



**National Council of  
Women of New Zealand**

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Wahine O Aotearoa

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S00.52

**Submission to the Australia New Zealand Food Authority on  
Proposal P154 – A variation to Standard K2 – Honey and related products**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 46 nationally organised societies. It has 35 branches spread throughout the country to which women from some 150 societies are affiliated.

The Consumer Affairs Committee of NCWNZ thanks ANZFA for their discussion papers on Proposal P154 – A variation to Standard K2 – Honey and related products – to specify the requirements for royal jelly, bee pollen and propolis, including the need for label warning statements. We are pleased to make the following comments.

As NCWNZ stated in its previous submission on 4 December 1997 – S97.56 – “we believe it is essential that all food products (including dietary supplement products) which contain royal jelly, bee pollen and propolis should have compulsory and adequate warning statements, clearly visible and legible both on the container itself and on any surrounding packaging. Any such warnings should be clear and concise to help ensure they will be easily read and understood”.

We believe this is especially important for those who suffer from asthma and allergies.

**NZ Specific Issues**

1. Should foods and dietary supplements be treated in the same way?

Yes. NCWNZ agrees that both “food and dietary supplements pose the same risks and should be managed to achieve the same outcome”. We agree that the warning statement finalised for royal jelly and the ingredient list requirements for bee pollen and propolis apply to both foods and dietary supplements and as these both pose the same risks they should be managed to achieve the same outcome.

2. Should the food standard for warning statements and ingredient listing be mandatory?

Yes. NCWNZ agrees that the “food standard for warning statements and ingredient listing should be mandatory and that the warning statements contained in NZ Food Standard 1996 Amendment No. 11 should be repealed.

3. As stated in our previous submission S97.56 we believe the word fatalities “may appear to be overstated and cause panic and concern among present and future consumers”. NCWNZ agrees with the proposal to omit this word.

**Conclusion**

NCWNZ endorses the proposal to use the same warning words for both the Standard K2 of the Australian Food Standards Code and the Standard 1.2.3. of the draft Joint Australia NZ Food Standards Code which states “Royal jelly may cause very serious allergic reaction. Asthma sufferers are most at risk”.

Barbara Glenie  
National President

Marie Taylor  
Convener, Consumer Affairs Standing Committee

