



*Pollinator Stewardship Council*  
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Dear FDA,

The Pollinator Stewardship Council joins with the American Honey Producers Association over the FDA requirement of packaged honey to include a nutrition label listing both “Total Sugars” and “Added Sugars.” This requirement does not distinguish between the two sugar types. Therefore, labels will need to include the same amount of grams of sugar under each category e.g. “17 grams of Total Sugar” and “17 grams of Added Sugars.” This will confuse food consumers.

If this label is implemented at the commercial beekeeping level it will begin the misinformation to food consumers that sugar is added to honey. Eventually, it will create confusion across the honey industry and mislead the consumer about a natural product.

*As stated in 21 US Code §342 (b)(4), “A food shall be deemed to be adulterated... if any substance has been added thereto or mixed or packed therewith so as to...make it appear better or of greater value than it is.”*

If consumers are informed through the Nutrition Facts label that honey contains “Added Sugars” then consumers may be led to believe that honey is adulterated, by the regulatory definition, with sugars added to develop or enhance its sweetness.

We realize that honey is added to foods in preparation or manufacturing and in that case it is clearly an added sugar in those foods and would therefore be labeled as “Added Sugars” on the Nutrition Facts label. However, pure honey, itself, does not contain added sugars.

We share the desire for clear, understandable nutrition information to aid consumer choice. Our desire, as is the FDA’s, is to inform consumer food choices to promote public health without confusion or misbranding around pure honey.

We encourage the FDA to consider listing the naturally occurring sugar content of 100% pure honey as a “Total Sugar” and not “Added Sugars.”

Sincerely,

Michele Colopy  
Program Director

*The Pollinator Stewardship Council’s mission is to defend managed and native pollinators vital to a sustainable and affordable food supply from the adverse impact of pesticides.*