



Commissioner Stella Kyriakides  
European Commission  
Rue de la Loi 200  
1049 Brussels  
Belgium

**Concerns:** Germany's disregard of the approval regulation for Acetamiprid

Berlin, February 11<sup>th</sup> 2021

Dear Commissioner Kyriakides,

As representatives of beekeepers and advocates for biodiversity, we are deeply concerned about the national authorization to use insecticides containing the active substance Acetamiprid in blossoming crops in Germany. Contrary to the EU approval regulation, which clearly says „Member States shall pay particular attention to the risk to aquatic organisms, bees and other non-target arthropods“<sup>1</sup>, German authorities classify Acetamiprid products as „B4 = not harmful to bees“ (e.g., Mospilan SG<sup>2</sup> or Danjiri<sup>3</sup>).

With the “B4” classification, Acetamiprid chemicals can be applied on rapeseed blossoms even during the daytime when bees are flying and feeding on the blossoms. In fact, this remains standard procedure in the German rapeseed cultivation. The German Federal Office of Consumer Protection and Food Safety (BVL) also approves of advertisements that promote the use of Acetamiprid products in the blossoming stage of rapeseed<sup>4</sup> and that it is safe for beneficial insects<sup>5</sup>. Although we brought this to the attention of the authorities, they recently extended the approval for these products<sup>6</sup>.

In addition to the environmental risks regarding bees, wild pollinators and other non-target organisms, German beekeepers are facing major economic problems due to the risk of exceeding the maximum residue limit of Acetamiprid in honey. This risk has become even higher since Acetamiprid is currently the only approved Neonicotinoid and the most recommended insecticide that may be used in the blossoming stage of rapeseed in Germany

<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1520336385887&uri=CELEX:32018R0113> (Annex I)

<sup>2</sup> <https://apps2.bvl.bund.de/psm/jsp/DatenBlatt.jsp?kennr=005655-00>

<sup>3</sup> <https://apps2.bvl.bund.de/psm/jsp/DatenBlatt.jsp?kennr=005655-60>

<sup>4</sup> [https://www.myagrar.de/pub/media/MyAGRAR/documents/64526-00/Gebrauchsanweisung\\_Mospilan\\_2018-2-26.pdf](https://www.myagrar.de/pub/media/MyAGRAR/documents/64526-00/Gebrauchsanweisung_Mospilan_2018-2-26.pdf) (Page 4)

<sup>5</sup> <https://www.fmccagro.de/de/produkte/a-z/mospilan-sg-im-raps.htm>

<sup>6</sup>

[https://www.bvl.bund.de/DE/Arbeitsbereiche/04\\_Pflanzenschutzmittel/01\\_Aufgaben/02\\_ZulassungPSM/01\\_ZugelPSM/04\\_Verlaengerungen/psm\\_ZugelPSM\\_Verlaengerungen\\_node.html](https://www.bvl.bund.de/DE/Arbeitsbereiche/04_Pflanzenschutzmittel/01_Aufgaben/02_ZulassungPSM/01_ZugelPSM/04_Verlaengerungen/psm_ZugelPSM_Verlaengerungen_node.html)



this year (2021). In almost all German regions it is not possible to avoid conventional rape cultivation within the flying range of honeybees. Thus, practically all rapeseed honey is contaminated.

Contrary to what was approved for Thiacloprid by the EU in 2016 following a request from Germany<sup>7</sup>, increasing the maximum residue level for Acetamiprid must not be an option. Sublethal effects on pollinating insects occur even at the concentration of the current maximum residue level. Human toxicological concerns, which led to the ban of Thiacloprid, also apply to Acetamiprid<sup>8</sup>. In order to protect biodiversity, bees and beekeepers, Germany urgently needs to classify Acetamiprid products as harming for bees, thus prohibiting the application in blossoming crops.

We urge you to please ensure an implementation of the Acetamiprid approval regulation in Germany that strictly follows the EU approval regulation for Acetamiprid to „pay particular attention to the risk to bees and non-target arthropods“.

We look forward to your reply.

Kind regards

---

Thomas Radetzki  
Chairman Aurelia Foundation

---

Annette Seehaus-Arnold  
President German Professional Beekeepers  
Association (DBIB)

---

<sup>7</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R1355>

<sup>8</sup> <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2013.3471>