

Scottish Wildlife Trust

Briefing

Neonicotinoids – post EU vote



The European Commission's proposed restricted use of neonicotinoids

On 15 March the European Commission put forward an amendment regarding the conditions of approval¹ of the use of three neonicotinoid products (clothianidin, thiamethoxam and imidacloprid). In effect, it was asking Member States to vote in favour of a restriction of the use of the above three active substances which it had proposed should be prohibited for use on crops attractive to bees and to cereals except for winter cereals.

Over 2.5 million people across Europe support the Commission's proposed ban.

Ban proposed because of risk to honeybees and bumblebees

The EU Commission's proposed ban follows on from the recommendations of the report published by the European Food Safety Authority (EFSA)² which identified some high acute risks to honeybees from neonicotinoids and highlighted critical data gaps that prevented a full risk assessment for other exposure routes and to other insect species.

The Scottish Wildlife Trust fully supports the Commission's proposed restrictions which are a measured response to the identified risks and uncertainties, in line with the precautionary principle. Bees and other pollinating insects play a vital role in food production, worth approximately £43 million/yr to Scotland's economy, as well as being an integral part of natural ecosystems.

Most of Scotland's plant communities rely on pollinating insects to reproduce and therefore spread. They also form a vital part of the food chain for other species such as birds, reptiles and amphibians. It follows that any insecticide that drastically reduces pollinator numbers will have effects beyond the agricultural sector and will ultimately affect the health and function of entire ecosystems.

Vote Result

The vote at the Standing Committee³ was inconclusive. Thirteen of the 27 Member States voted in favour of the ban⁴, nine voted against⁵ and five, including the UK, abstained.⁶

What happens next?

This does not mean that it is the end of the line for the ban. It is highly likely that the European Commissions will take the decision to an appeals committee later in the month. The same "hung" vote at the appeals committee would mean the EC could enforce the ban. A spokesperson at the Commission has stated "The commission takes note of the Member States' response to its proposal but remains committed to ambitious and proportionate legislative measures." It said it would decide whether to go to appeal, or revise the proposal, in the next week.⁷ In any event, if the stale mate is not resolved in the next two months then the Commission can impose a ban.

Why did the UK abstain?

The UK's Environment Minister, Owen Paterson MP had stated earlier this year that the Government wanted to receive the results of its own trials of the effects of neonicotinoids on bees, before taking a firm decision regarding its position. However, the results of Defra's own field trial were not available at Friday's meeting because the field trials have been seriously compromised by contamination from neonicotinoids. Prof. Ian Boyd, Defra's chief

¹ Amending Implementing Regulation (EU) No 540/2011

² See: <http://www.efsa.europa.eu/en/press/news/130116.htm>

³ Standing Committee on the Food Chain and Animal Health

⁴ Included countries such as France, Italy, Belgium, Slovenia, Spain, Poland and the Netherlands

⁵ Included countries such as Ireland, Hungary and the Czech Republic

⁶ Other abstentions came from Germany, Bulgaria, Estonia and Finland.

⁷ See <http://www.guardian.co.uk/environment/2013/mar/15/bee-harming-pesticides-escape-european-ban>

scientist, gave evidence to the UK Environmental Audit Committee on 27 February and stated that at the control site of the bumblebee study, there were residues of neonicotinoids in pollen and nectar.⁸

What can the Scottish Government do?

As this is a devolved issue, the Scottish Government does not have to go along with Defra's position, which states that the evidence is not presently strong enough to support a ban (which is contrary to the findings of the EFSA).

At the very least the Scottish Government could advise the UK Environment Minister to support the Commission's proposals - on the 27 February the Trust, along with four other NGOs⁹, wrote to the Cabinet Secretary Richard Lochhead about this very issue - urging him to advise the UK Environment Minister to support the ban.¹⁰

The Scottish Wildlife Trust's position

There is a growing body of evidence that shows that neonicotinoids have a detrimental effect at sub-lethal doses on insect pollinators. For this reason, the Scottish Wildlife Trust believes that the Scottish Government should adopt the precautionary principle and place a moratorium on their use on all outdoor crops in Scotland until there is convincing scientific evidence that pollinator populations, and by extension ecosystem health, are not significantly impacted upon by use of neonicotinoids.

The Scottish Wildlife Trust's campaign

In October 2012, the Scottish Wildlife Trust wrote to the Cabinet Secretary for Rural Affairs and Environment, Richard Lochhead MSP, urging the Government to halt the use by farmers of all products containing neonicotinoids.¹¹

The unknowns

- impacts on soil dwelling invertebrates – imidacloprid has been shown to accumulate in soils¹²
- impacts on aquatic invertebrates - neonicotinoids are highly soluble and through run off could make their way into watercourses
- contamination of field margins – neonicotinoids have been found in field margin dandelions¹³
- effects on other wild pollinators - honey bees (which are not 'wild pollinators') account for only c 30% of crop pollination - the rest is done by bumblebees and other wild pollinators
- effects on agricultural ecosystems

What do leading scientists think?

Professor Dave Goulson, leader of the research group which conducted the trial on the potential effects of neonicotinoids on bumblebees earlier this year, is of the opinion that the widespread use of neonicotinoids is likely to be having a significant impact on wild bee populations. Until further research can be carried out, he supports a moratorium on use of neonicotinoids on flowering crops. He also questions the prophylactic use of pesticides, which is contrary to the long-established principle of pest management that chemicals should only be used when there is a pest problem. Prophylactic use is highly likely to lead to resistance in pest species.

He recently stated in the press that:¹⁴ "The independent experts at EFSA spent six months studying all the evidence before concluding there was an unacceptable risk to bees. EFSA and almost everybody else – apart from the manufacturers – agree this class of pesticides were not adequately evaluated in the first place. Yet politicians choose to ignore all of this."

If you would like to join our campaign then please visit our website at: <http://scottishwildlifetrust.org.uk/how-you-can-help/appeals-and-campaigns/act-now-to-help-save-our-bees/>

Dr Maggie Keegan
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⁸ See: Q620 <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/c668-vii/c66801.htm>

⁹ RSPB Scotland, Buglife, Butterfly Conservation and Friends of the Earth Scotland

¹⁰ See: http://scottishwildlifetrust.org.uk/docs/002_057__lettertorichardlochheadmsp_mar2013_1362395346.pdf

¹¹ See:

http://scottishwildlifetrust.org.uk/docs/002_057__publications__policies__Scottish_Wildlife_Trust_letter_to_Richard_Lochhead_on_neonicotinoids__Oct_2012__1350318289.pdf

¹² See: <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/c668-iv/c66801.htm> Questions from Q289 onwards

¹³ Krupke CH, Hunt GJ, Eitzer BD, Andino G, Given K (2012) Multiple Routes of Pesticide Exposure for Honey bees Living Near Agricultural Fields. PLoS ONE 7(1): e29268. doi:10.1371/journal.pone.0029268

¹⁴ See: <http://www.guardian.co.uk/environment/2013/mar/15/bee-harming-pesticides-escape-european-ban>