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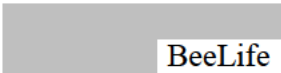
Dear ,

Thank you for your two letters of 20 May 2021 in which you express concerns regarding the defence of health and environmental quality in the ongoing Common Agricultural Policy (CAP) negotiations and the ongoing discussions on the setting of Specific Protection Goals for bees in the Standing Committee on Plants, Animals, Food and Feed.

As regards your expectations for the outcome of the reform of the CAP, you are certainly aware that the proposal from the Commission is currently negotiated between the Council and the Parliament who are in the process of seeking final compromises. The Commission's role at this point is to support the co-legislators in finding such compromises while being mindful of its own ambitions when adopting its proposal.

With regard to the specific protection goal for honeybees, your organisation is member of the dedicated stakeholder consultation group which the European Food Safety Authority (EFSA) set up to accompany the process for the review of the Bee Guidance Document and is regularly consulted. To name one example of such consultation, Ms Noa Simon-Delso attended an information session on 13 January 2021 where EFSA explained the outcome of its simulations of the natural variability of honey-bee colony size development.

During further discussions in a dedicated meeting with Member States on 23 February 2021 and the Standing Committee on Plants, Animals, Food and Feed in March 2021, all Member States agreed that the results of EFSA's simulations of the variability of honey-bee colony size were more conservative than the variability observed in nature (i.e. the simulated variability is smaller than what has been observed in field studies for honey-bee colonies not exposed to pesticides). Therefore, they agreed that setting a threshold for a maximal permitted reduction in honey-bee colony size due to pesticides within this simulated range

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would offer sufficient protection. Member States also agreed to take account of the practicalities of field studies, as otherwise it will not be possible to actually measure whether or not the protection goal is achieved for a substance under evaluation.

As an agreement among the Member States seemed difficult at technical level, I proposed in a letter to the Chair of the European Parliament's Committee on the Environment, Public Health and Food Safety and the Minister of Agriculture of Portugal, the Member State holding the presidency of the Council, to add this matter to the agenda of the June AGRIFISH Council for a public discussion in full transparency among Ministers<sup>1</sup>.

Please let me underline that a 0% threshold for acceptable impacts from exposure to pesticides, as proposed in your letter, cannot be implemented in practice because it does not consider that honey-bee colonies naturally vary in size. Honey-bee colonies, just as any biological entity, will always vary in size even under pristine conditions and this also occurs during experimental field studies, for which replicates are needed. Such variation needs to be considered in order to reach statistically and biologically meaningful results.

Considering that the guidance regarding risk assessment for bees still applicable today, which is the Guidance Document on Terrestrial Ecotoxicology from 2002, allows for a 20-25% decline in colony size in field studies and the full range of the natural variability simulated by EFSA is around 23%, I proposed in the above-mentioned letter to the Chair of the ENVI Committee and the Portuguese presidency as a starting point for the discussion a maximum permitted 10% colony size reduction as the specific protection goal. This level is far below the full range of the simulated natural variability by EFSA, and thus ambitious, while still technically feasible so that it can be implemented in practice.

I look forward to set protection goals for bees on a stronger scientific basis that are both ambitious and feasible in reality.

Yours sincerely,

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<sup>1</sup> [https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides\\_bees\\_letter\\_mep-pt-pres\\_en.pdf](https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_bees_letter_mep-pt-pres_en.pdf)