



Statistics of the Public Consultations

Draft Guidance on the risk assessment of plant protection products on bees (*Apis mellifera*, *Bombus* spp. and solitary bees)

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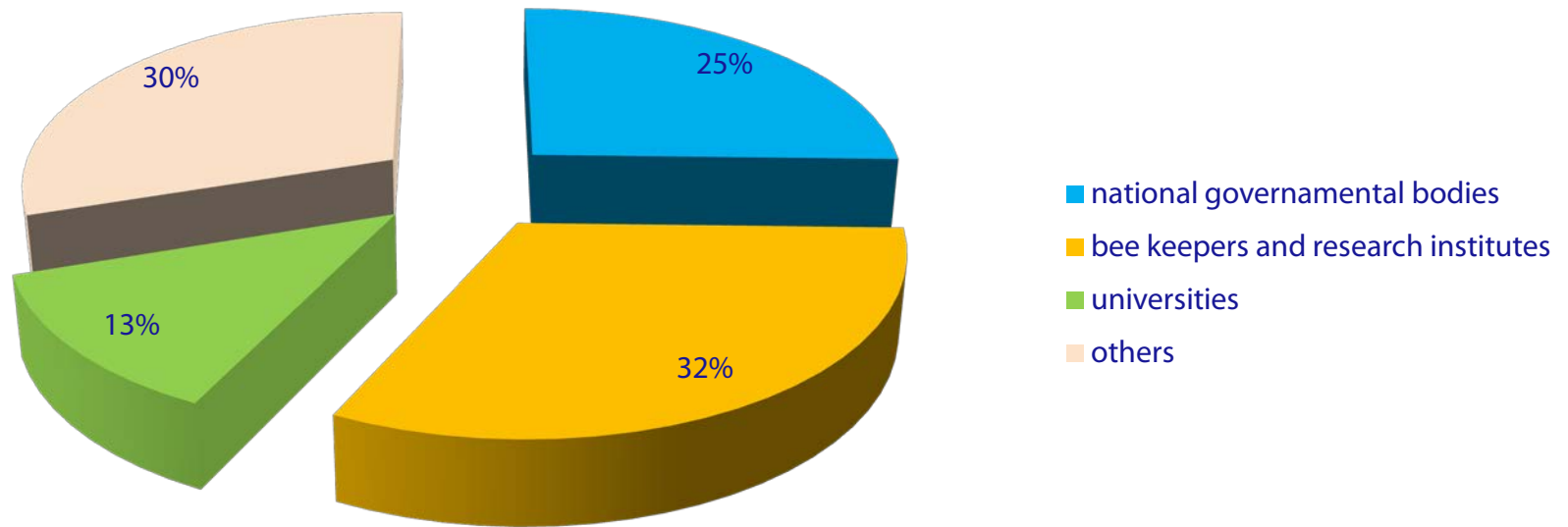
Parma, 9th September 2013

- **1st Public Consultation open from 20/09/2012 till 1/11/2012**
 - Nr of comments: **852**
 - Nr of commentors: **63**
 - EU (**811**), Switzerland (**28**), Norway (**7**) and USA (**6**)

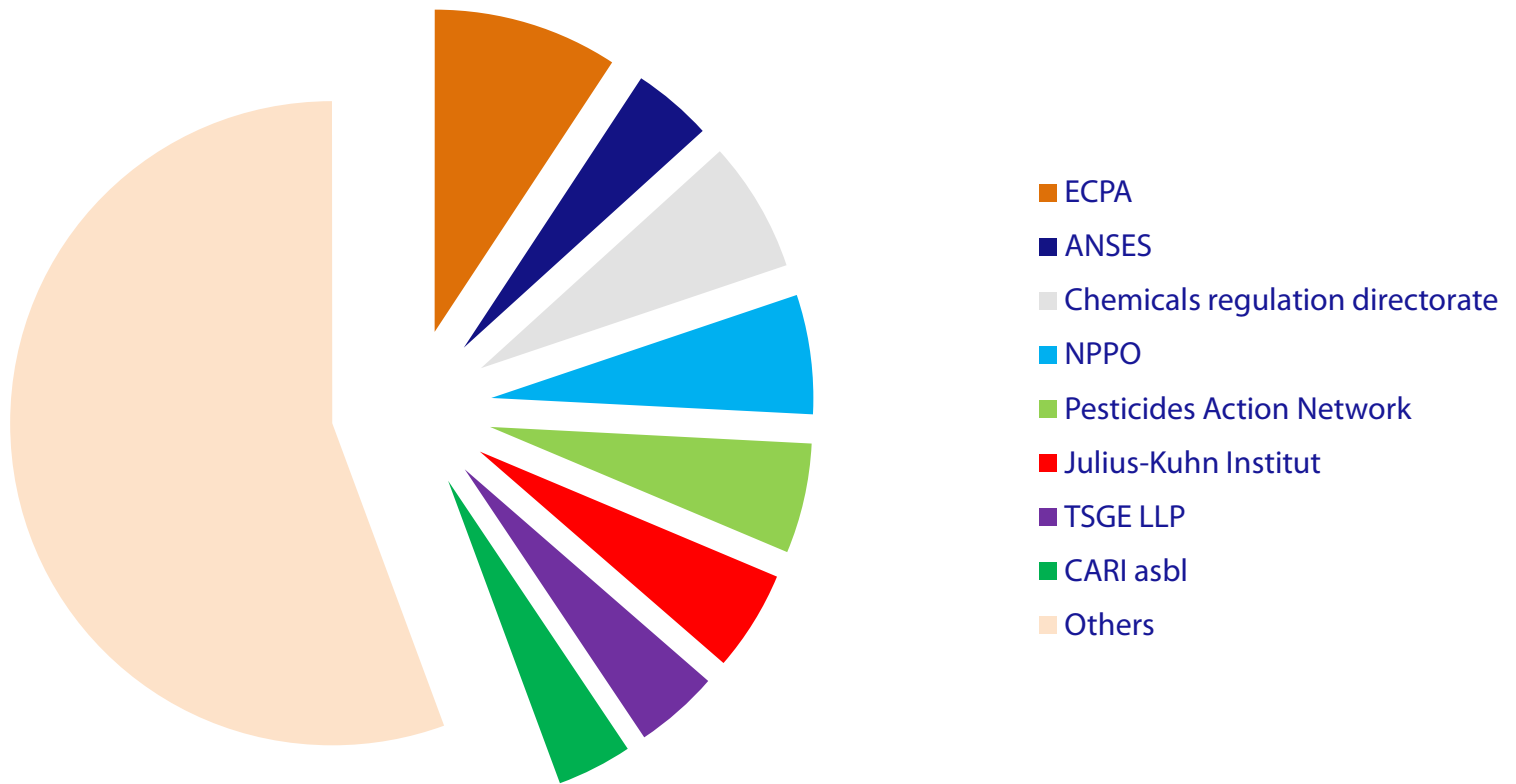
- **2nd Public Consultation open from 15/02/2013 till 18/03/2013**
 - Introduction of risk assessment on exposure to **contaminated water** and **metabolites**
 - Nr of comments: **176**
 - Nr of commentors: **30**
 - EU (**176**)

1st Public Consultation

participants per category

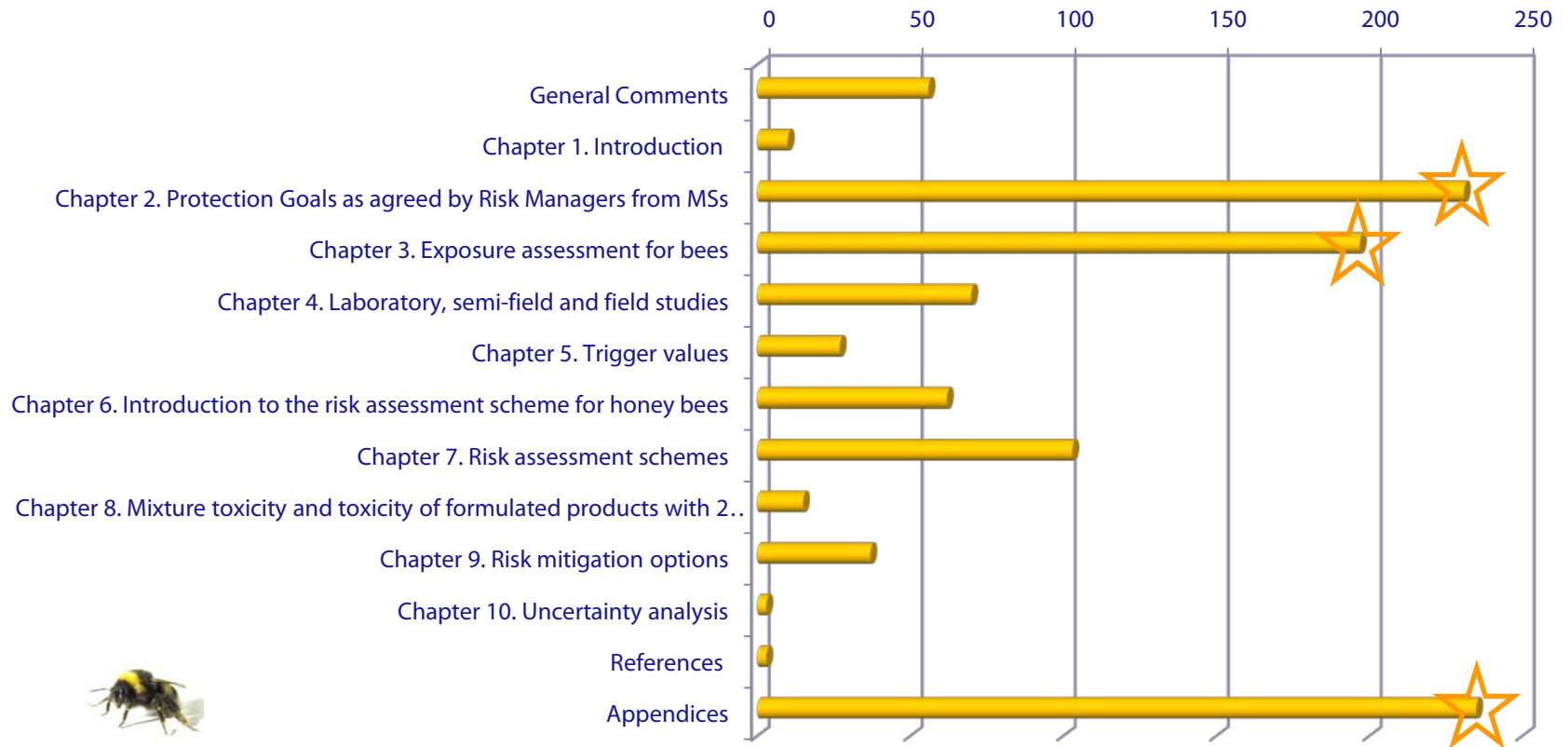


1st Public Consultation participants



1st Public Consultation

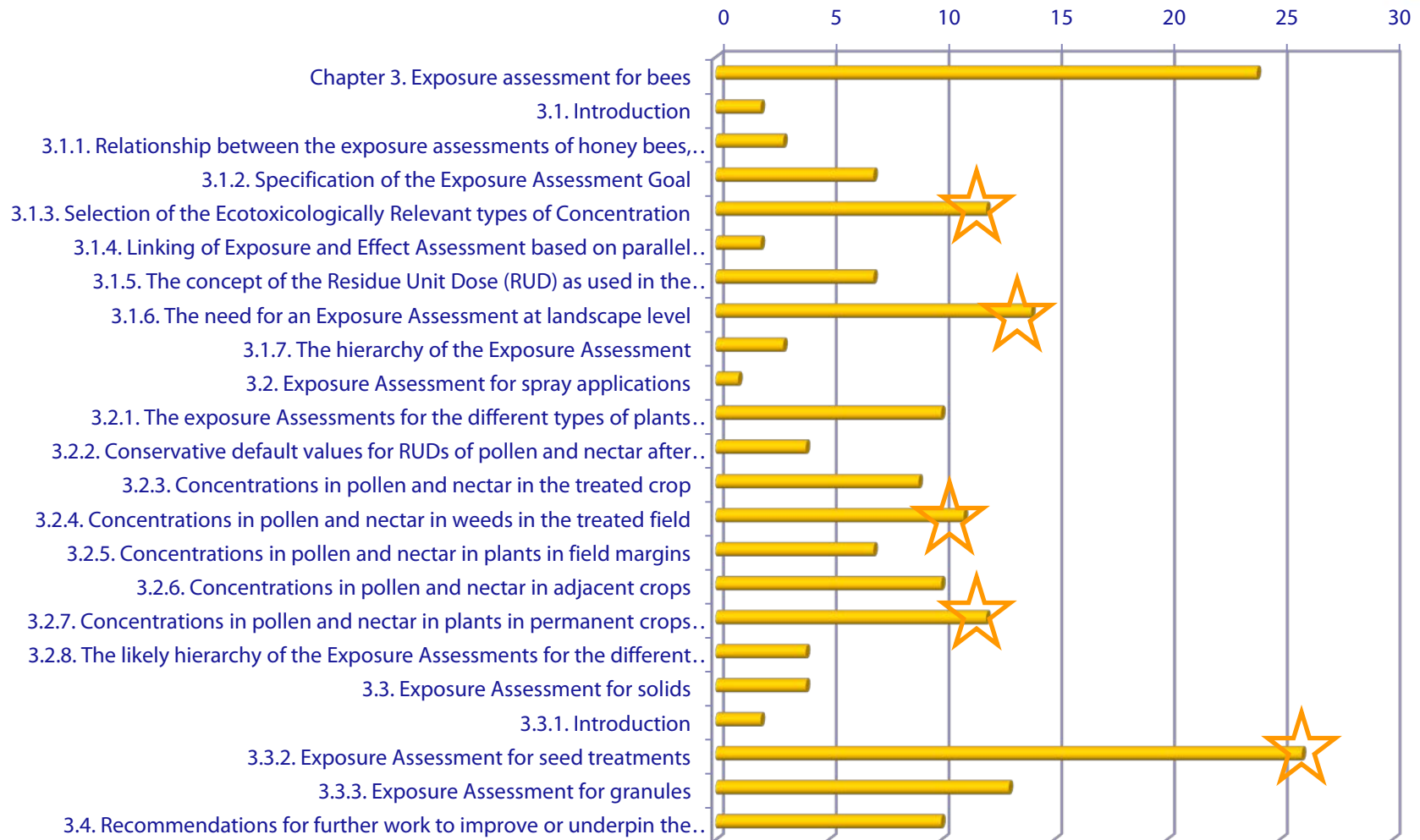
comments per topic



- Many comments on the proposed model for simulation of the bee population
 - lack of dynamics
 - lack of parameterisation
 - Not realistic
- Discussions on the use of the 90th percentile
- Highlighting difficulties of having non exposed controls in field studies

1st Public Consultation

comments per topic (detail Chapter 3)



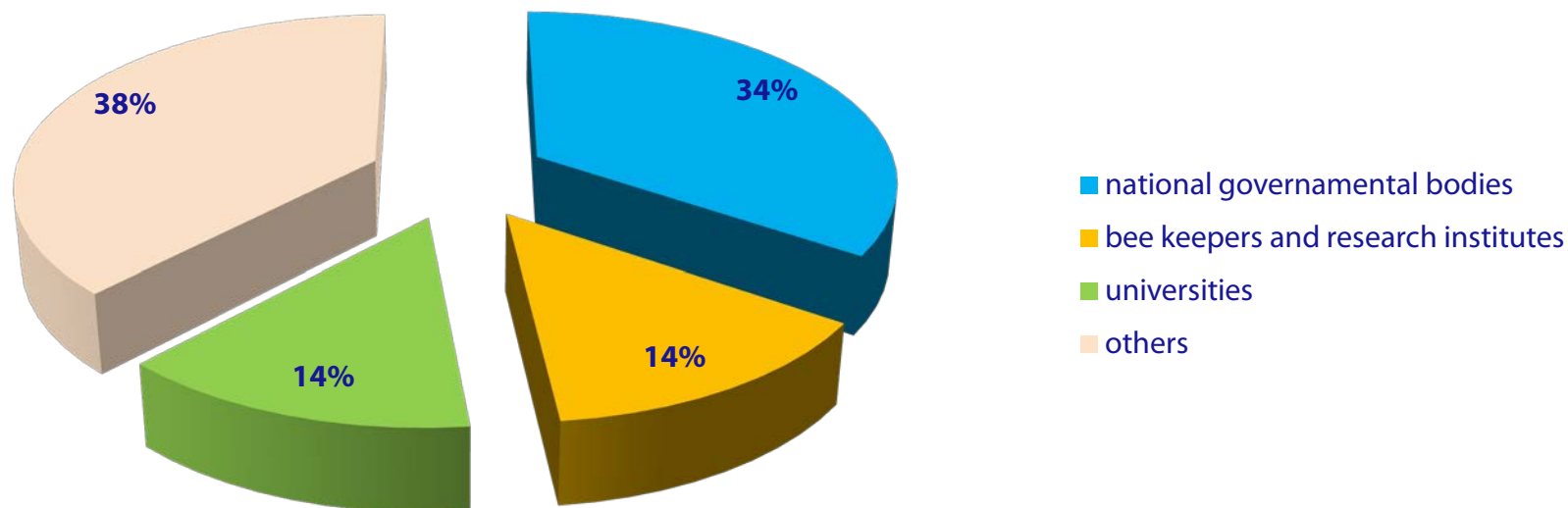
- Ecotoxicological relevant types of concentrations
 - Importance and risks of honeydew
 - Importance and risk of various water sources (included in final guidance)
- Need for exposure assessment of Landscape
 - Comments on the difficulty of defining landscapes and inadequate knowledge on preferences of bees when presented with various foraging options
- Seed treatments
 - Mostly comments on dust production and the relation with used seeding technology and formulations



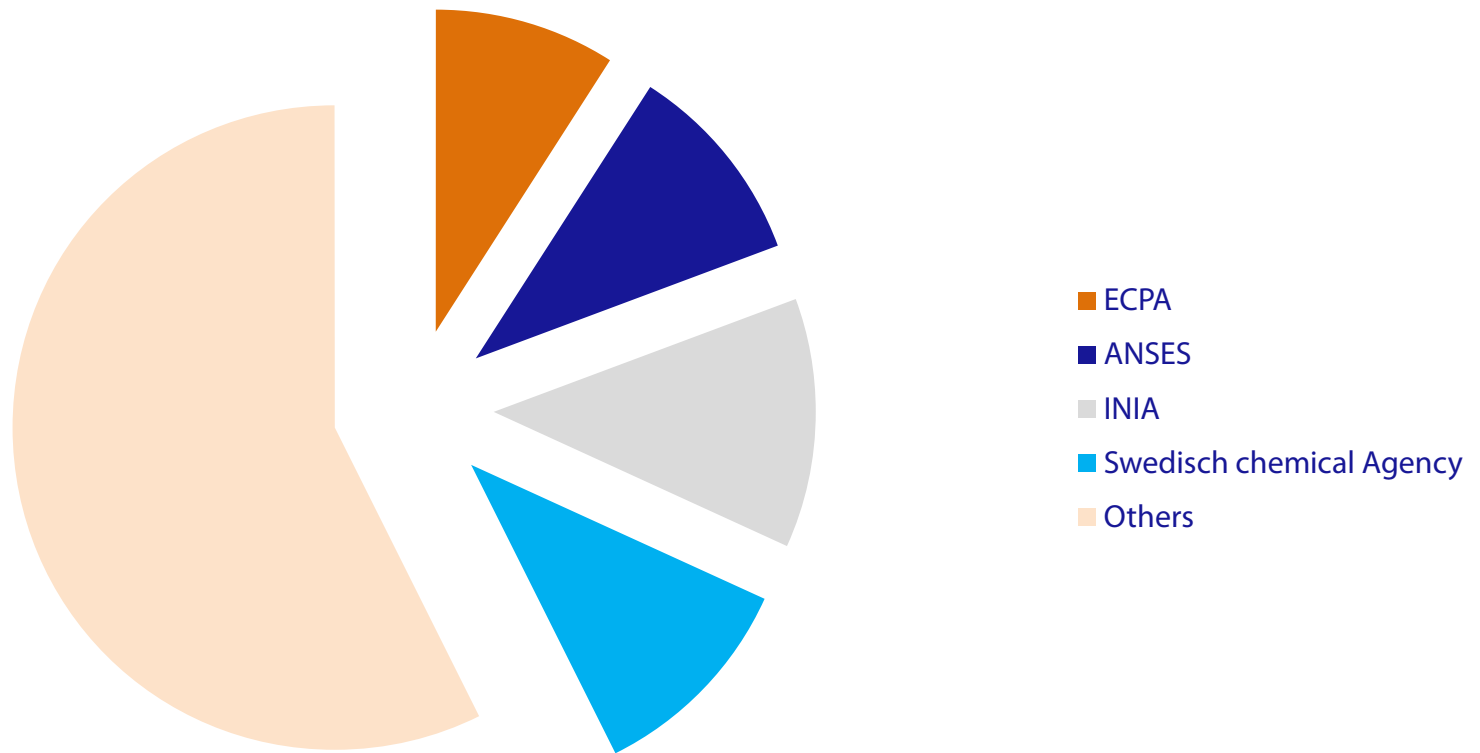
- Concentration in pollen and nectar in weeds in the field
 - Very hard to test in the field
 - Discussion on attractiveness for bees and species to be selected
 - Might trigger higher use of herbicides to avoid this exposure route
- Permanent crops and succeeding annual crops
 - Mostly discussions on the use of the DT50 and the definition and calculation of soil residues

2nd Public Consultation

participants per category

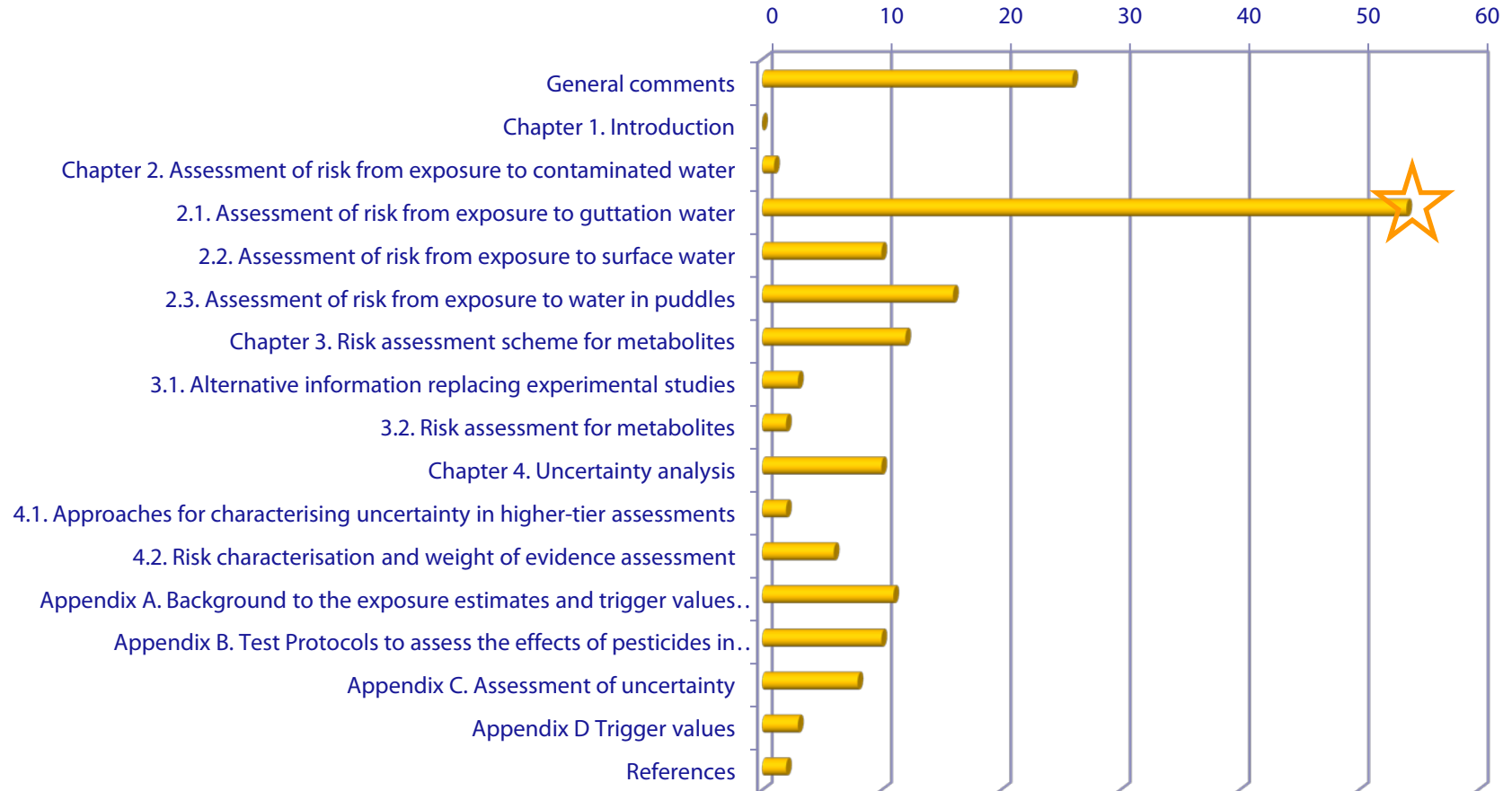


2nd Public Consultation participants



2nd Public Consultation

comments per topic



- Risk of exposure to guttation water
 - Guttation is plant species dependent
 - Guttation is weather dependent
 - Especially important for systemic PPP and their metabolites (also soil metabolites play a role)
 - Concentration based on water solubility
 - When will bees use guttation water ?
 - Field testing practicalities ?



- Good overall participation
- Good balance between various stakeholders
- A lot of extra information gathered for the development of the guidance



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