

# Contributions of ECPA (industry) to the revision of the EFSA Guidance Document on birds and mammals

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## The revision is a long process with open timelines

- EFSA started the revision of the Guidance Document (GD) on birds & mammals<sup>a</sup> in 2015, with two main official activities since: a) **data collection** of birds/mammals ecological information and residues<sup>b</sup> and b) **Working Group** in charge of technical content of the revision
- EFSA has recently (2019) issued a Scientific Statement<sup>c</sup> indicating that the **risk assessment for bats** needs specific attention, as this taxonomic group is not covered by the current EFSA guidance.
- The content and timelines for the revision is not defined yet, so it's **still good time to enhanced discussions and data sharing** with EFSA.

## Industry is pro-actively contributing with data & publications

- ECPA companies identified earlier several areas requiring further **data** and interpretation of the GD. The first **publications** were already done in 2014 (bird focal species and voles).
- ECPA has made other **publications, posters & conference's contributions**, very targeted, highlighting main topics for revision.
- Industry was the major contributor to the **Data Collection tender by EFSA<sup>b</sup>**, providing more than 700 confidential reports.
- Industry has **provided data directly to EFSA** on mammalian endpoints, residues, exposure calculator and mistakes in the current GD.
- ECPA was the major contributor to the **Public Commenting** period for this revision<sup>d</sup>

Bird focal species<sup>1</sup>

Common vole<sup>2</sup>

Multi-day radio-tracking PT<sup>3</sup>

Residue decline foliage<sup>4</sup>

Initial residues fruits<sup>6</sup>

Mammals bodyweight exposure duration<sup>5</sup>

Mammals LD50<sup>6</sup>

## Risk to bats as new area requiring data and identification of priority areas

- The EFSA Scientific Statement is a **first step addressing risk to bats** from pesticides. But, it's far from being a document for regulatory use.
- ECPA is evaluating the EFSA Statement and initiated work to **identify priority areas to address**: relevant species and scenarios (exposure patterns, crops, habitats, timing of exposure,...).

## Feedback from EFSA and advice on working priorities

- **Feedback from EFSA** to data provided by industry has been **limited**
- **Enhanced communication** between EFSA, industry and other stakeholders would facilitate identification of **working priorities and targeted and efficient use of limited resources**

### References of EFSA documents

<sup>a</sup>EFSA (2009) *EFSA Journal* 7(12):1438. <sup>b</sup>EFSA (2019) *EFSA Journal* 17(7):5758. <sup>c</sup>Lahr et al. (2018) EFSA supporting publication 2018:EN-1513. <sup>d</sup>EFSA (2020) EFSA supporting Publication 2020:EN-1786 (2020)

### References of industry publications

<sup>1</sup>Dietzen et al. (2014) *Integr Environ Assess Manag* 10:247-259. <sup>2</sup>Jacob et al. (2014) *Pest Manag Sci* 70:869-878. <sup>3</sup>Ludwigs et al. (2016) *Environ Tox Chem* 36:1270-1277. <sup>4</sup>Ebeling & Wang (2018) *Environ Tox Chem* 37:1926-1932. <sup>5</sup>Wang et al. (2019). *Environ Sci Eur* 31, <https://doi.org/10.1186/s12302-019-0221-1>. <sup>6</sup>In preparation