

Apalachee Beekeepers Association
6562 N. Jefferson Street
Monticello, FL 32344

American Bee Journal
Dadant
51 S 2nd Street
Hamilton, IL 62341

ATTN: Joe Graham

Dear Mr. Graham:

The header for Ms. Nancy Gentry's letter in the February 2010 issue of American Bee Journal is glaringly incorrect. The resolution presented by the Apalachee Beekeepers Association (ABA) seeks relief from Florida's food safety regulations relating to bottling (Chapter 5K-4.004, Florida Administrative Code) for certain beekeepers, **NOT** from the Florida Honey Standard (Chapter 5K-4.027, 5K-4.028 Florida Administrative Code). The Florida Honey Standard addresses what goes in the bottle, not how it gets put there.

A thorough understanding of this letter requires an historical perspective. Our resolution, which may be viewed at the ABA website (<http://sites.google.com/site/apalacheebee/>), was presented to the Florida State Beekeeping Association (FSBA), and a committee was formed to further research the issue and report back to the FSBA Board of Managers (BOM). The committee report (also available on our web site) was submitted to FSBA for consideration at the 2008 Annual meeting. The committee report recommended two possible statutory changes and a Best Management Practice for small honey producers. One statutory change would add a specific exemption from the food permit requirements for "Registered Florida beekeepers that produce, bottle and sell their own honey." This approximates the exemption granted to sellers of peanuts in the shell, parched, roasted or boiled and persons selling sugar cane or sorghum syrup. The other proposed statutory change would define honey as a raw agricultural commodity. Establishments that pack raw agricultural commodities are not included in the definition of a "food establishment" (Section 500.12(1)(a), Florida Statutes). Lastly, the committee report recommended adoption of Best Management Practices which would allow small beekeepers/honey producers to bottle or package honey in a home kitchen with common-sense restrictions or in a detached honey house. If the honey house does not have a toilet room provided, then a restroom, in a nearby home, farmstead or business can be utilized. Also, since minimal water is used for hot water washing of equipment and for warming the honey prior to packaging, this water would not fall under the classification of "wastewater," but should be disposed of in a manner that does not create an unsafe or unsanitary condition for the food establishment. Also, a portable container of potable water, such as a water cooler, could be used as the source of running water etc. Delivery of the committee report was declined by the FSBA BOM because of the pending honey standard. There is no mention anywhere in either document of an exemption from the honey standard.

One of several constitutional purposes of the ABA is to: "Promote non-Africanized honeybees and beekeeping generally and to broaden the knowledge of beekeeping and improve the beekeeping skill among its members". Recent nationwide interest in small scale farming in general and the surging interest in hobby scale beekeeping can be viewed only as a positive trend. The ABA's interest in relief from onerous, excessive and unnecessary bottling regulations was to allow those beekeepers with only a few hives to be able to recoup a portion of their expenses through sales of honey without having to spend \$20,000 to \$30,000 to build a bottling facility meeting regulatory standards.

There are enough obstacles to keeping bees without beekeepers fighting among themselves and one group spreading misinformation about what another group is trying to accomplish. All we are asking is that the same support be given to the small beekeepers seeking relief from the bottling laws that was

given by the small beekeepers to passage of the Honey Standard. It is indeed sad that the State of Florida was the first to pass a Honey Standard and at the same time lags behind other states like Mississippi and Illinois who are offering regulatory relief in support of their small beekeepers. Both ABA and other small beekeepers recognize that all beekeepers benefit when the consuming public can be assured that their honey is a safe and wholesome product.

This discussion should put to rest any further narrative or assertion that the ABA seeks exemption from the Florida Honey Standard.

Sincerely,

Charles Robert Futch, President
Apalachee Beekeepers Association