


# Comments of Southern zone on the EFSA revised guidance on the risk assessment of PPP (*Apis mellifera*, *Bombus spp.* and solitary bees)

Plant Protection Products Unit, INIA-CSIC (Spain)

@inia.csic.es





First at all, we would like to thank to the Working Group for the effort on the revision of the schemes of risk assessment on bees.

We only received comments from two SMMSS:

Croatia (HR)

Spain (ES)

# Comments received from Croatia (HR)

- **Croatia (HG)**

- *At the last meeting of the Standing Committee PAFF (May 2022), HR position regarding the threshold value for colony size reduction was that 10 % should be defined for bumblebees as it is for bees. In the draft GD the threshold is defined only for bees.*
- *Due to lack of data and different biology for solitary bees, HG agrees that the threshold stays undefined, as a **temporary solution** until further data becomes available and revision of the Guidance document can be made.*
- *Since the guidance document is intended to be used for chemical active substances, what should be done in case of **microbials**?*

# Comments received from Croatia (HR)

- **Croatia (HR)**
- *Several new parameters have been introduced in the new GD that were not considered in EFSA (2013):*
  1. *Pre-flowering factor*
  2. *Landscape factor*
  3. *DT50 in pollen and nectar as standalone parameters*
  4. *DT50 plant matrixes*
  5. *Number of applications*
  6. *Interval between multiple applications*

*HR supports addition of these parameters to the risk assessment. “*

# Comments received from Spain (ES)

- **Spain (ES)**

- 13. Risk mitigation measures*

- *In Chapter 13 it is said: “When a high risk to bees foraging treated weeds is predicted, it is suggested not to use the “risk phrase” SP8: Do not apply when flowering weeds are present./Remove weeds before flowering./ due to the possible adverse effects on biodiversity.”*

*This would be an indirect effect, which would not be covered by the scope of the GD as stated in chapter 2 .*

*The change of the Spe 8 phrase is a risk management competence.*

# Comments received from Spain (ES)

- **Spain (ES)**

*Annex C Point 2. Statistical methodology for higher tier studies*

- *Spain considers that an experimental validation/calibration of the equivalence test and of the undefined threshold approach is necessary.*