

COMMON POSITION PAPER OF 15 BEEKEEPING ASSOCIATIONS

The new Honey Directive – still many issues that need to be addressed

On 24 May, EU Directive 2024/1438 and thus the amendment to the EU Honey Directive 2001/110 was published in the *Official Journal of the European Union*. The member states have until 14 December 2025 to transpose the directive into national law. The provisions will then apply from 14 June 2026. We are pleased with the many improvements, especially the mandatory labelling of all countries of origin and the percentages of each origin. This new requirement, already asked by the beekeepers in Europe for years, improves the transparency on the origins of blended honey, especially for consumers. However, some important issues have been left out of the Directive for future legislation. These issues are important in the fight against honey fraud and therefore in support of the EU beekeeping sector. That's why they need to be responsibly addressed as soon as possible.

4-countries-option

All Member States should reject the option of limiting the declaration of the percentages to the four main countries of origin. All percentages should be declared on the label according to the standard rule!

We welcome the fact that it is now mandatory to declare all countries of origin on the label. However, we are critical of the 4-countries-option to declare only the percentages of the four main countries of origin when they reach more than 50 %. We call on all Member States to waive this option in their national legislation, as for example Austria and Hungary have already announced. It is contrary to the objective of full transparency on the origin of honey, which is also an important part of the prevention of honey fraud. Furthermore, the use of this option may lead to different implementations of the Honey Directive within the EU.

Baker's honey

No consumers' deception with baker's honey!

The new regulation stipulates that baker's honey may no longer be abbreviated to "honey" in the product name of compound foods. We demand that this change is actually implemented and monitored. The possible misuse of the word "honey" instead of "baker's honey" in the list of ingredients should also be monitored. These controls must also entail sanctions, as otherwise they are useless for effective quality control and combating fraud.

EU expert platform

Representatives of the EU beekeeping sector should be involved in the EU expert platform!

According to the new Honey Directive, a platform should be set up to discuss and evaluate the possibilities concerning several topics that are mentioned here. Representatives of the EU beekeeping sector should be fully involved in this expert platform via their interest groups. The discussion on the standardisation of testing methods has been going on for years, but the progress has been very limited. We can't waste any more time.

Reference laboratories

National honey reference laboratories and an EU honey reference laboratory are urgently needed to combat honey fraud!

National honey reference laboratories are necessary to combat honey fraud and to protect consumers. Such a reference laboratory does not have to be a single laboratory. We are in favour of forming consortia or similar forms of coordination to use the already existing expertise of different laboratories.

At the same time an EU reference laboratory is needed to ensure the quality of the methods used, to develop new ones and to create a common database that can be used by all Member States. This is a demand of all beekeepers in Europe. In fact, the responsibilities and tasks of European Union reference centres for the authenticity and integrity of the agri-food chain are already laid down in Art. 98 and Recital 71 of the EU Regulation 2017/625.* Anyone reading this regulation will wonder why this requirement has not already been implemented for the honey sector.

Methods of analysis

Up-to-date methods of analysis are needed to detect honey fraud. The process for standardisation must begin immediately. In the meanwhile, already validated methods must be accepted for respective analyses!

The official methods for testing the authenticity of honey are outdated. Therefore, standardisation of state-of-the-art methods and a common database at EU level are needed. The Joint Research Centre is currently working on the harmonisation of the following methods ¹H-NMR, EA/LC-IRMS, and LC-HRMS to help for European standardisation, but we cannot wait for this harmonisation to be completed before starting the standardisation process. This process must be financed by the Commission and start immediately in order to be able to combat honey fraud with suitable methods as soon as possible to meet the set timeframe of four years.

However, modern techniques are needed already now. It makes no sense to give honey fraudsters another four years or even longer to continue their criminal activity. As already stated in the old version of the Honey Directive, also "internationally recognised validated methods of analysis" can be used. Although the methods of the *Codex Alimentarius* are mentioned in the regulation, they are only given as examples and not exclusive. Some of the methods listed in the *Codex Alimentarius* are outdated and unsuitable for detecting modern methods of adulterations. Validated and internationally recognised methods should therefore also be officially permitted for the detection of adulterated honey if they have proven to be suitable in comparison to the normative methods (specificity, sensitivity, precision, repeatability, reproducibility, accuracy). These include the methods

already mentioned by the International Honey Commission. Furthermore, for example, $^1\text{H-NMR}$. This method can already be carried out by some state control laboratories.

Yet, there is not only one unique method to detect honey adulteration. To avoid false positive, false negative or controversial situations/interpretations, several test methods can be used in parallel to confirm the presence of foreign sugars. We cannot wait several years for these methods to be officially standardised, otherwise counterfeiters will continue to have a free hand in the years to come. We therefore urge all Member States to include already the relevant methods in their legislation and thus demonstrate their commitment to seriously combating honey fraud.

Traceability

A traceability system only makes sense if it goes back to the source – even in third countries!

According to the directive, traceability should extend “at least to the first step within the EU borders”. This limited traceability does not help much in the fight against honey fraud. As the organic sector is already leading the way, traceability should also be possible in third countries to the source. Otherwise, fraud caused by the addition of large quantities of syrup and by changing the declaration of origin in third countries cannot be detected by this system.

For beekeepers who market their honey directly under their own identification, simpler procedures that are already used and mandatory to ensure traceability are sufficient (no extra bureaucratic burden). These include the so-called "honey book" like for example, "Honigbuch" in Germany or "Cahier de Miellerie" in France.

Quality parameters

The introduction of scientifically tested and meaningful quality parameters is important to prevent consumer deception. This is the only way to clearly show the difference in quality between honeys that have been processed or stored in an unfavourable way and those that have been handled with care!

During the negotiation process, we called for the introduction of invertase activity as an important quality parameter. The currently used diastase activity is hardly sensitive to heat and is therefore criticised as a quality parameter in science. Therefore, there should be a minimum value for invertase activity that applies to all honeys. Honey with an unnatural low or no invertase activity should not be marketed or only with a respective information on the label.

It is not a question of whether invertase itself is of nutritional significance, but it shows if the honey was processed and stored carefully. Only if the honey is carefully processed its beneficial properties will be preserved. Honey that has not been carefully processed or has been stored for a long time in inappropriate conditions has greatly reduced beneficial properties for human health. However, honey is consumed as natural functional food and consumers expect these positive properties from honey. It is therefore reasonable to introduce an appropriate value for verification.

Also, certain post-harvest treatments such as pasteurisation are not expected by EU honey consumers, may have an impact on the honey properties and should therefore be declared on the label. If honey quality continues not to be verified by appropriate parameters, this is basically consumer deception, as consumers may not get the product characteristics they expect. Additionally, this situation allows also unfair competition with carefully handled honey.

Explicit ban on ultrafiltration, microfiltration and filter substances such as diatomaceous earth

Honey from which pollen has been removed contradicts the definition of honey in the Honey Directive. The known methods of pollen extraction should be explicitly prohibited!

Ultrafiltration, microfiltration and filtering substances such as diatomaceous earth remove pollen and non-soluble components from honey. This fundamentally contradicts the definition of honey. Ultrafiltration removes even proteins and enzymes (amylases). Technics involving resin technology to “clean” the honey should be clearly forbidden. The final product has absolutely nothing to do with natural honey. To continue to name and label this product “honey” is misleading – or simply fraud.

The previous version of the Honey Directive already required the consistent labelling of “filtered honey”. However, there were hardly any products that were labelled as containing “filtered honey”. This leads to two assumptions:

- 1) the product plays no role on the market and can therefore be ignored or
- 2) the national regulation implementing the Honey Directive is poorly respected or controlled.

However, filtered honey plays an important role in honey fraud to hide its true geographical origin of mixed honey. Moving “filtered honey” to the category of “baker’s honey” does not change the existing problem. It is necessary to ensure that “honey” and “filtered honey” can no longer be mixed to obtain “natural honey”.

We need an explicit ban on these methods. This can be implemented independently of any discussions on mesh sizes!

References for quality parameters and honey consumption

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*** Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products**

Recital (71)

“Official controls and other official activities should be based on analytical, testing and diagnostic methods that meet state-of-the-art scientific standards and offer sound, reliable and comparable results across the Union. The methods used by official laboratories as well as the quality and uniformity of analytical, testing and diagnostic data generated by them should therefore be improved continuously.

For that purpose, the Commission should be able to designate, and rely on the expert assistance of, European Union reference laboratories in all those areas of the agri-food chain where there is the need for precise and reliable analytical, testing and diagnostic results.

The European Union reference laboratories should in particular ensure that national reference laboratories and official laboratories are provided with up-to-date information on available methods, organise or participate actively in inter-laboratory comparative tests and offer training courses for national reference laboratories or official laboratories.”

Article 98

Responsibilities and tasks of European Union reference centres for the authenticity and integrity of the agri-food chain

The European Union reference centres for the authenticity and integrity of the agri-food chain shall be responsible for the following supporting tasks insofar as they are included in the reference centres’ annual or multiannual work programmes that have been established in conformity with the objectives and priorities of the relevant work programmes adopted by the Commission in accordance with Article 36 of Regulation (EU) No 652/2014:

- (a) providing specialised knowledge in relation to the authenticity and integrity of the agri-food chain and to the methods for detecting violations of the rules referred to in Article 1(2) of this Regulation perpetrated through fraudulent or deceptive practices, in relation to the forensic science applied to the areas governed by these rules;*
- (b) providing specific analyses designed to identify the segments of the agri-food chain that are potentially subject to violations of the rules referred to in Article 1(2) of this Regulation perpetrated through fraudulent or deceptive practices and helping to develop specific official control techniques and protocols;*
- (c) where necessary, performing the tasks referred to in points (a) to (h) of Article 94(2) of this Regulation, thereby avoiding duplication with the tasks of European Union reference laboratories designated in accordance with Article 93 of this Regulation;*
- (d) where necessary, establishing and maintaining collections or databases of authenticated reference materials, to be used to detect violations of the rules referred to in Article 1(2) of this Regulation perpetrated through fraudulent or deceptive practices; and*
- (e) disseminating research findings and technical innovations in the fields within the scope of their mission.*

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