



Apimondia

International Federation of Beekeepers' Associations

Apimondia Working Group number	AWG 1
Name	EU Organic legislation revision
Purpose	Improve the regulation on organic bee products
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Place of creation	Sunny Beach - Bulgaria
Scientific Commission(s) involved	Economy + Technology
Regional Commission(s) involved	Europe Commission
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Target	Organic legislation
Dead line	December 31 st , 2010
Document(s) provided	Improvements of regulations on organic farming to facilitate the practice of organic beekeeping (proposal)
Action(s) done	Discussion on the proposal to revise Organic legislation
Results	
Observation	

IMPROVEMENTS OF REGULATIONS ON ORGANIC FARMING TO FACILITATE THE PRACTICE OF ORGANIC BEEKEEPING

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INTRODUCTION

The good beekeeping practices or the principles that should be followed by all “beekeepers” are the young and productive queens, the ensure of pollen and nectar sources for bees, the access to water, the feeding of bees when is necessary, the regular replacing of combs, the manipulating of bees with methods that cause them less stress, the leaving to the bees sufficient reserves of honey and pollen for the winter, the precaution measurements against bee diseases and the proper use of pharmaceutical products, the good handling of bee products

Good beekeeping practices should be mandatory for any one who wants to work professionally with honeybees. The way that somebody treats his bees affects also his neighbor beekeepers. Drones of low vitality, of an aggressive race, of a no-producing line, a line sensitive to diseases from a careless beekeeper may mate with, the queens of a careful beekeeper and negatively affect them. If somebody treats his colonies with antibiotics and he is careless he may cause robbing and dispersion of the antibiotics to his neighbor beekeepers. He may also disperse diseases around. If he doesn't provide his bees with water, his bees will be a continuous nuisance to all of them. Some people start beekeeping with motivation other than the love, the passion and the respect to bees. Very often they getting disappointed and they abandon their bees which become sources of diseases contamination to other bees in the surrounding area.

Organic and not organic beekeeping (conventional) based on good beekeeping practices ensure healthy bees, good quality and safe products for the consumers.

Organic beekeeping differs from conventional beekeeping in that it follows certain rules, has certain restrictions and needs certification from authorities and control bodies. The major restrictions are the placing of the apiaries, the substances that are used to control bee diseases, the replacing of combs during conversion period and what and when is allowed to feed the bees. There are also other restrictions not so important like the forbiddance of not clipping the wings of the queens, not destroying drone brood or not extracting honey from brood combs.

The current Council Regulation (EC) No 834/2007, on organic production and labelling of organic products and the Commission Regulation (EC) No 889/2008 which lays down rules for the implementation of Council Regulation, contain obscureness and restrictions that need to be clarified or amended to further improve and encourage beekeepers to practice organic beekeeping.

THE SITING OF THE APIARIES

The siting of the apiaries is one of the most important requirements for organic beekeeping. According to article 13 of Reg. 889/2008, “ *The member states may designate regions or areas where beekeeping complying with organic production rules is not practicable*”. This “may” of the regulation allow the country authorities alternatives solutions. As a matter of fact, in very few countries, if any, authorities issued a map or have designated areas where organic beekeeping could not be practicing. The alternative solution is given by article 78 that states:

*“Where no areas are identified by the member states, the beekeeper shall provide the control authority or control body appropriate documentation and evidences including suitable analyses that the areas meet the **conditions** required by the regulation”*.

The “may” becomes now “shall” and the general “designate regions” becomes “*appropriate documentation and evidences including suitable analyses*”. But yet the provisions of the regulation say nothing about what documentation, what evidences or what analyses beekeepers should provide to the authorities although these requirements are substantial for further practicing of organic beekeeping

Study further the regulations regarding the places where organic apiaries should be situated, we recall article 13 which says *“The siting of the apiaries shall be such that, within a radius of 3 Km from the apiary site, nectar and pollen sources consist essentially of organically produced crops and/or spontaneous vegetation and/or crops treated with low environmental impact methods which cannot affect the qualification of beekeeping production as being organic”*.

Even in this case the regulation doesn't say how to qualify the beekeeping production as organic? Of course, one could easily say that organic production is that production that is free from contamination of agrochemicals that are used in areas where bees forage. In other words bee products should not have detectable amounts of pesticides, herbicides, fungicides or other chemicals that are used in crops within a radius of 3 Km.

But still this is not clear. Different labs have different detectable limits depending on their instrument they have. Some labs have more sophisticated equipment than others and can detect residues in lower levels. In some countries inspection authorities examine only honey and in some others they examine also wax, pollen and propolis. We do know that there are big differences between wax and honey regarding residues. Laws and regulations should be explicit, definite, clear and applicable to everyone in the same way and this regulation is not, at least not in this case.

If we accept residues as qualification criterion of organic product, then the question remaining is what is the meaning of the restrictions of a radius of 3 km. Pesticides may be transferred thru the air in shorter or longer distances and contaminate bee plants and bee products or may not cause any contamination. What mainly matters is what the bees transfer in their hive and this is the measurable criteria rather than the distance from certain plants or contamination sources.

So, after the above considerations we propose to adopt the provision of article 14.b of Reg 834/2007 as sufficient which says *“Apiaries shall be kept at sufficient distance from sources that may lead to the contamination of beekeeping products or to the poor health of the bees”*. By this provision, regulation should also consider the contamination from other sources as well, like motorways, Industrial areas, waste dumps, etc that are not considered by Reg. 889/2008. In addition to the above amendment it should be defined what is the meaning of “contaminated bee product”.

Regarding article 78 of Reg. 889/2008, who is going to provide the evidences and the appropriate documentation is not important but what would be the evidences matters. This unclarity should be solved to make the regulation applicable to everyone in the same way

DISEASE PREVENTION AND VETERINARY TREATMENT IN ORGANIC BEEKEEPING

Regarding the bee diseases and their control we should take in mind that all animals of the planet may get sick and all sick animals are eligible for pharmaceutical treatments. Bees are the exception of the above rule. When they sicken they are not eligible for any pharmaceutical treatment and the beekeeper must either find ways to control the diseases without drugs or destroy the diseased colony by fire. This is not because residues in hive products are dangerous for human health but because the pharmaceutical companies did not apply for MRLs of products regarding beekeeping industry as demanded by European Medicinal Evaluation Agency (EMA). After this the regulation 2377/99 and the most recent 37/2010 actually bans all veterinary drugs that had been used in beekeeping. Varroacides were excluded. Compounds like coumaphos, fluvalinate, amitraz and others have been approved before the establishment of EMA

So, actually, in this case, organic beekeeping differs from conventional beekeeping by what the beekeepers used to control varroa mites. Today there are many and effective compounds that can be used in organic beekeeping. Indeed, a lot of conventional beekeepers turn to thymol, oxalic acid, formic acid and lactic acid to control varroa because synthetic acaricides are not any longer effective against Varroa.

Although, everything is clear with bee diseases and the only restriction that should have been adopted is the use of organic products instead of chemical ones against varroa the paragraphs 4 of article 25 of Reg 889/2008 says the following

Paragraph 4 “if despite all preventive measures, the colonies become sick or infested, they shall be treated immediately.....”.

Treating disease animals immediately may be necessary for other animals but not for bees. Bee diseases cannot be eradicated from the hives. Beekeepers may find bee diseases in their colonies at any time, but this doesn't mean that they should treat their hives immediately. The strategy is to treat the bees with certain compounds and in certain time to keep the infestation at non-damaging levels. This is the reason why scientists have been studying economic threshold for Varroa. The meaning of this threshold is to treat a colony only when the mite population reaches a level at which mites are still tolerable by bees but above which there may be serious irreparable harm to the colony. So this “immediately” treatment of disease bee colonies is unnecessary and should be deleted. Paragraph 7 of the same article that gives the organic beekeepers the right to apply chemically synthesised allopathic products against bee diseases should be also dropped. Today, there are plenty and effective organic products that can be used to control Varroa. There isn't any reason to open a window to chemicals while the motto of organic farming is “as natural as we can”

THE CONVERSION PERIOD AND THE CHANGING OF THE COMBS

According to article 38 “*Beekeeping products can be sold with references to the organic production method only when the organic production rules have been complied with for at least one year. During the conversion period the wax shall be replaced with wax coming from organic beekeeping*”.

There are two methods of replacing of the combs of the colonies. Gradual replacement where combs are replaced gradually within one or more years and direct complete replacement where all combs of a colony are replaced at once. Gradual replacement results to residues in new combs, because of the translocation of residues from contaminated combs to the new ones. This possibility significantly decreases in direct replacement method. In

The time and the method of combs replacing depends mainly on the demands of the control bodies which, at some countries, do not show much consideration and this subsequently results in residues in bee products from previous treatments

So our proposal for amendment to Reg. regarding the conversion period is that “Beekeeping products can be sold with references to the organic production method only when the organic production rules have been complied with for at least 12 months, all combs have be replaced and their product do not content residues in detectable levels”. What is detectable level has to be defined.

FEEDING THE BEES

Paragraph of article 19 says that “*The feeding of bee colonies shall only be permitted where the survival of the hives is endangered due to climatic conditions and only between the last honey harvest and 15 days before the start of the next nectar or honeydew flow period. Feeding shall be with organic honey, organic sugar syrup, or organic sugar.*”

Bees beside sugars need also proteins and this regulation takes no consideration about it. Pollen is also important for the survival of the bees and an amendments regarding the provision of pollen or pollen substitutes in periods of lack is necessary. It is also necessary to allow feeding the bees with syrup during the conversion period especially when beekeepers replace all their combs at once (direct method). To do this bees need to be fed with syrup.

CONCLUTIONS

1. Good beekeeping practices should be mandatory for both conventional and organic beekeepers

There isn't any provision in organic beekeeping regarding the distance of the careless beekeepers and the adoption of good beekeeping practices from all beekeepers organic or not organic is more than necessary.

Article 13. The siting of the apiaries from the contamination sources. The distance of radius of three Km from the hives should be ignored and instead that use certain level of honey, wax or other bee products' contamination. Article 14b of Reg 834/2007 which says “*Apiaries shall be kept at sufficient distance from*

sources that may lead to the contamination of beekeeping products or to the poor health of the bees” is sufficient for practicing organic beekeeping.

Article 25 Specific rules on disease prevention. Delete the paragraph 4 that tell the beekeepers to treat their colonies immediately when a disease is present in a hive, and paragraph 7 that permits the use of allopathic synthetic products as alternative solution

Article 38 Conversion period: Control bodies should insist in those methods of replacing of conventional combs that leave no residues in the new ones. Beekeepers should offer their product as organic only after replacing all combs and have no detectable amount (needs to be defined) of residues in wax

Article 19. Feeding: Provision should be included, regarding proteinaceous diet (pollen or pollen substitutes) in periods of lack and feeding bees to replace their combs during the provision period.