



Dr. Catherine Geslain-Lanéelle,
Executive Director
EFSA

Re: statements on EFSA website on decline of bee populations and GM plants

27 May 2013

Dear Dr. Geslain-Lanéelle,

I respectfully draw your attention to the page titled "Bee Health", on the EFSA website under "Animal Health"¹.

That page and the included video discuss the importance of honey bees for agricultural production, as well as the observed and indeed worrying decline of bee populations over the last 15 years, particularly in Western European countries such as France, Belgium, Switzerland, Germany, the UK, the Netherlands, Italy and Spain.

The website and video continue to say "*No single cause of declining bee numbers has been identified. However, several contributing factors have been suggested, acting in combination or separately. These include the effects of intensive agriculture and pesticide use, starvation and poor bee nutrition, viruses, attacks by pathogens and invasive species, genetically modified plants, and environmental changes (e.g. habitat fragmentation and loss).*"

The website and video next elaborate EFSA's work, with quite some detail about the work of EFSA's GMO panel, including assessment of possible effects on non target organisms and evaluation of Post Market Environmental Monitoring.

PRRI believes that the way in which genetically modified plants are referenced in this context makes it for several reasons very vulnerable to misinterpretation.

First, the list of factors that "have been suggested as a contributing cause for the decline of bee numbers" is clearly not a random list of any possible factor that has been suggested, but is a selection made by EFSA from the very many possible factors that have been suggested over time. Those suggestions ranged from pesticide use and environmental degradation, via the practice of some beekeepers of feeding their bees fructose instead of honey, up to the theory that visitors from another planet have decided they were going to abduct the smartest organisms on the planet². In short, the selection made by EFSA suggests relevance and significance.

Second, including in a list of factors that are known to have an effect on bees (such as certain pesticide use, starvation, pathogens, and environmental change), an unqualified and unsubstantiated reference to 'GM plants' is highly inappropriate, in particular given the crucial role EFSA has.

¹ <http://www.efsa.europa.eu/en/topics/topic/beehealth.htm?wtrl=01>.

² <http://www.smithsonianmag.com/science-nature/interview-berenbaum.html>

In addition, it is not only what is said on the website and in the video that makes it very vulnerable to misinterpretation, but also what is not said on the web site and in the video.

Where it is explained that the risk assessment of EFSA's GMO panel includes assessment of possible effects on non target organisms such as bees, it would have been appropriate to include reference to the fact that for none of the GM plants that have been assessed by EFSA for cultivation in the EU, the risk assessments gave reason to believe that a negative impact on bee numbers was likely.

Where Post-Market Environmental Monitoring Plans (PMEM) are explained, it would have been appropriate to also explain that EFSA's review of the annual PMEM reports for cultivation in the EU have not shown any data that would suggest negative effects on bee numbers.

Finally, to place this issue in context, it would have been appropriate to explain that while in theory certain traits in GM plants can - hypothetically - have an impact on bees, there is absolutely no reason to assume that the decline of bee populations in France, Belgium, Switzerland, Germany, the UK, the Netherlands and Italy that started 15 years ago, might somehow be related to the cultivation of GM maize in Spain and in some places in Portugal and the Czech Republic that started less than 10 years ago.

Given that the website does provide some detail about the work of the Pesticides Unit with regard to thiamethoxam in relation honeybees, it would have been appropriate to give similar level of detail in relation to EFSA's work on GM plants.

We therefore strongly urge EFSA to correct and complete the information on the website and in the video as soon as possible. For your information we also include the article "*Pollen of current generation genetically modified crops is not harmful to bees*" produced by the life sciences research institute VIB in Belgium.

Please do not hesitate to contact us via info@prri.net if you wish to discuss this matter further.

Yours sincerely,



Em. Prof. Marc Van Montagu , Chairman of the Public Research and Regulation Initiative (PRRI)

Cc: DG SANCO, DG Research