



EUROPEAN COMMISSION  
 DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY  
 Food and feed safety, innovation  
**Pesticides and biocides**

Brussels  
 SANTE.DDG2.E.4.002/[REDACTED]2020)7755565

Dear [REDACTED]

**Subject: Your letter of 1<sup>st</sup> October on the review bee guidance document**

Thank you for your above-mentioned letter to Commissioner Kyriakides, who asked me to reply on her behalf.

You request a detailed response to your 10 points of critique. However, as most of them relate to the work that is currently conducted by EFSA (and not by the Commission) this is not possible at this point in time. Please be informed that we have forwarded your letter to EFSA for due consideration in the ongoing process for the review of the EFSA 2013 Bee Guidance Document. In particular, the next background document for consultation of risk managers that EFSA is preparing should provide answers and explanations to the relevant points raised. When finalised, the document will be made available to risk managers, stakeholders and the general public, ahead of a further workshop to be organised in due time.

I will, therefore, only comment on some of the broader points raised in your letter. First, EFSA has defined a clear process for the review of the guidance document, involving independent experts, Member States and stakeholders<sup>1</sup>. EFSA has also made all important documents available to the public<sup>2</sup>. The Commission has organised two specific workshops for consulting Member States experts based on the documents prepared by EFSA and so far there has been no decision taken on the protection goals for bees and we have not seen indications that Member States would *'give priority to getting more pesticides approved over the protection of bees'* as you write.

We agree that it is also necessary to set protection goals for wild bees and would like to invite you to share your thoughts on how this could be done. EFSA has found that information and scientific publications in relation to wild bees are very scarce.

We also agree with your observation that it is important to consider cumulative exposure to multiple pesticides in the risk assessment. As stated in the report on the REFIT

<sup>1</sup> [https://www.efsa.europa.eu/sites/default/files/event/Bee\\_Guidance\\_review.pdf](https://www.efsa.europa.eu/sites/default/files/event/Bee_Guidance_review.pdf)

<sup>2</sup> <https://www.efsa.europa.eu/en/news/bees-and-pesticides-third-consultation-guidance-review>

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evaluation of the pesticides legislation, it is important to develop an appropriate methodology for conducting such assessments, taking into account the progress that EFSA has made in this regard in relation to pesticides residues in food. I take note of your suggestion to achieve this via an additional safety factor (10).

Let me conclude by underlining that the Commission shares your goal to achieve a high level of protection for bees and the broader environment as envisaged in the Plant Protection Products Regulation.

Yours faithfully,

