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**NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: AOB item for the meeting of the “Agriculture and Fisheries” Council on 18 November 2024  
Protective measures under Article 4(1) of Regulation (EU) 2024/1392 for imports of Ukrainian honey into Bulgaria and Romania  
*- Information from Bulgaria, supported by Romania*

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**Protective measures under Article 4(1) of Regulation (EU) 2024/1392 for imports of Ukrainian honey into Bulgaria and Romania**

*Information from Bulgaria, supported by Romania*

The beekeeping sector has significant economic, environmental and cultural importance for Bulgaria. The favourable climate and wide variety of plants create good conditions for its development. Honey production in the country has long history, traditions and it is deeply rooted in its culture. Bulgaria is among the leading producers of honey in Europe as the Bulgarian honey is characterized by high quality and rich taste, which makes it well received at the international markets. The beekeeping in our country provides important sources of income for many families and small businesses.

Besides the challenges, which the sector in Bulgaria faces in the last three years (*climate changes, urbanization and industrialization, problems with the use of pesticides in the agricultural production, vulnerability to diseases and parasites, etc*), there is also difficulties with the competition of imported honey from Ukraine in increased volumes at considerably lower prices. This in practice already has its negative impact and this year the producers have reported serious market disturbances.

Between 2014 and 2021 the import of honey from Ukraine in Bulgaria did not exceed the annual average quantity of around 490 tonnes. However, in the last three years since 2022 there is significant increase of the imported quantities, which is only intensifying after the introduction of temporary trade liberalization with Ukraine (since the beginning of June 2022).

In 2022 almost twice as much Ukrainian honey was imported in the country compared to the previous year (from 518 tonnes in 2021 to 973 tonnes in 2022).

For 2023 the situation is similar – the import from Ukraine continues to grow and reaches 1 060 tonnes, which already represents significant part of the production in the country of approximately 10%.

The official statistics data in the country for this year until August and the operational information provided by the National Customs Agency for September and October are even more worrying. The imports from Ukraine between January and October 2024 reach 1 136 tonnes – quantity that exceeds the import for the whole 2023 and is over 30% higher than the imported Ukrainian honey for the same period in the previous year (873 tonnes).

The significant quantities of Ukrainian honey entering our market at much lower prices puts the prices of Bulgarian honey under pressure. The average value declared of the import of Ukrainian honey in Bulgaria for the eight months of 2024 is 1 721 EUR/tonne (around 3 366 BGN/tonne), marking a 19.3% year-on-year decrease. In comparison, the average price of producer of honey in Bulgaria for 2023 is 7 188 BGN/tonne. For the first half of 2024 a gradual decrease of the producer price down to an average of 6 795 BGN/tonne for the second quarter, which is with 6.1% below the level of a year ago. The increased import of Ukrainian honey in EU in general has negative impact also on the marketing of honey produced in Bulgaria at traditional European markets. For the first seven months of 2024 total export of honey from Bulgaria was reduced by 6.7% compared to the same period in 2023 due to decrease of deliveries to the EU Member States (which usually form over 90% of the total export) with 7,9%.

The beekeeping sector in Romania faces similar challenges as Bulgaria. From the statistical data available at the Agriculture Ministry level, it follows that in the period January - August 2023 the import of honey from Ukraine was 1547.38 tons, and in the period January - August 2024 the import of honey from Ukraine was 2002.44 tons. Therefore, comparing the statistical data from the mentioned period, it appears that in 2024 the import of honey from Ukraine increased by 29% compared to 2023.

Regrettably the safeguard measures on the import of honey from Ukraine undertaken at EU level since 21 August 2024 have not achieved the expected deterrent effect. Due to the especially low prices of Ukrainian honey the standard duty for third countries of 17.3% applied currently is not enough to limit the imports from Ukraine.

The unprecedented high levels of imports from Ukraine place in difficult situation the producers of honey in Bulgaria and Romania. This creates conditions for decreased viability of farms in the sector, which plays important role in providing alternative employment for the population in least developed rural areas.

In light of the foregoing, in order to prevent more significant and long lasting economic distortions and to stabilize the market of honey we urge the Commission to take protective measures according to Art. 4, paragraph 1 of the Regulation (EU) 2024/1392 of the European Parliament and of the Council regarding the import of honey from Ukraine in Bulgaria.