Executive Director

EUROPEAN FOOD SAFETY AUTHORITY

Ref. BU/GdS/MT/mc-OC-2023-29060820

Mr Hans Muilerman

Pesticide Action Network Europe
Rue de la Pacification 67
1000 Brussels
Belgium
hans@pan-europe.info

Subject: Negative effects on biodiversity not taken into account

Ref.: your letter dated 07 March 2023

Dear Mr Muilerman,

Thank you for your observations regarding the assessment of biodiversity via indirect effects and trophic interactions, and for bringing to our attention the recent scientific publications referenced in your letters.

EFSA fully shares the urgency to undertake further actions to strengthen risk assessment methods of PPPs under Regulation (EU) 1107/2009. For this reason, several initiatives have been undertaken in past years, for example the EFSA methods for the definition of Specific Protection Goals (SPGs)[1] based on ecosystem services and biodiversity. This approach has already been positively considered by EU Member States (MSs) and stakeholders within the action[2] initiated in 2019 by the European Commission to agree on SPGs, in view of the revision of the Terrestrial Ecotoxicology guidance document. The same methods have been applied to support risk managers on the definition of SPGs for bees[3] in the context of the soon to be published revision of the EFSA bee guidance.

As explained in previous exchanges of letters, assessing biodiversity impact is complex and requires an integrated consideration of the relevant factors at landscape level. At EFSA, we believe that a suitable approach for addressing the impact of indirect effects can be considered as part of the definition of SPGs for non-target arthropods and non-target terrestrial plants. The definition of SPGs based on the EFSA methods will allow risk managers to collegially set the desired level of protection for the relevant non-target organisms by taking into account ecosystem services and biodiversity, and the agreed SPGs will be implemented in the risk assessment through the development of fit-for-purpose risk assessment methods.

You may know that EFSA has initiated some preparatory work in this regard, including data collection to support the definition of SPGs for non-target arthropods[4]. This project is part of a wider EFSA plan to advance the environmental risk assessment of PPPs, for which EFSA funded in 2021 the development of a roadmap for building a European partnership for next generation systems-based environmental risk

[1] Scientific Opinion on the development of specific protection goal options for environmental risk assessment of pesticides, in particular in relation to the revision of the Guidance Documents on Aquatic and Terrestrial Ecotoxicology (SANCO/3268/2001 and SANCO/10329/2002) https://www.efsa.europa.eu/en/efsajournal/pub/1821, and Guidance to develop specific protection goals options for environmental risk assessment at EFSA, in relation to biodiversity and ecosystem services. https://www.efsa.europa.eu/en/efsajournal/pub/4499

[2] Specific Protection Goals for the Environmental risk assessment of PPP - setting the basis" that took place with experts from Members States (21 June 2019) and with stakeholders (25 September 2019); Specific Protection Goals for the Environmental risk assessment of PPP – moving on with the EFSA method (3 - 4 February 2020)

[3] https://food.ec.europa.eu/plants/pesticides/protection-bees_en#specific-protection-goals

[4] https://etendering.ted.europa.eu/cft/cft-display.html?cftId=8625

assessment (PERA[5,6]). Indeed, the experience gained with the EFSA bee guidance will be reused and expanded in the context of PERA, and EFSA intends to organise several opportunities for interaction with stakeholders in order to collect continuous feedback to inform the work ahead, for example public consultations and stakeholder meetings.

I trust that the above addresses your questions.

Yours sincerely,

Digitally signed
by: Bernhard Url
Date: 2023.05.02
09:10:25 +01'00'

Bernhard Url

[5] https://www.efsa.europa.eu/en/supporting/pub/e200503
[6] Services - 48237-2023 - TED Tenders Electronic Daily (europa.eu)