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Dear Owen

Neonicotinoids

Thank you and your colleagues again for all the work you have done in recent months in trying to secure a sensible evidence-based outcome to the Commission's commitment to take action in the area of bees and neonicotinoids.

We would now like the Government to help ensure that the Chemicals Regulation Directorate (CRD) implements the regulation (EU) No 485/2013 in a light-touch way that meets legal requirements but has least impact on UK farmers and growers. This is particularly important given that these changes were not supported by UK Government, on the basis they were not proportionate or justified by the available evidence.

The NFU has already begun some initial discussions with CRD and we have some concerns about the way in which it is considering the regulation should be implemented.

Where there are areas that are not clearly defined in the legislation, some early feedback from CRD is that its interpretation of the regulation might be best led by considering the purpose of the restriction. Considering that UK Government believes these regulatory changes are not justified by the evidence, the NFU would argue that the right interpretation of any grey areas would be the interpretation that has the least impact possible for farmers and growers, rather than any interpretation that best meets the Commission's disproportionate purpose.

These poorly defined areas of the regulation could impact particularly on the ornamental plant sector of horticulture, the retail side of which alone is worth more than £1.4 billion a year to the UK economy. Neonicotinoids are important to pest control in this sector and provide effective control of devastating key pests such as vine weevil and whitefly. A pragmatic and light-touch interpretation of the regulation would mean that the ornamentals sector retains the use of these vital neonicotinoids, and we urge the UK Government to ensure its agencies take this least-impact approach when implementing regulation (EU) No 485/2013.

Yours sincerely

