European Beekeeping Association

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Brdo pri Lukovici, 17. December 2025

Subject: The position of the European Beekeeping Association (EBA) regarding the vote on the MRL of pesticides (acetamiprid) in the European Parliament

Dear President of the European Parliament, Ms Roberta Metsola,

Dear Members of the European Parliament,

Regarding the proposed changes to the maximum residue limits (MRLs) of pesticides, which envisage, amongst others, raising the MRL of acetamiprid and its metabolites in honey to 1 mg/kg, the European Beekeeping Association and its Scientific Committees on Bee Health and Safety and Quality of Bee Products strongly express their opposition.

While the European Food Safety Authority (EFSA) has concluded that the proposed MRL is unlikely to pose a risk to human consumers, this assessment does not adequately address the chronic, sublethal, and colony-level effects of acetamiprid on honey bees (*Apis mellifera*). Scientific evidence demonstrates that acetamiprid, even at sublethal doses, poses a severe threat to honeybees. Exposure disrupts their energy metabolism and endocrine regulation, critically impairing the homing ability and return to the hive of foragers (You et al., 2026). These neurotoxic effects are exacerbated by the disruption of neurological redox equilibrium (Mackei et al., 2024) and alterations in the fatty acid composition of the central nervous system (Huber et al., 2025), which damages their basic functionality. Furthermore, the insecticide induces immunological and hormonal disorders, suppresses pathways linked to juvenile hormone synthesis in queens, and affects signaling in emerging bees (Erban et al., 2024), while also impairing behavior, survival, and larval development (Shi et al., 2025; Barroso et al., 2025). Its synergistic interaction with other pesticides, pathogens such as *Nosema ceranae* and the *Varroa destructor* mite (Wang et al., 2025; Kang et al., 2024), and the alteration of gut (Han et al., 2023) and cuticular microbiomes (Reiß et al., 2023), multiplies its negative impact, holistically weakening colonies. Given this accumulation of sublethal and chronic risks that compromise individual and colony health, it is imperative to prohibit the use of acetamiprid on pollinator-attractive crops. This measure is crucial to prevent bioaccumulation within the hive, protect the integrity of the trophic chain, and safeguard pollination ecosystem services, given evidence that there is no safe level of exposure for bees.

Therefore, we suggest NOT to increase the maximum residue limit of acetamiprid in honey. A "natural", found-in-plants acetamiprid does not exist, and MRLs reflect post-treatment residues of synthetic pesticides in bee products. Only in this way can we ensure the safety of bees, the preservation of their populations and the safety and quality of European honey and other bee

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products. The European Beekeeping Association strives for sustainable beekeeping practices that exclude the use of neonicotinoids, as these pose one of the greatest threats to bee colonies.

We respectfully request that your vote reflects the position of more than 420,000 European beekeepers represented by the European Beekeeping Association, who are actively working to protect bees and preserve Europe's biodiversity.

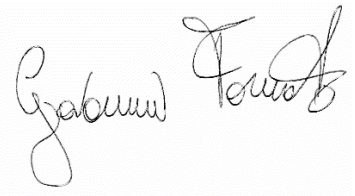
We remain at your disposal for scientific consultation and constructive dialogue.

Respectfully,

President Boštjan Noc – President of European Beekeeping Association

Prof. Dr. Aslı Özkırım – President of EBA Bee Health Scientific Committee

Dr. Giovanni Formato – Vice-President of EBA Bee Health Scientific Committee



Dr. Nik Lupše –Head of EBA Scientific Committees, on behalf of the Scientific Committee for Safety and Quality of Bee Products

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