

## BRIEF FOR CSA'S MEETING WITH PAN UK: 10 OCTOBER

### A. Handling

You are due to meet Dr Keith Tyrell (Director) and Dr Stephanie Williamson (Chief Scientist) from PAN UK. They have requested this opportunity to present their views on the effect of neonicotinoids on bees and other pollinators. The request was originally put to Bob Watson via PAN North America at end of June but has taken a little while to set up following his August holiday and subsequent departure from Defra.

The meeting has been requested by PAN and the Government has recently stated its current position (the full text of this statement made on 18 September is Annexed below). It is therefore suggested that this meeting should primarily be an opportunity to hear PAN UK's views and to demonstrate our commitment to getting our approach right in this area.

### B.



### C. PAN UK and neonicotinoids

PAN UK has been involved in lobbying on this issue for a while and Dr Tyrell sent a letter to the Secretary of State on behalf of 14 NGOs in April. More recently, they have been seeking to persuade the supermarkets to back their call for an independent review of neonicotinoids. Co-op and Marks and Spencer have written to Ministers on this. Alongside this, they have launched a set of factsheets which set out their case but also present some of the facts in a reasonably even-handed way.

The centrepiece of their campaign is the following "12 point call for action on bee-toxic pesticides":

#### *UK government:*

1. Immediate and urgent independent review of the latest science and the May 2012 conclusions of the European Food Safety Authority (EFSA) on the flawed risk assessment of neonicotinoids currently on the market.
2. Moratorium on UK approvals and use of neonicotinoids in agricultural, ornamental and amateur garden sectors until proven not to be causing harm to pollinators.

3. Commit to and support Friends of the Earth's call for a National Bee Action Plan.

4. Build more options into entry-level agri-environment schemes to encourage farmers to adopt more Integrated Pest Management (IPM) methods, especially biological control, which will reduce the tendency for 'insurance' pesticide treatments.

*Food and farming sector:*

5. Food retailers to put neonicotinoids onto pesticide restricted lists within their own company standards and plan how to phase in safer, IPM and organic strategies while phasing out neonicotinoids across their global supply chains.

6. Practical research with farmers on IPM and organic strategies for replacing neonicotinoids, with a focus on oilseed rape, fruit and vegetable uses.

7. Training and advice for farmers and crop consultants on effective IPM strategies based on agroecology and smarter cropping system design.

8. Collaboration between farming, retail, research and advisory, government agencies, beekeeping and civil society organisations to reduce reliance on pesticides and phase in ecologically-based approaches.

*Ornamentals and amenity sector:*

9. Ornamentals and garden supply sector to end the use of neonicotinoid treatments on pot plants.

10. Parks, local authorities and other amenity users of neonicotinoids to phase out use and replace with IPM and organic strategies.

*Amateur gardening sector*

11. Immediate suspension of sales to the public of garden products that contain neonicotinoids.

12. Offer gardeners alternative organic products and advice for managing insect pests.

D. PAN UK response to Defra statement on neonicotinoids (from PAN UK website)

"PAN UK is incredibly disappointed with the response from Defra regarding the use of bee toxic pesticides and the effects they are having on the UK's bees and other pollinators. Defra has once again shown that when it comes to protecting the environment or protecting the profits of the pesticide industry the pesticide industry wins hands down!

"In a statement

(<http://www.defra.gov.uk/environment/quality/chemicals/pesticides/insecticides->

[bees/](#)) Defra announced that following an internal review - carried out largely by its own staff and related bodies - there is no need to change the approach to using bee toxic neonicotinoids in the UK and that we should carry with business as usual.

“With this decision, Defra is burying its head in the sand and ignoring the overwhelming body of scientific evidence. Other European countries that have implemented bans on neonicotinoids are seeing their bee populations recover.

“This outcome is the exact reason that PAN UK and the Coop are calling for an [INDEPENDENT](#) review of the science that underpins the risk assessment for neonicotinoids in the UK. In our opinion Defra is far too close to industry to allow for a completely unbiased opinion on the science that it has been reviewing. Some 60% of the funding for Defra’s pesticide regulatory and approvals branch comes from the work that they do for industry. There is no question that the pesticide industry lobby is a very powerful voice in Whitehall.

“We urge our supporters to write to their MPs and to the Minister directly demanding an independent review.”

E. Brief response to points raised in the PAN UK call for action and response to the Defra statement

1. *Independent review of the science and the EFSA conclusions on the flawed risk assessment of neonicotinoids*

The previous CSA – who himself had an independent challenge role within Defra, as do I – set up a process for the evidence to be reviewed by independent experts. In particular advice was taken from the independent Advisory Committee on Pesticides and we took full account of EFSA’s work.

We fully agree that the risk assessment should be updated and should explicitly include pollinators other than honey bees. But the regulatory studies underpinning current approvals fully meet the existing requirements and provide important information on the impacts of neonicotinoids.

2. *Moratorium on UK approvals and use of neonicotinoids until proven not to be causing harm to pollinators.*

The view of our expert advisers is that the evidence as a whole does not currently justify such a step. It is hard to see how it would be possible to prove that a class of insecticides does not cause harm to insect pollinators.

It is sometimes suggested that applying the precautionary principle would support a ban in the current situation. We fully agree that full scientific certainty is unlikely in the case of such a complex issue and that action might need to be taken in the absence of certainty. However, the current evidence does not, in our view, justify this step.

Commission Communication (2000)1 of 2 February 2000 outlines the European Commission’s approach to using the precautionary principle and establishes

guidelines for applying it. These guidelines recognise that one way of applying the precautionary principle is through the Community rules for prior approval of certain products, such as pesticides, before they are placed on the market. .

3. *Commit to Friends of the Earth's call for a National Bee Action Plan.*

We are considering whether further actions need to be taken to protect bees and other pollinators. The issues of relevance here are, of course, much wider than pesticides alone, and it is vital that decisions are made on the basis of a clear evidence base.

4. *Encourage adoption of Integrated Pest Management (IPM), especially biological control, to reduce 'insurance' pesticide treatments.*

[PAN argues that much of the current use of neonicotinoids is unnecessary. In particular, PAN suggest that the use of treated seed is prophylactic because the seed is treated well before it can be known where insect pressures will occur.]

The EU Directive on the sustainable use of pesticides requires Member States to promote low pesticide-input pest management, including IPM and organic farming. Member States must ensure that professional users have information and tools for pest monitoring and decision making, as well as advisory services on IPM. They must also establish incentives to encourage professional users to implement crop or sector-specific guidelines for IPM. The Directive requires Member States to describe in National Action Plans how they will ensure that all professional users implement IPM principles by 1 January 2014. An interim report is required by 30 June 2013.

In the UK most agricultural crops are produced under farm assurance scheme crop protocols, which include relevant IPM approaches. Other sectors of pesticide use in the UK such as use of pesticides in amenity situations (parks, public spaces, sports grounds, highways, rail etc) have more variability in IPM approaches. The draft UK National Action Plan is currently out to public consultation and reflects this. Further development of approaches for IPM will be taken forward through the Pesticides Forum and so PAN UK will have the chance to contribute. If they have specific ideas on the development of IPM in the UK schemes, these would be welcome.

5. *Bee populations have recovered where neonicotinoid insecticides have been restricted*

[PAN has suggested that there is strong evidence from Italy that the restrictions applied there have had real benefits for bees. Italy have established the APENET system, which was recently reviewed by EFSA]

Restrictions on neonicotinoids in other EU countries should provide a good opportunity to study the results for bees and pollinators. However, information seems to be slight. Any further intelligence PAN have would be very welcome.

Italy has collected information through the APENET monitoring and research project. This was reviewed by EFSA who concluded that there were deficiencies in the study designs, weakness in the statistical analysis and incompleteness in the reporting of

results. It was therefore not possible to draw a definitive conclusion. However, potential concerns were identified (including effects from dust exposure, sub-lethal effects and interactions with pathogens). These are being carried forward into the updating of the risk assessment for bees.

6. *Defra is too close to industry on this issue*

Industry fund much of the regulatory work on pesticides, carried out on Defra's behalf by HSE. This policy is in place because it is considered right that the costs of regulation should fall in this way rather than on the taxpayer. The money does not bring influence.

Defra continues to believe that regulation to protect people and the environment is needed for pesticides. We are making considerable efforts at present to tackle disproportionate or ineffective regulation – in common with all parts of Government. But this comes second to the need to reduce risks to the health of people and to the wider environment.

## Annex

### **Defra statement of position (made on 18 September in response to Parliamentary Question from Caroline Lucas)**

The Government takes very seriously any threat to bees, which are important in their own right and as key pollinators. We have therefore kept the evidence on neonicotinoids under close and open-minded scrutiny and have made it clear that we are prepared to take whatever action is necessary. This action could include restricting or withdrawing the approved uses of neonicotinoids.

New research was published earlier this year, suggesting that low doses of neonicotinoids could have sub-lethal effects on bees with consequences for bee populations. We arranged for this to be assessed alongside the existing evidence. The assessment was carried out by experts from: the Chemicals Regulation Directorate of HSE; Defra's Food and Environment Research Agency; Defra's Science Advisory Council; and the independent Advisory Committee on Pesticides. A document summarising the evidence and the experts' assessment will be placed on the Defra website very shortly.

Defra's Chief Scientific Adviser has considered the expert assessments – alongside parallel work by the European Food Safety Authority – and has advised that:

- Some of the studies, including those by Whitehorn *et al* and Henry *et al*, provide evidence of sub-lethal effects of neonicotinoids in the conditions applied in the research.
- However, none of the studies gives unequivocal evidence that sub-lethal effects with serious implications for colonies are likely to arise from current uses of neonicotinoids.
- Existing studies submitted in support of the current regulatory approvals fully meet current requirements. They do not explicitly address all of the sub-lethal effects suggested by the academic research. However, they do cover a wide range of important outcomes and, in these studies, hives exposed to treated crops did not show any gross effects when compared to control hives exposed to untreated crops.

Based on these findings, the Government has concluded that:

- It is appropriate to update the process for assessing the risks of pesticides to bees in the light of developments in the science - including the latest research. This exercise should include the development of a new risk assessment for bumble bees and solitary bees, alongside an updated risk assessment for honey bees. This work is being taken forward in Europe and UK experts are active in this. The aim is to complete this highly complex task by the end of 2012.

- Further research will be carried out to fill identified evidence gaps, including the questions raised about the relevance of the recent studies to field conditions. The Government has already put new research in place to explore further the impacts of neonicotinoids on bumble bees in field conditions and to understand what levels of pesticide residues and disease in bees are normal.
- The recent studies do not justify changing existing regulation. However, the research that we have put in hand and the on-going work in Europe to develop the risk assessment could change the picture and it is always possible that further new evidence may emerge. As our knowledge develops, we will continue to consider the need for further research and for any changes to the regulation of neonicotinoids.

We are currently considering wider policies on bees and other pollinators and will set out our position shortly.