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Implementation of EFSA Bee Guidance Document

Letter to Commissioner Andriukaitis

Mr Vytenis Andriukaitis
Commissioner for Health and Food safety
Rue de la Loi
1049 Brussels

Cc: President of the Commission Jean-Claude Juncker
Cc :Commissioner Karmenu Vella

February 25th 2019

Implementation of EFSA Bee Guidance Document

Dear Commissioner Andriukaitis,

In May 2018, the European Commission came to an exemplary decision: to ban the outdoor use of 3 neonicotinoids (imidacloprid, clothianidin and thiamethoxam). The Commission decision was based on an in-depth assessment of these pesticides' risks to bees carried out by the European Food Safety Authority (EFSA), following the methodology described in EFSA's 2013 Bee Guidance Document.

EFSA adopted this guidance in 2013 but, despite it being considered the most comprehensive scientific reference [1] to assess the impact of pesticides on pollinators, it has still not been formally adopted by Member State governments in the Standing Committee on Plants, Animals, Food and Feed (PAFF Committee). As a result, the guidance document is still not used consistently in the EU risk assessment of pesticides, including of other neonicotinoids[2].

However, the devastating impacts of neonicotinoids and other pesticides on pollinators and other insect species are widely documented[3],[4]. Recent reports have highlighted significant declines in biodiversity with regard to birds and insects, in particular bees and other pollinators. To give an example, in the last 27

years, a decline of over 75 % in total flying insect biomass in protected areas has been observed[5].

Pollinating insects are particularly in danger, as stated in the EU Pollinators Initiative: '*the dramatic decline in the occurrence and diversity of all kinds of European wild insect pollinators, including wild bees, hoverflies, butterflies and moths. Numerous pollinator species are extinct or threatened with extinction*'. This situation poses serious concerns on food security. In the EU, around 84 % of crop species and 78 % of wild flower species depend, at least in part, on animal pollination; up to almost 15 billion euros of the EU's annual agricultural output is directly attributed to pollinators[6]. Biodiversity and robust ecosystems are of fundamental importance, particularly bees and other pollinating insects, to ensure a healthy and sustainable agricultural sector.

That is why the Parliament, on January 16th , with a majority of 78%, voted in favour of the Report on the Union's Pesticide authorisation procedure (the PEST report). The report reflects, inter alia, our growing concern around the issue of pesticide use and its impacts on bees and, more widely, biodiversity and the environment. In particular, the European Parliament welcomed the ban on all outdoor uses of the three neonicotinoids. Crucially it also called on the Commission and the Member States in the PAFF Committee to adopt, without delay, the updated 2013 bee guidance used by EFSA in its recent review of these three neonicotinoids.

Last year, on the 1st of March 2018, the European Parliament voted almost unanimously to support the Erdõs report on beekeeping, that called *"on the Commission and the Member States to act on the established scientific consensus and ban those pesticide active substances, including those neonicotinoids and those systemic insecticides which are scientifically proven (...) to be dangerous to bee health".*

Given the Parliament's position, we were shocked to hear that at the latest PAFF Committee meeting of 24th and 25th January 2019, the Commission proposed to EU governments to implement only a very small part of the 2013 EFSA guidance across all EU pesticide risk assessments, and to mandate EFSA to review the bulk of it. Key aspects such as chronic toxicity and risks to wild bees would be ignored until a revised guidance document is available. The apparent reason is that some governments who publicly supported the recent ban on the three neonicotinoids refuse to apply the same testing standards to other pesticides. As a result, the Commission's latest proposal eliminates requirements for the assessment of chronic toxicity and toxicity to bee larvae. It also removes deadlines for when the EU would have to assess all pesticides for potential risks to wild bees (the deadline of June 30, 2021 has been deleted for the assessment of both short- and long-term tests on honeybees, bumblebees and wild bees). Should this proposal pass, the EU would hinder rather than advance the application of EFSA's comprehensive Bee Guidance Document. It would block the application of state-of-the art bee safety standards for pesticides for years to come.

We thus urge you, both Commissioners and President of the European Commission, to do your utmost to ensure that the EFSA bee guidance is adopted in its entirety and is not weakened in any way.

Any weakening of the text will maintain existing shortcomings in the implementation of the provisions of of the EU authorisation procedure on pesticides, and thus fail to properly address the plight of Europe's bees, which are however key to the future of our biodiversity, agriculture and food security.

Given the scientific consensus on the alarming state of pollinators' health we also call you on to ensure that all pesticides, and in particular the remaining neonicotinoids, are assessed according to the same high standards as the three neonicotinoids. Other systemic plant protection products should be restricted as much as possible, including for seed treatment, if they pose a danger to human health and the environment.

We look forward to your response on this urgent matter

Yours sincerely,

Bart STAES MEP, Co-rapporteur PEST committee

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[1]According to the Bee Guidance Document (BGD), new patterns of exposure (at low doses but prolonged in time) constitute an essential aspect for the evaluation of systemic pesticides. This is why the EFSA BGD considers not only a pesticide's acute toxicity to bees but introduces other important parameters to properly evaluate the risk of systemic pesticides for bees:

1. chronic toxicity arising from longer exposure in time and accumulation effects;

2. multiple exposure routes in food (pollen, nectar, honeydew), water (guttation water, surface

water) and habitat (soil, dust, etc.);

3. effects on different life stages of bees and effects likely to affect the whole colony (for honey

bees).

These parameters, including the evaluation on chronic toxicity, are of paramount importance:

without these parameters in mind, the toxicity for pollinators of the three neonicotinoid recently banned (thiametoxam,clothianidine, imidacloprid) could not have been properly assessed. They need to be considered in each pesticide risk assessment in order to protect our pollinators.

[2]The assessments of the three neonicotinoids covered risks to honeybees and wild bees (bumblebees and solitary bees), including impacts from long-term exposure. EU assessments of other insecticides were either based on less stringent criteria, or only covered risks to honeybees: http://www.greenpeace.to/greenpeace/wp-content/uploads/2019/01/pesticides_beehealth.pdf

[3] http://www.eea.europa.eu/publications/late-lessons-2, see part B Section 16

[4] https://link.springer.com/article/10.1007/s11356-017-0341-3

[5] Hallmann, C.A., Sorg, M., Jongejans, E., Siepel, H., Hofland, N., Schwan, H., et al. (2017) 'More than 75 percent decline over 27 years in total flying insect biomass in protected areas'. PLoS ONE 12(10): e0185809. https://doi.org/10.1371/journal.pone.0185809

[6] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Pollinators Initiative. {SWD(2018) 302 final} - {SWD(2018) 303 final}. Brussels, European Commission.

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