



REPUBLIC OF  
SLOVENIA



HUMAN  
RIGHTS  
OMBUDSMAN

Human Rights Ombudsman  
Dunajska cesta 56  
1109 Ljubljana

**Ms Louise Holck**  
**Chair**  
**ENNHRI**

**Ms Debbie Kohner**  
**Secretary General**  
**ENNHRI**

**By Email: [debbie.kohner@ennhri.org](mailto:debbie.kohner@ennhri.org)**

Date: 16 December 2024

Dear Ms Holck, dear Ms Kohner, distinguished colleagues,

The Human Rights Ombudsman of the Republic of Slovenia attaches great importance to the fact that the right to health and a healthy environment are fundamental human rights that must be fully guaranteed to everyone. It is the responsibility of every state to take measures to protect the environment, which includes creating conditions for achieving the highest level of physical and mental health. In this context, it is important to emphasize that the international concept recognises the right to health as an essential element of social well-being, which goes beyond the mere absence of disease and also includes preventive action or measures to ensure the maximum benefit for each individual and for the community as a whole.

One of the key elements in ensuring these rights is access to quality food, which is increasingly under threat from a number of factors. This is exacerbated by the growing prevalence of counterfeit food, which has unfortunately become a more common choice due to its affordability, despite the fact that it directly undermines public health, challenges consumer rights, and jeopardises the integrity of our food chain, while at the same time destroying the environmental and agricultural foundations of sustainable development. When counterfeit food reaches our plates, consumers are often unaware that they are consuming products of dubious origin, which can be detrimental to their health. Not only does this pose a risk to the individual, but it also places an additional burden on the healthcare system, which has to deal with the consequences of long-term consumption of such foods. However, the problem of counterfeit food goes much further and affects our environment. One of the most obvious examples is the crisis in bee-keeping. Due to unfair competition from fake honey, bee-keeping is being abandoned around the world, leading to a decline in the number of bees. Without bees, one of nature's most important pollinators, agriculture suffers, affecting rural employment and income for many farmers, biodiversity, and our entire ecosystem. The consequences of

reducing the diversity and variety of our diet could soon be seen in human health and well-being. Bees also play an important role in mitigating climate change, the effects of which are becoming more severe every year. The Republic of Slovenia has been actively promoting the importance of bees for more than a decade and we proposed to the United Nations that 20 May be declared World Bee Day. The proposal was unanimously supported on 20 December 2017.

The right to health and a healthy environment is therefore inextricably linked to our ability to protect the food chain from counterfeiting. At the Human Rights Ombudsman of the Republic of Slovenia, we believe that, in addition to appropriate monitoring mechanisms, support for local farmers and beekeepers, as well as raising consumer awareness about the importance of choosing quality food, are essential. Only through joint efforts can we ensure that future generations will be able to enjoy these rights.

The Human Rights Ombudsman of the Republic of Slovenia supports the efforts of the Beekeepers' Association of Slovenia to protect agriculture and bee-keeping from unfair competition, without which it is impossible to maintain a healthy food chain. We are convinced that together, through cooperation and wider involvement of decision-makers and other stakeholders, as well as through an appropriate regulatory framework, we can ensure that only authentic, natural bee and other products will be available on the market, thus ensuring the continued healthy development for future generations.

For this reason, the Human Rights Ombudsman of the Republic of Slovenia has held meetings with the President of the Beekeepers' Association of Slovenia and the European Beekeeping Federation, Mr. Boštjan Noč. During these meetings, the Human Rights Ombudsman of the Republic of Slovenia expressed his support for the entire community. We believe that it is very important to raise awareness and take active measures at the international level regarding the role of bees, as well as the broader protection of health and a healthy environment, and to address the increasingly widespread problem of counterfeit food. Genuine bee products, for example, should remain an exceptional gift of nature, valued for their health benefits and long-standing role in traditional medicine. It is worrying that almost half of the honey on the market is of illicit origin, threatening both consumers and the survival of beekeepers across Europe. This situation is unsustainable, so it is commendable to highlight the issue and call for action.

As a result, the Human Rights Ombudsman of the Republic of Slovenia addresses a call to the European Network of National Human Rights Institutions (ENNHRI) and its members, stressing the need to establish a system of awareness and warning about the importance of all the above issues, in particular the protection of bees and the bee-keeping. If the bee-keeping continues to suffer from the influx of counterfeit products, as stated, the consequences for food production and the environment will be significant and harmful. It is therefore essential for that States take measures to prevent this from happening. For this reason, it would be necessary to address the problem by highlighting the need to create appropriate legal frameworks and promote the adoption of legislation with effective monitoring and sanctioning mechanisms to prevent the entry of illicit honey and other counterfeit food products into our daily lives. In addition to raising awareness of the public right to a healthy environment and health, ombuds and national human rights institutions could advocate for a more ambitious and effective targets in this regard. This is of paramount importance, not only for the protection of consumers, but also for the preservation of the integrity of the European food system and the invaluable services provided by bees.

In light of the above, we propose to inform the members of the European Network of National Human Rights Institutions (ENNHRI) of these urgent concerns. We propose to discuss this issue at one of our forthcoming ENNHRI meetings to explore together how our network can contribute to promoting and addressing this important issue. ENNHRI's broad reach and influence provides a unique platform to raise awareness, promote dialogue, and advocate for stronger policies and regulations to safeguard the right to health, a healthy environment, and the integrity of our food systems. By working together, we can amplify the call for action and ensure meaningful progress in protecting these fundamental human rights.

Thank you for your attention to this critical issue. We look forward to further cooperation and joint efforts to address these pressing challenges.

Yours sincerely,



Peter Svetina  
Human Rights Ombudsman of the Republic of Slovenia