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DG SANTE, E.4 - Pesticides and Biocides
European Commission
1049 Brussels

11th July 2019

Re: Vote on Bee Guidance, national emergency authorisations at the Standing Committee on 16-17th July

Dear members of the Standing Committee on Plants, Animals, Food and Feed,

At the Standing Committee meeting of 16-17th July, you will be asked to vote on an amendment to the Uniform Principles for the evaluation and authorisation of plant protection products, as well as on two measures to prevent the repetition of unjustified emergency authorisations of bee-harming neonicotinoids.

(1) Amendment to Commission Regulation (EU) No 546/2011

The proposed amendment aims to better protect pollinators from risks posed by pesticides. However, it only covers risks to honeybees arising from acute exposure and fails to address risks arising from chronic exposure and risks to larvae, as well as potential effects on bumblebees and solitary bees. As a result, these risks will not be considered in the EU approval of active substances, or in the authorisation of formulated products.

We ask you to reject the amendment proposed by the Commission because it fails to provide adequate protection to pollinators. It also fails to bring the Uniform Principles in line with EU Regulation (EC) No 1107/2009, which states that pesticides must have "*no unacceptable acute or chronic effects on colony survival and development, taking into account effects on honeybee larvae and honeybee behaviour*".

Pesticide manufacturers are obliged to submit chronic toxicity tests, according to Commission Regulations (EU) No 283/2013 and 284/2013. This means that the necessary data is available and there is no reason to ignore it in the decision-making process.

Our organisations are calling for the implementation of state-of-the art bee safety standards that reflect current scientific knowledge on how pesticides can endanger bee health. Many European citizens support our demand: A [SumOfUs](#) petition has already been signed by more than 230,000 people, and POLLINIS' petitions (at [national](#) and [European](#) level) have

gathered more than 250,000 signatures. And more than [5 million people](#) across the world have repeatedly called on European decision-makers to protect the bees.

Last spring, we learnt with great relief that the Standing Committee voted in favour of a ban on all outdoor uses of three pesticides of the neonicotinoid family, Imidacloprid, Clothianidin and Thiamethoxam. However, these three pesticides are not alone in posing a risk to bees. Other substances have also been shown to impact bees' health as a result of acute or chronic exposure. Worryingly, these substances are now used to replace the banned neonicotinoids.

Only if all pesticides are regulated to the same high standards as these three neonicotinoids, will the EU be able to effectively protect bees from harmful pesticides.

(2) Commission Implementing Decisions on the non-repetition of emergency authorisations by Lithuania and Romania

The proposed decisions aim to limit national governments' excessive use of emergency authorisations (Article 53 of EU Regulation (EC) No 1107/2009).

We ask you to support these two measures proposed by the Commission. Whilst we believe that many more emergency authorisations are unjustified, we acknowledge that the Commission is finally stepping up against this harmful practice, which undermines the EU's efforts to protect bees.

In addition, we ask you to support bans on two harmful pesticides currently up for decision in the Standing Committee on Plants, Animals, Food and Feed: **Sulfoxaflor** and **Thiacloprid**.

We trust that you are as concerned as we are about the multitude of threats that bees and other beneficial insects are facing in Europe. Bees are indispensable for our food production. They pollinate over 80% of food crops, including the healthiest ones such as fruits, vegetables and nuts. Having more bees and more diverse pollinator species allows farmers to increase their yields and income. The elimination of pesticides that pose a direct risk to their health is a crucial and achievable goal that the EU should consistently pursue.

As a member of the Standing Committee on Plants, Animals, Food and Feed we urge you to take responsibility for protecting pollinators to safeguard the future of Europe's food production capability and biodiversity.

Yours sincerely,

Jorgo Riss, Director, Greenpeace European Unit

Francesco Panella, President, BeeLife

Walter Haefeker, President, European Professional Beekeepers Association

Martin Dermine, Policy Officer, Pesticide Action Network Europe

Nicolas Laarman, Chief Executive of Pollinis

Hannah Lownsborough, Chief Executive of SumOfUs

Antonia Staats, Senior Campaigner, Avaaz