

From: "Duijn, dr. ir. L.P. van (Luuk)"
Sent: Wed, 10 Feb 2016 19:38:09 +0200
To: "5.1.2.e ir. 5.1.2.e (5.1.2.e)" 5.1.2.e
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5.1.2.e 5.1.2.e >
Subject: Re: Thiacloprid MRL in honing

Beste 5.1.2.e

Kun je deze nota voor het College agenderen?

Luuk

Dr.ir. L.P. van Duijn
Secretaris/directeur Ctgb
College voor toelating van gewasbeschermingsmiddelen en biociden
Board for the authorisation of plant protection products and biocides

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Verstuurd vanaf mijn iPad

Op 5 feb. 2016 om 12:11 heeft 5.1.2.e ir. 5.1.2.e (5.1.2.e) <5.1.2.e@ctgb.nl> het volgende geschreven:

Beste collega's,

Bijgaand de notitie over thiacloprid in honing. Vanuit het oogpunt van consumentenveiligheid zie ik geen dringende aanleiding om de toelatingen van thiacloprid in Nederland te herzien, maar misschien gaat de publicatie van EFSA over het verhogen van MRLs van thiacloprid in honing wel vragen oproepen.

Groet,

5.1.2.e

Van: 5.1.2.e ir. 5.1.2.e
Verzonden: woensdag 3 februari 2016 13:54
Aan: 5.1.2.e dr. 5.1.2.e; Duijn, dr. ir. L.P. van (Luuk)
CC: 5.1.2.e dr. 5.1.2.e); 5.1.2.e 5.1.2.e; 5.1.2.e 5.1.2.e 5.1.2.e; 5.1.2.e ir. 5.1.2.e
Onderwerp: tijdschrijven: FW: thiacloprid MRL in honing

Hallo 5.1.2.e en Luuk,

5.1.2.e heeft gekeken naar het signaal van Bayer. De MRL is verlaagd, nu blijkt op basis van Duitse info dat als gevolg van gebruik in koolzaad de MRL van thiacloprid in honing hoger zou moeten zijn. De verwachting is dat het zeker 6 maanden duurt voordat de MRL wordt bijgesteld. Ook in Nederland zijn er koolzaad toepassingen. Dat lijkt geen veiligheidsrisico te geven, maar natuurlijk wel het risico dat bij metingen in honing de MRL wordt overschreden. De combinatie- thiacloprid, honing en overschrijding MRL- gaat vragen oproepen.

Ik heb 5.1.2.e gevraagd dit netjes op te schrijven. Zullen we naar aanleiding daarvan in overleg overheid bespreken hoe we met dit signaal omgaan.

Buiten reikwijdte verzoek

Groeten, 5.1.2.e

Van: 5.1.2.e ir. 5.1.2.e
Verzonden: dinsdag 2 februari 2016 19:38
Aan: 5.1.2.e ir. 5.1.2.e (5.1.2.e)
Onderwerp: FW: thiacloprid MRL in honing

Hallo 5.1.2.e

Graag jouw advies. Is onderstaande bericht aanleiding om nog eens te kijken naar de toelatingen van thiacloprid? Ik neem aan de MRL verlaging een Europees besluit is? En dat het Ctgb's reguliere werkwijze is om de huidige toelatingen in lijn te brengen met de Europese besluiten, waaronder besluiten van MRL's (– onder onderhoud toelatingen)? Is er reden om hier speciale aandacht aan te geven?

Groeten, 5.1.2.e

Van: 5.1.2.e 5.1.2.e [5.1.2.e n@bayer.com]
Verzonden: maandag 1 februari 2016 15:42
Aan: 5.1.2.e ir. 5.1.2.e; 5.1.2.e dr. 5.1.2.e
CC: 5.1.2.e 5.1.2.e 5.1.2.e 5.1.2.e (5.1.2.e); 5.1.2.e 5.1.2.e
Onderwerp: thiacloprid MRL in honing

Beste 5.1.2.e 5.1.2.e

Ik heb vanuit ons hoofdkantoor een communicatie ontvangen over de verlaging van de MRL in honing voor thiacloprid van 0,2 mg/kg naar 0,05 mg/kg.

Ik verwacht niet dat er een probleem is in Nederland, heb voor de zekerheid ook de data van 5.1.2.e 5.1.2.e 5.1.2.e bekeken
(http://www.beemonitoring.org/Downloads/ObservationeleStudieWintersterfteHoningbijvolken_Nederlandse_Vertaling.pdf). Hieruit blijkt dat er 80 monsters zijn genomen van honing. In 8 monsters werd thiacloprid teruggevonden boven de LOD van 0.8 µg/kg en in 13 monsters werd een waarde boven de LOQ van 1.0 µg/kg gevonden (variërend tussen 1.4 en 15 µg/kg).

Echter vanuit zorgvuldigheidsoverwegingen treffen jullie hierbij de algemene berichtgeving van ons hoofdkantoor aan:

"In July 2015, the Regulation (EU) 2015/1200 amending the existing EU maximum residue levels (MRLs) for thiacloprid was published.^[1] In this Regulation, the EU MRL for thiacloprid in honey was set at 0,05 mg/kg. This new MRL shall apply for honey produced as of 12 February 2016.

Previously, the EU MRL for thiacloprid in honey was set at 0,2 mg/kg based on monitoring data from Germany. Throughout the whole MRL review process there was no indication of a modification of this value. Bayer is disappointed to learn that the company and beekeepers are confronted with this change out of the blue and with lack of scientific evidence. The company is clearly missing transparency and involvement of the registration holder in the process.

On enquiry, Bayer has been informed by the EU COM that the German Federal Office of Consumer Protection and Food Safety (BVL) reacted shortly after the proposal was voted asking to set the MRL for honey back at 0,2 mg/kg based on the existing uses on rapeseed. The European Food Safety Authority (EFSA) is requested to draft a reasoned opinion on the matter. EFSA replied to the mandate stating that they would need 6 months to perform the assessment. The reasoned opinion should be published somewhere in the beginning of 2016 and discussed at the next Standing Committees.

We are watching the further development closely and hope that the thiacloprid MRL in honey will be raised back in the second half of the year 2016.

The biggest input of thiacloprid residues into honey is estimated to evolve from application of thiacloprid products on oilseed rape during the flowering period of the crop. Currently the company cannot exclude that application of thiacloprid products on oilseed rape during flowering in accordance with label instructions may lead to exceedance of the new MRL of 0,05 mg/kg in honey in some countries, depending on the specific conditions in such countries. This is of course unacceptable for us and we will pro-actively contact stakeholders to discuss potential solutions to comply with the new MRL. However, Bayer fears that this new EU MRL for thiacloprid in honey may further impact farming communities particularly in oilseed rape. These already have been seriously impacted by the damages due to pest and diseases following the restriction of crop protection products belonging to another subgroup of the neonicotinoid family.

For honey which was produced by 11 February 2016, the old MRL of 0,2 mg/kg will apply. Meaning these honey samples can still be placed on the market. Bayer is convinced that this original MRL is safe to consumers and these honey samples can be sold from an ethical point of view without any concern.

We at Bayer will make all reasonable efforts in order to re-establish the original honey MRL. Especially taking into account that thiacloprid has been considered by authorities including EFSA^[2] as having a favorable environmental profile, including a very low intrinsic toxicity to bees.

Bayer is planning to inform the beekeepers in a transparent way on the matter in due course in the concerned European countries. In addition, Bayer is working on recommendations to the oilseed rape community.

We will constantly update you on further developments. Should you need further information before this time, please do not hesitate to contact me. We look forward to working in close cooperation with you on this matter in the future."

^[1] <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R1200&from=EN>

² EFSA believes it is unlikely for thiacloprid and acetamiprid to pose a risk to bees. EFSA acknowledged that thiacloprid and acetamiprid have a lower toxicity than thiamethoxam, imidacloprid and clothianidin.

http://ec.europa.eu/food/plant/standing_committees/sc_phytopharmaceuticals/docs/sum_1516072013_en.pdf

Mochten er vragen zijn, kan er altijd contact met me opgenomen worden.

Met vriendelijke groet / Best regards,

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<image001.png>

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^[1] <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R1200&from=EN>

^[2] EFSA believes it is unlikely for thiacloprid and acetamiprid to pose a risk to bees. EFSA acknowledged that thiacloprid and acetamiprid have a lower toxicity than thiamethoxam, imidacloprid and clothianidin.

http://ec.europa.eu/food/plant/standing_committees/sc_phytopharmaceuticals/docs/sum_1516072013_en.pdf

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