



Brussels, 25 January 2021

Commissioner S. Kyriakides
Vice-President F. Timmermans
European Commission
Rue de la Loi 200
1049 Brussels
Belgium

Concerns: request for ban of bee-toxic pesticides

Dear Commissioner Kyriakides,
Dear First Vice President Timmermans,

The European Commission is currently reviewing the approval of 3 important pesticide active substances, namely sulfoxaflor, cypermethrin and benfluralin. All 3 substances have received a negative opinion from the European Food Safety Authority (EFSA) and should therefore be withdrawn from the market as they do not fulfil the requirements laid down in the pesticide regulation 1107/2009/EC. These substances present major risks for human health and the environment, including for bees. In its European Green Deal, the European Commission has promised to improve the status of biodiversity by, among others, reducing pesticide use, in particular of the most toxic ones. Not banning such substances would be in total contradiction with the objectives of the Farm to Fork and the Biodiversity Strategies.

Sulfoxaflor is a new generation neonicotinoid, approved in the EU in 2015, under the condition that the holder of the approval provides additional data on the toxicity of its product to bees to the European Commission. The industry has provided the data in 2017 and the EFSA has published a negative opinion on the substance in February 2020. A high risk to honey bees and bumble bees has been identified in and at the margin of the fields, which means that outdoor uses of this substance cannot legally be approved. The EFSA had provided a similar opinion on 3 other neonicotinoids (imidacloprid, clothianidin and thiamethoxam), which led to a ban on outdoor uses in the EU in 2018. Sulfoxaflor must thus be banned as well.

Cypermethrin is a pyrethroid insecticide that has been on the European market since 2005. The EFSA has concluded that this substance presents a high risk to bees as well as to aquatic organisms and other arthropods. The EFSA also highlighted an incomplete risk assessment with regards to its endocrine disrupting properties and to the amount of residues that would

in the end be found in drinking water. Its toxicity to bees is indeed very close to that from the already banned neonicotinoids, it should thus be banned as well.

Benfluralin is a herbicide that is present on the EU market since 2008. For this substance, an impressive amount of data gaps prevented the EFSA to finalize its risk assessment, both for human health and the environment. This substance should thus be withdrawn from the market at once. In particular, data gaps were identified for assessing the toxicity of this compound to honey bees as well as for assessing the exposure of bees to this substance. Science has already shown that honey bees are not only susceptible to insecticides but also to fungicides and herbicides. This substance should thus be removed from the market.

The European Citizens Initiative *Save Bees and Farmers*¹ is composed of over 150 organisations² across the EU, mainly grassroots NGOs. We have already collected around 500 000 signatures from people who support a more environmental-friendly agriculture, the restoration of biodiversity, and greater support to farmers for transition to agroecology. Our organisations strongly support the European Commission's efforts to cut pesticide use and protect biodiversity.

We ask you today to make sure these 3 active substances will be withdrawn from the market as soon as possible, in coherence with the European legislation and in coherence with the objectives of the European Green Deal.

From beforehand, thank you for your answer.

Best regards,

Signatories: Aurelia Stiftung, BUND, European Professional Beekeepers Association, Friends of the Earth Europe, Générations Futures, Global 2000, Pesticide Action Network Europe, Slow Food EU and Umweltinstitute München, members of the Circle of Organisers of the *Save Bees and Farmers* European Citizens Initiative

Contact: info@savebeesandfarmers.eu

¹ www.savebeesandfarmers.eu

² <https://www.savebeesandfarmers.eu/eng/about-us/our-alliance/>