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Brussels,

Dear Chair, dear Minister,

I am sure you will agree with me that, because of their key role in agriculture, food supply and ecosystems in general, honey-bees and other pollinators are an important issue for all of us.

You are aware that the European Food Safety Authority (EFSA) has been conducting a review of its 2013 Guidance Document on the risk assessment of plant protection products on bees. EFSA undertook the review at the Commission's request and has been working on it for about two years. The Commission and EFSA have closely involved Member States and stakeholders in this open and transparent process<sup>1</sup>, which has now arrived at a crucial stage. We are now called to agree on a specific protection goal for honey-bees in terms of an acceptable reduction in colony size caused by pesticides. This agreement is vital to the protection of pollinators, as it would allow EFSA to finalise the review of the 2013 Guidance Document.

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<sup>1</sup> All relevant information is available on the Commission's dedicated website:  
[https://ec.europa.eu/food/plant/pesticides/protection-bees\\_en](https://ec.europa.eu/food/plant/pesticides/protection-bees_en)

Mr Pascal Canfin, MEP  
Chair of the Committee on the Environment,  
Public Health and Food Safety  
European Parliament  
Brussels

Ms Maria do Céu Antunes  
Minister of Agriculture  
Portuguese Presidency of the Council of the  
European Union

Let me recall that the currently applicable guidance document<sup>2</sup> for risk assessments for honey-bees dates from 2002. While it contains no specific protection goal in terms of acceptable colony-size reduction, the set-up recommended for conducting field studies on the impacts of pesticides would only allow to measure whether the decline is in the range of 20-25%.

The 2013 EFSA Guidance Document recommended a protection goal corresponding to a 7% reduction in colony size based mainly on expert analysis of what beekeepers would be able to observe in practice. For several years, the Commission proposed to have the 2013 Guidance Document endorsed by the Standing Committee on Plants, Animals, Food and Feed. However, this was not possible because most Member States concluded that it would not be feasible to conduct field studies in a set-up that could reliably measure such a small variation in honey-bee colony size.

In June 2020, EFSA proposed four potential approaches for setting the protection goal in the context of the review of the 2013 Guidance Document. Most Member States indicated a preference for an approach that takes into account the natural variability of colony size for honey-bees<sup>3</sup>, i.e. the fact that the size of honey-bee colonies varies throughout the year due to a range of factors other than pesticide exposure (such as weather, feed supply etc.). EFSA ran numerous simulations of the natural variability and presented the results<sup>4</sup> to Member States and stakeholders in January 2021. EFSA also presented detailed information on the set-up of field studies that would be required to be able to measure reliably a given reduction of colony size.

I am aware that coordinators in the European Parliament's ENVI committee have concerns about the scientific robustness of this approach, in particular the use of the BEEHAVE model for the simulation of bee colony development, and instead prefer to base the updated guidance on relevant elements of another model, ApisRAM. I would like to note that EFSA has recently published information<sup>5</sup> pointing to the fact that the relevant parts of ApisRAM to simulate bee colony behaviour will be at the earliest available in 2023 and will be fully developed only in 2025. Waiting for ApisRAM would thus lead to a considerable delay in improving the protection of bees.

At a meeting of 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 natural 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 an

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<sup>2</sup> [https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides\\_ppp\\_app-proc\\_guide\\_ecotox\\_terrestrial.pdf](https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_ppp_app-proc_guide_ecotox_terrestrial.pdf)

<sup>3</sup> Approach number 2 in the document published by EFSA, available at <https://www.efsa.europa.eu/sites/default/files/topic/EFSA-Supporting-document-for-RMs-in-defining-SPGs.pdf>

<sup>4</sup> EFSA published the results in December 2020 on its website : <https://www.efsa.europa.eu/sites/default/files/topic/review-guidance-document-bees-specific-protection-goals.pdf>

<sup>5</sup> <https://www.efsa.europa.eu/sites/default/files/2021-03/timeline-ApisRAM-development-final.pdf>

acceptable reduction in honey-bee colony size due to pesticides within this simulated range would offer sufficient protection. They also agreed to take account of the practicalities of field studies, as otherwise it would not be possible to actually measure whether or not the protection goal had been achieved.

At the same meeting, experts from four Member States considered that accepting a colony size reduction covering the full simulated natural variability (i.e. up to 23%) would offer sufficient protection. Experts from eleven Member States suggested a protection goal within a range of 10% to 12.8% of colony size reduction. Experts from four Member States indicated a preference for maintaining the same level of acceptable colony size reduction as in the 2013 EFSA Guidance Document (7%), referring also to political considerations. Experts from four Member States did not express any preference on the acceptable level of colony size reduction.

In your letter of 15 March 2021, as Chair of the European Parliament's Committee on the Environment, Public Health and Food Safety, you reiterated the Committee's support for the 7% target and called for the issue to be taken up at political level. In your letter of 26 April 2021, as Presidency of the Council, you confirmed the need to find an ambitious and feasible way forward.

In light of the foregoing, it is clear that an agreement among the Member States that will meet with the European Parliament's approval cannot be found at technical level.

For this reason, I would therefore like to propose to add this matter to the agenda of the June AGRIFISH Council for a public discussion among Ministers on the level of the protection goal for honey-bees in terms of colony-size reduction.

I would like all three institutions agreeing on a protection goal that is ambitious and allows raising the level of protection for honey-bees significantly above the current level, which is still based on the guidance from 2002. Mindful of the earlier concerns of most Member States about the 7% protection goal proposed in the EFSA 2013 Guidance Document (in particular about the feasibility of field studies to measure whether it has been achieved) and of the positions expressed by Member States' experts in the Standing Committee in March 2021, as well as of the European Parliament's preference and the information compiled by EFSA as to the set-up of field studies that could measure with sufficient exactitude honey-bee colony size reductions, I would like to propose as a starting point for the discussion a 10% colony size reduction as the specific protection goal. This level is both very ambitious (as the guidance still applicable today allows a 20-25% decline) and technically feasible.

The Commission is ready to put forward a lower colony size reduction level if Member States consider it viable from a technical point of view and there is political support among Member States and the European Parliament.

It is essential that Member States and the European Parliament find a common position that allows us to increase the level of protection of bees. Another disagreement between the two institutions will only lead to further delays and continuation of the non-protective status quo.

Let me also reassure you that when new scientific evidence emerges or better models become available to simulate the impacts of pesticides on bees, such as ApisRAM, the Commission will request EFSA to conduct a further review of the Guidance Document.

I look forward to working with you to find a political way forward, establishing a colony reduction target that is both ambitious and workable.

Yours sincerely,