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# The Integrity of Imported Organic Honey: A Regulatory Brief

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## Executive summary

There is a gap in the verification of imported organic honey, which makes up the great majority of the organic honey sold in Canada. The defining claim of that honey — that the bees foraged within a clean, GMO-free zone — is never tested against the product at any point on its way to the Canadian consumer. The honey enters under an equivalency agreement with the US (where there is no USDA beekeeping standard) and is checked here only on paper. There is a lack of transparency and we propose specific, proportionate measures to close the gap. We are asking that a verifiable claim actually be verified.

- Most organic honey sold in Canada is imported; Brazil supplies an estimated 90% of the world's organic honey. [1][10]
- Canada has no organic equivalence with Brazil. Brazilian honey enters as organic through the US–Canada Organic Equivalency Arrangement, which recognises US-certified product “regardless of country of origin”; under the Safe Food for Canadians Regulations the CFIA validates the certificate after arrival — it does not test the honey. [4][5][6]
- The US has no apiculture-specific standard — honey is certified under general livestock rules, at each private certifier's discretion. [1][2]
- The defining organic condition is never verified against the product, in a country that is ~99% GM soy and ~95% GM maize, and where both glyphosate and GM pollen have been detected in Brazilian honey. [3][13][19][20]
- Independent surveillance repeatedly finds imported honey adulterated: in the CFIA's own risk-based sampling, 13% — almost all of it imported; the EU's 2021–22 action flagged 46% of imports; US FDA testing, 10%. [7][8][15]
- Laboratory tests exist that would verify the organic claim. We ask that it be applied to imported organic honey.

## How imported organic honey reaches the Canadian consumer — and where verification fails

Organic certification of honey rests on the foraging environment: under the Canadian Organic Standard (CAN/CGSB-32.310, with permitted substances in 32.311) and the EU standard, the colonies must forage within roughly a 3 km radius free of prohibited substances and GMOs. That is a demanding, location-specific condition — and it is the one the system never checks against the product. [3]

In the United States, which certifies most of the world's traded organic honey, the National Organic Program has never enacted an apiculture standard. A USDA spokesperson confirms beekeeping is certified under the general livestock regulations, and the Organic Trade Association acknowledges this produces “a great deal of variability” among certifiers. A US organic certificate may be issued anywhere in the world; of the 100-plus apiaries certified organic to the US standard, only five are in the United States. [1][2]

Canada specifically does not recognize Brazil's organic system as equivalent. Brazilian honey nonetheless enters Canada as organic by an indirect route: it is certified to the US standard by a US-accredited certifier, then admitted under the US–Canada Organic Equivalency Arrangement, which the CFIA states covers product that “does not have to originate within either country.” At the border, under Part 13 of the Safe Food for Canadians Regulations, the importer files the organic certificate and the CFIA validates it after the shipment has arrived; the honey itself is not tested, and the importer — not the regulator — bears responsibility for organic integrity. [4][5][6]

The result is a chain in which the apiary is inspected by a private certifier in Brazil, that certifier's competence is recognised by the USDA rather than by Canada, and Canada accepts the chain on the strength of the paperwork. The same structural pattern holds for the European Union, which also has no equivalence with Brazil and relies on recognised private control bodies and an electronic certificate of inspection — a more rigorous regime than Canada's [17]

## Why the unverified claim carries real risk

### GM crops and the forage zone

Organic rules require a GMO-free forage zone, and EU law treats GM pollen as a constituent of honey. Brazil is the world's second-largest grower of GM crops. The producing region of the Northeast (the Caatinga) overlaps the MATOPIBA agricultural frontier — ~11% of the Cerrado and is advancing into the nearby states. Honey output in Tocantins fell ~50% in a decade from deforestation and pesticides. [3][13][14][19][20]

### Documented adulteration

In the CFIA's 2019–20 surveillance, the adulterated honey was almost entirely imported; the EU's 2021–22 action found 46% of import consignments suspect (with OLAF documenting origin fraud); US FDA testing found 10%. (the US methodology only checked for C4 adulteration which cannot detect the more common rice syrup adulteration so it is likely the amount is much higher) [7][8][15]

### Below-fair-value trade and governance context

In 2022 the US found Brazilian raw honey sold below fair value and injuring domestic producers, and imposed antidumping duties. Brazil's food-inspection system has a documented integrity problem (the 2017 “Operation Weak Flesh” bribery of meat inspectors), and the country scored 34/100 (107th of 180) on Transparency International's 2024 index. [16][22][18]

### The claim is testable

Pollen is the fingerprint of a honey's origin; the evidence indicates Brazilian organic honey retains its pollen, so it can be analysed — for a pollen spectrum matching the claimed forage, for GM soy/maize pollen, and for glyphosate residue. The tools exist; they are simply not required. [21]

## Recommendations

We propose the following proportionate, evidence-based measures.

1. **Extend honey authenticity surveillance to the organic claim.** The CFIA already tests honey for sugar adulteration (stable-isotope and NMR). For product sold as organic, add melissopalynology (origin), GM-PCR (transgenic pollen) and glyphosate/AMPA residue screening, on a risk basis weighted to high-volume origins. [6][7]

2. **Review the equivalency back-door for honey.** Assess whether honey certified to the US NOP — a programme with no apiculture standard — should continue to qualify as Canada-organic under the USCOEA “regardless of origin” provision, particularly for third-country product such as Brazilian honey. [4][5]
3. Clarify how the GMO-free forage requirement is verified for organic honey certified abroad and require evidence that it is met. [3]
4. Apply risk-based product testing at import, not only certificate validation, for organic honey from origins with high GM-crop prevalence and a documented adulteration record. [6]
5. Strengthen honey origin labelling and traceability, consistent with the direction the EU is taking, so that blended and re-exported product is transparent to the consumer and the regulator. [15]
6. Engage the Canada Organic Office, CGSB and international counterparts (USDA, EU) on closing the apiculture-standard gap that underlies the problem. [1][2]

The Canadian Beekeepers Federation would welcome the opportunity to discuss this evidence, to assist with sampling, and to provide technical contacts for the analyses described.

*Respectfully submitted on behalf of the Canadian Beekeepers Federation.*

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## References

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