

Portuguese Presidency of the Council of the EU
Rue de la Loi 175
B-1048 Bruxelles
Belgique
Cc President of the European Commission Ursula von der Leyen

June 21, 2021

Subject: Beekeeping organisations and civil society concerns on pesticide risk assessment methodology and bees' protection from pesticides

Dear Prime Minister Costa, Dear Commission President,

On behalf of beekeeping organisations and civil society organisations from different EU countries, we are writing to ask you to ensure that the largest possible protection for bees and pollinators from pesticides is reached in the vote of the AGRIFISH Council meeting of 28-29 June. It is the only way to preserve the European farming and beekeeping sectors, the millions of jobs they sustain, and the environment and society at large from the exposure and negative impact of these products, and to allow bees as well as many other insects to render farmers and citizens their services.

It is hardly necessary to remind you of the importance that bees and other pollinators have in ensuring our food security and healthy, functioning ecosystems. They are usually forgotten as a production factor, however, they contribute as far as 75% of agricultural production for yield and/or quality, when 35% of global crop production volume is due entirely to their pollination service¹. Millions of professional activities depend on bees, be they wild or managed: not only beekeepers, but also wild pollinators' breeders, fruit growers, seed producers, perfume manufacturers, and many other agricultural activities depending closely on pollination. The service they provide has been valued at 153 billion EUR per year globally², while in the EU it is estimated that 15 billion EUR of the EU's annual agricultural output can directly be attributed to insect pollinators³, the equivalent of 1.5 times the annual CAP payment of France, the largest beneficiary of these EU subsidies.

For beekeepers, bees are the basis of our economic sustain and our cultural heritage. We experience fluctuating average winter losses between 10 and 20% in Europe,

¹ IPBES. Potts, S., Imperatriz-Fonseca, V. L., Ngo H. T., (eds). 2016. *Assessment report on pollinators, pollination and food production*. Secretariat of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, Bonn, Germany. 552 p.

² Gallai, N., Salles, J-M., Settele, J., Vaissière, B., 2009. "Economic valuation of the vulnerability of world agriculture confronted with pollinator decline". *Ecological Economics*. 68(3): 810-821.

³ https://ec.europa.eu/commission/presscorner/detail/en/IP_18_3989

reaching up to 44,5% in Germany in the last years (winter 2015/2016)⁴. This is already putting a burden on beekeeping as a sector and on the pollination potential of insects. Please consider that if managed bees experience troubles, other wild bees or insects suffer as well – indeed, nearly 80% of total insect biomass have disappeared in almost 30 years in Europe⁵.

Many factors threaten bees and other insect pollinators’ survival, and with them, global pollination ecosystem services, as well as beekeeping and (many) farming economic activities. Indeed, not only pesticides affect them, but also climate change, unsustainable agricultural practices, pests and diseases, invasive species or land-use change⁶, and **that is why pesticides should have the most limited impact, ideally no impact at all, on bees and other pollinators.**

The importance of pollinators is well-known and recognised by EU institutions. The Council of Ministers concluded that it “ENDORSES the goal of developing a European sustainable food system, from production to consumption” and “EMPHASISES the vital role of pollinators for healthy ecosystems and food security”⁷. We request you to be coherent with these conclusions and ensure the greatest possible protection of pollinators in the framework of the authorisation of plant protection products.

You have the opportunity to resolve a part of this dramatic situation. The establishment of a new pesticide risk assessment methodology is in the process of being defined and in particular the trigger setting the point where higher tests are needed to assess the toxicity of a product. EFSA proposed, and risk managers from the EU Member States ratified, the threshold of 7% impact on colony strength as an acceptable effect in the risk assessment of pesticides on bees in 2013⁸. The threshold of 7% is based on the most updated science and is already implemented in practice, as stressed by some of the latest Draft Assessment Reports⁹ agreed by the Commission and Member States¹⁰. Field trials performed by scientists proved the feasibility of detecting up to 5% in colony strength¹¹. Furthermore, the recent ruling of the European Court of Justice clearly states the need to base decision-making on the most up-to-date science¹².

It came to our knowledge that while some countries are proposing to set this “status quo” threshold, keeping the level of protection for bees currently applied in risk assessment, some others are proposing to set a higher threshold of up to 25% acceptable

⁴ Brodschneider, et al. 2016. “Preliminary analysis of loss rates of honey bee colonies during winter 2015/16 from the COLOSS survey”. *Journal of Apicultural Research*, 55(5): 375-378.

⁵ Hallmann, Caspar A., et al. 2017. “More than 75 percent decline over 27 years in total flying insect biomass in protected areas”. *PloS one*, 12(10): e0185809.

⁶ IPBES. Potts, S., Imperatriz-Fonseca, V. L., Ngo H. T., (eds). 2016. *Assessment report on pollinators, pollination and food production*. Secretariat of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, Bonn, Germany. 552 p.

⁷ Council of the European Union, Council Conclusions on the Farm to Fork Strategy, 19 October 2020, accessible at : <https://data.consilium.europa.eu/doc/document/ST-12099-2020-INIT/en/pdf>

⁸ EFSA. 2013. “Guidance on the Risk Assessment of Plant Protection Products on Bees (*Apis Mellifera*, *Bombus* Spp. and Solitary Bees)”. *EFSA Journal*, 11(7): 3295. 266 p.

⁹ See Draft Assessment Reports of fenamidone, <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2016.4406>, dimethoate, <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2018.5454> and alpha-cypermethrin, <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2018.5403>.

¹⁰ <https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/sp.efsa.2015.EN-924> (section 4 and post meeting note at page 25/26).

¹¹ Osterman J et al. 2019. “Clothianidin seed-treatment has no detectable negative impact on honeybee colonies and their pathogens”. *Nature Communications*, 10(1): 692.

¹² CJEU, Judgment of the court, 6 May 2021, C-499/18, *Bayer CropScience AG and Bayer AG v. European Commission*, <https://curia.europa.eu/juris/document/document.jsf?text=&docid=240844>

impact on colony strength, meaning having an even lower level of protection than what is already applied today! If this threshold were chosen, it would mean that a 25% reduction in bee colony strength would be considered as acceptable as a result of pesticides impact (not considering all other threats on bees), which is considered by EFSA as a threshold that puts the survival of bee colonies to extreme risk!

In our views, it is unacceptable to establish a framework which would give priority to the right to market and use pesticides over the regulators' duty to protect biodiversity, food security and environmental health.

Furthermore, by weakening the threshold for acceptable levels of impact on bee colonies, such framework would run against the requirements of Article 4 and Point 3.8.3 in Annex II of Regulation (EU) 1107/2009 (the Plant Protection Product Regulation), which expressly set out the protection goals for honeybees and colonies, and would breach the precautionary principle, on which such provisions are based.

As civil society and beekeepers' representatives, we urge you to ensure the highest level of protection for bees and to consequently adopt a **0% threshold of impact in colony strength coming from the exposure to pesticides. In no case, however, Member States should depart from scientific evidence and exceed the 7% threshold which is already recognised by European scientific bodies as the minimum acceptable standard.**

As EU leaders, you have a duty to preserve biodiversity, food security and the beekeeping sector in the EU from unacceptable impacts from pesticides. Ensuring the lowest threshold is chosen as part of specific protection goals in the risk assessment of pesticides on bees is the sole course of action coherent with such duty.

Best regards,

Francesco Panella, President - **BeeLife European Beekeeping Coordination**

François Veillerette, President - **Pesticide Action Network Europe**

Matt Shardlow, Chief Executive - **Buglife**

Pedro Pozas Terrados, Executive Director - **Proyecto Gran Simio**

Gilles Ratia - **Apiservices**

Jeff Pettis, President - **Apimondia**

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Mattia Cappello - **APINCITTA' ASSOCIAZIONE AMBIENTALISTA**

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Saskia Richartz, Campaign leader - **Wir haben es satt!**

Magda Stoczkiwicz, Deputy Director - **Greenpeace**

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