



President Jean-Claude Juncker  
European Commission  
Rue de la Loi  
1049 Brussels, Belgium  
Letter sent by e-mail only

Cc Commissioner Vytenis Andriukaitis  
Cc Commissioner Karmenu Vella  
Cc Secretary-General Martin Selmayr

22 January 2019

## Bees still exposed to dangerous pesticides, despite EU ban of three neonicotinoids

Dear Commission President,

In April 2018, we lauded the European Commission for banning all outdoor uses of three pesticides that were found to harm bees. Since then, Canada and Turkey have followed in the Commission's footsteps.

### Banned pesticides still in use

Unfortunately, the banned pesticides will still be used this year. Many EU countries, including Austria, Belgium, Denmark, Hungary, Poland, Romania and Slovakia, have issued so-called "emergency authorisations" to allow farmers to continue applying them. At least three EU countries, including France, Germany and the UK, have rejected such applications.

In our view, the Commission is not doing enough to discourage so-called "emergency authorisations" being granted as a routine response to EU bans, and outside "special circumstances", as required by EU pesticides law.<sup>1</sup>

In September 2017, DG SANTE asked the European Food Safety Authority (EFSA) to evaluate past "emergency authorisations" for neonicotinoids. In June 2018, EFSA declared most of them to be "scientifically supported", based on unsubstantiated claims by interested governments concerning the lack of non-chemical methods to tackle insect pests. Since then, the Commission has not taken any meaningful action even against those authorisations that EFSA considered "not scientifically supported".

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<sup>1</sup> Article 53 of Regulation (EC) No 1107/2009 allows Member States "in special circumstances" to "authorise, for a period not exceeding 120 days, the placing on the market of plant protection products, for limited and controlled use, where such a measure appears necessary because of a danger which cannot be contained by any other reasonable means".

The continued use of national “emergency authorisations” to circumvent the EU neonicotinoid ban undermines the EU’s efforts to protect bees. The Commission must ensure proper application of EU pesticides law.<sup>2</sup>

### **Other harmful pesticides still allowed**

We are also concerned that farmers can simply replace the banned neonicotinoids with other pesticides that are equally harmful to bees. This is because other pesticides are not tested to the same high standards. Until today, the EU has not consistently applied the most up-to-date scientific criteria for assessing pesticides’ impacts on bees, adopted by EFSA as early as 2013.<sup>3</sup> These testing standards have only been fully used in the evaluation of the three neonicotinoids that were subsequently banned, and partially in the assessment of very few other pesticides.

In June 2018, the Commission said it would ensure a staged implementation of these criteria by the end of 2018.<sup>4</sup> However, the latest implementation plan proposed by DG SANTE would mean that no other pesticide will be tested to the same high standards. In the coming years, the EU would do only a cursory evaluation of pesticides’ risks to bees. Potential effects of long-term exposure, for example, would not be assessed. Possible impacts on wild bees would be ignored altogether. The introduction of higher bee safety standards would be blocked for the next future.

Clearly, the fight to protect bees from harmful pesticides is not over.

**As President of the European Commission, we call on you to ensure EU countries apply the EU ban of three neonicotinoids, and that all bee-harming pesticides are similarly banned without further delay, in line with EU regulations.**

We stand ready to support the Commission’s efforts in this matter. Once again, several of our organisations are appearing in Court, on the same side as the Commission, to respond to the appeal brought by Bayer against the General Court’s ruling that upheld the EU’s initial restrictions of the three neonicotinoids in 2013.

Yours sincerely,



Magda Stoczkiewicz,  
Deputy Director, Greenpeace European Unit  
Also on behalf of:

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<sup>2</sup> Article 53(2) and (3) allow the Commission to consult EFSA and to take action so that Member States must withdraw or amend their measures.

<sup>3</sup> EFSA, 2013, Guidance Document on the risk assessment of plant protection products on bees (*Apis mellifera*, *Bombus* spp. and solitary bees)

<sup>4</sup> The EU Pollinators Initiative of 1 June 2018 says: “The Commission will adopt an implementation plan for the EFSA Guidance Document on the risk assessment of plant protection products on bees (*Apis mellifera*, *Bombus* spp. and solitary bees) in order to enhance the risk assessment of pesticides on pollinators”.

### *International organisations*

Avaaz

BeeLife - European Beekeeping Coordination

European Professional Beekeeping Association (EPBA)

Friends of the Earth Europe

International Federation of Beekeepers' Associations (APIMONDIA), WG on Adverse effects of Agrochemicals and Bee medicines on bees

Slow Food Europe

SumOfUs

Pesticide Action Network Europe

Women Engage for a Common Future (WECF)

### *National, regional and local organisations*

Apiculture Research Educational Center, Greece

Apiservices, France

Archevêché de Luxembourg

Asociación Española de Apicultores, Spain

Attac Luxembourg

Bee Garden, Spain

Bijenstichting, Netherlands

Bio-Lëtzebuerg Vereenegung fir Bio-Landwirtschaft, Luxembourg

Buglife, UK

BUND, Germany

ECOCITY, Greece

Ecological Council, Denmark

*Ecologistas en acción, Spain*

*Emweltberodung Lëtzebuerg (EBL), Luxembourg*

Earth Thrive, Serbia

*etika Luxembourg*

Europe and we, Bulgaria

Federation of Greek Beekeepers' Associations (OMSE). Greece

Federation of Irish Beekeepers' Associations (FIBKA), Ireland

Federation of Romanian Beekeepers' Associations (ROMAPIS), Romania

Federation SEPANSO, France

Friends of the Earth Cyprus

Friends of the Earth England Wales and Northern Ireland

Global 2000, Austria

Italian Foundation for Research in Organic and Biodynamic Agriculture (FIRAB), Italy

Latvian Fund for Nature, Latvia

Mellifera e. V., Germany

Mouvement écologique, Luxembourg

natur&ëmwelt, Luxembourg

Pesticide Action Network UK

Pestizid Aktions-Netzwerk, Germany

Pollinis, France

RedMontañas, Spain

SEO/Birdlife, Spain

Slovak Beekeepers Association, Slovakia

Slow Food Lëtzebuerg  
Som fir d'Erhalen an d' Entwécklung vun der Diversitéit (SEED), Luxembourg  
SOS Faim Luxembourg  
Syndicat national d'apiculture, France  
The Pollinators, Netherlands  
Umweltinstitut München, Germany  
Union Nationale de l'Apiculture Française (UNAF), France  
Veginfo Luxembourg  
Via Pontica Foundation, Bulgaria  
Vilde bier, Denmark  
Wild Bee, Switzerland