

Feedback to the draft proposal for a new Honey Directive

Finnish Beekeepers' Association kindly provide some comments for the draft proposal as follow.

Proposed changes for Honey Directive are clear and developing both traceability and quality of honey in the market. National characteristics of honeys should be taken into account while adjusting invertase limit values. We are also strongly in favor of not to increase the cost or workload for beekeepers due to these changes.

THE KEY DEMANDS OF THE COPA-COGECA WORKING PARTY ON HONEY AS REGARDS THE UPDATE TO THE

COUNCIL DIRECTIVE 2001/110/EC OF THE 20th DECEMBER 2001 ON HONEY

In general

- these issues have been under conversation for long. It is great that they have been altered to key demands Eu Council
- proposed amendments are clear/unambiguous and they will help to reduce amounts of adulterated honey on the EU market

Indication of the geographical origin of honey

- proposed amendments are clear/unambiguous and appropriate

Traceability

- proposed amendments are clear/unambiguous
- system for monitoring the traceability have to be run by national authorities
- as stated, the rules governing traceability should not add to beekeepers' administrative burden

(Ultra-)filtration of honey and its place in the market

- proposed amendments are clear/unambiguous
- this is one tool in reducing adulterations from the market

Heat treatment above 50°C (overheating honey)

- proposed amendments are clear/unambiguous
- regarding ANNEX II paragraph 7: Invertase activity for raw honeys This parameter is determined when honey is to be sold commercially. The value of raw honeys whose enzyme content does not fall within the exceptions shall not be below 50 U/kg (Gontarski). This value may be reduced by half for honeys with a naturally low enzyme content.

In Finland there are some honey varieties which have naturally low invertase enzyme content. Those are for example fireweed and raspberry honey (see page 59 in: https://erepo.uef.fi/bitstream/handle/123456789/10469/urn_isbn_978-952-61-0589-5.pdf)

Honey maturation

- proposed amendments are clear/unambiguous
- in Northern Europe countries after rainy or humid summer it is sometimes necessary to place honey in a drier atmosphere before extracting. Vacuum systems are not used. It's good that this is mentioned in directive.

Yours Sincerely,

In Helsinki 16.2.2022

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