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Monday 10 May 2021

**Open letter** concerning: your involvement in the protection of bees against pesticides

Dear Ministers,

The European Commission has fixed, as an objective of the European Green Deal, to restore biodiversity and to reduce the use and risk of pesticides by 50% by 2030. Indeed, for the first time, the European Commission has acknowledged that pesticides are a major driver of the decline of biodiversity. Pollinators and in particular bees (honeybees but also bumblebees and solitary bees) which provide essential ecosystem services, are declining in Europe with some species already extinct.

Unfortunately, and despite the fact that most politicians claim they want to protect bees and nature, facts show us that many EU Member States and the European Commission keep supporting the ecocide generated by pesticides, thus going against the European Green Deal. In a letter dated 2 April 2021<sup>1</sup>, EU Commissioner S. Kyriakides informed us that too many Member States oppose the ban on outdoor uses of 3 bee-harming pesticides, namely sulfoxaflor, benfluralin and cypermethrin.

The European Food Safety Authority (EFSA) has identified high risks to bees for sulfoxaflor and cypermethrin, while for benfluralin, the risks could not even be determined because of the numerous data gaps in the application dossier. Therefore, these 3 substances do not fulfil the approval criteria for active substances according to Article 4 of the EU Pesticide Regulation (EC) No 1107/2009.

Furthermore, it appears that in the frame of the ongoing discussions on the Bee Guidance Document, a majority of Member States would accept a high impact of pesticides on bees. While in 2013, risk managers from EU countries had agreed a maximum threshold of a 7% of the workers of a honey bee colony would die from exposure to pesticides, it seems that now a

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<sup>1</sup> <https://www.savebeesandfarmers.eu/eng/materials/videos/answear-of-the-commission-on-open-letter.pdf>

majority of the Member States is promoting at least the double, with some Member States promoting up to 25% of the reduction of a honey bee colony when exposed to a pesticide. This would violate the principle of the EU-pesticide regulation that pesticides may only be authorised if they do not have an unacceptable impact on the environment. It is thus unacceptable!

All these discussions are taking place behind closed doors in the Standing Committee on Plant, Animal, Food and Feed and your position is never made official, which is in our view a deficit of democracy. We consider the evolution of the situation to be a scandal: first, a majority of Member States refuse to support the adoption of the Bee Guidance Document from 2013. Second, despite the EFSA highlighting that the risk posed by pesticides to bees is excessive, most Member States refuse to ban the substances. This attitude contributes to the ecocide humanity is facing and, as European citizens, we are ashamed of this undemocratic process!

**As supporters of the European Citizens' Initiative *Save Bees and Farmers*<sup>2</sup>, we demand you to make sure that Ireland will support a ban on outdoor uses of sulfoxaflor, cypermethrin and benfluralin at once. We also ask you to support a maximum reduction in honey bee colony size of maximum 5%. Indeed, scientists have shown that it was feasible to identify a reduction in colony size of up to 5%<sup>3</sup>.**

**We here kindly ask you to inform us what the position of Ireland is concerning the approval/non-approval/ban of sulfoxaflor, benfluralin and cypermethrin. We also kindly ask you what percentage of reduction in colony size Ireland supported in the meeting of 24/25 March of the Standing Committee on Plant, Animal, Food and Feed and what will be Ireland's position for the agriculture and fisheries council meeting of 28-29 June where the level of protection of honey bees will be discussed.**

From beforehand, thank you for your consideration.

Best regards,

An Taisce

Bat Conservation Ireland

CELT

Friends of the Irish Environment

The Organic Centre

VOICE

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<sup>2</sup> [www.savebeesandfarmers.eu](http://www.savebeesandfarmers.eu)

<sup>3</sup> Osterman J, Wintermantel D, Locke B, Jonsson O, Semberg E, Onorati P, Forsgren E, Rosenkranz P, Rahbek Pedersen T, Bommarco R, Smith HG, Rundlöf M, de Miranda J, 2019. Clothianidin seed-treatment has no detectable negative impact on honeybee colonies and their pathogens. *Nature Communications* 10: 692.

About the *Save Bees and Farmers* campaign: The European Citizens Initiative (ECI) *Save Bees and Farmers* gathers over 200 organisations throughout the EU. An ECI is a tool of participatory democracy in the EU that aims at collecting over 1 million validated signatures throughout the Union in order to trigger a political and democratic discussion in the European Commission and the European Parliament around the demands of the citizens. Our demands are 1. To phase out the use of synthetic pesticides by 2035, 2. To restore biodiversity in agricultural areas and 3. To support farmers in the transition towards agroecology. Our campaign has collected up to now around 600 000 signatures and will run until 30 September 2021.