



# Certified Naturally Grown Honey Bee Standards

Compiled By Matt Taylor

Certified Naturally Grown™ encourages and certifies Ecologically Sustainable agricultural practices free of conventional chemical pesticides, herbicides, fertilizers and Genetically Modified Organisms.

The practices listed below, while strict, are also simple and recognizable. They are what organic growers have been successfully practicing and preaching for decades now.

**Certified Naturally Grown™ is NOT in any way affiliated with or accredited by the USDA National Organic Program.** However, we have literally quoted from PARTS of the publicly available [USDA National Organic Program rules](#) and the [National Organic Standards Board Apicultural Task Force Draft](#) below for use as the standards for Certified Naturally Grown™ Beekeepers.

The USDA has still not (at the time of this writing) integrated the NOSB recommendations. Instead, the USDA NOP uses the livestock standard for beekeeping which does not address many specialized needs of apiculture or even more importantly, the local level beekeeper. The USDA maintains a list of allowable materials on their website which our beekeepers must also conform to.

This being said, sustainable agriculture doesn't start and stop with a commitment to allowable and non-allowable materials and practices. **Certified Naturally Grown™** farmers have all demonstrated and continue to demonstrate a true desire to work within the natural biological cycles that are necessary for a truly sustainable farming system - a system that works in harmony with micro-organisms, soil flora and fauna, plants and animals, to maintain and increase the long-term fertility of soils, leaving it not worn-out, but rather even more vibrant and alive for the next generation of farmers that must come.

A basic respect for natural ecological balances, a patience and willingness not to force either plants or animals to move outside their natural rhythms, and the interest to listen rather than demand of our farmland... these are the central themes that have led us, and now enable us to grow food without the addition of synthetic fertilizers, insecticides or genetically modified organisms. These are the core values that are demonstrated by farms **Certified Naturally Grown™**.

Most of the following is quoted from the current **USDA NOSB Apiculture Standards Draft**.

Certified Naturally Grown™ **is neither accredited by, nor affiliated in ANY WAY with the USDA or the National Organic Program.** We are an independent program that has simply adopted the parts of the publicly available standard and recommendation.

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**§ 205.240 Apiculture practice standard.**

(a) Products from an apiculture operation that are to be sold, labeled, or represented as organic must be from hives which have been under continuous organic management for no less than 270 days prior to the removal of the products from the hive. If a prohibited material has been used in or on the hive prior to the 270 day transition, the producer must replace the hive's foundation with foundation made from organic wax and remove those products to be sold as organic, prior to the start of the transition period.

(f) The producer of an organic apiculture operation may:

(1) Allow bees from their operation to forage on non-organically managed land when adequate forage from organically managed land and/or land that is managed in accordance with § 205.207, as defined by the operation's organic apiculture plan, has been provided; and

(2) Provide supplemental feed from organic honey, organic sugar syrup, and/or pollen substitutes and supplements that are allowed under 205.603, *Except*, That, the producer must not provide organic sugar syrup less than 30 days prior to the harvest of honey to be sold, labeled, or represented as organic.

(h) Approved hive construction materials.

(1) Hives must be made of natural materials, including wood and metal.

(2) Outside hive surfaces may be painted with non-lead based paints.

(3) Plastic foundation may be used if dipped in organic beeswax and mounted in a wooden frame.

**(4) Starter foundation from a non-organic source may be used in frames if no more than 1 inch per frame is used and that portion of the frame is not harvested for sale as certified products.**

(i) The producer must establish and maintain preventive health care practices, including:

(1) Selection of bee stocks, hive densities, and colony locations appropriate to site-specific conditions and resistant to prevalent diseases and pests;

(2) Introduction of replacement bees which are from organic sources or from non-organic sources, *Provided*, That the replacement bees are managed organically for at least 60 days prior to the removal of organic apiculture products from the hive;

(3) Maintenance of adequate supplies of honey and pollen in the hive, including leaving hives with reserves of honey and pollen sufficient for the colony to survive the dormancy period;

(4) Use of foundation wax not contaminated with diseases or pests;

(5) Destruction of equipment and bees contaminated with disease or pests;

- (6) Use of management methods or modified equipment to control pests and diseases;
  - (7) Use of therapeutic applications of non-synthetic materials to control pests, parasites, and diseases, *Provided*, That such materials are not prohibited under § 205.604; and
  - (8) Use of therapeutic applications of synthetic materials, *Provided*, That such materials are allowed under § 205.603.
- (j) The producer must not:
- (1) Accept the presence of pests, parasites, or disease without initiating efforts to restore the health of the colony;
  - (2) Use synthetic materials not listed as allowed under § 205.603;
  - (3) Use non-synthetic materials prohibited under § 205.604;
  - (4) Use lumber treated with synthetic materials not listed as allowed under § 205.603 or non-synthetic materials prohibited under § 205.604 for hive construction materials;
  - (5) Use synthetic materials or non-synthetic materials prohibited under § 205.604 in bee smokers;
  - (6) Annually destroy bee colonies following honey flows;
  - (7) Rotate hives between organic and non-organic management; or
  - (8) Sell apiculture products as organic if they contain a residue of a prohibited material greater than 5 percent of the Environmental Protection Agency's tolerance for the specific material, pursuant to § 205.671.

### **III. Amendments to the National List:**

The NOSB Apiculture Task Force gathered information on materials currently used by apiculture operations and materials currently allowed by certifying agents. The Task Force proposes that the following materials be reviewed for possible inclusion on the National List, § 205.603.

The Task Force is not endorsing any of the materials listed below, and is not recommending the approval of any particular material listed. We recommend that the materials listed be reviewed on a high priority basis, due to the fact that many of the materials are currently being used by organic apiculture operations. Without a clear list of allowed apiculture materials, it will be impossible for the apiculture standard to be implemented.

The Task Force recommends that new subsections be created in § 205.603 and § 205.604 to specifically list synthetic substances allowed for use by organic apiculture operations and non-synthetic substances prohibited for use.

The current materials review process requires that a petition be submitted for each material being requested for review. The Task Force recommends that the NOSB submit the materials listed below for review, and direct the NOP to prioritize their review. The Task Force points out that a similar "blanket" list process was used when crop and handling standards were first developed. The Task Force further points out that this situation will occur when standards are written for any new sector

of the organic industry. Procedures to address the review of materials for new sectors should be developed by the NOSB Materials Committee.

In the table below, the name of the material appears in the first column. The S/N code in the second column stands for synthetic/natural. The third column contains information and notes on how and why the material is used. The information in this column may be helpful to construct annotations on use of the material.

<b>Acetic acid</b>	S	For apicultural use to disinfect empty combs which have been exposed to European foulbrood, Nosema, or the protozoan-caused Amoeba Disease.
<b>Carbon dioxide</b>	S	For apicultural use to control wax moth.
<b>Essential oils</b>	N	For apicultural use to control tracheal mites including: menthol, cinnamon, eucalyptus, spearmint, wintergreen, thyme, and camphor. These materials may be used after the last honey harvest of the season and must be discontinued 30 days before the addition of honey supers.
<b>Folic acid</b>	S	For apicultural use to control Varroa mites. This material may be used after the last honey harvest of the season and must be discontinued 30 days before the addition of honey supers.
<b>Formic acid</b>	S	For apicultural use to control Varroa mites.
<b>Lactic acid</b>	N S	For apicultural use to control Varroa mites. This material may be used after the last honey harvest of the season and must be discontinued 30 days before the addition of honey supers.
<b>Oxytetracycline (Terramycin)</b>	S	For apicultural use. Only for treatment of American foulbrood (AFB) in apiaries in which the disease has been diagnosed; beekeepers may not make routine, prophylactic applications of oxytetracycline in apiaries in which there has been no confirmation of the presence of AFB.  <b>If application is deemed necessary, hive must be placed in transition period as described in 205.240a</b>
<b>Vegetable shortening</b>	N	For apicultural use to control tracheal mites. This material may be used after the last honey harvest of the season and must be discontinued 30 days before the addition of honey supers.  <i>(Note: Some certifiers have allowed vegetable shortening mixed with sugar to form a patty. It is included here for review, but may not need to appear on the list, since it is a natural material, and may be used by definition. Since it ends up being eaten by the bees, it is assumed that the shortening would have to be from organic sources. If the shortening is used as an excipient, the Task Force is unclear as to whether the shortening must be organic or if it must appear on the list.)</i>

#### **IV. Handling Standards for Organic Apiculture Products:**

The Task Force had extensive discussion on the topic of apiculture handling standards without reaching a resolution. Recognizing the complexity this topic, and our desire to move the standards forward, we recommend that, for the present time, the standards deal only with production of apiculture products.

The Task Force recommends that the NOSB Processing Committee address the issue of organic "raw" honey vs. organic processed honey as the Committee develops standards and/or criteria for allowed processing technologies.

Attached as Addendum I are "Definitions of Honey and Honey Products" approved by the National

Honey Board June 15, 1996. The Task Force refers the list of definitions to the Processing Committee.

The Task Force recommends that the draft language contained below be referred to the Processing Committee for further consideration. Most of the requirements below are already covered by the handling section of the rule, and were deemed by the Task Force to be redundant. The Task Force recommends that the Processing Committee use the language below to develop a recommendation for standards which are unique to the handling of organic apiculture products.

**§ 205.273 Handling organic apiculture products.**

(c) An operation which handles organic apiculture products must implement Good Manufacturing Practices and be in compliance with all handling requirements of § 205.270 through § 205.272.

(d) Primary handlers of organic apiculture products must not:

- (1) Add water to honey to decrease the honey's viscosity;
- (2) Use fine mesh filters or diatomaceous earth to separate seed crystals from honey;
- (3) Use high pressure honey filtration;
- (4) Heat or handle organic apiculture products using kerosene heaters or any heating system which introduces petroleum fumes into the room; or
- (5) Control stray bees or other insects using synthetic insecticides, repellants, or fumigants, unless such materials are allowed under § 205.605