



AGA

To: the Members of the Standing Committee for Food Chain and Animal Health



21 November 2006



Dear Sir/Madam:



We would like to raise your attention to the undergoing evaluation of the insecticide fipronil within the framework of Directive 91/414/EEC on the placing of plant protection products in the EU market. In our opinion, the risk evaluation of this active substance fails to take into consideration the risk that fipronil poses to bees. Please find enclosed a succinct note setting out a beekeepers point of view about the fipronil's assessment report.



We therefore urge you not to miss the opportunity to ban this dangerous substance from the EU market. Any market or economic considerations should not gain importance over the protection of the environment and preservation of bees which are fundamental components of our agriculture.



Friends of the Earth Europe



Our concerns on the toxicity of fipronil are based on certain elements of the Draft Assessment Report (DRA) carried out by the European Food Safety Authority and on the conclusions of the Peer Review on the risk evaluation. They can be summarised as follows:



- **Fipronil shows acute toxicity against bees:** It shows its acute toxicity: the DL50 (lethal dose 50) that is measured in µg per bees, in the case of this substance is of the order of nanograms per bees.



- **Fipronil is neurotoxic:** this insecticide has the power of blocking some mechanisms of neurotransmission in the adult insect or in the larva. In very small doses (of about one part per billion -ppb) this compound is able, without killing the insect, to cause behavioural disturbances (e.g. orientation errors) that could be deadly for the colony, whose survival relies on the integrity of the ability of its members 1 [1].

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- **Fipronil is systemic:** Systemic treatments, which aim to address the entire plant, are liable to contaminate all its parts, including the flower. It is proven today2[2] that fipronil is present in the nectar and the pollen of plants coming from treated seeds. This substance is therefore found in the food of bees and their brood.



- **Fipronil is persistent in the environment:** The worrying persistence of fipronil as well as of some of its metabolites is a matter for concern. This is somehow expected since the stability of the compound is necessary for the systemic action supposed to last for the entire growing period of the plant (i.e. several months). As the pesticides are widely used on a large number of crops and may be used on wheat as well as on beetroot, oilseed rapes or sunflower, for several consecutive years and in a systematic rotation, we believe it is necessary to study the behaviour of the substance in the soil after several years of treatment, and the possible contamination of untreated flower crops that have been grown in a soil being treated for several consecutive years.





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In addition, the DRA and the conclusions of the Peer Review are in our opinion problematic, because the DRA states that the measurement of the Hazard Quotient is not relevant for bees as regards seed treatment. If the experts value necessary the replacement of this index by a more accurate one, it is the European institutions that should be in charge of revising the annexes of Directive 91/414 in this sense. Until such revision has not taken place the dispositions of the annexes apply.

We therefore ask you that no active substance carrying high toxicity for bees (HQ>50) be included in Annex 1 of Directive 91/414, until independent and validated tests show the innocuousness of such substance for bees, their broods, and their entire colony taken as a system.

We would also like to remind you the importance of bees for the ecosystem and the agricultural economy (e.g. in 2000 the total contribution of bees to the US GDP has been estimated equivalent to 15 billion of dollars (source: INRA)).

Thank you very much for your time and consideration.

Yours sincerely,

For the organizations:

- Associazione Apicoltori Professionisti Italiani
- Asociación Galega de Apicultura
- Deutscher Beruf und Erwerbs Imkerbund
- European Professional Beekeepers association
- Fédération apicole belge – Belgische Bijenteelfederatie v.w.z
- Friends of the Earth Europe
- Koninklijke Vlaamse Imkerbond
- Lëtzebuurger Landesverband fir Bielenzucht
- Mitteldeutsche Imkerunion EV
- Mouvement pour le droit et le respect des générations futures
- Natagora
- Nature et Progrès Belgique
- Pesticide Action Network Europe
- Syndicat national d'apiculture
- Umweltbund
- Unione Nazionale Associazioni Apicoltori Italiani
- Union nationale de l'apiculture française
- Fédérations belges d'environnement BBL – BRAL – IEB – IEW,

Contact and coordination: Inter-Environnement Wallonie, 6 Boulevard du Nord – 5000 Namur (Belgium)

1 See for example Colin *et al.*, 2004 : *A method to quantify and analyse the foraging activity of honey bees : relevance to the sublethal effects induced by systemic insecticides*, Arch. Environn. Contamin. Toxicol. 47, 387 – 395 ; also Suchail S., Guez D. and Blezunces L.P., 1999 : *Acute and chronic toxicity of Imidacloprid and its metabolites in Apis mellifera*, 7th Bee protection symposium, Hazards of pesticides to bees, 7 – 9 September 1999.

2 See for example Chauzat *et al.*, 2006: *A survey of pesticides residues in pollen loads collected by honey bees in France*, J. Econ. Entomol. 99 (2): 253 - 262 ; Rortais et alii, 2005 : *Modes of honeybees exposure to systemic insecticides : estimated amounts of contaminated pollen and nectar consumed by different categories of bees*, Apidologie 36 (2205), 71 – 83.