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From Lord de Mauley
Parliamentary Under Secretary

Dear Mr Morago,

Thank you for your letter of 30 January to David Heath MP, about the AVAAZ petition for a ban on the use of neonicotinoid insecticides. I am replying as the Minister responsible for pesticides, and I apologise for the delay in doing so.

The UK Government appreciates the concerns raised by those who have signed the petition. I agree that pollinators, including bees, are essential to the health of our natural environment and to the prosperity of our farming industry. Defra attaches great importance to healthy bee populations – including managed honey bees, bumble bees and solitary bees. At a purely pragmatic level, pollination is worth several hundred million pounds per year. For Defra, bees are among our greatest allies in delivering our twin priorities of animal and plant health.

Our work to safeguard bees includes:

- The Healthy Bees Plan - working with beekeepers to provide training and respond to pest and disease threats. Within this, Defra's National Bee Unit provides inspection, diagnostic and training services to beekeepers.
- Work under the *Biodiversity 2020* banner. Objectives include a 200,000 hectare increase in priority habitats and 90% in favourable or recovering condition; much of this will benefit bees and other pollinators.
- Entry Level Stewardship - new options from 1 January 2013 include legume and herb rich swards, which will be beneficial to pollinators. Natural England actively help farmers to select the most appropriate ELS options to benefit wildlife including guidance for 'butterflies, bees and vulnerable grassland'.
- £2.5 million Defra funding (2010-2015) towards the £10 million Insect Pollinators Initiative. Of the 9 projects being funded, 2 specifically focus on honey bees, and 6 will benefit both honey bees and bumblebees.



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The Government takes any threat to bees very seriously and we have approached the issue of neonicotinoids in this light, making it clear that we are prepared to take action if the evidence indicates a need. In deciding what action may be needed to protect bees, the correct process is first to collect the evidence and make the best possible assessment of the risks posed by neonicotinoids. Then it is possible to decide a proportionate response. This includes checking for unintended consequences (such as farmers switching from neonicotinoids to alternative products with their own impacts on bees or the wider environment).

Laboratory studies show that bees may be significantly affected by neonicotinoids. However, field data on honey bees indicates that the level of exposure in real life does not lead to these harmful effects. There has been an absence of field data on other bee species and Defra therefore commissioned field trials on bumble bees. This study has now been completed and a copy can be found on the Defra website at:

<http://www.defra.gov.uk/environment/quality/chemicals/pesticides/insecticides-bees/>

In the study, bumble bee colonies were placed within landscapes known to contain oilseed rape treated with neonicotinoids. Measurements were made of colony growth rate, production of queens, neonicotinoid residues in nectar and pollen, and the kind of pollen being collected by the bees. The colonies at all sites grew and produced new queens. The researchers found no relationship between colony growth and neonicotinoid residues within pollen or nectar in the colonies.

The above website link also leads to my Department's assessment of the key evidence, including the latest field study. This concludes that it is not possible to rule out rare effects of neonicotinoids on bees in the field. However, the evidence indicates that effects on bees do not occur under normal circumstances. Consequently, it supports the view that the risk to bee populations from neonicotinoids, as they are currently used, is low.

Pesticides, such as neonicotinoids, can only be sold or used if approved. This is a two stage process, with active substances being approved at EU level and products containing approved active substances being authorised by Member States. Approvals are only granted if assessment of scientific data shows that risks are acceptably low. Approvals are regularly reviewed to ensure they continue to meet current standards. Earlier review is possible if concerns arise and can lead to withdrawal of product authorisations.

The independent Advisory Committee on Pesticides has considered the evidence on several occasions. The Committee advised, following its meeting on 29 January, that there were grounds for a review of neonicotinoid authorisations under pesticides legislation. I have accepted the Committee's advice and officials are taking this work forward.

Neonicotinoids are important insecticides. Their use as seed treatments allows effective control of crops at the earliest stage of crop development and they control pests that are increasingly becoming resistant to other products. Although there are uncertainties, Defra's assessment suggests that it is highly probable that restrictions on neonicotinoids would carry significant costs for agriculture.



As in the UK, consideration of this issue in Europe has been running for some months. Considerable efforts have been put into designing an updated risk assessment process for the effects of pesticides on bees and UK experts have contributed to this work. On the instructions of the Commission, the European Food Safety Authority (EFSA) carried out an assessment of the existing data on the three main neonicotinoids with the emerging new requirements. They published Conclusions in January which indicated, unsurprisingly, that the old data did not fully address the new requirements.

The Commission has drawn up plans for a ban on the use of three neonicotinoids on a long list of crops. This includes a ban on the sale and use of all seeds for those crops treated with the three active substances and a review after 2 years.

The UK has not ruled out action. However, we have urged the Commission to make a proportionate response to the scientific evidence. We have called on it to complete the scientific assessment, taking account of our new research, and to assess the impacts of action so that the measures taken are proportionate to the risks identified.

Thus far, regrettably, the Commission has not listened to our views and those of many other Governments. Its proposal was put to a vote in the Standing Committee on the Food Chain and Animal Health. The UK abstained in this vote and we were not alone. In total 14 Member States either abstained or voted against the Commission.

In Europe, we will continue to press the Commission to complete an assessment of all the science and of the impacts of action. Only then should they draw up proportionate proposals.

We will also continue with our wider work to protect bees. It is very clear that bees face many problems that are unrelated to neonicotinoids and it would be entirely wrong to lose sight of these issues. We are looking across all our activities on bees to see whether there are areas where more work is needed and whether there may be added value in bringing together a holistic strategy or action plan for pollinators.

It is the importance of bees and other pollinators that underpins our work in this area. In addressing the problems facing our bees and pollinators it is vital to understand them, take all the evidence into account and make a considered response. Hasty action is very likely to be ineffective or to have unforeseen consequences. We will continue to look at bee health in the round and will take whatever action is appropriate to safeguard these valuable creatures.

Tris Smith
Rupert de Manley



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