



European
Beekeeping
Association

Head office: Brdo pri Lukovici 8
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Brdo pri Lukovici, 4th May 2026

Dear Ms Yoncheva,

Please find attached our formal response to the concerns raised by F.E.E.D.M. regarding the statements made by the EBA representative.

Our submission sets out, in a structured and evidence-based manner, the factual and regulatory context underpinning those statements. It draws on the findings of the EU Coordinated Action “From the Hive,” relevant analytical data, and current limitations within the EU enforcement framework. It also clarifies our position on the legislative gap that continues to hinder effective action against honey adulteration.

We trust that this response adequately addresses the issues raised. We remain available to provide any further clarifications or supporting information, should this be required.

Yours sincerely,

President Boštjan Noc – President of European Beekeeping Association

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Dr. Nik Lupše –Head of EBA Scientific Committees

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Scientific Committee for Safety and Quality of Bee Products members:

Prof Dr Andreas Thrasyvolou

Dr Juraj Majtan

Prof Dr Dražen Lušič



Subject: Fraud is actively exploiting the lack of legally enforceable recognition of existing methods of analysis

Dear Ms Yoncheva,

Dr Nik Lupše, head of scientific committees, in his intervention, did not rely on general or unsubstantiated claims, but on documented evidence drawn from the EU Coordinated Research Action “*From the Hive*” (2023). This report clearly establishes that 70 out of 123 honey exporters (56.9%) exported to the EU honey adulterated with exogenous sugars (Fig. 3, Annex A). It further confirms that 63 out of 96 importers (65.6%) introduced such adulterated honey into the EU market and marketed it as authentic (Fig. 4, Annex B).

The samples analyzed within this EU initiative were collected by Border Control Posts (BCPs) and examined by the Joint Research Centre (JRC) in Geel using state-of-the-art analytical methods, including EA/LC-IRMS, HPAEC-PAD, LC-HRMS, and H-NMR. These methods unequivocally demonstrated non-compliance with EU legal requirements.

Nevertheless, these products were ultimately classified as “suspicious” rather than “adulterated” solely because the analytical methods used have not yet been formally validated for legal enforcement purposes. This classification does not reflect any scientific uncertainty, but rather a regulatory deficiency. The legislative framework is demonstrably lagging behind both the sophistication of adulteration practices and the capabilities of modern analytical science.

The situation can be summarized as follows:

Science establishes that the product behaves as adulterated; the law refrains from formally recognizing it as such; and fraudulent operators systematically exploit this discrepancy.

Accordingly, the core issue is not a lack of detection, but a lack of legally enforceable recognition of that detection. This constitutes the principal regulatory bottleneck in addressing honey fraud within the EU.

This gap is not theoretical; it is actively and systematically exploited. Products identified as non-compliant through advanced analytical techniques remain in circulation because the absence of legally recognized methods allows operators to challenge enforcement actions, delay proceedings, and ultimately avoid sanctions or product withdrawals.

As explicitly stated by the EBA representative: “We are caught in a cycle where fraudsters use advanced syrups and falsified origins to bypass controls, while authorities wait for validated methods admissible in court.”

In this context, it is particularly concerning that F.E.E.D.M. invokes arguments regarding legal enforceability that mirror those of operators engaged in fraudulent practices. Such positioning



risks reinforcing the very regulatory gap that facilitates the continued entry and distribution of adulterated honey within the EU market.

While we do not suggest that F.E.E.D.M. endorses fraudulent activity, it is untenable to imply that the market operates without systemic irregularities. Honey fraud within the EU is well-documented, organized, and persistent. It manifests through distorted pricing structures, consumer deception via misleading labeling, and significant disruption of fair market conditions.

Furthermore, the EBA representative presented substantiated data on production, consumption, export volumes, and trade balances in countries benefiting from preferential trade agreements with the EU, including Vietnam, Ukraine, and Argentina. These data indicate clear inconsistencies, with export volumes exceeding domestic production capacities, thereby confirming the role of certain countries as re-export or blending hubs. This evidence is supported by recent EU honey market analyses.

On this basis, the protest submitted by F.E.E.D.M. must be rejected as unfounded, overly general, and not supported by the available evidence. The EBA intervention was comprehensive, rigorously documented, and grounded in EU-wide research involving 16 Member States, as well as in established legislative and trade data.

Moreover, the detailed evidence requested by F.E.E.D.M.—including specific consignments, operators, analytical methodologies, competent authorities, and verifiable results—is, to a significant extent, already accessible through its own members who have been included participated in the “From the Hive” coordinated action. Additional data may also be obtained from the JRC upon formal request.

EBA will continue to advocate decisively for the adoption of harmonized and validated analytical methods that are legally admissible for enforcement purposes. Only through such measures can “suspicious” findings be formally recognized as “non-compliant” or “adulterated,” thereby closing the current enforcement gap and eliminating opportunities for its exploitation.

At the same time, it is imperative to establish full transparency and traceability across the honey supply chain, including the systematic disclosure of exporters, importers, consignment volumes, and batch identification.

The persistence of honey fraud in the EU is not due to insufficient scientific capability, but to regulatory inertia. Unless the EU aligns legal frameworks with existing analytical capacities, fraudulent practices will continue to evade effective enforcement, to the detriment of producers, consumers, and the integrity of the internal market.



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Thank you for your commitment to European agriculture and we look forward to hearing from you!

Respectfully,

President Boštjan Noc – President of European Beekeeping Association

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Dr. Nik Lupše –Head of EBA Scientific Committees

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