

## ROADMAP

Title of the initiative: Commission **Communication on bee health in the EU**  
Type of initiative (CWP/Catalogue/Comitology):  
Lead DG: SANCO Unit D1  
Expected date of adoption of the initiative (month/year): 12/2010  
Date of modification: September 2010  
Version No: 2

### Initial IA screening & planning of further work

#### **A. Context and problem definition**

(i) What is the political context of the initiative? (ii) How does this initiative relate to past and possible future initiatives, and to other EU policies?

The SANCO-led recent Commission Communications on the new EU Animal Health Strategy and its subsequent Action Plan<sup>1</sup> place greater emphasis on the concept that "Prevention is better than cure" in the area of animal health. Neither contain initiatives specific to bees but they contain several initiatives which are or can be relevant to beekeeping and bee health (e.g. an EU Animal Health Law, categorisation of diseases and prioritisation of EU intervention, improvement of EU reference laboratories etc.).

Subsequent to these Communications stakeholders expect that Commission Services are not only more pro-active in identifying problems in partnership with the stakeholders, but also increasingly take into account the specific needs of particular sectors and also to communicate better on those considerations. Stakeholders from the area of beekeeping have recently mentioned that recent actions (such as bee-specific discussions at the Animal Health Advisory Committee and other fora, a thematic workshop on bee health organised by the European Medicines Agency, EMA etc.) have gone in the right direction but that additional work needs to be done in the area of bee health and related fields. In particular there is an apparent need to work even more closely with stakeholders to better identify problems and also reach them with certain messages.

The Commission Services have been receiving numerous correspondence from the bee related industry associations, Members of the European Parliament and beekeepers asking the Commission for actions to investigate further and address the problems.

In addition, in November 2008, the European Parliament issued a resolution on the situation in the beekeeping sector<sup>2</sup> which called on the Commission to carry out specific actions and to ensure that these were coordinated.

This initiative ties well with many cross-cutting issues identified by a recent SANCO exercise on Future challenges for EU health and consumer policies<sup>3</sup> (better governance, sustainability, building consumer confidence, food security, efficient use of available knowledge, creation of European-wide networks etc.).

The initiative will cover a number of issues such as bee health, residues in honey and the use of veterinary medicines to treat bees where SANCO leads, and also issues led by other Commission Services. To ensure co-ordination, an Inter-service Group on bees has been created, led by SANCO (see also point C below).

<sup>1</sup> COM(2007)539 final and COM(2008)545 final, respectively

<sup>2</sup> B6-0579/2008

<sup>3</sup> [http://ec.europa.eu/dgs/health\\_consumer/events/future\\_challenges\\_en.htm](http://ec.europa.eu/dgs/health_consumer/events/future_challenges_en.htm)

As regards the wider Commission strategy, on March 3rd 2010 the Commission adopted its overarching strategy "Europe 2020: A strategy for smart, sustainable and inclusive growth" (COM(2010) 2020). This initiative is in line with the those three key priorities in particular as it promotes knowledge, partnerships and strengthen links between education, business, research and innovation in the bee sector with a great number of SMEs. In addition, the better use of the actual initiatives to be explained in the Communication are expected to assist the whole EU and the operators in fighting environmental degradation, biodiversity loss on this particular area with ramifications to the bigger picture of pollination and agricultural (plant) production in EU.

What are the main problems identified?

In recent years, there have been reports of increased mortality in bees in the EU and elsewhere. Although this has caused serious concern all over the world, scientific studies have not been able to determine the exact cause or the extent of these increased mortalities. A recent EFSA study "Bee mortality and bee surveillance in Europe"<sup>4</sup> published in December 2009 suggests that the cause is multifactorial. Factors that have been considered are bee diseases and pests, pesticide poisoning, stress linked to changes in nutrition and climatic conditions.

The Commission has launched a number of initiatives to address the specific concerns of the beekeeping sector (for instance the creation of an integrated website on bee issues, start of a procedure to appoint a bee health EU reference laboratory, EU training for veterinary officials on bee health etc.) but these need to be publicised to and fully exploited by stakeholders to have the most beneficial effects.

Several bee-specific EU research initiatives are also ongoing and expected to provide more understanding on certain elements affecting bee health in the future.

Other ongoing or planned actions (such as the review of Directive 2001/82/EC on veterinary medicinal products) are not specific to bee health but have the potential to solve some of the problems of the sector (e.g. little availability of authorised veterinary medicines for bees) but only if they are properly understood, evaluated and followed-up and exploited by the stakeholders in the beekeeping or related (e.g. veterinary medicines producing) sectors.

Because no direct causal link between the increased bee mortalities and specific substances or agents, has been established, it remains unclear which action would be effective and whether additional actions are necessary.

Beekeeping involves different sectors in the EU (such as honey production, the pollination of agricultural crops, biodiversity, and rural development). Initiatives taken would have thus to be explained in a holistic approach considering cross-cutting actions and the need for coordinated action.

Who is affected?

Primarily the bee keeping industry and the bee keepers themselves. In a wider context producers of agricultural crops which rely on pollination by bees, consumers of honey, food industry using and processing honey, producers of certain veterinary medicines, official and private veterinarians can be affected.

(i) Is EU action justified on grounds of subsidiarity?

Yes. Bee diseases and the colony collapse disorder of bees do not respect borders, therefore general rules (if necessary) and other arrangements for their control should be harmonised across the EU. Similarly, information pertaining to bee health in general, such as effects of pesticides on bees, certain food safety concerns due to residues in honey for human consumption or implications in pollination of plants are all of cross-border nature and should be dealt with at EU level.

---

<sup>4</sup> [www.efsa.europa.eu/en/scdocs/scdoc/27e.htm](http://www.efsa.europa.eu/en/scdocs/scdoc/27e.htm)

(ii) Why can the objectives of the proposed action not be achieved sufficiently by Member States (necessity test)?

They are related to the fight against animal diseases with major cross-border implications and impact on the internal market of animals and animal products, including food of animal origin. They are also related to collect, explain and synthesise information from several areas, on various initiatives and indeed some of those not (or not fully) completed yet. On those areas the Commission, both as initiator of future legislation and implementing existing ones are best placed to act. Follow-up wide stakeholder consultation also can be best achieved by EU action.

(iii) As a result of this, can objectives be better achieved by action by the Community (test of EU Value Added)?

Yes

## **B. Objectives of EU initiative**

What are the main policy objectives?

1. As a follow up and complementing the EU Animal Health Strategy, to establish common understanding (and if possible agreement) across the EU on the area of bee health. In particular:
  - to increase awareness of Commission (EU) actions by EU bee keepers
  - bring these closer to bee keepers by communicating to them directly and in all EU languages not via proxies (organisations),
  - Clarify and guide what the bee keepers, business operators themselves could/should do in order to succeed under the EU framework.
2. To provide a comprehensive document to serve as a basis for discussion and further reflections
3. To give a possibility to stakeholders to comment on these initiatives in a structured manner and thereby assist the further identification of still existing problems, gaps and bottlenecks with the view to foster further agreements on the ways to tackle the identified problems.

Do the objectives imply developing EU policy in new areas or in areas of strategic importance?

No

## **C. Options**

(i) What are the policy options?

- Do nothing: while the recent, already ongoing and already planned initiatives are expected to be beneficial, ignorance of them can significantly reduce their expected or potential benefits.
- Commission Staff Working Paper: in addition to the "do nothing" option this would provide a good overview but would risk to remain at the technical and expert level. Given the wide cross-cutting ramifications of some of the bee health issues and the need to reach the actual bee keepers with certain messages, this may not fully meet our needs.
- Commission Communication: the preferred policy option combining all benefits of the above and adding more political weight and publicity to the subject and also direct access to all language versions by interested citizens.

(ii) What legislative or 'soft law' instruments could be considered?

Given the uncertainties and gaps in scientific data related to the problem of colony collapse disorder, currently no legislative initiatives are foreseen.

(iii) Would any legislative initiatives go beyond routine up-date of existing legislation?

no

Does the action proposed in the options cut across several policy areas or impact on action taken/planned by other Commission departments?

Yes, it cuts across several policy areas due to its nature. As such Bee issues have been discussed frequently over the last few years among various Commission Services and stakeholders bilaterally. More specifically following the creation of the Bees Inter-Service Group in 2009 multilateral talks took place. This group includes officials from DG Sanco, DG Environment, DG Research, DG Agriculture and Rural Development, DG Trade, and the Secretariat General. Meetings of the group took place on 27 November 2009 and 29 January and 23 April 2010. This initiative will explain actions already taken and planned in a co-ordinated way in a thematic document.

Explain how the options respect the proportionality principle.

All considered options are of non-regulatory nature and intend to foster further and focused discussion with the stakeholders involved.

#### **D. Initial assessment of impacts**

What are the significant impacts likely to result from each policy option (cf. list of impacts in the Impact Assessment Guidelines pages 32-37), even if these impacts would materialise only after subsequent Commission initiatives?

The expected impact is to increase the visibility of the specific actions taken by the Commission to address bee health related issues in other broader policies (e.g. Animal Health, veterinary medicines, etc.). Indirect impacts are foreseen to be positive in terms of better dissemination of knowledge and subsequently more efficient use of potential opportunities by stakeholders. There are no foreseen administrative burden implications.

Could the options have impacts on the EU-Budget (above 5 Mio €) and/or should the IA also serve as the ex-ante evaluation, required by the Financial Regulation?

no

Could the options have significant impacts on (i) simplification, (ii) administrative burden or on (iii) relations with third countries?

no

#### **E. Planning of further impact assessment work**

When will the impact assessment work start?

No impact assessment is planned for this communication-focussed initiative. However, the actions mentioned will be subject to impact assessment as appropriate during the preparation of the broader initiatives they are part of (e.g. Animal Health Law, etc.). Where relevant, these impact assessments will consider the expected impact on bees.

(i) What information and data are already available? (ii) Will this impact assessment built on already existing impact assessment work or evaluations carried out? (iii) What further information needs to be gathered? (iv) How will this be done (e.g. internally or by an external contractor) and by when? (v) What type and level of analysis will be carried out (cf. principle of proportionate analysis)?

All the data on the various planned or ongoing initiatives are already available. No further information needs to be collected or analysis done. Contrary, one of the benefits in communicating these swiftly and comprehensibly should lead to better understanding of the current situation and provide for better identification of problems and their analysis subsequently, after a wide stakeholder consultation.

Which stakeholders & experts have been/will be consulted, how and at what stage?

The last discussion of the Bee Inter-Service group was on 23 April 2010 where certain stakeholders from bee keeping industry also participated to explain their concerns.

Further consultations with wider range of stakeholders (farmers, veterinarians, EU agencies, international animal health organisations etc.) took place on 18 June in the framework of Animal Health Advisory Committee of DG SANCO.

After adoption, the Communication will form a basis for wide public stakeholder consultation.