

**CIRCULAR**

**INSPECTION AND SUPERVISION OF VETERINARY HYGIENE AND FOOD  
SAFETY FOR HONEY**

*Pursuant to Decree No. 15/2017/ND-CP dated February 17, 2017 of the Government administering functions, tasks, powers and organizational structures of the Ministry of Agriculture and Rural Development;*

*Pursuant to the Law on Food Safety dated 2010;*

*Pursuant to the Law on Animal Health dated 2015;*

*Pursuant to the Law on Husbandry dated 2018;*

*Pursuant to Decree No. 15/2018/ND-CP dated February 02, 2018 of Government elaborating the Law on Food Safety;*

*At request of Director of Department of Animal Health;*

*The Minister of Agriculture and Rural Development promulgates Circular on inspection and supervision of veterinary hygiene and food safety for honey.*

**Chapter I**

**GENERAL PROVISIONS**

**Article 1. Scope**

1. This Circular prescribes inspection and supervision of veterinary hygiene and food safety in beekeeping, purchase, preparation, and processing of honey for domestic consumption and export.
2. Inspection of compliance with commitments of beekeeping facilities and honey purchasing facilities shall conform to Circular No. 17/2018/TT-BNNPTNT dated October 31, 2018 of the Minister of Agriculture and Rural Development (hereinafter referred to as “Circular No. 17/2018/TT-BNNPTNT”).

3. Appraisal and certification of compliance with food safety regulations in regard to honey processing facilities shall conform to Circular No. 38/2018/TT-BNNPTNT dated December 25, 2018 of the Minister of Agriculture and Rural Development (hereinafter referred to as “Circular No. 38/2018/TT-BNNPTNT”).

## **Article 2. Regulated entities**

This Circular applies to:

1. Organizations and individuals engaged in beekeeping, purchase, preparation, or processing of honey for domestic consumption and export.
2. Agencies, organizations, and individuals related to inspection and supervision of veterinary hygiene and food safety for honey.

## **Article 3. Definition**

In this Circular, terms below are construed as follows:

1. “*raw honey*” refers to honey extracted without undergoing any preparation stage.
2. “*strained honey*” refers to honey that have been prepared (strained to eliminate impurities) of one or many batches of honey.
3. “*commercial honey*” refers to honey that has been processed (filtered, mixed, pasteurized, and potentially dehumidified) and is ready for use either directly or as a food ingredient.
4. “*a beekeeping facility*” refers to a facility where beekeeping is practiced and raw honey is extracted.
5. “*a honey purchasing facility*” refers to a facility that purchases and preserves raw honey in order to supply honey processing facilities.
6. “*a honey processing facility*” refers to a facility that processes raw honey and strained honey either manually or industrially in order to create pasteurized honey.
7. “*residues of toxic substances*” (hereinafter referred to as “*residues*”) refer to the remaining amount of veterinary drugs, growth and reproduction stimulants, plant protection chemicals, environment-based and food-based pollutants and metabolites thereof in honey that can potentially damage health of consumers.

## **Article 4. Inspection and supervision authorities**

1. The Department of Animal Health shall inspect and supervise honey production facilities (which include beekeeping facilities, honey purchasing facilities, and honey

processing facilities) for export; honey production facilities for both export and domestic consumption.

2. Departments of Agriculture and Rural Development shall inspect and supervise honey production facilities other than those mentioned under Clause 1 of this Article.

3. Department of Animal Health and Departments of Agriculture and Rural Development shall be collectively referred to as inspection and supervision authorities.

#### **Article 5. Rules on developing and implementing Supervision program**

1. Basis for developing Supervision program: conforms to Article 8 hereof.

2. Details of Supervision program: conform to Article 9 hereof.

3. Expenditure on implementing Supervision program

a) Expenditure on inspection and supervision of the inspection and supervision authorities shall conform to applicable decentralization of state budget. Production of estimates, management and use of expenditure on inspection and supervision shall conform to the Law on State Budget and guiding documents;

b) Department of Animal Health shall take charge developing estimates, requesting the Ministry of Agriculture and Rural Development to approve and allocate expenditure on implementing Supervision program on an annual basis in regard to facilities mentioned under Clause 1 Article 4 hereof;

c) Departments of Agriculture and Rural Development shall take charge developing estimates and requesting competent local authorities to approve and allocate expenditure on implementing Supervision program on an annual basis in regard to facilities mentioned under Clause 2 Article 4 hereof.

#### **Article 6. Requirements for organizations and individuals engaging in Supervision program**

1. With respect to testing laboratories engaging in Supervision program

a) Testing laboratories affiliated to Department of Animal Health and engaging in the Supervision program for export honey: must receive conformity assessment as per ISO 17025; use approved testing methods as per the law;

b) Testing laboratories other than those mentioned under Point a of this Clause: must receive conformity assessment as per ISO 17025; must obtain the Certificate of testing activity as per Decree No. 107/2016/ND-CP dated July 1, 2016 of the Government; operate within fields related to supervision indicators of annual approved supervision plan.

2. With respect to heads, members of inspection and supervision teams and sample collectors

a) Heads of inspection and supervision teams: must be department managers or higher of inspection and supervision authorities or heads of entities assigned by inspection and supervision authorities to take charge implementing the Supervision program;

b) Members of inspection and supervision teams: must obtain at least one university-level degree or higher in husbandry, animal health, food technology, biotechnology, and agricultural product processing; have attended professional training courses organized by Department of Animal Health in fields appropriate to fields of inspection and appraisal;

c) Sample collectors: must be trained in husbandry, animal health, food technology, biotechnology, or agricultural product processing; must obtain certificate of completion of sample collection training courses organized by Department of Animal Health.

## **Chapter II**

### **HONEY INSPECTION AND SUPERVISION**

#### **Article 7. Veterinary hygiene and food safety inspection, supervision for production facilities of export honey**

1. Beekeeping facilities and honey purchasing facilities: supervise compliance with commitments in accordance with Circular No. 17/2018/TT-BNNPTNT and demand of importing countries.

2. Honey processing facilities

a) Inspection shall be carried out in form of inspection for issuance of Certificate of veterinary hygiene;

b) Supervision of veterinary hygiene shall conform to Article 38 of Circular No. 09/2016/TT-BNNPTNT dated June 1, 2016 of the Minister of Agriculture and Rural Development amended by Clause 11 of Circular No. 10/2022/TT-BNNPTNT dated September 14, 2022 of the Minister of Agriculture and Rural Development on amendment to Circular No. 09/2016/TT-BNNPTNT;

c) Inspection and supervision of veterinary hygiene and food safety of facilities that have obtained certificates equivalent to certificate of veterinary hygiene shall be carried out at request of the importers or exporters;

Certificates equivalent to certificate of veterinary hygiene include certificates under Clause 3 Article 36 of Circular No. 09/2016/TT-BNNPTNT amended by Clause 9 Article 1 of Circular No. 10/2022/TT-BNNPTNT.

3. Supervision of veterinary hygiene and food safety of honey production facilities mentioned under Clause 1 and Clause 2 of this Article and sampling for supervision of food safety shall be carried out simultaneously for honey under annual Supervision program and at request of importing countries.

4. Actions against honey production facilities that fail to meet veterinary hygiene and food safety supervision indicators as per the law:

a) Inspection and supervision authorities shall take actions as per applicable laws in case honey production facilities fail to take corrective measures or fail to report correction results and time for unqualified indicators specified in the inspection record or assessment record;

b) Request conformity assessment bodies or supervisory authorities to revoke certificates of facilities that fail to adhere to recognized quality control system with respect to facilities that have obtained certificates equivalent to certificate of veterinary hygiene.

#### **Article 8. Basis for developing Supervision program**

1. List of honey production facilities that have obtained certificate of veterinary hygiene or certificates equivalent to certificate of veterinary hygiene together with information pertaining to the facilities (name, address, phone number, email), date of issue, validity, and issuing authority.

2. Honey yield of the year preceding the year in which Supervision program is developed.

3. Test results of honey and bee feed samples of Supervision program implemented 3 years prior to the year in which Supervision program is developed.

4. Warnings and recommendations of competent authorities pertaining to food safety for honey in order to determine indicators that potentially lead to food safety violation.

5. Requirements and regulations of Vietnam pertaining to the use of chemicals, antibiotics, veterinary drugs prohibited or restricted for use in animal health; regulations of importing countries with respect to honey production for export.

#### **Article 9. Details of Supervision program**

1. Supervise compliance of honey production facilities with regulations and law on veterinary health and food safety

a) With respect to production facilities of export honey: supervise in accordance with Clause 1 and Clause 2 Article 7 hereof;

b) With respect to honey production facilities other than those specified under Point a of this Clause: supervise in accordance with Circular No. 17/2018/TT-BNNPTNT and Circular No. 38/2018/TT-BNNPTNT;

c) With respect to honey production facilities with unqualified supervision indicators: comply with Clause 4 Article 7 hereof.

2. Develop supervision sample pool and announce the plan for implementing Supervision program, including:

a) Quantity of honey samples collected from beekeeping facilities, honey purchasing facilities, and honey processing facilities in order to monitor residues and contaminating microorganisms;

b) Quantity of feed collected from beekeeping facilities in order to supervise the use of veterinary drug in beekeeping;

c) Notify the plan for implementing Supervision program to relevant agencies, entities, and facilities where samples are collected.

3. Collect samples, adjust sampling plan (if necessary), and analyze samples based on annual approved indicators and analysis methods in accordance with Article 10 hereof.

4. Deal with samples that do not meet veterinary hygiene and food safety standards in accordance with Article 11 hereof.

5. Consolidate and produce report on annual supervision results for management purposes and at request of importing countries (in case of production facilities of export honey).

#### **Article 10. Sample collection and analysis**

1. Based on sample pool of annual Supervision program under Point a and Point b Clause 2 Article 9 hereof, inspection and supervision authorities shall perform random sampling or purposive sampling in order to supervise samples of raw honey, strained honey, pasteurized honey, and bee feed.

2. Annual sampling period shall be defined based on honey extraction and production season of each beekeeping facility.

3. Sampling location

a) With respect to raw honey samples from beekeeping facilities and honey purchasing facilities: based on honey season, regions, and locations where honey purchasing facilities are located;

If sampling cannot be performed in beekeeping facilities and honey purchasing facilities, samples of raw and unprepared honey that has been transported to processing facilities are also viable;

b) With respect to strained honey and pasteurized honey samples from honey processing facilities: based on supervision and centralized sampling time of the region and location where honey processing facilities are located.

#### 4. Sampling method

a) Honey sampling: comply with guidance under Appendix I attached hereto;

b) Feed sampling: comply with TCVN 13052:2021. Husbandry feed - Sampling.

5. Collected samples must be immediately sealed and coded.

#### 6. Sample analysis

a) Inspection and supervision authorities shall send the samples to testing laboratories to analyze residues and contaminating microorganisms as per annual Supervision program approved by competent authorities;

b) Analysis results shall be stored at the testing laboratories;

c) Organizations and individuals have the right to provide feedback pertaining to results of the first analysis; the right to retrieve samples from honey containers from which samples have been collected or use retention samples to analyze again; the obligation to incur the costs when analyzing samples again.

### **Article 11. Dealing with samples that do not meet veterinary hygiene and food safety standards during implementation of the Supervision program**

If, during sample analysis, veterinary hygiene and food safety indicators are found to disregard regulations of Vietnam or importing countries, inspection and supervision authorities shall:

1. Notify analysis results to relevant supervisory authorities in writing:

If the samples do not adhere to regulations, immediately inform relevant supervisory authorities and facilities from which the samples that do not meet veterinary hygiene and food safety standards are collected in writing while include the following information:

a) Name of facilities from which the samples that do not meet veterinary hygiene and food safety standards are collected;

- b) Batches and quantity of products that do not meet veterinary hygiene and food safety standards;
- c) Sampling date and sample test results;
- d) Reason for failing to meet veterinary hygiene and food safety standards;
- dd) Request for immediate ceasing of the use of honey in preparation or immediate suspension of sale of honey batches that do not meet veterinary hygiene and food safety standards or immediately suspension of use of veterinary drugs in beekeeping;
- e) Request for immediate origin tracing in accordance with Circular No. 17/2021/TT-BNNPTNT dated December 20, 2021 of the Minister of Agriculture and Rural Development (hereinafter referred to as “Circular No. 17/2021/TT-BNNPTNT”) and submission of reports on implementation results to inspection and supervision authorities.

2. Inspection and supervision authorities shall appraise implementation of origin tracing and results of correction of the facilities and, if necessary, trace the entire honey production chains (if honey samples do not meet veterinary hygiene and food safety standards) in order to retrieve and deal with honey that does not meet food safety standards as per Articles 12 through 14 under Circular No. 17/2021/TT-BNNPTNT.

3. Implement advanced supervision and purposive sampling in regard to honey production facilities from which samples that do not meet veterinary hygiene and food safety standards are collected throughout the year of Supervision program and the following year.

If more samples of a facility continue to fail to meet veterinary hygiene and food safety standards as per the law, inspection and supervision authorities shall inspect and take actions as per the law.

4. Facilities from which samples that do not meet veterinary hygiene and food safety standards are collected must incur all sampling, analysis, advanced supervision, and batch disposal costs.

### **Chapter III**

#### **USE OF VETERINARY DRUGS AND FEED IN BEEKEEPING**

##### **Article 12. Use of veterinary drugs and feed in beekeeping**

1. Only veterinary drugs permitted for sale in Vietnam are allowed for the purpose of preventing and treating diseases of bees as per the law.
2. Veterinary drugs for preventing and treating diseases of bees must be used as per instructions of manufacturers and prescriptions of veterinarians. Prescription of

veterinary drugs shall conform to Circular No. 12/2020/TT-BNNPTNT dated November 9, 2020 of the Minister of Agriculture and Rural Development and Circular No. 13/2022/TT-BNNPTNT dated September 28, 2022 of the Minister of Agriculture and Rural Development.

3. The use of feed in beekeeping must adhere to regulations and law on husbandry feed.

## **Chapter IV**

### **ORGANIZING IMPLEMENTATION**

#### **Article 13. Responsibilities of Department of Animal Health**

1. Carry out tasks under Point b Clause 3 Article 5 hereof.
2. On an annual basis, review, adjust, and revise Supervision program pertaining to indicators, sample analysis methods, maximum permissible residue level in honey, and list of facilities placed under supervision and notify agencies, organizations, and individuals relating to Supervision program.
3. Produce list and update dossiers, codes of production facilities of export honey in supervision program; systematically store all relevant information and data.
4. Inspect origin tracing and correction results of facilities from which samples that do not meet veterinary hygiene and food safety standards are collected during supervision in accordance with Circular No. 17/2021/TT-BNNPTNT.
5. Conduct inspection in order to issue certificate of veterinary hygiene for production facilities of export honey in accordance with Point a Clause 1, Clauses 2 through 6 Article 37 of Circular No. 09/2016/TT-BNNPTNT amended by Clause 10 Article 1 of Circular No. 10/2022/TT-BNNPTNT.
6. Consolidate and report figures, provide explanation for issues pertaining to the implementation of Supervision program; produce annual, periodic, and irregular reports at request of Ministry of Agriculture and Rural Development pertaining to implementation results; consolidate information, analyze, and assess appropriate activities in order to propose necessary corrective measures or adjustment and revision to Supervision program.
7. Manage, use, and distribute expenditure on implementing approved Supervision program to entities affiliated to the Department of Animal Health as per the law.
8. Popularize, publicize, and guide honey production facilities to adhere to this Circular and regulations, standards and regulations pertaining to residues in honey products, the use of veterinary drugs in preventing and treating diseases of bees in order to meet veterinary health and food safety standards in honey production.

9. Organize training and provide professional guidance for agencies, organizations, and individuals related to the implementation of Supervision program.

10. Take charge and cooperate with inspectorates of competent authorities of importing countries; report, provide information at request of competent authorities of importing countries.

#### **Article 14. Responsibilities of Departments of Agriculture and Rural Development**

1. Carry out tasks under Point C Clause 3 Article 5 hereof.

2. Update and inform honey production facilities about list of facilities placed under supervision in annual Supervision program.

3. Produce list and update dossiers, codes of production facilities of honey for domestic use in provinces in Supervision program; systematically store all relevant information and data.

4. Inspect origin tracing and correction results of facilities from which samples that do not meet veterinary hygiene and food safety standards are collected during supervision in accordance with Circular No. 17/2021/TT-BNNPTNT.

5. Consolidate and produce annual, periodic, irregular reports at request of People's Committees of provinces and Ministry of Agriculture and Rural Development pertaining to Supervision program in the provinces; consolidate information and assess appropriate activities in order to propose adjustment and revision to annual Supervision program.

6. Manage and use approved funding for entities affiliated to Departments of Agriculture and Rural Development as per the law.

7. Popularize, publicize, and provide guidelines on regulations on production of bee feed; the use of veterinary drugs in preventing and treating diseases of bees in a manner adhering to veterinary hygiene and food safety standards for honey production facilities in the provinces.

8. Cooperate with Department of Animal Health in implementing Supervision program in regard to production facilities of export honey in the provinces when necessary.

#### **Article 15. Responsibilities of testing laboratories**

1. Adequately adhere to procedures, ensure accuracy, objectivity, and honesty; assume responsibilities for sample analysis results in Supervision program.

2. Ensure confidentiality of sample analysis information and results as per the law; only notify sample analysis results to inspection and supervision authorities.

3. Adhere to sample analysis time in Supervision program at request of inspection and supervision authorities.

4. Store relevant documents as per the law and present at request of competent authorities.

#### **Article 16. Responsibilities of Vietnam Beekeepers Association**

1. Cooperate with Department of Animal Health in working with relevant competent authorities of importing countries pertaining to honey export; update request of competent authorities of importing countries pertaining to food safety standards applicable to export honey.

2. Participate and cooperate in popularizing regulations on veterinary hygiene and food safety of honey to honey production facilities.

3. Consolidate difficulties and issues in honey production and request competent authorities to review.

4. Propose and provide feedback pertaining to risks of violation of veterinary hygiene and food safety of honey to inspection and supervision authorities in accordance with Article 4 hereof.

#### **Article 17. Responsibilities of beekeeping facilities, honey purchasing facilities, and honey processing facilities**

1. Beekeeping facilities are responsible for:

a) practicing beekeeping procedures that meet veterinary hygiene and food safety standards;

b) extracting honey for food preparation purposes only after adequately complying with withholding period according to instructions of veterinary drug manufacturers;

c) keep beekeeping logbook to monitor and record diseases of bees; the use of veterinary drugs to prevent and treat diseases of bees, the use of feed in beekeeping; extraction and supply of honey to honey purchasing facilities, honey processing facilities mentioned under Appendix III attached hereto;

d) complying with inspection and supervision stated under this Circular and guidance of inspection and supervision authorities pertaining to assurance of veterinary hygiene and food safety for honey. Providing adequate information and documents during beekeeping process and honey extraction at request of inspection and supervision authorities;

dd) strictly complying with decision imposing penalties for violations issued by competent authorities and incurring all costs for origin tracing, sampling, and testing of

advanced supervision samples when honey does not meet veterinary hygiene and food safety standards.

2. Honey purchasing facilities are responsible for:

- a) adequately implementing and regularly maintaining food safety standards during purchase and sale of raw honey;
- b) producing list of beekeeping facilities that supply raw honey in accordance with Appendix II attached hereto;
- c) storing all quality control and food safety documents and documents on sale of raw honey for at least 3 years;
- d) complying with inspection and supervision in accordance with this Circular and guidance of inspection and supervision authorities pertaining to assurance of food safety in sale and purchase of honey;
- dd) strictly complying with decision imposing penalties for violations issued by competent authorities and incurring all costs for origin tracing, sampling, and testing of advanced supervision samples when honey does not meet food safety standards.

3. Honey processing facilities are responsible for:

- a) adequately implementing and regularly maintaining food safety standards in accordance with food safety management system within certified standards in honey processing;
- b) establishing and maintaining origin tracing and information storage systems for the purpose of tracing origin and establishing procedures for retrieving honey that does not meet food safety standards in accordance with Circular No. 17/2021/TT-BNNPTNT;
- c) producing list of beekeeping facilities, honey purchasing facilities that supply raw honey in accordance with Appendix II attached hereto;
- d) popularizing and publicizing beekeeping procedures, honey extraction and sale procedures that meet veterinary hygiene and food safety standards, raising awareness of beekeepers pertaining to disease prevention and awareness of affiliated beekeeping facilities and purchasing facilities pertaining to the use of veterinary drugs in beekeeping;
- dd) storing all quality control and food safety documents for at least 3 years;
- e) complying with inspection and supervision stated under this Circular and guidance of inspection and supervision authorities pertaining to assurance of food safety for honey. Providing all relevant information and documents on production at request of inspection

and supervision authorities and assuming responsibilities for provided information and documents;

g) strictly complying with decision imposing penalties for violations issued by competent authorities and incurring all costs for origin tracing, sampling, and testing of advanced supervision samples when honey does not meet food safety standards.

## **Chapter IV**

### **IMPLEMENTATION**

#### **Article 18. Implementation**

1. This Circular comes into force from December 10, 2022.
2. This Circular replaces Circular No. 08/2015/TT-BNN dated March 2, 2015 of the Minister of Agriculture and Rural Development.
3. Honey inspection and supervision programs, plans approved before the effective date hereof shall remain valid until the end of December 31, 2022.
4. Certificates of completion of professional training in the fields of inspection, appraisal, and sampling issued before the effective date hereof remain valid.
5. Director of Department of Animal Health, heads of relevant entities, organizations, and individuals are responsible for implementation of this Circular.

Difficulties that arise during the implementation of this Circular should be reported to Ministry of Agriculture and Rural Development (via Department of Animal Health)/.

**PP. MINISTER  
DEPUTY MINISTER**

**Phung Duc Tien**

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