

22.12.2017

## EU Initiative für Bestäuber

Am 1. Dezember veröffentlichte die Europäische Kommission eine "Roadmap" für eine europäische Initiative für Bestäuber. Bis zum 29. Dezember sind Kommentare zu dem Erstentwurf der Initiative erwünscht. Als Aurelia Stiftung haben wir dazu Stellung bezogen. Wir begrüßen diese Initiative und sind für einen Dialogprozess zur Mitgestaltung der Inhalte bereit. Um den Dialog mit allen Beteiligten voranzubringen, haben wir folgende Stellungnahme für die Europäische Kommission erarbeitet und senden diese ebenfalls an die Bundesregierung.

Zugänglich ist die "EU Pollinators Initiative" unter folgendem Link:

[https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2017-5895634\\_en#initiative-details](https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2017-5895634_en#initiative-details)



Thomas Radetzki  
Vorstand



Johann Lütke Schwienhorst  
Agrarreferent

## Statement on the EU Pollinators Initiative

The Aurelia foundation appreciates that the European Commission aims to tackle the problems about the decline of pollinators. Protection and facilitation of pollinators have to become an interdepartmental, crosssectoral task, which for the European Commission has to provide the fundament.

### Importance of the CAP for Pollinators

The roadmap determines the context and the problem the initiative aims to tackle very well. The description of „what does the initiative aim to achieve and how“ and its three focusses, is no more than a tentative and deficient attempt to achieve improvements. The CAP, as a key for an agriculture that could promote pollinators, is not even mentioned. All three focusses have to be thought in the context of the CAP-reform 2020. Beneficial measures for pollinators will only succeed with a working implementation, which could be realized through the CAP.

### Extension of the research focus on bee bread (relating to I)

The focus of „improving the knowledge of pollinators, including by supporting“ needs to be extended on pollen and bee bread. The mentioned interlinkages should refer to the effects of mixtures of pesticides. These combined effects of several different active substances are widely unknown. There is a high demand of applied research and by now a neglect of the precautionary principle. Those results have to be implicated into the process of approval for active substances.

### Strengthen the second focus on pesticides (relating to II)

In the second focus the essential topic of pesticides gets touched just marginally. Extractable residues in honey give an impression of existing threats by pesticides, pollinators are faced to.



The implementation of the applicable law concerning pesticides has deficits, which get revealed by the reviewed facts about glyphosate residues in honey.

### **Development of a glyphosate exit scenario**

Glyphosate destroys habitats of pollinators and the scientific threats and risks of this active substance are not clarified in a valid way. The initiative needs to push forward the development of an exit scenario for glyphosate. In January 2017 the Aurelia foundation published the results of honey analysis tested on glyphosate residues. The exceedance of the limit value could be detected up to 200 times. Most samples have been closed to the limit value. The German bee monitoring ("Deutsches Bienen Monitoring") investigated a considerable database on pesticide residues within the last 12 years. The result of the 98 taken samples in 2016 detected 7% of the samples with glyphosate residues. 2% weren't marketable. The general burden are 96% of 203 samples which contain residues of active substances. Furthermore, conspicuous in this report is the increase of multiple pesticide residues. 34% of the taken 203 taken pollen samples, contained more than 10 active substances. Including pollen samples taken from cities, this database appears even trivializing with regard to the reality of agricultural used land.

### **Following the polluters pay principle**

Responsibilities about the risk and the upcoming costs for honey that loses its marketability are not clarified at all. Thus the beekeepers carry the risk and the costs for the analysis and the damages alone, which is not acceptable. An implementation of the polluters pay principle needs to be an essential requirement in this focus. This would not just protect the marketability of honey, it would protect all pollinators from the misuse of pesticides.

### **Relevance of neonicotinoids**

Also in the second focus the relevance of neonicotinoids needs to be clarified. The effects of neonicotinoids on pollinators are clearly determined. An initiative on pollinators has to pursue an unlimited ban of neonicotinoids.

### **Improving collaboration on all levels in the third focus (relating to III)**

The Aurelia foundation explicitly welcomes the aim of supporting local, regional and national pollinator strategies. Therefore the "nationaler Bienenaktionsplan" of our foundation offers a substantiated base. The purpose of improving the collaboration is commendable. Until now there exist obvious deficits in the approval procedure for active substances. This focus needs to clearly appoint a redevelopment of the approval procedure, which guarantees transparency and independent science, under consideration of all stakeholders, including NGOs.

We are looking forward to receive differentiated answers on our feedback, which we consider to be the beginning of a constructive dialogue process, with a continuous exchange about the content of the EU pollinators initiative.

For more information, see our latest publications:

Bericht - Deutsches Bienenmonitoring: [https://bienenmonitoring.uni-hohenheim.de/fileadmin/einrichtungen/bienenmonitoring/Dokumente/Schlussbericht\\_DeBiMo\\_2014-2016.pdf](https://bienenmonitoring.uni-hohenheim.de/fileadmin/einrichtungen/bienenmonitoring/Dokumente/Schlussbericht_DeBiMo_2014-2016.pdf)

Nationaler Bienenaktionsplan: [https://www.aurelia-stiftung.de/downloads/Factsheet\\_Bienenaktionsplan.pdf](https://www.aurelia-stiftung.de/downloads/Factsheet_Bienenaktionsplan.pdf)