

Selling Honey for Small Scale Producers

by Colin Goodwin, South Gippsland Beekeepers Inc.

The majority of our club members are small scale beekeepers with 2-5 hives, who are content to harvest some honey each year for their own use.

However when there's a good year I sometimes wonder if I could package and sell some of our surplus.

I did some research and here's what I found after searching on the Internet, and talking to the various shire environmental health officers around our region.

“Honey and comb honey are food items. Beekeepers who want to sell these items should first contact their local government public health unit about the legal requirements for extracting and packaging premises, labels for honey containers, record keeping and compliance with food safety laws.”

(from “Australian Beekeeping Guide”, 2014 Rural Industries Research and Development Corporation)

Legal Requirements for Extracting & Packaging Premises

All the shire health officers I spoke with treat honey processing as a “class 3 food business”. (see http://www.health.vic.gov.au/foodsafety/foodclass/class_list.htm)

Basically a class 3 premise handles unpackaged low-risk foods, whereas a retail outlet which handles pre-packaged low-risk foods (e.g. a food stall selling your pre-packaged honey would be a class 4 premise).

“Class 3 food premises are those whose main activities involve the sale of foods not commonly associated with food poisoning. This includes the supply or handling of unpackaged low risk foods, or sale of pre-packaged potentially hazardous foods which simply need refrigeration to keep them safe. Premises expected to fall into class 3 include milk bars, convenience stores, fruit stalls selling cut fruit and wholesalers distributing pre-packaged foods.”

“As a class 3 your food premises must:

- ensure that food that is sold or prepared for sale is safe to eat
- retain annual registration with your council
- be inspected by the council when initially registered, or on transfer of the food premises to a new proprietor, and annually thereafter as part of the registration renewal process
- keep completed minimum records about your food handling practices on site at your food premises .”

(from Making food safety your business. Information for class 3 food premises - July 2010)

“Given the lower risks associated with these activities, class 3 food premises are not required by law to have a food safety program or a food safety supervisor. They

must keep a small number of easy-to-complete “minimum records”. These are available from your council or the Department of Health website at <http://www.health.vic.gov.au/foodsafety/bus/class.htm#class3>

These days your honey processing facility (where you extract, strain/filter, and package honey) does not require a commercial kitchen. A clean vermin-proof shed, with facilities for cleaning equipment (double sink), sterilising containers (e.g. dishwasher or oven), and personal hygiene (hand wash basin) would probably be satisfactory. (But check with the local health officer first!)

Each shire sets its own rates for initial and annual registrations (which require initial and annual inspections by a Shire Health officer.

(These were the rates when I checked in August 2015; but they do vary from year to year.)

Shire	Initial Review & Inspection	Annual Registration & Inspection
Wellington	\$0.00	\$105.00
Baw Baw	\$0.00	\$200.00
Latrobe	\$328.00	\$256.30
Bass Coast	\$0.00	\$279.00
South Gippsland	\$101.00	\$431.00

(Note: Honey levy - At the time of writing, beekeepers who sell more than 600 kg of honey in a calendar year were liable to pay a levy to the Australian Department of Agriculture. Further information may be found at: www.daff.gov.au/levies or levies.management@daff.gov.au .)

As an observation, these registration costs are much greater than any profits I could hope to make selling my tiny quantities of honey. For very small producers it may be more practical to take honey to a larger producer and use their premises for extraction and packaging for a fee or a portion of the product. Such arrangements are quite common in the wine and olive industries.

Packaging and Labelling

The Australia New Zealand Food Standards Code, Standard 2.8.2, Honey states: *Honey means the natural sweet substance produced by honey bees from the nectar of blossoms or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which honey bees collect, transform and combine with specific substances of their own, store and leave in the honey comb to ripen and mature. In relation to the composition of honey, the Code states Honey must contain no less than 60% reducing sugars and no more than 21% moisture.*

In other words, to meet the code the honey on your frames should be mostly capped (and therefore de-hydrated or “ripened” by your bees). This also means that your honey won’t ferment and will have a long shelf-life.

“The composition of honey varies from one floral source to another. The average composition of Australian honey produced from native and exotic plants is: water 15.6%, fructose 42.5%, glucose 30.6%, sucrose 2.9%, minerals 0.16% and other constituents 8.24%.”

“Honey is a natural food. Every effort must be made to maintain its natural qualities during processing and storage and to ensure it has a long shelf-life. It should receive minimum heat treatment. Granulation is minimised by removing sugar crystals, pollen, dust, wax particles and other debris from the honey. ... Honey may be heated to approximately 35–45 °C to lower its viscosity. The honey is then filtered and packaged. Heating honey above 45°C will not improve its ability to flow through strainers and lines in extracting and packing facilities.

If honey has to be heated, place the container of honey in a heated water bath or in an environment with circulating hot air. Direct heat, such as a gas flame, or electric hot plate, should never be applied to a container of honey because the product will be ruined. The honey can be filtered through one or more fine mesh strainers before being placed directly into a settling tank. Once the honey has settled, usually after 24 to 48 hours, it can be packaged.”

“Glass jars and food grade plastic tubs and pails, usually up to five kilogram capacity, are used as retail packs. ... Clear containers allow the customers to see the product.” Only new containers are permitted to be used.

(from “Australian Beekeeping Guide”, 2014 Rural Industries Research and Development Corporation)

So long as you are packaging only raw honey, without other additions (e.g. herbs, flowers, flavourings), then the labelling requirements are fairly basic.

Food labels state:

1. The name of the food

Packaged food must be labelled with a name or description that will not mislead consumers. “Honey” is a prescribed name and that name must appear on the label. (e.g. South Gippsland Honey”)

For small producers who are able to collect honey from different flora (e.g. “Tea Tree”) or regions (“Mardan”) it would be practical to manually write these details on pre-printed labels rather than having special print runs for labels.

2. Weight of Contents

(e.g. “500g”)

3. Ingredients

With some exceptions food labels must include a statement of ingredients (the term ingredient includes additives). However as “honey” is a prescribed name, this word must be used on the label and no further breakdown is required.

(e.g. “Ingredients: Raw cold-extracted honey”)

4. Nutrition information panel

Generally, all packaged food labels must include a nutrition information panel.

Typical Nutrition Information Panels state the package weight, and serving size, and then list the amount of Energy, Protein, Fat (total, saturated), Carbohydrate (sugars), and Sodium per serving, and per 100g.

5. Premises Identification

For food recall and contact purposes the label must include the name and business address in Australia of the manufacturer, packer, vendor or importer of the food. A full business address is required, including the street number, street name, town or suburb and state. A post office box or similar postal address is not sufficient.

(e.g. “Beeman Honey, 37 Argyle St., Leongatha VIC”)

6. Country of origin

A label must include a separate statement identifying the country of origin of the food. “Product of”, “Produced in” and similar terms mean that the origin of each significant ingredient is from the country identified and all or virtually all the processes of production or manufacture were done in that country.

(e.g. “Product of Australia”)

7. Lot/Batch Identification

For food recall food labels must contain information identifying the lot/batch and premises where the food was packed or prepared). The lot/batch usually refers to food prepared or packed within a period not exceeding 24 hours.(e.g. “Batch 12, 2015”)

For very small producers it would be practical to manually write these details on pre-printed labels rather than having special print runs for labels.

8. Date mark

Generally, all packaged food with a life of 2 years or less must show a date-mark. While this would be optional for honey, some health officers suggested the use of a Best Before date.

When using a “Best Before” date the date must consist of at least the month and year for products with a shelf life of greater than three months, expressed in that order (e.g. Dec 2015 or 12 2015).

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9. Other Advice

Some beekeepers provide information to their customers about the granulation of honey and how to liquefy it should it set hard. It is important to point out that granulation or candying of honey is a natural process, and that the quality of the product is not affected at all, nor has it gone bad. Candied honey may be reliquefied by placing the container in a hot water bath at preferably 35 °C but certainly no more than 45 °C.

(e.g. “Natural honey may crystallise and can be re-liquified by placing the container in warm water.”)

10. Health claims (nutrition, health and related claims)

Health claims (nutrition, health and related claims) are voluntary statements that may be made by food businesses on food labels (and in advertising).

However, as per the Code the following health claims are prohibited:

- claims that are therapeutic in nature;
- claims that compare vitamin or mineral content;
- nutrition content claims that imply slimming effects;
- claims about use for infants (note: Honey used as infant food must be sterilised.)

(from: Guide to the Labelling of Packaged Food, For retail sale”, August 2013)

Record Keeping and Training

Honey Processors must keep a small number of “minimum records”. These are available from your council or the Department of Health website .

For honey processing, the record-keeping is basically around production activities (e.g. Batch records – processing date and quantity prepared, product name and batch numbers and best before date as shown on label, details of where product was sold.), and any specific activities required to maintain the health and safety of the premises (e.g. pest control).

There is no legal requirement for any person in a food business to attend a training course. However to make sure that food handlers have the skills and the knowledge of food safety and food hygiene for the work they do, options include:

- formal training with a Food Handling Course,
- completing “Dofoodsafely”, the Department of Health’s free online learning program for food handlers at <http://dofoodsafely.health.vic.gov.au>

Conclusion

All of the Council Health officers I spoke with were very willing to provide help and advice. While this little document attempts to covers the basics, should you decide to package and sell your honey, do check with your local officer early in the process. Laws do change, and there are local variants and interpretations in how the laws are applied.