



22 October 2019

**Re. Bees unprotected - please support the objection to the draft Commission Regulation on the assessment of pesticides' impact on bees - Vote in PLENARY on Wednesday, 23 October**

Dear Member of the European Parliament,

With this letter, BeeLife, BugLife, Greenpeace, Pollinis, SumOfUs and Pesticide Action Network (PAN) Europe ask you to support the proposed objection against the draft Commission Regulation (EU) amending Regulation (EU) No 546/2011 as regards the assessment of the impact of plant protection products on honeybees.

The draft resolution will be put to vote in the Parliament's plenary session on 23 October.

If the Parliament's plenary adopts this resolution, it will effectively stop the **Commission's plans to maintain scandalously weak levels of protection for bees against harmful pesticides, which are based on outdated science.** We urge you, on behalf of our memberships of hundreds of thousands of citizens across Europe<sup>1</sup>, to demand the implementation of the highest standards available to protect bees from pesticides, as requested by the pesticide regulation 1107/2009/EC and as set out in EFSA's 2013 Bee Guidance document.<sup>2</sup>

Europe's bees and other insects are under threat. In Germany, scientists have recorded losses of more than 75 percent of the total mass of insects in protected areas over 27 years.<sup>3</sup> In the Netherlands, detailed data shows that more than 50 percent of wild bee species are threatened

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<sup>1</sup> 238,000 people have signed the SumOfUs petition for full implementation of the Bee Guidance document <http://sumofus.org/bee-guidance>

<sup>2</sup> EFSA (2013). EFSA Guidance Document on the risk assessment of plant protection products on bees (*Apis mellifera*, *Bombus* spp. and solitary bees). EFSA Journal 2013; 11(7):3295

<sup>3</sup> Hallmann CA et al. (2017). More than 75 percent decline over 27 years in total flying insect biomass in protected areas. PLoS ONE 12(10)

with extinction.<sup>4</sup> One of the major causes for these developments is industrial farming exposing bees to harmful pesticides.<sup>5</sup>

The 2013 Bee Guidance document is the most up-to-date scientific standard for pesticide risk assessment for bees. It includes an assessment of acute and chronic effects of pesticides on both honeybees and wild bees. This guidance enabled EFSA to provide a full evaluation of risk arising from the use of three neonicotinoid pesticides, which in turn allowed the EU to impose its much-celebrated 2018 ban on all outdoor uses of these pesticides.

Both the Commission and EFSA have repeatedly stated that they support the 2013 Bee Guidance document. But Member States have blocked its application in the Standing Committee on Plant, Animal, Food and Feed. In the meantime old guidance from 2002 remains in place which was co-written by the pesticide industry<sup>6</sup> and which is based on “outdated” science, according to the Commission<sup>7</sup> and EFSA<sup>8</sup>.

European citizens are aware of how important the application of robust pre-approval tests of pesticides are to reversing pollinator declines and demand the immediate and integral adoption of the 2013 EFSA guidance.<sup>1</sup>

The EU must protect Europe’s bees and the environment from dangerous pesticides on the basis of “current scientific and technical knowledge”<sup>9</sup>, according to the EU’s pesticide regulation (Regulation (EC) No 1107/2009). The failure of the Member States and the European Commission to apply the regulations means **it is now down to MEPs to veto their unacceptable plans and get the tasks of respecting EU law and protecting Europe’s bees back on track.**

Sincerely,

Rebecca Falcon, SumOfUs  
Franziska Achterberg, Greenpeace Europe  
Barbara Berardi, Pollinis  
Noa Simon Delso, Bee Life  
Matt Shardlow, BugLife  
Martin Dermine, Pesticide Action Network Europe

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<sup>4</sup> Reemer, M. (2018). Basisrapport voor de Rode Lijst Bijen, EIS Kenniscentrum Insecten Leiden.

<sup>5</sup> Sánchez-Bayo, F., & Wyckhuys, K. A. (2019). Worldwide decline of the entomofauna: A review of its drivers. *Biological Conservation*, 232, 8-27.

<sup>6</sup> Pesticide Action Network (2018). Industry writing its own rules and CEO and BeeLife European Beekeeping Coordination (2010): Is the future of bees in the hand of pesticide lobby?

<sup>7</sup> Response to Greenpeace and others from Commissioner Vytenis Andriukaitis, 31/01/2017

<sup>8</sup> EFSA (2012). Scientific Opinion on the science behind the development of a risk assessment of Plant Protection Products on bees (*Apis mellifera*, *Bombus* spp. and solitary bees). *EFSA Journal* **10 (5)**, 1–275 (2012).

<sup>9</sup> Regulation (EC) No 1107/2009, Article 4; ANNEX II, Point 3.8.3; Articles 11 and 36