



Environment, Plants & Ecotoxicology Unit

Parma, 17 May 2023

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Mr Hans Muilerman
Pesticide Action Network Europe
Rue de la Pacification 67
1000 Brussels
Belgium



Subject: Negative effects on biodiversity not taken into account

Ref.: your letter dated 09 May 2023

Dear Mr Muilerman,

EFSA Executive Director office delegated to me the reply to your letter dated 09 May 2023, in my role as Environment, Plants & Ecotoxicology Head of Unit at EFSA.

Thank you for your reply to our letter of May 2nd 2023 and the opportunity to provide further explanations.

Let me stress again that EFSA fully shares the vision about the urgency to undertake further actions to strengthen risk assessment methods of PPPs within the Regulation (EU) 1107/2009.

Several aspects must be considered for a proper assessment of biodiversity within the prospective risk assessment. For example, it is necessary to:

- Select a representative number of non-target vulnerable species to be used as model species for risk assessment;
- Identify the measurement endpoints (e.g., focus on species richness and/or on population density, occupancy of vulnerable populations) and identify the normal operating range of those vulnerable model species;
- Describe the reference agronomic conditions and select realistic worst-case environmental landscape scenarios;
- Identify species which are predominantly vulnerable to indirect effects due to decline in food and habitat availability caused by treatment-related direct toxic effects;
- Explore to which extent the establishment of ecological compensation areas reduce the risks on landscape-level biodiversity.

As mentioned in our previous letter, the inclusion of these aspects and in general, considerations for biodiversity assessment can be operationalised with the scientific process underling the definition of Specific Protection Goals (SPGs), as recommended by EFSA Scientific Committee (2016).

Once SPG are decided by risk managers, they can be implemented in the risk assessment. In current guidance documents, procedures for biodiversity assessment are not (yet) explicitly described. An opportunity for terrestrial prospective environmental risk assessment (ERA) is that guidance documents are developed for different terrestrial organism groups, adopting a coherent strategy in selecting SPGs and developing ERA decision schemes.

EFSA has already undertaken actions to advance the ERA of PPP towards a system-based approach. A roadmap has been published in 2022¹, and for its implementation a multiannual programme has been developed to address several needs. Within this programme, a significant amount of resources will be invested in the next few years. For instance, a project is already ongoing on non-target arthropods² and a high value call is opened to develop EU scenarios³. Other calls will be launched soon.

Considering the complexity of the topic, we think that a structured and systematic approach is warranted and interim solutions (e.g. the proposal mentioned in your letter) may not be fully appropriate. It is our plan to advance the work on ERA with a structured and collective approach, for which the support of stakeholders will be sought to collect ideas and input in the shaping of new risk assessment methodologies. We look forward to your contributions to this process.

I trust that the above addresses your additional concerns.

Best regards

Tobin Robinson
Head of Unit

¹ <https://www.efsa.europa.eu/en/supporting/pub/e200503>

² <https://etendering.ted.europa.eu/cft/cft-display.html?cftId=8625>

³ [Services - 48237-2023 - TED Tenders Electronic Daily \(europa.eu\)](#)