



Lord de Mauley  
Parliamentary Under-Secretary  
Defra  
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Your ref:

Our ref:

Email:

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Date: 25 October 2012

Dear *Lord de Mauley,*

#### **Neonicotinoids and bees**

You will be aware of the concerns being expressed by some organisations regarding the regulatory assessments relating to neonicotinoid pesticides and in particular the effects of these insecticides on bees and other pollinating insects.

This issue is very important to our industry in terms of agricultural pollination and the availability of crop protection products, both of which are important elements of sustainable food production.

The NFU echoes comments made by Defra in welcoming the EFSA Scientific Opinion published earlier this year, which identified gaps in knowledge and made recommendations to improve the current risk assessment. 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 assessments of recently published research in the EFSA statement and recent Defra report (the state of the science and the regulatory response) are also welcome. These balanced reviews have found these studies to be inconclusive in terms of the sub-lethal effects that are likely to arise from current uses 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, changes would be on the basis of a precautionary hazard-based approach, which we do not support. The NFU believes that taking a hazard-based approach would undermine the EU regulatory process that is anchored in a science-based approach.

The EFSA Scientific Opinion highlighted that consideration needs to be given to the trade-off between plant protection and the protection of bees. Neonicotinoids are a diverse group of chemicals used in very different ways. In many cases they are the most effective pesticides available. Having to rely on the currently available alternatives could result in a significant reduction in yields and the use of a much higher volume of less effective active ingredients that we believe could result in an increased risk to the environment, bees and other beneficial insects.

The NFU fully supports the evidence and risk-based approach that has been taken by Defra on this issue, and we look forward to seeing the outcome of EFSA's work to review the risk assessments for neonicotinoids, due to be published in December 2012.

Yours sincerely

