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COPA AND COGECA'S REACTION TO THE PRELIMINARY RESULTS OF THE COMMISSION'S COORDINATED CONTROL PLAN FOR THE HONEY SECTOR

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The presence of adulterated honey on the market is extremely damaging and directly affects both beekeepers' incomes and the reputation of honey itself. Copa-Cogeca therefore sent a letter to Commissioner De Gucht on 26th June 2013 concerning honey imports from China. Since then, DG SANTE has established an extensive control plan to tackle honey adulteration.

Although the definitive results of this control plan have not yet been published, the preliminary results reveal that the situation is indeed grave, with almost 20% of all honey being mislabelled. All 28 Member States, together with Switzerland and Norway collected 2,237 samples of honey. 19% of these samples were found not to comply with their label and 13% were of a suspicious nature. The breakdown of the samples is as follows:

- **2%** of the samples were taken at **border crossings** - **2% of these were non-compliant** and **29% suspicious.**
- **15%** of the samples were taken from **producers** - **15% of these were non-compliant** and 10% suspicious.
- **11%** of the samples were taken from **importers or wholesalers** - **19% of these were non-compliant** and 9% suspicious.
- **14%** of the samples were taken from **packaging or processing plants** - **17% of these were non-compliant** and 8% suspicious.
- **58%** of the samples were taken from **retailers or traders** - **10% of these were non-compliant** and 8% suspicious.

The Commission and Joint Research Centre are now carrying out more in-depth analyses, yet, due to the high number of suspicious samples, the number of cases of non-compliance could still rise. **It is therefore imperative to establish an action plan to make the market more transparent by removing products that tarnish the image of honey and that undermine the profitability of beekeeping.**

An effective action plan must span several levels, ranging from local to international.

Below is a list of measures advocated by Copa-Cogeca:

- For farmers, packagers and other operators in the chain - it is necessary to develop a traceability system to clearly identify the origin of honey in kegs or other bulk containers. This would provide greater market transparency. However, in order to avoid an excessive administrative burden, this honey traceability system for batch production (before packaging) should include information on the beekeeper, identified by his/her national identification number or full name and address of the farm (including the country); the batch number (and/or type of honey); and the year of production.
- Local level - in order to better monitor the geographical origin of honey and avoid imported goods being sold under a different honey label, the packaging and wholesale stages of the chain should be considered as control points with a potential risk. What's more, in several Member States, such as Italy, the majority of tests are carried out on producers' honey as opposed to honey placed on the market after packaging. It is however fundamental to place a greater focus on honey sold in supermarkets.
- For beekeeping organisations and beekeeping programmes - there should be more of a focus on awareness raising campaigns to remind beekeepers of good feeding practices that stop the feeding syrup getting into the super.

– National level - as it stands, the Member States' mandatory control plans focus on testing for residues of veterinary medicinal products and fail to cover quality and origin. It is therefore essential to amend the spectrum of analyses carried out by the Member States to start detecting cases of fraud as well.

– European level - the JRC must establish reliable and harmonised analytical methods that can be applied by a large number of laboratories. There should also be a focus on developing new, more efficient techniques. This would make it possible for the control plans to deliver more reliable results and/or provide more keys to interpret the results. Indeed, the figures show that the number of cases of non-compliant or suspicious honey samples that were taken from upstream sectors to retail and trade, i.e. from border crossings, imports, packaging and processing plants, can no longer be found in the data for retail and trade.

  Furthermore, it is vital to set up a European authentication centre for honey. Beekeepers are willing to drop off various samples to such a centre, which would also improve referencing.

– For imports - it is a shame that the samples taken as part of the Commission's control plan did not better account for the large volumes of honey imported. Indeed, the EU is not self-sufficient and imports some 40% of its honey from third countries. Yet a mere 2% of the samples taken came from border crossings. Seeing as a high percentage of these honey samples were suspicious (29%), it would be advisable, at least initially and after the coordinated control plan, to systematise the detection of fraud at border crossing points.

– International level - the main third country that supplies honey to the EU is China, which covers some 50% of total EU honey imports. It is therefore essential to work together with China to develop scientific projects aiming to improve fraud detection in hive products. The FVO should also carry out another visit to China in order to check for veterinary residues and analyse their production methods. Indeed, the FVO should verify whether it is possible to produce honey that complies with the official European definition (similar to the Codex definition of points to check), despite the collection techniques used. At collection, the moisture content of honey must not exceed 20% (point 2 of Annex II to Directive 2001/110). What's more, collecting fresh honey must meet the conditions listed in point 1 of Annex I to Directive 2001/110, i.e. that honey is a "natural sweet substance [...], which the bees [...] dehydrate, store and leave in honeycombs to ripen and mature". Honey must also come exclusively from the nectar of plants (feeding during the honeydew flow period is outlawed). Honey from fed hives and/or that is collected immediately after the bees deposit their nectar into the honeycomb, and which is then dried industrially does not meet these conditions.

In order to achieve the desired results, all of the aforementioned suggestions should be carried out simultaneously and with the involvement of beekeeping structures.