



Animal &
Plant Health
Agency

APHA Briefing Note 18/25

Clarification on honey and apiculture products and products containing honey to be exported to the EU and movement to Northern Ireland (NI) via the red lane

Date issued: 29 May 2025

Purpose

To inform OVs and FCCOs about the EU Commission's clarification on requirements for the export of honey and apiculture products and other Products of Animal Origin (POAO) containing honey, to EU and movement to NI via red lane.

Background

In September 2023, the European Commission amended Delegated Regulation [EU 2022/2292](#), requiring that honey and other apiculture products intended for human consumption imported into the EU, must be listed on TRACES. Consequently, honey and apiculture products originating from third countries may only be placed on the EU market if they are dispatched and obtained from, or prepared in, establishments that appear on lists drawn up and kept up to date in accordance with Article 127(3), point (e)(ii) and (iii), of Regulation (EU) [2017/625](#).

Establishments which produce honey and other apiculture products must be registered by their local authority under assimilated Regulation [852/2004](#). APHA National Control Point (NCP) hold an up-to-date list of honey and apiculture establishments, published on GOV.UK at [Businesses approved to export to the EU](#), which is also copied into TRACES.

Since this new requirement came into force, Defra has sought further clarification from the European Commission regarding the listing of establishments, the use of honey as an ingredient in various products, and the export of honey originating from EU Member States.

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Updates

- 1) The Commission Delegated Regulation 2023/2652 amending the Commission Delegated Regulation 2022/2292 was implemented to ensure that honey and other apicultural products intended for human consumption from third countries intended to be placed on the Union market comply with the rules on food, food safety, integrity and wholesomeness at all stages of production, processing and distribution of food, including rules aimed at ensuring fair practices in trade and protecting consumer interests.
- 2) Establishments that dispatch products with Harmonised System (HS) headings codes 0409, 0410, 1212, 1521 or 1702 are to be listed on the honey and apiculture products establishment list.
- 3) When honey is used as an ingredient in a meat product or dairy product and not put on the market directly as honey or an apiculture product, the meat or dairy manufacturing establishments are not required to be listed as honey and apiculture establishments. Therefore, a meat product or dairy product that is declared with two Combined Nomenclature (CN) codes, one of which is HS heading 0409, 0410, 1212, 1521 or 1702, is not required to be listed on the list of honey and apiculture establishments.
- 4) When honey is processed and included in a product, but the product is not classified as a composite product, a honey EHC is required. For example, yogurt with honey, when considered a 'mixed' or 'compound' product, both components are POAO, so dairy and honey certificates would be required.
- 5) When honey is used in a composite product, the food business operators must ensure that it complies with the requirements established in Article 6(4) of Regulation (EC) No 853/2004. For example, a cooked sauce that contains honey and vegetable ingredients qualifies as a composite product and therefore the honey used must originate from an establishment in compliance with the Article 6(4) of Regulation (EC) No 853/2004.
- 6) A composite product of GB origin, containing honey from an EU Member State, is authorised to be exported to the EU.

Further Information

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