

Advice for Honey Packers

The labelling & composition of honey for sale to consumers and catering establishments is controlled by The Honey (England) Regulations 2003, The Food Labelling Regulations 1996 & The Weights and Measures Act 1985 & the Packaged Goods Regulations 2006.

What labelling is required by the Regulations?

The minimum labelling requirements for prepacked products are:

1. The reserved description.
2. The country/countries of origin. (i.e. where the honey has been harvested.) Special provision exist for blends from more than one country.
3. The name and address of manufacturer, packer or supplier within the EC.
4. Any particular storage requirements.
5. An indication of minimum durability.
6. A lot mark
7. A metric weight indication.

Note: Where honey is prepacked for direct sale (i.e. sale by you from the premises on which you packed the honey or from your vehicle or stall) there are some exemptions which allow you to omit items 3 to 6 above. However, in this event you may need to include some type of lot mark coding to enable you to distinguish between different batches of honey.(see lot mark below)

What are reserved descriptions?

These are the names which must be used to describe the honey if it complies with the prescribed compositional standards.

Honey	Chunk Honey	Extracted Honey
Blossom Honey	Comb Honey	Pressed Honey
Nectar Honey	Cut Comb in Honey	Filtered Honey
Honeydew Honey	Drained Honey	Baker's Honey

Note: In the case of 'blossom honey', 'nectar honey', 'honeydew honey', 'drained honey' and 'pressed honey', the name applied may be either the appropriate reserved description or simply 'honey'. Additional clarifying words may be applied to the name e.g. 'clear', 'natural', etc, provided they do not mislead.

It is common practice to filter honey under pressure to remove unwanted matter, e.g. small pieces of comb, dead bees, etc, and it is acceptable to treat honey in this way without it being required to be labelled "filtered honey." However, where fine filters are used such that a significant amount of pollen is removed e.g. where honey is finely filtered to improve the shelf life and clarity, the product must be described as "filtered honey," and not simply "honey."

Where baker's honey and filtered honey are sold in bulk containers, the full product name must appear on both the container and on any accompanying trade documents. Baker's honey sold in its own right as a food must be accompanied by the words "intended for cooking only." (also see Bakers Honey below)

Can I use any other descriptions?

You must use the appropriate reserved description. These are defined in the Regulations. In addition, except for baker's and filtered honey, you may describe the honey with:-

- its floral or vegetable origin (provided it comes wholly or mainly from the indicated source and possesses the related organoleptic, physio-chemical and microscopic characteristics.)
- its regional, territorial, or topographical origin (provided it comes entirely from that source)
- its specific quality criteria.

You may use other appropriate and accurate descriptions or claims. However, some of these i.e. organic, or relating to health or nutritional properties are subject to specific additional rules and requirements. Separate advice is available regarding these requirements.

Can I add other ingredients to my honey?

Honey may be mixed with other foodstuffs. However such products are no longer 'specified honey products'. They will be subject to the general food composition and labelling requirements in the Food Labelling Regulations 1996. Any honey used as an ingredient of such a product must be a specified honey product. However the name used must clearly describe the product and ensure it cannot be confused with a product with a reserved description.

What is a durability indication?

This is the date up to and including which the honey can reasonably be expected to retain its specific compositional qualities if properly stored. (If storage is critical storage information must be given).

This will be in the format 'Best Before day month year' or for products with a shelf life of more than 3 months may be in the format 'Best Before End month year'.

It is recommended that the durability indication is sufficiently precise to identify individual batches. If it is not, an additional lot mark or batch code will be required (see below).

Why do I need a lot mark?

A lot mark is required to identify a particular batch of product and provide traceability. The durability indication (provided it includes at least a day and a month) may be sufficient if it identifies a particular batch. If not you will require an additional lot code. It is recommended that you put an L in front of a lot code so that it is clearly identified as such.

Honey sold only from the premises on which it was packed does not need to be lot marked. However, it is advisable to lot mark all jars anyway.

How do I label the origin of blended honey?

Blended honey of mixed origins may be labelled with all the countries concerned or this may be replaced with one of the following as appropriate:-

- blend of EC honeys
- blend of non-EC honeys
- blend of EC and non-EC honeys.

Are there any special provisions for Baker's Honey?

Yes. Baker's (& filtered) honey packed in bulk containers must be clearly individually labelled as such and this description must be used on any trade documents. Where baker's honey is used as an ingredient this description must be used in the ingredients list, although the term honey may be used in the name of the food. However, when used as an ingredient in a food, the reserved description 'bakers honey' can be replaced by 'honey', in the ingredients list, if the description Honey has not been used in the name of the food, or given other special emphasis,

What are the compositional requirements for honey?

In general when placed on the market for human consumption honey must not (except in the case of baker's honey)

- have any foreign tastes; or
- have begun to ferment or have fermented; or
- have been heated in such away that natural enzymes have been destroyed or significantly inactivated; or
- have an artificially changed acidity

Further no pollen may be removed except where unavoidable in the removal of foreign, inorganic or organic matter. General compositional requirements are listed in the following table. However there are also specific different requirements for some honeys to which floral and/or regional descriptions are applied and baker's honey.

Fructose & glucose combined <ul style="list-style-type: none">• Blossom honey• Honeydew honey and blends with blossom honey	Not less than 60g/100g Not less than 45 g/100g
Sucrose	Not more than 5g/100g
Moisture	Not more than 20%
Water insoluble content	Not more than 0.1g/100g
Electrical conductivity	Not more than 0.8mS/cm
Free Acid	Not more than 50 milli-equivalents acid per 1000g
(Most UK honey) <ul style="list-style-type: none">• Diastase Activity• HMF (hydroxymethylfurfural) after processing & blending	Not less than 8 Not more than 40 mg/kg

Are there any restrictions on the positioning of information on the label?

Yes. The reserved description, the durability indication (or information stating where it can be found) and the weight indication must be in the same field of vision.

What size jars can I use to pack honey?

Honey has traditionally been prepacked for retail sale only in prescribed quantities, however since April 2009 the requirement to use fixed quantities has been removed and honey may therefore be packed in any metric quantity of your choice.

Note individual portions of 25g or less are exempt from compulsory weight declarations

The imperial equivalents may also be shown. However the metric must be more prominent (i.e. larger, in bolder print, or if in equal typeface, come first). There is a minimum size for the weight indication, for most packs at least 4mm in height.

What quantity checks do I need to make?

Honey can be filled either to **Minimum Quantity** or to **Average Weight**. In either case the scale used must be one that has been tested and approved for trade use. A stamped/verified shop scale is ideal, (see our factsheet, **weighing equipment in use for trade**, for more information)

For **Minimum Quantity** each jar should contain (net) at least the declared weight. Each jar or container must be individually weighed.

For **Average Weight**, there are certain rules - The Packers Rules- which must be followed. These allow for some weights to be a limited amount below the weight shown on the jar, provided that average weight is equal to or above that weight

For small producers one of the easiest ways to comply with these rules is to fill each jar by eye or on a scale then check (and make a record of) the weights making sure that the weights are all at or above the weight declared. You must remember to take away the weight of the empty jar and lid (the tare weight) from the total (gross) weight to find the (net) contents weight. As the weight of glass jars can vary it is best to establish this tare weight by weighing 10 jars plus lids and then to use the weight of the heaviest.

If you find that the net weights of some of the jars are low, you will need to weigh every jar from that batch, and remove the ones that are low. You can then top up these jars and recheck them. If you need to do this you should record that you did so.

The records you make should include the time and date of weighing, the weights found (including the tare weight used) and the batch or durability indication declared on the label. These records should be kept for at least a year.

The number of jars you need to check will vary according to the size of the batch. For guidance, it is usually sufficient to check 3 out of batches of 50 jars or less, 5 for batches between 50 and 100, and 7 or 8 per 100 for larger batches.

Voluntary labelling

The British Importers and Packers Association (BHIPA) adhere to a voluntary labelling code whereby all honey on retail sale includes a warning statement that "honey should not be given to infants under 12 months of age." This is a precautionary measure against possible infant botulism which could potentially arise from the presence of Clostridium Botulinum spores in honey. This is not a statutory requirement.

This advice is designed to provide basic guidance to traders. It is **not** a complete or authoritative statement of the law. For further assistance on this or any other Trading Standards legislation, please contact your nearest office. A large print version is available.

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B/wei/105/005 June 2010