



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B. Quality, Research & Innovation, Outreach  
The Director



I would like to thank you for your letter of 5 December 2020 and your email of 25 January 2021, in which you ask questions regarding treatments against *Varroa* with organic acids and products based on these acids in organic beekeeping. Please accept my apologies for the late reply.

Article 25 of Regulation (EC) No 889/2008<sup>1</sup> sets specific rules on disease prevention and veterinary treatment in beekeeping.

Regarding treatment against *Varroa*, the following paragraphs of Article 25 apply:

*“3. The practice of destroying the male brood is permitted only to isolate the infestation of *Varroa destructor*.*

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

*5. Veterinary medicinal products may be used in organic beekeeping in so far as the corresponding use is authorised in the Member State in accordance with the relevant Community provisions or national provisions in conformity with Community law.*

*6. Formic acid, lactic acid, acetic acid and oxalic acid as well as menthol, thymol, eucalyptol or camphor may be used in cases of infestation with *Varroa destructor*.*

*7. If a treatment is applied with chemically synthesised allopathic products, during such a period, the colonies treated shall be placed in isolation apiaries and all the wax shall be replaced with wax coming from organic beekeeping. Subsequently, the conversion period of one year laid down in Article 38(3) will apply to those colonies.*

*8. The requirements laid down in paragraph 7 shall not apply to products listed in paragraph 6.”*

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<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02008R0889-20200107&qid=1613495679264&from=EN>



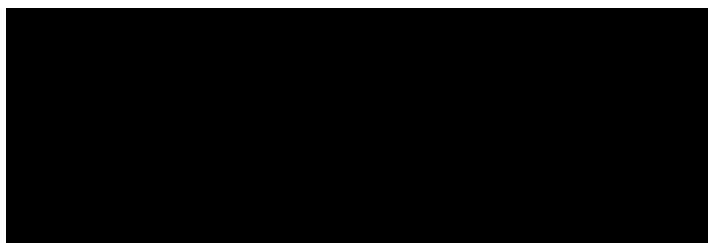
A product indicated to treat or prevent a disease like varroosis in animals, such as organic acids and products based on these acids, falls within the definition of a veterinary medicinal product according to Article 1 of Directive 2001/82/EC<sup>2</sup>. Please note that, from 28 January 2022, the new Veterinary Medicinal Product Regulation (EU) 2019/6<sup>3</sup> will replace the current Directive. As honeybees are considered a food-producing species, any pharmacologically active substance for use in bees to treat or prevent a disease should be authorised as a veterinary medicinal product. Authorised veterinary medicinal products need to have a defined withdrawal period set for food commodity 'honey' and have any necessary user warnings to protect treated bees, their owners and the future consumers of bee products.

Hence, formic acid, lactic acid, acetic acid and oxalic acid may be used as treatments against infestation by *Varroa* in organic beekeeping provided the use of these acids as veterinary medicinal products is authorised in a Member State in accordance with the relevant Union provisions or national provisions in conformity with EU law.

Please note that, from 1 January 2022, the new organic Regulation (EU) 2018/848<sup>4</sup> will apply. Regarding the treatment against *Varroa* in beekeeping, provisions are laid down in particular in point 1.9.6.3 (e) of part II of Annex II to Regulation (EU) 2018/848.

The present opinion is provided on the basis of the facts as set out in your letter of 5 December 2020 and your e-mail of 25 January 2021 and expresses the view of the Commission services and does not commit the European Commission. In the event of a dispute involving Union law it is, under the Treaty on the Functioning of the European Union, ultimately for the European Court of Justice to provide a definitive interpretation of the applicable Union law.

Yours sincerely,



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<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02008R0889-20200107&qid=1613495679264&from=EN>

<sup>3</sup> <https://eur-lex.europa.eu/eli/reg/2019/6/oj>

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02018R0848-20210101&qid=1613495738010&from=EN>