



Department
for Environment
Food & Rural Affairs

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helpline@defra.gsi.gov.uk
www.gov.uk/defra

Your ref:
Our ref: RFI 5741
Date: 20 September 2013

By email only to

Dear

REQUEST FOR INFORMATION: NEONICOTINOIDS

Thank you for your request for information regarding;

1. Briefing provided to Ministers on alternative pesticides (that are likely to be used in the UK following the EU's decision to introduce restrictions on neonicotinoids) and their potential environmental impact. You have requested the details of this briefing, who discussed this with Ministers, on what date, and what information did they provide;
2. The Minister of State for Agriculture and Food, (David Heath) and his statement regarding dosages (of neonicotinoid insecticides) under field conditions being lower than those applied in the laboratory (relating to trials). You have asked; if this information was provided to Mr Heath from Defra, and that we provide evidence to show that the laboratory doses were higher than those found in field conditions. You have also asked if this (information) was not provided by Defra, was this also an issue previously discussed with Ministers (as with the issue of alternative pesticides) and whether we can provide details regarding that particular briefing.

We received your request on 28 August 2013. As you know, we have handled your request under the Environmental Information Regulations 2004 (EIRs). I will respond to your request in the same order.

1. Briefing provided to Ministers on alternative pesticides

I can confirm that Defra holds four documents that contain the information you have requested. Following careful consideration, we have decided to disclose most of this information to you. However, three of the documents also contain information that doesn't fall within the remit of your request. Therefore, to avoid sending you heavily redacted documents, I have enclosed a digest of the information you have requested at Annexes A to C which can be disclosed.

I'm unable to provide you with the names of the officials who drafted the briefings;



regulations 12(3) and 13(1) of the EIRs provide that personal data relating to junior Civil Servants is exempt information if disclosure would breach the Data Protection Act (DPA) 1998. However, I can confirm that the documents were drafted by Defra officials and were addressed to Ministers, the details of which are summarised below:

- 'Key Brief 9 – Alternatives' of 12th December 2012 for Lord de Mauley in preparation for his appearance at the Environmental Audit Committee's hearing into 'Insects and Insecticides' (see attached document);
- 'Neonicotinoids Update' of 22 March 2013 addressed to the Secretary of State, Owen Paterson (Annex A);
- 'Impacts of the Commission's Proposal on Neonicotinoids' of 13 April addressed for the Secretary of State (Annex B); and
- 'Neonicotinoids and the Next Steps' of 13 May to the Secretary of State, Lord de Mauley (Annex C).

2. Field Doses

I can confirm that the information the Minister referred to regarding field dosages was provided to him by Defra. The evidence for this that you have requested is already available from 'Defra's Assessment of the key evidence about neonicotinoids and bees'. This was published on the Gov.uk website on the 27th March 2013 (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221052/pb13937-neonicotinoid-bees-20130326.pdf). You should specifically refer to the Executive Summary, and Para's 3.2.2, 3.3, 4.1.1 and 4.1.3.

As the information you have requested is already publicly available and easily accessible to you in another form or format, regulation 6(1)(b) of the EIRs exempts Defra from providing a copy in response to your request.

In keeping with the spirit and effect of the EIRs, and in keeping with the government's Transparency Agenda, all information is assumed to be releasable to the public unless exempt. Therefore, the information released to you will now be published on www.gov.uk together with any related information that will provide a key to its wider context. Please note that this will not include your personal data.

I attach Annex D, which explains the copyright that applies to the information being released to you. I also attach Annex E giving contact details should you be unhappy with the service you have received.

If you have any queries about this letter, please contact me.

Yours sincerely

Department for Environment, Food and Rural Affairs

Tel:

Email:

Annex A

'Neonicotinoids Update' of 22 March 2013

Environmental impacts of alternatives

For the UK, the most significant restriction in the Commission proposal is the ban on uses on oilseed rape. The immediate consequence of this restriction would be that growers would use an increased number of pyrethroid sprays on oilseed rape. There is already some resistance of aphids to pyrethroids and increased use without the alternative control method provided by neonicotinoid seed treatment will increase the resistance pressure for these substances. It is likely that these products would in a short period become ineffective, leaving no alternative control measures available.

Across the board, farmers will respond to loss of neonicotinoids by using the available alternative products, including pyrethroids, organophosphates and carbamates.

All of these products have been assessed and has met the safety requirements set in legislation. However, each product will have different effects in the environment.

Pyrethroid sprays are generally acutely toxic to honey bees. However, under field conditions they tend to pose a lower risk and as a result some are currently permitted during flowering. Pyrethroids also pose a risk to aquatic life and as a result buffer zones are required. In addition, pyrethroids also pose a risk to non-target arthropods and as a result carry risk mitigation phrases. Pyrethroids tend to be of low toxicity to birds and mammals.

Pirimicarb, the main carbamate, is acutely toxic to birds, mammals and aquatic life but poses a low risk to honey bees and non-target arthropods and earthworms. Organophosphates tend to carry a moderate to high toxicity to most non-target species.

Annex B

Note on the 'Impacts of the Commission's Proposal on Neonicotinoids' of 13 April

Impacts of the restrictions

Growers will have to adjust their farming practice. If they chose to continue growing the crops affected by the restrictions, some alternative pesticide control measures are available. For the UK, the most significant restriction in the Commission proposal is the ban on uses on oilseed rape. The immediate consequence of this restriction would be that growers would use an increased number of pyrethroid sprays on oilseed rape. Across the board, farmers would respond to loss of neonicotinoids by using the available alternative products, including pyrethroids, organophosphates and carbamates.

Environmental impacts

All of the alternative products have been assessed and have met the safety requirements set in legislation. However, each product will have different effects in the environment.

Pyrethroid sprays 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. Pyrethroids also pose a risk to aquatic life and so are subject to a legal restriction preventing their use close to water courses. In addition, pyrethroids pose a risk to non-target arthropods and so carry risk mitigation phrases. Pyrethroids tend to be of low toxicity to birds and mammals.

Pirimicarb, the main carbamate, is acutely toxic to birds, mammals and aquatic life but poses a low risk to honey bees and non-target arthropods and earthworms. Organophosphates tend to carry a moderate to high toxicity to most non-target species.

Annex C

'Neonicotinoids and the Next Steps' of 13 May

Alternative products

HSE are following up with farming interests to explore the alternatives that will be used in place of the restricted substances. They are, in particular, speaking to the Agricultural Industries Confederation, whose members include the seed distributors and employ many of the agronomists who will advise farmers on crop protection. Clearly, alternative insecticides will be used where these are available. In many cases farmers are likely to turn to pyrethroids but other types of insecticide may also be used.

Each of the alternative products will have different effects in the environment. All of products have been assessed and have met the safety requirements set in legislation. Where required, products are subject to conditions of use to prevent unacceptable impacts on the environment. For example, pyrethroids pose a risk to aquatic life and so are subject to a legal restriction preventing their use close to water courses.

The alternative products will be helpful in some situations but there will be reduced pest control and consequent economic losses, with the impact on margins being significant for some growers in some years. Oilseed rape is one of the most profitable break crops in the UK arable rotation. Costs from reduced yields following loss of the neonicotinoids would vary from year to year but would be substantial. There would be implications for how farmers would organise their cropping if they lost the reliability of establishment and reliability of control of aphids that transmit the turnip yellows virus. They might no longer use oilseed rape as a rotational crop with cereals, which would lead to reduced cereal yields. Other possible cereal break crops are problematic.

Annex D

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Annex E

Complaints

If you are unhappy with the service you have received in relation to your request, you may make a complaint or appeal against our decision under section 17(7) of the FOIA or under regulation 18 of the EIRs, as applicable, within 40 working days of the date of this letter. Please write to Mike Kaye, Head of Information Standards, Area 4D, Nobel House, 17 Smith Square, London, SW1P 3JR (email: requestforinfo@defra.gsi.gov.uk) and he will arrange for an internal review of your case. Details of Defra's complaints procedure are on our [website](#).

If you are not content with the outcome of the internal review, section 50 of the FOIA and regulation 18 of the EIRs gives you the right to apply directly to the Information Commissioner for a decision. Please note that generally the Information Commissioner cannot make a decision unless you have first exhausted Defra's own complaints procedure. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF