

Mr. Janusz Czesław Wojciechowski
Commissioner for Agriculture
European Commission
B-1049 Brussels – Belgium

13/02/2023

Dear commissioner,

The undersigned would like to express their utmost support to the non- paper presented by 20 Member States on the revision of the Honey Directive during the Council of Ministers of the 30th of January.

A deep reform of that directive is more than necessary in order to improve consumer information, tackle fraud and adulteration, and to limit the distortions of competition the European beekeepers have been suffering for many years.

The current rules on labelling mislead consumers, who are increasingly attentive to the origin of the food products they buy. Moreover, honey is particularly sensitive to fraud, which leads to a loss of consumer confidence in a product deemed healthy and natural.

Honey imported from third countries is often used in blends due to its low price. The labelling rules should provide the obligation to indicate each country of origin, in descending order, and its respective share of honey, in order to help consumers make better purchasing decisions and improve the added value of European products in the market. The names of the countries should also be spelled out in a way that is understandable to everyone and should be clearly legible on the jar. Furthermore, this should be accompanied by promotional actions to highlight the quality and diversity of European honeys.

We would also very much appreciate if you would take the opportunity of the revision of the Directive to address other complementary issues such as updating the list of analysis methods to check the conformity of honey, since the current list is obsolete in front of more and more sophisticated techniques of fraudsters. It is also essential to improve the traceability from the beekeeper to the consumer with a minimum of mandatory and harmonized rules with the introduction of identification codes for all products either imported or produced in the EU.

It is also crucial to defend the definition of honey, as it is written in the current Directive, at the International Organization for Standardization (ISO), where China is currently trying to impose a definition that would allow it to export low-cost products under the name of "honey", to the detriment of quality and consumer confidence in EU products.

Other misleading practices should also be addressed in the revision of the directive, such as "ultra-filtered" honeys, which are practically devoid of pollen, heat treatments above 40 or 50 degrees, as well as Chinese honeys ripened by artificial evaporation that deplete the natural flavours of the product.

We thank you very much for your attention.

Yours sincerely,

- 1.-TOLLERET Irène
- 2.-CARVALHAIS Isabel
- 3.-DE CASTRO Paolo
- 4.-LUTGEN Benoît
- 5.-GOERENS Charles
- 6.-ZOIDO ÁLVAREZ Juan Ignacio
- 7.-ALFONSI François
- 8.-MAZYLIS Liudas
- 9.-OLEKAS Juozas
- 10.-MAUREL Emmanuel
- 11.-SCHNEIDER Christine
- 12.-KEFALOGIANNIS Manolis
- 13.-DONATH Anna
- 14.-CIOLOS Dacian
- 15.-AVRAM Carmen-Gabriela
- 16.-GUILLAUME Sylvie
- 17.-ARIMONT Pascal
- 18.-WAITZ Thomas
- 19.-ANDRIEU Eric
- 20.-BOGOVIC Franc
- 21.-NEMEC Matjaz
- 22.-ALIEVA-VELI Atidzhe
- 23.-BRGLEZ Milan
- 24.-MOTREANU Dan-Stefan
- 25.-BORZAN Biljana
- 26.-TOMC Romana
- 27.-PICULA Tonino
- 28.-MELCHIOR Karen
- 29.-SANDER Anne

- 30.-MITUTA Alin
- 31.-HOJSIK Martin
- 32.-ŠIMEČKA Michal
- 33.-WIEZIK Michal
- 34.-VEDRENNE Marie-Pierre
- 35.-SOKOL Tomislav
- 36.-AMARO Álvaro
- 37.-JOVEVA Irena
- 38.-LAURETI Camilla
- 39.-KELLER Fabienne
- 40.-MATO Gabriel
- 41.-ARA-KOVACS Attila
- 42.-KEFALOGIANNIS Manolis
- 43.-GRUDLER Christophe
- 44.-ROTH NEVEDALOVA Katarina
- 45.-RODRÍGUEZ PALOP Eugenia