

CC(11)4443:1

Mr Alberto Laddomada
Head of Unit
DG SANCO - Animal Health
European Commission

Brussels, 31th May 2011

Re: Position of Copa-Cogeca on the Communication from the Commission to the Council and the European Parliament on honeybee health

Dear Sir,

Following the presentation of the Commission Communication to the Council and the European Parliament on honeybee health on 6th December 2010, Copa-Cogeca has adopted its position on this communication on 20th April 2011.

Copa-Cogeca would like to share with you some of their views on this matter. Firstly, we believe that the Communication represents an important contribution towards a European bee health policy given the sharp decline in EU beekeepers and bee colonies.

Secondly, bees play an important role in maintaining biodiversity through pollination and as early indicators of loss of biodiversity and pollution. Due to its important contribution in these areas, the future of beekeeping must be safeguarded:

- good beekeeping practices should be promoted and beekeepers can contribute to a good health of their bees but some of the factors which influence bee health are beyond beekeepers' control;
- there needs to be a permanent dialogue between government representatives, health officials and beekeeping representative organisations in order to improve the knowledge on bee health. All actors should act responsible and training should be provided for to veterinarians in order to specialise in beekeeping pathologies and to beekeepers to improve their knowledge on disease prevention and control; the role of the national bee health experts could be strengthened in order to improve the monitoring on bee health;
- the health policy needs to be adapted given the endemic character of the diseases affecting bees in Europe. As far as possible a common approach should be achieved since non-harmonized health strategies exist so far;
- "prevention is better than cure" and this must be encouraged. Still, the availability of veterinary medicines for fighting varroa should be stepped up but in a way which safeguards the quality of hive products as this is very important to European consumers;

- residue thresholds should be established as quickly as possible as there are many imported hive products on the market which do not comply with EU rules;
- research projects to deal with honeybee health are also needed in the future.

More detailed considerations can be found in the Annex.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Pekka Pesonen', with a long horizontal stroke extending to the right.

Pekka Pesonen
Secretary General

MI(11)1378:5

20th April 2011

Communication from the Commission to the European Parliament and the Council on honeybee health

Position of Copa-Cogeca

Initial approach

1. The communication is an important and effective contribution towards a European bee health policy.

2. We would like to see greater attention given to certain basic elements which need to be taken into account when conducting an appropriate analysis, highlighting the specific characteristics of this zootechnical sector:

- It represents a type of farming which respects the environment, owing to the close relationship between bee colonies and their environment and the essential role they play in pollination and maintaining biodiversity;
- Bee health must be looked at in terms of the health of the bee colony and not of the individual insects;
- As bees do not metabolise many of the substances they have contact with, special measures are needed;

It is important to address pathogen and parasite problems, even if the majority of those which currently exist in Europe are impossible to eradicate. In their annual plans, beekeepers must do their utmost to fight them, by means of prophylaxis and controls.

Analysis of the Communication

3. The European beekeeping sector

- With regard to bee health, information on hive and beekeeper densities is more important than economic criteria;
- The honeybee is not a simple pollinator, but the most significant, effective and abundant pollinator;
- To ensure the sector is properly represented, the term "association" must be understood to mean "representative organisations" at European or national level.

4. What are the factors affecting bee health?

Beekeeping associations believe it is impossible to limit this to a list of general factors. It is better to be precise and define the priorities as follows:

1. Changes to the environment, including:
 - toxic agents, of which neurotoxic products and their synergists,
 - loss of plant biodiversity and
 - changing climatic conditions;

The order of this list may be different in certain countries.

2. Varroa and associated pathologies (lack of appropriate treatments and excessive cost for authorising medicines)
3. Invasive species

In addition to these priorities, other pathologies must also be monitored and controlled (such as American and European foulbrood).

5. Bees as part of the animal health framework

5.1 Existing legislation for the protection of bee health in the EU

- Compulsory disease reporting in no way reflects the reality on the ground. The status of different diseases must be reconsidered according to the endemic nature of them;
- For pathogens endemic across Europe, they should no longer be seen as diseases requiring compulsory reporting but should be subject to appropriate health monitoring;
- The conditions and certificates required for moving bee-related biological material between countries should be improved, as they currently do not serve their purpose.

5.2 Protecting bees against exotic diseases

European beekeepers would be in favour of animal health requirements applying to imported honeybees and bumblebees coming from third countries to avoid exotic bee diseases/parasites being introduced into the EU.

5.3 Animal health and bee health strategy

- It is essential for those working in the field of bee health as well as beekeeping associations to be fully involved in the development of guidance documents on bee health;
- The purpose and qualifications of technical assistants specialised in bee pathologies (names differ between countries e.g. health agents, beekeeping assistants, beekeeping technicians etc.) must be recognised at national and European level;
- On the ground, there should be continued cooperation between veterinarians and beekeeping organisations in the fight against bee colony diseases;
- Indications relating to treatments should be harmonised;
- Prophylaxis should be encouraged as it is more effective against opportunistic pathologies than administering medicines.

5.4 Need for scientific and technical knowledge about bee health

- The right balance between the different factors affecting bee colonies is essential for setting priority actions;
- Further examination of prophylactic measures against opportunistic diseases is needed, in addition to improving the availability of medicines for treating varroa;
- There are not enough statistics on the number of hives to allow colony decline to be monitored. An evaluation based on production losses should also be carried out as well as on colony decline and collapse over the course of the year;
- The surveillance programme is very important and representative organisations should be consulted during the development stages and involved in implementation. Further information should be provided on the budget available for implementation.

5.5 EU Reference Laboratory (EURL) for bee health

Beekeepers support the idea of creating a reference laboratory, but in view of the specific nature of bees, would stress that it should also cover the impact of environmental factors (including toxic agents) on bee colony health.

An adequate system of inspection should be in place to ensure appropriate health and disease epidemiology monitoring.

5.6 Improving knowledge on bee health

- The training in place is an initial step but it is still essential for permanent training to be set up for veterinarians from different regions in order to take into account the specific regional characteristics of European beekeeping;
- Appropriate training for beekeepers on prophylaxis and disease control is important.
- New research findings and technical knowledge should be disseminated amongst beekeepers.
- Permanent dialogue between government representatives, health officials and beekeeping associations is needed.

6. Availability of veterinary medicines for bees

- Medicines for fighting varroa are currently lacking. It is important to encourage:
 - registration and use of medicines against varroa which safeguard the quality of hive products and colony health;
 - registration and use of medicines against varroa according to a centralised procedure at European level;
- The other existing pathologies do not require use of medicines;
- Prophylaxis should be encouraged in order to avoid the accumulation of exogenous substances within hive components.

7. Food safety aspects (residues in honey)

- In view of the specific nature of this social insect, use of the cascade principle is greatly restricted;
- Owing to differences in the use of medicines between the European Union and the rest of the world, the Commission urgently needs to set residue thresholds (MRLs or RPAs) which take into account the market situation and proposals from the beekeeping sector (beekeepers and industry), which are fully consistent with European health policy;
- Currently there are many hive products on the market which do not conform to European rules. This is partly due to the insufficient level or lack of harmonisation of veterinary border controls (BIP) and controls on the internal market.

8. Plant protection products

- The evaluation of plant protection products must consider the extent to which active substances are toxic for colonies and not just for bees;
- A new risk assessment procedure should take into account chronic, larval and sub-lethal toxicity, possible synergies between different substances and with pathogens. This procedure should be developed in such a way that it does not limit new products from being placed on the market;
- The term “negligible exposure” must be defined on the basis of risk management, subsequent to a risk assessment;
- Accidental releases can occur because of several factors but firstly because of the shortcomings in the way application methods for new neurotoxic molecules are evaluated. Farmers must not be held responsible for accidental release when sowing treated seeds;
- Farmers, beekeepers, industry and legislators must cooperate to avoid any unwanted consequences. Constant dialogue between these actors is needed;
- Bearing in mind how sensitive bees are to their environment, we would insist upon proper use of plant protection products in all areas, with special attention to areas where insect pollination may be important, as well as cooperation between beekeepers and farmers;
- In our opinion, national surveillance programmes are urgently needed, within the framework of European standards and harmonised across the EU.

9. Protecting bees by addressing biodiversity loss

- Agri-environmental measures for supporting beekeeping should be covered under rural development;
- Programmes should be tailored as much to pollinators as to beekeepers;
- Owing to the role of bees, beekeepers and farmers must be involved in the development of the biodiversity strategy;
- The vital role played by bees must be brought to the foreground in actions aimed at maintaining biodiversity. They play a direct role, even if at the same time they also benefit from improvements to biodiversity.

10. Common Agricultural Policy and bee health

- The programme for improving the marketing and production of honey must be maintained and the percentage of cofinancing increased. It should also include coordinated action between beekeeping associations from different Member States;

- The focus on technical assistance and control of varroasis is essential as it covers aspects relating to education on health matters and technical assistance for beekeepers in the field, helping them to control the spread of pathogens. The focus on restocking is also important as it helps them to address colony decline.

11. Research

- There must be good cooperation in both basic and applied research into beekeeping, ensuring that at the same time there is no overlap in the use of funds available from the CAP and the Community budget for research and innovation (7th Framework Programme etc.);
- Research topics on bee health must focus on improving technology, prophylaxis and disease control aspects; national research programmes should also be encouraged.