



MARIOLOPOULOS - KANAGINIS FOUNDATION
FOR THE ENVIRONMENTAL SCIENCES

INTERNATIONAL CONFERENCE

Science and policy in times of multicrisis and dissent: Issues of framing, authority, evidence
– and political-economic power

15-17 May 2025, Athens and online

Abstract

Ignorant by design: Regulatory science, comitology and the agrochemical industry

By Dr Barbara Berardi Tadié
Director of Research and Advocacy, Pollinis, France

This paper considers the agrochemical industry's strategies in shaping regulatory science. It presents preliminary results of an ethnographic research on the production and validation of guidance documents to assess the risk of pesticides on pollinators in the EU.

The pesticide registration process is based on a combination of regulations (hard law) and administrative and technical directives (soft law). Among the latter, regulatory science procedures, set out in guidance documents detailing the scientific and methodological criteria for the test protocols used to assess risk, represent a key element. However, some of these guidance documents, which are crucial to appraise the hazards of a pesticide, have not been updated, approved or even produced at all.

In particular, I look at the case history of the Bee Guidance Document, published by EFSA in 2013 but never adopted at European level due to the lack of approval by the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF), a crucial but little-known component of the EU decision-making chain.

My analysis focuses on the industry's role in deconstructing the scientific and political consensus around this document, which has led to the stalling of its adoption by SCoPAFF for ten years. Through the case study of the EFSA Bee Guidance Document, it reveals certain mechanisms through which the industry attempts to maintain its hegemony over pesticide risk assessment and, more generally, over the epistemic form of regulatory science in the EU system.