

Rùnaire a' Chaibineit airson Cùisean Dùthchail, Biadh agus an Àrainneachd
Cabinet Secretary for Rural Affairs, Food and the Environment
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Jonathan

Thank you for your letter of 1 December, issued jointly with Buglife Scotland, RSPB Scotland and Butterfly Conservation Scotland, asking me to permanently ban the use of neonicotinoid pesticides on Scottish crops.

I share your interest in the issues around neonicotinoids and can assure you that the Scottish Government (SG) continues to monitor the situation.

Advice from the SG's Chief Scientific Adviser for Rural Affairs, Food and the Environment, is that in general, land-use change and intensification, and the resulting loss of floral resources, are likely to be the most important factors affecting pollinator decline.

I know there have been a number of published scientific reports about neonicotinoids and pollinators reported in the press. Those reports suggest that neonicotinoids present at concentrations likely to be found in the pollen and nectar of treated crops can cause harmful sub-lethal effects to honeybees and wild pollinators. However, the issue is that we do not yet have enough scientific evidence at the right scale to know if these effects are strong enough to affect the health of honeybee colonies, the abundance and viability of wild pollinator populations, or the pollination services they provide.

In the meantime, I support Europe's precautionary approach and the continuation of the current restrictions on the use of the neonicotinoids. The European Food Safety Authority (EFSA) are currently assessing all the new research findings, and will publish a report summarising their findings by the end of January 2017. This is an important analysis, and we will consider carefully what EFSA and the European Commission have to say.

I think that it is very important that we understand the factors that influence pollinator numbers. So we asked Scottish Natural Heritage to prepare a national pollinator strategy for consultation. That consultation runs until 14 March 2016 - I hope all individuals and organisations with an interest take this opportunity to submit comments.

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As part of SG work, we take soundings from bee keepers. The SG's Bee Inspectors advise that honeybee keepers have not reported any negative effects on their hives prior to Europe restricting the use of these neonicotinoids, even though at that time many hives were in close contact with winter sown oilseed rape which had been treated with neonicotinoids.

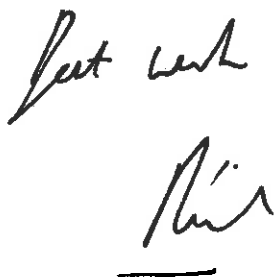
Our Inspectors report that there are many beekeepers in Scotland who are concerned that the neonicotinoid restrictions could limit the area of oilseed rape grown here. Their concern stems from the fact oilseed rape is the main source of nectar and pollen for bees which helps to strengthen the colonies in the early part of the year. Winter sown oilseed rape produces an abundant source of early nectar much welcomed by bees and beekeepers at a time of year when relatively little else is available in the way of nectar. Survey work carried out by SASA (Science and Advice for Scottish Agriculture) suggests that so far the restrictions did not impact on the Scottish oilseed rape yield, which went up by 4% in 2015, the first year without growers' access to neonicotinoid coated seeds, compared to 2014. We will, however, continue to monitor this situation.

We are also taking steps to make sure that farmers have the best advice on crop management. As I indicated in my letter of 10 June 2013 to the Scottish Wildlife Trust, the SG funds staff at Scotland's Rural College (SRUC) to give advice to farmers on alternative and non-chemical methods to combat pests, weeds and diseases.

SRUC staff also widely promote integrated pest management (IPM) measures, for example, through their crop health reports and at farmer meetings. You will be interested to know that IPM will be promoted at the joint SRUC and Agriculture and Horticulture Development Board's winter road shows at Aberdeen, Perth, Carfraemill and Inverness.

The SG also funds research on IPM as part of its five years Strategic Research Programme (SRP). IPM research will form a significant part of the forthcoming SRP running from 2016-2021. The SRP also invests in research on land-use, ecosystems and biodiversity, important factors in relation to pollinator populations.

I hope you find this helpful.



RICHARD LOCHHEAD