

Copa and Cogeca  
CIBE

Workshop on the  
revised EFSA  
Guidance on the risk  
assessment for bees

5 October 2022

## GD Summary

- The importance of bees
- Evidence-based approach to improving risk assessment
- Community agreement (or use of internationally agreed test guidelines) vital to provide clear, predictable & consistent regulatory framework

## GD1 Introduction

- **Outcomes ‘should lead to measurable benefits’<sup>1</sup>**

<sup>1</sup>EFSA charter D01.01-PREV-02 Charter Bees\_GD.pdf

## GD1.4 Pathways of exposure for bees

- Assumes contamination always happens – ignoring effort farmers & growers make to minimize emissions to the environment
- Contact scenario - what is the realistic risk of this occurring? What proportion of the bee population does this impact?

## GD3.1 Specific Protection Goals

- Evidence-based maximum permitted level of colony size reduction should be c.20%
- <7% colony reduction figure for negligible effect – not sufficiently evidence-based; not practical <sup>1</sup>
- SPG 10% colony size reduction – more political than evidence-based
- What are the implications? How will revised BG affect availability of PPPs? Low risk substances? Biopesticides? Agricultural & horticultural production & competitiveness?
- Spatial scale ‘edge of field’ location for honey bees – lacks realism

<sup>1</sup>Bakker, F. 2016

## GD3.3 Risk assessment process

- Risk Mitigation Measures ✓

## GD4.1 Agricultural practices

- List of agronomic/growing-practices - include time between sowing PPP treated seed & start of flowering

## GD4.3 Exposure scenarios

- Worst case exposure scenarios – additional conservatism

## GD4.3.1 Treated crop

- lack of clarity about crops 'usually harvested before flowering'
- e.g. coriander leafy herb, coriander seed – 1 plant, 2 crops
- Plant = crop  - crops harvested before or after flowering are different crops – no need for 'crop is usually harvested before flowering'
- >95% EU sugar beet acreage is the sugar beet root crop, <5% is the sugar beet seed crop
- Within the guidance documents – different crops must be dealt with clearly and differently

Table 5

**Expected number of honey bee colonies, bumble bee colonies, or solitary bee nests (out of the 1000) which are actively collecting pollen from different crops.**

Crop	Median	90% uncertainty interval
Sugar beet (seed)	100	10 to 280
Sugar beet (root)	No value because there is no pollen	


Table 6

**Attractiveness of a crop to honey bees, bumble bees, and solitary bees and the certainty of the classification**

Crop	Attractive	Certainty of being not attractive	Certainty of being not attractive
Sugar beet (seed)	YES	50.0%	50.0%
Sugar beet (root)	No	100%	0.0%



## GD4.3.2 Weeds in the treated field (1)

- In-field weeds should not be considered primary source of food for pollinators. Under GAP, weeds within cropped areas are kept to a practicable minimum
- Under GAP – sugar beet fields kept weed free up to BBCH 39 (complete crop cover)
- The main protection goal in the in-field space is crop production, not weed production
- Lack of data = 'Yes' 

## GD4.3.2 Weeds in the treated field (2)

- 1 weed in a field is considered significant
- All weeds assumed to be equally attractive to bees, at all times
- Multiple assumptions add layers of conservatism – multiple layers multiply

### GD4.3.3 Field margin and adjacent crop

- Assumptions on drift ignore farmers efforts to minimize emissions to the environment
- Multiple assumptions add layers of conservatism – making risk assessment increasingly unrealistic

## GD4.3.4 Succeeding crop

- Support a better understanding of realistic succeeding crop scenarios
- Cannot assume all succeeding crops are bee attractive & offer pollen & nectar that bees forage on
- Cannot assume residues always present in form readily taken up by roots of succeeding crop
- Assumption that all active ingredients translocated to pollen & nectar

GD5.2.3 Body surface factor

GD5.3.3 Pre-flowering factor

GD5.3.7 Landscape factor

## Conclusion

- Simplistic assumptions & unacceptable levels of conservatism risk creating a risk assessment process that is detached from reality
- What are the impacts of the guidance on PPP availability and ability to control crop pests, weeds & diseases?
- Food and crop producers need to have confidence in the regulatory framework - this requires an evidence-based, clear, predictable, consistent & agreed risk assessment process
- **Outcomes 'should lead to measurable benefits'**