



Department
for Environment
Food & Rural Affairs

Honey Supply UK Legislative Overview

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Forestry Commission
England



Environment
Agency

Overview



- Domestic landscape
- Enforcement
- International Standards



Rules controlling honey in England

The Honey (England) Regulations 2015 provide the basis for marketing of honey to consumers but others are also relevant.

- The Food Safety Act 1990
- Retained General Food law 178/2002
- Retained Food Information to Consumers (FIC) 1169/2009
- Other rules: Contaminants, vet medicines, POAO

Largely equivalent honey legislation also applies in Scotland, Wales (& Northern Ireland)

- NIP means EU rules still apply in NI
- EU exit changes for honey - slight differences between the nations relating to blended honey labelling

Directive 2001/110 and Directive 2014/63/EU

- UK requirements largely based on previous EU rules in place before exit. Over time may see divergence.

Honey Legislation

Why have specific rules on honey?

KEY Aims:

- To protect the use of the reserved description “honey” by setting a minimum expected compositional standard for our market
- Consumer protection - instil consumer confidence in UK that the honey is what it says it is
- To create a level playing field for industry and fair trading
- To prevent misleading or fraudulent practices on our market

2015 Honey England Regulations

- Covers Honey from the *Apis mellifera* (European honey bee)
- Lays down reserved descriptions that must be used which relate to:
 - the source from which the honey is obtained (e.g. blossom, honeydew)
 - the processes by which it is extracted (e.g. drained, extracted)
 - the way it is presented (e.g. comb, chunk honey, filtered honey, baker's honey).

Honey Specifications

Honey must comply with set specifications:

1. Range of general quality criteria for honey focussed around its colour, consistency, flavour and aroma.
 - No additions except for other honey, and no pollen or constituent particular to honey may be removed except where this is unavoidable in the removal of foreign inorganic or organic matter
 - Free from organic or inorganic matters foreign to its composition.
 - It must not—
 - (a) have any foreign tastes or odours;
 - (b) have begun to ferment;
 - (c) have an artificially changed acidity;
 - (d) have been heated in such a way that the natural enzymes have been either destroyed or significantly inactivated.

Honey Specifications

2. Set of specific compositional requirements including set prescribed levels for :

- Sugar Content: fructose & glucose content
- Moisture Content
- Water-insoluble Content
- Electrical conductivity
- Free Acid
- Diastase
- HMF

- If you use one of the reserved descriptions as set out in the regulations: your product ***must*** comply with the definitions and above defined compositional criteria.



Honey labelling

- General food labelling rules apply to all honey
- Honey also has mandatory country(s) of origin labelling
- For Blended honey as an alternative to listing the various countries **‘blend of honeys from more than one country’*** (or similar wording) can be used.

*New wording applies in England, Scotland and Wales from 1 Oct 22; Scotland additionally allows regional descriptors so EU/ Non EU terminology allowed

**Northern Ireland adheres to EU rules so must use Blend of EU/ Non EU honey etc

- Optional labelling
 - A **floral or vegetable** origin but it must come wholly or mainly from that source and possesses the organoleptic, physico-chemical and microscopic characteristics of the source
 - A **regional, territorial or topographical** origin but it must come entirely from that origin

NB In England and Wales Regional descriptors such as EU/Non EU origin could be additionally used under the optional alternatives to ensure a label complies with ALL nations requirements for imports

Honey Enforcement

- FSA have oversight for food enforcement policy
- Rules are enforced on the ground by local authorities such as TSOs, EHOs, PHAs who adopt a risk-based approach on enforcement.
- Improvement notice approach with backstop criminal sanctions for failure to comply.
- Product of Animal Origin (POAO) - imports subject to mandatory checks (100% documentary; 15% min additional checks) by PHA
- Key quality indicators (HMF, diastase etc) are set in honey rules ; other non permitted additions such as added sugars are not specifically provided for but implicit in the rules;

“No pollen or constituent particular to honey may be removed except where this is unavoidable in the removal of foreign inorganic or organic matter”

- Honey is a complex matrix and analysis can be challenging
- A weight of evidence approach is recommended for determining if exogenous sugars are present - traceability checks / follow up investigations.

International Honey Standards

CODEX STANDARD FOR HONEY - CODEX STAN 12-1981

- Adopted in 1981; revised 1987 and 2001 under the auspices of the **Codex Committee on Sugars (CCS)**
- The **Codex Alimentarius Commission (CAC)** is a Food and Agriculture Organisation (FAO) / World Health Organisation (WHO) sponsored body charged with the development of food standards **to protect the health of consumers and ensure fair practice in international trade of food and agricultural products.**
- **UK hold the chair of the CAC currently.** Input to Codex standards is important as they serve as a basis for national law in many cases. Codex standards can be referred to by the World Trade Organisation (WTO) to **settle disputes** between countries.

Codex Honey Standard



- applies to all honeys produced by honeybees and covers all styles of honey presentation which are offered for direct consumption.
- Establishes naming, chemical properties, level of contaminants, and labelling of honey, and other characteristics.
- Its coverage is wider than EU directive – given its international focus and covers honey obtained from honeybees and is not exclusive to *Apis Mellifera* (*European honeybee*)
- Origin labelling is optional
- Industrial honey – to be developed



Other work on honey standards

- **ISO/ BSI** - Bee Products Committee - new work on developing standards for honey; work on definitions, terminology and analytical methods
- **CEN** – focus on methods and authenticity
- **Country** specific rules: EU, US, Australia, New Zealand...

Interested Parties which help shape honey rules in this area include:

- BBKA - British beekeepers
- BBFA - British Bee Farmers
- HIPA / Honey Association - UK honey packers
- Apimondia - International beekeepers associations
- EPBA - European Professional Beekeepers
- Copacogeca - European Bee farmers

Any follow up Questions or Queries

Feel free to contact me by:

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Thank you very much for listening

