



Rt Hon Owen Paterson MP
Secretary of State for Environment, Food and
Rural Affairs
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Dear Secretary of State

Thank you for your letter of 17 April regarding bees and neonicotinoids.

It is encouraging that UK Government remains committed to an evidence-based approach to this issue. You comment that the UK has taken the lead on this issue in Europe. I would like to thank you for this and ask that you continue to demonstrate this leadership by strongly advocating that alternative proposals to the Commission's poorly justified two year ban of three neonicotinoids must be considered fully at Monday's Appeals Committee meeting.

I know you are aware, member states are working on alternative proposals that will offer a more credible, proportionate and meaningful solution than that being put forward by the Commission.

The NFU fully supports your call for the Commission to make a proportionate response to this issue, based on all the evidence and a thorough impact analysis. We share Government's concern about the unintended consequences of hasty action.

The NFU welcomed the Fera field study on bumblebees as another significant piece of the jigsaw in trying to determine any effects of neonicotinoids on bee populations. This and other field studies make it explicitly clear that researchers have been unable to find evidence, under normal field conditions, of any of the harmful impacts seen in laboratory-dosing studies. This then begs the obvious question, if we are unable to measure *harm* caused by neonicotinoids under field conditions, how would it be possible to measure any potential benefits arising from a ban on their use? As it stands, the Commission's proposal is seeking to bring about a change in regulation in the full knowledge that it will not deliver any measurable benefits for bee health.

As we enter what could be the last phase of the bees and neonicotinoids debate, it is very clear to us that, whatever the outcome is, it will have significant future implications. The NFU's major concern is that a poorly evidenced, disproportionate and overly precautionary outcome will set a dangerous precedent for other pesticide regulation within the EU – namely the development of new EU rules on endocrine disruption, and EFSA's draft guidance document on assessing the impacts of all pesticides on bees.

As with bees and neonicotinoids, the approach adopted in these other areas favours theoretical risks over evidence that harm actually occurs under normal use conditions. If these other



proposals are implemented in their current, overly precautionary form, our understanding is that we would lose approvals for around 80% of fungicides and nearly all insecticides in the UK.

Again, the Commission's response to these issues is not proportionate, and threatens to remove essential technologies and crop protection tools that UK and EU farmers and growers need if they are to remain competitive and deliver for food production and the environment.

The Commission's precautionary approach in the whole area of pesticide regulation is becoming a serious threat to the future of productive farming in the EU. We urge the UK Government to continue its strong defence of and vocal support for evidence-based proposals and decisions at Monday's Appeals Committee meeting.

Yours sincerely

