International Workshop

on the consequences of the ECJ judgement on GM pollen in honey for GM crop releases and cultivation in Germany and the EU

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Session 1: General Issues
The German and European Honey Market Implications of the ECJ judgement

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World Honey Production and Trade

World Honey Market 2009

- Production: 1,535,194 metric tons
- Exports: 364,484 metric tons
- Imports: 397,442 metric tons

Source: FAO
TOP Honey Producing Countries

Source: FAO
Honey Exports 2009

Source: FAO
Honey Imports 2009

Source: FAO
Main Honey Import Markets

Source: FAO, for Year 2009
# EU Honey Market

<table>
<thead>
<tr>
<th>Year</th>
<th>Usable Production (1000 t)</th>
<th>Imports (1000 t)</th>
<th>Exports (1000 t)</th>
<th>Population (million)</th>
<th>Consumption (1000 t)</th>
<th>Consumption (kg/head)</th>
<th>Self-Sufficiency (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>200</td>
<td>142</td>
<td>10</td>
<td>495</td>
<td>332</td>
<td>0.6</td>
<td>60.2</td>
</tr>
<tr>
<td>2009</td>
<td>203</td>
<td>137</td>
<td>9</td>
<td>499</td>
<td>331</td>
<td>0.6</td>
<td>61.3</td>
</tr>
<tr>
<td>2010</td>
<td>224</td>
<td>148</td>
<td>11</td>
<td>501</td>
<td>361</td>
<td>0.7</td>
<td>62.0</td>
</tr>
</tbody>
</table>

Source: EU Commission DG AGRI C4
# Import of Honey into EU

**IMPORT of Honey into EU**

<table>
<thead>
<tr>
<th>Origins</th>
<th>2008 tonnes</th>
<th>2009 tonnes</th>
<th>2010 tonnes</th>
<th>% change</th>
</tr>
</thead>
<tbody>
<tr>
<td>China</td>
<td>24,635</td>
<td>32,623</td>
<td>50,116</td>
<td>17%</td>
</tr>
<tr>
<td>Argentina</td>
<td>51,476</td>
<td>38,665</td>
<td>32,581</td>
<td>36%</td>
</tr>
<tr>
<td>Mexico</td>
<td>22,250</td>
<td>18,420</td>
<td>18,226</td>
<td>16%</td>
</tr>
<tr>
<td>Chile</td>
<td>9,158</td>
<td>9,578</td>
<td>9,226</td>
<td>6%</td>
</tr>
<tr>
<td>Brazil</td>
<td>1,701</td>
<td>7,014</td>
<td>8,247</td>
<td>1%</td>
</tr>
<tr>
<td>Uruguay</td>
<td>8,382</td>
<td>5,916</td>
<td>6,998</td>
<td>6%</td>
</tr>
<tr>
<td>Cuba</td>
<td>5,283</td>
<td>2,771</td>
<td>3,766</td>
<td>4%</td>
</tr>
<tr>
<td>India</td>
<td>5,225</td>
<td>4,289</td>
<td>3,376</td>
<td>4%</td>
</tr>
<tr>
<td>Other</td>
<td>14,197</td>
<td>18,064</td>
<td>16,245</td>
<td>10%</td>
</tr>
<tr>
<td><strong>EXTRA EU-27</strong></td>
<td><strong>142,306</strong></td>
<td><strong>137,338</strong></td>
<td><strong>148,780</strong></td>
<td><strong>-3%</strong></td>
</tr>
</tbody>
</table>

**January - September**

<table>
<thead>
<tr>
<th></th>
<th>2010 tonnes</th>
<th>2011 tonnes</th>
<th>% change</th>
</tr>
</thead>
<tbody>
<tr>
<td>China</td>
<td>30,631</td>
<td>35,702</td>
<td>+17%</td>
</tr>
<tr>
<td>Argentina</td>
<td>21,961</td>
<td>20,261</td>
<td>-8%</td>
</tr>
<tr>
<td>Mexico</td>
<td>11,250</td>
<td>8,779</td>
<td>-22%</td>
</tr>
<tr>
<td>Chile</td>
<td>6,879</td>
<td>6,644</td>
<td>-3%</td>
</tr>
<tr>
<td>Brazil</td>
<td>5,176</td>
<td>4,208</td>
<td>-19%</td>
</tr>
<tr>
<td>Uruguay</td>
<td>4,408</td>
<td>5,643</td>
<td>+28%</td>
</tr>
<tr>
<td>Cuba</td>
<td>2,832</td>
<td>2,329</td>
<td>-18%</td>
</tr>
<tr>
<td>India</td>
<td>2,489</td>
<td>677</td>
<td>-73%</td>
</tr>
<tr>
<td>Other</td>
<td>9,821</td>
<td>12,364</td>
<td>+26%</td>
</tr>
<tr>
<td><strong>EXTRA EU-27</strong></td>
<td><strong>95,446</strong></td>
<td><strong>96,607</strong></td>
<td><strong>+1.2%</strong></td>
</tr>
</tbody>
</table>

Source: EU Commission  
DG AGRI C4
German Honey Market

- Honey is used as table honey and as ingredient for other foodstuff
- Domestic Honey
  - Only covers 20% of the total demand
  - Is mainly sold directly from beekeepers to consumers
- Imported Honey
  - Covers 80% of total demand
  - Mainly sold in supermarkets
## Honey imports into Germany

<table>
<thead>
<tr>
<th>German Honey Imports</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>Share 2010</th>
<th>2011 Jan-Sep</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU Member States</td>
<td>10.984</td>
<td>22.068</td>
<td>19.442</td>
<td>18.428</td>
<td>21.346</td>
<td>23.8%</td>
<td>11.920</td>
</tr>
<tr>
<td>Chile</td>
<td>5.288</td>
<td>5.564</td>
<td>7.065</td>
<td>7.373</td>
<td>7.421</td>
<td>8.3%</td>
<td>5.061</td>
</tr>
<tr>
<td>Uruguay</td>
<td>6.740</td>
<td>9.589</td>
<td>7.696</td>
<td>5.270</td>
<td>4.907</td>
<td>5.5%</td>
<td>3.667</td>
</tr>
<tr>
<td>Brazil</td>
<td>4.224</td>
<td>483</td>
<td>1.351</td>
<td>4.144</td>
<td>4.869</td>
<td>5.4%</td>
<td>2.598</td>
</tr>
<tr>
<td><strong>Total Import</strong></td>
<td><strong>88.442</strong></td>
<td><strong>95.320</strong></td>
<td><strong>92.947</strong></td>
<td><strong>83.983</strong></td>
<td><strong>89.551</strong></td>
<td><strong>55.620</strong></td>
<td></td>
</tr>
</tbody>
</table>

Source: Statistisches Bundesamt

ECJ judgement - Main Changes for Honey trade

- Pollen as an ingredient
  - Honey experts disagree
  - Conflict to Honey Regulation EC 2001/110
  - What should be the ingredient?
    - Total pollen in honey or any individual pollen?
    - Conventional pollen or only pollen from GM plants?

- Honey falls under GMO regulations
  - Pollen from GM plants need to have authorization
  - Three categories of Honey
    - Honey without pollen from GM plants
    - Honey with pollen from GM plants but with authorization in the EU
    - Honey with pollen from GM plants but without or without sufficient authorization in the EU
Immediate Reactions to the ECJ Judgement

- Media
- Supermarkets
- Food processing industry
- Importers and Packers
- Beekeepers
- Authorities
- Consumers
Media - Press releases

- Honey out of the supermarkets?
- Do all Honeys contain GMO?
- Consumers cannot chose on GM?
- Honey in doubt!
Supermarkets

- Tried to prepare for ECJ publication
- Made Analyses of Honey
- Pro-active withdrawals of Canadian Honey
- Request for certifications /GMO analyses for Honey
- High attention on further development of the ruling on GM in Honey
- Fear of bad publicity
Food Processing Industry

- With GM in Honey, they see their own products in danger
- No confidence in authorities
- Asking for GMO free Honey
- Analysis on GMO
- Want guarantee of full compliance with legal requirements
- Reduced usage of Honey
Importers and Packers

- Analysis for GMO on honey in warehouses
- Require Analysis from Suppliers/Producers
- Reduce production and stocks
- Might have Honey which is not marketable
- Left with legal uncertainty as ruling of ECJ judgement was not clear
- Continue to pack Honey on current GM analysis
Beekeepers

- In Germany – celebrate ECJ judgement
- In Europe – mixed reactions
- Third Countries – no understanding, disappointment
Authorities – only a German issue?

- EU member states
  - Hardly any reaction, as clear ruling from EU commission has been missing

- Germany
  - Sampling and analyses of honey on imports, warehouses of importers and packers, supermarkets, industrial customers
  - Recalls of honey
  - Increased sampling on rapid alert information

- Third Countries
  - Concerned about beekeeping sector
  - Contact to EU Commission
Consumers

- Difficult to measure the reaction up to now
- Miss some honeys which had to be taken out of the market (Canadian Honey)
- Do not understand the complex issue
- Want labelling?
Commercial Impact of ECJ Judgement

- Costs
- Risk
- Uncertainty

Will sum up in
  - higher prices,
  - less diversity,
  - lower consumption,
  - lower production
Costs

- High costs for analyses
- Costs for recalls of honey
- Destruction of honey and packing material
- Change of labels
- Reduced sales volume – table honey and industrial honey
- Shortage of suitable honeys for EU
- Higher prices
- Unfair competition due to different action from authorities
- Exporters try to change destination of their honey
- Beekeepers have only limited options to sell their honey
- Loss of long term business relations
Risks

- Consumers wish to have GMO free honey
- Customers wish to have at least no labelling for GMO
- GMO cultivation worldwide might continue to grow
- Number of non authorized plants in EU might increase
- Complex GM analyses, high errors
- High risk as harmonised control methods have not been fixed
- Less chance of diversification of honey
- Change of honey blends and characteristics of blends
- Consumer will not find honeys with typical characteristics
- Limited options for finance from banks or investors for “high risk” product
- Threat to the existence of importers, packers and beekeepers
- Reduction of number of beekeepers and beehives
- Less bee-populations for pollination
Uncertainty

- Is honey safe?
- Is there full legal security?
- GMO authorization in the EU is time limited. What will happen to the honey after authorization ends?
- Honey companies have no influence on GMO authorization process in the EU
- Classification of supplying countries according to GMO risk
- Selections of honeys according to GMO risk
Conclusions

- Consumers feel confused
- Customers feel unsafe
- Traders and producers feel unsafe
- Legal status of product is uncertain
- Honey suffers from loss of image
- Honey is (mis-)used for political discussions about GMO
Solutions

- Honey is different from other products and cannot be seen as any other GM product
- Beekeepers need political support for their socio-economic importance
- Pollen of GMO plants in Honey should generally be authorized as Pollen are not GMO
- Pollen should not be considered an ingredient (they are not)
- Threshold for non-authorized GM pollen
- Honey should be exempted from EU GMO regulations