

# What requirements should your product comply with to be allowed on European markets?

Quality management and food safety are core themes on the European market for honey and sweeteners. This includes contamination and adulteration. In the growing niche markets for organic and fair trade products, you must also go through the respective certification schemes.

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## 1. What legal and non-legal requirements must your product comply with?

When exporting your product to Europe, you have to comply with legally binding requirements. All European food legislation is established according to the principles of traceability, risk analysis and precautionary measures.

### Pre-market approval for honey

Legislation of the European Union prohibits honey imported from countries outside the [‘third country list’](#).

If your country is on the ‘third country list’, this means it has established systems for residue monitoring and can effectively prevent honey exports which are not in compliance with European Union requirements.

If your country is not yet on the third country list, but aims to be included, it must develop a Residue Monitoring Plan (RMP).

The RMP guarantees that the honey imported into the European Union does not contain any prohibited residues or veterinary drugs, such as chloramphenicol.

#### Tip:

Your country’s government is responsible for the RMP. The Ministry of Agriculture or a department of that Ministry is usually the responsible authority. If your country is not allowed to export honey to the European Union, approach the relevant authority for your country and convince them to prepare the RMP.

### Food safety - traceability, hygiene and control

Food safety is a key issue in European Union food legislation. The [General Food Law](#) is the legislative framework for food safety in the European Union. To guarantee food safety and to allow appropriate action in cases of unsafe food, your food product must be traceable throughout the entire supply chain.

An important aspect of controlling food safety hazards is defining critical control points (HACCP) by implementing food safety management principles.

In addition, each batch of honey must be accompanied by a health certificate signed and stamped by a veterinary officer authorised by the relevant authorities of the exporting country. A model health certificate can be found in Appendix VI to Annex VI of [Regulation \(EC\) 1664/2004](#).

Exports of sweeteners such as sugar do not require a health or sanitary certificate.

Once your products arrive in Europe, they are subject to official controls.

If European companies or authorities find that the safety of your product can't be guaranteed, they will take the product off the market and will register it in the [European Union's Rapid Alert System for Food and Feed](#).

### **Tips:**

Establish a traceability system and keep samples for each of your suppliers to trace the origin of a product in case of non-conformance.

Keep your facilities clean by setting strict operating procedures, such as cleaning schedules for your processing equipment. Business operators such as processors are required by law to comply with the European Union legislation on hygiene of foodstuffs ([Regulation \(EC\) 852/2004](#)).

Search the [European Union's Rapid Alert System for Food and Feed \(RASFF\) database](#) to see examples of withdrawals from the market and the reasons behind these withdrawals.

Implement procedures based on Hazard Analysis Critical Control Point ([HACCP](#)) principles. Obtaining the actual certification of HACCP is not obligatory.

Prepare a quality manual which describes your measures to control hygiene. Such a manual is an integral part of a quality management system. You will need this when you want to become certified for your quality management system (e.g. HACCP or ISO 22000).

European Union legislation also recommends that honey sector support organisations develop guides for good hygiene practices. These guides should be based on relevant codes of practice of the [Codex Alimentarius](#).

## **Pesticide residues**

The European Union has set Maximum Residue Levels (MRLs) for pesticides in food products, which you can look up in the [Pesticides database](#).

Your honey may, for example, be contaminated by pesticides applied by farmers in the area around your beehives. When bees collect a lot of nectar in areas where farmers have applied excessive amounts of pesticides, the MRL for the applied pesticide may be exceeded.

If you are a producer of sweeteners such as cane sugar, yacon or lucuma, you have full control over pesticides application on your farm and must take measures to prevent their excessive use.

Regulation 396/2005 establishes [Maximum Residue Levels for pesticides in food](#).

### **Tips:**

Refer to the European Union's [MRL database](#) to identify the MRLs that are relevant for your product. There you can find the list of MRLs related to your product.

Send samples of your product to a laboratory for analysis of pesticide residues to determine if these residues are within the limits set by the European Union. If they are not, you must cooperate with farmers to change the pesticides, lower their use or, in the case of honey, move your beehives to another location.

For more information on MRLs, please refer to the [EU Export Helpdesk](#).

## **Genetically Modified Organisms (GMOs)**

Sweeteners made of Genetically Modified Organisms (GMOs) such as cane sugar are currently not authorised for sale on the European market.

If you want authorisation of GMOs for your product, you will need to apply to the European Food Safety Authority for a risk assessment.

The application must comply with [Regulation 503/2013](#).

As of May 2016, no applications for GMO sweeteners had been made. The high costs of necessary research in relation to expected benefits are keeping suppliers of GMO sweeteners from applying.

In September 2011 the European Court of Justice decided that honey with traces of pollen from genetically modified crops needed special authorisation and labelling before it could be sold in Europe. However, since July 2014, the European Parliament has given authorisation to consider pollen a 'constituent' rather than an 'ingredient'. In doing so, honey containing genetically modified pollen will not have to be labelled as containing GMOs when the pollen content is less than 0.9%.

### **Tips:**

If you are currently producing GM cane sugar but want to target Europe, find out if it is feasible to switch to non-GMO cane sugar.

[Subscribe to the newsletter of the European Parliament](#) to stay informed of the developments concerning the marketing and labelling of your GMO-containing products.

## European Union honey legislation

Your honey needs to comply with directive [\(EC\) 110/2001](#). This directive sets European requirements for honey quality standards and labelling. Requirements regarding honey composition are specifically described in the table below.

In addition to these requirements, your honey must comply with the general food and safety regulations which have been mentioned above.

Table 1 Composition criteria for honey

1.1. Fructose and glucose content (sum of both) — blossom honey — honeydew honey, blends of honeydew honey with blossom honey	not less than 60 g/100 g not less than 45 g/100 g
1.2. Sucrose content — in general — false acacia ( <i>Robinia pseudoacacia</i> ), alfalfa ( <i>Medicago sativa</i> ), Menzies Banksia ( <i>Banksia menziesii</i> ), French honeysuckle ( <i>Hedysarum</i> ), red gum ( <i>Eucalyptus camaldulensis</i> ), leatherwood ( <i>Eucryphia lucida</i> , <i>Eucryphia milliganii</i> ), Citrus spp. — lavender ( <i>Lavandula</i> spp.), borage ( <i>Borago officinalis</i> )	not more than 5 g/100 g not more than 10 g/100 g not more than 15 g/100 g
2. Moisture content — in general — heather ( <i>Calluna</i> ) and baker's honey in general — baker's honey from heather ( <i>Calluna</i> )	not more than 20 % not more than 23 % not more than 25 %
3. Water-insoluble content — in general — pressed honey	not more than 0.1 g/100 g not more than 0.5 g/100 g
4. Electrical conductivity — honey not listed below, and blends of these honeys — honeydew and chestnut honey and blends of these, except for those listed below — exceptions: strawberry tree ( <i>Arbutus unedo</i> ), bell heather ( <i>Erica</i> ), eucalyptus, lime ( <i>Tilia</i> spp.), ling heat	not more than 0,8 mS/cm not more than 0,8 mS/cm

5. Free acid — in general — baker's honey	not more than 50 milli-equivalents acid per 1,000 g not more than 80 milli-equivalents acid per 1,000 g
6. Diastase activity and hydroxymethylfurfural content (HMF) determined after processing and blending (a) Diastase activity (Schade scale) — in general, except baker's honey — honeys with low natural enzyme content (e.g. citrus honeys) and an HMF content of not more than 15 mg/kg	not less than 8 not less than 3
(b) HMF — in general, except baker's honey — honeys of declared origin from regions with a tropical climate and blends of these honeys	not more than 40 mg/kg (subject to the provisions of (a), second indent) not more than 80 mg/kg

### Tips:

Issues of honey composition are taken very seriously in Europe and have been reasons for import bans on third countries. Make sure you comply with the composition requirements set by the European Union.

Communicate with your buyers about any specific requirements they might have beyond legislation.

## Maximum Residue Levels (MRLs) for antibiotics in honey

The European Union has set Maximum Residue Levels (MRLs) for antibiotics in honey.

When you treat your bees with antibiotics, you have to make sure that residues of the antibiotics in your honey remain within certain limits.

The importance of compliance is shown by the ban of Chinese honey from the European Union market between 2002 and 2004. Frequent issues with residues of the prohibited antibiotic chloramphenicol in Chinese honey led to this ban.

The EU legislation on antibiotics residues is laid down in [Regulation \(EC\) 470/2009](#), in conjunction with [Regulation 37/2010](#).

### **Tips:**

Determine which antibiotics your beekeepers use and then refer to the Annex of Regulation 37/2010 to [identify the corresponding MRLs](#).

Send samples of your honey to a laboratory for analysis of antibiotics residues to determine if these residues are within the limits set by the European Union. If they are not, you must cooperate with beekeepers to change the antibiotics or lower their use.

## **Pesticide restriction for bee health**

The European Union has decided to ban the pesticides clothianidin, imidacloprid and thiamethoxam. This is because the use of certain pesticides in agriculture is leading to massive decreases in bee colonies, also known as Colony Collapse Disorder (CCD).

More specifically, after extensive research by the European Food Safety Authority ([ESFA](#)), the European Union's proposal targets pesticides used in the treatment of plants and cereals that are attractive to bees and pollinators.

### **Tips:**

See [Regulation 485/2013 on the ban of certain pesticides](#) for more information.

Strict residue monitoring systems in the country of origin play a critical role in the protection of honey's positive image. See the section above concerning residue levels and the way to monitor residues in your honey.

## **2. What additional requirements do buyers of honey and sweeteners often have?**

European importers generally have stricter quality requirements than those prescribed by European Union legislation.

For example, honey importers often apply a maximum HMF (Hydroxymethylfurfural) content of around 10 for non-tropical honeys, instead of 40 as set by European Union legislation.

The initial low HMF content provides room for increases during transport, processing and the honey's shelf-life.

Non-legal requirements cover aspects of quality, environmental and social (labour) issues.

### **Certification of food safety management**

In addition to stricter specifications than those laid down in European Union legislation, buyers often require you to have a certificate for a stringent food safety management system. The most important food safety management systems in Europe in order of importance are [ISO 22000](#), [BRC](#) and [IFS](#).

### Tip:

In [ITC's Standards Map](#) you can identify food safety management standards relevant to your product, review the main features of the selected standards and codes and compare standards' requirements side-by-side. You can also assess your own performance against these standards.

## Documentation

European buyers appreciate detailed product and company documentation. Buyers generally require detailed Technical Data Sheets (TDS) and Material Safety Data Sheets (MSDS). In addition, they will often send their suppliers a questionnaire with questions about the suppliers' setup (self-audit).

When sending your products to Europe, you will need to provide the European customs authorities with the following documents together with the shipment: health certificate (for honey), invoice for importer, commercial invoice for customs, bill of lading, packing list and certificate of origin.

### Tips:

Make sure you have a detailed Technical Data Sheet (TDS) and Material Safety Data Sheet (MSDS) with photos, information on origin and bibliographic references, where available.

Depending on the country of origin, you might need to provide an export license to customs authorities in your own country.

For more information on the relevant documents that you will need for customs in Europe, please refer to the [EU Export Helpdesk](#).

## Representative samples

European buyers usually request samples to verify that your product meets their specifications, including all legislative requirements of the European Union. They analyse these samples in laboratories and will often share results with you when your product does not conform to expectations.

Analysis of samples will determine the suitability of your product for use in certain applications. Therefore, your sampling method must result in samples that represent what you can deliver in the quantities, quality and lead time as specified by the buyer in the contract following approval of the samples.

### Tip:

Always send representative samples of the product you can deliver according to the time frame, quantities and quality required by your buyer. First send a pre-shipment sample and wait for approval from the importer before you ship the order.

## Payment and delivery terms

European buyers require strict compliance with contract terms. In addition to product specifications and prices, contracts usually also include payment and delivery terms.

Payment terms define risks of trade for you and your buyer. European buyers take fewer risks with new suppliers. They expect new suppliers to accept payment after delivery and inspection of the product.

Delivery terms define responsibility for arranging transport of your products to the buyer. European buyers specialised in imports often take responsibility for arranging transport from the port in your (neighbouring) country to their location. Buyers with a focus on other activities, such as processing, often leave this to you.

### Tips:

Take more risks and offer more attractive payment terms to new buyers than to existing buyers. Payment after receipt and inspection of products are most favourable for buyers. Payment in advance poses the most risk to the buyer.

Familiarise yourself with [methods for payment in international trade](#), such as Letters of Credit.

Familiarise yourself with the international delivery terms ([INCOTERMS](#)).

## Kosher and Halal certification

Some European buyers require Kosher and/or Halal certification. Certification allows food manufacturers to use the ingredients in Kosher and Halal products. Although actual demand for Halal and Kosher products is small, demand for certification of compliance with these religious standards is increasing. European buyers aim to prevent exclusion from respective markets.

### Tip:

Only obtain Kosher and Halal certificates when your buyers demand it. The certification procedure is usually short.

## Good Agricultural Practices (GAP)

GAP is not obligatory for agricultural producers such as sugar cane growers, but compliance is recommended. Several definitions exist; these are generally a collection of principles for farm production and post-harvesting processes, with the aim of safe and healthy food.

### Tip:

For more information on compliance requirements, refer to the GAP standards at [Global G.A.P.](#) and the [FAO](#).



## GMO-free certificates

The use of genetically modified crops and their derivatives is a very sensitive topic in Europe. The restriction on these products reflects concerns about food safety and environmental impact. European buyers generally do not want GMO products and often require a GMO-free certificate as proof that your product does not contain GMO constituents.

### Tip:

To reassure your buyers that your product is GMO-free, you can acquire a GMO-free certificate. If your product is organically certified, you will not need an additional certificate: organic certification already serves as a guarantee that the product is GMO-free.

## 3. What are the requirements for niche markets?

In addition to requirements for successfully accessing the European honey and sweeteners market, complying with the following requirements could offer you a competitive advantage and make it easier to find a buyer.

### Organic certification

A small but growing group of European buyers require third-party certification of sustainability. Organic certification in particular is gaining relevance.

To market your food product in the European Union as 'organic', you need to implement organic farming techniques and have your facilities audited by an accredited certifier. These requirements are specified in the [EU Regulation 834/2007](#).

Additionally, [new organic legislation](#) will be implemented in Europe in 2017. The objective of this new legislation is to simplify the old organic legislation. However, rules for organic production and testing will also become stricter. This could especially be a concern for exporters and producers from developing countries with different meteorological, environmental and structural conditions who try to comply with the rules made for European conditions.

Currently, the core requirements for organic beekeeping are as follows:

- Beehives must be positioned in an area with a radius of 3 km, which is free of contamination by chemicals (e.g. from an industrial complex, airport or main road).
- Crops on which the bees feed must not have been chemically treated.
- Artificial feed must carry organic certification.
- Diseases must not be treated with veterinary medicines, only with approved organic substances.
- Bees must not be stupefied while the honey is harvested.
- The hives should be made of natural materials.

### Tips:

Organic certification can provide access to interesting niche markets. However, be aware that few European buyers are willing to pay a significant price premium for organic food products.

For a [full overview of certification schemes in the sector](#), consult the ITC Standards Map.

## Fairtrade certification

European consumers are increasingly concerned about the impact of their consumption patterns on working conditions of producers and local communities. Therefore, [Fairtrade products](#) are becoming increasingly popular in Europe. The notion of Fairtrade supports fair pricing and improved social conditions for producers and their communities.

If you aim to become Fairtrade certified, you will have to comply with the standards of Fairtrade International. One of the main requirements is to have a traceability system in place. See the website of Fairtrade International for the [standards](#).

### Tips:

If you are considering acquiring a Fairtrade certificate, refer to the website of Fairtrade International for information on the standards for [honey](#) and [cane sugar](#). For the certification requirements please refer to the website of [FLOCert](#).

Be aware that many of the environmental and social sustainability issues take place at farm level (which may not be a part of your company). Think about how to assure responsible business at the premises of your suppliers. To test to what extent your farmers are sustainable, you could ask them to fill in the Farmer Self-Assessment by the [Sustainable Agriculture Initiative](#).

For more information on available fair trade, organic and other certification standards for various products, please refer to the [Standards Map of ITC](#). Although sweeteners such as palm sugar are not listed separately, standards for sugar in general are identified. The website also gives a quick-scan of the requirements of the different standards.

## 4. What are the honey-specific requirements for niche markets?

### Monofloral honeys

Monofloral honeys are produced by bees which collect their nectar mainly from one specific type of flower (e.g. Acacia). Through pollen analysis in a laboratory, you can determine whether a honey can be marketed as monofloral.

For many monofloral honeys, pollen from the main floral source must account for around 40% of the total pollen content. However, the minimum amount of pollen from the respective floral source depends on the type of flower, since different flowers produce different amounts of pollen.

### Tips:

If your bees gather their nectar largely from one type of flower, consider marketing your honey as a monofloral honey to fetch a potential price premium. Communicate with your buyer about the specific floral source of your honey and the respective region's characteristics to justify that your honey is monofloral.

You can contact a laboratory to conduct a pollen analysis, but this might not be helpful since the

technical analysis frequently has inconclusive results

## 5. What are the sweetener-specific requirements for niche markets

### Bonsucro

In response to the growing group of European buyers who require third-party sustainability certification, [Bonsucro](#) has developed a sustainability standard specifically for sugar.

Examples of the issues covered by the Bonsucro standard include respecting human rights and labour standards, active management of biodiversity and ecosystem services, and commitment to continuous improvement of key areas in the business.

Certification of compliance with the Bonsucro standard is particularly relevant when you supply sugar to the mainstream market. When you target specific segments of the market with an interest in sustainability, organic and Fairtrade certification are interesting alternatives.

#### Tip:

Become a certified Bonsucro member by obtaining production and/or Chain of Custody certificates. Check the website of [Bonsucro](#) to understand the possibilities for membership as a supplier.