

MI(09)6242:1

Mr Jean Luc Demarty
Director General
DG AGRI
Rue de la Loi, 130
1049 Brussels

Brussels, 26 October 2009

***Subject : Proposals for improvement of the Community aid scheme for
beekeeping***

Dear Mr Demarty,

I am writing you to share with your services our comments related to the implementation of Community aid scheme in the field of beekeeping. This scheme introduces the possibility for Member States to draw up national beekeeping programmes for a period of three years.

These beekeeping programmes established under the articles 105 to 110 of Council Regulation (EC) 1234/2007, are a very useful and effective measure helping to develop and improve the beekeeping sector along the EU. Therefore we are convinced that it is of utmost importance to continue their implementation in future. We also believe that the Community should further explore all the possibilities to adapt the programmes to new challenges that the beekeeping sector faces.

Based on the experience of the functioning of the current triennial programmes, the members of the Copa - Cogeca Working Party on Honey have identified some room for improvement for the next programming period. These proposals result from professional experience of our experts. You will find these proposals in the annex.

In case all our comments could not be taken into account in the framework of the current Community aid scheme under Reg. 1234/2007, we would be most willing to discuss with the representatives of the Commission other ways to put them into practice.

I would be most willing to provide you with any other additional information you might need.

Yours sincerely,



Pekka Pesonen
Secretary General

cc.: Mr Van Goethem (DG SANCO)

Comments in relation to the current EU framework on the support for beekeeping

(Council Regulation (EC) 1234/2007, Section VI, and Commission Regulation (EC) 917/2004)

1. Systematic consultation of beekeepers during the elaboration of programmes

Copa-Cogeca would like to insist that beekeepers must be imperatively consulted by European and national authorities during the elaboration of beekeeping programmes and of the related legislation. Only such a consultation can guarantee that the programmes themselves and their implementation will be really effective. Unfortunately, we often see that public funds which are intended for the beekeeping sector and which are used by public institutions in various EU countries do not take into account the needs, problems and points of view of beekeepers in real conditions. That's why national beekeeping programmes presented to the Commission for approval should systematically contain a list of consulted national beekeeping organisations. Beekeeping programmes are for beekeepers above all.

2. Technical assistance (Article 106a, Council Regulation (EC) 1234/2007):

2.1 Unfortunately, the measure of technical assistance has not been fully used in some Member States. Sometimes the budget dedicated to technical assistance is even used for other purposes as for example research or campaigns to fight health threats and problems.

The way of working with beehives has undergone certain development lately as the activity needed to adapt to new environmental conditions including climate change, modification of the flora and loss of efficiency of pharmaceutical products. This has led to a higher requirement of technical expertise and an increase in the time to be dedicated onto beehive's care.

Furthermore, in order to assure a future for the sector, it needs to be fed with new beekeepers that come into business. Therefore, there is a necessity of continuous technical training in order to reach the best production standards. Beekeepers over Europe need to be informed about the current state of play, be formed into new techniques, invest in new technologies and sector developments and be aware of all technical assistance available at the market.

The Copa-Cogeca Working Party on Honey does not agree with the use of the budget devoted to technical assistance to promote research activities. There is no doubt that research in a field like beekeeping is crucial, but it should be funded by specific community research programmes.

2.2 Introduce a new sub-measure: European platform on beekeeping

We propose that a European platform be established with the current community legislative framework (Reg. 1234/2007) and financed from the EU beekeeping budget.

Such a EU platform could boost more synergy and coordination between different actions at national level that involve different stakeholders in order to widen their scope. We strongly believe that international cooperation should be further developed and formalised. Given that bees do not respect country borders, it would be of utmost importance to facilitate the communication, information sharing and close cooperation among Member States. A European platform would join forces to tackle European wide spread problems, which are sometimes so cost intensive that would be impossible to be faced by one isolated Member State (i.e. the development of new medicaments to fight varroa, technical assistance, etc.). This platform, eventually, could be a possibility to achieve a European action on certain issues related to beekeeping.

The issues discussed in such a platform could also focus on marketing of honey, pathology evolution and monitoring at EU level, comparison of studies in different Member States and share of results of studies and field experiences.

3. Applied research programmes (Art. 106f, Council Regulation (EC) 1234/2007):

Research projects and actions funded under this article should correspond to problem faced by beekeepers in real conditions. Beekeepers should be informed about the outcome of these research projects as soon as these are published but in any case no later than 3 years after their start. Results should be widely distributed amongst beekeepers and their associations over Europe, especially when they are funded by the Community budget. This would enable to better coordinate research in beekeeping throughout Europe, avoiding overlapping projects, and would help to better set priorities for the next programming period.

4. Inclusion of a definition of all bee products:

It is of utmost importance to (further) develop the quality of European bee products, so that consumers in the EU can better benefit from a product produced on the single market with high quality standards of the European Union. In order to achieve this, a first step should be to provide in the current legislation a clear and specific definition of bee products at European level (e.g. royal jelly, pollen, wax, propolis). This definition should seek to give an identity to bee products characterised by their natural origin, biological activity and properties. Inclusion of the definitions into the legislation (e.g. 917/2004) would also avoid misunderstandings among European beekeepers and consumers and would exclude any risk of financing from the EU budget non-defined bee products.

In requesting this, we understand that not only honey but also other bee products are eligible for funding under national programmes.

5. Amending the content of Annex II of Commission Regulation 917/2007

Given that beekeeping sector is currently under severe pressure of colony bee losses and colony weaknesses (such as CCD) which undermines its efforts to improve the conditions in production and marketing of bee products and to improve its competitiveness, Copa-Cogeca requests that the list of data to be included in studies referred to in Art. 9 of Commission Regulation 917/2007 is amended. The objective is to include also data on bee losses provided that a clear definition of these losses and colony weakness is introduced at EU level. The definition shall be established taking into account ongoing international research initiatives and beekeepers' suggestions.

6. Budget:

This programme is the only community tool that beekeepers use to maintain their position in the market, helping them to better adapt to the market evolution, changes in the environment and consumer demands. The current community budget dedicated to beekeeping should be maintained and even increased given the difficult situation of the beekeeping sector and the challenges ahead (e.g. repeated bee losses or climate change).

For many Member States, it is difficult to draft the three-year apiculture programme referred to in Art. 1 of Commission regulation 917/2007 when, prior to this drafting they do not know the budget that will be allocated to them. The distribution of the Community budget for beekeeping programmes is based on a submission from Member States of a study that gives, among other items the number of beehives on their territory. In order to make it easier to prepare a better targeted programme for a period of three years, we suggest that the submission of the study giving an indication of the number of beehives takes place 1 year before the deadline for submission of each programme. This would allow all Member States to know their Community part-financing share in advance without changing the rules applicable under Art. 3 of Commission Regulation 917/2007.

Moreover, the Copa-Cogeca ask the Commission to consider an increase in community part-financing, from the current 50% to 75%.

ANNEX 2

General remarks regarding the approach of the EU policy makers to beekeeping issues

1. **Promotion of the image of beekeeping :**

The beekeeping sector is experiencing an aging of the beekeepers and the decline in their numbers with hardly any replacement. If there is a will to build a robust beekeeping European sector in the future, it is time to start making this production sector attractive to new people who might want to get into business. Beekeeping as an activity that respects nature, preserves flower pollination and biodiversity, gathers and develops centuries of cultural heritage and practice and also delivers to the society high quality products that enhance human health. It is very important for the sector that this image is preserved in the future, together with the idea that beekeeping is an economical activity, from which families can live on.

Therefore, we consider that the Commission services should pay due attention to the possibility of a wider communication campaign on beekeeping in the framework of common agriculture policy (CAP).

2. **Better consultation of beekeepers by policy makers**

In doing so, beekeepers' needs, problems and suggestions should be integrated in a range constantly evolving community policies. Beekeeper's knowledge represents years of experience on the field, which is an accredited input *per se*. Beekeeping must continue to be considered an essential *integral* part of agriculture and the CAP.

Therefore, we consider it is essential that Copa-Cogeca as a representative organisation of European beekeepers is systematically consulted whenever there is an intention to amend community actions in the field of agriculture, public and animal health, environment, trade, research, food chain and relevant issues dealt with by DG Enterprise. In this context, we welcome the recent creation of the Commission inter-service group and are willing to provide it with our expertise, if need be.

3. **Promotion of international meetings:**

It is essential to continue to stimulate meetings among stakeholders involved in beekeeping and marketing of bee products, in order to establish a European-wide collaboration (like for example those held in Brussels on the occasion of DG AGRI Advisory Group meetings, or ad-hoc Working Parties on beekeeping issues).

Therefore, we consider that it is essential also for the EU Commission to promote such supranational meetings with different parties involved in the sector on a more or less regular basis.

4. **Research:**

Generally speaking, research in beekeeping must be in line of the problems that beekeepers face. They should be informed about the outcome of relevant research projects as soon as these are public, especially if they are funded by community budget.

In some countries, the use by certain institutions (i.e. research institutions) of public funds aimed at beekeeping very often does not cover the needs observed at production level. As a result, the needs of beekeepers are not always addressed. Therefore, we also believe that the research dedicated to beekeeping should be more coordinated at EU level. By enhancing the communication between researchers and beekeepers or other stakeholders, a much more efficient use of research funding could be achieved.

Given the above, we ask for an inclusion of beekeeping related research into the 7th Framework Programme of the community, with special attention to applied research, in particular in bee disease prevention and treatment, availability of veterinary medicines for bees, new improved methods to test the effect of plant protection products on bees, socio-economic impacts of beekeeping, etc.

5. Data collection and statistics on bee decline:

The EU beekeeping production sector demands the inclusion of quantitative data on bee colony population and bee losses (the latter is especially important to keep track of the decline of bee colonies) in public databases and EU statistical surveys and publications. In this process, beekeepers are ready to cooperate and contribute with the figures they can provide, in particular on beehive population or any other data that might help at bringing light to the disastrous phenomena which affects their bee colonies.

Furthermore, there is a need to develop the implementation of innovative and specific statistical indexes or variables that could be used as detectors of critical situations of the EU bee population.