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Bayer CropScience Limited
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25 July 2013

Dear [REDACTED],

NEONICOTINOID INSECTICIDES AND POLLINATORS

You will be aware of the importance that the Government attaches to having good scientific evidence to take forward this contentious issue. We have therefore been considering a programme of work to assess the risk to pollinators and pollination services from neonicotinoids. I am writing to outline this work and to invite you to explore with us how our collective efforts can best develop the evidence.

I know that your company shares the UK Government's appreciation of the importance of pollinators. Pollinators are essential to the health of our natural environment and to the prosperity of our farming industry. The Government therefore attaches great importance to healthy pollinator populations – including honey bees, bumble bees and solitary bees. We carry out a range of work to safeguard wild and managed bees and support beekeepers. We have recently announced our intention to publish a National Pollinator Strategy in November 2013 in preparation for a public consultation at the end of the year. The Strategy will bring together all the many pollinator-friendly initiatives already underway and frame the way forward for new action. This will include addressing gaps in our understanding of pollinator populations and the threats they face.

As you are very well aware, the European Commission recently adopted measures to ban the use of three neonicotinoids and the sale and use of treated seeds, on a wide range of crops. The Government did not support the Commission's measures because, in our view, the existing scientific evidence does not justify a ban. Indeed, our current assessment of the evidence from laboratory and field work is that effects on bees do not occur under normal circumstances and that the risk to bee populations from neonicotinoids is low.

However, we do accept that the evidence is not conclusive, that the evidence needs have been a matter of fierce contention and that the relative difficulty for NGOs and academics in accessing company regulatory studies has meant that these studies have not always



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been properly taken into account in the public debate. We therefore want to ensure that the science underpinning future decision-making, in particular the review scheduled for 2015, is as strong and incontestable as possible. The recent publication of the EFSA guidance on risk assessment for pesticides and bees is step towards clarity on the European rules.

Studies commissioned by companies such as your own will continue to be important and I know that you have continued to invest in relevant research to build knowledge and to address developing regulatory requirements. However, there may also be a role for Government and others.

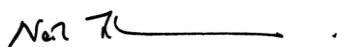
To take our own considerations forward, we have established an external evidence advisory group on pollinators, chaired by Professor Charles Godfray (Hope Professor of Entomology, Oxford University). This group is assisting us in identifying ways to strengthen the scientific evidence base, to reduce the uncertainties and help ensure the Commission's review by 2015 is founded firmly on robust scientific evidence.

It would be extremely helpful to understand, in strict confidence, the nature and extent of any further work planned by your company in the context of the revised regulatory requirements and the 2015 review. This will help inform our consideration of the wider neonicotinoids evidence base and, in particular, what additional work might need to be undertaken, over and above the industry-sponsored activities aimed at delivery to the regulatory requirements.

I would like to invite you or a colleague to talk about your own plans and your thoughts on future requirements in more detail. I appreciate that it might be difficult for you to talk about your own plans in a meeting involving other industry representatives, so I am happy for this initial discussion to be bilateral. We need to progress this work urgently and my office will be in touch to arrange a discussion.

I am copying this letter to Professor Ian Boyd, Defra's Chief Scientific Adviser and to [REDACTED] at the Crop Protection Association. I am also writing in similar terms to [REDACTED] at Syngenta.

Yours sincerely,



Neil Thornton
Director Food and Environmental Risk

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