

St. Andrew's House
Regent Road
Edinburgh
EH1 3DG



December 1 2015

Dear Mr Lochhead,

We are writing to ask the Scottish Government to permanently ban the use of three neonicotinoid insecticides¹ on outdoor crops in Scotland.

In December 2013 the EU introduced a ban - to be reviewed after two years - restricting the use of three types of neonicotinoid insecticides due to the "high acute risks" to bees. Since then, there has been considerable research activity which has justified the decision to ban these chemicals.

We now know that neonicotinoids are harmful to pollinators: they damage bee brains; reduce bumblebee queen production; reduce wild bee density and solitary bee nesting; lower bumblebee colony growth and reproduction; and may negatively affect wild bees even more than honeybees (because honeybees are better at detoxifying after neonicotinoid exposure compared to bumblebees). Neonicotinoids persist and contaminate soils; are taken up by wildflowers at arable margins; leach into the aquatic environment; may lead to a decline in insectivorous birds and butterflies in farmed systems; and may impact on terrestrial and aquatic ecosystems. Neonicotinoids are also tasteless to bees in pollen and nectar which means that bees do not avoid them when foraging.

Pollinators provide an essential ecosystem service to farmers and fruit growers worth at least £43 million per year to Scotland's economy. Given the importance of bees and other pollinators in the ecosystem and the food chain and given the multiple services they provide to humans, their protection is essential – this is why the ban must be made permanent and extended to all types of seed treatments and foliar sprays that are composed of these three chemicals.

In April 2013 you stated that: *"the Scottish Government takes the health of bees and other insect pollinators very seriously but, in this case [impacts of neonicotinoids], the science has not been clear cut"* and that *"When it comes to protecting our biodiversity and wildlife, there are times when taking a precautionary approach is perfectly justifiable."*

Does the Scottish Government now accept that the weight of evidence is compelling and that the risk to bees is essentially confirmed?

Permanently banning the use of these three neonicotinoids - which are broad spectrum, persist in the environment, affect other wildlife and are used in a prophylactic way as seed treatments - aligns with integrated pest management which aims to manage pests and diseases economically and sustainably with the least possible hazard to people and the environment. Currently neonicotinoid use on cereal seeds is relatively minor, but is increasing rapidly, action now to ban this use would prevent a problem developing and more uncomfortable action being necessary in the future.

With a permanent ban in place, farmers will need guidance on what are safe and effective alternatives to use, both chemical and non-chemical, especially when used on crops that are attractive to pollinators.

¹ clothianidin, imidacloprid and thiamethoxam

This is why there needs to be substantial investment in integrated pest management, supported by the Scottish Government, to help Scotland's farmers cut their use of all types of pesticides. Coupled with this we also call for robust testing systems to ensure that approved pesticides do not harm non-targeted wildlife and ecosystems.

Banning these three neonicotinoids, reducing all pesticide use by applying integrated pest management, and having a robust testing system to ensure biodiversity and wildlife are protected, would contribute to protecting Scotland's "*clean and green status*" and enhancing Scotland's reputation which you have stated "*is known around the world for its beautiful natural environment*".

The Scottish Government has the power to permanently withdraw these three neonicotinoids from use on all outdoor crops in Scotland, and does not have to align with the UK Government's view on this issue.

We urge the Scottish Government to exercise this power to help save our wild pollinators, the ecosystem services they provide and the agricultural ecosystems they support.

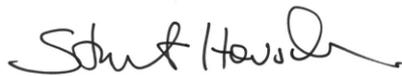
Yours sincerely,



Jonathan Hughes CEO Scottish Wildlife Trust



Craig Macadam Conservation Director, Buglife Scotland



Stuart Housden OBE Director, RSPB Scotland



Paul Kirkland. Director, Butterfly Conservation Scotland