



Beekeepers together EPBA & BEELIFE

Comments and proposals on
the evaluation of the sustainable use of pesticides
Directive 2009/128/EC and impact assessment of
its possible revision

25 June 2021 SUD Stakeholder online Meeting
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The voices of beekeepers and bees

A European coverage



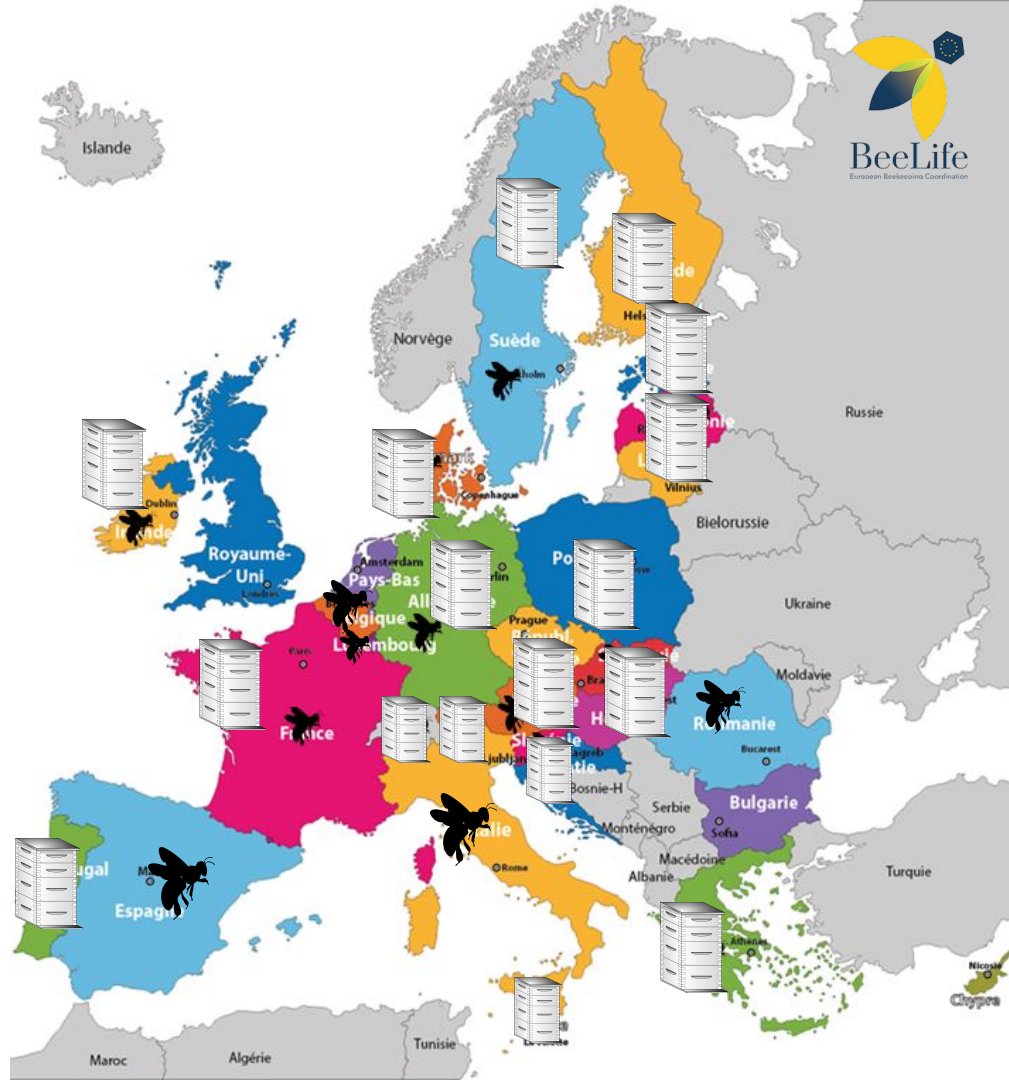
EPBA: professional organisation of beekeepers



BeeLife: environmental NGO created by beekeepers

Different ways but a common goal: a healthier agro-environment for bees and pollinators

2 contributions but thousands of beekeepers





Policy options for the SUD

- Binding targets are necessary
- Need to consider the starting point of each MS, e.g. Austria is a “good student” in the case of organic farming
- OUR PROPOSAL: These are converted to **binding targets to be achieved at EU and MS levels** but shall take into consideration the different national situations and starting-points of MS.
- **IMPORTANCE OF LANGUAGE:** Replace the “burden-sharing” concept by the “benefit-sharing” one.

Feedback on some of the proposals (1/5)



COM proposal for “need to consider in the impact assessment potential costs and benefits”

- **Consider society and environment**, e.g. reduce contamination of foodstuffs/water, increase animal and public health, increase ecosystem services (i.e. nutrient recycle, pest control, etc.)
- **Beekeepers and pollinators as one of the major target for the evaluation of impact**, next to “pesticide users” and “wider society and environment”.
- “Bee” farmers must be considered as **an economic interest group** (EPBA status), providers of public goods (= positive externalities), e.g. pollination, food, pharmaceuticals, technical products, inspiration, cultural heritage, etc.



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Feedback on some of the proposals (2/5)



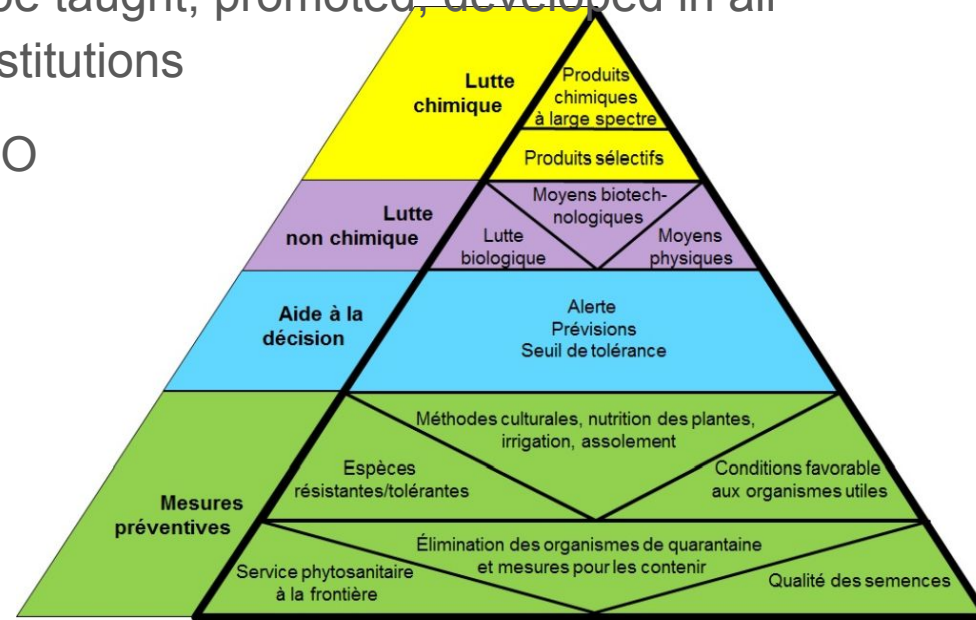
COM PROPOSAL FOR IPM: new techniques and precision farming

COM PROPOSAL	Beekeepers Associations views
<ul style="list-style-type: none">- Specific record-keeping by professional pesticide users as a tool to monitor and enforce IPM implementation	<ul style="list-style-type: none">- Registration and COMMUNICATION TO AUTHORITIES of pest pressure monitoring and decision making criteria
<ul style="list-style-type: none">- Clarifications to current IPM principles to specify for example potential roles of new technologies and precision farming	<ul style="list-style-type: none">- New technologies and precision farming to provide automatic recording and communication- New technologies based on modified genetic techniques - Attention to contamination of beekeeping products with GM material

Feedback on some of the proposals (3/5)

Training and advisory services:

- Require detailed training for advisors: Yes, BUT train on a PARADIGM CHANGE. IPM and agroecology to be taught, promoted, developed in all Agricultural Schools and advisory institutions
- Mutual recognition of certificates - NO unless there is a standard frame/programme and exam
- FULL SUPPORT for independent advisory services



Aerial spraying, drones (4/5)



COM Proposal	EPBA	BeeLife
<p>Amend definition of aerial spraying to confirm (again) that aerial spraying can be via any airborne device including drones, not just planes and helicopters</p>	<p>Ok for in principle as drones are a step in the right direction towards targeted pesticides application but maintaining the ban principle for aerial spraying (planes and helicopters)</p>	<p>Before agreeing, prove that drones help reducing the risk and use of pesticides. See Japanese case of human intoxications from drone-treated-crops.</p>
<p>Within certain parameters, to be defined in a future legislative Annex, no derogation would be required for aerial spraying by drones if demonstrated to reduce overall use and risk</p>	<p>Asking for permit/autorisation of spraying Any spraying, if required, needs to be done in absence of pollinators (at sunset) for all modes of actions. An intermediated step. Max.precision through robots/rover</p>	<p>Drone (any aerial) spraying, if required, needs to be done in absence of pollinators (at sunset) for all pesticide modes of action (not just insecticides).</p>
<p>Allow spraying (including aerial spraying) without prohibition and without derogation if the spraying instrument is less than 2 metres from the crop being sprayed, other parameters concerning use and risk would need to be studied and established</p>	<p>We do not agree. First is this really well tested in practice, for instance under windy conditions, as a benefit to reduce spread of particles into the air and environment outside the targeted crop field? How this (ie: 2m) can be controlled?</p>	<p>Never!!</p>

Feedback on some of the proposals (5/5)



- **Health and environmental monitoring, data, indicators:**

Pollinators and bees = key indicators

Pollinator index currently in triologue negotiations on CAP and strategic plans, even though it is not clear whether it would be linked to the use of PPP.

Pollinator index as an impact indicator, proposed by the European Parliament, put on hold from the Commission and Council. Could start from 2023. How to make it feasible?

- **Restriction on PPP use:**

The term of **sensitive areas should be broadened** to include more areas than just urban green areas. Endocrine disruptors and genotoxics may have an impact on human and non-targeted species also in rural areas.

- **National Action Plans**

Full support for NAPs to be required within the CAP National Strategic Plans. Support the Commission to develop more detailed guidance and templates **in cooperation with relevant stakeholders. Indicators must be binding!**



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Coherence among policies - a real IPM Eco-scheme?




CAP

Commission proposed an Integrated Pest Management (IPM) Eco-scheme, including:

- mechanical weed control; MAY BE EFFICIENT
- Increased use of resilient, pest-resistant crop varieties and species; - EFFICIENT (no NBTs)
- buffer strips, with management practices without pesticides; - PROBLEMATIC
- Land lying fallow with species composition for biodiversity purpose - PROBLEMATIC

Buffer strips, land laying fallows, catch crops and cover crops with plants for biodiversity purpose favour the exposure of pollinators to pesticides due to drift from treated fields, where pollinators forage.

What about a real IPM Eco-scheme?

Agricultural practice	Example of payment per year if practices supported are...	
	alternative criteria	cumulative criteria
<p>Keeping a treatment register compiling results of pest monitoring, monitoring methods (e. g. pictures, trapping, etc.) and decision criteria for establishing treatment need</p> 		
<p>1 Seed/soil treatments reduced by 95% in 3 years, in comparison with first year of engagement (33% reduction/year)</p> <p>Spray treatments reduced by 50% in 3 years, in comparison with first year of engagement (17% reduction/year)</p>	50€/Ha	1 + 2 + 3
<p>2 If pesticide needs to be used, favour non persistent one</p> 	50€/Ha	are applied =
<p>3 Pesticide application after sundown</p> 	50€/Ha	150€/Ha

Payment amount given as an example

More info:

<https://www.bee-life.eu/post/proposals-for-an-efficient-integrated-pest-management-eco-scheme-in-the-next-cap>

KEY POINT MESSAGES

Coherence in policy WITH AN HOLISTIC VIEW: Bee guidance document, F2F & Biodiversity Strategies, CAP, Water Directive...

A real implementation is needed for this 12 YEARS OLD Directive

One health: from nature and fields, to our bees and beehives, to your spoon !



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Thanks for your attention!




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