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## **ECPA view on Honeybee Health: *the need to work together***

ECPA welcomes the EC's communication on Honeybee Health<sup>1</sup> and the EP's resolution on the Situation of the beekeeping sector<sup>2</sup>.

### **Sustainable and productive farming: the need to work together**

ECPA would like to support the need for addressing the problem within a broader context, where Europe needs a competitive, productive and sustainable agriculture which is facing the challenges of feeding an increasing global population while preserving natural resources and enhancing biodiversity. In this context, ECPA acknowledges the important role played by honeybees along with other pollinators in pollinating a number of crops such as fruits, vegetables and nuts.

**A proper common understanding and working between growers, beekeepers, industry, public authorities and scientists should take place in order to determine the causes of the problem and bring effective solutions to it. It is in no-one's interest, including the Crop Protection industry, to ignore bee health issues.**

### **Honeybee health problems and research**

According to the scientific community and to the EC, the **European honeybee is considered a domesticated species, not a wild species**<sup>3</sup>. This is of paramount importance when analysing the current situation as it should be regarded as a livestock sector.

There is a consensus within the scientific community that the cause of honeybee colony losses in Europe is multi-factorial<sup>4</sup>. This view is supported by the EC Communication on Honeybee health which highlights that the colony losses cannot be attributed to any one single factor. As honeybee colonies are often exposed to a combination of stressors it is well justified to describe the honeybee problems as "multi-factorial". It is also important to note that colony losses do not occur simultaneously across all regions of Europe, but are often prevalent in specific regions only.

The list of factors which may affect honeybee health is long, and includes:

- **Parasites and diseases**: The parasitic mite *Varroa destructor* and a multitude of honeybee diseases (bacterial, fungal and viral) are caused by a variety of pathogens (such as *Nosema ceranae*).
- **Beekeeping and husbandry practices**: Such as following Good Apicultural Practise, proper use of bee medicines or supplementary nutrition to bees, are key factors for successful colony development.

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<sup>1</sup> COM (2010) 714

<sup>2</sup> B7-0622/2010

<sup>3</sup> [http://ec.europa.eu/food/animal/liveanimals/bees/index\\_en.htm](http://ec.europa.eu/food/animal/liveanimals/bees/index_en.htm)

<sup>4</sup> Scientific report submitted to EFSA Bee Mortality and Bee Surveillance in Europe, available at: <http://www.efsa.europa.eu/en/scdocs/doc/27e.pdf>

- Shortage of forage: Periods of flower scarcity, diversity of pollen and nectar, and the abundance or lack of foraging habitat within the landscape (e.g. field margins).
- Weather and climate change.

Crop protection practices is one factor to be considered, when these products are applied according to the label instructions, the risk of impact on honeybee health is minimised.

Currently there is no a precise quantification for all relevant influencing factors (either negative or positive) on honeybee colony survival or health, but it should be underlined that **PPP is the most regulated influencing factor on honeybee health**.

Further investigation and research on the causes of colony declines is on-going and our industry fully supports this research and is committed to finding out these causes.

**In this context, ECPA welcomes the proposal for an EU Reference Laboratory on honeybee health which will contribute to a better understanding of the current situation.**

### **Crop protection industry and Honeybee health**

While crop protection products (pesticides) are one of the factors quoted in this discussion, our industry is fully committed to providing necessary solutions through:

- **the safe and sustainable use of crop protection products by farmers;**
- **the promotion of good and sustainable farming practices (e.g. providing flower field margins) which enhance the habitat for bees;**
- **the investment in medicines to combat bee parasites, such as the Varroa mite.**

According to Regulation (EC) No 1107/2009, a crop protection product shall be approved only when it “...**has no unacceptable acute or chronic effects on colony survival and development, taking into account effects on honeybee larvae and honeybee behaviour**”. The crop protection industry is therefore committed to preventing risks to honeybees in the product development, registration and use phases through:

- appropriate environmental testing, which can include laboratory, semi field or field tests (acute toxicity tests, bee brood tests, residue tests, cage tests and tunnel tests, field trials, systemicity testing, and metabolite testing) and which provides a data set for risk assessment and which forms part of the product registration dossier;
- independent risk assessments which are carried out by independent regulatory authorities, based on the information which was collected in these tests and, in duly justified cases, further data or studies may be required to address complex and product-specific questions;
- and risk management enabling authorities if necessary, to manage or mitigate any risks of concern, through requiring specific measures. These measures could include preventing application during honeybee flight, requiring no application during crop flowering, limiting application rates, stipulating certain agronomic practices (e.g. requiring mulch flowering ground cover before application), or for seed treatment applications, stipulating seed coating quality and requiring certain application and dust monitoring practices.

Recent concerns have focussed on the use of certain seed treatments, which are PPP applications environmentally-friendly due to its minimised exposure. There remains no causal link between the use of certain seed treatments and general colony losses. The Crop Protection industry does however take the concern seriously and continues to work closely with regulatory authorities to ensure that the specific circumstances, which resulted in the incidents, will be avoided in future.

**According to the EC, so far no causal link between increased decline in honeybee population and specific substances or agents has been established.**

**The Regulation on placing crop protection products on the market and the Sustainable Use Directive provides a comprehensive regulatory framework for the authorisation and sustainable use of pesticides, including the establishment of monitoring systems by public authorities in MS.**