From: Stephanie Williamson
To: [redacted] Davies, Arwyn (CN); [redacted]
cc: Nick Mole; Keith Tyrell;
Subject: 121112 PAN UK comments on bee-toxic pesticides and pollinator declines
Date: 12 November 2012 13:27:24
Attachments: image001.jpg

For the attention of Prof. Ian Boyd, Defra Chief Scientific Advisor and Defra/ CRD colleagues

Dear Ian, Arwyn, [redacted] and [redacted]

First of all thanks very much for taking the time to meet/talk with Nick Mole and me last month to discuss our concerns about neonicotinoids. As promised, I attach a written version of our main points in relation to the Defra response *Neonicotinoid insecticides and bees: the state of the science and the regulatory response* of 13/09/12. Apologies for the delay in sending you these but both our Director, Keith Tyrell, and I had family bereavements to deal with in the last weeks.

I also attach, for your information, PAN UK's individual response to the government stakeholder consultation on implementation of National Action Plans under the Sustainable Use of Pesticides Directive. Some of the issues we raised there, particularly on biodiversity protection and on the need for much more support for Integrated Pest Management, are relevant to the discussions we had with you on pollinator conservation and moving away from today's level of reliance on neonics. I've highlighted in yellow the relevant text sections in our response, including practical suggestions for actions to be added to the UK NAP.

We have been invited to give oral evidence at the parliamentary Environmental Audit Committee inquiry on the effects of pesticides on biodiversity next Weds 21st November and I also attach our written evidence submitted already to the EAC inquiry.

As I'm sure you are aware, since we met significant new research findings from field studies have been published by British researchers (Gill *et al*., 2012, reference below) on bumblebees exposed to a combination of a neonicotinoid and a pyrethroid insecticide. Their findings show how chronic exposure to two commonly-used pesticides at field-relevant doses impaired natural foraging behaviour and increased worker bee mortality, leading to significant reductions in colony success and increased rates of colony failure. A useful commentary on this paper and the regulatory questions it raises was published in the News

& Views section of *Nature* (Osborne, 2012). These findings add further support to our argument for a much more precautionary approach, through immediate restrictions on neonic approvals and more weight given to the 'cocktail' effect in risk assessment and decision making. We trust that Defra, CRD and the ACP will assess as a matter of urgency the implications of this robust study, which sheds new light on how sub-lethal effects on individual pollinators can build up to colony-level performance impacts.

We do hope that we can continue to engage with you on the pressing issues of neonic restrictions and better IPM support for UK farmers over the coming months. In the meantime, we've developed a concept note for a pilot scoping study to explore what an IPM strategy for UK oilseed rape without neonics could look like. We're happy to share this with you as we approach suitable UK universities for interest.

Best wishes

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References

Gill, RJ, Ramoz-Rodriguez, O and Raine, NE. (2012) Combined pesticide exposure severely affects individual- and colony-level traits in bees. *Nature* http://dx.doi.org/10.1038/nature11585

Osborne, JL. (2012) Bumblebees and pesticides. A study showing the effects of two pesticides on bumblebees highlights the need for risk assessments to consider multiple species and the complex chain of factors that determines insect exposure to chemicals. News and Views, *Nature* doi.10.1038/nature11637