European Commission

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Dear Mr J. Riss, Mr F. Veillerette, Mr F. Panella,

Thank you for your letter of 5 December 2016 in which you express your concerns about the implementation of the new Guidance Document for the risk assessment for bees and the ongoing decision making regarding fipronil, clothianidin, imidacloprid and thiamethoxam. The topic was also discussed at a meeting on 19 December 2016 between Greenpeace and my deputy Head of Cabinet, and on 20 December between my services and Greenpeace, PAN and two other NGOs.

EFSA published the outcome of the assessment of the confirmatory data on clothianidin and imidacloprid on 8 November 2016. These conclusions are under evaluation by the Commission and the Member States. It is premature to predict an outcome of these discussions at this stage.

The previous expiry date of 30 September 2017 for fipronil was reinstated as the extended expiry date of 31 July 2018 was no longer needed to complete the renewal procedure given that no renewal dossier was submitted.

The data sent by the applicant for thiamethoxam was considered insufficient to fulfil the confirmatory data request for this substance. For this dossier as well, the Commission is currently discussing the next steps forward with the Member States.

Upon the Commission's request to review the risk assessment scheme for bees, EFSA published the "Guidance document on the risk assessment of plant protection products on bees" on 27 June 2013 in order to take into account the new scientific and technical knowledge.

Some Member States are strongly objecting to the bee guidance document, claiming that the approach used is too conservative and that this would result in an excessive loss of substances, whilst other Member States believe that the risk assessment scheme provided by the guidance document does not go far enough for the protection of bees.

Despite all the efforts made to find a compromise (including a workshop and the definition of a stepwise implementation plan discussed with Member States experts), Member States did not reach a consensus in the Standing Committee to adopt the guidance document (July 2014).

A stepwise implementation of this guidance document is now being considered, under the form of a Commission Notice. This is currently under discussion with the Member States.

We regret that in the present case the time between the adoption by EFSA of a guidance document and its endorsement by regulators is so long. There is a consensus amongst scientists that the science underlying the previous guidance document, which was applicable to the original applications for the three substances, is outdated. In particular the previous risk assessment scheme covered only acute mortality of adult bees from oral and contact exposure and the effects on bee brood. It did not cover risks from sub-lethal effects, from exposure to contaminated water and from seed treatment. As a consequence assessing the requested confirmatory information against this previous guidance document was not expected to lead to any meaningful conclusions.

For the benefits of environment, consumers and sustainable agriculture, the Commission is committed to addressing the current safety concerns for bees. To achieve this objective, it is necessary to implement the most recent scientific principles with regard to the risk assessment for bees.

Yours sincerely,