

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 4a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

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GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS: (SECTIONS ON BEES AND ON ADDITIVES) (ALINORM 01/22, APPENDIX IV)

GOVERNMENT COMMENTS AT STEP 6

COMMENTS FROM:

CHILE
DENMARK
FRANCE
NEW ZEALAND
EUROPEAN COMMUNITY

DRAFT GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS : (SECTIONS ON BEES AND ON ADDITIVES)

(ALINORM 01/22A, APPENDIX IV) - GOVERNMENT COMMENTS AT STEP 6

CHILE:

The Government of CHILE has the following comments on Appendix IV of ALINORM 01/22. We propose to incorporate the parts in bold underlining and to eliminate the words indicated by ~~strikeout~~.

DRAFT GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS (LIVESTOCK and LIVESTOCK PRODUCTS) (At Step 6 of the Procedure)

ANNEX 1, B: Livestock and livestock products

Species Specific Requirements

Bees

54. Hives for beekeeping should be placed in:

- i) areas where cultivated or spontaneous vegetation comply with the rules of production as set out in Section 4 of these guidelines, or
- ii) areas designated by the inspection/certification body and which meet the conditions for organic production.

Notwithstanding the aforementioned, beekeeping operations whose objective is organic apicultural production must have boundaries at a minimum distance of three kilometres from conventional crops or areas subject to contamination; this requisite also applies to cases of relocation. Organic production and conventional production are not permitted in the same apiary.

55. Feeding of bee colonies where conditions require reserves to be built up for winter may be undertaken. Feeding must be carried out between the last honey harvest and the period of dormancy of the colony. Feeding should ~~preferably~~ include organic honey, ~~or~~ organic sugar syrup, **organic pollen or organic molasses**.

- Where unavailable, or in cases of extreme climatic or other extenuating circumstances, feed not satisfying these guidelines may be used, **but only when these circumstances are authorized by the inspection/certification body**.

56. The health of bee colonies should be maintained by good agricultural practice. This includes:

- i) the use of hardy breeds that adapt well to the local conditions;
- ii) regular renewal of queen bees;
- iii) regular cleaning and disinfection of equipment, **which can only be carried out with the products and materials included in Annex A**;
- iv) destruction of contaminated materials;
- v) regular renewal of beeswax; and
- vi) availability in hives of sufficient pollen and honey;
- vii) in cases of disease, the practices described in Annex A must be carried out.

In addition, specifications are proposed for certification of organic production of the following apicultural products:

Honey

Honey must come from bee colonies raised according to the specifications of these guidelines. Disoperulation must be carried out at a temperature no greater than 35°C throughout the process. Extraction and storage of honey must be done in stainless steel or wooden containers and metal catch basins covered with beeswax; containers made of plastic, galvanized or tin-plated material cannot be used.

Pollen

Pollen must be obtained from bee colonies raised according to the specifications of these guidelines. Drying must be carried out by using indirect sources of heat that must not exceed 35°C. Pollen must be kept in airtight, preferably dark, containers in dry and well ventilated locations.

Royal jelly

Royal jelly must be extracted from bee colonies raised according to the specifications of these guidelines. Royal cells must be made of beeswax or covered with beeswax if they are artificial. Feeding of bee colonies must be carried out with organic honey, and honey substitutes cannot be used for stimulation.

ANNEX A

1- Materials and procedures permitted for the control of epidemics and diseases that affect beekeeping

- Isolating queen bees to temporarily stop the laying of eggs
- Capture by means chemical attractants
- Capture of varroa mites
- Raising drones and taking away their bee frames while they are being operculated
- Destroying colonies and bee frames that are too affected
- Choosing an adequate location for the beehives
- Sugar syrup infused with medicinal plants
- Parasites and parasitoids
- Renewal of beeswax
- Renewal of queen bees
- Selecting resistant strains
- Natural therapies such as phytotherapy, aromatherapy, homeopathy, isopathy
- Formic acid treatments
- Lactic acid treatments
- Copper treatment
- Ether treatment
- Rotenone treatment
- Vinegar
- Others treatments authorized by the Regulatory Authority

2. Restricted materials for the control of diseases that affect beekeeping

- Rotenone, use restricted because of toxicity to fish species

3. Prohibited materials for the control of diseases that affect beekeeping

- Carbon tetrachloride
- Products of synthetic chemical origin

DENMARK:

The Danish Veterinary and Food Administration has the following comments.

Annex 2. Permitted substances for the production of organic foods

Table 3. Ingredients of non-agricultural origin referred to in Section 3 of these guidelines.

In the draft only 3 additives for meat products are mentioned in Table 3. We are very much in favour, that nitrite is not mentioned, and therefore not allowed in organic products. In general Denmark finds that the list should be as short and restrictive as possible.

The original table 3, so far only covering products of plant origin, includes numerous additives, for which there are no specific conditions, as well as some additives, which may be used in milk products only. If specific conditions for the use of presently included additives are not introduced, these additives will all be allowed for use in products derived from livestock production, when the two documents are merged.

A solution to this problem could be that for some additives there should be added “only for plant products” under specific conditions. Furthermore we suggest a deletion of 414 Alginic acid and 509 Calcium chloride. We will suggest that 325 sodium lactate is included in Table 3.

Denmark therefore suggests that Table 3 (3.1) is changed as follows. The suggested derogations are underlined.

TABLE 3: INGREDIENTS OF NON AGRICULTURAL ORIGIN REFERRED TO IN SECTION 3 OF THESE GUIDELINES

3.1 Food additives, including carriers

INT	NAME	SPECIFIC CONDITIONS
170	Calcium carbonates	<u>Plant products</u>
220	Sulphur dioxide	Wine products
270	Lactic acid	Fermented vegetable products
290	Carbon dioxide	---
296	Malic acid	<u>Plant product</u>
300	Ascorbic acid	If not available in natural form, <u>plant products</u>

Tocopherols, mixed natural

	concentrates	<u>Plant products</u>
322	Lecithin	Obtained without the use of bleaches and organic solvents, <u>plant products</u>
<u>325</u>	<u>Sodium lactate</u>	<u>Livestock products</u>
330	Citric acid	Fruit and vegetable products
331	Sodium citrates	Meat products
332	Potassium citrates	Meat products
333	Calcium citrates	Meat products
335	Sodium tartrate	cakes/confectionery
336	Potassium tartrate	cereals/cakes/confectionary
341i	Mono calcium phosphate	only for raising flour
400	Alginic acid	<u>Plant products</u>
401	Sodium alginate	<u>Plant products</u>
402	Potassium alginate	<u>Plant products</u>
406	Agar	---
407	Carageenan	---
410	Locust bean gum	---
412	Guar gum	---
413	Tragacanth gum	<u>Plant products</u>
414	Arabic gum	<u>Milk</u> , fat and confectionery products
415	Xanthan gum	Fat products, fruit and vegetables, cakes & biscuits, salads
416	Karaya gum	<u>Plant products</u>

440	Pectin's (unmodified)	---
500	Sodium carbonates	Cakes & biscuits, confectionery
501	Potassium carbonates	Cereals/cakes & biscuits/confectionery
503	Ammonium carbonates	<u>Plant products</u>
504	Magnesium carbonates	<u>Plant products</u>
508	Potassium chloride	Vegetables/canned fruit frozen fruit and Vegetables, vegetable sauces/ketchup and mustard
509	Calcium chloride	<u>Milk products</u> /fat products/fruits and vegetables/soybean products
511	Magnesium chloride	Soy bean products
516	Calcium sulphate	Cakes & biscuits/soy bean products/bakers yeast. Carrier
524	Sodium hydroxide	Cereal products
938	Argon	<u>Plant products</u>
941	Nitrogen	---
948	Oxygen	---

Denmark is concerned about the use of flavourings mentioned in point 3.2. We find it unnecessary to allow the use of flavourings in products derived from livestock production, even if the flavourings are natural.

Table 4. Processing additives, which may be used for the preparation of products of agricultural origin, referred to in section 3 of these guidelines.

Table 4 is not mentioned in the draft, but in our opinion none of the processing aids mentioned in Table 4 should be allowed in products derived from livestock production, apart from water and sodium chloride. Adding "only for plant products" would be a solution.

FRANCE:

Proposals made by the French delegation to the 2001 CCFL Committee, Comments section on the French version of the draft comments pertaining to EU document SN 4847/1/99 rev 1 of December 22, 1999.

Draft guidelines for the production, processing, labelling and marketing of organically produced foods, LIVESTOCK and LIVESTOCK products

BEEKEEPING AND PREPARATION OF ANIMAL FOOD PRODUCTS

(Draft at step 6 of the procedure and is to be discussed in Ottawa in April-May 2001)

Item A – Proposed provisions regarding bees and beehive products:

The chapter "Specific Requirements According to Species, BEEES" should be replaced by the following chapter:

BEEKEEPING

1. General Principles

1.1 Beekeeping is an important activity that contributes to the protection of the environment and agroforestry production thanks to the pollinating action of bees.

1.2. The identification of beekeeping products as being organic is linked to the characteristics of the processes applied to the beehives and to the quality of the environment. This definition of agricultural products also depends on the conditions for the extraction, processing and storage of beekeeping products.

1.3. When an operator operates several beehive units in the same zone, all units must comply with the provisions contained in these guidelines. In modification of this principle, an operator can operate units that are not compliant with the provisions of these guidelines as long as they comply with all its stipulations, with the exception of those included in item 4.2 regarding beehive location. In that case, the product cannot be sold making reference to organic production.

2. Conversion Period

2.1. Beehive products cannot be sold making reference to organic production if the provisions set in these guidelines have not been complied with for at least a year. During the conversion period, the beeswax must be replaced in compliance with the requirements listed in item 8.3.

3. Origin of the Bees

3.1. When choosing the species, certain factors must be taken into consideration such as the abilities of the animals to adapt to the environment, their vitality and their resistance to disease.

3.2. Beehives must be composed of divided colonies or result from the purchase of swarms or beehives satisfying the provisions of these guidelines.

3.3. As a first modification, subject to the prerequisite agreement of the control authority or organization, beehives existing in the production unit that do not comply with the provisions of the present guidelines can be converted.

3.4. As a second modification, swarms can be purchased from beekeepers that are not producing in compliance with the present guidelines for a transition period of three years, subject to the conversion period.

3.5. As a third modification, the reconstitution of hives is authorized by the control authority or organization in the event there are no hives complying with the present guidelines or there is a high fatality rate among the animals due to disease or disaster, subject to the conversion period.

3.6. As a fourth modification, to renew the beehives, 10% of the queens and swarms not meeting the present guidelines can be integrated into the organic production unit as long as the queens and swarms are placed in hives in which the honeycombs or honeycomb foundations come from organic agriculture units. In this case, there is no conversion period.

4. Hive Location

4.1. Beekeepers must provide the control authority or organization with the appropriate documentation and justifications, including if necessary, analyses proving that the zones accessible to these colonies comply with the conditions listed in the present guidelines.

4.2. Hive locations must:

a) Guarantee that the bees have sufficient natural sources of nectar, honeydew and pollen as well as access to water;

b) Be such that, within a 3 km radius around its location, the sources of nectar and pollen are essentially composed of crops produced in accordance with organic production and/or spontaneous flora that is compliant with the provisions included in appendix I, item 9 of the present guidelines and crops that do not comply with the present guidelines but which are subjected to processes that have low impacts on the environment and which have no significant impact on the qualification as an organic beehive product (for example: permanent or temporary prairies, wet zones, forests, green fertilizer, faunistic and floristic flora fallow, clover, alfalfa pasture, ...);

c) Placed at a sufficient distance from all sources of non-agricultural production that could lead to contamination, such as: urban centres, highways, industrial areas, landfill sites, waste incinerators, etc. The control authorities or organizations establish the measures for satisfying this provision.

The above provisions do not apply in zones where there is no flowering or when the hives are hibernating.

5. Feeding

- 5.1. At the end of the production season, the hives must have sufficient honey and pollen reserves to ensure hibernation.
- 5.2. The artificial feeding of colonies is authorized when hive survival is compromised by extreme climactic conditions. The artificial feed is to be comprised of organic honey, coming preferably from the same organic agriculture unit.
- 5.3. As a first modification to the provisions of item 5.2, the official or officially recognized organization responsible for inspection/official certification can authorize the use of organic sugar syrup or molasses instead of organic honey for artificial feeding, particularly when the climactic conditions causing honey crystalization requires it.
- 5.4. The following information is to be written down in the hive registers regarding artificial feeding: product type, quantities and hives where it was used.
- 5.5. The use of products other than those indicated in item 5.3 is not authorized in beekeeping that is compliant with the present guidelines.
- 5.6. Artificial feeding can only take place during the period between the last honey harvest and fifteen days before the beginning of the following honey flow.
6. Prophylaxis and Veterinary Care
 - 6.1. In beekeeping, disease prevention is based on the following principles:
 - a) The choice of appropriate resistant races;
 - b) The application of certain practices promoting good resistance to diseases and the prevention of infections, such as the regular renewal of queens, the systematic control of hives for the detection of sanitary anomalies, the control of worker eggs in the hives, the regular disinfection of material and equipment, the destruction of contaminated materials or sources, the regular renewal of beeswax and the composition of sufficient pollen and honey reserves in the hives.
 - 6.2. If, despite all the preventive measures mentioned above, the colonies become sick or infested, they must be treated immediately and, if necessary, the colonies can be placed in isolation hives.
 - 6.3. The use of veterinary drugs in beekeeping, in compliance with the present guidelines, must respect the following principles:
 - a) They can be used insofar as the use is authorized in the member country;
 - b) Systemic compounds and homeopathic products must be used preferably over synthetic allopathic products, as long as they have a real therapeutic effect on the disease;
 - c) If the products mentioned above are ineffective or risk being so in eradicating a disease or an infestation susceptible of destroying the colonies, synthetic chemical allopathic drugs can be used under the direction of a veterinarian or other persons authorized by the member country and without prejudice to the principals listed in items a) and b);
 - d) The use of synthetic chemical allopathic drugs for preventive treatments is prohibited;
 - e) Without prejudicing the principle targeted in item a), the use of formic, lactic, acetic and oxalic acids and the following substance: menthol, thymol, eucalyptol or camphor can be authorized in cases of *Varroa jacobsoni* infestations.
 - 6.4. In addition to the above principles, veterinary care or the treatment of hives, honeycombs, etc. required by national laws are authorized.
 - 6.5. If a treatment is administered with synthetic chemical allopathic drugs, the treated colonies must be placed in isolation hives during the period of care and all the beeswax must be replaced by beeswax meeting the provisions of the present guidelines. In those cases, the one-year conversion period is applied to the colonies.

6.6. The requirements listed in the previous item do not apply to the products targeted in item 6.3 e).

6.7. When veterinary drugs must be used, it is necessary to clearly indicate the type of product (by specifying the active principles involved) as well as the details of the diagnosis, the dosage, the means of administration, the length of treatment as well as the legal waiting period; this information must be sent to the control organization or authority before the products are marketed as being organic products.

7. Raising and Identification Management

7.1. The destruction of bees in the honeycombs as a method connected with harvesting beekeeping products is prohibited.

7.2. Any mutilation such as clipping the wings of the queens is prohibited.

7.3. The replacement of queens through the elimination of the old queen is authorized.

7.4. The elimination of the worker eggs is only authorized in order to limit a *Varroa jacobsoni* infestation.

7.5. The use of synthetic chemical repellents is prohibited during honey extraction operations.

7.6. The hive location zone must be registered along with the hive identification. The official or officially recognized control organization must be informed within a timeframe agreed upon with the control authority or organization.

7.7. Particular attention must be given to guaranteeing the implementation of appropriate operations for the extraction, processing and storage of beekeeping products. All measures taken to comply with the provisions must be recorded.

7.8. The removal of the supers and the honey extraction operations must be recorded in the hive register.

8. Characteristics of the Hives and the Materials Used in Beekeeping

8.1. Hives must be essentially composed of natural materials that present no contamination risks for the environment or beekeeping products.

8.2. With the exception of products targeted in item 6.3 e), only natural substances such as propolis wax and vegetable oils can be used inside the hives.

8.3. Beeswax earmarked for new frames must come from organic units. As a modification, particularly in the case of new facilities or during the conversion period, the control authority or organization can authorize the use of beeswax that has not been produced in such units as the result of exceptional circumstances when it is impossible to find organic beeswax on the market and as long as the conventional beeswax comes from cell operculum.

8.4. The use of honeycombs containing eggs for honey extraction is prohibited.

8.5. For the protection of material (frames, hives, honeycombs), notably against pests, only appropriate products listed in appendix II, section B. 2, are authorized.

8.6. Physical treatments, such as steam or flames, are authorized.

8.7. For the cleaning and disinfection of material, buildings, equipment and tools as well as products used in beekeeping, only the appropriate substances listed in appendix II, section E, are authorized.

Item B: Proposed provisions regarding the consecutive changes proposed in Appendix 3:

MINIMAL INSPECTION PROVISIONS AND PRECAUTIONARY MEASURES INCLUDED WITHIN THE INSPECTION AND CERTIFICATION SYSTEM FRAMEWORK

Appendix 3 should be modified as follows:

1 ° Modification:

The title of section A is replaced with “A.1 Vegetables and Vegetable Products from Agricultural Production or Harvesting”.

2 ° Modification:

Items 5 and 11 are to be completed with the following elements:

5. Each year, before the date indicated by the inspection organization, operators must notify the official or officially recognized inspection/certification organization of their vegetable or **livestock** products, detailed with respect to the parcels/**herds, batches or hives.**

11. When operators have several production units in the same region (parallel crops), the units producing crops, vegetable products, **livestock and livestock products** that are not included in Section 1 should also be made the subject of inspection provisions in relation to the subjects treated in subparagraphs 4, 6 and 7 above. Plants from varieties impossible to distinguish from those produced in the unit mentioned in subparagraph 3 above should not be planted in these units. **In these units, animals of the same species as the animals produced in the unit mentioned in subparagraph 3 above cannot be produced.**

3 ° Modification:

The following section is to be inserted:

“A.2. Livestock and Livestock Products

1. At the beginning of the implementation of a control plan for livestock productions, the producer and the control organization must establish:

- A complete description of the buildings, the grazing lands, the outdoor exercise areas, the outside courses, etc., and if necessary, the facilities for the storage, conditioning and processing of livestock, livestock products, raw materials and inputs;
- A complete description of the storage facilities for livestock effluents, a plan for the spreading of these effluents agreed upon with the control organization or authority, as well as a complete description of the areas devoted to vegetable production, and if need be, the contractual stipulations established with other agricultures for the spreading of effluents, a management plan for the organic livestock unit (notably the management of feed, reproduction, health, etc.), all the concrete measures that need to be taken within the livestock unit to ensure adherence to the present guidelines.

This description and the involved measures are indicated in a control report co-signed by the involved producer.

Moreover, this report must include a commitment from the producer to conduct operations in compliance with sections 3 and 4 and to accept, in the event of an infraction, the application of the measures indicated in section 6, paragraph 9 of the present guidelines.

2. The general control requirements included in section A.1, items 1 and 2 and items 5 to 11 for vegetables and vegetable products are applicable to livestock and livestock products.

As an amendment to these regulations, the storage of veterinary allopathic drugs and antibiotics are authorized as long as they are prescribed by a veterinarian as part of the treatments targeted in appendix 1, they are stored in a monitored area and they are included in the operation register.

3. The animals must be permanently identified with the techniques adapted to each species, individually for the large mammals, individually or in batches for fowl and smaller mammals; the system must make it possible to trace the animals at all times during the production system and to have adequate tracing for audit purposes.

4. Livestock notebooks must be created in the form of a register and remain permanently accessible at the operation's head office for the control authorities or organizations.

These notebooks, the aim of which is provide a complete description of the livestock management system, must include the following information: by species, the animal entries: source and date of entry, conversion period, identification mark, veterinary history; animal exits: age, number and weight in case of slaughtering, identification mark and destination; possible livestock losses and their justification; feeding: type of feed, including food supplements, proportion of the various ration components, periods of access to outdoor areas, periods of transhumance if there are restrictions in this area; prophylaxis, therapeutic interventions and veterinary care: date of treatment, diagnosis, nature of the treatment product, doctor's orders for veterinary care with justifications and waiting periods imposed before the marketing of the livestock products.

5. When a producer operates several livestock operations in the same region, the units producing livestock or livestock products that are not targeted in section 1 are also subject to the control plan in regards to item 1, subparagraphs 1, 2 and 3 of the present guidelines regarding livestock and livestock products as well as the provisions relating to the livestock program, livestock notebooks and the storage principles for products used in livestock raising.”

4° Modification:

The title of section B is to be replaced with the following wording:

“B. Vegetable and Livestock Product and Food Preparation Units Containing Vegetable and Animal Products.”

This chapter must be completed with specific provisions regarding livestock and livestock products:

The identification of livestock and their products must be ensured at all stages of production, preparation, transportation and marketing, individual identification for mammals, by same age batches for fowl.

The tracing of livestock and their products must be ensured throughout the cycle of production, processing and preparation of the livestock production unit up until the final processing and/or labelling in accordance with the provisions that were first of all validated by the certification organization.

Specific precautionary measures must be taken and previously validated by the certification organization during the transportation and storage as well as in the preparation units to avoid crossed contamination and pollution and to ensure the tracing of organic livestock product.

Item C: Proposed provisions regarding food product preparation:

TABLE 3: NON-AGRICULTURAL INGREDIENTS MENTIONED IN SECTION 3 OF THE FOLLOWING GUIDELINES

- For the preparation of animal foods, in list 3.1. food additives, including the supports, the following substances and/or instructions for use must be added:

E 153 Vegetable carbon (ash)	Cheeses
E 160 b Rocou	Matured cheeses and dairy deserts
E 220 Sulphur dioxide	Wine products, candied, brined and dried fruit, mead
E 250 Sodium nitrite	Butcher shop and salted products
E 252 Saltpetre (sodium nitrite)	Butcher shop and salted products

E 301 Sodium ascorbate	Meat products
E 331 Sodium citrate	Meat products
E 332 Calcium citrate	Meat products
E 333 Potassium citrate	Meat products
E 334 Tartaric acid	Vegetables except raw vegetables, meat products, mead
E 422 Glycerol	Vegetable extracts (flavour carrier)
E 509 Calcium chloride	Meat products and matured cheeses
E 948 Nitric oxide (NO ₂)	Dairy products
E 1505 Tri-ethyl citrate	Dried egg whites

TABLE 4: TECHNOLOGICAL AUXILIARIES THAT CAN BE USED IN THE PREPARATION OF AGRICULTURAL PRODUCTS MENTIONED IN SECTION 3 OF THE PRESENT GUIDELINES.

- For the preparation of animal products, the following substances are added to the list of technological auxiliaries:

Oxygen

Argon

Citric acid

Regulates acidity, **cheeses obtained from whey**

Sodium hydroxide

Regulates acidity in the production of sugar **and dairy products**

Rennet

Dairy products

Beeswax

Bulking agent, **cheese crust.**

NEW ZEALAND:

The New Zealand Government would like to make the following comments:

3. Draft Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (Provisions for bees and for additives)

New Zealand believes that it would be very helpful to include a set of criteria for deciding whether an additive is organic.

Table 3 of the Draft Guidelines includes some, but not all, of the additives for the technological functions needed for dairy products. We request that the following additives, which are included in the additive lists in Codex milk product commodity standards, be added to Table 3.

For cheese:

234 nisin
260 acetic acid
270 lactic acid
330 citric acid
460 cellulose
575 GDL
phosphates

For butter:

500 sodium carbonates
524 sodium hydroxide

EUROPEAN COMMUNITY:

General comments

Following the significant progress realised in May 2000 on the development of guidelines for the organic livestock production, the E.U. would like to comment on the remaining issues concerning beekeeping on one hand and additives and processing aids in food from animal origin on the other hand.

Beekeeping:

The E.U. is of the opinion that the current text for beekeeping is not sufficiently detailed to differentiate organic beekeeping from conventional beekeeping. It has therefore introduced in the document the common E.U. rules for consideration.

Additives and processing aids

The list presented in the draft guidelines is limited to some additives for meat products. The list should consider also additives to be used in the processing of other foodstuff. The E.U. is of the opinion that the list should remain as short as possible but include substances that are essential for processing food and on the basis of duly justified technical evidence. Moreover the list of substances should be presented in order to distinguishing between additives (remaining in the end product after the process) and processing aids (used during the process but absent in the end product).

The E.U. will come back later with a proposition for a list of additives and processing aids.

Specific comments

C. BEEKEEPING

1. General principles

1.1 Beekeeping is an important activity that contributes to the protection of the environment and agricultural and forestry production through the pollination action of bees.

1.2. The qualification of beekeeping products as being from organic production is closely bound up both with the characteristic of the hives' treatments and the quality of the environment. This qualification also depends on the conditions for extraction, processing and storage of beekeeping products.

1.3. When an operator runs several beekeeping units in the same area all the units must comply with the requirements of this Guidelines. By derogation from this principle, an operator can run units not complying with this Guidelines provided that all the requirements of this Guidelines are fulfilled with the exception of the provisions laid down in paragraph 4.2 for the siting of the apiaries. In that case, the product cannot be sold with references to organic production methods.

2. Conversion period

2.1. Beekeeping products can be sold with references to the organic production method only when the provisions laid down in this Guidelines have been complied with for at least one year. During the conversion period the wax has to be replaced according to the requirements laid down in paragraph 8.3.

3. Origin of the bees

3.1. In the choice of breeds, account must be taken of the capacity of animals to adapt to local conditions, their vitality and their resistance to disease.

3.2. Apiaries must be constituted by means of the division of colonies or the acquisition of swarms or hives from units complying with the provisions laid down in these Guidelines.

3.3. By way of a first derogation, subject to the prior approval, official or officially recognised inspection/ certification body, apiaries existing in the production unit not complying with the rules of this Guidelines can be converted.

3.4. By way of a second derogation, swarms on their own may be acquired from beekeepers not producing in accordance with this Guidelines during a transitional period expiring on 24 August 2002 subject to the conversion period.

3.5. By way of a third derogation, the reconstitution of the apiaries shall be authorised by the official or officially recognised inspection/ certification body, when apiaries complying with this Guidelines are not available, in case of high mortality of animals caused by health or catastrophic circumstances, subject to the conversion period.

3.6. By way of a fourth derogation, for the renovation of the apiaries 10% per year of the queen bees and swarms not complying with this Guidelines can be incorporated into the organic-production unit provided that the queen bees and swarms are placed in hives with combs or comb foundations coming from organic-production units. In the case, the conversion period does not apply.

4. Siting of the apiaries

4.1. The beekeeper must provide the inspection authority or body with appropriate documentation and evidence, including suitable analyses if necessary, that the areas accessible to his colonies meet the conditions required in these Guidelines.

4.2. The siting of the apiaries must:

(a) ensure enough natural nectar, honeydew and pollen sources for bees and access to water;

(b) 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, according to the requirements of Annex 1, point 9 of this Guidelines, and crops not subject to the provisions of this Guidelines but treated with low environmental impact methods which cannot significantly affect the qualification of beekeeping production as being organic;

(c) maintain enough distance from any non-agricultural production sources possibly leading to contamination, for example: urban centres, motorways, industrial areas, waste dumps, waste incinerators, etc. The or bodies shall establish measures to ensure this requirement.

The above requirements do not apply to areas where flowering is not taking place, or when the hives are dormant.

5. Feed

5.1. At the end of the production season hives must be left with reserves of honey and pollen sufficiently abundant to survive the winter.

5.2. The artificial feeding of colonies is authorised where the survival of the hives is endangered due to extreme climatic conditions. Artificial feeding shall be made with organically produced honey, preferably from the same organic-production unit.

5.3. By way of a first derogation from paragraph 5.2, the official or officially recognised inspection/certification body can authorise:

1. the use of organically-produced sugar syrup, or organic sugar molasses instead of organically-produced honey in artificial feeding, in particular, when it is required by climatic conditions that provoke crystallisation of honey.
2. sugar syrup, sugar molasses and honey not covered by this guidelines for artificial feeding during a transitional period expiring on 1 July 2002.

5.5. The following information shall be entered in the register of the apiaries with regard to the use of artificial feeding: type of product, dates, quantities and hives where it is used.

5.6. Other products different from those indicated in paragraphs 5.3 cannot be used in beekeeping which complies with this Guidelines.

5.7. Artificial feeding may be carried out only between the last honey harvest and 15 days before the start of the next nectar or honeydew flow period.

6. Disease prevention and veterinary treatments

6.1. Disease prevention in beekeeping shall be based on the following principles:

(a) the selection of appropriate hardy breeds;

(b) the application of certain practices encouraging strong resistance to disease and the prevention of infections, such as: regular renewal of queen bees, systematic inspection of hives to detect any health anomalies, control of male broods in the hives, disinfecting of materials and equipment at regular intervals, destruction of contaminated material or sources, regular renewal of beeswax and sufficient reserves of pollen and honey in hives.

6.2. If despite all the above preventive measures, the colonies become sick or infested, they must be treated immediately and, if necessary, the colonies can be placed in isolation apiaries.

6.3. The use of veterinary medicinal products in beekeeping which complies with these Guidelines shall respect the following principles:

(a) they can be used in so far as the corresponding use is authorised in the Member Country.

(b) phytotherapeutic and homeopathic products shall be used in preference to allopathic products chemically synthesised, provided that their therapeutic effect is effective for the condition for which the treatment is intended;

(c) if the use of the above-mentioned products should prove or is unlikely to be effective to eradicate a disease or infestation which risks destroying colonies, allopathic chemically synthesised medicinal products may be used under the responsibility of a veterinarian, or other persons authorised by the Member country, without prejudice to the principles laid down in paragraphs (a) and (b) above;

(d) the use of allopathic chemically synthesised medicinal products for preventive treatments is prohibited;

(e) without prejudice to the principle in (a) above formic acid, lactic acid, acetic acid and oxalic acid and the following substances: menthol, thymol, eucalyptol or camphor can be used in cases of infestation with *Varroa jacobsoni*.

6.4. In addition to the above principles, veterinary treatments or treatments to hives, combs etc., which are compulsory under national legislation shall be authorised.

6.5. If a treatment is applied with chemically synthesised allopathic products, during such a period, the colonies treated must be placed in isolation apiaries and all the wax must be replaced with wax complying with the conditions laid down in this Guidelines. Subsequently, the conversion period of one year will apply to those colonies.

6.6. The requirements laid down in the previous paragraph do not apply to products mentioned in paragraph 6.3(e).

6.7. Whenever veterinary medicinal products are to be used, the type of product (including the indication of the active pharmacological substance) together with details of the diagnosis, the posology, the method of administration, the duration of the treatment and the legal withdrawal period must be recorded clearly and declared to the inspection body or authority before the products are marketed as organically produced.

7. Husbandry management practices and identification

7.1. The destruction of bees in the combs as a method associated with the harvesting of beekeeping products is prohibited.

7.2. Mutilation such as clipping the wings of queen bees is prohibited.

7.3. The replacement of the queen bees involving the killing of the old queen is permitted.

7.4. The practice of destroying the male brood is permitted only to contain the infestation with *Varroa jacobsoni*.

7.5. The use of chemical synthetic repellents is prohibited during honey extractions operations.

7.6. The zone where the apiary is situated must be registered together with the identification of the hives. The official or officially recognised inspection/ certification body must be informed of the moving of apiaries with a deadline agreed on with the inspection authority or body.

7.7. Particular care shall be taken to ensure adequate extraction, processing and storage of beekeeping products. All the measures to comply with these requirements shall be recorded.

7.8. The removals of the supers and the honey extraction operations must be entered in the register of the apiary.

8. Characteristics of hives and materials used in beekeeping

8.1. The hives must be made basically of natural materials presenting no risk of contamination to the environment or the apiculture products.

8.2. With the exception of products mentioned in paragraph 6.3(e) in the hives can be used only natural products such as propolis, wax and plant oils.

8.3. The beeswax for new foundations must come from organic production units. By way of derogation, in particular in the case of new installations or during the conversion period, bees wax not coming from such units may be authorised by the inspection authority or body in exceptional circumstances where organically produced beeswax is not available on the market and provided that it comes from the cap.

8.4. The use of combs, which contain broods, is prohibited for honey extraction.

8.5. Physical treatments such as steam or direct flame are permitted.

