

Thank you for your letter of 19 April. I apologise that it has taken me some time to respond.

You asked about the scope of our work to look at the recent evidence and the process for this. The exercise includes the three studies I mentioned in speaking to the Independent, but is not limited to these. We will look in particular at studies that have emerged since our last examination of the evidence last Summer.

I want this work to be taken forward in a manner that is effective but also as rapid as possible. I am therefore overseeing the examination of the recent studies by the Chemicals Regulation Directorate of HSE, the bee experts in Defra's Food and Environment Research Agency and the independent Advisory Committee on Pesticides. We will also take account of the recent Statement by the European Food Safety Authority (EFSA). Although you will appreciate that it is not possible to predict with total confidence when we will have completed our work, our aim is to do so before the end of July.

There are two other points you raise in your letter which I should like to address. First, I fully recognise that the issues that have been raised are not just about honey bees but are relevant to a broader range of bees and pollinator species. We are considering the research in that wider context. As the regulatory risk assessment for pesticides focuses on honey bees and two other non-target arthropod species, we have less baseline knowledge of the effects of all pesticides, not just neonicotinoids, on pollinator species other than honeybees. We also have a less developed basis for interpreting the available evidence. I am pleased that EFSA have picked up on the importance of broadening the risk assessment process for bees beyond honey bees.

Second, you mention the precautionary principle on which we have corresponded before. I agree – and the Government agrees - that the principle should be applied to guide decision-making when the evidence is inconclusive. However, it is important to be clear what this means. The precautionary principle is normally taken from the text of the Rio Declaration “Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”

One way in which the EU applies the precautionary principle is through the Community rules for prior approval of certain products, such as pesticides, before they are placed on the market. Restrictions under these rules on pesticide use – addressing possible but not certain risks – apply the precautionary principle. However the precautionary principle is not a justification for precipitate or disproportionate action or for ignoring the facts. It would not be precautionary to ban neonicotinoids before we have properly considered the latest studies and by making selective use of the evidence.

I am pleased to hear that arrangements have been made for [REDACTED] to visit CRD and examine key regulatory studies underpinning the current approvals of neonicotinoids on behalf of Buglife. Anything that can be done to ensure

that all those engaged in this debate have access to the same information can only be helpful.