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# European Bees Under Peril as Protection Goals for Risk Assessment of Pesticides Might Paint a Bleak Future

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The Standing Committee on Plants, Animals Food and Feed (SCoPAFF) composed of representatives of the European Commission and Member States met once more on July 16 and 17. With the participation of the European Food Safety Authority (EFSA), they discussed the Bee Guidance Document, and the Specific Protection Goals defining what level of effects of pesticides are considered acceptable. EFSA proposed four different approaches to Member States for the determination of Specific Protection Goals (SPGs) [1] (which establish the threshold of acceptance for the effects of pesticides on the environment and non-targeted species). **However, all four scenarios seem to lead to less-than-ideal results for the future of bees. BeeLife opposes the newly proposed approaches (numbers 1, 2 and 4) presented by EFSA and denounces the high risk of continuing to block the efforts to adopt an improved risk assessment for the protection of bees in Europe.**

**The original Bee Guidance document by EFSA had already been published in 2013** [2] **without real implementation because of political blockage by Member States and "false" arguments** [3]. After seven years of countering efforts by some Member States, EFSA was asked to review its own document and propose a new approach. Both Member States and EFSA are now disputing the future implementation with concerning changes.

Besides the internal problems to EFSA's approach, there is also a fundamental issue in the process to define SPGs. The European Commission, while leading the definition process of SPGs, has been directly engaging with stakeholders for the future of SPGs. Nevertheless, this engagement has become an information platform, with no bidirectional communication. Instead of actively listening to stakeholders, the Commission is limiting the cooperation for the definition of SPGs to Member States, excluding stakeholders from the process. Not only is this a disappointing result, limiting the active participation of European citizens, but it dismisses direct insights from the field.

Considering the recent reports by the European Court of Auditors, denouncing the impacts of the Common Agricultural Policy [4] and the inefficiency of measures to protect pollinators [5], the ongoing discussions in SCoPAFF send a negative message. Ongoing discussions and EFSA's proposal for SPGs cast serious doubts on their effectiveness to achieve the EU's ambition for a sustainable future.

**BeeLife regrets the time pressure applied to EFSA to develop its recommendations. Such pressure has direct negative impacts.** For instance, the BEEHAVE model (a computer model used to simulate the development of a honeybee colony) is established as the model to be used in some of the approaches presented by EFSA. Although scientifically published, the pesticide industry has been directly involved in its development and it is persistently promoted by the European Crop Protection Association. Meanwhile, there are three other models currently under development in Europe run by independent scientists. One of them, on honeybee colonies, is even financed by EFSA, i.e. APISRAM. The other two models focus on bumblebee colonies and solitary bee populations. BeeLife proposes either to wait for the accomplishment of these latter models or to have the validations of estimations performed by BEEHAVE.

Noa Simon, Scientific-technical advisor of BeeLife remarks that "***if the decision would be on beekeepers and nature lovers, the acceptable level of impact of pesticides on the colonies would be 0%. EFSA has been pushed to put forward approaches to set up SPGs in record time. In our opinion, what was proposed in 2013 continues being the most protective approach. It is astonishing how much time and resources this pesticide dossier is taking from public and private institutions. In a dossier based in such large uncertainties, the precautionary principle would imply the adoption of the most protective approach***".

EFSA's proposal presents four potential approaches. Nevertheless, none seems satisfactory to achieve an effective risk assessment that ensures sustainability for bees and their role in agriculture, beekeeping and healthy ecosystems.

**We introduce a brief description of each of the approaches and provide arguments why they are insufficient or even detrimental for the risk assessment of the effects of pesticides on bees:**

- **Approach 1 – to establish an acceptable effect based on long-term colony survival**

  This approach is a catastrophe because it takes into consideration colony survival and dismisses the fact that bees do not just need to survive but also to multiply and develop. For beekeepers, colonies that survive are insufficient to ensure their livelihood. This approach should be excluded.

- **Approach 2 – to derive threshold of acceptable effect on colony size based on their natural variability**

  The second approach is based on background mortality, but the methodology is problematic because it is very difficult and resource-intensive to determine the proportion of variability that depends only on pesticides. Bees depend on the environment and climate and the variation in these parameters may mask subtle effects that pesticides can create on populations, hiding their negative effects. In addition, the interactions between pesticides and other health stressors of colonies (such as pathogens/parasites, nutrition, etc.) are even more variable. As a result, even if variability is inherent from nature, this approach increases the acceptability of bee mortality linked to pesticides.

  Furthermore, it raises the question on what a control colony is. In the current proposal the definition of a control colony is unclear. For BeeLife, a control colony is one that is exposed to the minimum stressing factors, with no pollutants, plenty of resources at its disposal, low pathogen/parasite loads, etc. Hence, this approach is extremely theoretical and lacks field validation.

  Finally, BeeLife questions why risk assessors would support this option if it is not to accept the effects linked to pesticides as natural. For instance, beekeepers are exposed to the environment and climate as much as crop producers. Yet, there is no justification for crop farmers to avoid variability in their production (by using pesticides) while beekeepers are obliged to accept it in their means of production.

- **Approach 3 – based on predefined acceptable levels on colony/population size.**

  In the report of the workshop 30 June 2020 about the second consultation of risk managers on the review of the guidance on the risk assessment of plant protection products for bees, the Commission uses ambiguous terminology in their communication to the Member States inviting to think that beekeepers have accepted the 7% as a threshold proposed in the EFSA Bee Guidance Document. In their report they stated "*[…] The percentages of acceptable level is set at 7% in the EFSA 2013 Bee Guidance Document based on expert judgement considering the perception of beekeepers what is a negligible (i.e. undetectable) effect.*" It must be clarified that beekeepers have expressed their rejection to this percentage in the open consultations for the text of the Guidance Document, but their complaints remained unheard.

- **Approach 4 – based on levels of acceptable impact on the provision of the ecosystem services.**

The fourth approach is too challenging, with high levels of uncertainty on the quality of the outcome. This approach is based on too many approximations and hypotheses that will need to be validated in the field.

- **Recovery Option**

  The recovery option proposed to the Member States invites to be less protective in the risk assessment because, anyway, bees have the potential to recover from an impact caused by pesticides. This option is theoretical and has as a basic hypothesis that all the conditions needed for recovery are present in the landscape where pesticides are used. We cannot agree on this, mainly because the areas with the largest potential of pesticide use are also the areas that are affected the most by landscape homogenisation and lack of habitat.

After years of Member States postponing and sabotaging state-of-the-art measures to provide an adequate risk assessment for bees, the current discussion is shifting towards maintaining a detrimental status quo, one that prioritizes uncertainty and steers away from robust recommendations by scientists and field observations. BeeLife advocates that Member States finally adopt 2013's Bee Guidance Document with its proposed SPGs. We have already lost seven years in this process of denial, it is time to respond to the challenges and step up for the future of bees.

References:

[1] EFSA. 2013. Guidance on the risk assessment of plant protection products on bees (Apis mellifera, Bombus spp. and solitary bees). https://www.efsa.europa.eu/en/efsajournal/pub/3295

[2] BeeLife. 2019. When Science and Biodiversity Meet Economic Interests. https://www.bee-life.eu/post/publication-when-science-and-biodiversity-meet-economic-interests

[3] EFSA. 2020. Review of the Guidance Document for the risk assessment for bees Supporting document for Risk Managers consultation on Specific Protection Goals for bees. https://assets.documentcloud.org/documents/6988437/EFSA-Consulting-ScoPAFF-on-Bee-Guidance-Juli.pdf

[4] European Court of Auditors. 2020. Special Report 13/2020: Biodiversity on farmland: CAP contribution has not halted the decline. https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=53892

[5] European Court of Auditors. 2020. Special report No 15/2020: Protection of wild pollinators in the EU: Commission initiatives have not borne fruit. https://www.eca.europa.eu/en/Pages/NewsItem.aspx?nid=13925

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NOTE TO EDITORS:

BeeLife European Beekeeping Coordination is an NGO initially formed by professionals of the beekeeping sector from different countries of the European Union. BeeLife works for the protection of pollinators in Europe, highlighting their value for nature and people. With over 20 members (beekeeping and farming associations) from 9 different European countries, BeeLife links policy, science and field observations to promote a more sustainable future for pollinators and their role in ecosystems.