

UK's results under the Commission's control plan on honey authenticity

Summary

1. The UK participated in an EU wide co-ordinated control plan on honey authenticity to establish the prevalence of fraudulent practices, in the marketing of honey throughout the EU. This was carried out in accordance with [EU Recommendation 2015/1558](#).
2. In the UK 147 formal honey samples were taken in accordance with the [Food Law Code of Practice](#) and submitted to Public Analysts (PAs) for testing in line with the EU protocol.
3. The preliminary findings of the EU survey can be found on the [European Commission's](#) website. This report summarises, the UK's findings as part of this survey.

Survey requirements and overall approach

4. In 2015, the EU Recommendation 2015/1558 required Member States to participate in a co-ordinated control plan with a view to establishing the prevalence of fraudulent practices in the marketing of honey. The Recommendation required Member States to have official control plans in place for sampling and testing for honey authenticity and mislabelling. The purpose was to check compliance with EU rules, looking specifically at the prevalence of adulteration with sugars or mislabelling with regard to botanical source or geographical origin or other particulars. It also aimed to improve the knowledge and strengthen the analytical capability to detect the presence of exogenous (or added) sugars or sugar products, in honey.

Sampling and Analysis

5. Samples were taken by local authorities in England, Wales and Northern Ireland and coordinated through regional trading standards groups as part of the [national coordinated sampling programme](#). Food Standards Scotland coordinated local authority sampling in Scotland. Sampling plans were issued as part of the sampling protocol in line with EU guidance and can be found in Appendix 1.
6. All samples were submitted to PAs who dealt with samples in line with usual procedures for official controls samples. Analysis was carried out in accordance with the Commission recommendation as detailed in the sampling protocol (appendix 1).
7. Samples were taken between 1 June and 15 July 2015 and reported back to the Food Standards Agency (FSA) by 31 October 2015.

Results

8. 147 samples were taken from various points along the food chain as indicated in the table below. 93% of the samples were found to be compliant.

	BIP	Producer	Importer or wholesaler	Packaging establishment	Distribution or retail	Total
Part A samples (UK origin)		10		5	15	30
Part B samples (Non UK)	9	3	6	27	21	66
Part C samples (blended)	9	15	7	8	12	51

9. 5% of these samples were classed as non-compliant. These non-compliances were mostly related to the incorrect botanical source (4%) and or for the presence of exogenous sugars or sugar products (1%).
10. In addition, and in accordance with the EU protocol, 2% of samples were classified as being in “suspicion of non-compliance” with regards to geographical region (1%) and possible presence of exogenous sugars or sugar products (1%).

Follow up work

11. The EU protocol required that suspect samples and a random selection of samples that were compliant were sent to the Joint Research Centre - Institute for Reference Materials and Measurements of the European Commission (JRC-IRMM). In the UK 22 samples were sent. The reason for submitting these samples to JRC-IRMM is to carry out further analysis and improve the knowledge base about honey on the EU market. Further work using advanced techniques is envisaged by the Commission to look at the detection of added sugars, including work to strengthen analytical capacity. Further information on this can be found in the [Questions & Answers](#) section of the EU Commission website as well as the [outline plan](#). The report summarising the follow up findings of this work is expected in mid-2016.

Appendix 1 – EU coordinate control plan with a view to establishing the prevalence of fraudulent practices in the marketing of certain foods.

SAMPLING PROTOCOL

1. Organisation of the study

- 1.1. The sampling relates to requirements under [EU Recommendation 2015/1558](#) for Member States to participate in a co-ordinated control plan with a view to establishing the prevalence of fraudulent practices in the marketing of certain foods and in particular honey. The Recommendation requires Member States to have official control plans in place which allow sampling and testing for honey authenticity intended to detect mislabelled honey with a view to improve knowledge base necessary to strengthen the analytical capability to detect the presence of exogenous sugars or sugar products in honey. The control plan also includes reporting to the EU of results of the samples analysed.
- 1.2. The samples will be formal samples taken in accordance with the Food Law Code of Practice¹ and by suitably qualified officers. Samples will be submitted to the local authority appointed Public Analyst (Enforcement Officers (Eos) should liaise closely with their Public Analyst on this study).
- 1.3. This sampling protocol and individual sampling plans set out the FSA requirements for participating EOs from Local Authorities (LAs) in the UK.
- 1.4. The individual Local Authorities (LAs) are spread throughout the UK, including LAs in Scotland, Wales and Northern Ireland. The numbers of samples allocated to each LA have been selected on the basis of achieving a representative geographical spread throughout the UK based on population figures in the different Government Office regions and UK Countries. The LAs selected are also UK Food Surveillance System users.

Samples must be collected between 1 June and 15th July 2015.

2. Samples

- 2.1. A total of 150 samples will be collected in the UK and the breakdown of samples in accordance with the Commission recommendation can be seen in the table below

¹ <http://www.food.gov.uk/enforcement/enforcework/foodlawcop/>

Separate codes are provided for Scotland, Wales and Northern Ireland Authorities

	England	Scotland	Wales	NI
UK Origin (20%)	25	2	2	1
Non UK (40%)	50	5	3	2
Blended (40%)	20	5	3	2
Total	125	12	8	5

2.2. Regional Groups taking part in the 2015-16 programmes have been allocated samples. Samples where possible should include non-branded, branded and own-label products including small local shops selling their own or locally produced honey.

2.3. EOs should, as far as possible, follow the sampling plans supplied by the FSA or discuss with the APA.

3. Businesses to target

3.1. Samples should be taken from various points of the production and supply as indicated by table below and a more detailed plan for England and Wales is provided in Annex B and C respectively.

		BIPs	Producers	Importer or wholesaler	Packaging establishments	Distribution or retail	Total
Part A (UK origin)*	E		8		7	12	25
	W		2				2
	S		2				2
	NI		1				1
Part B (Non UK)*	E	10	5	10	15	10	50
	W			1	2		3
	S			2	3		5
	NI			1	1		2

							60
Part C (blended)	E	8	11	10	11	10	50
	W		1	1	1		3
	S		1	1	3		5
	NI			1	1		2
							60

* Please note that Part A & B samples **should not be blended**.

3.2. Primary Authorities should be notified where a sample is taken from an outlet where there is a partnership in place. A detailed list of registered partnerships can be found on the BRDO website².

4. Collection of the sample

4.1. EOs should be aware of the Practice guidance (http://www.food.gov.uk/multimedia/pdfs/enforcement/food_law_practice_guidance) and in particular sections 6.1.6.4.

Note: if samples can't be found according to the LA sample plan then EOs should select samples, as close as possible to the above stated requirements, and notify the APA of any changes.

5. Recording Sample information

5.1. Please identify the Brand owner name, email address and contact details as well as claimed origin – especially where they differ from the business premises sampled. This information should be stored by completing the UKFSS 'brand name' field and placing contact email addresses, contact names and phone numbers under the 'additional information' field in the 'COP menu' - see below.

² <https://primaryauthority.lbpro.org.uk/eFpWorkplace/pa-public/pa-public-partnerships.php>

- 5.2. Sample data must be uploaded onto UKFSS and the following specific code used for this EU survey:

Survey ref: EUHONEY2015.

- 5.3. Cut and paste this code into your 'optional look up lists' and it will appear in the drop-down as shown below in the 'Reason for Sampling' menu screen.

Surveillance/Monitoring

Sample Type:

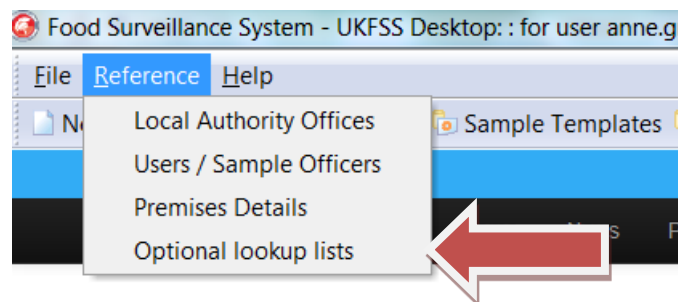
Sample was taken as part of a survey

Survey Body:

Survey Ref:

FSA/123/2014
FRAUDEU2014

- 5.4. The Optional look up lists can be found under the 'Reference menu'; just add to the 'Survey Reference' list.



Lookup lists

Brand name	Food description	Manufacturer	Distributor	Importer	Survey Reference	Ar
FSA/123/2014						
FRAUDEU2014						

- 5.5. If you are a version 9 user you will be expected to upload test certificates into UKFSS DESKTOP by adding attachments. Non-Version 9 users should send the certificates to the FSA standards.support@foodstandards.gsi.gov.uk mailbox – please put “EU Honey testing – certificates of analysis” in the subject header.
- 5.6. Any relevant label information you want to include can be added in the 'additional information' in the 'COP menu'.

5.7. Scanned photocopies or digital photos of the product's labelling should be taken and retained on local authority systems and can be uploaded onto UKFSS version 9.

6. Analysis

6.1. The analysis should be done in accordance with the Commission recommendation and this is attached in Annex C.

6.2. The EU protocol foresees that samples with compliant sugar profile in tier 2 should be submitted to LC-IRMS or EA-/LC-IRMS if the method is available in the Member State. When it is not available, the samples should be submitted to EA-IRMS and subsequently sent to Joint Research Centre (JRC).

7. Timescales

7.1. The Following timescales apply:

- Sampling has to be between the week beginning 1st June to 15th July 2015.
- All samples should be submitted to the Public Analyst Laboratories by 17th July 2015
- All sample analysis certificates should be uploaded onto UKFSS desktop by Local authorities as they become available or sent to the FSA (samplinggrants@foodstandards.gsi.gov.uk).
- FSA will report result to the EU by 31st October 2015.

8. Invoices

8.1. Local Authorities should request separate invoices from the laboratories specifying the following project code: FS101079. These invoices should be copied to the FSA samplinggrants@foodstandards.gsi.gov.uk so that we can claim costs from the EU Commission.

8.2. The cost of sampling and analysis will be paid to LAs by the FSA. A standard sample rate of £30 will be provided and further details about payment will be provided to LAs when we send out Purchase Order numbers for the work. Payment will be made by BACS to participating LAs. All invoices should be sent to electronically to our Finance Section at SSD.APAgencies@defra.gsi.gov.uk copying samplinggrants@foodstandards.gsi.gov.uk

Contact name: Michelle Young
Cost centre code: 85210
Account code: 2449
Project title: Authenticity of honey study
Project code: FS101079

Purchase Order number: For LAs in England, Wales and NI this will be emailed to you as part of the National Coordinated sampling grant PO. Separate information will be issued for Scottish LAs

All invoices should be submitted by 31 July 2015 to ensure prompt payment.

Annex B – Breakdown of Regional groups participating in the study and the number of samples to be taken in England

	BIPs	Producers	Importer or wholesaler	Packaging establishments	Distribution or retail	Total
Part A (UK origin)	Centsa	1		1	1	
	EETSA	1		2		
	London FG	1		1	2	
	NE Food group	1				
	Swercots	1		1		
	TSNW	1				3
	YAHTSG	1		1		
	TSEM	1		1	1	
	TSSE					3
	Total	8			7	12
Part B (Non UK)			3	3		
	Centsa					
	EETSA		2	2	1	
	London	2	1			
	NE group				2	
	Swercots	1	1	1	2	
	TSNW	2	2	2	2	
	YAHTSG		1	1	3	
	TSEM		1	1	2	
	TSSE				1	2
Suffolk Coastal	2					
Southamp	4					

	ton PHA							
	London PHA	4						
	Total	10	5	10	10	15	50	
Part C (blended)	Centsa		1				1	
	EETSA		2	1	1			
	London		2	1	2			
	NE group			1	1		1	
	Swercots		1	1	1		2	
	TSNW		2	2	2		1	
	YAHTSG		1	1	1		2	
	TSEM		1	1	1		1	
	TSSE		2	2	2		2	
	Suffolk Coastal	2						
	Southamp ton PHA	4						
	London PHA	2						
	Total	8	12	10	10	10	50	

