



Brussels, 20th May 2026

To: Commissioner Várhelyi, Commissioner Roswall
Cc. Commissioners Hansen
Cc. Flavio Facioni, Sandra Gallina, Almut Bitterhof

Dear Commissioner Roswall,
Dear Commissioner Várhelyi,

On the occasion of World Bee Day¹, we wish to draw your urgent attention to several matters that require immediate action if the European Union is to uphold its commitments to protecting pollinators. Indeed, one of the primary drivers of their decline being the continued authorisation and use of harmful pesticides; further action is needed.

Despite a comprehensive legal framework, bees and other pollinators remain gravely threatened by pesticide exposure, largely due to persistent procedural delays. The latter have hindered the effective implementation of the very safeguards designed to protect them. Two distinct but interrelated regulatory failures now require decisive intervention.

I. COMPLETING THE EXAMINATION PROCEDURE FOR THE REGULATIONS ON DATA REQUIREMENTS AND UNIFORM PRINCIPLES

The deficiencies of the current EU pesticide risk assessment scheme for bees, adopted in 2002, have been formally acknowledged for over a decade. This scheme is demonstrably unfit for purpose: it omits key toxicological tests, disregards critical routes of exposure, and focuses exclusively on honey bees, leaving other insect pollinating species entirely unprotected.

In 2012, EFSA acknowledged the shortcomings of the 2002 risk assessment scheme for bees and, one year later, published a new Bee Guidance Document intended to address them. Unfortunately, this Guidance was never endorsed. Following a mandate from the Commission in

¹ World Bee Day was established by the UN General Assembly to raise awareness of the essential role of bees and other pollinators in sustaining both human health and ecosystems.

2019, EFSA revised the document and published an updated version in 2023. Yet its formal adoption at the EU level is still pending.

To state the matter plainly: no less than 14 years have now passed since EFSA first acknowledged that the current risk assessment was not fit for purpose, and three years have elapsed since the publication of the revised Bee Guidance Document. During this entire period, the EU has continued to operate without a harmonised and scientifically adequate framework for assessing the risk pesticides pose to bees. Such a delay constitutes not merely a scientific and regulatory failure, but a breach of the obligations imposed by Regulation (EC) No 1107/2009.

We therefore respectfully urge the Commission, as a matter of overriding public interest, to ensure, without further delay, the completion of the examination procedure for the draft Commission Regulations amending:

- Regulation (EU) No 283/2013 (data requirements for active substances);
- Regulation (EU) No 284/2013 (data requirements for plant protection products); and
- Regulation (EU) No 546/2011 (uniform principles for evaluation and authorisation of plant protection products).

We note with concern that the examination procedure, initially scheduled for 2025 SCoPAFF sessions, is constantly postponed. We would be grateful if you could **submit these agenda items to the vote of Member States at Scopaff in the next meeting**. The Bee Guidance Document should then be implemented without delay to ensure improved protection for bees.

II. THREE SUBSTANCES REQUIRING URGENT REGULATORY ACTION

The absence of an updated risk assessment framework has directly enabled the authorisation - and continued use - of pesticides whose harmful effects on bees and other pollinators are well documented. We draw your attention to three such substances.

1. Flupyradifurone

The scientific literature on flupyradifurone's toxic effects on bees has grown substantially. At least 72 peer-reviewed studies on its effects on non-target organisms are now available, of which 44 specifically concern bees. The overwhelming majority of these studies document toxic effects, particularly on wild species, frequently at environmentally realistic exposure concentrations.

In 2022, EFSA itself could not exclude serious risks to wild bees². Yet rather than triggering precautionary restrictions, this finding was followed, in July 2025, by a 3.5-year extension of flupyradifurone's EU approval, bringing it to June 2029.

² <https://efsa.onlinelibrary.wiley.com/doi/full/10.2903/j.efsa.2022.7030>

We further note the Commission's acknowledgement, in the SCoPAFF Summary Report of 10-11 March 2026, that the lack of appropriate guidance documents and risk assessment schemes prevented adequate evaluation of flupyradifurone's effects on bees other than honey bees at the time of both approval and renewal. The Commission additionally stated that risks to solitary bees and bumblebees could be assessed under the 2023 Bee Guidance Document once the proposed amendments to the data requirements and uniform principles are adopted.

However, EFSA is already empowered to apply its 2023 Bee Guidance Document without awaiting the finalisation of the Guidance adoption - precisely as it did when applying the 2012 Scientific Opinion to assess the risks of thiamethoxam, clothianidin and imidacloprid, as confirmed by the Court of Justice of the EU in case C-499/18P. There is no legal obstacle to proceeding on the same basis for flupyradifurone.

Therefore, given the weight of the available evidence and the technical timeline for finalising the examination procedure of the amended data requirements and uniform principles, **we urge the Commission to issue, without further delay, a formal Article 21 mandate to EFSA to reassess the risks of flupyradifurone on bees, on the basis of the 2023 Bee Guidance Document.**

2. Acetamiprid

The scientific evidence on acetamiprid is equally compelling. This neonicotinoid insecticide is persistent in the environment and toxic to humans, birds and bees. We are also concerned about a significant inconsistency in the regulatory record: the biocide dossier for acetamiprid characterises it as '*very persistent in the environment*', while the pesticide dossier, relying on different data, concludes that it is non-persistent. This discrepancy warrants urgent scrutiny and clarification.

We acknowledge that the Commission has initiated a review under Article 21 of Regulation (EC) No 1107/2009, focusing on the developmental neurotoxicity (DNT) and endocrine disrupting (ED) properties of acetamiprid, and that a mandate to this effect was issued to EFSA in May 2025. We welcome this step.

However, this review does not encompass the substance's effects on bees and other non-target arthropods. **We therefore respectfully urge the Commission to issue a dedicated mandate to EFSA requiring an assessment of these effects, based on the 2023 Bee Guidance Document, in particular with respect to wild bees.**

More broadly, we call on the Commission to ensure that the mobilisation of Article 21 reviews is conducted in a genuinely timely manner.

3. Cypermethrin

Cypermethrin presents a well-documented and serious risk profile: it exhibits hormone-disrupting properties, is acutely toxic to bees and other non-target arthropods, and is highly toxic to aquatic and soil organisms. EFSA has concluded that, under conditions of continued use, a reduction to safe levels is not achievable given the insufficiency of available spray drift mitigation measures.

Notwithstanding these critical areas of concern, Commission Implementing Regulation (EU) 2021/2049 of 24 November 2021 renewed the approval of cypermethrin without adequately addressing EFSA's findings.

Following this reapproval, PAN Europe submitted a request for internal review of that Regulation. After the Commission's decision of 23 June 2022 (ref. Ares(2022)4621502) dismissing that request, PAN brought legal proceedings before the General Court and subsequently the Court of Justice of the European Union (EUCJ). In December 2025, the EUCJ issued a judgment annulling the Commission's decision of 23 June 2022.

We respectfully request that you immediately implement the Court ruling in order to respect the rule of law and protect our bees and our health.

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To conclude, we would like to stress that World Bee Day offers an important opportunity to reaffirm the European Union's commitment to biodiversity protection and to the precautionary principles underpinning EU law. It would, however, be profoundly contradictory for the Union to commemorate this occasion while (1) critical tools to assess the risk of pesticides on bees remain stalled, (2) substances with well-documented toxic effects on pollinators continue to benefit from extended approvals, and (3) a Court judgment on pesticide governance awaits implementation.

We would like to further underline that both acetamiprid and flupyradifurone demonstrate that the European Commission does not make sufficient use of its prerogative to trigger Article 21 procedures to review the approval of substances, in light of the significant new scientific knowledge on their toxicity. Therefore, we would like to once again express our firm opposition to the Food and Feed Omnibus regulation proposal of providing open-ended approval periods for pesticide substances. Indeed, as illustrated by these 2 substances, the proposed system of selected reviews based on new scientific evidence is not currently working. Expanding it to more substances will inevitably lead to less protection of people's health and the environment.

We therefore urge the Commission to treat the matters set out in this letter with the urgency they require. We remain at your disposal to provide any further technical information that may be of assistance.

We thank you for the attention to these important matters and remain at your disposal for any further discussion.

Yours sincerely,

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