

GUIDANCE

Exporting Honey to the European Union

**AN INTRODUCTION TO
EVOLVING EU REGULATIONS**

October 2026
V2



**Funded by
the European Union**



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1. INTRODUCTION

Consumer demand for honey in the European Union is growing, and outstrips EU domestic production. The EU is the world's second largest importer of honey; its 175,000 t/year imports make up around 40% of EU domestic needs.¹

Because it is not self-sufficient in honey production, the EU is a significant potential export market for suppliers of honey from low- and middle-income countries. At the same time, honey is subject to many EU rules that regulate its safety and quality. Recent investigations found that a significant part of the honey imported into the EU is suspected not to comply with the EU Honey Directive ([2001/110/EC](#)).² As a result, the EU is putting in place more stringent rules and increased controls to guarantee higher quality standards for honey, and a fair and competitive European marketplace.

Non-EU suppliers and competent authorities in exporting countries must adapt to these new rules, including significant changes in 2024 and 2026, so that these businesses can continue to sell honey on the EU market.

This short Guide gives an overview of the main EU requirements that must be met in order to export honey to the EU. It highlights some of the significant upcoming changes, and explains how to comply with the new rules. It is intended to help businesses and competent authorities navigate EU rules; it is not a comprehensive basis for ensuring compliance. Honey exporters should carefully read and apply the relevant legislation referred to in this Guide.

Key requirements for exporting honey to the EU

1. **Get authorised:** The exporting country must submit to the European Commission a control plan to prove its honey does not contain non-compliant residues of pesticides, veterinary medicines, or contaminants.
2. **Use listed establishments:** Every honey establishment must be officially approved and put on a public EU list.
3. **Control the use of antimicrobials:** Exporting countries must have strict rules in place to guarantee, by signing the relevant certificates, that the honey is produced from bees that have never received certain banned medicines or antibiotics (this rule applies from **3 September 2026**).
4. **Label it correctly:** The exported honey must follow EU rules on what it contains and how it is labelled. These rules are in the EU Honey Directive, with some additional rules applying from **14 June 2026**.

¹ European Commission (2023) [EU coordinated action “from the hives”: Sampling, investigations and results](#).

² Of 320 samples taken at EU borders, 147 (46%) were suspected of being non-compliant with the provisions; see AGRINFO report on [adulterated honey](#).



2. WHAT IS HONEY?

In the EU, honey is defined as: *“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.”*³

It is forbidden to add anything to the natural substance (either sugar, or any additives or ingredients).

**honey is honey
nothing else**

**No additives, no added
sugar...**

If anything is added to the natural substance, the product cannot be sold on the EU market as honey.

In order to fight against adulteration, the EU defines the composition criteria for honey in its [Honey Directive](#). Annex II of the Directive sets out detailed composition criteria (see Annex I of this Guide).

Honey must not contain any other food ingredients or additives, and as far as possible it must be free from organic or inorganic foreign matter. With the exception of baker's honey (see Annex II of this Guide for the types of honey), honey must not have any foreign tastes or odours, must not have begun to ferment, and must not have artificially changed acidity, or have been heated so that the natural enzymes have been destroyed or significantly inactivated.

Only honey that complies with the composition criteria may be exported to the EU.

3. KEY REQUIREMENTS FOR EXPORTING HONEY TO THE EU

Requirement 1: Exporting countries must be authorised

The exporting country must submit to the European Commission a control plan to prove its honey does not contain non-compliant residues of pesticides, veterinary medicines, or contaminants.

For most animal products, countries exporting to the EU must be authorised and listed for export in relation to four sets of rules. These are: public health, animal health, residue control plans, and – since 3 September 2026 – the use of certain antimicrobial medicines.

For honey, exporting countries must be authorised for two of these: residue control plans, and the use of certain antimicrobial medicines.

Residue control plan for honey

List of approved countries

A business can export honey to the EU only if that country's capacity to control and manage the presence of residues in honey has been demonstrated and accepted by the EU.

³ EU Honey Directive [2001/110/EC](#).



For the current list of non-EU countries approved to export honey to the EU, see Annex -I of Regulation [2021/405](#) (for the latest list click on “Consolidated version” or “Access current version”). As of October 2026, 39 low- and middle-income countries ([AGRINFO partner countries](#)) were approved to export honey to the EU in relation to their residue control plan (Box 1).

Box 1. Residue control plan – low- and middle-income countries authorised to export honey to the EU

Argentina	Georgia	Nicaragua
Armenia	Guatemala	North Macedonia
Belarus	India	Rwanda
Benin	Kazakhstan*	Serbia
Bosnia and Herzegovina	Kyrgyz Republic	Tanzania
Brazil*	Lebanon	Thailand
Burkina Faso	Madagascar	Togo
Cameroon	Mauritius [triangular trade]	Türkiye
China	Mexico	Uganda
Cuba	Moldova	Ukraine
Dominican Republic	Montenegro	Viet Nam
El Salvador	Morocco	Wallis and Futuna
Ethiopia	Myanmar	Zambia

* Not listed in Annex XVIa of Regulation [2021/405](#) – see Box 2.

How to get listed

To be listed, a country wishing to export honey to the EU must have an approved residue control plan. This plan sets out the number of honey products that are tested by the country’s authorities to ensure they contain no unauthorised substances (banned pesticides, contaminants), and that any authorised substances (veterinary medicines) comply with EU law.

Countries can apply to the European Commission to be listed. See Box 2 for the procedure to follow.

The residue control plan covers compliance with EU requirements on:

- veterinary drug residues: Regulations [2022/1644](#) and [2022/1646](#)
- contaminants: Regulations [2022/931](#) and [2022/932](#)
- pesticide maximum residue levels (MRLs): Regulation [396/2005](#).^{4,5}

⁴ European Commission (2024) [Guidelines on EU requirements for entry of animals and products of animal origin: Control plans for residues of veterinary medicines, pesticides and contaminants](#).

⁵ See AGRINFO reports on official controls of: [veterinary drug residues in products of animal origin](#); [pharmacologically active substances and residues](#); [contaminants in foods](#). Also see [EU pesticide regulations \(maximum residue levels\) explained](#).



Each non-EU country establishes its own residue control plan, taking account of the risks relevant to its own regional and national context.

Box 2. Residue control plan – listing procedure

1. Non-EU countries should submit their residue control plan to the European Commission (according to Regulation [2022/2292](#), Art. 6.2; see [Public health requirements for exporting live animals, products of animal origin, composite products and sprouted seeds to the EU](#)).
 - The requirements to be filled in are detailed in the Commission's [Guidelines on EU requirements for entry of animals and products of animal origin](#).
 - The residue control plan must be completed according to a “Plan Template” given in section 4.4 of those Guidelines (for honey, Excel sheets 55–58). Explanations on how to complete the tables can be found in sheets a–e.
2. The European Commission will examine the submitted residue control plan. If it meets the EU requirements, the plan will be approved.
3. Following approval, Regulation [2021/405](#) is updated (once or twice a year). See [Third country lists for public health – explained](#).
4. To remain on the list, competent authorities of exporting countries must send an updated residue control plan **every year before 31 March**.

Use AGRINFO's [Pesticide MRL Tracker](#) to keep up to date on recent and upcoming changes to pesticide MRLs.

Use of antimicrobials in honey production

List of approved countries

Since **3 September 2026**, exporting countries must also be included in the list of non-EU countries authorised to export honey to the EU with regard to compliance with the rules on antimicrobial medicines. This list of countries is in Regulation [2021/405](#), Annex XVIa. See [List of non-EU countries compliant with new EU antimicrobial requirements](#).

How to get listed

To be listed in Annex XVIa, honey-exporting countries must provide the European Commission with adequate guarantees and evidence that antimicrobials reserved for treatment of certain infections in humans⁶ are not used in the production of honey.⁷

⁶ The list of antimicrobials reserved for human treatment is in Regulation [2022/1255](#). See [List of antimicrobials reserved for treatment of certain infections in humans](#).

⁷ These rules were introduced by Regulation [2023/905](#), which aims to combat concerns about increased resistance to antimicrobials. See [Rules on prohibited antimicrobials in imported animal products](#); and European Commission (2024) [State of play concerning the implementation of Commission Delegated Regulation \(EU\) 2023/905](#).



Only countries listed as having an authorised residue control plan can be listed for compliance with the rules on antimicrobials. The country must be listed for each farmed animal product it wishes to export to the EU.⁸

A country must therefore be explicitly listed for honey in both Annex -I of Regulation [2021/405](#) and Annex XVIa of Regulation [2021/405](#).

Requirement 2: Exporting establishments must be authorised

Every honey establishment must be officially approved and put on a public EU list.

List of approved establishments

To export honey to the EU, the “establishment” (the unit in a business where honey is being produced) must be authorised for export according to EU rules. **Only establishments that are listed on the European Commission’s [Establishment Lists](#) webpage can export honey to the EU** (Regulation [2023/2652](#)). If a honey business has multiple honey production units, each unit is considered to be an “establishment” and requires approval and listing. This requirement applies to honey and other apiculture products under Harmonized System (HS) customs codes 0409, 0410, 1212, 1521, and 1702. See [Mandatory listing of establishments exporting honey](#).

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

How to get listed

National competent authorities of non-EU countries should designate one or more National Contact Points that can enter and maintain the data on honey businesses in the EU’s online platform for certification (Trade Control and Expert System, [TRACES](#)).⁹ Competent authorities are responsible for auditing establishments regularly and keeping the list of honey establishments up to date in TRACES.

The list of approved establishments can be viewed on the European Commission’s [Establishment Lists](#) webpage.

Only establishments that meet food safety and hygiene rules that are equivalent to the EU’s requirements can be included on the list. These requirements fall into two main categories that are shown below.

⁸ European Commission (2023) [Specifications as regards the listing of third countries and the amendments of the official export certificates](#).

⁹ TRACES documentation provides guidance on [Listing of EU approved establishments](#), with step-by-step instructions for non-EU country authorities on how to register new establishments. Resources from AGRINFO’s September/October 2025 webinars on [Using TRACES](#) include videos, presentation slides, and Questions & Answers, available in English, French, and Spanish. For any additional questions, email agrinfo@colead.link



Hygiene rules (Regulation [852/2004](#)), in particular:

- the establishment must be nationally authorised, and must implement a self-control system based on hazard analysis and critical control points (HACCP)¹⁰ principles (Art. 5)
- honey must be handled, prepared, packed, and stored in a hygienic manner (Annex II)
- honey must meet the general hygiene requirements regarding primary production (Annex I) and other stages of production, processing, and distribution (Annex II).

Principles of the EU General Food Law (Regulation [178/2002](#)), including:

- food must be safe – food safety is a prerequisite
- operators have a primary responsibility and obligation to submit to official controls and collaborate with competent authorities
- food and feed must be traceable at all stages: every food business operator in the chain must keep records of its immediate supplier/s (one step before) and its immediate customer/s (one step after) (related Regulation [931/2011](#))
- consumers' interests must be protected (fight against fraud, adulteration, misleading practices).

Requirement 3: Model certificates

The exporting country must have strict rules in place to guarantee, by signing the relevant certificates, that the honey is produced from bees that have never received certain banned medicines or antibiotics (this rule applies from **3 September 2026**).

Model certificate for honey (HON)

Model certificates are updated regularly, and authorities issuing these certificates must ensure that only the latest version is used.

Each consignment of honey exported to the EU must be accompanied by a **model certificate for honey (HON)**. When signing this certificate, competent authorities in the non-EU country certify that the honey was produced in compliance with:

- the EU's General Food Law (Regulation [178/2002](#)) and food safety/hygiene requirements (Regulations [852/2004](#) and [853/2004](#))
- the obligation to submit a residue control plan and to be on the list of authorised countries (Regulation [2022/2292](#), Art. 3.)
- product description and composition criteria (Directive [2001/110/EC](#), Annexes)
- from **3 September 2026**, the obligation to include an antimicrobial attestation in the model certificate.

¹⁰ See [Commission Notice](#) on the implementation of food safety management systems covering good hygiene practices and procedures based on the HACCP principles; also see [Updated Commission guidance on food safety management systems](#).



How to find the latest version of the certificate

Model certificate HON is found in Regulation [2020/2235](#), Annex III, Chapter 45 (click on “Latest consolidated version”). See [EU official health certificates for exports to the EU – explained](#).

The certificate is updated regularly and only the most up-to-date version must be used. Using [TRACES](#) is a good way to avoid mistakes, as TRACES automatically displays the latest version.

To be able to sign the certificates, competent authorities of non-EU countries must **regularly audit the operators** to check if production is compliant with the Regulations mentioned in the certificate.

The antimicrobial attestation

Since **3 September 2026**, the updated model certificate HON includes an antimicrobial attestation that must be signed by the official authorities of exporting countries (Regulation [2020/2235](#)). See [Model health certificates: antimicrobial attestation](#), and [EU official health certificates for exports to the EU – explained](#).

The attestation is as follows:

II.1.a. Attestation as regards Commission Delegated Regulation (EU) 2023/905 [*Delete when the Union is not the final destination of the honey and other apiculture products*]

I, the undersigned, declare that I am aware of the relevant requirements of Regulation (EU) 2019/6 of the European Parliament and of the Council and Commission Delegated Regulation (EU) 2023/905 and hereby certify that the honey and other apiculture products described in Part I were produced in accordance with these requirements, and in particular that the animals from which the honey and other apiculture products are obtained have not been administered antimicrobial medicinal products for growth promotion or yield increase or antimicrobial medicinal products containing an antimicrobial that is included in the list of antimicrobials reserved for the treatment of certain infections in humans laid down in Commission Implementing Regulation (EU) 2022/1255 as set out in Article 3 of Delegated Regulation (EU) 2023/905 and originate from a third country or region thereof listed in accordance with Article 5(2) of Delegated Regulation (EU) 2023/905.

The new rules regarding antimicrobials require a system to be in place to ensure that exported honey was produced by bees that have never received antimicrobials reserved for human treatment during their entire life span. This includes honey produced before 3 September 2026, if it is exported after that date.

Proof of compliance is facilitated if the exporting country has laws banning the same antimicrobials as the EU; or if the country has a system of authorising medicines placed on the market, and can check that those for bees do not contain the banned antimicrobials.

If the exporting country does not have a system to ban the use of antimicrobials reserved for human treatment, then operators must put in place a segregated channel to ensure that only honey compliant with EU requirements is exported to the EU.

In all cases, the authorities must perform official controls to check compliance.

Where honey is a blend from several origins, the honey from another operator or another non-EU country must also be compliant. In this case, the non-EU country must also be authorised to export honey to the EU (see Requirement 1), the honey must come from a listed establishment (Requirement 2), and the non-EU



country must guarantee that the honey comes from bees that have never received antimicrobials reserved for human treatment.

When a country imports honey that may not comply with EU rules, then it must put in place a strict and documented traceability system to ensure that non-compliant honey is not mixed with honey intended for the EU market. It is recommended that establishments producing honey for export to the EU should not accept non-compliant honey on site. This particularly applies to small and medium companies for which traceability could be challenging.¹¹

Exception: requirements for honey samples

Honey establishments may wish to send samples of honey to the EU for quality testing and organoleptic analysis. EU Member States can choose to allow honey samples to enter the EU *without* being accompanied by certificate HON or undergoing official controls at border control posts. Specific rules for exporting such samples to the EU are set out in Regulation [2019/2122](#), Art. 4.3. The operator responsible for the analysis or testing of samples must have prior authorisation to import the samples from the competent authority into the EU Member State where the analysis is carried out. This exception potentially allows operators that are not yet listed to explore the possibility of marketing honey in the EU.

Requirement 4: Compliance with EU honey standards

The exported honey must follow EU rules on what it contains and how it is labelled. These rules are in the EU Honey Directive, with some additional rules applying from **14 June 2026**.

From **14 June 2026**, for honey that is a blend of honeys from different countries, all countries of origin must be indicated on the label, including the percentage of honey from each country, listed from largest to smallest in terms of its share in weight in the honey blend.

All food products exported to the EU market must comply with all aspects of EU food law. An overview of the most significant and relevant rules is included in Annex III of this Guide. In addition, honey exporters must comply with specific standards set out in the EU Honey Directive ([2001/110/EC](#)), which were revised in 2024 (Directive [2024/1438](#); see [Revised marketing standards for honey, fruit juices, fruit jams, and preserved milk](#)). These changes are particularly relevant to those exporting final consumer products, as opposed to honey in bulk.

Marketing standards in the EU Honey Directive

Honey exported to the EU market must be labelled according to EU requirements.

- **Name:** The Honey Directive defines the terms that may be used on traded honey products, including honey, blossom honey, nectar honey, and honeydew honey (see Annex II of this Guide). In the cases of filtered honey, comb honey, chunk honey or cut comb in honey, and baker's honey, these names

¹¹ See AGRINFO Guidance on [Use of antimicrobials in farmed animals in the food supply chain](#), and the video and presentation from AGRINFO's May 2026 webinar on [Use of antimicrobials in farmed animals](#).



may not be replaced by the single product name “honey”. In the case of baker’s honey, the words “intended for cooking only” must be on the label next to the product name. The product name may be supplemented with further information on floral or vegetable origin, regional territorial or topographical origin, and specific quality criteria (except for filtered honey and baker’s honey).

- **Origin labelling:** From **14 June 2026**, all the countries of origin where the honey has been harvested must be indicated on the label in the principal field of vision, including the percentage of honey from each country, listed from largest to smallest in terms of its share in weight in the honey blend. A 5% margin of tolerance is permitted for each individual share within the blend.¹² For small packs of less than 30 g, the names of the countries of origin may be replaced by a two-letter code in line with ISO 3166.
- **Filtered honey:** Under the new rules from 14 June 2026, the term “filtered honey” is completely removed from the Honey Directive and its definition is incorporated into the definition of baker’s honey in Annex I, point 3 of the Directive (see [Revised marketing standards for honey](#)).

4. BE PREPARED

Be ready for audits/remote assessments

The European Commission conducts regular controls (audits and remote assessments) of both EU Member States and non-EU countries to ensure the highest standards of food safety and regulatory compliance of goods put on the EU market (see [EU Food and Veterinary Audits Programme 2027](#)).

All residue control plans of non-EU countries are checked at least once every 5 years through remote assessments. These remote assessments, also called “desk-based audits”, are based on comprehensive questionnaires. Responding to these questionnaires involves documenting all procedures, controls, and corrective actions that are taken to align with EU requirements.

A negative outcome of an audit or remote assessment performed by the Commission in a non-EU country may result in the imposition of trade-restrictive measures. Examples of such measures include increased checks at EU borders and, as a last resort, suspension of imports.

Stay up to date

Honey is currently the subject of considerable regulatory attention by the EU. The European Commission is preparing new requirements¹³ on:

- composition criteria to ensure that honey (except baker’s honey) has not been heated or treated in a way that destroys or significantly deactivates the natural enzymes, taking into account the invertase index

¹² To provide flexibility, individual EU Member States may allow in their national legislation an alternative option where the four largest shares, if together representing more than 50% of the blend, should be indicated as percentages, and the remaining countries of origin do not have to indicate the percentage.

¹³ Council Directive [2001/110/EC](#), Art. 4a



- criteria to ensure and verify that pollen is not removed from honey
- minimum content of pollen in baker's honey
- methods and criteria to determine where honey has been harvested, and traceability requirements.

The Commission is assisted by a [Honey Platform](#) that gathers the best available expertise on honey authenticity and traceability.¹⁴ The EU plans to adopt the new requirements by 14 June 2029. Until then, honey will be controlled according to internationally recognised methods of analysis such as those approved by the international standard-setting body Codex Alimentarius.

To keep up to date with upcoming changes, [subscribe](#) to AGRINFO updates.

Or send your [Questions](#) to the AGRINFO team.

¹⁴ European Commission (2024) [Clearer rules on origin and composition of honey: Commission sets up Honey Platform](#). News, 13 June.



ANNEXES

Annex I – Composition criteria for honey

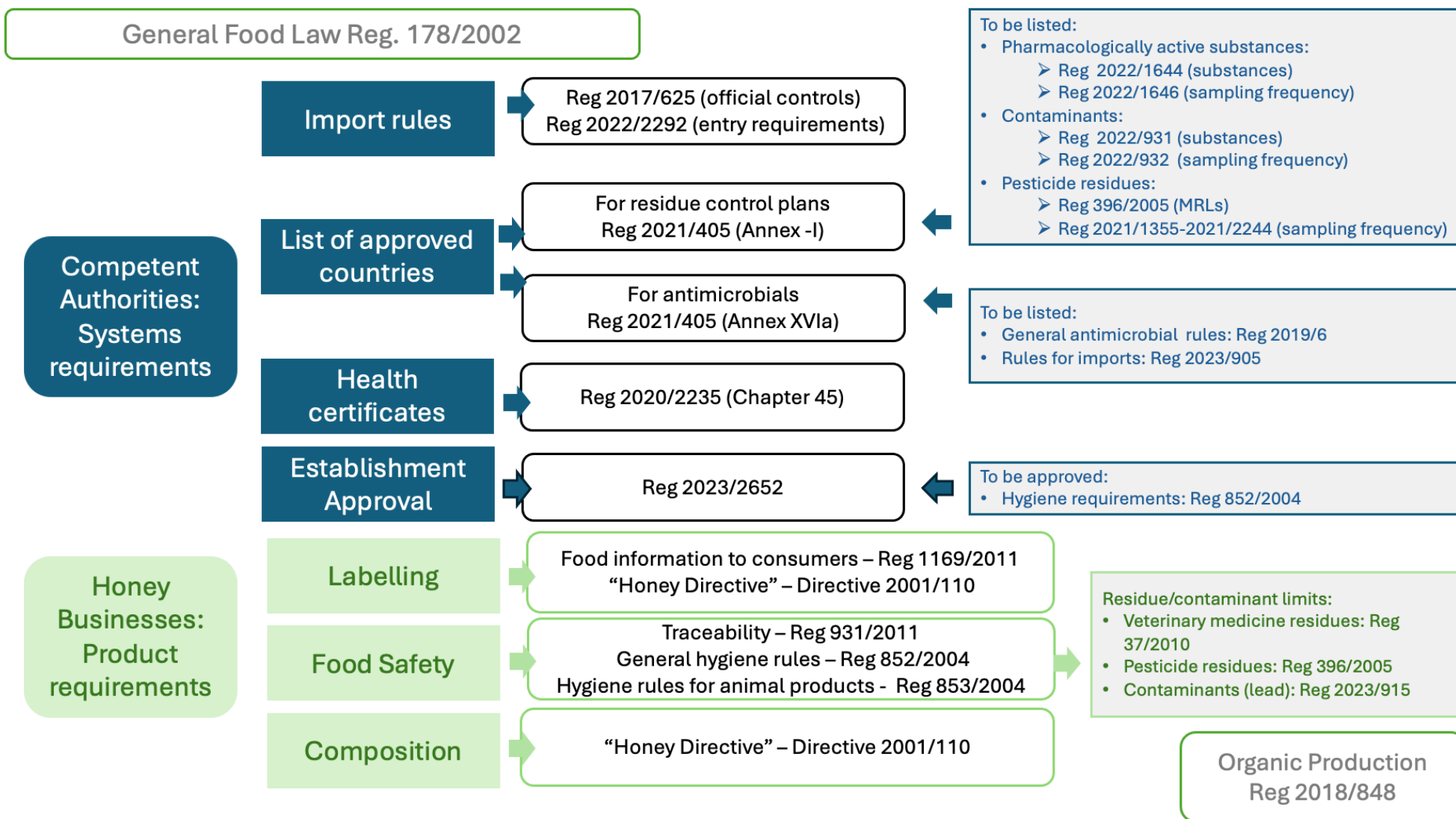
Content	Composition
Fructose and glucose content (sum of both)	
Blossom honey	Not less than 60/100 g
Honeydew honey, blends of honeydew honey with blossom honey	Not less than 45/100 g
Sucrose content	
In general	Not more than 5/100 g
False acacia (<i>Robinia pseudoacacia</i>), alfalfa (<i>Medicago sativa</i>), Menzies banksia (<i>Banksia menziesii</i>), French honeysuckle (<i>Hedysarum</i>), red gum (<i>Eucalyptus camadulensis</i>), leatherwood (<i>Eucryphia lucida</i> , <i>E. millii ganii</i>), <i>Citrus</i> spp.	Not more than 10/100 g
Lavender (<i>Lavandula</i> spp.), borage (<i>Borago officinalis</i>)	Not more than 15/100 g
Moisture content	
In general	Not more than 20%
Heather (<i>Calluna</i>), baker's honey in general	Not more than 23%
Baker's honey from heather (<i>Calluna</i>)	Not more than 25%
Water-insoluble content	
In general	Not more than 0.1/100 g
Pressed honey	Not more than 0.5/100 g
Electrical conductivity	
Honey not listed below, and blends of these honeys	Not more than 0.8 mS/cm
Honeydew and chestnut honey; blends of these except with: strawberry tree (<i>Arbutus unedo</i>), bell heather (<i>Erica</i>), eucalyptus, lime (<i>Tilia</i>), ling heather (<i>Calluna vulgaris</i>), manuka or jelly bush (<i>Leptospermum</i>), tea tree (<i>Melaleuca</i>)	Not less than 0.8 mS/cm
Free acid	
In general	Not more than 50 milliequivalents (mEq) acid per 1,000 g
Baker's honey	Not more than 80 mEq acid per 1,000 g
Diastase activity and hydroxymethylfurfural (HMF) content determined after processing and blending	
Diastase activity (Schade scale)	
In general, except baker's honey	Not less than 8 Schade units
Honeys with low natural enzyme content (e.g. citrus honeys) and HMF content not more than 15 mg/kg	Not less than 3 Schade units
HMF content	
In general, except baker's honey	Not more than 40 mg/kg (subject to provisions of diastase activity)
Honeys of declared origin from regions with tropical climate, and blends of these honeys	Not more than 80 mg/kg
Source: Honey Directive 2001/110/EC , Annex I	



Annex II – Main types of honey

Classification	Name	Definition
According to origin:	Blossom honey or nectar honey	Honey obtained from the nectar of plants
	Honeydew honey	Honey obtained mainly from excretions of plant-sucking insects (<i>Hemiptera</i>) on the living parts of plants or secretions of living parts of plants
	Comb honey	Honey stored by bees in the cells of freshly built broodless combs or thin comb foundation sheets made solely of beeswax and sold in sealed whole combs or sections of such combs
According to mode of production and/or presentation:	Chunk honey or cut comb in honey	Honey that contains one or more pieces of comb honey
	Drained honey	Honey obtained by draining decapped broodless combs
	Extracted honey	Honey obtained by centrifuging decapped broodless combs
	Pressed honey	Honey obtained by pressing broodless combs with or without the application of moderate heat not exceeding 45°C
	Filtered honey*	Honey obtained by removing foreign inorganic or organic matter in such a way as to result in the significant removal of pollen
Baker's honey		Honey that is suitable for industrial uses or as an ingredient in other foodstuffs which are then processed; and that may: • have a foreign taste or odour, or • have begun to ferment or have fermented, or • have been overheated
* Directive 2024/1438 amends the Honey Directive to remove the term “filtered honey” and incorporate its definition in the definition of baker's honey (Annex I, point 3). Source: Honey Directive 2001/110/EC, Annex I		

Annex III – Overview of significant EU laws on exporting honey to the EU





GROWING PEOPLE

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