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PRESS RELEASE

A Call for Transparency on the Development of Guidelines for the Protection of Bees

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After years of discussion, EU Member States have still not adopted new guidelines for the protection of bees from pesticides. As a response to this situation, the European Food Safety Authority (EFSA) presented several alternative approaches to the Bee Guidance Document (concerning the risk assessment of effects from pesticides on bees), so to reach an agreement after seven years of discussion. One of the options that seem to be getting more political traction, however, leaves room for serious questions about the methodology used to set Specific Protection Goals (establishing the threshold of acceptance for the effects of pesticides on the environment and non-targeted species). The decision will have significant consequences on bees and biodiversity in the future. It will be a crucial element in whether the EU will be able to fulfil or not its commitment to a green transition and the overall protection of pollinators. Therefore, BeeLife European Beekeeping Coordination presents a series of questions to EFSA, the European Commission and member states regarding the methodology used to determine the proposed approaches.

After years of discussion and delays on the adoption of the EFSA 2013 Bee Guidance Document [1], negative consequences for the future protection of bees are becoming a real risk. Member states have not reached an agreement to adopt EFSA's groundbreaking work, which introduced state-of-the-art guidelines for the risk assessment of the effects that plant protection products have on bees. EFSA's work published in 2013 not only took into account the nocive effects from acute but also chronic (constant, with medium- and long-term) intoxications, as well as multiple ways of exposure [2]. Instead of counting with an efficient and scientifically sound procedure to ensure its commitment for the future of pollinators, the European Union is on the verge of

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maintaining a status quo that is harmful to bees or even worse, to establish untrustworthy methodologies.

EFSA presented four approaches:

- **Approach 1** – to establish an acceptable effect based on long-term colony survival
- **Approach 2** – to derive the threshold of acceptable effects on colony size based on their natural variability
- **Approach 3** – based on predefined acceptable levels on colony/population size.
- **Approach 4** – based on levels of acceptable impact on the provision of the ecosystem services.

From these approaches, the European Commission appears to show a preference for Approach 2. Nevertheless, BeeLife questions the efficacy of this approach to ensure the protection of bees. This approach avoids setting a maximum effect of pesticides on the colony strength. Instead, it establishes a level of variability in background mortality of the colony caused by the pesticides that would be acceptable. One of the main issues is that biology is variable; different factors influence it. In the case of honeybees, the climate strongly impacts them, as well as the amount of resources in their environment, beekeeping practices, etc. Approach 2 is, therefore, a theoretical exercise, which uses a mathematical model (Beehave) that is still not calibrated nor validated.

To help clarify the many issues surrounding the decision to come, we present authorities the following questions regarding the development of all approaches and the validity they might have:

1. What has been the methodology followed to achieve the proposal of the four approaches for the determination of SPGs on bees? (What is the scientific basis of the approaches, their origin, what was the selection criteria).
2. Why were these approaches not discussed with Stakeholders as the EFSA is doing for the development of the GD? Why are we members of the ad hoc group of stakeholders consulted for the methodologies within the GD and not for the setting of SPGs?
3. As BeeLife, we already evaluated the pertinence of the four approaches (please see our reaction in our press release [European Bees Under Peril as Protection Goals for the Risk Assessment of Bees Might Paint a Bleak Future](#) [3]). We find most of them either out of place

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or overly theoretical, detached from reality. Who are the bee experts that have been advising your work? What are the data supporting these approaches?

4. Beehave seems to be a stochastic (randomly determined) model that is used in approach 2 to artificially create variability. Has the colony variability from the model been calibrated or validated with field data? In our experience, colonies do not develop in real conditions in the same way as they do in the model, which leads us to question the validity of the model for the present purpose.

6. Given that context is critical to bee colony development, how well does the Beehave model represent different landscape contexts and resource provision?

7. Has the EFSA made the exercise to extrapolate what % of background variability of colony size equivalencies the current level of protection (negligible effect when $<7\%$ effects of the colony/population size)? As BeeLife we would like to have access to these simulations. We hold that this information should be available to member states before any decision is made on the approach to define SPGs.

8. Member states have taken seven years to decide whether or not to apply the EFSA 2013 methodology. Thanks to European research and EFSA's funding we have now three models underway, which will be available during 2021: honeybees (thanks to the project APISRAM), bumblebees and solitary bees (thanks to the project Poshbee). Why are the Member States, Commission and EFSA rushing to use the controversial model Beehave for the definition of SPGS that is going to be the basis of environmental protection from pesticides?

As well as a more general but elemental question, particularly directed to the European Commission and Member States:

9. Considering the decline of pollinators and the failure of EU policies to tackle it [4] [5], will there be a time when realistic and effective measures to protect pollinators will be taken with proper control and accountability measures, including penalties for not observing them?

Until we have these questions solved, we will not be able to determine whether approach 2 is a better approach than the current one. The future protection of bees will require reliable methodologies for risk assessment. We invite public authorities to answer these questions and to seriously reflect on the consequences of their preference for Approach 2, which seems to depend

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on a non-calibrated-not-validated model. We remain at their disposal to work together and ensure a plausible and advantageous outcome.

References:

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NOTE TO EDITORS:

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BeeLife European Beekeeping Coordination is an NGO initially formed by professionals of the beekeeping sector from different countries of the European Union. BeeLife works for the protection of pollinators in Europe, highlighting their value for nature and people. With over 20 members (beekeeping and farming associations) from 9 different European countries, BeeLife links policy, science and field observations to promote a more sustainable future for pollinators and their role in ecosystems.

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