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An emergency authorisation for the use of Neonicotinoid seed treatments on oilseed rape in England.

Defra Chief Scientific Adviser's opinion

1. Neonicotinoids have been subjected to the same rigorous toxicity testing and expert assessment as all other licenced pesticides. This has led to them being licenced for use within the EU and the UK.
2. As a result of the use of these chemicals at commercial scales, circumstantial evidence is emerging that some neonicotinoids when used in particular ways may have some effects on wildlife, especially some pollinating insects.
3. There is still uncertainty about how severe and widespread these effects may be. They are small enough that they are difficult to measure. For example, they are likely to be smaller than the effects of varying weather patterns between years.
4. Recent restrictions applied by the EU are therefore precautionary. There are specific instances where farmers can demonstrate that they have adopted low risk behaviours but have still encountered demonstrable severe pest problems. This is why the EU permits Member States to issue Emergency Authorisations for uses that are 'limited and controlled'.
5. The NFU is seeking emergency authorisation for the use of neonicotinoids on Oil Seed Rape (OSR) in Suffolk. This is around 5% of England's OSR crop area. The application describes procedures to control the use of neonicotinoids within this region. **I advise that such an authorisation is likely to meet the standard required of being 'limited and controlled'.**
6. In future it is likely that many chemicals will have to comply with this kind of system of regulation where authorisation for use is based upon evidence of need and is risk-based. Granting this authorisation is encouraging the building of best-practice in to the industry and is giving a strong signal to the industry that they need to innovate around more restricted availability of chemicals.
7. Failing to grant the authorisation will encourage substitution possibly with other chemicals that are less effective and more dangerous. For example, we know that last year the restrictions on neonicotinoids resulted in the importation of Mesurool from France. This is an organophosphate that is known to kill birds.
8. Granting the application will also increase our knowledge of the effects of neonicotinoids because we will have one treated region (Suffolk) to compare with other untreated regions.

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