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Response to Open Consultation

Brussels, 29 September 2025

Subject: Open Consultation on the legislative proposal on Uniform Principles

Contribution to the COMMISSION REGULATION (EU) amending Commission Regulation (EU) No 546/2011 as regards uniform principles for evaluation and authorisation of plant protection products with regard to birds, mammals, bees and drinking water

Available at https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14839-Plant-protection-products-uniform-principles-for-their-evaluation-and-authorisation_en

General considerations

The current proposal is framed entirely in terms of biological/ecological protection goals, not in terms of equity of production risks across stakeholders. Yet, there is a legitimate argument to integrate the latter concern because the Uniform Principles are meant to ensure a "*high level of protection of both human and animal health and the environment*" while safeguarding agriculture (Reg. 1107/2009, Art. 4).

Furthermore, we would like to share some considerations:

- There is an **asymmetry in protection goals:** The current draft tolerates up to a 10% loss of honey bee colony strength as an "acceptable risk." This translates into a direct **economic loss of productive capacity** for beekeepers (honey, pollination services, queen production), whereas pesticide use is meant to secure 100% of crop yield for farmers. Thus, risk acceptance is **unevenly distributed**: one group of producers (farmers) sees protection of their assets maximised, while another (beekeepers) is explicitly asked to absorb a systemic loss.

- **Pollination as an agricultural input**: Bees and other pollinators are not just environmental receptors; they are an **economic production factor** underpinning yields in fruits, oilseeds, and many vegetables. Equity in risk sharing requires that their productive capacity is afforded at least the same level of protection as crops. Otherwise, the regulation effectively subsidises one sector's production security at the expense of another's.

- **Consistency with One Health/ecosystem services**: The EU already frames pollinators as providers of ecosystem services essential to food security. A framework that allows for the routine loss of 10% of service providers without recourse undermines this approach. Equity considerations thus strengthen—not weaken—the science-based protection goal.

For these reasons, we would like to **propose to integrate the following new Recital:**

"Whereas pollinators, including honey bees, bumble bees and solitary bees, represent not only a vital ecological component but also a productive asset for beekeepers and farmers, and a key input to agricultural production through the provision of pollination services; whereas the authorisation of plant protection products should therefore ensure that protection goals do not lead to disproportionate transfers of production risk between farmers and beekeepers, by requiring one sector to tolerate systematic losses of productive capacity to safeguard the production of another; it is appropriate to integrate equity considerations in the uniform principles so that agricultural sectors sharing the same landscapes are protected in a balanced manner."

Furthermore, we also propose to complete the Annexe, under Point 2.5.2.3 – Bees

Additional paragraph (after the 10% colony size threshold):
"In applying this threshold, Member States shall take into account the role of bees as productive assets for beekeepers and as providers of essential pollination services to agriculture. The acceptance of colony-level impacts shall not result in systematic or disproportionate transfer of production losses from beekeepers to farmers. Where relevant, conditions of use or additional risk mitigation measures shall be applied to ensure equitable protection of productive assets across agricultural sectors."

Suggested insertions into Annexe points of Regulation (EU) 546/2011 (draft amendment)

Point 2.5.2.3 (Bees – protection goals):

> "For honey bees, the 10% colony-size reduction threshold shall apply to **cumulative seasonal exposure** across authorised uses within the relevant agro-climatic zone. The assessment shall explicitly consider stored provisions (pollen/bee bread, wax) and water sources as exposure matrices."

Add after paragraph on bumblebees/solitary bees:

> "For bumblebees and solitary bees, unacceptable effects include **sublethal impairments** to foraging, orientation, reproduction and offspring emergence,

assessed under laboratory, semi-field or field conditions aligned with species phenology."

Point 2.5.2.4 (NTAs):

"For non-target arthropods, laboratory effect thresholds shall be complemented by **community-level recovery criteria** and, where appropriate, species-sensitivity distributions to ensure the protection of functional groups essential for biological control."

General clause (new sub-point under Section 1.5.1):

"Member States shall evaluate, where available, **post-authorisation monitoring data** on bees (including colony performance and residue levels in bee matrices) and non-target arthropods (abundance and functional indices) and interpret such data in a consistent scientific way for maintaining, adapting or withdrawing authorisations."

New clause under 2.5.2.3/2.5.2.4 (Mitigation verification):

"Where authorisation relies on risk-mitigation measures, competent authorities shall require **post-use verification** during the first seasons of commercial use in representative regions to demonstrate that field outcomes meet the protection goals defined in points 2.5.2.3 and 2.5.2.4."

Scientific references

- EFSA (European Food Safety Authority). (2013). Guidance on the risk assessment of plant protection products on bees (Apis mellifera, Bombus spp. and solitary bees). *EFSA Journal, 11*(7), 3295. https://doi.org/10.2903/j.efsa.2013.3295

- EFSA (European Food Safety Authority), Adriaanse, P., Arce, A., Focks, A., Ingels, B., Jolli, D., Lambin, S., Rundlöf, M., Sußenbach, D., Del Aguila, M., Ercolano, V., Ferilli, F., Ippolito, A., Szentes, C., Neri, F. M., Padovani, L., Rortais, A., Wassenberg, J., & Auteri, D. (2023). Revised guidance on the risk assessment of plant protection products on bees (Apis mellifera, Bombus spp. and solitary bees). *EFSA Journal, 21*(5), 7989. https://doi.org/10.2903/j.efsa.2023.7989

- Henry, M., Béguin, M., Requier, F., Rollin, O., Odoux, J. F., Aupinel, P., Aptel, J., Tchamitchian, S., & Decourtye, A. (2012). A common pesticide decreases foraging success and survival in honey bees. *Science, 336*(6079), 348–350. https://doi.org/10.1126/science.1215039

- Whitehorn, P. R., O'Connor, S., Wäckers, F. L., & Goulson, D. (2012). Neonicotinoid pesticide reduces bumble bee colony growth and queen production. *Science, 336*(6079), 351–352. https://doi.org/10.1126/science.1215025

- Sandrock, C., Tanadini, M., Pettis, J. S., Biesmeijer, J. C., Potts, S. G., & Neumann, P. (2014). Sublethal neonicotinoid insecticide exposure reduces solitary bee reproductive success. *Agriculture, Ecosystems & Environment, 185*, 170–174. https://doi.org/10.1016/j.agee.2013.12.003

- EFSA (European Food Safety Authority). (2015). Statement on the state of the science on risk assessment of plant protection products for non-target arthropods. *EFSA Journal, 13*(2), 3996. https://doi.org/10.2903/j.efsa.2015.3996

- Sánchez-Bayo, F., & Goka, K. (2014). Pesticide residues and bees – A risk assessment. *PLoS ONE, 9*(4), e94482. https://doi.org/10.1371/journal.pone.0094482

- EFSA (European Food Safety Authority). (2017). Scientific opinion addressing the state of the science on risk assessment of plant protection products for in-soil organisms. *EFSA Journal, 15*(2), 4690. https://doi.org/10.2903/j.efsa.2017.4690

- EFSA (European Food Safety Authority). (2023). Guidance on the risk assessment for birds and mammals. *EFSA Journal, 21*(2), 7790. https://doi.org/10.2903/j.efsa.2023.7790

- Uphoff, A., Bielska, L., Putzu, C., & Papadaki, P. (2023). Guidance document on the impact of water treatment processes on residues of active substances or their metabolites in water abstracted for the production of drinking water. *EFSA Journal, 21*(8), 8194. https://doi.org/10.2903/j.efsa.2023.8194