



Brdo pri Lukovici, 05. March 2026

**Subject: Response of the Scientific Committee of the European Beekeeping Association to Your Recent Communication on outstanding issues facing European beekeepers**

Dear Commissioner Hansen,

On behalf of the European Beekeeping Association (EBA), we thank you for your response to the concerns raised regarding the state of the EU honey market, import controls, and the enforcement framework under Union law. We appreciate the opportunity to engage constructively and would like to provide clarifications and further considerations on the points addressed.

**1. Compliance with the Honey Directive and Enforcement Gaps**

You reaffirm that all honey marketed in the EU must comply—without exception—with the quality and labelling requirements laid down in the Honey Directive and that non-compliance is subject to controls and sanctions by Member States' competent authorities.

This objective is fully shared by genuine producers and consumers. However, in practice, what is legally framed as a “must” has too often become the exception rather than the rule. The reasons are well known: systemic legislative gaps and weaknesses in the implementation of existing legislation, both at the border level and within the internal market. The Commission is aware of these shortcomings; what remains necessary is the political will to address them decisively. The EBA stands ready to detail the specific gaps that persist at each stage of the honey trade chain.

A central weakness lies in the structure of controls under Regulation (EU) 2017/625 (Official Controls Regulation – OCR). Border Control Posts (BCPs) frequently detect suspicious consignments but cannot refuse entry because the analytical methods currently used are not established as legally binding EU reference or officially validated control methods under the OCR. As a result, consignments are merely flagged as “suspicious,” and responsibility is shifted to the national competent authorities.

However, under Article 34 of the OCR, competent authorities must rely on legally prescribed reference methods or fully validated confirmatory methods that are admissible in court. In many Member States, such validated and legally defensible methods are not yet available. Consequently, authorities are often unable to reclassify suspected honey as adulterated, even



when there are strong indications. This enforcement gap is a major structural driver of honey fraud in the EU.

## 2. Imports, Market Balance, and the EU–Mercosur Agreement

Regarding imports under the EU-Mercosur Partnership Agreement, you indicate that additional market access may help meet EU demand while diversifying supply, with a safeguard mechanism in place in case of serious harm.

While it is correct that the EU is approximately 63% self-sufficient in honey production, this figure requires careful interpretation. According to Eurostat data for 2024, the EU produced approximately 282,000 tonnes, imported around 175,000 tonnes, consumed 435,000 tonnes, and exported 25,435 tonnes. The Union already imports substantial volumes, including honey that is subsequently re-exported. The issue is therefore not physical shortage but persistent price pressure caused by large quantities of low-priced imports—primarily from China, Ukraine, and Argentina—often entering at prices below €2/kg.

Additional duty-free volumes from Mercosur risk intensifying these distortions rather than addressing structural weaknesses. Regarding diversification, most monofloral varieties produced in Mercosur countries (e.g., clover, eucalyptus, rapeseed, sunflower) are already widely available within the Union. Furthermore, the prevalence of blended products in global trade continues to raise concerns about traceability and origin transparency. In some years, Argentina’s export volumes have exceeded its declared domestic production, which warrants closer scrutiny.

The bilateral safeguard clause embedded in the EU–Mercosur Agreement is, by design, reactive and temporary. It requires a formal demonstration of serious harm and is typically activated only after damage has already materialised. For a sector under prolonged structural strain, reliance on ex post corrective measures does not provide sufficient reassurance.

Additionally, the distinction between food fraud enforcement and trade defence instruments remains significant. Very low-priced imports have thus far been treated primarily as fraud issues rather than as potential dumping cases under EU trade defence rules. This legal framing has substantial implications for adequate market protection.

The findings of the 2023 “Report from the Hive” are particularly concerning: in 2021–2022, 63% of honey exported from Brazil and 54% from Argentina to the EU was found non-compliant with EU legislative requirements. In this context, further tariff liberalisation without prior strengthening of enforcement mechanisms risks exacerbating existing imbalances.

The central question is therefore not one of numerical self-sufficiency, but whether additional duty-free imports introduced into an already price-distorted and enforcement-challenged market may further weaken a strategically crucial agricultural sector. A precautionary, evidence-based approach appears warranted.



### 3. The HarmHoney Project and Validation of Analytical Methods

We acknowledge the progress of the HarmHoney project, led by the Joint Research Centre (JRC), which aims to harmonise analytical methods for detecting honey adulteration. High-quality scientific work indeed requires time. Nevertheless, several structural and legal concerns merit attention.

First, for enforcement to be effective, analytical methods must be fully validated, accredited, and legally defensible. The interlaboratory validation phase, under ISO 5725 standards, is critical. Large-scale EU-wide validation typically requires participation of 15–30 laboratories (with a minimum of eight), and for robust reproducibility, ideally more than 30. Fewer participants significantly weaken statistical reliability at the 95% probability level.

The JRC has indicated collaboration with National Reference Laboratories (NRLs) and Germany's National Reference Centre for Authenticity. However, official NRLs for honey have not been formally established because the delegated act foreseen under Article 100 of Regulation (EU) 2017/625 has not been adopted. Without a fully operational NRL network, large-scale validation in line with ISO 5725 requirements is structurally constrained and unlikely to be completed within a short timeframe.

Second, even after interlaboratory validation, a further phase is required: standardization and legal integration. Methods must be adopted by CEN and/or ISO and integrated into EU official control legislation. Laboratories must be trained, and the methods incorporated into TRACES, import controls, and enforcement workflows. Given the biological variability of honey and the adaptive capacity of fraudsters, this phase realistically requires at least two to three years.

Third, while the JRC may legally develop and validate analytical methods, it cannot confer legally binding status on them unless formally designated as a European Union Reference Laboratory (EURL) under the OCR. Publication or technical validation alone does not make a method legally binding for official control purposes. Only methods laid down in Union legislation by the Commission through implementing acts acquire that status.

Under the OCR, the only officially prescribed and legally binding reference methods are those established by Union law. This legal distinction is fundamental for enforcement credibility.

### 4. Risk-Based Controls at Border Level

We note that the organisation of controls at Border Control Posts is currently determined primarily by public and animal health considerations.

However, Article 47(1)(b) of Regulation (EU) 2017/625 empowers the Commission to adopt implementing acts imposing reinforced controls where there is evidence of known or emerging



risks, including widespread serious non-compliance. Honey clearly falls within this category, given the documented scale of fraud.

In light of 2023 coordinated control findings, honey may be classified as a product presenting a persistent high risk of non-compliance, thereby justifying systematic reinforced checks rather than sporadic or intelligence-led interventions.

The Commission could therefore strengthen border controls by mandating reinforced physical checks, establishing minimum sampling percentages, and requiring laboratory authenticity testing prior to release for free circulation. Such measures would significantly enhance preventive enforcement.

## 5. Establishment of an EURL and NRLs for Honey

You indicate that the Honey Platform has been invited to reflect on the scope and structure of a potential EURL or European Union Reference Centre for honey.

The legal framework governing the establishment, tasks, and scope of EURLs is already clearly defined in Articles 92–93, 97, and 98 of Regulation (EU) 2017/625, while Articles 100–101 provide for the establishment of National Reference Laboratories. These provisions have been in force since 2018.

Under the same legal framework, several EURLs—such as those for foodborne viruses, fish and crustacean diseases, and halogenated persistent organic pollutants—have been operational since 2018. The continued absence of an EURL and formally designated NRLs for honey constitutes a structural gap in the control architecture.

Transferring responsibility for reflection to the Honey Platform does not address this legal omission. The establishment of an EURL for honey and the adoption of the necessary delegated acts for NRLs are actions foreseen by existing legislation and should have been implemented years ago.

## Conclusion

The EBA Scientific Committee respectfully submits that the challenges facing the EU honey sector are primarily structural and legal, rather than conceptual. Clear legislative tools already exist within the framework of Regulation (EU) 2017/625 and related Union law. What is required is their full and timely implementation.

We remain at your disposal to provide further technical documentation and to contribute constructively to strengthening the integrity, transparency, and sustainability of the EU honey market.



European  
Beekeeping  
Association

Head office: Brdo pri Lukovici 8  
1225 Lukovica, SLOVENIJA  
eba@ebaeurope.eu  
<https://ebaeurope.eu/>

Respectfully,

President Boštjan Noc – President of European Beekeeping Association

A handwritten signature in blue ink, appearing to read 'Noc Boštjan', written in a cursive style.

Dr. Nik Lupše –Head of EBA Scientific Committees, on behalf of the Scientific Committee for Safety and Quality of Bee Products

A handwritten signature in black ink, appearing to read 'Lupše', written in a cursive style.

Contributing members of the Scientific Committee for Safety and Quality of Bee Products:

Dr. Juraj Majtan

Prof. Dr. Dražen Lušić

Prof. Dr. Andreas Thrasyvoulou

Dr. Roxana Spulber

Sent for information to:

- The Committee on Agriculture and Rural Development (AGRI)
- Members of the EU Parliament
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European  
Beekeeping  
Association

Head office: Brdo pri Lukovici 8  
1225 Lukovica, SLOVENIJA  
eba@ebaeurope.eu  
<https://ebaeurope.eu/>

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