



HWBKA Honey Sales and Food Hygiene

There has been a succession of legislation which covers the bottling and sale of honey for the small producer, the most recent of which is The Honey (England) Regulations 2015. The nature of the regulation is that it needs to be read in conjunction with previous legislation. Below I have tried to simplify the current situation as it applies to small producers of honey sold at farm gate or fairs and fêtes as would apply to the vast majority of our members.

Each food authority (in our case local County Councils) must enforce and execute the Regulations in its area.

If an authorised officer of a food authority has reasonable grounds for believing that a person is failing to comply with the above regulation, the authorised officer may issue an improvement notice which will:

- (a) state the officer's grounds for believing that the person is failing to comply with the relevant provision;
- (b) specify the matters which constitute the person's failure so to comply;
- (c) specify the measures which, in the officer's opinion, the person must take in order to secure compliance; and
- (d) require the person to take those measures, or measures that are at least equivalent to them, within such period (not being less than 14 days) as may be specified in the notice."

A person found guilty of an offence shall be liable, on summary conviction, to a fine.

In all there are four fundamental criteria individuals need to be aware of to remain compliant:

- 1) Ensuring the honey you sell is legally compliant
- 2) Demonstrating general food hygiene during the processing and bottling phase
- 3) Keeping appropriate records
- 4) Using legally compliant labels

Below is a brief aide memoire for each of the above.

Section One

Ensuring the honey you sell is legally compliant

Schedule 1 of The Honey (England) Regulations 2015 specifies the compositional criteria of your honey. For the small producer the main provisions are:

1. The honey **consists** essentially of different sugars, predominantly fructose and glucose, as well as other substances such as organic acids, enzymes and solid particles derived from honey collection.
2. The **colour** varies from nearly colourless to dark brown.
3. The **consistency** can be fluid, viscous or partly or entirely crystallised.
4. The **flavour** and aroma vary but are derived from the plant origin.
5. **It must not:**
 - a) Have less than 60g/100g sugar (combined fructose and sucrose)
 - b) Have more than 20% moisture (water)
 - c) Have added food ingredients or any food additive or any other additives.
 - d) Have organic or inorganic matters foreign to its composition.
 - e) Have any foreign tastes or odours;
 - f) Have begun to ferment;
 - g) Have an artificially changed acidity;
 - h) Have been heated in such a way that the natural enzymes have been either destroyed or significantly inactivated.
 - i) Have had pollen or constituent particular to honey removed except where this is unavoidable in the removal of foreign inorganic or organic matter.
6. When taking honey from hives:
 - a) Only extract from fully ripe combs.
 - b) Ensure that supers are not placed directly on the ground when manipulating bees.
 - c) Ensure any equipment or vehicle used to transport supers is clean, e.g. line vehicles/ wheelbarrows etc. with clean plastic sheeting or stand supers in food-safe trays.

Section Two

Demonstrating general food hygiene during the processing and bottling phase

If you were ever to be inspected by food hygiene agencies you would have to demonstrate that you can meet the following criteria:

1) you (and anyone helping you)

- a) follow good hygiene practice
 - a. e.g. regular hand washing and dry on paper towel
 - b. use a hair net or tie back long hair
 - c. wear clean clothing and footwear
 - d. do not smoke
 - e. do not consume food or drink in the working vicinity

2) your working area

- a. All surfaces must be washable, easy to clean and disinfect including walls and floors.
- b. Ceilings must be constructed to prevent accumulation of dirt.
- c. Two sinks should ideally be available, one for hand washing and one for the equipment.
- d. Keep all doors and windows closed.
- e. Exclude domestic animals such as dogs and cats
- f. The premises should be free from vermin

3) your equipment

- a. Ensure all equipment is clean and dry and stored in hygienic conditions.
- b. If you borrow equipment always clean it first before use and then after use.
- c. Extract and bottle in a low humidity environment.
- d. When extracting honey use equipment made of food grade stainless steel, food grade plastic and glass.
- e. Filter honey to remove physical contaminants e.g. bee debris and wax. The recommended mesh size is 0.2mm which ensures some pollen remains.
- f. Store honey in hermetically sealed containers and tighten jar lids fully.
- g. All jars whether new or recycled must be of food grade standard and must be washed, as should the new lids. They are best washed in hot detergent and then rinsed in a solution of Milton following the instructions. Alternatively a dishwasher with a working temperature of 65°C or higher is sufficient, or use the oven method of sterilisation. Always make sure that that containers are freshly sterilised and dry before use.

Section Three

Keeping appropriate records

You should keep good records about each batch of honey you produce for sale with production dates, lot numbers etc. and the provenance (especially if you have hives in different locations) and destination (e.g. Crowborough Farmers' Market). Records should be retained for shelf life plus 6 months.

Practice stock rotation to minimise storage.

Section Four

Using legally compliant labels

The label should indicate (see reverse for details) –

- a. The description of the product.
- b. The name and address of the producer (within the EU).
- c. The country of origin.
- d. A 'Best before' date.
- e. A lot mark. This could be the "Best before" date see 4.
- f. The weight.

1. Description of product

This must be one of the following reserved descriptions:

- Honey.
- Comb honey.
- Chunk honey.
- Baker's honey intended for cooking only.
- The word 'honey' with any other true description e.g. Honeydew honey, Pressed honey, Blossom honey.
- The word 'honey' with a regional, topographical or territorial reference.

If there is any reference to a particular plant or blossom (this includes both pictures and words), the honey must have come wholly or mainly from that blossom or plant - i.e. the honey must be characterised by that blossom or plant. If reference is made to a geographical origin the honey must come wholly from that place.

2. Name and address of producer etc.

Sufficient information is needed in order to trace the producer by an address within the EU. So a post code alone will not suffice but postcode with house name or street and number would be traceable. A phone number or e-mail address could be used for repeat purchasers.

3. Country of origin

Honey must be labelled with the country in which the honey was harvested. In our case it could be 'Product of the UK' or 'Product of England' but must be IN ADDITION to the address.

4. Best before date

Honey will keep in good condition for many years if it is kept in an airtight container at a constantly low temperature but an appropriate durability or 'Best before' date must be given. Two years from the date of bottling is reasonable. If this specifies day month and year, a lot number is not required.

5. Lot Number

A lot means a batch of sales units of food produced, manufactured or packaged under similar conditions. It enables problems to be traced. The lot number is preceded by the letter "L" to distinguish it from other indicators. The number may be a short code comprising letters and/or numbers identifying the appropriate batch. It is prudent to have small lot sizes.

6. The weight

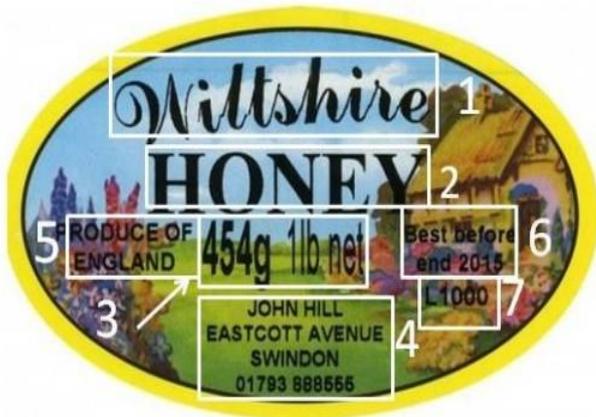
Honey can be sold in any weight including the traditional UK ones. Imperial units can be added after the metric ones but must not be in larger type and there must be no other print between them. The abbreviation for gram is "g" and for kilogram is "kg". An "s" must not be added. There must be one type space between the numerical value and the unit or its abbreviation.

Printing of labels

An easy option is to go with an off the shelf version available from beekeeping supplies websites as these are set up to be legislatively compliant. An example is shown below.

If you opt to print your own or have them bespoke printed you must observe the following:

- Printing must be clearly legible and permanent.
- Labels should be fixed to the side of the container.
- The lettering must be 3 mm high for weights between 50 and 200 g, 4 mm high for weights between 200 g and 1 kg and 6 mm high for greater weights. Only the weight declarations have to be the specified size.
- The criterion for the size of all the other statutory information is that it must be easy to understand, clearly legible, indelible, not interrupted by other written or pictorial matter and in a conspicuous place such as to be easily visible.
- The information given on the label must be true in every respect and in no way misleading.
- It is suggested that computer generated labels have the height of the lettering checked before printing a batch.



- 1) The Honey must come entirely from identified source.
- 2) Descriptor must not mislead and should conform to reserved descriptions.
- 3) Height of metric figures varies with weight. Metric figures must precede Imperial figures if used.
- 4) The Name and Address of producer, packer or seller.
- 5) It is mandatory to include the Country of Origin
- 6) Best before date: suggest 2 years. If day/month/year quoted, the Lot No: is not required.
- 7) The L precedes the Lot Number (ie the Batch Identification Code).

N.B. Many beekeepers write BBDs or Lot numbers on tamper proof strips rather than printed on label as this saves re-print costs for small batches.