



Bayer CropScience Statement on EFSA Conclusions on the Bee Risk Assessment of Imidacloprid and Clothianidin

Bayer CropScience does not believe that the new EFSA reports alter the quality and validity of the existing risk assessments and the underlying data set for imidacloprid and clothianidin.

We have generated extensive safety data for our neonicotinoid-containing crop protection products. These have been reviewed and approved by the competent EU and Member State authorities reflecting the agro-environmental conditions in the respective member states.

The absence of any unacceptable risk by these products has been further demonstrated by monitoring data under more recent practical use conditions from all over Europe.

There have been significant stewardship improvements implemented over the last 5 years. Unfortunately risk mitigation measures were not considered in the EFSA reports, likewise EFSA omitted comprehensive data sets and evidence available to them in their assessment.

Strict regulations for the approval of crop protection products have been put in force by competent authorities on EU and member state level. However, the EFSA reports are based on only recently published scientific opinion and guidance documents for risk assessment as well as for seed treatment. Both guidance documents have not yet been discussed by the competent authorities and are not yet in force.

The unfavorable risk conclusion of EFSA is not based on new information but just on the fact that more conservative, *but* not yet validated, criteria have been applied. Furthermore, numerous studies conducted under relevant field conditions in different member states were not considered in the EFSA evaluation.

With the evaluation principles as applied here, such a risk would be concluded for any kind of plant protection product.

Bayer CropScience has always been proactively working on closing data gaps and continues to be open to constructive dialogue with the competent authorities, on all relevant points relating to the safety of our products. We are convinced that our seed treatment uses, if applied according to the label instructions, do not pose an unacceptable risk to bee colonies and are committed to the continuous development and implementation of stewardship measures.