



Ministerul Agriculturii Şi Dezvoltării Rurale

DIRECȚIA GENERALĂ
POLITICI AGRICOLE
Bd. Carol I nr 4, sector 3
Bucureşti, cod poştal 030163

DATE DE CONTACT
T +40(21) 307 8588
F +40(21) 307 8554
www.madr.ro

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To: Mr.Boštjan Noë

President of the European Association on Beekeeping

Dear Mr. President,

We highly appreciate your initiative regarding the protection and promotion of beekeeping in Europe and at the same time we also appreciate the contribution of European beekeepers' associations for the development and identification of viable solutions in support of the beekeeping sector.

We specify that the Ministry of Agriculture and Rural Development of Romania has the same concerns related to the aspects presented by you, and in this meaning, we can say that there has been obvious progress in the beekeeping sector in Romania, respectively:

Regarding the protection of the domestic market from non-EU counterfeit honey, we specify that Romania, through the Ministry of Agriculture and Rural Development, together with other member states, requested to the European Commission to amend art. 2, point 4 lit. (a) of Directive 110/2001 specifying the labelling of the countries of origin and indicating the percentage in descending order of the honey content in the mixture to combat fraud and ensure a fair competitive framework.

Following this approach, art. 2, point 4, lit. (a) of Directive 110/2001 was amended in the sense desired by the representative associations of the beekeeping sector by Directive (EU) 1438/2024 of the European Parliament and of the Council on May 14, 2024, with the following text:

- the country of origin where the honey was harvested is specified on the label.

If the honey comes from more than one country, the countries of origin where the honey was harvested are stated on the label in the main visual field, in descending order of their weight share, together with the percentage that each of the countries of origin represents respectively.

We also specify that the Ministry of Agriculture and Rural Development and the National Authority for Consumer Protection and the Ministry of Health, will further issue a Joint Project that will transpose the amendment of art. 2, point 4 lit. (a) in this normative act, according to Directive (EU) 1438/2024 of the European Parliament and of the Council amending Directive 110/2001.

At the same time, considering the massive imports of honey of questionable quality from Ukraine and China that entered the Romanian market in recent years at dumping prices (prices below the cost of production) and considering that the Romanian beekeepers did not have the possibility of conducting analyses through which demonstrate the quality of the honey obtained due to their high cost, the representative associations of the beekeeping sector requested to the Ministry of Agriculture to include in the Strategic Plan some "actions to support the laboratories for the analysis of bee products, bee losses or the decrease in productivity, such as and of potentially toxic substances for bees" as a measure of support and of protection for local beekeepers, thus contributing to the sustainable development of the local economy through the sale of beekeeping products.

The aim of the mentioned beekeeping intervention is to settle the physico-chemical analyses/residues that certify the quality of the honey.

Regarding the use of chemicals (pesticides) harmful for bees

Romania understands the need of the general objective to reduce pesticides and associated risks, but believes that the existence of viable alternatives must be taken into account in order to avoid that European production and EU food security are seriously affected.

Taking into account this reality, the Ministry of Agriculture and Rural Development considers that there must be a balance regarding the maintenance of an adequate phytosanitary status of plants and plant products with the objective to maintain competitiveness and food security in safe and quality conditions of the food provided to Romanian consumers, on the one hand, and the conservation of pollinating insects on the other.

Thus, the Ministry of Agriculture and Rural Development considers necessary and welcome the elaboration of measures regarding the protection of pollinators and the growth of bee colonies, taking into account the specific situations in each member state without affecting competitiveness.

In this sense, Romania, through the Ministry of Agriculture and Rural Development undertakes to reduce consumption by implementing the measures established in the National Action Plan regarding the reduction of risks associated with the use of plant protection products, aimed the protection of human health and the environment, the use of sustainable agricultural practices, the protection of specific areas, the prohibition of aerial spraying as well as the implementation of the integrated management of harmful organisms, in accordance with the provisions of national and European normative acts.

We also specify that the Ministry of Agriculture and Rural Development has elaborated a normative act (Order no. 185/10.05.2023) regarding the approval of the Code of Conduct of the professional user of plant protection products and of the beekeeper, which specifies both the obligations of the professional users of plant protection products and local councils as well as beekeepers' obligations.

In conclusion, we mention the fact that all these advances were largely due to the permanent dialogue between Ministry of Agriculture and Rural Development and the representative associations in the beekeeping sector, including in the elaboration of positions at the European level.

Signed by

General Director

Elena TATOMIR

