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Brussels, 17 May 2021

Dear ,

Thank you for your letter of 24 March 2021 in which you express concerns about the ongoing discussions in the Standing Committee on Plants, Animals, Food and Feed on the setting of specific protection goals for bees.

I note your request for a transparent discussion and agree that transparency is key for the acceptance of the revised Bee Guidance Document. The Commission therefore explicitly included in the mandate to EFSA on the review of the 2013 Bee Guidance Document the requirement to keep stakeholders closely informed throughout the process.  from your organisation was selected by EFSA as a member of the dedicated stakeholder consultation group. This enables you to provide directly input to the EFSA scientific working group which works on reviewing the document. Furthermore, your organisation was invited to a dedicated information session on 13 January 2021, during which EFSA explained in detail the modelling of bee colony size variability performed and the results obtained. The Commission also recently launched a website¹ on the review of the Bee Guidance Document including links to the supporting documents and minutes of meetings, and on which also replies to letters of public interest are made available. Please note that this letter will also be made available on that website.

As mentioned in my reply of 27 April 2021 to the letter you sent jointly with other organisations², EFSA explained during the information session of 13 January 2021 the outcome of its simulations of the natural variability of honey-bee colony size development. During further discussions in a dedicated meeting on 23 February 2021 and the Standing

¹ https://ec.europa.eu/food/plant/pesticides/protection-bees_en

² Our reference: Ares(2021)2809008

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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 would offer sufficient protection. Member States also agreed to take account of the practicalities of field studies, as otherwise it would not be possible to actually measure in the field whether or not the protection goal had been achieved.

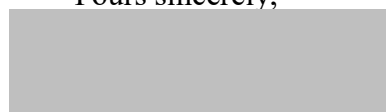
At that meeting, four Member States considered that a colony size reduction covering the full simulated natural variability (i.e. up to 23%) would be acceptable and eleven Member States suggested a protection goal within a range of 10% to 12.8% of colony size reduction. Four Member States indicated a preference for maintaining the 7% colony size reduction as in the 2013 EFSA Guidance Document. Four Member States did not express any preference.

Please be also informed that in a letter of 15 March 2021 the Chair of the European Parliament's Committee on the Environment, Public Health and Food Safety reiterated the Committee's support for a specific protection goal of 7% and called for the discussion to be taken up at political level.

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. I therefore proposed in a letter³ to the Chair of the European Parliament's Committee on the Environment, Public Health and Food Safety and the Portuguese Presidency to add this matter to the agenda of the June AGRIFISH Council for a public discussion in full transparency among Ministers.

I would like to conclude with emphasising my commitment to present an ambitious and protective proposal for the protection of bees following the completion of the update of the guidance by EFSA. I therefore proposed in the above mentioned letter to the Chair of the Environment 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 ambitious as the guidance still applicable today allows for a 20-25% decline in colony size in field studies and it is far below the full range of the natural variability simulated by EFSA, while still technically feasible so that it can be implemented in practice.

Yours sincerely,



³ https://ec.europa.eu/food/sites/food/files/plant/docs/pesticides_bees_letter_mep-pt-pres_en.pdf