



Florida Department of Agriculture and Consumer Services  
CHARLES H. BRONSON, Commissioner  
The Capitol • Tallahassee, FL 32399-0800

Please Respond to:

March 31, 2006

Dr. Andrew von Eschenbach  
Acting Commissioner  
Food and Drug Administration  
United States Department of Health and  
Human Services  
5630 Fishers Lane, Room 161  
Rockville, Maryland 20852

**RE: Petition for Review and Adoption of Codex Alimentarius Standard for Honey  
Docket # 2006P-0101**

Dear Commissioner von Eschenbach:

On March 7, 2006, the American Beekeeping Federation, American Honey Producers Association, National Honey Packers and Dealers Association, Sioux Honey Association and the Western States Honey Packers and Dealers Association filed a petition with the U. S. Food and Drug Administration (FDA) requesting review and adoption of the Codex Alimentarius Standard for Honey as codified under 21 CFR 130.6. The Florida Department of Agriculture and Consumer Services is a strong supporter of this petition and it is my hope that you will give it your highest consideration.

Mislabeled or misbranded products bearing the word honey in the product name or front label induce consumers to purchase these products under the false belief that they are either 100% honey or contain honey as their principal sweetener. The increasing presence in the market of these misbranded products threatens the image of honey as a pure, natural and healthy sweetener. Beekeepers work extremely hard to harvest the high quality product that consumers have come to expect. FDA's adoption of a Standard of Honey will not only help guard against the negative pricing impacts that come from deceptive labeling by an inferior product but will give regulators, both FDA and state agencies, the tools they need to facilitate regulatory actions on these products, particularly in cases of adulteration or fraud.



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Florida Agriculture and Forest Products  
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Commissioner von Eschenbach  
March 31, 2006  
Page Two

The adoption of this standard will go a long way toward ensuring the viability of our domestic honey industry in the years to come. Thank you in advance for your attention to this issue. If you have any question or need any additional information, please do not hesitate to contact Dr. Joanne M. Brown of my staff at (850) 488-3022.

Sincerely,

A handwritten signature in black ink that reads "Charles H. Bronson". The signature is written in a cursive style with a large, prominent initial "C".

CHARLES H. BRONSON  
COMMISSIONER OF AGRICULTURE