



Bees unprotected

How the EU is failing to shield bees from dangerous pesticides

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.¹ In the Netherlands, detailed data shows that more than 50 percent of wild bee species are threatened with extinction.² The seasonal loss of honey bee colonies is also increasing in some European countries.³ One of the major causes for these developments is industrial farming, which brings about “emptied” landscapes providing bees with insufficient food sources, exposing them to pesticides and increasing their susceptibility to disease.⁴

EU pesticide regulations rule out harm to bees, in principle.

According to EU regulations, agrichemicals can only be approved in the EU if their use has “no unacceptable effects on the environment”, including potential effects on “non-target species” like bees as well as “biodiversity and the ecosystem”. With regards to honey bees, EU-approved pesticides must have “no unacceptable acute or chronic effects on colony survival and development, taking into account effects on honeybee larvae or honeybee behaviour”. The risk assessment, which forms the basis for regulatory decisions, must be “independent, objective and transparent” and carried out “in the light of current scientific and technical knowledge”.⁵

Politics and the pesticide lobby are interfering with the application of the most up-to-date scientific and technical knowledge to protect bees from dangerous pesticides.

Despite the regulations, the EU cannot currently rule out high risks to bees and other pollinators arising from EU-approved chemicals. This is because the current risk assessment methodology does not capture all the different ways in which pesticides can harm bees. Whilst a comprehensive EFSA Guidance Document⁶ is available, the Commission says it “cannot rely on this guidance for decisions on applications for renewal of approval, if it is not endorsed by Member States.”⁷

The European Food Safety Authority (EFSA) proposed this robust risk assessment scheme as early as 2013. It applied this scheme in the assessment of three pesticides of the neonicotinoid family⁸ that the EU subsequently banned for all outdoor uses.⁹ However, the pesticide industry has vigorously opposed the application of the scheme,¹⁰ and managed to turn a number of EU governments against it too. According to the Commission, in October 2018, 16 EU Member States “indicated the need to revise the Bee Guidance Document first before it being implemented”.¹¹

¹ 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)

² Reemer, M. (2018) [Basisrapport voor de Rode Lijst Bijen](#), EIS Kenniscentrum Insecten Leiden.

³ Potts S.G., Ngo H.T. et al. (2016): [The assessment report of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services on pollinators, pollination and food production](#).

⁴ Sánchez-Bayo, F., & Wyckhuys, K. A. (2019). [Worldwide decline of the entomofauna: A review of its drivers](#). Biological Conservation, 232, 8-27.

⁵ Regulation (EC) No 1107/2009, Article 4; ANNEX II, Point 3.8.3; Articles 11 and 36

⁶ 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

⁷ [Response to Greenpeace and others](#) from Commissioner Vytenis Andriukaitis, 19/02/2019

⁸ EFSA (2016): Peer review of the pesticide risk assessment for the active substances clothianidin and imidacloprid in light of confirmatory data submitted; Outcome of the consultation with Member States, the applicant and EFSA on the pesticide risk assessment for thiamethoxam in light of confirmatory data.

⁹ Commission Implementing Regulations (EU) 2018/783, 784 and 785 of 29 May 2018

¹⁰ For example, ECPA input for July SCoPAFF meeting, 10 July 2019

¹¹ European Commission, Summary Report of the PAFF Committee meeting 23-24 October 2018

EFSA's 2013 Bee Guidance Document – the most appropriate methodology so far

Contrary to the current guidance document, which dates back to 2002,¹² the 2013 guidance contains a risk assessment scheme for the chronic risk to adult honey bees and honey bee larvae as well as for the risk to bumble bees and solitary bees. It also considers all common routes of exposure. Despite some weaknesses, the Bee Guidance document represents the most comprehensive methodology for assessing the risks posed by pesticides to bees.¹³

Worryingly, ongoing policy developments could mean that the EU will not regulate pesticides on the basis of “current scientific and technical knowledge” for at least another two years. In the meantime, old guidance from 2002 remains in place, which was co-written by the pesticide industry,¹⁴ and which is based on “outdated” science, according to the Commission.¹⁵

- **EFSA guidance to be revised.** On 11 March, the European Commission asked EFSA to revise its 2013 Guidance Document. Based on the mandate, EFSA will review all elements of it, including the level of protection (i.e. what effects are considered “unacceptable”). The deadline is March 2021.
- **Bee safety screening to ignore a wide range of potential risks.** On 17 July, the Commission asked EU Member States to endorse a change in the EU’s so-called “uniform principles” regulation, which informs the first screening of pesticides’ risks to bees.¹⁶ The amended criteria encompass only acute risks (i.e. effects resulting from a single contact with a chemical) to honeybees. Important criteria for chronic risks and risks to larvae and wild bees, which were included in earlier drafts, were scrapped before the vote. A majority of EU governments voted in favour of this disappointing amendment, only France voted against. The UK and Greece abstained.
- **Non-implementation of EFSA guidance to be made official.** Later in the year, the Commission plans to publish a so-called Commission Notice that sets out the next steps. According to a draft released by the Dutch agriculture minister, few parts of EFSA’s 2013 guidance will be used until EFSA has completed its lengthy review, leaving bees exposed to harmful pesticides.

As things stand, the EU’s legal criteria for the protection of bees from pesticides are effectively being suspended, paving the way for chemical companies to sell **products that are as dangerous to bees as the banned neonicotinoids**. According to the Commission, the EU can only restrict or ban such pesticides based on an exceptional procedure¹⁷ that allows it to review existing approvals when new scientific studies points to potential harm. (This is what happened with the three neonicotinoids.) This is despite the fact that pesticide manufacturers are already obliged to supply studies needed for a more comprehensive assessment (e.g. on chronic toxicity to honey bees) as part of their application dossiers.¹⁸

The EU must step up its game to protect bees from dangerous pesticides. It has to ban all pesticides for which a high risk to bees cannot be excluded, just as it did with the three neonicotinoids.

Contact: Franziska Achterberg, EU Food Policy Director, Greenpeace European Unit,
franziska.achterberg@greenpeace.org, +32 2 274 19 18

Martin Dermine, Health and Environment Policy Officer, Pesticide Action Network (PAN) Europe,
martin@pan-europe.info, +32 2 318 62 55

¹² Guidance Document on Terrestrial Ecotoxicology Under Council Directive 91/414/EEC, SANCO/10329/2002 rev 2

¹³ POLLINIS (2019): [Risk assessment of pesticides on pollinators in Europe: obsolete procedures and conflicts of interest](#).

¹⁴ Pesticide Action Network (2018): [Industry writing its own rules](#)

¹⁵ [Response to Greenpeace and others](#) from Commissioner Vytenis Andriukaitis, 31/01/2017

¹⁶ Commission Regulation (EU) .../... of XXX amending Regulation (EU) No 546/2011 as regards the assessment of the impact of plant protection products on honeybees

¹⁷ Regulation (EC) No 1107/2009, Article 21

¹⁸ Regulations (EC) 283/2013 and 284/2013