

European Professional Beekeeping Association,
Vor der Emmet 14, 34508 Willingen, Germany



Members of the European Parliament
Attn: MEPs concerned with the
Mercosur trade agreement

Bernhard Heuvel
President

Mercosur trade agreement - approval only with mandatory batch-related honey traceability

Dear Members of Parliament,

Sunday, 10th of January 2026

On behalf of the European Professional Beekeepers Association (EPBA), we are writing to you regarding the upcoming decision on the EU-Mercosur trade agreement. European professional beekeepers view the proposed expansion of honey imports in the agreement with the utmost concern. We urge the European Parliament to approve the agreement **only on the condition of mandatory, batch-based traceability for honey imports within the tariff quota**. Otherwise, the agreement would open the door to further honey fraud and cause serious harm to European beekeepers and consumers alike.

The indispensability of traceability:

Honey is among the most frequently adulterated foods worldwide. Recent investigations by the EU Joint Research Centre ("From the Hives" action 2021/22) revealed that **46% of imported honey samples did not meet purity criteria** and contained markers of foreign sugars. Imports from certain countries of origin, in particular, showed alarming irregularities (e.g., 74% of the samples tested from China were suspicious). Common fraudulent methods—such as diluting honey with cheap syrup—have become so sophisticated that they circumvent conventional tests. **Complete traceability of every batch, from the beehive to export**, is therefore essential to ensure honey's authenticity and effectively prevent fraud. Without this transparency, there is no reliable way to verify whether a product labeled "honey" is actually genuine honey or an artificial mixture.

Danger to consumers and European beekeeping:

Honey adulteration undermines consumer rights and trust in food products. Anyone buying a jar of honey is being deceived if it actually consists mostly of industrial sugars instead of honey. Adulterated honey may pose a health risks, and it undermines consumer confidence in labeling and the integrity of our food chain. Furthermore, honey fraud massively distorts the market to the detriment of honest beekeepers. Cheaply produced syrup mixtures can be offered at dumping prices – imported honey cost an average of only about € 2.17 per kg in 2021, while industrial sugar syrup is available for as little as €0.40–€0.60 per kg. This enormous price difference gives fraudsters an unfair advantage and drives down the price of genuine honey. In major EU producing countries, payout prices for honey fell by **50 %** between 2014 and 2016, largely due to massive influx of cheap imports. Many European professional beekeepers are facing ruin because of this distortion of competition. This is not just about livelihoods, but also about ecological services: every beekeeping operation that closes represents a loss of pollination, biodiversity, and regional economic activity. This is about more than just trade – it's about consumer protection and the survival of an industry that is essential to the ecosystem.

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Argentina as a Precedent – Traceability is Feasible:

Argentina, one of Mercosur's largest honey suppliers, serves as an example of how batch-based traceability can be implemented practically and successfully. **Since 2003**, the Argentine authority SENASA has mandated, through Resolution No. 186/2003, **complete traceability of honey production from beekeeper to export**. Every exported batch must be uniquely traceable via the national IT system SITA. Only companies registered and inspected by SENASA are permitted to bottle honey for export.

The European Union effectively requires such standards: According to Delegated Regulation (EU) 2023/2652, from the end of 2024 onwards, only honey shipments from third countries originating from **officially listed and monitored** companies may be imported into the EU. This ensures that exporting countries maintain a functioning control system. The Argentinian traceability requirement – with batch-specific documentation of origin, beekeeper registration, production quantities, etc. – fulfills

precisely these requirements and demonstrates that Mercosur countries are indeed capable of ensuring transparent supply chains in the honey sector. This proven model must now be transferred to the Mercosur agreement.

Implementation without treaty amendment:

Crucially, the required traceability regulation does **not necessitate any changes to the agreement text** but can be incorporated into the implementation process. The European Parliament can make its approval conditional on the European Commission ensuring, through appropriate implementing acts, that **the use of the duty-free honey quota is contingent upon proof of batch-specific traceability**. Specifically, this could mean that every honey shipment Honey imported under the Mercosur quota must be accompanied by a certificate of origin and production batches issued by the relevant authorities of the exporting country, and this data must be verifiable via EU IT systems (such as TRACES). Such administrative requirements fall within the usual scope of agreement implementation and can be introduced unilaterally by the EU without renegotiating the agreement itself. This gives the EU the opportunity to establish **clear barriers against honey fraud within the framework of the settlement provisions**, without offending its Mercosur partners – honest suppliers would have nothing to fear, while fraudsters would be excluded.

No traceability, no approval:

The European Parliament has already called for the protection of beekeeping and honey quality in previous initiatives. In a 2018 resolution, MEPs demanded that imported honey must meet high EU standards and that **traceability requirements be tightened**. Furthermore, honey should be classified as a "sensitive product" in trade agreements and, if necessary, excluded from their scope. Against this backdrop, we urge you to remain true to this principle. Approving the Mercosur agreement without an effective traceability requirement for honey would betray these fundamental European principles. It would allow massive quantities of counterfeit honey to continue flooding the EU single market under the guise of free trade – to the detriment of consumers and honest producers. This would be in clear contradiction to key EU policy objectives (from the Green Deal and Farm to Fork to the Biodiversity Strategy), which aim for sustainability, consumer protection, and fair competition. **Trade policy must not mean sacrificing market integrity and food safety.**

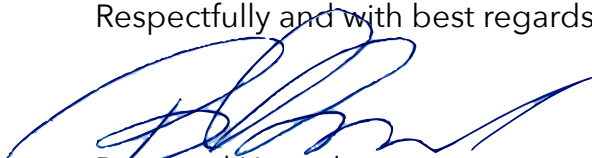
The EPBA therefore strongly urges you **not to approve the Mercosur agreement until it is guaranteed that honey shipments under the agreement are fully traceable**. In plain terms: Without a traceability requirement, there can be no green light.

This position is neither protectionist nor disproportionate – it is necessary to maintain a *functioning and legitimate honey market*. European beekeepers are committed to fair competition, provided it is based on a level playing field. Batch-based traceability for imported honey creates this level playing field by ensuring that imported goods are genuine and inspected. However, should an effective control system fail to be established, we believe that an import ban or the suspension of honey tariff concessions would be necessary – because market access without rules would be disastrous.

Dear Members of Parliament, you have the power to draw a clear line here: no duty-free honey quota without genuine traceability and authenticity checks. We are counting on your support to protect European consumers from deception and to preserve sustainable beekeeping in Europe. Please do not hesitate to contact us if you have any questions or require further information.

A comprehensive overview of the key arguments is included in the attachment.

Respectfully and with best regards



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OVERVIEW OF THE KEY ARGUMENTS

Demand: The EU must only approve the Mercosur agreement if mandatory batch-based traceability is introduced for the honey tariff quota. INTA and AGRI MEPs should insist on this condition before the European Parliament gives its approval.

I. Background - Honey adulteration in figures

Honey is one of the most frequently adulterated food products worldwide. According to EU investigations, **46% of the imported samples tested** in 2021/22 were suspicious and contained markers of foreign sugars. This figure has more than tripled since the last EU-wide test (2015-17: 14% irregularities). The main culprit is cheap sugar syrups used to dilute "honey"—developed to circumvent standard laboratory tests. China exemplifies the problem (over 100,000 tons of honey were imported into the EU in 2015, often adulterated with corn or cane sugar).

Conclusion: Without effective countermeasures, pseudo-honey is flooding the EU market.

II. A threat to beekeepers and consumers

Adulterated, cheap "honey" is displacing genuine, high-quality products. Imported honey is, on average, less than half the price of EU honey - a price only possible by diluting it with cheap syrup. As a result, producer prices in European beekeeping countries have already plummeted by around 50%. European beekeepers often operate below cost and are forced to give up. For consumers, this fraud represents **systematic deception**: what is labeled as honey sometimes isn't. This undermines trust in food and damages the reputation of a natural product. EU food safety monitoring is also rendered meaningless if contaminated or adulterated honey goes undetected.

In short: Without intervention, both consumers and honest producers loose out.

III. Traceability - the key to the solution

Seamless traceability of every honey batch from the beekeeper to the store shelf is the most effective tool against honey fraud. This is the only way to verify the origin of every drop of honey and the quantity produced. Discrepancies - such as exporting more "honey" than can be produced by the registered hives - immediately

expose fraud. Traceability creates transparency: Every imported batch must be verifiably assigned to a beekeeping operation with a specific production quantity. Without this network of information, fraud is virtually impossible to uncover. **The requirement for batch-specific traceability is therefore not a bureaucratic exercise, but essential to guarantee authenticity.** Even the EU Commission has recognized the need for better monitoring of honey imports and, from the end of 2024, will only permit shipments from listed third-country operations. Now, it is crucial to go even further and **document the origin of every single batch.**

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IV. Practical example: Argentina

The Mercosur member state of Argentina demonstrates that it is feasible. **Since 2003**, Argentina has legally mandated full honey traceability. Every honey export is processed through registered beekeepers and recognized collection points; all batches are recorded in the **"Sistema de Trazabilidad Apícola (SITA)"** (Apicultural Traceability System). This system ensures that Argentine honey can be traced back to the beekeeper – a prerequisite for supplying demanding import markets like the EU. In other words, **what we are demanding is already being successfully practiced in Argentina.** Therefore, there is no objective reason why a comparable requirement should not also apply to the Mercosur agreement. Traceability is neither technically utopian nor a trade barrier, but rather standard practice for reputable exporters.

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V. Legal Framework – Implementation without Amending the Agreement

It is important to emphasise that introducing a traceability requirement for the honey quota does not necessitate renegotiating the Mercosur agreement. As part of its internal implementation, the EU can stipulate that the tariff quota may only be used under certain conditions. Such conditions can be established through **implementing acts** or a regulation governing quota management. For example, it could be stipulated that import licenses for duty-free honey are only granted if a valid traceability certificate exists for the batch in question. This would allow the EU **to exercise its legitimate right to link import quotas to quality and control criteria** without altering the international law aspects of the agreement. This approach is comparable to administrative requirements in other sectors (e.g., organic certifications, proof of origin, etc.) and is therefore legally and diplomatically permissible.

Strategic Arguments

The requirement for honey traceability in the Mercosur agreement is well-founded politically and strategically:

- (1) Protection of sensitive sectors: The European Parliament has repeatedly emphasised that beekeeping, as a sensitive sector, deserves special protection. Such a requirement demonstrates that the EU takes these words seriously.
- (2) Coherence with EU objectives: Unregulated honey imports undermine the European Green Deal and the Farm to Fork Strategy, as they disadvantage sustainable domestic production. Traceability, on the other hand, promotes fair competition and quality – key EU objectives.
- (3) Precedent for future agreements: Enforcing quality standards in trade agreements sends a signal that **market access to the EU must not come at the expense of consumers and producers**. In the long term, this also strengthens public acceptance of free trade.
- (4) Fraud prevention: A robust and enforceable traceability system prevents illegal goods from entering duty-free circulation via third countries or mixtures. This would close a current loophole (e.g., relabelling Chinese honey via other countries).

In short: **Without complete traceability, expanding honey import quotas makes neither economic nor ethical sense.**

A clear message to the negotiating partners

The demand **"No duty-free honey imports without traceability"** should be communicated unequivocally. This means, in effect, that **duty-free quotas will only be implemented once the origin of every honey batch is guaranteed to be traceable**. This conditionality ensures that free trade and market integrity go hand in hand. Should it turn out that effective controls cannot be guaranteed, the consequence must be to suspend the honey tariff concessions before irreparable damage occurs. **Conversely, only the obligation of traceability creates the basis for agreeing to the agreement in the first place**. This position must be represented unanimously in the Committee on International Trade (INTA) and the Committee on Agriculture and Rural Development (AGRI).

Bottom line

No traceability, no Mercosur honey!

This must be the European Parliament's negotiating principle. Europe's honey industry is counting on the support of the Members of Parliament to effectively prevent fraud and ensure fair trade. Only with binding proof of origin can it be ensured that the Mercosur agreement offers **opportunities for all**, instead of being detrimental to European beekeeping. Therefore, please advocate for this traceability clause to be enshrined as a *conditio sine qua non* in the implementation of the agreement.

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