



Bee Life European Beekeeping Coordination

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To: Commissioner Borg
European Commissioner for Health and Consumer Policy European Commission
B-1049 Brussels.

Louvain-la-Neuve, 13.12.2013

Object: Cyantraniliprole: a new systemic molecule highly toxic for bees

Dear Commissioner Borg,

A new active substance, cyantraniliprole is currently following the procedure of authorization at EU level, United Kingdom being the Rapporteur Member State and France, the co-rapporteur, in accordance with Commission Regulation (EC) No. 1107/2009.

Seven cyantraniliprole formulations from Syngenta and DuPont were considered in the Draft Assessment Report (DAR), of which four are candidates for the EUⁱ. Authorizations for the other formulations “may, in the future, be applied for in the EU and therefore these study evaluations may then be of use in carrying out risk assessments” (Vol 1, 1.1). Please note, that among these other three formulations, Syngenta proposes a mixture of cyantraniliprole and thiamethoxam. The last molecule having been banned in the EU, this mixture formulation should always be prohibited in the EU.

Cyantraniliprole formulations proposed for the EU are mainly applied as post-emergent foliar spray (with ground or aerial equipments), or by drip irrigationⁱⁱ. They have to be applied 1 to 4 times in the EU (and even to 9 times in the US) with a 3- to 14-day spray interval depending on crop, pest, and regions (Vol 1, 1.5.3) and sometimes during blossoming meaning that bees may be exposed during long period and high doses of products.

Cyantraniliprole is a larvicide, ovicide and also adulticide (Vol 1, 1.5.2). This is a broad-spectrum insecticide for the control of a range of sucking and chewing pests in a huge range of plants: fruit crops, tree nuts, oil seed crops, cotton, grapes, rice, vegetables, ornamentals, and turf, meaning that it will be spread in huge part of the environment. Cyantraniliprole is classified as “highly toxic for bees”. Cyantraniliprole is a systemic molecule, residues of cyantraniliprole and its metabolites have been found in pollen and nectar of treated plants, independently of the mode of application of the product. Contamination of guttation water, wax, and honey was also highlighted (Vol 3, B.9.4).

In 2012 and 2013, the EFSA has published various scientific documents on the risks of pesticides for bees^{iii iv}. All these reports highlights that current risk assessment scheme for pesticides on bees are not capable to take into account the different sources of risks that new generation of pesticides, such as systemic pesticides, may pose to bees (e.g.

risks such as chronic toxicity that pose lethal or sublethal effects; risks on bee brood, larvae, nymphs). Taking into consideration the EFSA scientific outcomes, DG SANCO opted for a partial ban of neonicotinoids and fipronil in the EU.

Although cyantraniliprole has similar proprieties to fipronil and neonicotinoids, the molecule has been assessed according to the classic risk assessment scheme. EFSA Scientific Opinion considers this scheme as insufficient, in particular for systemic molecules. This would be totally incoherent to consider the assessment of cyantraniliprole as sufficient in regards to the risks it would pose for bees.

The risk assessment of non target organisms is either not finalized or has identified risks for non target species in field condition (Vol 1, 3.1.7). Therefore, we urge you to not include cyantraniliprole in the annexe I of Regulation (EC) 1107/2009 or at least to postpone the decision until a complete risk assessment is produced.

Please, find attached further comments to explain our purposes and concerns regarding the DAR of cyantraniliprole.

Finally, to make the reading easier for every citizen, it would be useful to join to future DAR a summary explaining the dossier in a structured and summarized format, highlighting some key information. As an example, the Australian Pesticides and Veterinary Medicines Authority offers an example of a user-friendly risk assessment summary.

We remain available for any further consultation on this important subject.

Thank you very much for your attention.

Yours sincerely,



Francesco Panella
President for Bee Life European Beekeeping Coordination

ⁱ DuPont: 100 g/L OD, 100 g/L SE and 200 g/L SC and Syngenta: 400 g/kg WG (solo) or A16971B – where Oil Dispersion (OD), Suspo-emulsion (SE), Suspension concentrate (SC), Water Dispersible Granules (WG)

ⁱⁱ Other cyantraniliprole formulations are also applied at-plant to the soil in-furrow, seedling box, shank injected, or via transplant, water drench treatments; and as a seed treatment.

ⁱⁱⁱ EFSA (2012) Scientific Opinion on the science behind the development of a risk assessment of Plant Protection Products on bees (*Apis mellifera*, *Bombus* spp. and solitary bees). EFSA Journal 2012;10(5):2668 [275 pp.]. doi:10.2903/j.efsa.2012.2668

^{iv} Conclusion on the peer review of the pesticide risk assessment for bees for the active substance clothianidin, thiamethoxam, imidacloprid, <http://www.efsa.europa.eu/en/press/news/130116.htm>