemical ingredients are listed and if there are conditions for using those chemicals.
- If an ingredient is not listed on AICS—or has a condition of use different to your intended use—it is a new industrial chemical to Australia. Unless an exemption applies, the new industrial chemical will need to be assessed by NICNAS for risks to the environment and human health before it can be imported and/or manufactured.

What are Therapeutic Goods

- Therapeutic goods are products that prevent, diagnose or treat diseases, or that affect the structure or functions of the human body.
- View the TGA's definition of therapeutic goods and therapeutic use if you are making such a claim.
- If your product is for therapeutic use read the TGA's regulation basics for more information.

What are Cosmetics

- A cosmetic is a substance that is designed to be used on any external part of the human body—or inside the mouth—to change its odours, change its appearance, cleanse it, keep it in good condition, perfume it or protect it.

Examples of Cosmetics

- Face and nail
 - Products for nail care (including preparations that are applied to the nails to harden or to deter biting of the nails)
 - Products for make up
 - Products for colouring or varnishing nails
 - Tinted bases/foundation (liquids, pastes, powders) without SPF
 - Products for making-up and removing make-up from the face and eyes
 - Products without SPF that are intended for application to the lips
 - Face masks and scrubs

Examples of Cosmetics (cont...)

- Skin care
 - Moisturising products for dermal application eg creams, lotions, gels, foams (without SPF)
 - Sunbathing products (without SPF or SPF <4)
 - Emollients eg creams, emulsions, lotions, gels and oils for the skin (hands, face, feet, etc)
 - Products for tanning without sun (without SPF)
 - Some skin-whitening products (without SPF)
 - Anti-wrinkle products (without SPF)
 - Anti-ageing products (without SPF)

What laws apply to cosmetics in Australia?

- Cosmetics are made from a range of ingredients, which are regulated as industrial chemicals under the *Industrial Chemicals (Notification and Assessment) Act 1989* (ICNA Act).
- Commercial importers and/or manufacturers of cosmetics, including packaged products and chemicals used in the formulation of cosmetic products, must comply with the ICNA Act as well as other legislation.
- If you are producing cosmetics by blending ingredients that are purchased from an Australian supplier, you do **not** need to register your business with NICNAS

NICNAS requirements

All ingredients in a cosmetic product must be listed on the Australian Inventory of Chemical Substances (AICS) or notified to NICNAS for pre-market assessment unless an exemption applies.

All ingredients not on the AICS and notified to NICNAS will be subject to public health, work health and safety (WHS), and environmental risk assessment.

All ingredients not on the AICS and introduced under an exemption from notification and some permit categories are subject to annual reporting and record keeping requirements.

The Cosmetics Standard 2007 describes additional requirements for anti-dandruff products, oral hygiene products, anti-acne products, anti-bacterial skin products, or skin and nail products containing sunscreen as a secondary function.

Cosmetic Products Information Requirement (Labelling)

- NICNAS does not set or enforce labelling requirements for cosmetics in Australia. All suppliers - including manufacturers, importers, distributors and retailers - must comply with the Australian Competition and Consumer Commission's (ACCC) mandatory standard for ingredient labelling on cosmetics.
 - All the ingredients of the cosmetic must be displayed on the packaging in clear, unambiguous print in order from the greatest to the least by volume or weight

What is saponification?

- Saponification involves the hydrolysis reaction of an animal or vegetable fat with an alkali, such as sodium hydroxide, also known as lye or caustic soda.
- The cold-process and hot-process methods of soap making both use saponification.
- Saponification is regarded as the manufacture of an industrial chemical. If you use saponification to make soap, you must register with NICNAS

Who does not need to register with NICNAS?

- You do not need to register with NICNAS if you only make soaps in Australia without a chemical reaction by mixing or blending ingredients purchased from an Australian supplier.

What is mixing and blending?

- Using products such as soap bases, glycerin blocks and melt and pour bases may not involve a chemical reaction because the saponification reaction has already occurred.
- Soap-free cleansers, such as syndet bars, are generally made by mixing the ingredients, without a chemical reaction.
- You should do your own research to understand whether a chemical reaction has occurred in your soap-making process.

Who needs to check the AICS?

- All soap makers must check that every ingredient in their soap is on the chemical inventory Australian Inventory of Chemical Substances (AICS) and whether there are any conditions attached to the use of those ingredients.

Summary

- We have covered:
 - Description of honey
 - Definition of "sale"
 - Labelling
 - Premises
 - Registration of a business
 - Home-based honey business
 - Cleanliness
 - Recalls
 - Packaging
 - Cosmetics vs Therapeutic Goods
 - Labelling of cosmetics
 - NICNAS and registration
 - AICS
 - Soaps