

Towards an Organic Honey Standard

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At present in the US, there is no national organic honey standard---or you could say, there are many. Jars of honey are sold everywhere with the "USDA ORGANIC" label. If you read the fine print, they are nearly all from Latin America, or Canada, or elsewhere. They were not produced to a USDA standard because there is none. (Although there is a draft proposal from the National Organic Standards Board that has been around for years. More about that later.)

USDA has a policy of Equivalence which allows products from other countries to enter the US labeled "organic" , if USDA considers their overall system of certification to be "equivalent" to what we have in the US. Of course, equivalence to a non-existent honey standard is fairly easy---almost anything will do. And presto! the USDA ORGANIC seal appears on your honey, so long as you can find a certifier to approve it. Any of the 120 accredited certifiers will do, whether they have any apiary expertise or not. And very few have it.

USDA's National Organic Program (NOP) is based on the theory that the organic label is a marketing tool which represents a system of production, not a claim about the product. For

this reason, USDA has not implemented Congress' requirement (at 6506 (a) (6) of the Organic Foods Production Act of 1990) that the NOP

"require periodic residue testing by certifying agents of agricultural products that have been produced on certified organic farms and handled through certified organic handling operations to determine whether such products contain any pesticide or other nonorganic residue...."

Organic bigwigs have convinced themselves and USDA that organic farming is really about resource conservation (whatever that means) and environmental protection. Even though the USDA regulation guarantees public access to results of residue testing, such testing is not being done because certifiers would have to pay for it themselves (7 CFR 205.670(b)).

And why should they look for trouble and alienate their clients?

If you think about a credible organic honey label, I believe you will conclude that regular residue testing must be a part of it. Synthetic apiary chemicals and environmental pollution are the main groups to be watched.

At once, it is clear that such testing would be too expensive for small beekeepers, or even for most larger ones. So the program needs to be run by a public agency. I understand the National Honey Board recently spent \$30,000, or some such, for pesticide residue tests at the University of Pennsylvania on wax and pollen (non-organic)----and found fluvalinate

and coumaphos above the legal limit. They did not ask for honey to be tested.

So, in addition to some program of routine residue testing, what else does organic honey require?

- 1) Foraging limits suited to the locality. A foraging standard appropriate for Montana would make organic beekeeping in Delaware impossible. So each state apiarist, or state organic certifier, or state ag commissioner, would define the pollution threats within their borders, from conventional apiaries, conventional agriculture, and residential hotspots. Then a reasonable radius for organic hives would achieve an estimated level of purity appropriate for that state, but in no case less than 5% of the UREC of EPA and FDA tolerances. (See UREC defined and described at 7 CFR 205.2 and 205.670-671.--- Unavoidable Residual Environmental Contamination).**

We need to be clear that organic honey has the lowest achievable level of contamination, not complete purity. It will be objected that consumers may be alarmed about a 5% UREC. True, but part of organic farming is educating the public about what is really going on, and that includes a comparison of organic honey with conventional.

- 2) No synthetic apiary treatments, although there will be some natural treatments which get approved by the NOSB and added by USDA to the National List.**
- 3) Migratory beekeeping not OK>**

- 4) **Organic wax and pollen not OK until we have developed experience with honey.**

No doubt there will be other issues. It is important to give our attention to these matters, or else a national standard will simply be imposed by USDA because few beekeepers are paying attention. Although organic food standards have been, and will be, degraded through the influence of mega-corporations, there is no such concentration of wealth in the honey industry. So we have a good chance of advocating a sound organic standard and getting it into the regulations.