



Commissioner Dalli  
European Commission  
B - 1049 Brussels

Our ref:  
Email:  
Direct line:  
Date:

15 June 2012

Dear Commissioner Dalli

#### **Discussion of a precautionary ban of neonicotinoid seed treatments at an EU level**

The NFU is extremely concerned about a proposal from the French Minister that the European Commission should take EU-wide precautionary action to ban on the use of neonicotinoid seed treatments, as discussed at the Standing Committee on the Food Chain and Animal Health (SCoFCAH) meeting held on 7 June.

We have read with great interest the recently published EFSA Scientific Opinion on the science behind the development of a risk-assessment of Plant Protection Products (PPPs) on bees, and the Statement of EFSA reviewing the recent studies on bees and neonicotinoids. This issue is very important to our industry in terms of agricultural pollination and the availability of PPPs, both of which are vital elements of sustainable food production.

The Scientific Opinion identified gaps in knowledge and made recommendations to improve the current risk assessment. The NFU welcomes this - as the science moves on our understanding improves and this enables us to identify gaps in current regulatory processes and develop ways to improve them accordingly.

The EFSA statement on two recent studies – by Henry et al., and by Whitehorn et al. – is also welcome. This review found these studies to be inconclusive and as such we believe they cannot be used to support calls for bans on the use of neonicotinoids.

The NFU fully supports a risk-based approach to regulation. In the absence of a weight of evidence to support a change to approvals for neonicotinoid products, any such change would be on the basis of a precautionary hazard-based approach. We cannot support this and are deeply concerned that to take such action would set a remarkable and damaging precedent (considering the hazard of concern is impact on non-target beneficial insects) and would undermine the role of EFSA and the whole EU regulatory process which is anchored in a science-based approach.

A ban on the use of just thiamethoxam on oilseed rape could affect over 430,000 ha of crop in the UK. Such a ban would result in a significant reduction in yields, and the use of a much higher volume of alternative, less effective, active ingredients that we believe would result in an increased risk to the environment, bees and other beneficial insects. Wider precautionary bans in other neonicotinoid/crop situations would magnify these damaging impacts significantly, seriously compromising the sustainable production of many EU crops. We noted that the EFSA Scientific Opinion made it clear that there is a trade-off between plant protection and the protection of bees. Any precautionary ban would ignore this fact and be based on a grossly simplistic non-science based view of the important balance between production and environmental protection.

The NFU fully supports EFSA's work to fully review the risk assessments for neonicotinoids, due to be published in December 2012, and would urge the European Commission not to take any action regarding neonicotinoids and bees before this work is made work available.

I have sent a copy of this letter to your Chef de Cabinet Claire Grech, and colleague Commissioner Ciolos.

Yours sincerely

