From: Paul de Zylva
To: Boyd, Ian (Defra);
cc: [redacted] matt.shardlow@buglife.org.uk; keithtyrell@pan-uk.org; iain@avaaz.org; Wainwright, Stuart (Defra); PS/ Lord de Mauley (Secretariat); Samuel Barratt;
Subject: Re: Neonicotinoid briefing
Date: 04 April 2013 09:36:07

Ian,

Bees and neonics meeting

Thank you and it was good to meet you and Lord De Mauley yesterday to discuss evidence, lack of evidence, the Government's position on neonics and a potentially better position beyond the current process.

Without speaking for Matt, Keith, Sam or [redacted], I think we had a frank discussion with some hope for a way ahead beyond the current focus on the EC neonics proposal.

For my part I think the main areas for consideration as covered in our discussions are probably as follows:

1. Government position

The Government is lagging behind public opinion. From my contact with beekeeping associations, businesses and civil society organisations it is also misjudging public concern.

Professed concern about bees and pollinators is not being matched with much other than rhetoric; in

particular it is not discernible how the precautionary principled is informing decisions and action rather than being used as a reason not to act.

2. Field trial

The single Defra / FERA field trial is inconclusive at best and can be no sound basis for the status quo.

During the recent Westminster Hall debate secured by Sarah Newton MP on bee health, David Heath MP replied and described the field trial results as 'positive'. That is an odd interpretation and indicates to me than in the absence of properly designed studies Ministers are grasping at any slight studies to resist or delay action or proper evidence gathering.

2. DEFRA assessment of evidence

Similarly, the anonymous and non-peer reviewed assessment which appeared last week following the field trial is not a good piece of work likely to build trust.

It is not good practice to put out such unattributed and non-peer reviewed papers which call into question the validity of other work which has been peer-reviewed and published in Nature and Science journals.

It is disappointing that the Government and its

agencies chose to publish this; I take it as an attempt to elevate its own single study over other studies and to cloud rather than clear matters.

This is not acceptable and if we are to make progress I hope you and Lord de Mauley will ensure that Defra and its agencies avoid such occurrences.

3. Ad-hoc studies

As I advised, it is unsafe to continue seeking evidence to support the Government's view on neonics in an ad-hoc way as has been the case since the Government reacted to the publication of the Whitehorn, Henry and Gill studies leading to the September neonics review and the somewhat flawed and certainly inconsequential field trial.

In the meeting you said that the sum of the evidence gathered so far does not point enough in one way or the other. There are lots of studies and in the context of the products not having been tested properly on wild pollinators - and no industry studies being easily available, if they exist at all - I don't think the Government can claim to be standing on solid scientific and evidential ground.

This all points to the need for proper studies and proper ongoing monitoring. (By the way I note that the

Syngenta / Bayer 5 point call for a pollinator plan is an admission that there is inadequate testing and monitoring. So we agree on something even if they start from the position that their products could have no conceivable role in insect decline.)

4. Proper studies

As I recommended in the meeting, the Government should now put in place on-going means to test species and products and to monitor in real time.

As we discussed, proper monitoring of and research into our natural environment is not well supported or funded but is sorely needed.

I recommend that Government and agency budgets and resources be reworked to help put this in place and to rebalance work of FERA to provide proper resource, for instance, to Natural England (if it survives the Triennial Review) to do the necessary ongoing monitoring that would give the Government proper basis for good decision making and help inform public understanding of the causes of decline and solutions.

As some of us indicated in the meeting we can assist the development of this and Friends of the Earth would see this as part of the bee / pollinator action plan we have invited the Government to join.

5. Economics

Government references to the economics of neonicotinoids are valueless unless backed by proper evidence.

I took from the meeting that the Government is not seeking to carry out new research into the economics of pollination, crop treatments and any changes in practice ahead of, and to further inform decision on neonics, in the EC process. If that is not correct do please advise on the Government's plans.

From what you said I also understand that the Government will not be drawing on or citing the speculative industry-sponsored Humboldt report as a basis for any decision.

I look forward to our ongoing discussion and to leadership by the Government on these matters

Regards,

paul

Paul de Zylva
Friends of the Earth

On 4 Apr 2013, at 08:24, "Boyd, Ian (Defra)" <Ian.Boyd@defra.gsi.gov.

uk> wrote:

Dear All

I wanted to follow up quickly from our meeting with two immediate points. First, thank you for coming and, while we may see some things differently, we do seem to see a common way forward. Second, I have begun the implementation of the actions we agreed with Lord de Mauley and I will be in touch very soon to set up a meeting to take these forward.

In the meantime, please do contact me if I can help.

Kind regards

Ian

[redacted]

Professor Ian Boyd, FSB, FRSE,
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Department for Environment, Food and Rural Affairs (Defra)

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