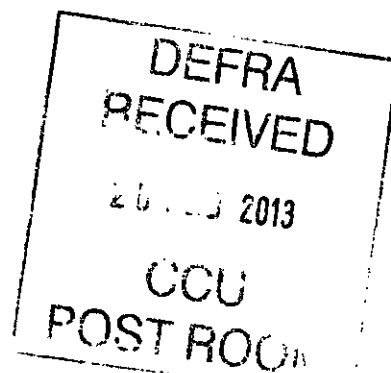


Rt. Hon. Owen Paterson MP, Secretary of State  
Defra  
Nobel House  
17 Smith Square  
London SW1P 3JR



20 February 2013

Dear Mr Paterson

**European Commission proposals to restrict neonicotinoid use**

We urge you to support the European Commission's proposed restrictions on neonicotinoid use in the Standing Committee vote on 25<sup>th</sup> February. Please see the enclosed briefing for further detail on the points we highlight below.

Evidence continues to grow that use of neonicotinoids can pose a risk to pollinating insects. As you know, the European Food Safety Authority (EFSA) recently published a scientific review of the evidence in which they identified some high acute risks to honeybees, and highlighted critical data gaps that prevented a full risk assessment for other exposure routes and other insect species.

The Commission's proposed restrictions are a proportionate response to the identified risks and uncertainties, in line with the precautionary principle. Bees and other pollinating insects play a vital role in food production as well as being an integral part of natural ecosystems and wonderful creatures in their own right. The costs (economic and otherwise) of losing them would far outweigh the costs of altering farming to avoid the most risky uses of neonicotinoids.

We recognise the concerns expressed by some farming organisations about the possible impacts on farmers of the proposed restrictions. However we do not believe these concerns are reasons for inaction. Instead we call on government and industry to work with farmers to help them make the vital transition away from neonicotinoids to more sustainable means of pest control, including promoting uptake of the less harmful alternatives to neonicotinoids that already exist. An integrated pest management approach is absolutely necessary to overcome the growing problem of pesticide resistance (including resistance to neonicotinoids) that farmers are now grappling with, and to address the wider environmental problems caused by pesticide use.

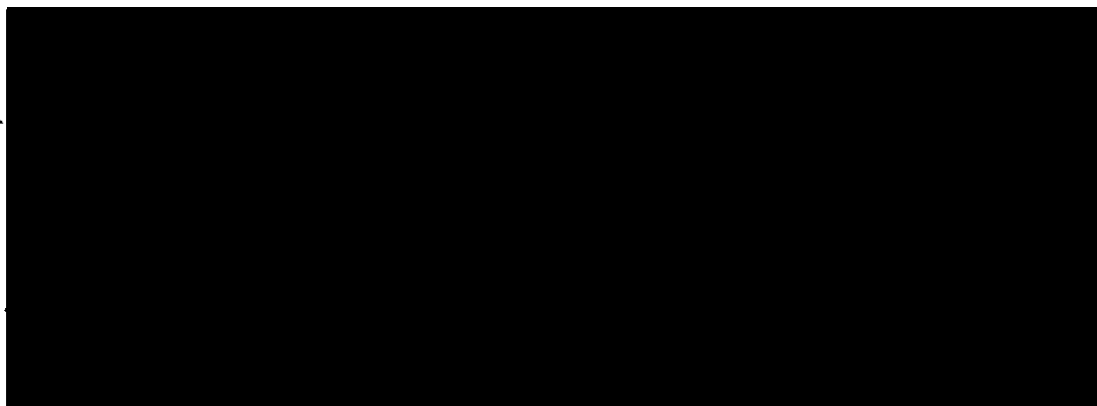
Blocking the Commission's proposed restrictions would buy perhaps a few years more for farmers to continue using these products until they are rendered ineffective by resistant pest populations, or until further evidence emerges of their harmful effects that convinces Europe to act. In this time, the damage to our biodiversity, and the loss of pollination services to farmers, would continue. We suggest that this would not be a responsible course of action and it would

provide no solution to the rising tide of evidence and opinion against the current uses of neonicotinoids. We understand that the problem of bees is more than just about pesticides and neonicotinoids. Should there be a restriction on the three neonicotinoids reviewed by EFSA we believe this is the chance to start acting on all causes of bee decline.

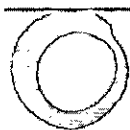
We urge you to support the Commission's proposals as a first step, and to take this opportunity to support farmers in a real transition to more environmentally and economically sustainable pest management.

Yours sincerely

Chief Executive



Director of Policy and Campaigns



friends of  
the earth



Director of Conservation

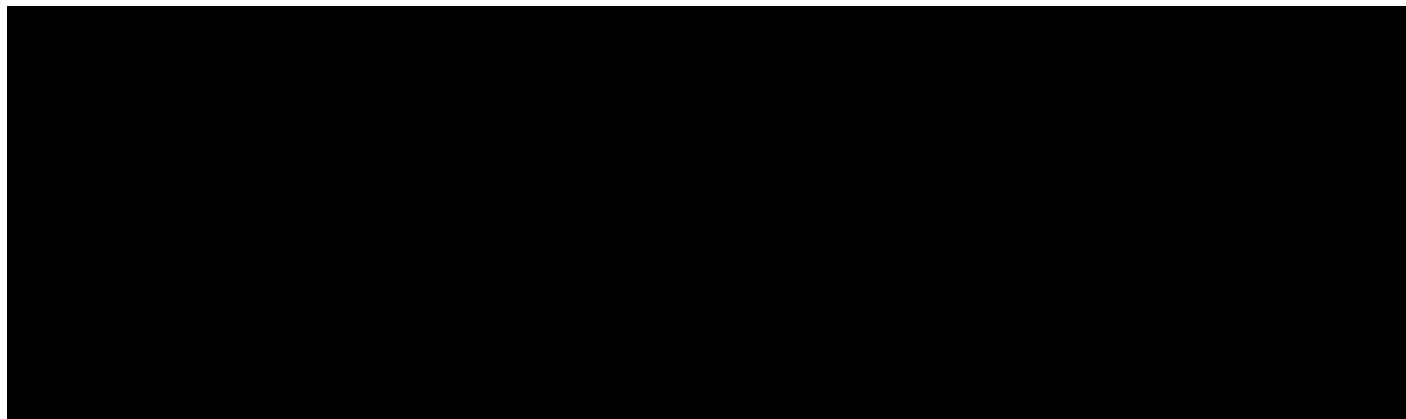


a million  
voices for  
nature

Policy Director



**Soil Association**  
healthy soil. healthy people. healthy planet



Enc. neonicotinoids briefing

## European Commission proposals to restrict neonicotinoid use – background briefing

### EFSA report

The European Food Safety Authority (EFSA) in January 2013 published an independent scientific review of the research on clothianidin, imidacloprid and thiamethoxam. This report identified acute risks to honeybees from some uses of neonicotinoids. These risks are noted in EFSA's press release of 16<sup>th</sup> January and are furthermore spelled out in the report itself. We are concerned by the Government's comments implying this is not the case, most recently in David Heath MP's written reply to a PQ by Adrian Sanders MP.

The EFSA press release states:

- 'only uses on crops not attractive to honey bees were considered acceptable' to exposure to pollen and nectar;
- 'A risk to honey bees was indicated or could not be excluded...' for risks from exposure to dust from seed coatings;
- There is 'an acute effect on honey bees' from guttation; and,
- 'Given the importance of bees in the ecosystem and the food chain and given the multiple services they provide to humans, their protection is essential.'

This is supported by EFSA's conclusions in its reports on each active ingredient:

- Imidacloprid: 'A high acute risk to honey bees was identified from exposure via dust drift for the authorised uses in cereal, cotton, maize and oilseed rape. A high acute risk was also identified for exposure via residues in nectar and /or pollen for the authorised uses in cotton, oilseed rape and sunflowers.' (page 34, paragraph 8.2)
- Thiamethoxam: as in the first sentence above but with the addition of sunflowers. Second sentence: 'A high acute risk was also identified for exposure via guttation fluid for the authorised uses in maize.' (page 45, paragraph 6.1)
- Clothianidin: as in the first sentence above with the exception of cotton; the same assessment was made as with the second sentence above with the exclusion of cotton and sunflowers. (page 37, paragraph 7.2)

### Application of the precautionary principle

Regulation (EC) No 1107/2009 concerning the placing of plant protection products on the market states under article 1 (4): "*Member States shall not be prevented from applying the precautionary principle where there is scientific uncertainty as to the risks with regard to human or animal health or the environment posed by the plant protection products to be authorised in their territory*". The EFSA report, as well as concluding that there is a high risk for honeybees, highlights significant scientific uncertainty for wild pollinators.

There have been over 30 credible scientific studies into the effects of neonicotinoids since 2009 that show a far greater concern for the potential environmental impact of their usage than is indicated by the risk assessment (94% of all the credible studies undertaken).

### **Economic value of pollinators**

Pollination is estimated to be worth £510 million per annum to UK agriculture. 90% of all pollination is by wild pollinators. If the use of neonicotinoids reduces pollination by just 5%, the net result of their use will be economic loss.

### **Possible environmental and agronomic impacts of the proposed restrictions**

Some farming organisations and others have raised concerns that, if the proposed restrictions were implemented, the impacts on farmer profits and yields would be severe. A further concern is that, if safer alternatives are not made available quickly, some farmers may use older products which could result in other harmful environmental impacts.

In the short term, older chemicals that remain on the market could provide an alternative for farmers. There have been no studies that we are aware of directly comparing the impacts of such alternatives (such as pyrethroids) with neonicotinoids. However, on balance of evidence it seems likely that the risks to pollinators from systemic pesticides outweigh the risks from increased use of these older chemicals, especially if they are used according to best practice.

Furthermore, less environmentally damaging alternatives already exist. The potential for new and innovative products to directly replace neonicotinoids was recognised by Defra in its written evidence to the Environmental Audit Committee. These include new biopesticides and technological approaches such as more accurate pest monitoring and pesticide targeting. Such products and techniques need to be made more widely available to farmers. In addition, changes to farming practices such as more diverse crop rotations, encouraging natural enemies of pests and using resistant crop varieties would help reduce reliance on all insecticides.

An integrated pest management approach, that does not rely on a single group of chemicals to deliver effective pest control, is absolutely necessary to overcome the growing problem of pesticide resistance that farmers are now grappling with. Resistance to neonicotinoids is already emerging, as noted by Defra in its written evidence to the Environmental Audit Committee (paragraph 88).