

Mandatory listing of establishments exporting honey, and clarifications on animal products

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Non-EU countries will be required to list all establishments exporting honey to the EU

Commission Delegated Regulation (EU) [2023/2652](#) of 15 September 2023 amending and correcting Delegated Regulation (EU) 2022/2292 with regard to requirements for the entry into the Union of honey, meat, highly refined products, gelatine capsules, fishery products and requirements for private attestation and amending Delegated Regulation (EU) 2021/630 as regards private attestation requirements for composite products exempted from official controls at border control posts

Update

The EU will require non-EU countries to provide a list of all the establishments within that country that are permitted to export honey and apiculture products to the EU. In addition, this Regulation makes some clarifications to facilitate trade in products of animal origin (fishery products, meat products, highly refined products, and gelatine capsules).

Impacted products

honey, fishery products, meat, highly refined products, gelatine capsules

What is changing?

Honey and apiculture

The most significant change in Regulation [2023/2652](#) concerns honey exported to the European Union. Previously, while non-EU countries had to be approved by the EU in order to export honey, individual businesses within those countries did not have to be listed by the EU. Under the new rules, exporting countries will have to provide the EU with a list of all the individual establishments that export honey. Exporting countries will have to communicate this list to the European Commission and keep it up to date. These lists will be available on the Commission's [Establishment Lists](#) webpage.

This requirement applies to honey and other apiculture products falling under Harmonized System (HS) customs codes 0409, 0410, 1212, 1521, and 1702.

The new Regulation clarifies which honey and apiculture products these new requirements will apply to by referring to the existing definition of honey in Directive [2001/110/EC](#) (see Background).

Primary producers and businesses involved in transporting and storing honey do not have to be listed (Regulation [2022/2292](#), Art. 14).

Regulation [2023/2652](#) also clarifies and corrects a number of requirements in existing legislation concerning the entry of certain products of animal origin into the EU. This is to ensure that these requirements are clear and consistent.

Fishery products

The new Regulation (2023/2652) clarifies that fishery products from wild catch are exempt from Arts 6–12 of Regulation [2022/2292](#). Article 5 of Regulation 2022/2292 will be adjusted accordingly. This is because the major risk related to wild catch is contamination from the environment, which is already covered by Article 4, as well as by Regulation [2019/627](#) regarding controls of fishery products by non-EU competent authorities.

Meat products

The new Regulation (2023/2652) clarifies that non-EU suppliers of certain meat products may source raw materials from EU Member States as well as from non-EU countries, provided that the raw materials come from listed establishments in non-EU countries that are already approved to export these raw materials to the EU. This applies to fresh meat, minced meat, meat preparations, mechanically separated meat, certain meat products, and raw materials for the production of gelatine and collagen. Regulation 2022/2292 (Art. 15) will be amended accordingly.

The words “processed meat” in Regulation 2022/2292 will be replaced by “meat products”, because the term “processed meat” is not defined as such in EU legislation.

Regulation 2022/2292 (Art. 21) will be amended to clarify that the requirement to issue official certificates to accompany certain animal products exported to the EU also applies to consignments of live food-producing animals.

Gelatine and collagen

Regulation [2022/2292](#) (Art. 21(1)) states that shelf-stable composite products containing gelatine and collagen do not require official certification. Article 21(1), point (f), of that Regulation will be amended to explain that this derogation does not apply when the gelatine and collagen is derived from ruminant bones (this means gelatine and collagen from ruminant bones do require official certification).

The same applies to gelatine capsules, empty or filled. Capsules that are not derived from ruminant bones do not require official certification. But where capsules have content of animal origin, that content is subject to the relevant certification requirements that apply to products of

animal origin.

Composite products

Shelf-stable composite products where the only animal-derived content is food improvement agents (vitamin D3, food additives, food enzymes, or food flavourings) are not subject to mandatory official controls at EU border control posts. However, a private attestation has been required for these products. As the risk for human and animal health associated with this quantity of animal product is considered negligible, this private attestation requirement is now being lifted. Regulation [2022/2292](#) Art. 22(2) will be amended to clarify that a private attestation will not be required for these products.

Why?

Honey

In early 2023, the EU reported that [46% of honey on the European market](#) is suspected of being adulterated. In response to these worrying findings, the EU has introduced reinforced controls on imported honey. Identifying individual suppliers of honey will help EU Member States carry out controls at the EU border. Having a list of authorised establishments in exporting countries is already a requirement for most other products of animal origin (Regulation [2017/625](#), Art. 127(3)).

Meat products

Products of animal origin are allowed into the EU if they are derived from raw materials obtained in Member States, because they already comply with EU legislation.

Timeline

Date of publication: 28 November 2023.

Date of application: 18 December 2023.

Note that there is a transitional period for the obligatory listing of establishments that export honey and apiculture products to the EU: this new requirement will apply from **29 November 2024**.

What are the major implications for exporting countries?

Listing of establishments

Competent authorities in countries exporting honey and apiculture products to the EU must submit their first list of establishments (name, address, activities) to the European Commission before the new Regulation is applied on **29 November 2024**. After that date, only establishments that are listed on the Commission's [Establishment Lists](#) webpage will be able to export honey to the EU.

This list must be maintained, and the competent authority in each exporting country will be responsible for keeping the list up-to-date.

An [Establishment Listing User Guide](#) in TRACES-NT gives step-by-step instructions for non-EU countries on how to register new establishments. It requires a minimum time for the Commission to examine the list submitted. **Non-EU exporters should start the process as soon as possible** using the TRACES digital tool.

Controls in exporting countries

According to Regulation 2022/2292, imported animal products must meet food safety requirements that are at least equivalent to those set out in the EU legislation. Establishments that export honey and apiculture products need to be registered and regularly audited by their country's authorities.

Under the new rules, competent authorities in exporting countries must carry out controls to ensure the establishments that are listed and communicated to the EU are fully compliant with EU legislation. This includes (among others) compliance with hygiene requirements; and the integrity of honey, which must not contain any other food ingredients or additives. For more information see Regulation [852/2004](#) on [residues](#) (Art. 5 and Annex II); the requirement on [antimicrobials](#); and the honey Directive [2001/110/EC](#) (Annexes I and II).

Non-EU country authorities will also need to demonstrate that they have real powers to stop exports to the EU if any establishment fails to meet the relevant EU requirements (or those recognised to be at least equivalent).

The EU [official health certificates](#) for exports to the EU will be modified to reflect the new requirements.

Exclusion of primary producers

Primary producers, and businesses involved in transporting and storing honey, will not have to be listed under the new rules. Primary producers are those:

- producing honey and other food from bee production

- undertaking beekeeping activities (even if beehives are not on the beekeeper's premises), including collection of honey, its centrifugation, and wrapping and/or packaging at the beekeeper's premises (see Commission Guidance document On the hygiene of foodstuffs, p. 7).

Businesses performing operations outside the beekeeper's premises (e.g. centrifugation and/or wrapping/packaging of honey), including those carried out on behalf of beekeepers by collective establishments such as cooperatives, are not primary producers and should be listed if they are exporting to the EU.

Recommended Actions

In consultation with the apiculture sector, competent authorities in exporting countries should have in place a system to ensure there will be no disruption of trade in honey and apiculture products from **December 2024**. Authorities should enter the details in TRACES each time they authorise a new establishment.

Background

The regulations governing the import of animals and animal products into the EU aim to ensure high levels of public health and consumer protection for European citizens.

The overall rules for controlling compliance with food safety and animal health, including measures to combat fraud and protect consumer interests, are laid down in the Official Controls Regulation (EU) [2017/625](#). This is supplemented by Regulation [2022/2292](#) which aims to ensure that imported animal products meet food safety requirements that are at least equivalent to those in the EU legislation.

Regulation [2019/1873](#) lays down rules on procedures at border control posts for official controls on certain products entering the EU. The competent authorities must indicate the establishment where the products originated, which will appear on a list drawn up in accordance with Regulation 2017/625.

Definitions

The current definition of "honey" in Directive [2001/110/EC](#) is the "natural sweet substance produced by *Apis mellifera* bees from the nectar of plants or from secretions of living parts of plants or excretions of plant-sucking insects on the living parts of plants, which the bees collect, transform by combining with specific substances of their own, deposit, dehydrate, store and leave in honeycombs to ripen and mature".

“Apiculture products” are defined as honey, beeswax, royal jelly, propolis, or pollen intended for human consumption.

Resources

Online resources from the European Commission:

- Guidance document on the implementation of certain provisions of Regulation (EC) No 852/2004: On the hygiene of foodstuffs.
- Establishment Amendments Lists User Guide for third countries’ authorities

Official Controls Regulation (EU) [2017/625](#)

Regulation (EU) [2022/2292](#) on requirements for entry into the Union of consignments of food-producing animals and certain goods intended for human consumption

Regulation [2021/630](#) as regards certain categories of goods exempted from official controls at border control posts

Regulation [2023/119](#) as regards rules for entry into the Union, and the movement and handling after entry of consignments of certain animals, germinal products and products of animal origin

Sources

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