

Bee Guidance Document Saga: 12 (17) years later, still not implemented.

*EP, Brussels
15/07/2025*



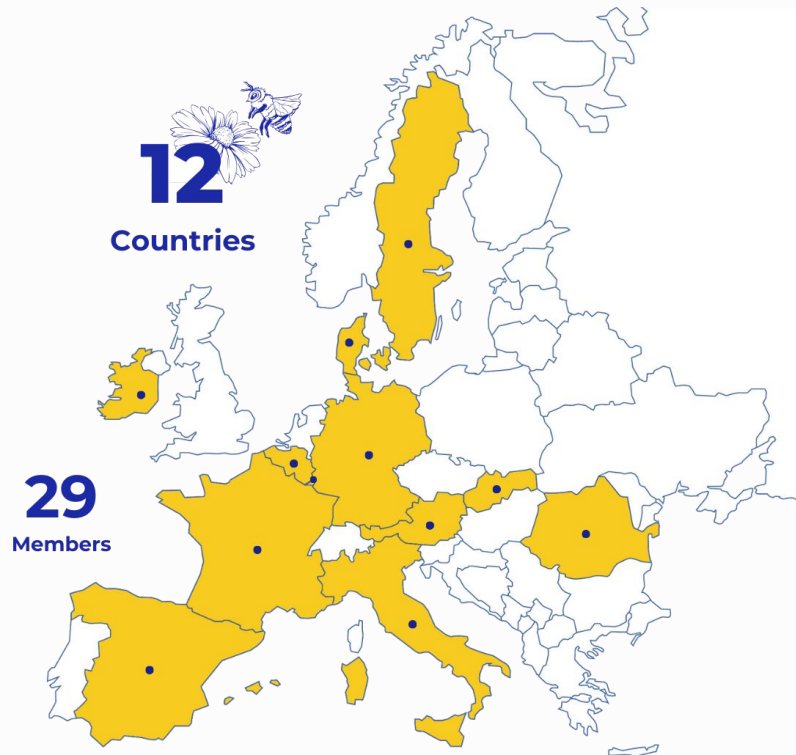
MEMBERS

Meet our members

We represent associations and cooperatives of beekeepers and farmers across **12 EU countries**.

Beelife represents a leading body for the sector within the EU landscape with about **44.5%** of the members, **34%** of the colonies and **56%** of the total honey production.

Our members are our most valuable asset, they are our eyes in the field, providing firsthand insight and grounding our work in real-world challenges and experiences.



Legal framework

Regulation (EC) No. 1107/2009

Legal requirement for Risk Assessment on bees (HB and others)

Regulations (EC) No. 283/2013, 284/2013 and 546/2011

Data requirements and uniform principles

Acute, chronic toxicity

Adults and larvae.

Effects on development, behaviour and exposure through several ways

Nectar, pollen, guttation/water, dust, honeydew, etc.



Until 2013

Beekeepers

'90s-2000 - Drastic Colony Losses

Scientific research on chronic and sublethal effects of neonicotinoids and analytical methodologies starts.

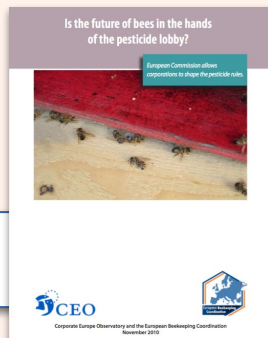
2008-09 - Beekeepers get organised

Creation of the Task Force European Beekeeping Coordination
Participation to working groups where Pesticide Risk Assessment methodology is established (ICPPR).

2010 - 2 Milestones

- Methodology not adapted to scientific knowledge.
- Conflict of Interest.

Environmental Risk Assessment
for Honeybees
State of play and Future Proposals



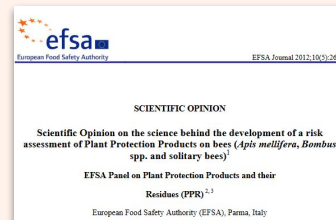
2011 - EFSA starts working

EFSA Bee Expert group is formed.

EFSA

2012 - 1st EFSA Milestone

- Confirmation - Methodology not adapted to scientific knowledge.



2013 - 2nd EFSA Milestone



- Acute & chronic toxicity.
- Risk to **larvae, bumblebees, and solitary bees.**
- Multiple exposure route
- **Never officially adopted** - opposition from a majority of MSs

2013 - Today

Decision makers

2013 - 2019 - Member States block full implementation

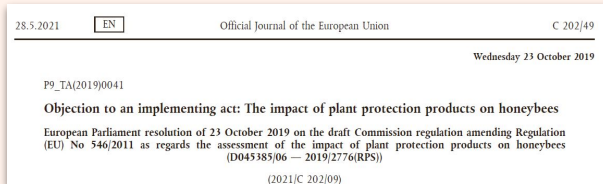
Commission proposes a **watered-down amendment** to the Uniform Principles in 2019 (Omission of CHRONIC TOXICITY and LARVAL TOXICITY).

2019 - EP Resolution vetoes proposal

1107/2009 legally requires chronic toxicity to be considered.

EFSA's 2013 guidance reflects current scientific and technical knowledge.

Called for full implementation, not partial revision.



2018 and 2022 - Neonicotinoides and sulfoxaflor

Assessed with 2013 methodology

Unacceptable risks identified

Limit use to greenhouses

2026 - Update of Uniform Principles?

EFSA

2021 - EFSA reviews 2013 guidelines

EFSA Bee Expert group is formed

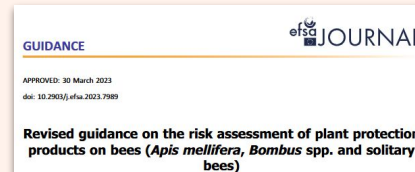
2022 - EFSA Reviews the SPGs

No political consensus on Uniform Principles



2023 - 3rd EFSA Milestone

- SPGs agreed
- Acute & chronic toxicity, sublethal
- Risk to **larvae, BB** and **SB**.
- Multiple exposure route (models)



Lessons learned

- **Important role to society of field practitioners like beekeepers,** who, with the support and collaboration of scientists and NGOs, put in motion a shift in the consideration of environmental health.
- Basis of decision making in science **takes too long when science/field is inconvenient (17 years).**
- The **system is not adapted to accept the unexpected.** Messengers of an imperfect system often get mistreated.
- **Main problem:** pesticide authorisation and use are legally separated.
- **In silo consideration of chemicals:** pesticides, biocides, veterinary products, pharmaceuticals, etc.
- Future - **Systems-approach for chemical authorisation and use.**





REGULATORY CONTEXT

Status Quo

Regulation (EC) No. 1107/2009 being discussed with a strong push from certain MS for more active substances (AS) availability, no withdrawal of AS without alternatives, encourage emergency authorisations when no alternatives are available, etc.

Key word: simplification...

Next process: Update of Methodology of RA for NTAs, non-target Plants, indirect effects.... - Will risk managers follow Science?

Team



Our teamwork

is inspired by bees and their collaborative and efficient model.

Project



EU Pollinator Hub - A Collaborative Hub for the Future of Pollinators.

B-THENET – Sustainable Beekeeping Practices.

PollinERA – Pollinator interactions to support EU Environmental Risk Assessment and policy.

Butterfly – Mainstreaming pollinator stewardship in view of cascading ecological, societal and economic impacts of pollinator decline.

BeSafeBeeHoney – Training & Networking.

Supporters



BeeLife counts with the support of important brands who help us keep doing the important work we do and expand our efforts to become more effective.

CONTACT

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