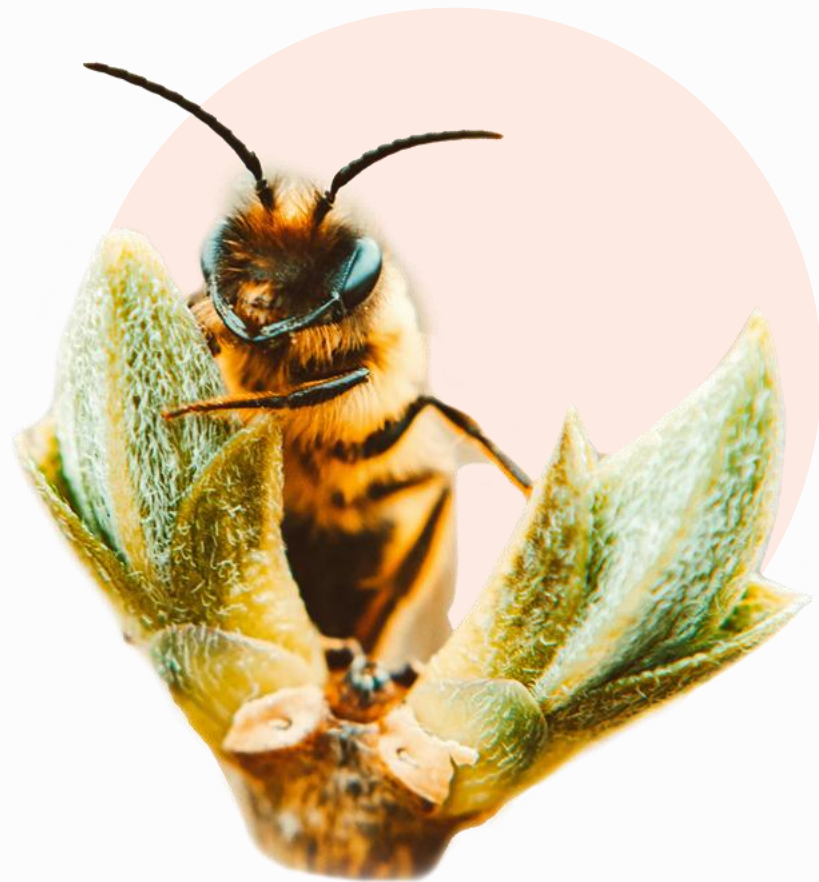


Bee Guidance Document Saga: 12 (17) years later, still not implemented.

*EP, Brussels
15/07/2025*



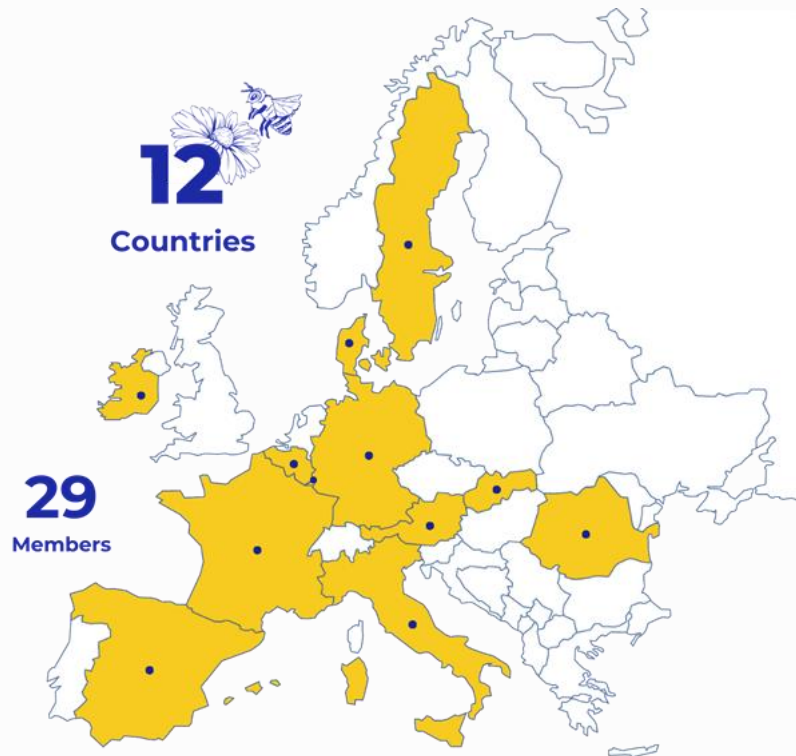
MEMBERS

Meet our members

We represent associations and cooperatives of beekeepers and farmers across **12 EU countries**.

BeeLife represents a leading body for the sector within the EU landscape with about **44.5%** of the members, **34%** of the colonies and **56%** of the total honey production.

Our members are our most valuable asset, they are our eyes in the field, providing firsthand insight and grounding our work in real-world challenges and experiences.



Legal framework

Regulation (EC) No. 1107/2009

Legal requirement for Risk Assessment on bees (HB and others)

Regulations (EC) No. 283/2013, 284/2013 and 546/2011

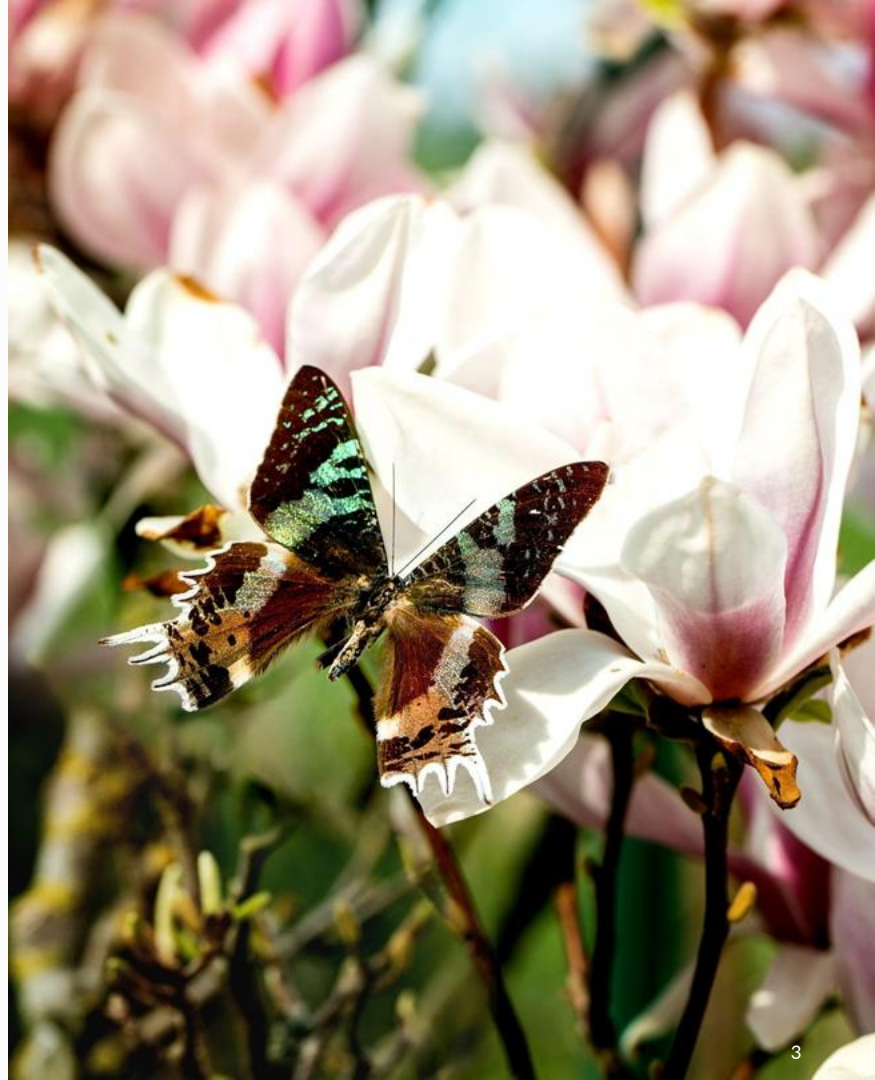
Data requirements and uniform principles

Acute, chronic toxicity

Adults and larvae.

Effects on development, behaviour and exposure through several ways

Nectar, pollen, guttation/water, dust, honeydew, etc.



Until 2013

Beekeepers

'90s-2000 - Drastic Colony Losses

Scientific research on chronic and sublethal effects of neonicotinoids and analytical methodologies starts.

2008-09 - Beekeepers get organised

Creation of the Task Force European Beekeeping Coordination
Participation to working groups where Pesticide Risk Assessment methodology is established (ICPPR).

2010 - 2 Milestones

- Methodology not adapted to scientific knowledge.
- Conflict of Interest.

Environmental Risk Assessment
for Honeybees
State of play and Future Proposals



2011 - EFSA starts working

EFSA Bee Expert group is formed.

EFSA

2012 - 1st EFSA Milestone

- Confirmation -
Methodology not adapted to scientific knowledge.



2013 - 2nd EFSA Milestone



- Acute & chronic toxicity.
- Risk to **larvae, bumblebees, and solitary bees**.
- Multiple exposure route
- **Never officially adopted** -
opposition from a majority of MSs

2013 - Today

Decision makers

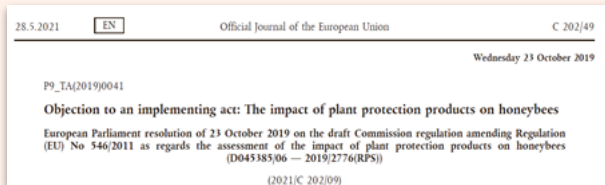
2013 - 2019 - Member States block full implementation

Commission proposes a **watered-down amendment** to the Uniform Principles in 2019 (Omission of CHRONIC TOXICITY and LARVAL TOXICITY).

2019 - EP Resolution vetoes proposal

1107/2009 legally requires chronic toxicity to be considered.

EFSA's 2013 guidance reflects current scientific and technical knowledge.
Called for full implementation, not partial revision.



2018 and 2022 - Neonicotinoides and sulfoxaflor

Assessed with 2013 methodology
Unacceptable risks identified
Limit use to greenhouses

2026 - Update of Uniform Principles?

EFSA

2021 - EFSA reviews 2013 guidelines

EFSA Bee Expert group is formed

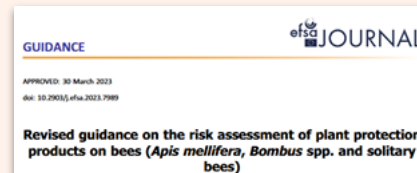
2022 - EFSA Reviews the SPGs

No political consensus on Uniform Principles



2023 - 3rd EFSA Milestone

- SPGs agreed
- Acute & chronic toxicity, sublethal
- Risk to **larvae, BB** and **SB**.
- Multiple exposure route (models)



Lessons learned

- **Important role to society of field practitioners like beekeepers**, who, with the support and collaboration of scientists and NGOs, put in motion a shift in the consideration of environmental health.
- Basis of decision making in science **takes too long when science/field is inconvenient (17 years)**.
- The **system is not adapted to accept the unexpected**. Messengers of an imperfect system often get mistreated.
- **Main problem:** pesticide authorisation and use are legally separated.
- **In silo consideration of chemicals:** pesticides, biocides, veterinary products, pharmaceuticals, etc.
- Future - **Systems-approach for chemical authorisation and use**.





REGULATORY CONTEXT

Status Quo

Regulation (EC) No. 1107/2009 being discussed with a strong push from certain MS for more active substances (AS) availability, no withdrawal of AS without alternatives, encourage emergency authorisations when no alternatives are available, etc.

Key word: simplification...

Next process: Update of Methodology of RA for NTAs, non-target Plants, indirect effects.... - Will risk managers follow Science?

Team



Our teamwork
is inspired by bees and their
collaborative and efficient model.

Project



EU Pollinator Hub - A Collaborative Hub for the Future of Pollinators.

B-THENET – Sustainable Beekeeping Practices.

PollinERA – Pollinator interactions to support EU Environmental Risk Assessment and policy.

Butterfly – Mainstreaming pollinator stewardship in view of cascading ecological, societal and economic impacts of pollinator decline.

BeSafeBeeHoney – Training & Networking.

Supporters



BeeLife counts with the support of important brands who help us keep doing the important work we do and expand our efforts to become more effective.

CONTACT

Thank you for your attention!

Noa Simon Delso: simon@bee-life.eu

Min-Jin Courier: info@bee-life.eu

Communications team: comms@bee-life.eu
ramponi@bee-life.eu



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