



c/o Buglife
The Lindens,
86 Lincoln Road,
Peterborough
PE1 2SN

Robert Goodwill MP
Minister of State for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
London
SW1P 4DF

9th May 2019

Dear Robert,

Re. Please implement EFSA's 2013 Bee Guidance in the UK

We are writing to you on behalf of 226,845 petition signatories as well as members of the above organisations to ask you to support the complete implementation of the European Food Safety Authority's bee guidance for the assessment of risks posed to honeybees and wild bees from pesticides.

226,845 members of the public have signed a petition calling on you and other European ministers to support higher standards for assessing how pesticides harm bees. You can view the petition here: <https://www.sumofus.org/bee-guidance>

Last spring, we learnt with great relief that the EU, with the support of the UK, had finally banned all outdoor uses of three neonicotinoids, namely imidacloprid, clothianidin and thiamethoxam. SumOfUs members, Buglife and others had been calling such a ban for many years.

However, other new pesticides have also been shown to negatively impact bees' health. This includes cyantraniliprole and new neonicotinoid substances such as sulfoxaflor and flupyradifurone, which give rise to major concerns. Worryingly, these substances are being lined up to replace the banned neonicotinoids. Bee harming pesticides such as these should NOT be approved for use because they have not been assessed according to latest scientific knowledge.

The EU Pesticide Regulation 1107/2009 requires that pesticides are assessed “in the light of current scientific and technical knowledge”. However, this is not currently the case for risks to bees, which the UK identified and raised as an issue in 2009. In response EFSA published an updated bee guidance document setting more comprehensive testing requirements.

The EFSA bee guidance addresses a wide range of potential impacts, including the effects of chronic exposure and effects on larvae. It also covers the risks to wild bees, in addition to managed honey bees. EFSA worked with independent experts and stakeholders to incorporate the latest scientific knowledge and ensure that the guidance reflects best practice in bee risk assessment.

We acknowledge the 7 January response from Michael Gove expressing support for the need to “develop [the EFSA Guidance] into a fully effective text”, and the context to this provided by yesterday’s announcement of an EFSA led review of the guidance. While the EFSA guidance is a solid step in the right direction, we are very clear that it does not go far enough in terms of the depth of the science required and the range of pollinator species covered. It only covers three species of pollinator, all bees, there are another 250 species of bee, plus over 2000 species of butterflies and moths, and thousands of other pollinators that the EFSA guidance does not seek to test. While many will benefit incidentally from the new guidance, we can be certain that within the varied ecology of these species there will be many species that will be more sensitive to some pesticides than the three test bed species selected by EFSA. We note that this shortcoming of the guidance is not within the scope of the EC mandate for the review.

The EFSA guidance has a 7% tolerance level on statistical certainty relating to impacts - in other words an up-to 7% impact on bee populations from each pesticide would be under the radar pre-approval. Only a few pesticides with a 7% population impact would need to be approved before bee populations are again being driven towards extinction by pesticides. We were therefore appalled at the suggestion that the guidance might be weakened to the point that the approval process would sanction pesticides capable of having a 20% impact on bee populations.

Please do not be distracted by claims that the costs of the science would inconvenience the pesticide industry, they should simply redirect some of the £10s of millions that they spend every year on influencing and lobbying (£13 million in 2016 spent trying to discredit the International Agency for Research on Cancer alone).

Yesterday’s announcement of a review process by EFSA that will last at least two years is a significant victory for the pesticide industry, enabling them to potentially push through approvals of bee-harming pesticides over the next few years (it would be naive to think that there won’t be further prevarication by Member States and a phased implementation process). To avoid the continued approval of bee harming pesticides we ask the UK to make a policy commitment to only approve new uses of pesticides in the UK where the pesticide has passed the tests in the 2013 guidance.

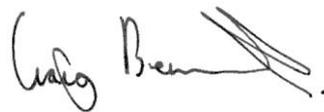
Everyone agrees that the current situation does not protect bees, so we call on you to enforce the full application of EFSA's 2013 bee guidance to UK pesticide approvals until the revised EFSA guidance is fully implemented. This would be a sensible application of the precautionary principle and compliance with Regulation 1107/2009; while failure to apply any updated standards would render the much celebrated ban on imidacloprid, clothianidin and thiamethoxam meaningless - the lesson won't have been learnt.

Bees are wonderful animals that are indispensable for our food production. They pollinate over 75% of food crops globally, including the health promoting fruits, vegetables and nuts. Having more bees and a more diverse bee fauna will secure farm yields and income. The elimination of pesticides that pose a direct risk to bee populations, and other important taxa, is a crucial and achievable goal that both the UK and the EU should consistently pursue.

Yours sincerely,



Matt Shardlow
CEO Buglife



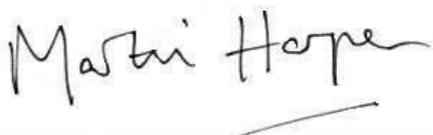
Craig Bennett
CEO, Friends of the Earth



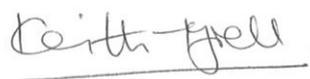
Hannah Lownsborough,
Executive Director, SumOfUs



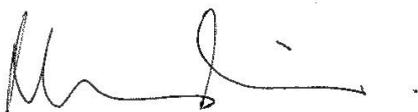
Gill Perkins, TBC
CEO Bumblebee Conservation Trust



Martin Harper,
Global Conservation Director, RSPB



Keith Tyrell TBC
Director, Pesticide Action Network



Margaret Murdin
President, British Beekeepers Association



Helen Browning TBC
CEO, Soil Association