

## Florida Honey Labeling Regulations<sup>1</sup>

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Nothing is perhaps more confusing to the honey processor or consumer than honey labeling. This is because a U.S. code of honey labeling does not exist, and many terms used on honey labels convey little if any meaning. Examples of such wording include: natural, organic, raw and old-fashioned.

A new nutritional labeling law was recently passed by the U.S. Congress. Outfits doing less than \$500,000.00 per year gross sales are exempt from nutritional labeling requirements at the present time. And those exceeding the gross sales figure, but doing less than \$50,000.00 in food sales are also exempt. Any business requesting exemption must submit the following information to the FDA: 1. Name and address of business.

2. Name of food product for which exemption is claimed.

3. Average number of full-time equivalent employees from May 8, 1993 to May 7, 1994.

4. Approximate total number of units sold in the U.S. between May 8, 1993 and May 7, 1994.

5. Signature of responsible party; also stating that the person signing will notify the Office of Food Labeling when the product no longer qualifies for exemption.

Send the above to Office of Food Labeling (HSF-150), Center for Food Safety and Applied Nutrition, Food and Drug Administration, 200 C St. SW, Washington, DC 20204. Questions about this should be directed to Jerad McCowin, special assistant to the director, ph. 202/205-5229.

Any nutritional claims about the product void the exemption. Thus, advice that a product is "healthy," "packed with energy," "low in fat" automatically require full nutritional labeling.

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Honey labeling also falls under the Florida Food Law. Specific provisions of the law are found in Title 21, Code of Federal Regulations, Part 101, entitled, "Food Labeling" which have been adopted under the Florida Food Law, Chapter 500, F.S. The regulations deal with required information, placement, and label and lettering size for mandatory information. It is impossible to outline full details of these regulations, but what follows reflects the basic requirements.

The following guidelines are appropriate when designing honey labels: 1. Statement of identity or name of product: a.All products labeled "honey," must be pure honey as defined by Florida Law, "... only the natural food product made by honey bees from the nectar of flowers or the saccharine exudation of plants, containing no other additives." b.Floral source may be included in front of the word, "honey". (Example: Tupelo Honey).

c.The floral source **cannot** be qualified by the term, "pure", since bees do not exclusively use one floral source, only predominantly. (Example: Pure Tupelo Honey). The statement "Pure Honey - Tupelo," is permitted.

d.Honey from one floral source **cannot** be blended with honey from another floral source and the honey retain one of the honey floral source identifiers. This blend of honeys must either be identified simply as "pure honey" or "honey, a blend of \_\_\_\_\_ and \_\_\_\_\_ honeys".

2. Declaration of Contents or how much honey is in the container.

a.Must be placed in the lower 30% of the display panel (label).

b.Must be expressed as "Net Wt. \_\_\_\_\_ oz." The English system must be followed by a metric declaration. For example: Net Wt. 1 lb (454 g). Dual declaration of the English unit is voluntary. Place the second declaration in parenthesis.

c.Must be a distinct item on the label separated by at least a space equal to the height of the lettering used in the declaration both above, below, and alongside the statement.

d.The statement of net contents may be blown or embossed if all other required information is also blown or embossed.

e.Legibility requirements include: (1)Lettering to be no more than 3 times as high as wide.

(2)Letter heights are measured using the upper case unless upper and lower case is used, it is the lower case letter "o" must meet the minimum type size.

(3)The height of type used in the net contents statement is determined by the size of the package container capable of bearing a label. The minimum type size is 1/16" for those < 5 sq. in.; areas < 25 sq. in. require letters 1/8" in height minimum; and for 25 - 100 sq. in., 3/16" in height.

3. Name and full address of the manufacturer, packer or distributor including zip code. The street address may be omitted if the firm is listed in the current directory.

4. Nutritional labeling is required unless an exemption as a small business is requested. However, if you make any nutrient content or health related statement on the label, then, the exemption is lost and nutrition labeling information is mandatory.

5. The most common mistakes made in honey labels are: a.Placing the net contents in the upper part of the label -- it must be in the lower 30%.

b.Using improper "Net Wt." statement.

c.Omitting a portion of the address, particularly the zip code.

d.Claiming a "pure" floral source.

e.Improperly identifying blended honeys with a single floral source.

Questions regarding compliance or samples of labels can be forwarded to the Food Laboratory, 3125 Conner Blvd., Tallahassee, FL 32399-1650, telephone 904/488-0670 or FAX 904/487-6573 with a request for review.