



Grez-Doiceau, 10/03/2015

To : Mr René Collin, Minister of Agriculture
rene.collin@gov.wallonie.be

Object: National support for the EFSA Guidance on the risk assessment of pesticides on bees

Dear Mr. Collin,

On the 20th of March 2015, Belgian delegates are going to participate to a SCOFCAH meeting at EU level deciding on the implementation or not of the EFSA Guidance on the risk assessment of pesticides on bees¹. Several member states are reluctant to the implementation of the Guidance, delaying its enforcement at EU level.

As a local association of beekeepers, particularly sensible to the severe problems that the honey bees and other pollen-gathering insects are currently facing, we would like to take this decisive opportunity to explain why Belgium must defend politically and scientifically the EFSA Guidance and strongly impede the watering-down of its implementation.

We would like also being kept informed of the position of your ministry in this file.

(1) The EFSA Guidance on bees is currently the unique scientific-based tool adapted to properly enforce the EU legal framework in place.

The EFSA Guidance is the result of a thorough and independent scientific process developed since 2011. Furthermore, various public consultations have been organized to enrich the document, making the process not only scientific, but also transparent and democratic. The protocol proposed is currently the unique available methodology for risk assessment adapted to comply with the current legal framework.

¹ www.efsa.europa.eu/en/efsajournal/doc/3295.pdf

Indeed, Regulation (EC) No 1107/2009² (Annex II, 3.8.3) determines as approval criteria the following:

« An active substance, safener or synergist shall be approved only if it is established following an appropriate risk assessment on the basis of Community or internationally agreed test guidelines, that the use under the proposed conditions of use of plant protection products containing this active substance, safener or synergist:

- will result in a negligible exposure of honeybees, or*
- has no unacceptable acute or chronic effects on colony survival and development, taking into account effects on honeybee larvae and honeybee behaviour. »*

In addition, the data requirements for the authorization of active substances and plant protection products are also legally defined by Commission Regulation (EU) No 283/2013³ and No 284/2013⁴, respectively. These data requirements include: acute toxicity (oral and contact), chronic toxicity, effects on honeybee development and other honeybee life stages, sub-lethal effects (such as behavioural and reproductive effects) on bees and on colonies. The annexes of both regulations (paragraph 8.3.1 of Regulation (EU) 283/2013 and paragraph 10.3 of Regulation (EU) 284/2013) specify the needs to assess the risk of pesticides and their metabolites in nectar, pollen and water, including guttation, of dust and drift in the case of seed treatment, etc.

To date no other Guidance for pesticide risk assessment on bees exists apart from the one proposed by EFSA including all these exposure routes and toxicological endpoints. Furthermore, the EFSA Guidance is the only methodology able to properly evaluate the risks posed by pesticides with systemic properties. It takes into account the most important parameters when dealing with systemic pesticides and bees:

- Multiplication of the exposure sources: pollinators are exposed to systemic pesticides and their metabolites through their feed (pollen, nectar, honeydew) the water they drink (guttation water, surface water...) and their habitat (the soil where they live, the air that they breath, etc.)
- Longer exposure in time, increasing the chronic exposure of pollinators and other living organisms⁵
- Effects on different life stages depending on their biology and nutrition as well as other traits that may affect the survival and the development of the colony.

(2) Enabling tools are available to ease the EFSA Guidance implementation

Risk assessment of pesticides on bees requires a minimum of knowledge about bee biology and pesticide environmental fate. It is true that the EFSA Guidance shows a more complete toxicological

2 <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32009R1107>

3 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:093:0001:0084:EN:PDF>

4 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:093:0085:0152:EN:PDF>

5 As an example, the half-life of clothianidin in soil has been measured at 148 to 6900 days (sandy-loam and clay soils). Imidacloprid can be absorbed into untreated follow-on crops, up to two years after first use, and can then emerge in pollen and nectar of untreated flowers at levels toxic for bees. In 2002 and 2003, 69.1% of pollen collected by bees at 25 apiaries in five French departments, from treated and untreated plants was found contaminated with imidacloprid, even though this neurotoxin was ban from use on sunflowers in January 1999. Source: <http://bee-life.eu/en/article/34/>

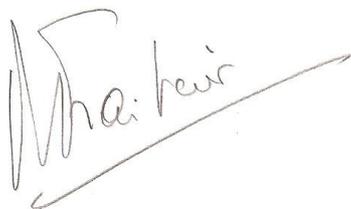
picture of the potential impact of pesticides on bees. However, as previously mentioned, the additional information included is not an EFSA initiative, but is imposed by the legal framework.

Moreover, risk assessment approach and principles remain the same as in the past. And for the first time, the EFSA has made available tools for risk assessment of pesticides on bees in order to simplify the Guidance implementation. Besides, trainings to risk assessors and managers have already been organized and could continue being organized in the future.

In conclusion, there is no doubt about the fact that the EFSA has proposed a science-based applicable methodology for risk assessment of pesticides on bees. The proposed Guidance integrates the approval criteria and the data requirements established by the EU law. In order to ensure the safety of bees, pollinators and of us all, we urge you, Mr. Collin, to support the EFSA Guidance on bees.

We remain at your disposal for any further information. We look forward to seeing your positive support to the European Commission on this specific issue.

Best regards,

A handwritten signature in black ink, appearing to read 'Michel Fraiteur', with a long horizontal line extending from the end of the signature.

Michel Fraiteur
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