

“CDG ANIMAL PRODUCTS – SECTOR SHEEP&GOAT AND BEEKEEPING”

18 June 2021



REGULATIONS

Regulation (EC) No 178/2002: “Food Law”

Regulation (EU) No 2017/625: “Official Controls”

Regulation (EU) No 1169/2011: “Food Information to Consumers”

Council Directive 2001/110/EC: “Honey Directive”

Commission Decision 2011/163/EU: “Countries authorised to export to the EU”

Regulation (EU) 2020/2235: “Health certificate for import into the EU”

⁽¹⁾ Text with EEA relevance

Legal framework

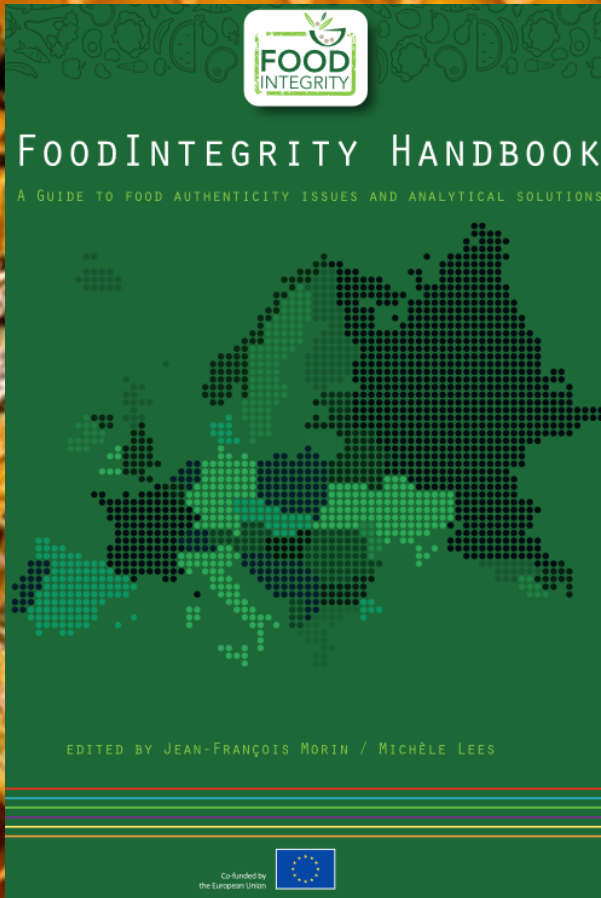


Caveats

- EU honey definition ≠ Codex definition ≠ Custom definition
- Regulation (EU) 2020/2235 refers to the HS code and to honey and honey-bee products
- Regulation (EU) 2020/2235 relates to the basic hygiene rules (HACCP) and requires guarantees on residues but does not refer to authenticity
- Operators in (EU and in) third countries are not approved: this hinders the capacity to order reinforced checks in case of non-compliance
- Physico-chemical methods applied to check the quality criteria of honeys as laid down in Directive 2001/110/EC are of limited value to detect and prove admixtures of foreign sugars to honey.
- No official reference databank

⁽¹⁾ Text with EEA relevance

Authenticity issues



Intentional addition of (cheap) sugars and sugar syrups (corn, cane sugar, beet sugar, rice, wheat, etc.).

Feeding hives during a nectar flow.

Honey moisture content (addition of water, harvesting of immature honey).

Illegal use of resin technology for filtration.

Mislabelling of botanical source (incorrect description of blossom and honeydew honey, incorrect description of floral source).

Mislabelling of geographical origin.



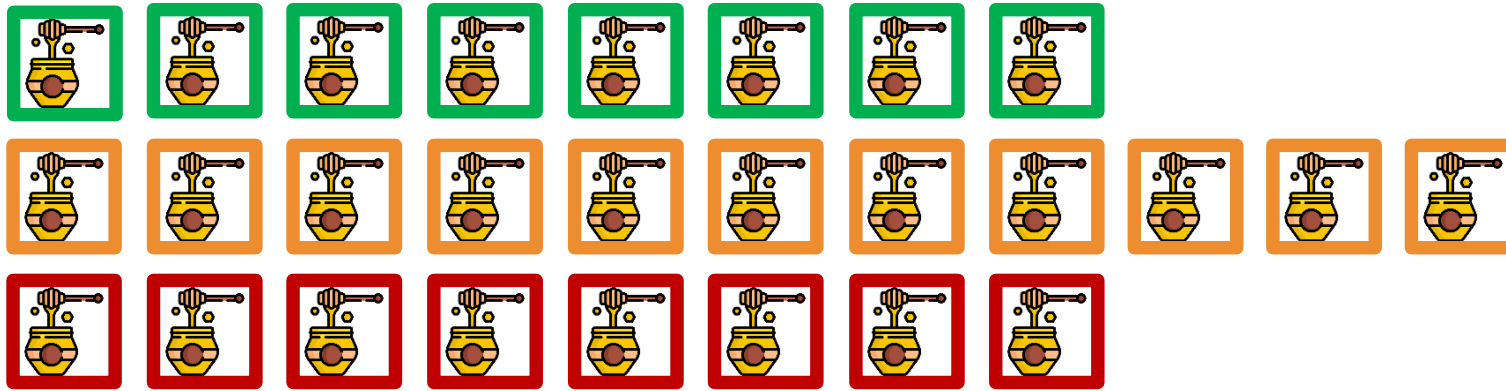
Honey adulteration

Unscrupulous operators increase their shares by proposing “honey” diluted with lower price extraneous sugars.

14.2% of the 893 honeys analysed in EUCCP 2015 were suspicious or containing added sugar syrups.

Among 51 FF notifications & 72 AA notifications (Nov. 2015 – Apr 2021) 28 & 7 relate to sugar profile anomalies.

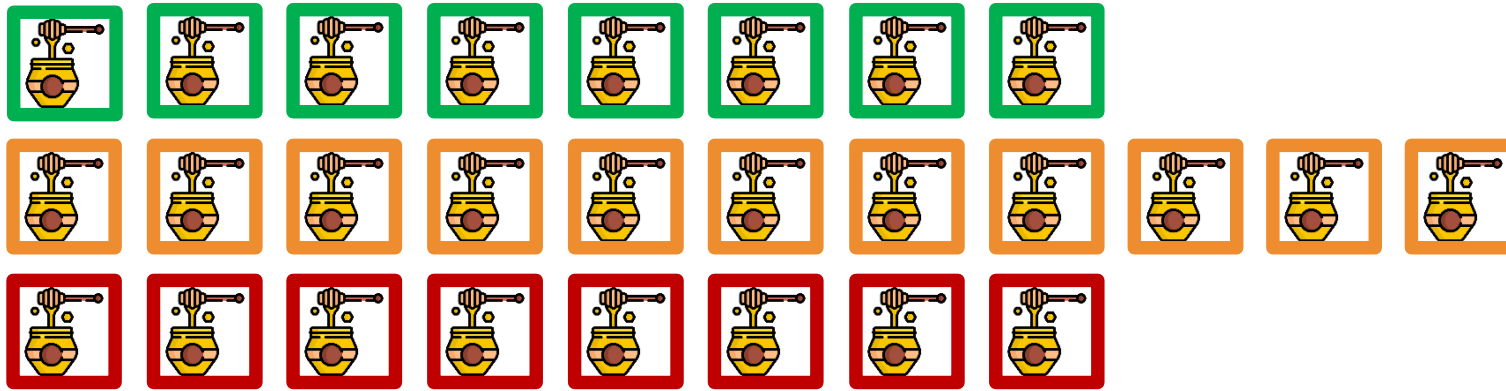
Backstage ...



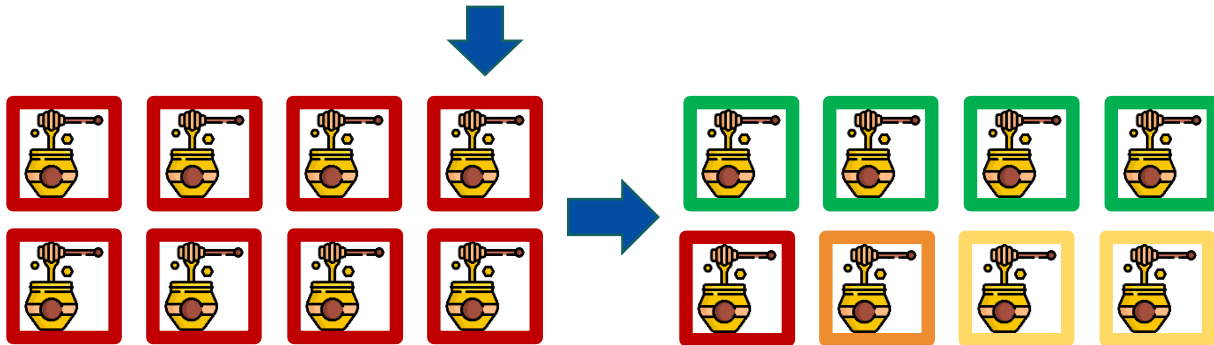
LC/HRMS method

8 out of 27: “Authentic”
11 out of 27: “Possible adulteration”
8 out of 27: “Suspicious”

Backstage ...



LC/HRMS method



LC/HRMS method

8 out of 27: “Authentic”
11 out of 27: “Possible adulteration”
8 out of 27: “Suspicious”

4 out of 8: “Authentic”
1 out of 8: “Possible adulteration”
1 out of 8: “Traces of possible bee feeding
or possible adulteration”
2 out of 8: “Traces of possible bee feeding”