







FRENCH BEEKEEPERS AGAINST SYSTEMIC INSECTICIDES **A25-YEAR** FIGHT

FRENCH BEEKEEPING SINCE 1995: A DRAMATIC SITUATION

At the beginning of the 1990s, the neonicotinoids insecticides are introduced in France. Since then, about 300 000 hives perish each year, and have to be reconstituted. Mortality rose from 5% to 30% 1. Honey yields per hive are significantly reduced halving the French honey production in 20 years. At the same time, French imports of honey have exploded.

FRENCH HONEY PRODUCTION TREND (in thousands of tons)

25 20 15 10 1997 2004 2010 2011

FRENCH HONEY IMPORTS TREND (in thousands of tons)

Sources: GEM, Protéis, FranceAgriMer and UNAF



STRONG MOBILIZATION OF BEEKEEPERS...

> THE SCIENTIFIC EVIDENCE OF TOXICITY IS ACCUMULATING

From the beginning, producers of these new insecticides denied their effects on bees: 'bees don't reach the molecule', 'ghosting is well under control', 'doses are harmless'...

But faced with these words, more and more studies have gradually confirmed beekeepers observations: imidacloprid is found in both pollens and nectar²; the products are very persistent and toxic at infinitesimal doses in pollen and nectars 3.

As soon as 2003 and 2004, a scientific and technical committee set by the French government concluded that imidacloprid and fipronil led to 'worrying risks to bees', 'in agreement with beekeepers' observations 4. Ten years later, those results have been confirmed by the European Food Safety Authority (EFSA) 5.

> A BITTER LEGAL BATTLE

The French government has demonstrated a high inertia. Consequently, French beekeepers decided to engage in a legal fight to prohibit those products and enforce their rights. Between 1998 and 2019, the Federation UNAF initiated or intervened in over 20 proceedings 6 against those toxic insecticides authorizations, their producers or the French government.

> AN UNPRECEDENTED MEDIA MOBILIZATION

- > Beekeepers demonstrations gathering the whole profession and involving a large coalition of environmental and farmers' organizations.
- > Since 2005, an environmental awareness campaign called 'The bee, sentinel of the environment' 7. A significant number of hives have been placed on the buildings of local authorities or companies. This created real opportunities to show the role of pollinators and to evidence the causes of their vanishing.
- > Mobilization of elected representatives: from 2010, the Federation UNAF initiated a support committee for bees and beekee**pers,** composed of deputies who are committed to defending the interest of the pollinators 8.

SIGNIFICANT RESOURCES DEPLOYED

- > Important legal fees (more than 600 000 euros)
- > Significant human resources: the Federation UNAF recruited a team of ten employees, among them a press manager and project managers.
- > Permanent exchanges with scientists
- > Active involvement in European lobbying: the UNAF takes part in BEE LIFE, a European beekeeping coordination aiming at studying the impact on bees of pesticides and at questioning European policy-maker.
- > From 2010, creation of a Support Committee of the elected representatives to the Bee, gathering members of French and European parliaments: nearly 180 parliamentarians have joined the Committee to this day.

...WHICH LED TO DIFFICULT WINS, CONSTANTLY CHALLENGED

In several years, the scientific, legal and media battle has achieved some victories.

Suspension of insecticide Gaucho (imidaclopride) on sunflower⁹

Suspension of Gaucho on corn¹⁰

France bans the use of fipronil in French fields¹¹.

The highest administrative court cancels the autho-2011 rizations of Cruiser (thiamethoxam) on corn for 2008, 2009^{12} and 2010^{13} .

The European Food Safety Authority (EFSA) finally admits that the assessment guidance of the pesticides impact on bees suffers from many shortcomings 14.

The French Minister of Agriculture withdraws the authori-2012 zation of Cruiser on canola and initiates at the European level a procedure to reassess the impact on bees of three active substances from the neonicotinoids family 15.

The European Union partially bans the use of imidacloprid, thiamethoxam, clothianidine and fipronil 16. Uses on crops considered to be unattractive to bees (such as straw cereals) remain authorized, despite the large areas concerned and the long persistence of these substances.

The French legislator adopts the Biodiversity Law and totally prohibits the agricultural uses of neonicotinoids in France from September 1st, 2018 7. This ban applies to 5 active substances: acetamiprid, clothianidin, imidacloprid, thiacloprid and thiamethoxam.

France authorizes on many crops two pesticides with 2017 a new generation neonicotinoid: the sulfoxaflor¹⁸.

A French administrative tribunal suspends the authori-2017 zation of the sulfoxaflor based pesticides 19. The highest French administrative court confirms this decision in February

The European Union totally bans outdoor uses of imi-2018 dacloprid, thiamethoxam and clothianidin²⁰. The ban has entered into force since December 2018.

The French legislator extends the scope of the neo-Oct. nicotinoids ban to molecules with the same mode of **action** ²¹ (sulfoxaflor and flupyradifuron).

TODAY, THE BATTLE CONTINUES IN FRANCE, IN EUROPE, AND WORLDWIDE...

IN FRANCE

... because these victories are constantly threatened: pesticide manufacturers have indeed attacked the French ban of neonicotinoids and a trial is pending before the highest administrative court ²².

IN EUROPE

... because many states are adopting **abusive derogations from the European ban** of neonicotinoids 23;

... because pesticides are poorly evaluated before their European authorization. While the European Food Safety Authority (EFSA) proposed in 2013 a new guidance document taking into account all routes of exposure of bees, chronic toxicity, sublethal effects or effects on wild bees 24, the European states have voluntarily refused to implement these recommendations, choosing to favour pesticides over protection of pollinators 25. Europe is therefore deliberately leaving the door open to future pesticides that are at least as toxic as neonicotinoids.

IN THE WORLD

- ... because it is the most widely used insecticide class on the planet; ... because neonicotinoids and fipronil account for one third of the
- global insecticide market.

I - EPILOBEE report 2012-2013 - Plateforme ESA, « Mortalités des colonies d'abeilles domestiques pendant l'hiver 2017-2018, Premiers résultats », 24 October 2018

2 -J. M. Bonmatin et al., « A LC/APCI-MS/MS Method for Analysis of Imidacloprid in Soils, in Plants, and in Pollens », Anal. Chem.20037592027-2033, April 2003 3 - M. E. Colin et al., « A Method to Quantify and Analyze the Foraging Activity of Honey Bees: Relevance

Toxicology, vol. 47, no 3, September 2004, p. 387-39 4 - Comité Scientifique et Technique de l'Etude Multifactorielle des Troubles des Abeilles (CST), « Imidaclopride utilisé en enrobage de semences (Gaucho®) et troubles des abeilles, Rapport final », 18 September 2003

to the Sublethal Effects Induced by Systemic Insecticides », Archives of Environmental Contamination and

5 - EFSA, « Conclusion on the peer review of the pesticide risk assessment for bees for the active substances clothianidin, thiamethoxam, and imidacloprid », 2013: http://www.efsa.europa.eu/en/press/news/130116

6 - To learn more: UNAF press file available on the website, October 2018

7 - www.abeillesentinelle.net 8 - www.comiteelusabeille.org

9 - 22 January 1999 10 - 25 May 2004

11 - Ministerial orders of 6, 15 et 19 April 2005 banning marketing and use of plant protection products containing the « fipronil » active substance

12 - Conseil d'Etat, 16 February 2011, Cruiser, Union Nationale de l'Apiculture Française

13 - Conseil d'Etat, 3 October 2011, Cruiser 350, Union Nationale de l'Apiculture Française

14 - EFSA, « 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) », 23 May 2012

15 - Ministerial order of 24 July 2012 banning the use and marketing of crucifer seeds treated with plant protection products containing thiamethoxam

16 - Commission Implementing Regulation (EU) No 485/2013 of 24 May 2013

17 - LAW n°2016-1087 of 8 August 2016 - art. 125 - Art. L.253-8 of the Code rural 18 - Anses, 27 September 2017, authorization of the plant protection products Closer and Transform

19 - Tribunal Administratif de Nice, 23 November 2017, Ordonnances de référé, Closer and Transform AND Conseil d'Etat, 15 February 2018, Closer and Transform

20 - Commission Implementing Regulations (EU) of 29 May 2018 No 2018/783, 2018/784, 2018/785 21 - LAW n° 2018-938 of 30 October 2018 - art. 83

22 - UNAF press release, 7 November 2018, « L'interdiction française des néonicotinoïdes menacée par le lobby des pesticides: I'UNAF sonne l'alerte! »

23 - Report of 4 European NGOs (Client Earth, PAN-Europe, Bee Life and Romapis), Bee emergency call, 2017 24 - EFSA, Guidance on the risk assessment of plant protection products on bees (Apis mellifera, Bombus spp. and solitary bees), 27 June 2013

25 - Greenpeace Europe press release, 23 January 2019, « Leak: European governments pave way for bee-killing



