A NOT-FOR-PROFIT NGO REGISTERED UNDER FRENCH LAW, POLLINIS IS FUNDED EXCLUSIVELY BY DONATIONS FROM INDIVIDUALS TO PROTECT WILD AND HONEY BEES, AND TO PROMOTE SUSTAINABLE AGRICULTURE IN ORDER TO HELP PRESERVE POLLINATORS.

PRESS RELEASE

BEE GUIDANCE DOCUMENT: NEW PESTICIDE RISK ASSESSMENT PROTOCOLS PROPOSED BY EFSA WILL NOT SAVE POLLINATORS FROM EXTINCTION

On Thursday 11 May, the European Food Safety Authority (EFSA) unveiled its new proposal for a guidance document to define European protocols for the risk assessment of pesticides on bees. This new "Bee Guidance Document" is not up to the challenge of addressing the ongoing collapse of bees and wild pollinators.

Since 2019, the European Food Safety Authority (EFSA) has been working on its revision of the Bee Guidance Document, which describes the risk assessment protocols of pesticides on bees (honeybees, bumblebees and solitary bees). Unveiled to the press on 11 May, this new version is a missed opportunity to implement real protection for pollinators against the risks of chemical pesticides, and marks a step backwards from the initial ambitions of this project compared to EFSA's previous proposal.

Submitted in 2013, the first draft of the Bee Guidance Document was never adopted due to a lack of political consensus within the SCoPAFF, the Standing Committee on Plants, Animals, Food and Feed. The Document was presented about 30 times to SCoPAFF's agenda before the Committee asked EFSA to submit a new proposal. In the many interim years, the completely obsolete protocols established in 2002 have continued to be applied.

While the new proposed Bee Guidance Document, *Revised guidance on the risk assessment of plant protection products on bees*, is a clear step forward from the 2002 protocols, it unfortunately lacks the ambition necessary to protect bees and remains less ambitious than its previous 2013 version. **Among the problematic shortcomings and revisions within this document, POLLINIS denounces the following points:**

- The acceptable mortality rate (reduction in the number of individuals in a colony) for honeybees has been increased to 10% for each use of a pesticide, whereas the 2013 Bee Guidance Document set this threshold at 7%.
- Combined effects, or 'cocktail effects', are not measured. While there are
 technical difficulties in measuring the full range of mixture effects, it would
 have been significant to include an assessment of at least the most common
 binary combinations and intentional mixtures (such as tank-mixes), with
 particular attention to synergistic effects between some classes of fungicides
 and insecticides.

- The new guidance document does not set a mortality threshold for wild bees, such as bumblebees or solitary bees. The risk assessment for these species has been weakened compared to the last version; in particular, the first tier (laboratory tests) is not mandatory for wild bees.
- The majority of sublethal and indirect effects are ignored. For example, the effects of pesticides on the reproductive and immune systems of honeybees are not taken into account
- The assessment of sources of bee exposure to pesticides is incomplete. While some exposure pathways have been added as compared to the 2002 protocols used today, others that are crucial for solitary bees are sorely lacking (soil contamination, nesting materials, etc.). Furthermore, some exposure pathways included in the 2013 version, such as water contamination, have been removed.

Whereas the EFSA Bee Guidance 2013 focused on pursuing a broad protection objective by including as many potential risks as possible, the 2023 version ignores certain effects, even where draft guidelines (OECD) or robust studies and trials exist.

"While this new guidance document represents a clear improvement on the current assessment scheme, it is still insufficient to ensure the true protection of bees and pollinators from the risks of pesticides. There is an urgent need to adopt an approach that actually takes the current scientific knowledge into account, without limiting testing to OECD-validated protocols. Unfortunately, the extinction underway is outpacing the validation of protocols," explains Barbara Berardi, Director of Research and Advocacy at POLLINIS.

The process initiated by EFSA in 2019 was intended to be collaborative. A version of the document was published and opened for civil society feedback in 2022. POLLINIS contributed to this feedback by making several concrete proposals that would have allowed a risk assessment that was truly protective of pollinators, in particular solitary bees and bumblebees. Unfortunately, most of these proposals were not accepted by the European health authority.

The document released to the press today is on the SCoPAFF's agenda for its Plant Health section's next meeting. The Committee had blocked the implementation of Bee Guidance 2013 for years.

"For years, environmentalists have argued for a more ambitious and proactive document offering real protection for pollinators. Now the ball is in the court of the SCoPAFF, which will decide the future of this new document in complete secrecy. One thing is certain: these protocols will not be enough to halt the ongoing collapse of pollinators," says Nicolas Laarman, Managing Director of POLLINIS.

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