

Code of Practice

Honig-Verband e.V. / German Honey Association

1. Foreword

The Honig-Verband e.V. (German Honey Association) represents the interests of honey packers and importers in German-speaking countries. Its members are primarily companies from Germany, but also from the neighbouring countries, Austria and Switzerland. Together with its members, the German Honey Association has been campaigning for the purity and authenticity of honey for over 70 years. Honey is a valuable natural product and is one of the most traditional foods in our diet. The self-sufficiency rate for honey in Germany is only around 20% of the country's honey requirements. In the EU, the level of self-sufficiency is around 60 %. For these reasons, imported honey plays an important role on the German and European market.

2. Objective

To the great concern of our sector, there are repeated attempts to adulterate honey by among other things, adding foreign sugars. The development of additives for honey adulteration is unfortunately very dynamic. It is constantly being changed and professionalised. For this reason, the German Honey Association and its members firmly distance themselves from market participants who use unfair practices. The German Honey Association has therefore drawn up its Code of Practice, which serves to create a clear framework for companies involved in the honey trade, including recommendations for preventing the spread of honey adulteration in order to increase product safety. This Code of Practice is intended to provide information and clearly advocate defined minimum standards.

3. Legal basis (import and packing)

The legal basis for honey is the EU Honey Directive ([2001/110/EC](#) as well as the Amending Directive [2024/1438/EU](#) which entered into force on 14th of June 2024) and the Codex Alimentarius for honey. According to these legal bases, honey is exclusively a product of the honey bee *Apis Mellifera*, without any additives.

The following additional legal requirements must be observed when importing honey into the European Union:

- The supplier country must fulfil the quality criteria for the import of honey into the EU/Switzerland and be approved in accordance with [2021/405/EU](#) (Implementing Regulation to Regulation [2017/625/EU](#) laying down the lists of third countries or third territories from which the entry of certain goods into the Union is authorised).
- The establishment of a third country supplier must be listed in the official establishment list of its country from 29th of November 2024 in accordance with [2023/2652/EU](#) (Delegated Regulation amending Delegated Regulation 2022/2292/EU as regards the requirements for entry into the Union of amongst others honey).
- The supplier must be registered and certified as an exporter in accordance with the provisions of the respective country of origin.
- The supplier must guarantee the traceability of the honey.

- The company must be able to present a HACCP plan (hazard analysis and definition of control points).
- [2017/625/EU](#) Official Control Regulation (OCR): Regulation on official controls and other official activities to ensure the application of food and feed law and rules on animal health and welfare, plant health and plant protection products.
- [2020/2235/EU](#) Implementing Regulation to Regulation 2017/625/EU as regards the models for entry into the Union of consignments of certain goods. According to Implementing Regulation [2024/399/EU](#), new model health certificates must be used from 3rd of September 2024.
- [1169/2011/EU](#) Food Information Regulation: Regulation concerning the provision of food information to consumers.
- [396/2005/EU](#) Regulation on maximum residue levels of pesticides in or on food and feed of plant and animal origin.
- [2023/915/EU](#) Regulation on maximum levels for certain contaminants in foodstuffs.

4. Recommendations of the German Honey Association on the behaviour of market participants

In addition to the legal requirements, the German Honey Association defines the following recommendations for market participants:

Companies - internal

- Comprehensive internal company specifications for honey should be available.
- Incoming goods are checked and analysed on a risk basis.
- Measures should be defined for dealing with non-compliant deliveries.

Risk analysis

- A risk analysis should be carried out to identify and monitor vulnerabilities in the supply chain.
- A risk analysis of the above-mentioned vulnerabilities should be prepared.
- A sufficient catalogue of measures to counter the vulnerabilities should be available.

Suppliers

- Importers/buyers should have a procedure for approving new suppliers and apply this.
- Existing suppliers are regularly evaluated or audited according to defined parameters.
- Suppliers must contractually confirm the company's internal specifications for honey.

Supply chain

- The supply chain is clear and transparent. In all cases, the origin of the goods must be contractually confirmed and verifiable.
- The traceability of the goods must be ensured by the market participants.

5. Analysis minimum standard of the German Honey Association

To ensure the consistently high quality of the honey and the safety of consumers, all imported honeys are analysed for their ingredients in renowned laboratories using various methods. The main focus here is on the requirements of the German Honey Regulation and therefore also the requirements of the European Honey Directive. The German Honey Association recommends the following minimum analysis standard for the detection of foreign sugars in honey:

H-NMR (Bruker or equivalent)

The H-NMR method is the only authenticity analysis that defines a fixed method description and a harmonised analysis procedure for uniform application. It detects the addition of foreign sugars.

IRMS (AOAC 988.12)

The only harmonised and standardised method for the analysis of honey authenticity reveals whether C4 foreign sugars have been added.

The company's internal risk assessment may require further / deviating analyses.

6. Compliance guideline of the German Honey Association

For many years, the German Honey Association has laid down its own compliance rules for the work of the association and its members in a guideline. These guidelines contain all the requirements under applicable law and are regularly reviewed by renowned law firms. In addition, the German Honey Association has drawn up a Due Diligence Code of Conduct, which relates in particular to human rights and environmental protection. This is accompanied by a supplier declaration in order to define the same requirements for the respective suppliers and to commit them accordingly.

Created by the German Honey Association, adopted by the members of the German Honey Association on 04 January 2024 in Hamburg, entered into force on 01 February 2024.