Japan's approach to honey authenticity

Foreign-amylase testing, purchasing requirements and the limits of the public evidence

A GHIC technical report for public authorities, retailers, importers, laboratories and the public

A practical control pathway

From a credible authenticity finding to a documented product decision. Japan offers a concrete industry example; the reviewed record does not establish a universal new import-testing mandate.

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01 / READ THIS FIRST

Executive findings

Finding

Japan provides a documented example of an industry-led honey authenticity programme moving from laboratory capability to purchasing recommendations and retailer communication. Public evidence does not establish a new universal government authenticity test for every Chinese honey consignment. [01] [04] [10]

The most plausible explanation of reports that Chinese exporters now face greater difficulty is the combined use of foreign-amylase screening, confirmatory protein identification, diastase activity and additional syrup-marker evidence. The practical barrier can arise in a buyer's acceptance specification. Its effectiveness depends on implementation, sampling and the handling of adverse results; the public record does not quantify coverage.

What the record establishes

- A Council recommendation introduced in July 2024 was supplemented in January 2025 with diastase testing after a negative foreign-amylase result. [02]
- The Council described suspected Chinese bottled-honey products from 14 non-member companies and a change in the observed adulteration pattern. These are industry-reported findings and suspicions submitted to the CAA, not a final official adjudication. [03]
- The supermarket association asked retailers to obtain relevant supplier test results alongside product specifications. This is the clearest evidence of a procurement pathway. [04]
- The latest located MAFF progress sheet, dated 30 June 2026, places the Native-PAGE JAS proposal at stage 1. A method-standardisation project is not proof of an enacted import requirement. [09]

GHIC position

Authorities and responsible buyers should assess whether their current evidence can answer the actual authenticity question. They should establish a documented route from a credible adverse result to further investigation, a reasoned product decision and corrective action where required. A compliant result from one analytical approach should not automatically cancel a materially different, technically substantiated finding.

Decision requested: name a technical owner; identify evidence gaps; agree a method-specific assessment and sampling plan; record the product decision and its basis; set a date for a written response. These are GHIC proposals, not requirements attributed to Japan.

02 / HOW TO READ THE FINDINGS

Scope, evidence and chronology

This report addresses a specific question: what has recently changed in Japan that could make it harder for adulterated honey from China to reach Japanese buyers? It combines Japanese and Chinese primary materials with laboratory documents, scientific publications and narrowly attributed trade reporting. It is not a market survey, a legal determination about an operator, or an independent audit of Japanese imports.

Date	Documented milestone
2023	Publication of the improved Native-PAGE market-sample study. [07]
July 2024	Council recommendation to members and supporting members. [02]
Aug-Dec 2024	Public method notice and revisions explain screening and confirmation. [01]
27 Jan 2025	Additional diastase recommendation following a negative screen. [02]
15 Jul 2025	Council referral of suspected products to the CAA. [03]
Sep 2025	Retailer bulletin and bilateral discussion with Chinese industry. [04] [11]
Oct-Nov 2025	Twelve-laboratory qualitative collaborative study published. [08]
30 Jun 2026	Latest located JAS progress sheet: stage 1. [09]
8 Oct 2026	Inspected MHLW import-order list last amended. [10]
15 Oct 2026	Next bilateral conference scheduled; still in the future at cut-off. [19] [20]

Evidence categories

Official record: shows what an authority lists or announces. **Industry primary source:** shows what the organisation recommends, reports or claims. **Scientific study:** supports a specified method or observation within its study design. **GHIC analysis:** draws a stated inference or proposes a future action. These categories are kept distinct throughout.

A September 2026 English news item tracks an April 2026 Japanese report. Publication recency should not be mistaken for the adoption date of a new control. [21] [22]

03 / INSTITUTIONS AND IMPLEMENTATION

Who is doing what

Actor	Role supported by the sources
Japan Honey Fair Trade Council	Industry recommendation, methodological cooperation, communication to members and referral of suspicions. The Council is a self-regulatory body, not Japan's border authority. [01] [04]
Japan Food Research Laboratories	Analytical development and commercially available testing, including confirmatory mass spectrometry. [05] [06]
National Supermarket Association of Japan	Dissemination to retail members; requests for supplier analytical evidence. [04]
Consumer Affairs Agency (CAA)	Recipient of the Council's reported July 2025 referral. The Council notice does not establish the outcome of an official case. [03]
MAFF / JAS process	Officially recorded consideration of standardising the Native-PAGE method. [09]
CFNA and Japanese trade counterparts	Bilateral discussion of honey quality and possible shared commercial specifications. [11]

Why purchasing controls can matter

The commercially relevant question is whether an importer or retailer makes suitable evidence a condition of acceptance, verifies that the sampled material represents the lot, and acts consistently on adverse findings. Those choices can create a substantial barrier for a non-conforming supplier without a new universal border law. This is GHIC's explanation of the reported mechanism, not a measured estimate of its reach.

The reviewed material does not establish a common mandatory three-test panel, independent sampling of every shipment, a national shared results database, universal pre-export approval, or the proportion of Chinese supply covered. These remain specific verification questions rather than assumptions.

04 / ACTIVITY, IDENTITY AND COMPLEMENTARY EVIDENCE

The analytical mechanism

Diastase activity may be reduced by dilution with syrup, heating or storage. The JFRL account describes the addition of microbial amylase to raise a low activity value. A test that measures total activity therefore asks a different question from one that investigates the biological source of the enzyme. [05]

Element	Question answered	Interpretive boundary
Native-PAGE activity staining	Are there active enzyme bands consistent with foreign amylases?	A screening result requires botanical and analytical context. [05]
LC-QTOF/MS confirmation	Do peptide data identify a foreign amylase and its biological source?	Identity criteria and coverage matter; qualitative detection does not establish the added amount. [06]
Diastase activity	Is measured activity compatible with the applicable product expectations?	A low value is not uniquely attributable to syrup; honey type, heat and storage matter. [02] [05]
Syrup-associated markers	Is there additional chemical evidence relevant to syrup addition?	No single marker should be treated as universally exclusive without a justified scope and decision rule. [18]

The native gel preserves enzyme activity during separation. The confirmatory workflow extracts proteins, produces peptides and compares mass-spectrometric data with protein information. These are complementary stages, not interchangeable names for the same measurement. [05]

Practical meaning

A numerically acceptable activity result cannot by itself explain away a confirmed foreign-protein finding. Equally, a negative targeted foreign-enzyme test does not establish that the product contains no syrup. The evidence must be assessed against the precise analytical question.

The Council's January recommendation explicitly recognises this gap and proposes additional diastase testing after a negative screen. Its July purchasing advice uses alternatives rather than documenting a universal compulsory panel. [02] [03]

05 / WHAT CHANGED IN OBSERVED PRODUCTS

The evidence behind the reported impact

The Council's July 2025 statement describes inexpensive imported Chinese bottled-honey products from **14 non-member companies**. Most reportedly had no detectable foreign amylase, no detectable diastase activity and elevated mannose. The Council submitted suspicions of misleading honey presentation to the CAA and attributed the altered pattern to its testing recommendation. [03]

This is the closest documentary match to the underlying report that Japanese buyers have become more difficult to deceive. It is an interested organisation's account of observed products. It does not identify a representative denominator, prove a nationwide causal effect, or convert the 14 companies into 14 Chinese exporters.

Corroboration from the Chinese side

CFNA's account of the September 2025 bilateral meeting records Japanese concern about the consistency of Chinese imported honey quality. It also describes work by laboratories and businesses towards practical shared trade-quality specifications. That supports the existence of a bilateral commercial issue, while leaving the final specification, compulsory scope and implementation date unresolved. [11]

What would constitute stronger outcome evidence?

- A dated buyer specification with the covered suppliers, products and lots.
- A sampling protocol, chain of custody and documented laboratory decision rules.
- Counts of tested, confirmed non-conforming, accepted and rejected lots, with a defined denominator.
- A comparable baseline and information about changes in product mix, sourcing and purchasing volumes.
- Documented corrective action and subsequent verification, including any later reversal of an initial result.

No collective attribution

Nationality is not an analytical result. The reported observations concern specified products and an identified commercial problem; they do not establish that Chinese honey as a category is adulterated.

06 / USING THE METHOD RESPONSIBLY

Validation and interpretive limits

The 2023 Japanese study investigated 67 market honeys and reported foreign amylases associated with Aspergillus and Geobacillus in a subset. Comparison with mass spectrometry supported the analytical approach for the investigated samples. Those observations should not be converted into a national prevalence estimate. [07]

The 2025 collaborative study involved twelve laboratories and blinded qualitative testing of relevant foreign amylases. Its public abstract reports performance supporting the method. GHIC reviewed the abstract; access to the full article was restricted. Detailed performance values, full raw data and a universal false-positive rate are therefore not asserted here. [08]

Issue	Consequence for a defensible decision
Botanical interference	JFRL identifies problematic gel patterns for manuka, buckwheat, jarrah, cherry, jujube and fir honeys. Confirmation is essential; the service directs these honey types to mass spectrometry. [06]
Negative screen	The service explicitly does not claim to determine the presence or absence of syrup. Its negative result concerns the tested foreign-amylase scope. [06]
Low diastase	Consider product type, temperature history, storage and the relevant standard; do not infer a unique adulteration pathway. [02] [05]
Mannose threshold	The Council's cited 400 mg/kg value is an Intertek reference for blossom honey, not an established Japanese statutory limit. [03]
Foreign protein identity	Require the method version, marker or peptide identity criteria, appropriate blanks and controls, matrix scope and the laboratory's interpretation. A result is not proof of an operator's intent.

The appropriate response to plausible alternative explanations is to identify the evidence that could distinguish them: controlled data, reference material, production history or additional analysis. Merely naming an alternative does not resolve a concrete finding. This is a proposed evidential discipline, not a claim that every alternative pathway has already been excluded.

07 / RELATED DEVELOPMENTS WITH DIFFERENT STATUS

Proteomics, HBG-III and DNA

Foreign-protein confirmation identifies proteins

The JFRL confirmation stage identifies proteins through peptides. The practical Japanese example therefore supports the relevance of protein-based investigations of foreign enzymes. The Native-PAGE ring study validates its own qualitative screening design; it does not validate every proteomics assay or establish Japanese approval of Eurofins THPP1. [05] [08] [30]

An additional research direction: an expected bee protein

A May 2025 study quantified western-honeybee alpha-glucosidase III (HBG-III) using LC-MS/MS. It compared 104 authentic honeys with market samples; 15 of 65 market samples were below the quantification limit, with foreign amylases also observed in 13 of those. The 1.9 mg/kg figure is a laboratory limit of quantification, not a legal import threshold. The peptide strategy was developed for Apis mellifera and is not universally transferable to Apis cerana. [15]

The research is relevant because enzyme activity and protein abundance need not provide identical information after processing. Before a quantitative authenticity decision is proposed, reference coverage, species, honey type, processing effects and a validated decision rule must be addressed. No general Japanese import requirement based on HBG-III was identified.

Technical reception does not equal regulatory approval

The Council's literature catalogue lists the Eurofins proteomics white paper updated in February 2026. This establishes that the document is included in its technical resources. It does not establish endorsement, accreditation or official recognition of a named commercial assay. [16]

DNA testing in a private buyer relationship

An Estonian export-promotion account describes Nordmel's 2024 shipment to a Japanese buyer, with DNA testing contributing to assurance after buyer scrutiny of the operation. It is evidence of a particular commercial relationship. It is not a source for a national Japanese DNA-testing mandate or a universal condition on Chinese honey. [17]

08 / WHAT IS OFFICIALLY DOCUMENTED

Government status and the JAS project

The MAFF progress sheet dated 30 June 2026 lists a proposed JAS for the foreign-amylase test in honey using Native-PAGE, initiated by the Honey Fair Trade Council. The entry is at **stage 1**. The legend distinguishes the start of consideration from consultation, committee resolution and promulgation. [09]

Officially evidenced	Not established by that evidence
A method-standardisation proposal exists.	That a final JAS has already been adopted.
The Council is the identified proponent.	That all Chinese exporters must use a specified laboratory.
Work is recorded in MAFF's process.	That every honey consignment must be held pending authenticity results.
The subject is a Native-PAGE test method.	A general new Japanese diastase or mannose product threshold.

The inspected minutes of the JAS committee meeting of 24 July 2026 do not record adoption of this honey method. A method standard, even once completed, would require a separate basis before being treated as a universal import obligation. [29]

Current import-order check

GHIC inspected MHLW's country/product list of ordered import inspections, last amended 8 October 2026, including the China section and the all-country entries. No requirement for Chinese honey authenticity testing by Native-PAGE, diastase or mannose was identified in that list. [10]

Bounded conclusion

The reviewed official sources do not substantiate a new, general government authenticity-testing obligation for all Chinese honey imports. This finding does not exclude private purchasing rules, undisclosed contract changes or future official action.

Nor does the Council's referral by itself establish an official finding, a penalty or the final disposition of the referred products. Public communications should preserve that procedural distinction.

09 / DO NOT CONFUSE VOLUME WITH AUTHENTICITY

Trade evidence and remaining market problems

Trade reporting in June 2026 continued to describe low-priced Chinese bottled-honey imports, industry concerns and calls for action. This is evidence that the issue remained contested and active; it is not a scientifically measured proportion of adulterated retail honey. [12]

Reporting period	China to Japan: honey volume	Year-on-year change
Full year 2025	33,544.8 tonnes	+5.7% [13]
January-June 2026	15,359.05 tonnes	-12.63% [14]

The China Bee Products Association reports that Chinese honey exports worldwide rose 7.75% in the first half of 2026, while the export value to Japan fell 15.07%. The Japan movement is therefore different from the aggregate export trend. [14]

What the comparison can and cannot tell us

The two rows use different reporting periods; their volumes must not be compared as if they were two full years. Each percentage compares the period with its own prior-year counterpart. The statistics do not distinguish authentic from adulterated honey, buyers with different specifications, or the reasons for a change in shipments.

GHIC therefore treats the 2026 decline as contextual evidence, not a success rate for the testing initiative. A causal assessment would need implementation dates, covered trade flows, rejection data and alternative commercial explanations. A fall in volume does not by itself show that a system is effective; continuing imports do not by themselves show that it is ineffective.

Communication rule

Do not publish a claim that Japan has eliminated honey fraud, that a specified share of Chinese exports has been blocked by authenticity testing, or that all low-priced imports are adulterated. The reviewed evidence does not establish those propositions.

A separate recent Chinese development

China published the recommended national product standard GB/T 47735-2026 on 25 May 2026, with implementation scheduled for 1 December 2026. An August training notice discusses it alongside authenticity parameters including mannose, melibiose and dihydroxyacetone. These are additional leads for technical clarification; they do not demonstrate a Japanese import requirement or prove that particular limits were agreed bilaterally. [31] [32]

10 / EXISTING POWERS, METHOD VALIDITY AND PROPORTIONATE ACTION

Implications for European official controls

The Japanese record is relevant as a practical example; European action must rely on the European legal framework and the facts of the product concerned. Honey composition requirements already exclude the addition of food ingredients or additives when the product is marketed as honey. The applicable product rules and national implementation remain the starting point. [25]

Regulation (EU) 2017/625 requires risk-based official controls, including the risk of deliberate violations through fraudulent or deceptive practices. Articles 137 and 138 distinguish investigation of suspected non-compliance from action where non-compliance is established. The competent authority must select and document the appropriate response. [23]

Method development is not a reason to suspend all investigation

Article 34 sets a hierarchy for sampling and analytical methods, including internationally recognised methods or protocols and, where appropriate, appropriately validated alternatives under the method hierarchy and meeting the Regulation's conditions. Article 37 addresses designated official laboratories and accreditation requirements, subject to the Regulation's exceptions. A useful new assay must have a defensible scope and performance; a lack of a single harmonised honey-authenticity test is not itself a general prohibition on investigating credible evidence. [23]

Authorities should obtain the original report, method/version, sample identity, laboratory status, marker interpretation and relevant performance evidence. Procedural safeguards, including the applicable right to a second expert opinion, should be respected. Method suitability and the decision to investigate are related but distinct questions. [23]

Authenticity and safety require different legal assessments

General Food Law addresses responsibility, non-misleading presentation and traceability. Its safety-related withdrawal and recall duties should not be asserted automatically for every authenticity anomaly. Proven misdescription or composition non-compliance can nevertheless require effective measures under the applicable food and official-controls rules. The response should match the established facts and legal basis. [24] [23]

CAFIA's public June 2026 notice provides an EU example of official foreign-amylase testing and announced administrative follow-up. It should be cited as the authority's stated findings and intended procedure, not as an independently verified final penalty. [27]

11 / WHAT CAN BE DONE NOW

Harmonisation and an operational buyer programme

Directive (EU) 2024/1438 requires Member States to apply the relevant implementing measures from 14 June 2026, with a transition for qualifying earlier-labelled or earlier-marketed stocks. Method-adoption acts are due by 14 June 2028; the specified delegated acts on composition, pollen and traceability are due by 14 June 2029. The latter is not a single universal implementation date. These are distinct milestones; future harmonisation work does not erase existing composition or truthfulness obligations. [26]

GHIC proposal: a defined, limited assurance pilot

The following is a proposed buyer programme, not a description of a mandatory Japanese scheme. Its scope should be agreed before testing and should cover named products, suppliers and lots rather than an undefined national origin category.

Stage	Proposed output and decision
1. Define scope	Named responsible buyer and laboratory; agreed product/lot list; risk rationale; preservation of existing official directions.
2. Control sampling	Independent or supervised representative sampling; sealed portions; traceable transport; retained material and an agreed dispute route.
3. Specify analytical questions	Map each relevant risk to suitable tests. Include foreign-enzyme confirmation where justified; retain complementary chemistry and contextual data.
4. Assess evidence	Use method-specific criteria, honey-type scope and documented uncertainty. Request relevant supplier production and traceability records.
5. Decide and implement	Record the interim product status during unresolved suspicion; implement applicable official or commercial measures when non-compliance is established.
6. Verify the response	Confirm the affected distribution, corrective action and evidence required for any subsequent release. Review recurrence and supplier performance.

A disagreement between methods should trigger comparison of their targets, versions, sensitivity, matrices and sample identity. It should not be settled by counting how many unrelated tests were negative. Equally, one unconfirmed screening anomaly should not be converted into a public allegation of deliberate fraud.

12 / REQUESTS WITH A VERIFIABLE RESULT

Recommended stakeholder actions

GHIC recommends targeted technical circulation of this public report. The requests below are proposed next steps and should not be represented as decisions already accepted by an authority, laboratory or business.

Audience	Requested action	Useful completion evidence
Japanese Council / JFRL	Clarify the current specification, confirmation rules, reference scope and available validation package.	Dated procedure or written technical response.
Japanese buyers / retail associations	State which suppliers/lots are covered and how samples and adverse findings are handled.	Acceptance protocol and aggregated implementation data.
MAFF / CAA	Clarify current JAS stage and any publicly disclosable official follow-up.	Official source, procedural status or responsible unit.
CFNA / bilateral participants	Provide the status of shared trade-quality specifications and the October meeting outputs.	Published specification, agreed minutes or explanation of remaining work.
EU and national authorities	Assess relevance for method selection, risk-based controls and international technical exchange.	Named owner, evidence needs and next decision point.
Retailers and importers	Map existing release criteria to the risks described and define a targeted pilot where gaps exist.	Written acceptance and escalation rules.
Laboratories / scientists	Compare scope and decision rules across methods using appropriate blinded reference material.	Agreed study design, performance requirements and reporting template.
Consumer / producer bodies	Communicate the evidence accurately and support properly documented market surveillance.	Source-based briefing and a practical sampling proposal.

The scheduled 15 October 2026 bilateral meeting is a timely point for requesting public implementation documents. At the report cut-off it had not taken place, so this report attributes no agreement or outcome to it. [19] [20]

13 / WHAT WOULD CHANGE THIS ASSESSMENT

Open questions and publication boundaries

The missing implementation document

The most valuable next item is a dated acceptance specification from a significant Japanese importer for Chinese honey, or an official act establishing the claimed import requirement. It should identify the covered products, sampling frequency, laboratory criteria, thresholds and confirmation procedure, as well as the consequences of failure.

Priority questions

- Which elements are contractual, recommended, legally required or still proposed?
- Are all lots covered, a risk-based subset, particular suppliers, or only selected retail products?
- Who selects and seals the sample, and how is its relationship to the shipped lot secured?
- Which analytical targets and decision rules apply to each honey type and bee species?
- What aggregated rejection and corrective-action data can be disclosed with a valid denominator?
- What is the current JAS status and what is the publicly disclosable outcome of the Council's referral?

Limitations of this report

The research is based on accessible sources at the stated cut-off. It does not include confidential buyer contracts, a complete register of tested shipments, underlying individual laboratory files for the Council's series, or a controlled evaluation of market effects. Some trade sources are interested-party accounts. English descriptions of Japanese and Chinese documents are analytical translations, not legally authoritative translations.

Publication position

GHIC supports fit-for-purpose authenticity controls, technically sound interpretation and documented action. This report neither accredits a laboratory nor certifies a product, and it makes no finding of misconduct by an individual operator.

Correction and technical response: ceo@honeyintegrity.com. Please identify the section, the proposed correction and the supporting original document. Substantive verified developments should trigger a dated revision rather than silent alteration of the record.

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