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By email only

5 December 2016

Ban bee-harming pesticide substances

Dear Commissioner,

With this letter, we urge you to recommend the withdrawal of the EU market approval for four pesticide active substances: imidacloprid, clothianidin, fipronil and thiamethoxam. New information has emerged in the last couple of weeks, which makes this decision inevitable:

- For imidacloprid and clothianidin, the European Food Safety Authority (EFSA) has concluded that all authorised uses of these insecticides either pose a high risk to bees or that a high risk cannot be excluded.¹ These are the findings of EFSA reports issued in August 2015² and November 2016³, whereby the latter are based on 'confirmatory data' supplied by the producers themselves. Consequently, the EU must prohibit the use of these substances.
- For fipronil the producer (BASF) failed to submit supplementary information to support the renewal of the EU licence. The Commission has already decided to let the EU approval run out on 30 September 2017.⁴ For thiamethoxam, the producer (Syngenta) has failed to provide the 'confirmatory data' required to back up the existing EU approval. Both approvals must be ended at the earliest possible date.

¹ The only exception is use in permanent greenhouses. However, EFSA states that "at the Member State level, exposure via consumption of contaminated water ... should be further considered." (EFSA Peer review of the pesticide risk assessment for the active substance clothianidin in light of confirmatory data submitted, p. 9)

² EFSA Conclusions on the peer review of the pesticide risk assessment for bees for the active substances imidacloprid and clothianidin considering all uses other than seed treatments and granules, published on 26 August 2015

³ EFSA Peer reviews of the pesticide risk assessment for the active substances imidacloprid and clothianidin in light of confirmatory data submitted (considering uses as seed treatment or granules), published on 8 November 2016

⁴ Commission Implementing Regulation (EU) 2016/2035 of 21 November 2016

Worryingly, these four pesticide substances are not alone in posing a high risk to bees. Deltamethrin, cypermethrin and chlorpyrifos, to name but three, have also been shown to acutely affect bees at high concentrations, and to impact their health also as a result of chronic exposure and at sub-lethal low doses.⁵ Applications for the renewal of their EU licences are under review.

In addition to the withdrawal of the market approvals for imidacloprid, clothianidin, fipronil and thiamethoxam, we urge you to ensure that the 2013 EFSA Guidance on bee risk assessment is fully applied to any pesticide applications. The Guidance is the result of thorough scientific work and exemplary efforts by EFSA to work with stakeholders and independent experts to incorporate latest scientific knowledge. We warmly welcome EFSA's determination to apply this robust and up-to-date Guidance and regret that the European Commission has yet to convince Member States to embrace its use, more than three years after its publication.

If the risk assessment reveals a lack of data, the Commission must terminate the EU approvals of pesticides, rather than wait for companies to complete the dataset after the licences have been renewed. In the case of the four substances mentioned above, the additional information could not be 'considered to be confirmatory in nature' and to 'increase confidence in the decision', as required by Regulation 1107/2009. The European Ombudsman has recently criticised the Commission's overuse of the 'confirmatory data procedure' (CDP).⁶

Bees and other pollinators remain under threat in Europe. While no single factor can be blamed, the elimination of pesticides that pose a direct risk to pollinators is a crucial, achievable and effective step to protect their health.

Yours sincerely,



Jorgo Riss, Director,
Greenpeace European Unit



François Veillerette, President,
PAN Europe



Francesco Panella, President,
Bee Life

⁵ Greenpeace, 2013, [Bees in Decline](#)

⁶ Decision in case 12/2013/MDC on the practices of the European Commission regarding the authorisation and placing on the market of plant protection products (pesticides)