

MEETING WITH BRITISH BEEKEEPERS' ASSOCIATION (BBKA): 21 MAY

Purpose

The BBKA has requested a meeting to discuss the current situation regarding neonicotinoids and bee research. The BBKA will be represented by [REDACTED]

[REDACTED] and [REDACTED].

The BBKA have asked to discuss:

- a) How the restrictions on neonicotinoids will be imposed;
- b) Defra's assessment of the impact of the restrictions and consequential changes in pesticides used and agricultural practices;
- c) Whether it will be possible to conduct field studies on the impact of neonicotinoids on bees; and
- d) [REDACTED].

Restrictions on the use of neonicotinoid insecticides

General background

The BBKA expressed concern over reports of possible harm to bees caused by neonicotinoids and called for a review of the available data on the effects of these compounds. They did not join the organisations which called for restrictions on the use of neonicotinoids. For this, BBKA leaders have faced very considerable criticism.

The European Commission is expected to adopt its proposals to ban the use of the three main neonicotinoids on a wide range of crops. Restrictions will apply from 1 December 2013, for the use of the pesticides and use of seed treated with the pesticide. The restrictions are to be reviewed in the light of current scientific evidence in 2015.

a) How the restrictions on neonicotinoids will be imposed

Points to make

- Once the Commission has adopted its Regulation, this has direct effect. There is very little flexibility for the UK in implementing the requirements.
- HSE has issued an information update to explain the restrictions which has been sent to interested parties and placed on their website. HSE are also in contact with the manufacturers about the interpretation of the measures and with key user representatives to ensure that they are clear on the requirements.
- Once the adopted proposal is published, HSE will write to all UK authorisation holders detailing the changes that will be made to their authorisations. Amendments to authorisations will be made on the latest date allowed.

- These measures do not require special enforcement provisions. The usual mechanisms for picking up illegal use will apply. These include analysis for residues in produce, farm records, cross compliance checks and wildlife incident data.

b) Defra's assessment of the impact of the restrictions

Points to make

- The restrictions will impact on farm economics and farmers may choose to change the crops they grow. If they choose to continue growing the crops affected by the restrictions, some alternative insecticides are available. These include pyrethroids, organophosphates and carbamates.
- The alternative products have been assessed and have met the safety requirements set in legislation. However, each product has different effects in the environment. Pyrethroids are generally acutely toxic to honey bees, however under field conditions they tend to pose a lower risk and some are currently permitted for use while crops are flowering. Pirimicarb (the main carbamate) poses a low risk to honey bees, while organophosphates carry a moderate to high toxicity to most non-target species.
- We agree that it is important to understand all the implications of the restrictions on neonicotinoids, including changes in crops grown and pesticides used. There are many uncertainties and we will continue to liaise with industry bodies to understand how farmers respond to the changed situation. This will allow us to build our understanding of the economic and environmental consequences of the restrictions on neonicotinoids.

c) Our views on how easy it will be to conduct field trials

Points to make

- We do have legal powers to authorise research on neonicotinoids at the national level. This may include field trials on a scale necessary to assess impacts on bees that may forage over substantial distances.
- We believe it is very important that the review of neonicotinoid restrictions in 2015 is informed by strong scientific evidence so that sound decisions can be taken. Companies will need to generate data to meet the requirements of the revised EU risk assessment guidance, which is due to be finalised shortly. We are considering what further work Government should carry out and will involve external experts and interests in this consideration.

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