

*I think a statement of Apimondia on Honey adulteration is important. But relation to the Apimondia statement on honey fraud in this January need to be clarified. My concern are below:*

*1. This is an important statement of Apimondia that can make someone misunderstand and worry for many consumers and harmful for honey producers. Therefore need to be discussed frankly, carefully from several working groups from all members or their proxy and scientist, honey producers and customers by several rounds and then voting by all before Apimondia can issue an statement officially.*

*2. Table 1: There was an speculation on one-box Langstroth-type during honey crop because Codex Stand 12-1981 revised 1987 and 2001 had no any word mentioned about types of bee hive.*

*3. Honey dehydration is necessary with a part of honey produced in tropical zones and some type of honey because of beekeeping ecology and nectar sources where bees have difficulty in drying honey during ripening process. There are two problems in this accusation of fraud.*

*3.1. Even moisture of honey meet Codex Stand 1981 and EC Directive 2001/110/EC of 20 December 2001 regulated moisture of general type of honey is not more*

*than 20% but both institutions accept moisture of heather honey is not more than 23% as exceptional case. I would say all most of research on honey quality focused in temperature region only where climatic ecology. nectar sources has more advantage conditions on tropical zones during honey season. While nectar sources in tropical zone in rainy season with warm temperature and hight humidity with some nectar sources bees are not able to dry honey although honey ripen and sealed moisture of honey is still at 23-24%.*

*3.2 As a hygroscopic food, honey easily absorbed moisture from air humid from ambient environment. Moreover buyer always require all honey in trading must have moisture lower than 19%. **In this case tropical honey must be dehydrated artificially. Therefore I believe that it is unfair to state that is fraud.***

*4. Why to state that a type of honey made fraud if it is produced by bees and meet all parameters of a natural honey. **I am worry about that honeys coming from tropical zones may be suffering a bias?***

*Thank you.*

*Best regards,*

*Tam*

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