

Opinion of the European Economic and Social Committee on ‘Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the Revision of the EU Pollinators Initiative — A new deal for pollinators’

(COM(2023) 35 — final)

(2023/C 349/26)

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1. Conclusions and recommendations

1.1. The European Economic and Social Committee (EESC) supports the Commission's ambitious Communication ⁽¹⁾, which responds to the trend of declining wild pollinators in the EU. Nevertheless, it considers that insufficient progress has been made five years after the original initiative, particularly in terms of obtaining the requisite data that would drive policy action forward. The EESC notes a lack of a clear governance on the implementation of the proposed actions and urges the Member States to swiftly endorse the current Communication.

1.2. The decline of pollinators is attributed to a variety of factors, including insufficient food sources, a lack of crop rotation practices, pesticide management in different Member States, pesticide consumption per hectare of agricultural land, the conduct of urban and rural inhabitants, invasion of non-native species of insects and plants, predators, beekeepers' management methods, pathogenic infections including viruses and climate change considerations. The Committee welcomes the introduction of a pan-European system for monitoring and governing pollinators (EU-PoMS).

1.3. The EESC deems it crucial to enhance administrative capability in all Member States and strengthen collaboration among public authorities, private stakeholders, research institutions and agricultural stakeholders. The Committee also highlights a scarcity of specialised professionals in this area.

1.4. The Committee strongly calls for significant funding for R & D&I to amass essential scientific data and undertake appropriate initiatives to reverse the decrease in pollinator populations, including within the Horizon Europe programme. EU-level coordination is essential for ensuring that national data is consolidated and analysed via a dedicated EU platform for pollinators, which allows open access to data.

1.5. The EESC advocates the creation of a programme and strategy for pollinator-friendly urban areas, augmenting land-use management practices to foster diversity among pollinators and conserve natural habitats in urban and peri-urban regions.

1.6. To reach significant progress, the EU and the Member States must rapidly share knowledge and concentrate research on sustainable agriculture practices and effective methods of integrated pest management (IPM).

⁽¹⁾ COM(2023) 35 final.

1.7. The EESC calls for appropriate education for farmers regarding environmental measures through national and regional farm advisory systems, encompassing the use of low-risk pesticides that pose no harm to pollinators and IPM. Training programmes that aim to increase knowledge about pollinator ecology, identification, and habitat restoration are also needed.

1.8. The Committee calls for an EU study aimed at providing accurate data on the impact of electromagnetic radiation emitted by telecommunication antennas on wild pollinators in their natural habitats and on the necessary policy measures to ensure effective pollinator protection.

1.9. The EESC stresses the need to create a metric for light pollution across the EU, using satellite data, in order to evaluate and observe the regional and local effects on pollinators.

1.10. The Committee welcomes the Commission's request for support from the Committee of the Regions for the implementation of the pollinators initiative, but is disappointed that the EESC was not once mentioned in the two initiatives so far, especially regarding its capacity to promote this strategy among different categories of stakeholders, including through raising awareness among the national social partners, civil society organisations and citizens.

1.11. The Committee highlights the need for proper funding to meet the expectations outlined in the Commission Communication and ensure consistency among the different policy measures and instruments that impact the conservation of wild pollinators. Funding must also be provided to better inform the public at large about the decline of pollinators and the impact on our lives, as well the impact of non-action on future generations.

1.12. The implementation of strong measures is essential to safeguard wild pollinators during the pesticide risk assessment process and usage phase. The EESC calls for greater transparency regarding pesticide use within the EU and in third countries.

1.13. The most effective solution is to reach a worldwide agreement to reduce the use of synthetic pesticides, ensuring universal commitment and fair competition. Although this appears to be a difficult task, a holistic approach is needed and more efforts need to be put into international negotiations. This includes a serious discussion about an export-ban of pesticides, which are already banned for use in the EU.

2. General comments

2.1. Recognising the essential benefits of pollinators and the ecosystem services they provide is crucial to attaining several of the UN Sustainable Development Goals. Pollinators serve as a crucial gauge for determining the health of our environment, providing indispensable economic, social and cultural benefits.

2.2. The Commission has prepared a review of the EU pollinators initiative, which seeks to respond to the trend whereby wild pollinators are in decline in the EU. The EESC supports the ambitious Communication but concludes that, five years after the original initiative, little progress has been made, especially with regard to having all the necessary data available that would actually drive policy action forward.

2.3. Pollinators are not only an essential part of functioning ecosystems, but also the base for life on our planet. Thousands of different wild pollinator species are known, with bees being the famous one. Different factors have an impact on the decline of wild pollinators and the EESC emphasises the importance of using the precautionary principle to safeguard them.

2.4. The EESC appreciates the ambitious plans set out in this communication, but notes that it is a long list of future projects that will need sufficient timeframes. The EESC would have expected, due to time pressure, clear short-term measures and actions that would build on the lessons learnt so far, based on the report on the original pollinators initiative^(?). The Committee points to the need for cross-sectoral — and at the same time immediate — action across the Member States, and welcomes the introduction of a pan-European system for monitoring and governing pollinators (EU-PoMS).

^(?) COM(2021) 261 final.

2.5. The EESC urges the Member States to rapidly agree and engage on the actions that have to be taken in the short, medium and long term, and is expecting a swift endorsement of the current Communication.

2.6. *Factors influencing the decline of pollinators*

2.6.1. There are numerous factors that affect the occurrence of pollinators in the wild ⁽³⁾. Among the most important are the environment, the lack of crop rotation and farmers' focus on maximising production, but also the behaviour of urban and rural dwellers. The decline of pollinators can also be attributed to other factors like insufficient food sources, attacks by invasive species of insects and plants, predators, pesticide management in rural and urban areas, beekeepers' hive management practices, and, most significantly, pathogenic infections including viruses and climate change factors.

2.6.2. The Committee notes that there is a clear relationship between pollinator decline and pesticide consumption per hectare of agricultural land and food production within the Member States ⁽⁴⁾. Emergency authorisations of pesticide use by Member States are an example of the problems in practice of how to manage plant protection efficiently and ensure the quality and quantity of production. The European Food Safety Authority determined that alternatives were available for approximately only one third of the exceptions to emergency derogations regarding the use of these neonicotinoids. The EESC recalls the European Court of Justice decision of 19 January 2023 in Case C-162/21 according to which Member States cannot grant any further emergency authorisations for products containing neonicotinoids.

3. **PRIORITY I: Improving knowledge of pollinator decline, its causes and consequences**

3.1. The EESC considers that there is an acute need to increase the administrative capacity in the Member States and the cooperation between public authorities and private stakeholders, including research institutes and scientists, without leaving behind the agricultural sector.

3.2. Sharing knowledge and expertise and undertaking collective efforts among different stakeholders are crucial to devising cost-effective measures and leveraging synergies. Such a comprehensive approach requires effective collaboration among policymakers, stakeholders, and the public at large.

3.3. The EESC notes that in addition to the decrease in pollinator populations, there is also a shortage of human experts in the field. National efforts to ensure data collection must be coordinated at EU level, including data gathering and analysis, within an EU platform dedicated to pollinators that facilitates open access to data. Such a platform enables individuals to contribute to a collective effort, building an open-source community of data and a repository of verified algorithms and models.

3.4. The Committee is calling for concrete and significant R & D & I funding in order to gather all the necessary scientific information and pursue adequate initiatives to reverse the pollinator decline.

3.5. The EESC appreciates the fact that after the initial initiative was adopted, the Commission incorporated a specific topic about pollinators into the 2018–2020 work programme for Horizon 2020. Additional funding for pollinator research must be allocated within the Horizon Europe programme, including but not limited to research on the reasons behind the decline and for monitoring pollinator species and populations within the EU, including in urban areas.

4. **PRIORITY II: Improving pollinator conservation and tackling the causes of their decline**

4.1. The EESC recognises the importance of available data on pollinators to further define strategies in pollinator conservation and expects specific and quantifiable targets at EU and Member State level to restore pollinator populations and habitats in the EU.

⁽³⁾ Opinion of the European Economic and Social Committee on 'European Citizens Initiative — Save bees and farmers' (own initiative opinion) (OJ C 100, 16.3.2023, p. 45).

⁽⁴⁾ Eurostat, Agri-environmental indicator — consumption of pesticides.

4.2. The EESC suggests that a crucial initial action is to map the current and possible urban habitats and networks for pollinators, and supports the Commission initiative to encourage cities to implement the guide for pollinator-friendly cities⁽⁵⁾. Additionally, the EESC advocates the establishment of a programme and vision for cities that are friendly to pollinators, enhancing land-use management to promote pollinator diversity and conserve areas for nature in urban and peri-urban regions. The Committee has already advocated that 'land must be managed carefully in all Member States, ensuring the right balance between competitiveness and sustainability, and providing the necessary funding opportunities'⁽⁶⁾.

4.3. To stabilise the number and abundance of pollinators in the countryside, it is essential to create suitable conditions through the management of farmland. The EESC emphasises that more sustainable food systems will not be achieved without public policies that provide adequate financial support to farmers. The funding from the CAP is not the only possibility to manage support.

4.4. Any measure to help stabilise pollinator distribution must be realistically assessed. Potentially conflicting measures must be ruled out and appropriate measures systematically promoted. The EESC believes that clear governance on the implementation of the proposed actions is lacking, and considers that a significant discrepancy will occur between the efforts of different Member States.

4.5. The high variation in the use of pesticides per hectare of agricultural land across the Member States leads to disparities not only in nature conservation but also in production. The EU and Member States should swiftly expand the distribution of knowledge and focus research efforts on agroecology, sustainable use of pesticides and good practices of IPM.

4.6. The EESC recommends implementing a transparent control system to enforce the same maximum residue levels for pesticides in imported food products as those set for food produced in the Union. The Committee has already called for the Commission to rapidly implement reciprocity of standards in order to limit distortions of competition for European farmers⁽⁷⁾. Consumers should be protected and quality products should be offered at fair prices.

4.7. The EESC calls for appropriate education for farmers on environmental measures through national and regional farm advisory systems, including the use of low-risk pesticides and IPM.

4.8. Indicators of pollinator population status need to be developed by 2024 so that the indicators can be assessed within the CAP. An essential step is to carry out a comprehensive evaluation of the impact of the CAP in preventing the decline of pollinators and to encourage practices that reverse this decline. The Member States should promote directing technical assistance funds provided within the CAP towards pollinators, while using additional funds for the protection of consumers and the environment.

4.9. Flowering strips are a good reservoir for different pollinator species and will undoubtedly contribute to the protection of pollinators. However, they could be a risk to bees and other pollinators if these strips are sown near groundwater and the pesticides in question are still in the soil. To this end, funds would be needed to research and develop a clear methodology for flowering strips.

⁽⁵⁾ European Commission, A guide for pollinator-friendly cities.

⁽⁶⁾ Opinion of the European Economic and Social Committee on 'Proposal for a regulation of the European Parliament and of the Council amending Regulations (EU) 2018/841 as regards the scope, simplifying the compliance rules, setting out the targets of the Member States for 2030 and committing to the collective achievement of climate neutrality by 2035 in the land use, forestry and agriculture sector, and (EU) 2018/1999 as regards improvement in monitoring, reporting, tracking of progress and review' (COM(2021) 554 final) (OJ C 152, 6.4.2022, p. 192).

⁽⁷⁾ Opinion of the European Economic and Social Committee on 'Proposal for a Regulation of the European Parliament and of the Council on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115' (COM(2022) 305 final — 2022/0196 (COD)) (OJ C 100, 16.3.2023, p. 137).

4.10. According to certain scientific studies ⁽⁸⁾, the electromagnetic radiation emitted by telecommunication antennas can impact the population of wild pollinators in their natural habitats. Furthermore, in 2018, the European Commission's Scientific Committee on Health, Environmental and Emerging Risks (SCHEER) rated the risk of electromagnetic radiation (particularly that linked with 5G) negatively impacting the environment as the highest possible ⁽⁹⁾. Additional assessments conducted by the Eklipse programme, as well as independent researchers have confirmed that electromagnetic fields can plausibly harm populations of insects ⁽¹⁰⁾. The Committee calls for an EU study that will provide accurate data on this matter and on the necessary policy actions to ensure efficient pollinator protection.

4.11. The EESC deems necessary that an EU-wide light pollution metric based on satellite data be developed in order to assess and monitor regional and local impact on pollinators.

4.12. The funds provided by EU cohesion policy can be used to invest in protecting and restoring nature and biodiversity, mitigating climate change and ensuring sustainable urban development, such as the implementation of nature-based green infrastructure for pollinators. The EESC appreciates the Commission's recommendation 11.2 in this regard.

5. PRIORITY III: Mobilising society and promoting strategic planning and cooperation at all levels

5.1. The EESC welcomes the Commission's request for support from the Committee of the Regions for the implementation of the pollinators initiative among local and regional authorities. The Committee is, however, disappointed that the EESC was not once mentioned in this initiative ⁽¹¹⁾ or in the original initiative ⁽¹²⁾, especially regarding its role as the voice of EU civil society. It appreciates that specific duties should be given to the EESC to promote this strategy among different categories of stakeholders, including through raising awareness among national social partners and civil society organisations and citizens.

5.2. Specific communication tools should be used for raising awareness among citizens about the decline of pollinators and its impact on our lives — as well the impact of non-action (including economic, social and environmental implications the future generations) — and of promoting information campaigns in the public media in all Member States. Funding must be provided to better inform the public at large, including through social media and prime-time TV short advertising.

5.3. The EESC acknowledges the important role of the Pollinator Coalition of the Willing ⁽¹³⁾, an EU-led platform comprising member nations that are dedicated to exchanging knowledge and best practices, conducting research on preserving pollinators, and offering mutual assistance and cooperation.

5.4. The EESC calls for training programmes aimed at increasing knowledge on pollinator ecology, identification and habitat restoration for farm advisors, farmers, foresters, land managers, and landscape planners.

6. Final remarks

6.1. The Commission has prepared a prioritised list of 42 actions with clear set dates. For the proposed actions, it is appropriate to set out a detailed timetable for preparation and subsequent testing. A timetable established in this way will be both easier to control and easier to achieve for all participants.

6.2. The EESC believes that effective collaboration and appropriate allocation of resources will be crucial to ensure consistency among the different policy measures and instruments that impact the conservation of wild pollinators. The Committee emphasises the significance of matching funds to meet the expectations in the Commission communication.

⁽⁸⁾ Electromagnetic radiation of mobile telecommunication antennas affects the abundance and composition of wild pollinators.

⁽⁹⁾ SCHEER, Statement on emerging health and environmental issues (2018).

⁽¹⁰⁾ Risk to pollinators from anthropogenic electro-magnetic radiation (EMR).

⁽¹¹⁾ COM(2023) 35 final.

⁽¹²⁾ COM(2018) 395 final.

⁽¹³⁾ Coalition of the Willing on Pollinators, Promote Pollinators.

6.3. Improved safeguards are necessary to protect wild pollinators during both the pesticide risk assessment process and the usage phase of pesticides. Failing to adopt a daring strategy to tackle pesticide use puts the future of bees and other pollinators, our entire ecosystem, and the food security of EU residents in jeopardy. Greater transparency regarding the actual use of pesticides within the EU is necessary.

6.4. The Committee believes that the most effective approach and ideal solution is to achieve a worldwide agreement to decrease the use of synthetic pesticides, guaranteeing universal commitment and fair economic competition. Although this seems indeed like a long shot, a holistic approach is necessary and efforts in international negotiations must be intensified. This includes a serious discussion about an export-ban of pesticides to third countries, which are already banned for use in the EU.

Brussels, 13 July 2023.

The President
of the European Economic and Social Committee
Oliver RÖPKE
