European Economic and Social Committee

OPINION

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European Citizens Initiative – Save bees and farmers

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(Own initiative opinion)

NAT/868

Rapporteur: **Arnold PUECH d'ALISSAC**

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Outcome of vote (for/against/abstentions)	160/0/2

1. Conclusions and recommendations

1.1 The success of this European Citizens' Initiative (ECI) illustrates the high expectations that European citizens have of the European Commission. The EESC would first like to congratulate the organiser and acknowledge the commitment of citizens towards this achievement, given the difficulty in collecting all the signatures needed. It therefore calls on the Commission to provide precise and specific answers to the requests made by this ECI.

1.2 The EESC regrets that the main proposal of the ECI, consisting of a total phase-out of synthetic pesticides by 2035, is not highlighted in the title chosen: "Save the bees and the farmers". Moreover, the EESC points out that many legislative acts are being prepared or have already been adopted by the Commission in favour of bees, pollinators, biodiversity, the sustainable use of pesticides, and support for farmers in the agro-ecological transition. It recognises, however, that these measures have not fully achieved their objectives. It therefore calls on the Commission to take additional measures to achieve its ambitious objectives more effectively in practice. For example, it recommends stronger support for precision agriculture, digital agriculture, biological control, and robotics, as well as agro-ecology.

1.3 The EESC stresses the need to take into account all three pillars of sustainability (environmental, social and economic), without neglecting the economic situation, which is often overlooked, in an essential context of systemic sustainability and food sovereignty.

1.4 The EESC also calls on the Commission to carry out impact assessments before taking any decision, in order to assess, in particular, the costs of the initiative for agricultural production and the economy, compared to the financial cost of biodiversity loss for farmers.

2. Background

2.1 An ECI for an agriculture that is more respectful of bees, people and the environment

2.1.1 The ECI scheme offers European citizens the opportunity to participate actively in the democratic processes of the European Union (EU) by asking the European Commission to propose new legislation. Once an initiative receives the support of at least one million EU citizens and reaches the required thresholds in at least one quarter of the Member States[1], the Commission must respond to the ECI.

2.1.2 The "Save bees and farmers! Towards a bee-friendly agriculture for a healthy environment" ECI, having reached these thresholds, therefore calls on the Commission to propose legislative acts to phase out synthetic pesticides by 2035, restore biodiversity, and support farmers through this transition phase.

1 Regulation (EU) 2019/788.

2.2 **A background of pollinator decline and biodiversity erosion in Europe**

2.2.1 The requests made under this ECI come in a context in which Europe is facing a decline in bees. Indeed, according to the European Red List of Bees, one in three bee and butterfly species is in decline, with one in ten being threatened with extinction[2].

2.2.2 However, 84% of European crops benefit, at least partially, from animal pollination[3] and 78% of wild plants in the EU depend on pollinating insects[4]. Protecting them is therefore a crucial issue for agricultural production, in the vital context of food security and food sovereignty we are currently facing. In addition, bees are vital for the production of honey, while the European Union is only 60% self-sufficient in terms of honey. To meet demand, it has to rely on imports (28% of which come from China), which are of lower quality than European honey.

2.2.3 According to the Assessment Report on Pollinators, Pollination and Food Production of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)[5], the main drivers of pollinator decline are changes in land use, intensive agricultural practices and pesticide use, environmental pollution, invasive alien species, pathogens and climate change.

2.2.4 A diversified food resource (nectar and pollen) which is available in sufficient quantities throughout the year is also a key factor for the proper development of bees and for ensuring more regular honey production for beekeepers[6].

2.2.5 The decline in bees is part of a broader context of biodiversity erosion. Indeed, the Global Assessment Report on Biodiversity and Ecosystem Services, drawn up by IPBES[7] in 2019, described an unprecedented erosion of biodiversity.

2.2.6 Following these IPBES reports, the French Research Institute for Agriculture, Food and the Environment (INRAE) and the French Research Institute on Marine Exploitation (Ifremer) published, in May 2022, a collective scientific appraisal (ESCo) on the impacts of plant protection products on biodiversity and ecosystem services[8]. The ESCo highlights the multifactorial nature of biodiversity decline, as well as the difficulty in determining to what extent plant protection products (PPPs) are responsible for this decline due to the interdependence of different factors. On the other hand, thanks to scientific knowledge, the

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2 Nieto et al., 2014. European Red List of Bees.

3 Williams, 1994. The dependence of crop production within the European Union on pollination by honeybees.

4 Ollerton et al., 2011. How many flowering plants are pollinated by animals?

5 IPBES, 2016. Assessment Report on Pollinators, Pollination and Food Production.

6 French Technical and Scientific Institute for Bees and Pollination (ITSAP), 2015. Ressources alimentaires pour les abeilles (Food resources for bees).

7 IPBES, 2019. Global Assessment Report on Biodiversity and Ecosystem Services.

8 INRAE and Ifremer, 2022. Impacts des produits phytopharmaceutiques sur la biodiversité et les services écosystémiques (Impacts of plant protection products on biodiversity and ecosystem services).

ESCo was able to establish a clear causal link between the use of PPPs and the decline of certain populations, including pollinating insects.

2.3 **Many legal acts are being prepared or have already been adopted by the Commission in support of bees, the sustainable use of pesticides, the restoration of biodiversity, and support for farmers in the agro-ecological transition**

2.3.1 Concerning the protection of bees and pollinators: in 2018, the EU launched the EU Pollinators Initiative, which aims to tackle the decline of wild pollinators in the EU. The initiative comprises 10 actions, split between three priority headings:

- improving knowledge of pollinator decline, its causes and its consequences;
- tackling the causes of pollinator decline;
- raising awareness, engaging society-at-large, and promoting collaboration.

Nevertheless, in its Special Report 15/2020 on the protection of wild pollinators in the EU[9], the European Court of Auditors found that "this had little effect on halting the decline and that the initiative needed better management to achieve its objectives". In its report on the implementation of the initiative[10], the Commission also acknowledged that, while significant progress has been made in implementing the initiative's actions, efforts were still needed to address the various causes of decline.

2.3.2 Concerning the reduction of the impact and risks of plant protection products: the Commission launched the revision of its Directive on the sustainable use of pesticides, in order to address the major issue of the Directive's limited effectiveness in reducing their use as well as the risks to human health and the environment, by presenting a new draft Regulation in June 2022[11]. Some of the main developments include:

- legally binding targets at EU level to reduce, by 50%, the use and risk of chemical pesticides and the use of the most hazardous pesticides by 2030;
- new measures to ensure that farmers implement integrated pest management;
- the prohibition, where no derogation has been granted, of all pesticides in sensitive areas.

2.3.3 The marketing of PPPs in the EU is strictly regulated. The legal framework for placing PPPs on the market in the EU is established by Regulation 1107/2009[12]. According to this Regulation, risk assessments must be carried out prior to the approval of an active substance at European level, in order to avoid potential adverse effects on health or the environment. In addition, the guidelines on the assessment of the risks of plant protection products for bees (Bee Guidance

9 European Court of Auditors. Special report 15/2020.

10 COM(2021) 261 final

11 COM(2022) 305 final .

12 Regulation (EC) No 1107/2009.

Document[13]) are currently being revised in order to take into account the latest scientific developments in this area.

2.3.4 Concerning the restoration of biodiversity in agricultural areas: although it does not only concern agricultural areas, the EU can draw on the Natura 2000 network and the Birds[14] and Habitats[15] Directives, which form the basis of EU nature conservation legislation. The Commission has also implemented the EU biodiversity strategy for 2030[16]. This strategy includes actions and commitments aimed at restoring biodiversity in agricultural areas, as set out in the draft Nature Restoration Regulation[17], presented by the Commission on 22 June 2022. In particular, Article 8 of the project would enshrine the binding target for the Member States to reverse the decline of pollinator populations by 2030, and Article 9 would include commitments to restore agricultural ecosystems, for example ensuring that at least 10% of EU agricultural areas is under "high diversity landscape features" by 2030.

2.3.5 Concerning support for farmers in the transition: the new CAP 2023-2027 is a key tool for achieving the ambitious objectives of the European Green Deal and for supporting farmers. A special report by the Court of Auditors from 2020 showed that the contribution of the current CAP had failed to halt the decline in biodiversity on agricultural land[18]. The Court of Auditors concluded that the Commission's tracking of biodiversity-related expenditure was unreliable, that the impact of CAP direct payments was limited or unknown, and that the Commission and the Member States had promoted rural development measures that had a rather low impact. The new CAP provides for new measures to improve its environmental impact, such as improved conditionality.

2.3.6 EU texts and work in sectors other than agriculture may also have an indirect positive effect on pollinators, for example, the "Fit for 55" legislative package with regard to the EU's objective of reducing carbon emissions by 55% by 2030 (given that bees are also affected by climate change), the Zero Pollution Action Plan aimed at eliminating air, water and soil pollution, the Renewable Energy Directive and even the New EU Forest Strategy through the Commission's goal of planting three billion trees across Europe by 2030.

3. General comments

3.1 The EESC stresses the importance of ECIs as a tool for the direct participation of European citizens. ECIs are in fact the most powerful participatory democracy tool available at European level. Acting as a bridge between civil society organisations and the European institutions, the EESC has strengthened over the years the importance given to ECIs and has increased their visibility in the daily work of the institutions. It welcomes the fact that this opinion is the first to

13 EFSA, 2022. Revised guidance on the risk assessment of plant protection products on bees (Apis mellifera, Bombus spp. and solitary bees).

14 Directive 2009/147/EC.

15 Directive 92/43/EEC.

16 COM(2020) 380 final.

17 COM(2022) 304 final .

18 European Court of Auditors. Special report 13/2020.

be adopted on the basis of an ECI, before the response of the European Commission, whom it calls on to respond to the requests made in a precise manner.

3.2 The EESC regrets that the main proposal of the ECI, consisting of a total phase-out of synthetic pesticides by 2035, is not highlighted in the title chosen: "Save the bees and the farmers".. It points out that many legal acts are being prepared or have already been adopted by the Commission in an attempt to address these requests, but recognises that these measures have not fully achieved their objectives. It therefore calls on the Commission to take additional measures to achieve its objectives in practice and in a swifter manner. However, the EESC stresses the need to take into account all three pillars of sustainability (environmental, social and economic), in an essential context of systemic sustainability and food sovereignty, and to carry out impact assessments before taking any decision, particularly in order to assess the costs of the initiative for agricultural production and the economy.

4. Specific comments

4.1 On the ECI's call to "phase out synthetic pesticides in EU agriculture by 80% by 2030, starting with the most hazardous, to become free of synthetic pesticides by 2035":

4.1.1 the EESC warns against setting idealistic or unachievable objectives within overly tight deadlines. It stresses that the Commission is already proposing to reduce the use and risk of chemical pesticides and the use of the most hazardous pesticides by 50% by 2030. More generally, the Committee is against the setting of reduction targets for pesticides without any link to the availability of effective and accessible alternatives for farmers.

4.1.2 The EESC stresses that the regulatory framework for PPPs in Europe is among the most demanding in the world in terms of objectives, as it codifies, as a principle, the absence of unacceptable effects on the environment.

4.1.3 In the EESC's view, as the decline of honey bees and wild pollinators has multifactorial causes, ending the use of pesticides should not be seen as the sole or main lever for saving them. It is essential to tackle all factors behind the decline. For example, in the case of honey bees, tackling varroa mites and the Asian hornet is a major concern for professional beekeepers, who are hoping for new treatment solutions to better protect their bees.

4.1.4 The EESC notes the importance of honey bees, wild pollinators and other insects for agriculture (crop pollination, natural pest regulation, etc.). It cites the example of win-win partnerships between farmers and beekeepers such as the "Adopt a hive" schemes[19] launched by farmers. Indeed, farmers who adopt beehives pay particular attention to the protection of bees when carrying out phytosanitary treatments to protect their crops. ApiAlert-type devices[20] should also be developed, making it possible to count the mortality of beehives and to determine the actual causes of this mortality.

19 Le Betteravier. Quand 14 agriculteurs de l'Aisne deviennent apiculteurs (When 14 farmers from Aisne became beekeepers).

20 20 Minutes. Toulouse: Pour suivre la mortalité des abeilles, BeeGuard met au point un compteur vidéo sur ses ruches connectées (Toulouse: to monitor bee mortality, BeeGuard installs a video-based counter on its beehives).

4.2 On the ECI's call to "restore natural ecosystems in agricultural areas so that farming becomes a vector of biodiversity recovery":

4.2.1 the EESC stresses that human activity, such as certain agricultural practices, is one of the reasons for the decline in pollinators and biodiversity, but that agriculture can also be a solution. For example, it would like to see more support for projects such as the replanting of hedges or the development of melliferous resources by farmers, in order to dedicate the latter to the protection of bees and biodiversity. At the same time, it will be essential to pay farmers better for the ecosystem services they provide, in order to support them in carrying out such projects.

4.2.2 The EESC notes the Commission's strong ambition for agriculture to become a means of restoring biodiversity, with the objectives and measures of the Biodiversity and Farm to Fork strategies and the draft Nature Restoration Regulation, and expresses its concern about respect for the EU's food sovereignty.

4.2.3 The EESC believes that use should also be made of voluntary agricultural initiatives that favour pollinators and biodiversity, which are disappearing throughout Europe. For example, in France, the FNSEA has published a compendium of agricultural initiatives that favour pollinators[21]. Aimed at spreading good practices in the area of bees and agriculture, it identifies voluntary initiatives in France favouring pollinators, compiling inspiring, positive and pragmatic examples. On the same principle, a communication campaign entitled "10 bee-friendly recommendations for your farm"[22] was launched in Denmark in 2018. It promotes various voluntary initiatives that farmers can implement on their farms, such as planting hedges and flower strips, or reducing spray drift when plant protection products are applied by spraying under appropriate weather conditions (e.g. low wind) or by using drift reduction systems.

4.2.4 The EESC believes that in order to restore natural ecosystems in agricultural areas, the Commission will need to draw on a set of levers: maintenance and restoration of agro-ecological infrastructure; crop diversification in order to promote a crop mosaic in the landscape; development of agroforestry, organic farming and products with official quality and origin indicators; maintenance of permanent grassland; reduction in the use and impact of pesticides, etc.

4.3 Concerning the ECI's call to "reform agriculture by prioritising small scale, diverse and sustainable farming, supporting a rapid increase in agro-ecological and organic practice, and enabling independent farmer-based training and research into pesticide- and GMO-free farming":

4.3.1 The EESC points to the existence of a report produced by 300 experts from 23 Member States who have analysed the potential impacts of the future CAP on biodiversity protection and

21 EFSA, 2022. Recueil des initiatives agricoles favorables aux pollinisateurs (Compendium of agricultural initiatives favouring pollinators).

22 Danish Agriculture & Food Council, 2018. 10 bee-friendly recommendations for your farm.

restoration[23]. The scientists make specific proposals to improve the CAP's impact on biodiversity and to support farmers in this transition. The EESC recommends that the Commission and the Member States draw inspiration from this in the context of CAP reform, which is a powerful tool for agricultural reform.

4.3.2 Nevertheless, the EESC considers that the agro-ecological transition and the improvement of biodiversity cannot happen from Brussels only via the CAP, and also stresses the importance of the local level. Local solutions must also be developed with farmers and landowners in order to adapt to the specific characteristics of regions.

4.3.3 In addition, the EESC stresses its commitment to finding effective alternatives so as to leave no farmer without a solution. It would therefore like to encourage more precision agriculture, digital agriculture, biological control, robotics as well as agro-ecology, with a significant financial component for the development of research, the implementation of innovation, and the uptake of innovation by sectors and farmers.

4.3.4 The EESC recognises the importance of beekeeping as an economic sector in many Member States, which contributes in particular to rural development and the maintenance of local populations. Given the shortage of honey production in Europe, support for beekeeping and the economic development of honey and other bee products (pollen, wax, royal jelly, etc.) should be bolstered in order to maintain an apiculture sector that is professional, environmentally friendly, and capable of meeting the demand for honey consumption in Europe. The EESC considers it important for beekeepers to form professional organisations so as to better organise themselves and defend the interests of European beekeeping more effectively. In particular, it would like the Commission to seize the opportunity of the upcoming revision of the Honey Directive to strengthen the labelling and traceability of honey in order to more effectively combat fraud in this area as well as imports from non-EU countries that do not comply with our standards, which undermine EU honey production.

4.3.5 Finally, in order to ensure that the agro-ecological transition is acceptable to European farmers, the EESC recommends that the Commission rapidly implement the reciprocity of standards in order to limit distortions of competition for European farmers.

Brussels, 15 December 2022

Christa Schweng
The president of the European Economic and Social Committee

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[23] Pe'er et al., 2022. How can the European Common Agricultural Policy help halt biodiversity loss? Recommendations by over 300 experts.