

A Sticky Situation: Fraudulent Honey in the EU

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Introduction

In 2022, approximately 1.83 million metric tonnes of natural honey was produced worldwide.¹ The European Union (EU) is the second largest producer of honey in the world after China,² with the majority of Europeans consuming honey on a weekly basis.³ However, even with approximately 19 million beehives within the EU,⁴ the EU is only 60% self-sufficient in terms of honey consumption. This means that the EU relies on the importation of honey from countries outside of the EU as well as the movement of large quantities of honey between Member States. In March 2023, the results of the *From the Hives* EU Coordinated Action Plan (CAP)* were published, where 46% of samples were marked as being “*suspicious of adulteration*”⁵ and thus not in compliance with the EU Honey Directive (2001). As a result, the second EU CAP relating to honey was launched by the EU Agri-Food Fraud Network (the FFN). Food fraud and the use of CAPs is not a new concept for EU Member States, most notably the ‘CAP on Horse meat (2013 – 2014)’⁶ which caused widespread controversy, and most recently the ‘CAP on online offers and advertising of food related to COVID-19’.⁷

This paper considers why honey can be the subject of food fraud in the EU and explores what is being done to prevent fraudulent practices in the honey supply chain. It will also review the effectiveness of the current EU regulations and international cooperation efforts that are designed to detect and prevent honey adulteration and asks what technological and legislative improvements can be deployed to protect consumers and support EU honey producers. The paper starts by exploring the discourse surrounding the relevant legislation in the EU and the promulgation of two CAPs in the past ten years. By considering the experience of Irish honey producers, as well as looking at the wider EU context and what the impacts of fraudulent honey can be, the argument arises that these two CAPs have been essential for getting the EU institutions to take honey and food fraud more seriously, as was showcased by the most recent updates to the ‘Breakfast Directives’.⁸ Interviews for this research project including with an Irish honey producer, a member from the EU FFN, and a leading EU academic on food labelling, took place in July 2024, in order to test the author’s interpretations and to incorporate perspectives from those implementing the updates into legislation and those most affected by it. The paper concludes by looking to the future and how honey fraud might be tackled on a local, national, and international level.

The EU Agri-food fraud network (FFN): How did honey become an issue?

The FFN was established in 2013 in order “*to fight fraud in the agri-food chain, both at national and EU level*”.⁹ The European Commission and liaison bodies designated by Member States, Switzerland, Norway, and Iceland, were brought together to create the FFN, with support from the Commission’s Knowledge Centre for Food Fraud and Quality, the European Anti-Fraud Office (OLAF), and the European Union Agency for Law Enforcement Cooperation (Europol). Food fraud is identified through investigative pathways led by “*officials with EU agri-food chain knowledge, police and customs officers with investigative powers, judges and prosecutors’ administrations*”⁹ in accordance with Official Controls Regulation, which allows for “*controls*” and “*activities*” to be performed “*to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products*.”¹⁰

Article 1(2) of Regulation 2017/625 defines four key operative criteria that must be met in order for a finding of “*suspicion of fraud*” within the agri-food chain to be found. The four criteria are:

- Violation of EU rules
- Deception of customers
- Undue advantage
- Intention

1 Shahbandeh, 2024

2 European Commission, 2024

3 Kleisiari, Kleftodimos and Vlontzos, 2023

4 Directorate-General for Agriculture and Rural Development, 2022

5 Directorate-General for Health and Food Safety, 2022

* not to be confused with the EU’s Common Agricultural Policy, also abbreviated to CAP

6 Directorate-General for Health and Food Safety, 2024f

7 Directorate-General for Health and Food Safety, 2024g

8 Council Directive 2024/1438

9 Directorate-General for Health and Food Safety, 2024a

10 Regulation (EU) 2017/625

The European Commission’s website states the following in relation to food fraud:

“[...] intentional infringements of the EU agri-food chain legislation may hinder the functioning of the EU Single Market and may also constitute a risk to human, animal, or plant health, to animal welfare or to the environment. Fraudulent practices can happen at any stage of production, processing and trade and the purchaser that is the victim can be the final consumer as well as a business operator.”¹¹

At the request of one or more Member States, the Commission “can organise specific targeted activities at EU level”.¹² Cases of suspected fraud or lack of compliance with regulations are then reported back to the FFN. Two such coordinated actions launched by the FFN and coordinated by the Commission since 2013 were:

- Honey (2015 – 2017)¹³
- Honey (2021 – 2022) – From the Hives¹⁴

Coordinated Action Plan 1: Honey (2015 – 2017)

In 2015, the Commission’s first coordinated action plan to monitor and identify potentially fraudulent practices in the honey supply chain (then named a “coordinated control plan”) was launched by the Commission’s Directorate-General Health and Food Safety. This plan was put in place following information from Member States of “the presence on the market, in a potentially significant proportion, of honey that may not meet the composition criteria laid down by Directive 2001/110/EC (EU Honey Directive) and/or that is not the result of the production process required by the legal definition of honey”.¹⁵

From 1 June to 15 July 2015, 2,264 samples of honey were collected from 28 EU countries, as well as from Norway and Switzerland. A three-tiered system was put in place to analyse the samples:

Tier 1: All samples were analysed for sensory characteristics and pollen profiles to measure compliance with relevant provisions of the EU Honey Directive (001/110/EC);

Tier 2: Compliant samples from Tier 1 were then submitted to chemical sugar analysis;

Tier 3: The samples which passed Tier 1 and Tier 2 tests were then sent to the Commission’s Joint Research Centre (JRC) for additional tests specifically targeted at identifying adulteration with added sugars.¹⁶ This involves a combination of stable carbon isotope analysis by elemental analysis-isotope ratio mass spectrometry and liquid-chromatography coupled to isotope ratio mass spectrometry, classified in the JRC report as “state-of-the-art methods for the detection of added sugars” (p.1).¹⁵

From the 2,264 samples, the JRC received 893 samples, some 39%, that were marked as compliant at Tier 1 and 2. At Tier 3, the JRC concluded that 14% of the 893 samples were adulterated with foreign sugars. However, it should be noted that the report also highlights the need for improved detection methods:

“The applied technique (analytical method together with the decision criteria) has not been validated in multi-laboratory studies conducted at the international level. It relies on empirically determined benchmark purity criteria, taken from the published literature so that the selection of honeys used to set the benchmark may influence the compliance decision” (p.2).¹⁵

The JRC outlined the following recommendations relating to the introduction of:¹⁵

- harmonised analytical methods;
- a Biobank (i.e. a centralised repository of authentic samples) of honeys, sugar syrups, and bee feeding products;
- a European honey reference database; and
- systems to validate new and emerging analytical methods.

According to the report, these recommendations would allow for the collection of “comprehensive data”¹⁷ which would aim to protect EU producers and consumers by providing more information on the nature of honey entering the EU’s internal market and thus setting a standard for the produce crossing EU borders.

11 Directorate-General for Health and Food Safety, 2024b

12 Directorate-General for Health and Food Safety, 2024c

13 Directorate-General for Health and Food Safety, 2024d

14 Directorate-General for Health and Food Safety, 2022

15 Aries et al., 2016

16 Directorate-General for Health and Food Safety, 2024d

17 Aries et al., 2016

Coordination Action Plan 2: From the Hives

In October 2021, the European Commission launched the *From the Hives* CAP. This involved the collection of honey samples at border checks to be sent to the Commission's JRC in Belgium. This process aligned with two of the recommendations from the previous Honey CAP, by setting up a "Biobank of honeys, sugar syrups and bee feeding products" and by creating a "European honey reference database" (p.23).¹⁷ The second phase involved tracing the origins of the honey samples and recording the consigned destinations, while also tracking any pre-recorded suspicions of food fraud or non-compliance. Finally, the Member States, Switzerland, and Norway, with support from OLAF, carried out investigations regarding the honey samples' "place of import, processing, blending, and packing into the EU".¹⁸

The *From the Hives* CAP results showed that, based on 320 samples, 46% of honey imported into the EU was adulterated to some degree. The highest number of suspicious samples came from China (66 out of 89 samples), while products from Turkey also returned a high rate of suspicious samples, with 14 out of its 15 samples being highlighted as potentially fraudulent, alongside honey from the United Kingdom which was tested, with all 10 samples coming back as suspicious. In the case of the UK, the JRC Report determined that this was likely due to further processing which took place within the UK after being imported to that country. In total, 57% of the operators investigated from across the EU-wide sample were deemed to be exporting fraudulent honey containing additional sugar syrups. Additional investigation by OLAF found that exporters within EU Member States and exporters from both Member States and Non-EU countries were complicit in the movement of fraudulent honey around the EU.¹⁹

The main malpractices recorded include:

- the use of sugar syrups to adulterate honey and lower its price;
- the adaption of honey/sugar blends to elude possible detection by clients and official authorities before import operations;
- the use of additives and colourings to adulterate the honey's botanical source; and
- the masking of the geographical origin of honey by forging traceability information and by removing pollens.²⁰

The ultimate and stark conclusion of the second Honey CAP was that a large part of honey imported into the EU does not comply with the terms and standards set down in the EU's Honey Directive 2001/110/EC.²¹ This conclusion was formed based on the use of analytical methods with increased detection capabilities. These methods differed to those used in the Honey CAP 2015-2017, which primarily used a process called stable carbon isotope analysis by elemental analysis-isotope ratio mass spectrometry (EA-IRMS). EA-IRMS was previously used to detect maize starch and sugarcane syrups in honey, but was not effective in detecting other syrups such as those made from rice, wheat, or sugar beet. This could explain the higher rate of fraud in the *From the Hives* CAP where the methods used could not only detect the maize starch and sugarcane syrups, but also those from rice, wheat, or sugar beet, making it a more comprehensive analysis.

In sum, according to the JRC report, improved technologies and methods are needed to detect adulterated honey containing sugar syrups and to prevent such products from being imported into the EU's internal market.

Between Honey 2015-2017 and *From the Hives*: Why was there a Round 2?

The question arises, why did a second CAP have to be actioned in 2021 to address the presence of adulterated honey in the EU internal market in the first place?

According to the FFN, the second CAP was initiated due to continued concerns from Member States regarding the presence of adulterated honey within the EU internal market. These concerns were brought to the attention of the Alert and Cooperation Network, a network made up of the Rapid Alert System for Food and Feed (RASFF), the Administrative Assistance and Cooperation Network (AAC), the EU Agri-Food Fraud Network (FFN), and managed by the European Commission. Their role is to "facilitate the exchange of administrative information and the cooperation between Member States on official controls in the agri-food chain."²²

18 Directorate-General for Health and Food Safety, 2022

19 Ždiniaková, T. et al., 2023

20 Directorate-General for Health and Food Safety, 2022

21 Council Directive 2001/110/EC 2001

22 Directorate-General for Health and Food Safety, 2024e

Therefore, it can be argued that the second Honey CAP was not necessarily actioned due to the failure of the first CAP. Instead, the second CAP was actioned because of increasing concerns from Member States and because updated analysis methods became available to the authorities able to carry out a comprehensive study of honey entering the EU's internal market. The Commission was able to use the Alert and Cooperation Network and authorities in Member States to carry out further tests on honey entering the EU and follow up on recommendations set out in the Honey CAP 2015-2017.

From the Hives to Legislative Amendments: What's Next?

The findings of *From the Hives* was then put into the hands of the European Commission who decided on the best course of action to ensure that another CAP would not be needed for honey and to reduce fraudulent honey entering the EU's internal market.

The following observations were outlined on the European Commission's website for how authorities might respond to the results of the second Honey CAP, including:

1. The need to emphasise the obligations of food business operators to comply with EU and national Food Law, as well as following EU marketing standards when it comes to honey. This also includes the need for these actors to take corrective actions when necessary.
2. The need for Member States to increase controls on the market and at EU borders and to adapt their investigative techniques to better detect fraud.
3. The importance of reinforcing import requirements and ensuring that honey exporting countries from outside of the EU are listed on EU's TRACES-NT database, a digital certification and management platform for importation of goods into the EU. This will help to *"facilitate the traceability of imported consignments and the targeting of reinforced checks by the EU Member States on those establishments which are suspected of trading adulterated products."*²³

The list of findings from both the first and the second Honey CAPs were extensive. The most notable differences between the two sets of findings were that in 2016, the JRC called for further action by both the Commission and organisations such as the International Honey Commission and the European Committee for Standardisation²⁴ to ensure that adulterated honey products would be prevented from making their way into the EU's internal market, while the *From the Hives* conclusions emphasised how tackling food fraud comes down primarily to the individual Member States, as outlined under the Official Control Regulation.²⁵

It should be noted that the major limitation that Member States face relates to the use of 'out-of-date' analytical techniques to detect small amounts of sugar syrups within imported honey, and so individual Member States can struggle to maintain control practices in laboratories without efficient analytical equipment.²⁶

Ultimately, until analytical methods are improved, funded, and standardised across the EU, it will be difficult to ensure that large quantities of fraudulent honey do not enter the internal market. A major development following *From the Hives* came from the Commission's proposal to amend the Honey Directive to ensure that all honeys are labelled not only with *"blend of EU honeys"*, *"blend of non-EU honeys"*, or *"blend of EU and non-EU honeys"* as is currently the case, but that all imported honey would be labelled with its exact country of origin, which could then be traced and analysed for adulteration by appropriate authorities.

Steps in the Right Direction: What are the legislative updates from 2024?

The most notable step forward in this process has come from the updates to the EU's 'Breakfast Directives' at the end of April 2024 improving the labelling of honey being sold in Member States. From the recommendations section of both CAPs and the most recent updates to the 'Breakfast Directives' and Honey Directive it appears that the Commission is willing to play a large role to attempt to ensure that fraudulent honey is prevented from entering the EU internal market to the highest degree possible. The European Parliament and the Council of Ministers have also already played their role in helping to reduce the amount of adulterated honey circulating in the EU market with the mentioned adoption of amendments to the 'Breakfast Directives'. Following the Commission's proposal to update current standards that are

23 Directorate-General for Health and Food Safety, 2022

24 Aries et al., 2016

25 Regulation (EU) 2017/625 (2017)

26 Directorate-General for Health and Food Safety, 2022

more than 20 years old, on 21 April 2024,²⁷ the Parliament approved updated rules on the composition, name, labelling, and presentation of certain ‘Breakfast’ foodstuffs, including rules for honey, fruit juices, jams, and milk.²⁸ The Council adopted the revised ‘Breakfast Directives’ to strengthen marketing standards and improve consumer information on 29 April 2024, meaning that Member States will be required to apply the rules within the next two years.

Updates to the Honey Directive (2001)³⁰

As of 13 June 2024, honey within the EU market must adhere to the quality and labelling rules outlined in the updated ‘Breakfast Directives’ that define the standards and composition criteria of honey. The revision of the Honey Directive incorporates the mandatory origin labelling for honey. It enables the Commission to “introduce harmonised methods of analysis to detect honey adulteration with sugar” in collaboration with the JRC, to regulate composition criteria of honey, prohibiting the removal of pollen from honey, the overheating of honey, and means that the Commission can put in place traceability methods to ensure that geographical origin information is being passed on correctly from the beekeeper all the way through to the consumer.



The labelling [of honey] will indicate the countries of origin in descending order, based on weight, including the percentage each country represents. Member states may decide that, for honey placed on the market in their territory, it is allowed to only indicate the percentage of the four largest shares, if these countries represent more than 50% of the blend.

Press Release²⁹

Creation of the EU Honey Platform Expert Group^{30 31}

In addition to the revised rules on honey, the updates to the Honey Directive established an expert group called the *EU Honey Platform* made up of the following:

- representatives of the EU countries, competent authorities and designated laboratories;
- experts representing relevant stakeholders in the honey supply chain;
- experts representing civil society;
- experts appointed in a personal capacity who have proven knowledge and experience in the areas covered by the Honey Directive ; and
- experts representing academia, including universities, research institutes and other scientific organisations.

The mission of the Honey Platform is “to provide the Commission with advice, expertise, data and information regarding honey quality, authenticity and traceability” as per the Register of Commission expert groups and other similar entities.

27 Katsarova, 2023

28 European Parliament, 2024

29 Council of the EU Press Office, 2024

30 Directorate-General for Agriculture and Rural Development, 2024

31 European Commission, 2024

Collaboration and Cooperation: How does Ireland fare?

Both the EU Commission’s Directorate-General for Health and Food Safety and the Directorate-General for Agriculture and Rural Development hold particular responsibilities when it comes to the prevention of adulterated food products from entering the EU’s internal market. At the international level, it is beneficial when the interests of multiple actors and agencies can come together to combat shared problems. In many ways, this is the essence of what EU cooperation sets out to achieve. In terms of Ireland’s role as an EU Member State, effectively safeguarding the interests of honey producers, consumers, and the actual honey makers (i.e. bees) requires cooperation and collaboration between a wide range of actors and agencies from across the public and private sectors.

The detection of adulterated honey on a standardised and widescale basis across the EU stands to benefit the more than 4,000 beekeepers in Ireland.³² The importation of adulterated honey into Ireland, if it goes untraced and is sold at cheaper prices, and which can have a longer shelf life than many indigenously produced equivalents, clearly presents a challenge for Irish honey producers. In addition to this, the consumption of honey adulterated with sugar syrups can increase the chances of obesity, heart disease, and types 2 diabetes.³³ Therefore, the effective detection and prevention of honey fraud of this kind can be beneficial to public health.

In Ireland, on a national level, the Food Safety Authority of Ireland (FSAI) is working to ensure that correct information is gathered and that all actors within the supply chain comply with terms of the EU Honey Directive. The main role of the FSAI is to ensure the correct labelling of honey products and to oversee regular inspections and sampling of the honey products that are on the Irish market, and, in turn, to ensure that this information is shared with cross border authorities such as OLAF and the FFN.³⁴ In addition to this, Teagasc, the Irish Agriculture and Food Development Authority, and the Department of Agriculture, Food and the Marine (DAFM) work to ensure that regulations on beekeeping and honey production are adhered to while also collecting data on imports and exports of Irish honey. According to 2019 data, DAFM estimated that the value of honey produced in Ireland was just under €4.3 million per annum, based on the production of 205 tonnes of produce.³⁵ In comparison, large amounts of honey are imported into Ireland to meet domestic demand. In 2023, this amounted to approximately 8,500 tonnes³⁶ of honey being imported from many of the largest EU and non-EU exporters of honey including Argentina, Belgium, Chile, China, Hungary, Mexico, Spain and Ukraine*.^{37 38}

Perspectives from Honey Stakeholders

In order to gain a deeper understanding of the honey supply chain in Ireland, including the risks posed by fraudulent practices, interviews took place in July 2024 with an Irish honey producer, a member of the FFN, and a leading academic on food labelling. Three key themes emerged from these interviews, namely: price remains a consumer priority, the importance of consumer knowledge, and the continued perseverance of fraud.

Honey Price as a Consumer Priority

Both the Irish honey producer and the academic interviewed noted that, although the introduction of more accurate origin labelling on honey was a good step to prevent fraud, overall, the price of honey for consumers remains the top priority when it comes to consumer behaviour. The representative from the FFN did not mention price sensitivity, but placed emphasis on the role of food business operators in maintaining high standards of quality and reputation in the EU honey market.

While discussing the Honey Directive and who is responsible for compliance with such directives, the Member of the FFN stated that: *“What is important is the role of food business operators themselves. Their core responsibility*

32 (According to 2019 data) FIBKA & IBA, 2019

33 Kashyap, 2017

34 Food Safety Authority of Ireland, 2024

35 Teagasc, 2020

36 IndexBox, n.d.

37 Eurostat, 2019

38 *details of exact origin location of honey imports into Ireland not available at time of research

is to ensure that the products they place on the market are safe and authentic [...] they perfectly know who behaves correctly and who doesn't. So, they have the responsibility to clean up a bit of the market themselves, and to remove the black sheep, as you might say."

In relation to consumers' choices, the Irish Honey Producer remarked: *"On the consumer's side, how are they to know what blend they are getting? The differentiator becomes the prices, which is not very helpful to consumers, packers, producers [or] beekeepers."*

When asked about the amendments to the 'Breakfast Directives' and the impacts it might have on consumer choices, the food labelling academic responded: *"I don't think it will radically change the competitiveness of the market, as most people are interested primarily in lower prices. But it may focus some consumers, and it may lead to some product reformulation. Will the 'Breakfast Directives' make a difference? I think yes, but I don't think they'll be as significant as they look on paper. Again, the highest determinant for most people will still be cost, not necessarily what's on the label."*

Consumer Knowledge

All three interviewees agreed that improving consumer knowledge had played a key role in updating the 'Breakfast Directives' and Honey Directive. Overall, mislabelling of honey was condemned and the experts in this area acknowledged that by changing labelling rules, the EU institutions were taking a leading role in tackling honey fraud, and food fraud more broadly. However, from the producer's perspective, the interlocutor noted that the practicality of changing labels for each batch of honey that is composed of slightly different blends may be problematic and can pose a significant financial burden for producers and packers.

At this stage of the interview, discussing the changes to labelling, the Honey Producer noted that *"labelling will contribute to better understanding for the consumers. Within the legislation, there has to be some flexibility however. Blending is very carefully done to achieve a certain standard, but honey remains a natural product subject to the vagaries of the weather and other forces and the blend has to be adjusted to take account of this. Having to change labelling each time would be difficult and expensive. Honey crops can fail or change, which means that the honeys used for a particular blend will have to change. Clarity increases for consumers but so does the price if the cost of labelling goes up for producers and packers. A balance is needed between the original intention behind the Directive and the practical issues for producers and packers around its implementation."*

When asked about how authorities can tackle fraudulent practices, the member of the FFN remarked on the need for integrity within the supply chain: *"It's a question of misleading consumers to be frank with you. If you want to put honey in a jar and you put a honey label on it, it should be honey, if it is honey for industrial purposes, for example for bakeries, this honey is mixed with other sugars and syrups purposefully, but let's not label it 'honey' and defraud consumers."*



Ultimately, honey blends will still be cheaper, but a modest change in consumer preferences should be deemed successful. Even if 3-4% of people change their buying habits, I think this is sufficient to make the updates [to the Honey Directive and 'Breakfast Directives'] worthwhile."

- Food Labelling Academic



It's the responsibility of the member states and food business operators to take this (new labelling rules) up, so we will see."

- Member of the FFN

The Food Labelling Academic sounded positive when discussing the changes to labelling: *"This is potentially a seismic directive where, on paper, the EU institutions have made a significant interjection into labelling criteria, which is a positive. I think Member States should be in favour of this because in the long term it will help their own domestic sectors."*

Fraud Perseverance

The third theme that arose consistently across these interviews was the view that no matter what rules are in place there will always be some sort of fraud which might not be detectable. Indeed, the Irish honey producer called for more supportive systems in Ireland to ensure compliance with food regulations, while the member of the FFN highlighted that Member States are not always well equipped to tackle fraud with their current capacities. The expert researcher in food labelling and regulation emphasised that getting rid of “*lawful deception*” should be a top priority for all those involved with food fraud.

In conversation about their hopes for the future of honey production, the Irish Honey Producer reflected on the system in place, saying: *“It reminds me a bit of the doping scandals in sport! Once the authorities find one substance there will be another one created that they don’t yet know about. It would be naïve to think there will never be fraudulent activity when it comes to any processes that make money. There is always someone who will seek to evade the rules because there are gains to be made, so it needs to be monitored. [...] When it comes to the Irish government. Over the years, there has been a more policing type of emphasis from the FSAI and food inspectors at a more local level. It is not the same in several other countries, where there is a more consultative process with the authorities to better understand and implement the regulations. A more supportive system could be useful. It might help overall with compliance if more consultative processes were in place.”*

When the Member of the FFN was asked about increasing accountability when it comes to food fraud, they said: *“[...] you have a few operators that do not behave correctly and that impacts negatively on the whole image of the sector. The difficulty is that member states operate their own official control activity, and they were/are not well equipped, to fight, or to detect fraud, so, it’s an easy game for fraudsters and people takes advantage of that. If you do not have the capacity to control, then it creates a loop.”*



Our mission is to celebrate natural differences in honeys and bring a range of these natural tastes to the consumer – not all honeys are the same and they shouldn’t be. It’s not a case of Irish honey or none at all, it is more a case of honey as it should be, true to what nature and the bees made it to be.”

– Irish Honey Producer

The Food Labelling Academic was asked about the role of legislation implemented from the top down, to which they replied: *“Sometimes legislation facilitates fraud. In my opinion, there should never have been an option to label honey as EU/Non-EU blends. Interventions like this could have happened earlier, they were being called for 20 years ago [...] I think the EU’s top priority to combat food fraud has to be reducing lawful deception. The EU lets ingredients into food products that are detrimental to human health and replace natural ingredients, which consumers are not always aware of.”*

Conclusion

Uncertainty still lies ahead for food fraud in the EU. Time will tell if the incoming College of Commissioners under President Ursula von der Leyen will make food fraud a priority in its work programme, and whether honey fraud will be high on the political agenda or not. Clearly, the outgoing Commission did place an important emphasis on food fraud and carried out the actions and amendments to legislation set out under the previous Honey CAPs, including with the most recent updates to the ‘Breakfast Directives’ and the revision of the Honey Directive. The Commission is also still working to engage with exporting countries outside of the EU *“to conduct investigations and to sanction confirmed frauds appropriately.”*³⁹

The CAPs on honey have outlined the need for restrictions not only on honey produce but other food items, which the ‘Breakfast Directives’ have highlighted. As it has been outlined in this paper, the discourse around honey within the EU is multifaceted and has received attention from the EU institutions and Member States. To return to the research question, which considers how effective current EU regulations and international cooperation efforts are in detecting and preventing honey adulteration, and what technological and legislative improvements can be made to protect consumers and support EU honey producers, it is clear that while the current EU regulations and cooperation between countries in the EU are working to detect honey adulteration, it remains to be seen whether this is enough to prevent fraudulent practices. By gathering perspectives from a representative from the FFN, an Irish Honey Producer, and a leading academic, we were able to identify three clear cross-cutting themes relating to the price of honey as a

consumer priority, the importance of consumer knowledge, and the ability for fraud to persist if effective monitoring does not take place across Member States. Still, all three interviewees agreed that the issue of adulterated honey within the EU is being addressed and that the updates to the Honey Directive and the 'Breakfast Directives' are a step in the right direction.

The incorporation of new technologies and improvements to legislation as discussed here will help Member States to tackle fraudulent honey from entering the EU's internal market. Collaboration between the EU Institutions, Member States, and from across the honey supply chain is essential, not only to prevent honey fraud, but to decrease consumer deception and to protect genuine producers in the long-term. In addition to this, putting in place measures to eliminate food fraud on a broader scale will help to maintain the integrity of the European single market itself.

Recommendations

The following measures could be taken by policy makers across the local, national, and international levels with a view to mitigating fraudulent practices taken by actors within the EU food market:

1. At the local level, it is important that consumers know what they are buying and are aware of the changes to labelling rules. Thus, it can be recommended that producers or local government bodies could release a campaign informing the public about the changes and what they mean. This might encourage consumers to check the back of honey jars in supermarkets and make informed decisions.
2. Nationally, and as set out by the Official Control Regulation mentioned previously, it is up to the individual Member States to make efforts to tackle fraudulent products coming across EU borders. It will be increasingly important for Ireland to work with EU and non-EU honey exporting countries, while ensuring that Ireland continues regular testing of honey and that suspected cases of fraud are reported to cross border authorities such as OLAF and the FFN. This reporting can take place as long as there is cooperation with Irish authorities such as DAFM, Teagasc, and the FSAI. Additional funding will also be needed to carry out random checks on honey consignments coming into the country.
3. Internationally, and at EU level, it is clear from the results of the JRC 2023 Report that analytical techniques and methods to detect fraud need to be improved and must be deployed consistently across the EU internal market. Therefore, funding for Member States to keep up with technological advances to combat food fraud is imperative for the successful detection of adulterated honey products. It should also be noted that although the onus is on Member States to make efforts to prevent fraudulent products from entering their domestic market, the EU institutions should continue to lead by example in ensuring that the Honey Directive is being complied with, as seen with the recent updates to the 'Breakfast Directives' and to the Honey Directive, which will need to come into effect in all Member States within two years.

Appendix A

Semi-structured interviews took place in July 2024. The interviewees have been anonymised under the following titles:

Interviewee 1: Irish Honey Producer

Interviewee 2: Member of the EU's Food Fraud Network

Interviewee 3: Leading Academic on Food Labelling

For further details of how these interviews were conducted, please email reception@iiea.com

References:⁴⁰

Aries, E. et al. (2016) *Scientific support to the implementation of a Coordinated Control Plan with a view to establishing the prevalence of fraudulent practices in the marketing of honey*. N° SANTE/2015/E3/JRC/SI2.706828. JRC Technical Report JRC104749.

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