

Call to ECHA stakeholder organisations for nominating stakeholder experts to ECHA's ad hoc stakeholder consultation group on pollinators guidance

1. Introduction

On 2 December 2019, the European Commission mandated ECHA to develop a guidance for assessing the risks to arthropod pollinators (including bees) from biocides exposure to ensure a high and harmonised level of protection of the environment, taking into account *EFSA's Guidance Document on the Risk Assessment of Plant Protection Products on Bees* (currently under review). In addition, ECHA is requested to specify the information required to enable a conclusion by the evaluating authority on whether products comply with the criteria under Article 19(1)(b)(iv) of the Biocidal Products Regulation concerning bees and other arthropod pollinators.

2. Scope of the mandate

Article 19(1)(b)(iv) of the Biocidal Products Regulation establishes that biocidal products, when used as authorised, must not generate unacceptable effects on the environment, particularly regarding the impact of the biocidal product on non-target organisms, which include bees and other pollinators.

The current version of the *Guidance on the Biocidal Products Regulation (Volume IV: Environment)* specifies that, at the moment, no method is available for biocides on how to perform the risk assessment for bees and other non-target arthropods and considers that the methods applied under the EU framework for plant protection products are not directly applicable.

However, if tests on bees or other non-target arthropods are available under the EU legal framework for plant protection products, the guidance states that a qualitative risk assessment should take place if the exposure pattern is comparable.

The guidance states that for neonicotinoid substances or other insecticides with high toxicity to bees, exposure should be quantified, however, if no data is available, a qualitative assessment should be performed.

Therefore, guidance needs to be generated to assess the risk to bees and other non-target arthropod pollinators from the use of biocides.

According to the mandate the following elements should be considered: `

- To develop a specific guidance to assess the risk to arthropod pollinators (including bees) from the use of biocides, ECHA must use any information already available, and in particular the past and current work of the European Food Safety Authority (EFSA) in this field.
- To ensure that all available information can be considered in the opinion, a targeted consultation of stakeholders should occur. For this consultation, if ECHA considers it appropriate, an overview of biocidal active substances and biocidal products to which arthropod pollinators could be exposed and may directly or indirectly trigger adverse effects in them could be prepared.
- The current references to the assessment of risk to arthropod pollinators included in the *ECHA Guidance on the Biocidal Products Regulation* must also be considered, along with work in this field already carried out by the competent authorities and scientific bodies from the EU Member States

3. Scientific process and stakeholder engagement

A scientific expert group composed of experts from Member States with specific scientific competence in risk assessment to bees, other arthropod pollinators and bee biology has been set up by ECHA.

The deliverables of the work as outlined in the mandate received by the Commission will be the responsibility of ECHA and its expert group. The Commission has asked ECHA to ensure stakeholders are consulted throughout the process.

ECHA has considered both the complexity of the subject and the stakeholder and public interest of the subject in question, and has decided to establish an ad hoc stakeholder consultation group composed of relevant organisations that will be consulted at various stages of the development of the pollinators guidance and provide input to ECHA's scientific group.

This call for expression of interests to stakeholder organisations is organised through the list of registered stakeholder organisations and is published on ECHA's website to allow registered as well as unregistered organisations to indicate their interest in becoming a member of ECHA's ad hoc stakeholder consultation group on pollinators guidance. The selection process will be organised by ECHA.

4. Role and composition of ECHA's ad hoc stakeholder consultation group on pollinators guidance

ECHA will be consulting the ad hoc stakeholder consultation group at key stages of the development of the pollinators guidance, and in particular:

- at the initial stage, by providing input to the ECHA scientific expert group on the specific guidance needs and available knowledge that can be used for developing the guidance;
- at the stage of a draft guidance document (expected in February 2021).

The ad hoc stakeholder consultation group may be also invited to provide input in an targeted consultation to be organised during the drafting of the guidance, if this is considered necessary by the ECHA scientific expert group.

Written comments from members of the ad hoc stakeholder consultation group will be considered by the ECHA scientific expert group. Considering the time constraints, no responses to individual comments will be made. No physical meetings of the ad hoc stakeholder consultation group are envisaged. Virtual meetings may be organised on an ad hoc basis.

5. Process for nominating ECHA stakeholder organisations for ECHA's ad hoc stakeholder consultation group on pollinators guidance

All organisations and individuals interested in or affected by the chemicals regulations are our stakeholders and are very welcome to participate in our work.

Additional information on ECHA's stakeholder engagement principles and involvement is available at:

<https://echa.europa.eu/about-us/partners-and-networks/stakeholders>

Organisations already registered as ECHA stakeholders can proceed directly with the nomination of the proposed members for the ad hoc stakeholders consultation group. A list of ECHA accredited stakeholders is available at:

<https://echa.europa.eu/about-us/partners-and-networks/stakeholders/echas-accredited-stakeholder-organisations>

Other organisations interested in nominating a member for the ad hoc stakeholder consultation group should also send a request to be registered as an ECHA stakeholder. Information and the link for submitting the request are available at:

<https://echa.europa.eu/about-us/partners-and-networks/stakeholders/how-to-become-an-accredited-stakeholder-organisation>

Nominations of members to the ad hoc stakeholder consultation group should be sent by email to: biocides@echa.europa.eu indicating the Subject: "Nomination for ECHA's ad hoc stakeholder consultation group for pollinators guidance" and submitting a completed nomination form (see Annex I of this document) as an attachment.

Organisations may submit nominations for up to three experts, however, no more than one expert per organisation will be selected by ECHA.

The deadline for submitting nominations is 26 March 2020, at midnight (Helsinki Time).

6. Process and criteria for selecting ECHA stakeholder representatives in ECHA's ad hoc stakeholder consultation group for pollinators guidance

ECHA will select a maximum of 16 stakeholder expert representatives from the nominations received through this call.

The selection will follow the principles established in ECHA's Stakeholder Engagement Approach that can be found at:

<https://echa.europa.eu/about-us/partners-and-networks/stakeholders/how-to-become-an-accredited-stakeholder-organisation>

For the selection, ECHA will consider the following principles:

- Interest in the field and expected benefits from the participation of the organisation as expressed in its application;
- Role and remit of the organisation at EU level;
- Achieving a balanced representation of stakeholder interests;

- Knowledge and expertise of the nominated stakeholder expert, considering the need for the ad hoc stakeholder consultation group to cover a range of technical and scientific areas, including environmental risk assessment, exposure assessment, bee and pollinators biology and ecology and bee and arthropod pollinators health.

After the selection, ECHA will inform all nominating organisations of the selected stakeholder experts, inviting non-selected organisations to contact those selected within their group and to contribute to the process through the selected organisations.

7. Roles and responsibilities of stakeholder experts selected as members of ECHA's ad hoc stakeholder consultation group on pollinators guidance

The selected stakeholder experts will be invited to comment on guidance needs and available information with regard to assessing risks to bees and other non-target arthropod pollinators from the use of biocides as well as on initial versions of/parts of the draft guidance document.

Members should respect the indications regarding the confidentiality of personal information and documents marked as restricted or confidential shared during the course of the guidance's development.

Personal information should be treated as confidential and will not be distributed. Restricted documents can be shared within the organisation if needed to prepare the comments but may not be further distributed or published. The names of the stakeholder experts and nominating organisations will be made publicly available.

8. Further information on the initiative, call for expression of interest or any other related matters

Please do not hesitate to contact ECHA at: biocides@echa.europa.eu for any questions you have or clarifications you need regarding this initiative and process to follow.

Please take note of the deadline for receiving the expressions of interest to contribute as a member or expert of ECHA's ad hoc stakeholder consultation group specified in Section 5 of this document.

Any application reaching ECHA after the set deadline will be deemed invalid.

ANNEX I. Expert nomination by ECHA stakeholder organisations for the ECHA's ad hoc stakeholder consultation group on pollinators guidance

Organisation name	
Main field of activity (please check "X" the applicable group)	<input type="checkbox"/> Animal welfare <input type="checkbox"/> Health & Safety <input type="checkbox"/> Industry <input type="checkbox"/> Consumers <input type="checkbox"/> Science & Technology <input type="checkbox"/> Environment <input type="checkbox"/> Trade union <input type="checkbox"/> Other (Please specify) <div style="border: 1px solid black; padding: 5px; width: fit-content;">e.g. beekeepers</div>
Contact details of the organisation Address	
Is the organisation listed in the register of ECHA stakeholders? https://echa.europa.eu/about-us/partners-and-networks/stakeholders/echas-accredited-stakeholder-organisations If not, please indicate the date of submission of your request to be registered	
Name of the main contact person representing the organisation (Title) First name/Surname Phone number Email address	
Short description of the organisation and its interest in the assessment of biocides (Max. 2 500 characters)	

Short description of the expected benefit that the organisation could bring to the development of a methodology to assess the risk to bees and other non-target arthropod pollinators from the use of biocides (Max. 2 500 characters)	
Name of the proposed expert (Title) First name/Surname	
Contact details of the proposed expert Address Phone number Email address	
Description and evidence of the expert's experience in the areas of the risk assessment of biocides or pesticides, in particular for bees (Max. 2 500 characters)	
Expert's publications of scientific articles in peer-reviewed journals or other scientific documents in the field in the field of the risk assessment of biocides or pesticides (Max. 2 500 characters or attach an annex listing the publications)	
Additional information demonstrating an adequate professional or scientific profile in this area (Max. 2 500 characters)	
Good level of knowledge of the English language	

Please duly fill in all the requested information and send the form by email to: biocides@echa.europa.eu.