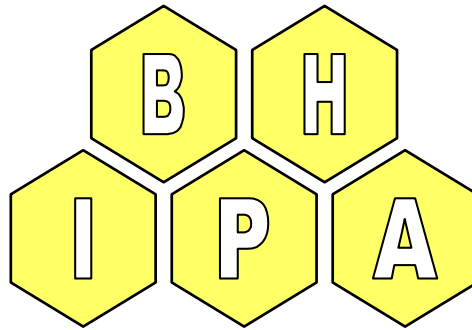


*British Honey Importers
& Packers Association*

'The Honey Association'



CODE OF PRACTICE

for

The Importation, Blending,
Packaging and Marketing of Honey

(prepared in consultation with LGR)

Information may be obtained about the Honey Association from

www.honeyassociation.com

HA CODE OF PRACTICE FOR THE IMPORTATION, BLENDING, PACKAGING AND MARKETING OF HONEY

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1. Introduction

- 1.1 The Honey Association comprises of Members who are responsible for the importation and packaging of approximately 90% of the honey marketed in the United Kingdom. Although in recent years overall consumption of honey has risen markedly only 10% of demand can be met by home production.
- 1.2 The Association is concerned to guard the reputation of honey as a pure wholesome food and totally deplores any attempt to adulterate the product or make false claims about its geographical or floral origin. To this end The Honey Association, in consultation with Local Government Regulation (LGR), and with the acknowledgment of the Food Standards Agency and DEFRA has produced a Code of Practice designed to supplement the statutory requirements and detail the high standards to which the Members of the Association accede.

2. Legal Requirements, Description and Labelling of Honey

- 2.1 Members of The Honey Association undertake, when importing, packing, selling or supplying honey to comply with the specific requirements of the Honey (England) Regulations 2003 (SI 2003 No 2243) and with separate regulations carrying the same provisions made for Scotland, Wales and Northern Ireland. Additionally, compliance is required with The General Food Regulations 2004(SI 2004 No 3279) including traceability

requirements, with the general requirements of the Food Safety Act 1990 and The Consumer Protection from Unfair Trading Regulations 2008 (SI 2008 No1277) and any subsequent amendments to these Regulations. Particular attention is drawn to the requirements for labelling descriptors, advertising and the requirements relating to the nature substance and quality to which honey must adhere.

It is stressed that "honey" is the unadulterated product produced by honey bees from the nectar of blossoms or from the natural sweet substances exuded by plants. It consists predominantly of fructose and glucose. Colour may vary from nearly colourless to dark brown and consistency can be fluid, viscous or partly/entirely crystallised. Flavour and aroma will vary, deriving mainly from the blossom origin.

2.2 The Honey Regulations 2003 also cover the physical and chemical composition of honey offered for retail sale, laying down maxima or minima in the following areas:

Moisture Content (Fructose + Glucose Content)	Acidity
Sucrose Content	HMF Content
Electrical conductivity	Diastase activity
	Water insoluble matter

Honey shall not have begun to ferment or effervesce.

2.3 The following definitions are contained in The Honey Regulations 2003:

- (a) The description "honey" without further qualification can be used only for pure honey. This description may be used on the label to describe (or be used in place of) the specified honey products blossom honey, nectar honey, honeydew honey, drained honey, extracted honey and pressed honey.
- (b) The description "blossom honey" can be used but only if the honey is wholly or mainly derived from the blossom or plant specified
- (c) Honey which does not meet the regulations in terms of moisture, HMF or diastase activity may be sold only as 'industrial' or 'bakers' honey.
- (d) The descriptions "comb honey", "chunk honey" and "filtered honey" can only be used if the honey meets the relevant specification contained in schedule 2.

2.4 Labelling

The label must include:

- (a) The name of the food
- (b) The appropriate durability declaration
- (c) The net weight
- (d) The name or business name and an address or registered office of either or both of
 - (i) The manufacturer or packer or
 - (ii) A seller established within the European Community
- (e) The country or countries of origin where the honey has been harvested save that if the honey originates in more than one Member State or third country the countries of origin may be replaced with one of the following specific phrases as appropriate.

(i) Blend of EU honeys (ii) blend of non-EU honeys (ii) blend of EU and non-EU honeys
NOTE A label may only refer to geographical origin if the honey originates entirely from the place indicated.

- (f) Whenever honey is to be sold by specific floral or geographical description then Members must take all reasonable steps and exercise all due diligence to satisfy themselves that the product wholly complies with the chosen description. They must also take reasonable steps to ensure that the source material is pure honey, is not falsely described and otherwise complies with the requirements of the law.
- (g) In accordance with the honey association voluntary code of practice on infant botulism, the label should contain the following statement:

“Unsuitable for children under 12 months”

- (f) The label must be clearly legible and indelible and the name, durability and net quantity must be in the same field of vision

3. Imports

3.1 Imported honey accounts for approximately 90% of the United Kingdom market. Importers will take all reasonable steps and exercise all due diligence to ensure the imported product is not adulterated or falsely described and otherwise complies with the requirements of the Legislation and Contracted Conditions. Importers must carry out the following steps.

- (a) Sampling from new suppliers.
- (b) Sampling from bulk deliveries from existing suppliers for due diligence purposes. The above sampling will be in accordance with the recognised procedure, and based on a risk assessment of the honey supplier, taking into account whether the honey source is a Member State or a third country. Samples should be examined for taste, analysed or tested for moisture, purity and fair average quality (FAQ) of the type of honey described, and otherwise for any other purpose on an as needs basis. Records of all samples and the results should be kept for reference for at least the full life of the product taking into account the shelf life given to the retail pack.

Tests will be carried out to ensure the product is free of unauthorised veterinary drugs and pesticides and authorised veterinary drugs above the relevant Maximum Residue Limit.

3.2 Importers must ensure that all honey containers are clean, sound and totally suitable for containing foodstuff. All containers must carry adequate and indelible visible identification.

4. Quality Control and Assurance

4.1 The purpose of this part of the Code is to ensure that minimum standards are prescribed to which Members would subscribe and also to form the basis of a system of reasonable precautions and due diligence. To those ends Members must ensure that staff at all levels are made fully aware of all the requirements of the Code and that they implement the provisions of the Code relating to the basic control procedures set out below.

4.2

Tests will be carried out to ensure the product is free of unauthorised veterinary drugs and pesticides and authorised veterinary drugs above the relevant Maximum Residue Limit.

4.3 Packers must carry out the following steps:

(a) Sampling from bulk deliveries:

Samples shall be taken according to a recognised procedure. The sampling frequency will be based on a risk assessment of the honey supplier which will also take into account the origin of the honey. Samples should be examined for taste, analysed or tested for moisture and fair average quality for the type of honey described, and otherwise for any other purpose on an as needs basis. Records of all samples and the results should be kept for reference for at least the full life of the product taking account of the shelf life given to the retail pack.

(b) Maintaining stock records:

Packers must keep these records of receipts, volumes processed and final out-turns in a way which is sufficiently detailed as to identify both volumes and origins of different honey at all stages of production.

Packers must make these records and any other relevant documentation readily available to any enforcement authority upon request

(c) Product Identification and Labelling:

Packers must ensure that at all times containers (bulk, process or retail) contain adequate and indelible visible identification of origin.

All production should be identified and marked at the time of production and kept clearly separate and identifiable until labelled ready for despatch

(d) Production of new batches and hygiene:

Packers must take particular and special care to avoid honey residues in containers, filters and pipelines in order to avoid the risk of mixing with new batches of different origin honey.

Good manufacturing practice should be applied with specific emphasis on:

Purging the lines.

Discharging the initial portion of the new batches to ensure absence of any previous batch.

Ensuring holding tanks are empty.

Packers will comply with the Food Hygiene Regulations and The Honey Association Code of Practice on Bio-Security.

(e) Hazard Analysis Critical Control Point System (HACCP)

All honey packers who are Members of the Association shall have in place a full HACCP system covering their complete production procedure to ensure reasonable due diligence.

5. Complaints

- 5.1 Members, and when appropriate (see (d) below), the Association will take steps to investigate and speedily resolve any retail or consumer complaints about the quality of honey. The complaints procedure the Honey Association would expect its members to follow, is given below:
- (a) The Honey Association would expect its members, on receipt of the complaint, to acknowledge it, note the date of receipt and full details of the matter complained of.
 - (b) The complaint will be investigated by a person nominated by the Member who will investigate complaints immediately and report his findings to the complainant as soon as practicable, with proposals to resolve the matter in the event of the complaint being justified in which case Honey Association would expect its members to compensate the complainant adequately.
 - (c) Where the complaint concerns an "own label" or "private label" product, the Honey Association would expect
Any Member concerned to offer the distributor/retailer practical assistance, so that the distributor/retailer can respond to and resolve the complaint quickly. Where the complaint relates to a brand this would normally be dealt with by the manufacturer direct.
 - (d) All Honey Association Members should report to the Association any complaint of a serious nature.
 - (e) This procedure in no way prejudices a complainant's right under the law nor does it preclude him from pursuing the complaint elsewhere.
 - (f) Members and the Association (in the case of (d) above) will keep a record of each complaint and the procedures taken with the dates and details identifying relevant persons.

6. Monitoring and General

- 6.1 It is a condition of membership of the Honey Association (British Honey Importers and Packers Association) that members must under no circumstances adulterate or knowingly falsely describe the product, taking into account the steps taken in Section 4.
- 6.2 The Association is empowered to monitor Members' adherence to the Code of Practice and ensure that new Members fully understand the requirements and implications of the Code. Alleged breach of any provision will be raised with the Member concerned and serious allegations concerning possible adulteration or false description may be referred to the "Home Authority". The requirements of the Code will be reviewed from time to time by the Association or at the request of LGR representing the interests of the enforcement authorities.