

# What requirements must honey comply with to be allowed on the European market?

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Quality management and food safety are key issues in the European honey market.

Preventing contamination and adulteration, as well as ensuring adequate product quality are essential for entering the market successfully. Organic, Fairtrade, and monofloral honeys are growing niche markets within the European honey sector. If you want to export honey to any of these markets, you should expect additional quality specifications and certification schemes requests from your buyer.

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## 1. What are mandatory requirements for honey?

To export honey to Europe, you need to comply with a number of requirements. As honey is mainly used as food, you need to comply with EU food legislation, which is based on the principles of hygiene, traceability, risk analysis and precautionary measures. It is also necessary to comply with the [EU Honey Directive](#), which is the most important piece of legislation specific to honey. The Honey Directive's main objective is to preserve the purity of honey as a raw and unprocessed agricultural product, excluding any change in its chemical composition.

### General Food Law

To enter the European food market, you need to comply with several regulations that guarantee food safety. One of these is the [General Food Law \(Regulation \(EC\) No 178/2002\)](#). This law mainly sets requirements for traceability, hygiene, and control. Compliance with this legislation ensures that your honey is safe to consume and that legal limits for food contaminants are not exceeded.

European importers, buyers and manufacturers have a responsibility to check that certain standards are being met throughout the honey production and distribution processes. Honey importers are legally required to ensure that the [honey they are trading complies to EU marketing standards](#) and correctly identify its nature, composition and place or country of origin. As such, buyers will request that you [meet certain traceability and food safety requirements](#). They will most likely expect you to provide [records demonstrating the origin of all products](#). However, it is important to understand that these requests are part of the business agreement, not rules set by the government.

### Hygiene

Hygiene and food safety are of critical importance in EU legislation. The EU General Food Law establishes that [only safe food can be placed on the EU market](#). If food is unsafe, it must be withdrawn or recalled, and competent national authorities must be notified.

In addition to the requirements of the General Food Law, you need to comply with several requirements formulated in [Regulation \(EC\) 852/2004](#) on the hygiene of foodstuffs. To ensure that all stages of the production, processing and distribution meet these requirements, European buyers will require suppliers to:

- ensure that primary products are protected against contamination;
- clean and disinfect all facilities and equipment used for primary production and related activities;
- use clean drinking water;
- ensure that staff handling foodstuffs are in good health and are trained on health risks;
- properly store and handle waste and hazardous substances.

Buyers also require suppliers to implement and maintain hygiene practices based on the Hazard Analysis Critical Control Point ([HACCP](#)) principles. Although obtaining the HACCP certification is not a legal requirement, it is considered mandatory to ensure the safe production, storage and transport of food.

## Traceability

EU legislation requires that products should be taken off the market and consumers should be informed in the case of food safety problems. To be able to do so, products must be identifiable and located quickly through a traceability system. Honey must comply with the traceability requirements set by General Food Law as formulated in [Regulation \(EU\) No 931/2011](#). This regulation requires honey importers to be able to identify the suppliers of every imported batch. This means that exporters are expected to label every batch and keep samples for two to three years.

## Controls and cases of non-compliance

As part of its efforts to protect its consumers, the EU carries out regular [official controls](#) at the border and at all further stages of marketing. Cases that are non-compliant with EU legislation are reported through the [Rapid Alert System for Food and Feeds \(RASFF\)](#). In most cases, the products were withdrawn from the market, and European importers will either not pay for the product or request a refund. Food safety issues will also damage your reputation on the market.

In recent years, the RASFF has reported about 20 instances of honey and bee products containing residues of unauthorised substances. Some examples include cases of:

- [Chloramphenicol in propolis extract](#) from China;
- [Enrofloxacin and trimethoprim in honey](#) from Mexico;
- [Oxymatrine in honey](#) from China;
- [Nitrofurantoin in honey](#) from Ukraine;
- [Organic honey stored in non-food grade \(oxidised\) drums](#) from Ukraine.

## List of third countries authorised to place honey on the EU market

Honey and other apiculture products intended for human consumption are only allowed access into the EU if they come from the third countries listed in [Annex I of Legislation \(EU\) 2021/405](#). The listed countries are allowed to export to the European market because they have established systems for testing the quality of honey and can effectively prevent honey exports that are not in compliance with EU requirements. Some [CBI countries](#) are currently authorised to place honey and apiculture products on the EU market, including Burkina Faso, Benin, Ethiopia, Lebanon and Uganda.

The list of third countries is updated annually, so already listed countries and those wishing to be included need to submit a [Residue Monitoring Plan](#) (RMP) every year. The RMP shows how residues are being monitored and guarantees that honey imported into the EU does not contain prohibited residues and veterinary drugs, such as chloramphenicol. Local authorities are responsible for identifying residues of concern and issuing health certificates. The RMP contains information on:

- the local authorities responsible for monitoring residues in honey;
- the legislative framework covering the use of veterinary medicines;
- the approved laboratories and sampling procedures for residue testing;
- the measures in case of noncompliant results.

In compliance with [Regulation \(EC\) No 853/2004](#), honey must come from [approved processing establishments](#) in the authorised countries to be allowed for import. The competent local authorities are responsible for checking compliance with public health requirements. According to [Regulation \(EU\) 2023/2652](#), adopted in September 2023, [honey from establishments not listed after 29 November 2024 will be refused entry](#) into the EU. The aim is to facilitate the traceability of imported honey and to allow EU Member States to target increased controls on establishments suspected of trading in adulterated products.

## Health certificates

Honey is categorised as an animal product in Europe and as such, legislation on animal products applies. As a result, each shipment of honey and apiculture products must be accompanied by a health certificate. A model certificate with explanatory notes and associated requirements is formulated in [Regulation \(EU\) 2020/2235](#). Health certificates shall be completed, signed and stamped by the official veterinarian or certifying officer authorised by the established authorities of the exporting country. The figure below shows the model of the health certificate for the entry of honey into the EU.

Figure 1: Official health certificate for honey and other apiculture products (model 'HON') - Part 1



Source: [legislation.gov.uk](https://legislation.gov.uk), 2020

## EU Honey Directive

[Directive \(EC\) 110/2001](#) is the most important honey-specific law. It seeks to preserve the natural character of honey and limit human intervention that could change its composition. The EU Honey Directive sets out the composition criteria for honey (for human consumption) and the associated labelling requirements. Suppliers need to comply with these requirements before the honey can be placed on the European market. Note that the Honey Directive is used as a guide for EU countries to develop national honey standards. Although national laws will have the same main objectives, there will be slight variations between countries.

It is prohibited to add food ingredients to honey, including additives. Although honey can be adulterated with several substances, [sugar is the most common adulterant](#). Inexpensive sugar syrups are used to increase the volume of honey and lower production costs.

Honey should be free from any foreign matter, whether organic or inorganic. Also, with certain exceptions, it should not have any foreign flavours or odours, nor should it have begun to ferment or have an artificially modified level of acidity. Honey should not be heated in such a way that the natural enzymes are destroyed or significantly inactivated. The Honey Directive also prohibits the removal of the honey's inherent components, including pollen.

When placed on the market as 'honey' or used in any product intended for human consumption, honey must

meet the following requirements regarding its composition:

Table 1: Composition criteria for honey according to the Honey Directive

Feature	Criteria
Fructose and glucose content (sum of both)	> 60g/100g for blossom honey, or > 45g/100g for honeydew honey and related blends
Sucrose content	< 5g/100g* * Higher limits have been established for specific botanical sources, such as French honeysuckle, eucalyptus and lavender.
Moisture content	< 20%
Water-insoluble content	< 0.1g/100g, or < 0.5g/100g for pressed honey
Electrical conductivity	< 0.8 mS/cm, or > 0.8 mS/cm* for honeydew and chestnut honey and blends * Exemptions for some specific botanical sources, such as strawberry tree, eucalyptus, ling heather, manuka bush and tea tree.
Free acid	< 50 milli-equivalents per 1,000 grammes
Diastase activity (Schade scale)	> 8
Hydroxymethylfurfural (HMF) content	< 40 mg/kg
	< 80 mg/kg

Source: [European Commission](#), 2014

Please note that the EU Honey Directive defines honey as “the natural sweet substance produced by *Apis mellifera* bees from the nectar of plants or from the secretions of living parts of plants or excretions of plant-sucking insects on the living parts of plants”. Therefore, the term ‘honey’ cannot be used to name a product composed of an inferior quality product, such as “baker’s honey”. This is [considered a fraudulent practice](#).

The European Commission (EC) is currently revising the Honey Directive to address the [problem of fraud in the honey sector](#). Aiming to improve market transparency and to better inform consumers about the origin, the EC is considering introducing [mandatory labelling of all countries of origin on honey blends](#).

## Contaminants

In addition, honey needs to be free from contaminants that may be hazardous to human health. Honey imported to the EU must comply with maximum residue limits (MRLs). [Regulation \(EC\) 470/2009](#) and the annexes of [Regulation \(EC\) 2377/90](#) establish the MRLs for the use of authorised veterinary drugs, such as anti-biotics, applied to honey bees.

The EC publishes and regularly updates the [Pesticides database](#) on its website. Here, you can check all current pesticide MRLs for food products, in line with [Regulation \(EC\) 396/2005](#). Click on 'products', and type in 'honey' (or code 104000) in the search field to identify the MRLs relevant for honey.

Table 2: Examples of MRLs by residue

Residues	MRLs
Amitraz	0.2 mg/kg
Chloramphenicol	Zero tolerance
Chlorpromazine	Zero tolerance
Coumaphos	0.1 mg/kg
Dimetridazole	Zero tolerance
Flumethrin	Not restricted
Fluvalinate	0.05 mg/kg
Metronidazole	Zero tolerance
Ronidazole	Zero tolerance

Source: [ProFound](#) with data from [FAO](#), 2021 & [European Commission](#), 2023

### Tips:

Visit the [EU Access2Markets portal](#) for more information on import rules in the EU.

Follow the [guidelines provided by HACCP](#) concerning the working space environment. Keeping your facilities clean and setting strict operating procedures will make it easier for your company to comply with EU regulations. You could also prepare a quality manual that describes hygiene measures.

Establish a traceability system (check out this [successful example](#)) and keep samples for each of your suppliers to trace the origin of a product in case of non-conformity.

Send samples of your honey to a laboratory for analysis of residues to determine if they are within the limits set by the EU. If they are not within limits, you must cooperate with beekeepers to change the antibiotics and/or pesticides, limit their use or move beehives to another location.

Your country's government is responsible for the RMP. Usually, the Ministry of Agriculture or a department of that Ministry are responsible. If your country is not allowed to export honey to the EU, approach the relevant authorities and convince them to establish the RMP.

## 2. What additional requirements and certifications do buyers ask for in the honey sector?

European buyers are looking for pure honey that meets the legal requirements and specific taste preferences. Labelling must include detailed information and steel packaging is preferred for its durability. Contract terms are strict and sustainability, while not a priority, can differentiate companies in the market.

### Food Safety

In addition to the mandatory legal requirements concerning food safety, some buyers also require their suppliers to have a food safety management system in place. Some of the most in-demand systems are:

- [ISO 22000](#) – It applies to the entire food chain, from primary production to the final consumer. It is based on the HACCP (Hazard Analysis and Critical Control Point) approach. You can [buy the ISO standard through the ISO website](#);
- [British Retail Consortium Global Standards \(BRCGS\)](#) – This standard applies specifically to food safety in the retail distribution sector. It is more demanding than ISO 22000 and focuses on preventing contamination;
- [International Featured Standards \(IFS\)](#) – This standard focuses on supplier assessment and product traceability. It is widely recognised by leading companies in the food industry worldwide.

These systems help suppliers prevent non-compliance through rigorous management of their food processing.

Figure 2: Examples of food safety management systems



Source: [ProFound](#) from standard websites, 2023

### Quality requirements

European buyers look for pure honey that meets the composition criteria and has a specific taste and appearance depending on its intended use. European importers usually have stricter quality requirements than those required by EU legislation. For example, it is common for honey importers to demand a maximum Hydroxymethylfurfural (HMF) content of around 10 mg/kg for non-tropical honeys, rather than 40 mg/kg as required by law. In this way, they leave a margin for possible increases in the HMF content during honey transport, processing and shelf life.

European consumers and buyers prefer light-coloured and mild-flavoured honeys. Acacia honey in particular is a popular flavour. European buyers and consumers also prefer liquid honeys over cream honeys. Consumers are more willing to try new honeys that are familiar to the ones already available on the EU market. Since consumers are not familiar with darker honeys with stronger flavours, a smoky flavour is a common quality issue. Most buyers find it an undesirable flavour that cannot be solved by blending. Other problems related to non-European honeys are high HMF content and low diastase content. To avoid elevated HMF levels, you should avoid applying heat to the honey. Heat can change the honey and significantly increase the HMF level. Make sure that honey is not exposed to heat during transportation to avoid exceeding the maximum HMF levels,

which could result in the honey being withdrawn from the market.

## Labelling requirements

European buyers often prefer to pack and label honey for retail themselves, as labelling regulations might vary per country. This allows them to create their own product label according to local labelling rules and in the local language.

When exporting honey, it is important to display information about the product and its handling on the outside of the packaging. Labels must include the following information:

- The name under which it is sold;
- The gross and net weight;
- The date of minimum durability, also known as the 'best before' date;
- Any special conditions for keeping or use;
- The name and address of the manufacturer, packager or importer established in the EU;
- Country of origin or provenance;
- Lot marking on pre-packaged foodstuffs with the marking preceded by the letter 'L';
- Drum number (if exported in bulk).

In addition, geographical indications can also be added to the labelling. Geographical indications mainly refer to final products but may also be required for manufacturing ingredients like honey. Currently, geographical indications are often overlooked. However, they continue to be promoted in Europe, as it is a relatively easy procedure that may have a positive effect on the uniqueness of your product.

## Packaging requirements

Honey imported into the EU from third countries is transported in bulk, rather than in retail packaging. Packaging for retail usually takes place within EU borders, before distribution. Most honey is distributed per container of 20,000 tonnes. European buyers prefer to buy their honey in large quantities because shipping large quantities lowers the relative shipping cost per kilogramme. Depending on the quality, uniqueness and price of the honey, some buyers might agree to ship in lower quantities and fill the remaining part of the container with other bee products, such as beeswax.

Buyers typically require metal drums of approximately 200 to 210 litres. These drums must be painted on the outside and lined on the inside to reduce the risk of contamination. Depending on your buyer's preference, you could use beeswax or plastic bags (e.g. polyethylene) for the lining. EU buyers strongly prefer steel drums over plastic drums because of handling and quality. Stainless steel has the best quality, less or no risk of breakage and they offer better protection against contamination. Avoid packaging honey in used drums, as this can lead to contamination.

Figure 3: Examples of containers for honey packaging



Source: [AB's Honey](#) and [Anel](#), 2023

## Social and environmental sustainability

Sustainability is not a priority for importers of bulk honey. The honey sector is not very innovative or dynamic in terms of sustainability. Income generation and low-cost procurement are the primary objectives, while social and environmental sustainability are secondary. The conventional bulk segment is limited to complying with

international standards and regulations set by the [International Labour Organisation](#) on safe working conditions, freedom from forced labour and child labour.

Due to the [European Green Deal \(EGD\)](#), requirements for social and environmental sustainability in the honey industry are expected to gradually increase in number and exigence. The European Green Deal is a set of proposals that aims to reduce greenhouse gas emissions and minimise resource use while achieving economic growth. The EGD calls for higher sustainability standards in primary production and industrial processes of products, so SMEs in third countries will have to collect and provide more information on the products they export to Europe and potentially be audited on this information. For SMEs, this may mean putting in place traceability systems or complying with a voluntary sustainability standard, either a certification scheme or a company's own initiative.

The [Farm-to-Fork strategy](#) is one of the most relevant strategies of the EGD. Within the action plan of this strategy, [the EU Code of Conduct on Responsible Business and Marketing Practices](#) in the Food Sector stands out. The Code of Conduct sets out the actions that can be undertaken to improve and communicate the sustainability performance. It entered into force on 5 July 2021 and is currently a voluntary initiative. However, it will be reviewed and may become a law if the EC decides that the voluntary commitments are insufficient. For companies exporting to Europe, this could mean stricter traceability requirements and [corporate social responsibility \(CSR\)](#) policies.

CSR is one of the ways in which companies can differentiate themselves in the market. A CSR policy often includes environmental and social aspects. Environmental management systems can be based on the international [standard ISO14000](#), but certification is often not required in the honey market. Similarly, the [international standard ISO45001](#) for occupational health and safety and the [SA8000 standard](#) for social conditions can provide a solid basis for improving social conditions, although certification is optional.

Table 3: Most common certifications in the honey sector that meet market requirements

Certification name	Type of certification	Cost for companies	How to get certified?
EU Organic	Organic	Costs vary and depend on set-up, scale, location and non-conformities.	Refer to <a href="#">Regulation (EU) 2018/848</a> to learn more about the legislative requirements. Access the EU Organic <a href="#">list of recognised control bodies and control authorities</a> , issued by the EU.



Fairtrade International	Social sustainability	Access the FLOCERT <a href="#">cost calculator</a> to get an estimation on the costs for getting Fairtrade-certified.	Consult this link to learn <a href="#">how to become a Fairtrade producer</a> . Operators usually undergo a full recertification audit process every one to two years.
ISO 22000:2018	Food safety management system	Certification costs depend on factors such as your company's business activities and location.	You can <a href="#">buy the ISO standard through the ISO website</a> . Always look for an <a href="#">accredited certification body in your country</a> .
British Retail Consortium Global Standards (BRCGS)	Food safety management system	Certification costs depend on factors such as your company's business activities, size and location.	Check the website to see <a href="#">how to get BRCGS-certified</a> . Visit the BRCGS' <a href="#">partner sections</a> to find a certification body.
International Featured Standards (IFS) Food	Food safety management system	Certification costs depend on factors such as your company's business activities, size, location and number of products.	See the 'Roadmap to certification' on the <a href="#">IFS website</a> to learn how to get certified. Refer to the IFS website to find an <a href="#">accredited certification body in your country</a> .

Source: [ProFound](#), 2023

### Tips:

Read our study on [Organising your honey exports](#) to find more information on payment terms, safe packaging and required labelling'.

Check the [ITC's Standards Map](#) to learn more about food safety management standards and certification schemes relevant to your product.

Check with your buyers if they require food safety management certification. Ask them which food safety management system they prefer, as this may differ from buyer to buyer.

Refer to the Global Food Safety Initiative (GFSI) for [more information on internationally recognised food safety management systems](#).

See the CBI study '[The EU Green Deal – How will it impact my business?](#)' for more information on the EU Green Deal and its implications.

### 3. What are the requirements and certifications for the niche honey markets?

The main niche markets for honey are the certified and the monofloral markets. You cannot sell your honey as niche honey if you do not meet the requirements set for these markets. While the extra requirements may increase production costs, you are likely to sell the honey at a premium price.

#### Certified honey

European buyers are increasingly interested in certified honey. Which certification is required depends on the buyer's needs. The two most common certification schemes for bulk honey are [Organic](#) and [Fairtrade](#). It is expected that demand for certified honey will grow. This is due to the planned [Regulation on substantiating 'green' claims](#). This proposal is part of the [European Green Deal](#), which requires companies to support claims about the environmental footprint of their products and services. Specific objectives include creating a standard for providing reliable environmental information and reducing and simplifying the administrative burden of collecting this information, especially for SMEs. It is not yet clear when this law will be adopted, but two options are being considered to change how things are done now:

- a voluntary system where companies opt to make standardised green claims alongside existing methods (e.g. sustainable certification schemes);
- a mandatory EU-wide legal framework requiring companies making green claims to do so in a standardised and verified way.

Certification may not be feasible for all producers and exporters, especially those with limited resources. It is therefore important to realise that many EU buyers place great value on the story behind a product. Thus, it is highly recommended to share your product's story (on origin, production, sustainability projects, etc.) with buyers, whether already certified or not.

#### Organic

You can only export organic honey to Europe when it is certified according to the [EU organic](#) certification scheme. This certification follows the requirements for organic beekeeping set by the [EU's organic regulation](#).

The most important aspects of organic beekeeping are:

- Beehives must be placed in an area with at least a three kilometre radius that is free from major sources of chemical contamination, such as intensive farming activities. This includes the use of pesticides;
- Beehives must be made from natural materials;
- Diseases and pests must be managed using natural solutions instead of chemical antibiotics.

Organic honey is tested more strictly for chemical residues than conventional honey. Buyers of organic honey apply a zero tolerance for pesticide residues and other chemical contaminants.

Note that the use of the terms 'organic' and 'ecological' is only allowed if your honey is certified. Before you can market your honey as organic, an accredited certifier must audit your growing and/or processing facilities. Refer to [this list of recognised control bodies and control authorities](#) issued by the EU to ensure that you always work with an accredited certifier. To become certified, you can expect a yearly inspection and audit, which aim to ensure that you comply with the rules on organic production.

## Fairtrade

To sell Fairtrade-certified honey, you must comply with the standards set by [Fairtrade International](#). The accredited certifier for Fairtrade is [FLOCERT](#). You are allowed to put the Fairtrade logo on your product after accreditation.

One of the main requirements of Fairtrade International is to have a traceability system in place. Fairtrade producers are paid a Fairtrade Minimum Price. The current minimum prices and premiums for honey, whether organic-certified or conventional, can be found in the [Fairtrade Minimum Price and Fairtrade Premium Table](#). Refer to this [full guidance to learn more on how to become a Fairtrade producer](#).

Refer to the [standards webpage of Fairtrade International](#) to find all the requirements you need to meet to get honey Fairtrade-certified.

## Monofloral Honey

Monofloral honey is defined as honey that is made predominantly from the nectar of a single type of flower (e.g. acacia, clover, manuka, etc). [Monofloral honey is considered a high-quality product with a special aroma, a refined and unique taste](#). It sometimes receives a higher price.

The honey industry commonly uses pollen analysis to identify monofloral honey. This is because pollen is unique to each plant species and thus, the amount of pollen can be linked to a specific origin. To determine whether honey can be marketed as a monofloral honey, it is advisable to analyse its pollen contents in a laboratory.

For most monofloral honey types, the pollen from the main floral source should account for at least 40 to 45% of the total pollen content. However, the minimum percentage may vary for certain types of honey, as different flowers produce different amounts of pollen. To help with this analysis, [three categories](#) are identified:

- Underrepresented pollen (with less than 20,000 pollen grains per 10 grams of honey);
- Normally represented pollen (with 20,000 – 100,000 pollen grains per 10 grams of honey);
- Overrepresented pollen (with more than 100,000 pollen grains per 10 grams).

Following this classification, different pollen levels need to be identified in a honey sample to be classified as monofloral honey, depending on the floral source:

- Underrepresented pollen (e.g. coffee) must constitute more than 20% of the total pollen content;
- Normally represented pollen (e.g. clover) must constitute more than 45% of the total pollen content;
- Overrepresented pollen (e.g. rapeseed) must constitute more than 70% of the total pollen content.

Similar to bulk honeys, monofloral honey must comply with the quality specifications as established in EU [Honey Directive 110/2001](#). Compliance with moisture content limits forms a challenge in particular. Beekeepers often need to harvest their monofloral honey crop before the bees start collecting nectar from other sources. This frequently results in the harvesting of unripe honey with a moisture content that exceeds 20%.

In addition to compliance with the abovementioned specifications, monofloral honey must comply with industry standards. However, industry standards are not available for all types of monofloral kinds of honey. Moreover, they are not recognised as standards by all EU importers. Exporters must always verify the specifications

required with their buyers to ensure compliance.

### **Tips:**

Before engaging in any sustainability certification programme, make sure to check that this label has sufficient demand in your target market and is cost-beneficial for your product.

Read our [Product Factsheet on Monofloral Honey in the UK](#) to learn more about requirements for this type of honey.

[ProFound – Advisers In Development](#) carried out this study on behalf of CBI.

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