

FSA Board Meeting - June 2022: Questions to the Board

Questions and answers to queries submitted to our Board ahead of the June 2022 meeting.

Questions for the FSA and pertaining to a paper on the meeting agenda were read out and answered at the [meeting on Wednesday 15 June 2022](#). A [recording of the meeting is available](#) on our YouTube channel. The written answers to those questions will appear on our website within [the minutes of the meeting](#), following ratification by the Board at September 2022's meeting.

Two questions were received which were not read out and answered at the meeting. The first did not pertain to a paper on the agenda and the second was received after the noon deadline of the day before the meeting.

Question 1 - UK Honey Regulations

Dear Secretary,

Would the board members wish to comment or amend the current UK honey regulations, given the world wide spread of honey fraud contaminated with non honey additives?

Thank you,
Martin Gilmore

Our response

Dear Mr Gilmore,

Thank you for contacting the Food Standards Agency.

While your question did not relate to a paper on the June FSA Board meeting agenda, here is our reply.

We received your enquiry on 6 June 2022 regarding whether the FSA Board wish to comment or amend the current UK honey regulations, given the worldwide spread of honey fraud contaminated with non-honey additives.

[The Honey \(England\) Regulations 2015](#) and comparable legislation for other nations within the UK set strict rules to protect this commodity, ensuring that all honey sold in the UK meets high minimum standards relating to its composition and labelling to guard against fraudulent practices. Defra is the responsible department for this legislation and for policy around food composition standards and labelling. There are no immediate plans for Defra to amend the Honey Regulations 2015. However, as the Government looks in the future to review retained EU law, to ensure they remain appropriate for the UK, it is envisaged that rules on honey will be reviewed over the longer term. Any changes to honey rules would be subject to a public consultation to gauge views on any proposed changes and subject to collective Government agreement.

Responsibility for assessing business compliance with the majority of food legislation rests with local authorities. They will consider any areas of non-compliance with food law and take appropriate enforcement action in line with a hierarchy, risk-based approach to ensure the business takes the necessary steps to achieve compliance. Each situation will be judged on its own merits by the relevant local authority to determine the proportionate course of action.

Honey is a natural but complex product. All honey on sale, regardless of where it has come from, needs to comply with the Honey (England) Regulations 2015. There is no information to suggest that honey on UK shelves is unsafe or widely adulterated.

For example, an EU-coordinated control plan on honey undertaken in 2015 found non-compliances regarding suspected sugar adulteration between 6% and 14%, depending on the testing method used. Indeed in comparison, levels of non-compliance on this theme for samples taken in the UK were very low at around 1%, from 147 samples. Under Europol's Operation OPSON in 2020/21, 495 checks were undertaken around honey authenticity in 15 EU member states, Scotland and the United States, across a variety of issues but particularly around sugar adulteration. 7% of products sampled were non-compliant but all of the small number of samples analysed in Scotland were found to be compliant.

While there is no evidence that any honey on sale in the UK is unsafe, it is a product that can be at risk of fraud. Products which declare a premium status, have a high price by weight, have complex supply chains or are subject to a spike in demand, can be particularly vulnerable to fraudsters. However, analysis can be challenging and no single test can definitively determine a honey's authenticity.

A range of different analytical methods are available, from the well-established traditional methods to more recently developed advanced 'fingerprinting' tools such as Nuclear Magnetic Resonance (NMR). Wherever possible any method used to determine honey authenticity should be internationally recognised and validated. We are working with the honey industry to ensure that honey is safe, authentic and what it says it is. We are also collaborating with partners across government to improve understanding and disseminate knowledge of honey testing methods and the honey supply chain. For instance, Defra and the FSA have been working with the UK Government Chemist, on standardising approaches for honey authenticity testing, exploring ways to provide additional assurance for testing methods such as NMR which rely on underpinning databases and working on guidance for applying a weight of evidence approach.

As always, consumers are at the heart of everything we do and we aim to maintain consumer confidence, reassure businesses involved in honey supply chains and reduce any risk of food fraud.

Question 2 - Household Food Insecurity

Dear Members of the Food Standards Agency Board,

I am writing to you ahead of tomorrow's board meeting in relation to your agenda item on Household Food Insecurity at 11.45am.

I am a Nutritionist for an NGO called First Steps Nutrition Trust. We have been around for 10 years and are a UK-focused, independent public health nutrition charity working in the early years. We work to influence policy and practice to better protect and promote good nutrition from pre-conception to five years. We do this by filling practical and policy-relevant information gaps and providing resources for health workers supporting eating well in the early years.

Having read the recent research by the Food Standards Agency, we believe there is a role for the Food Standards Agency in supporting community food providers to meet the specific needs of

infants and young children. Attached is a short briefing document that outlines why community food provision for infants and young children should be addressed and some recommendations as to how this may be achieved.

We look forward to hearing from you and would be happy to answer any questions you may have.

Kind regards,
Rachel Childs
Nutritionist
First Steps Nutrition Trust

Our response

Good morning,

Thank you for your question about supporting community food providers to meet the needs of infants and young children on 14 June. This is a very important issue impacting an increasing number of consumers, which is why the FSA is considering our role in how we can ensure that everyone continues to have access to safe food.

The FSA wants to ensure that all consumers can access food that is safe, whether their food comes from a shop, an online platform or a food bank. Whilst the FSA does not believe that food charities and banks are the answer to the growing issue of people struggling to afford food, the unfortunate reality is that increasing numbers of consumers are relying on them to put food on their tables. This issue cuts across the FSA's work, as rising food prices have consequences for consumers' behaviour, which could increase the risk of unsafe practices and unsafe or inauthentic food.

We are therefore working with industry and other major donors, and foodbank charities, to look at what more we can do together to ensure that those who need to use foodbanks don't have to also worry about whether their food is safe. For example, we will work with charities, to tailor resources for community food providers, to make them as easy to use as possible. We also want to work with industry, government and charitable bodies to examine and improve the regulatory landscape for foodbanks and donors. As part of our collaborative efforts across government, we are engaging with Office for Health Improvement and Disparities, who focus on addressing health disparities, especially on those groups and areas where health inequalities have the greatest effect. We are grateful to you for sharing your briefing document, which we will bear in mind as part of this work.

Thank you once again for submitting your question.