



**Bee health conference**

**Brussels, 18.04.2014**

To: Paola Testori Coggi  
Director General, DG SanCo  
European Commission  
B-1049 Brussels.



Concerning : current state of pollinators and future challenges in the European Union

Dear Director General, Dear Madam Testori Coggi,

We are very grateful for the organisation by the European Commission of the Bee Health conference on April 7<sup>th</sup> 2014 and thank you for participating to this event, thus showing how important the topic of pollinators is.

Some statements of your conclusion speech have called our attention and we would like to communicate to you the following elements.

As the European Union Reference Laboratory (EURL) on bee health has exposed, nearly half the colonies in Europe have overwintered in 2013 with less than 10% mortality, which is considered to be an acceptable natural winter mortality in Europe, even though still not ideal. In your speech you quoted the figure of 95% of the honey bee colonies (in the 17 countries monitored) have overwintered properly during the winter 2012-2013.

We would like to underline that the figures provided by the EURL also indicate that one third of the monitored European colonies underwent a mortality rate higher than the 10% baseline. Furthermore, the countries with the highest mortality rates (UK, BE, DK, FI, SE) are, strangely, the countries where the prevalence of pathogens is minimal for American Foulbrood, varroosis (except UK) and noseiosis (except UK and SE). However, pesticides as a cause were not inside the scope of this study. We would like to have your view on this obvious gap. We would like to stress that in future monitoring studies, it is of major importance that all drivers of bee health (pathogens, pesticides, food resources and climate) are duly assessed.

As expected, seasonal mortality is low nearly all over Europe, except for France (13.6%), which is one of the most important users of pesticides in Europe. On average, 5.7% of the visited colonies presented clinical signs of American Foulbrood but this alone cannot explain why France has such an important abnormal seasonal mortality rate. Lack of environmental relevant data will, once again, not permit to discard the “pesticides hypothesis”.

You said in your speech that these figures are not alarmist. It is true that it is, on average, better than what was expected. However, it is important to point out that these figures should be analysed over several years as mortalities are highly variable, from one year to another. Moreover, these figures only concern managed pollinators. In his speech, François Wakenhut (DG Environment), mentioned that the first results of the STEP project on wild pollinators are highly worrying (24% of the 68 European bumblebee species are in phase of extinction).

For this reason, your conclusion seemed misinformed. Even more, your suggestion that the temporary ban on neonicotinoids based on these “not so negative” figures could be reviewed seems to us highly premature and not at all defensible when considering the evidence presented at the conference.

As you mentioned, more science and knowledge are needed. We strongly encourage you to not give up the good work DG SanCo has performed up to now, by applying the precautionary principle, based on independent scientific conclusions from EFSA. We also strongly urge you to collaborate with DG Environment and DG Agriculture in order to include all drivers of the loss of biodiversity including pesticides.

Best regards,

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