

The British Beekeepers Association

BBKA – supporting bees and beekeepers



23rd January 2013

Dear Member

The BBKA has been awaiting the publication of reports from the European Food Standards Authority on the risk of three neonicotinoid insecticides to honeybees, bumble and solitary bees.

These reports have now been published and the attached statement sets out our understanding of the situation and our expectations of the government and regulatory authorities to ensure the safety and well-being of our honeybees.

We will be closely monitoring their actions and making representations where appropriate.

I would be grateful if you could make the statement available to all your members. It can also be read on the BBKA website.

Yours sincerely

A handwritten signature in blue ink that reads 'David Aston'.

Dr David Aston NDB
Chairman BBKA

23 January 2013

Statement re EFSA reports

On 16 January 2013 EFSA (European Food Safety Authority) published three reports, the preparation of which had been requested by the European Commission to assess risks associated with the use of the neonicotinoid insecticides clothianidin, imidacloprid and thiamethoxam. The assessments concentrated on the use of these insecticides as a seed treatment or as granules with particular regard to their acute and chronic effects on bee colony survival and development; their effect on bee behaviour and the risk posed by sub-lethal doses.

The brief was to cover honey bees, bumblebees and solitary bees however there is very little data relevant to bumblebees and solitary bees with the majority of the information used in the risk assessments having been derived for honey bees. The BBKA's principal interest is in honey bees nevertheless it is concerned about the fate of all pollinators, including bumble and solitary bees; the lack of data and the potential effects of the three insecticides on them is a cause for concern.

It should be noted that the brief given to EFSA appears not to have included the use of the substances in products used by amateurs e.g. in gardens. Thiomethoxam is used in garden products in the UK.

The risk assessments considered three main routes of exposure and noted the following conclusions:

- **Exposure from pollen and nectar.** Only uses on crops not attractive to honey bees were considered acceptable.
- **Exposure from dust.** A risk to honey bees was indicated or could not be excluded, with some exceptions, such as use on sugar beet and crops planted in glasshouses, and for the use of some granules.
- **Exposure to guttation fluid produced by treated plants.** The only risk assessment that could be completed was for maize treated with thiamethoxam. In this case field studies show an acute effect on honey bees exposed to the substances through guttation fluid.

All of the above is quoted from the [press release issued by EFSA](#).

The reports are full of data and interpretations of the data and the conclusions summarised above, however they only give a part of the picture. The sentence 'only uses on crops not attractive to honey bees were considered acceptable' is not reproduced as such in the conclusions of the assessments for any of the three substances. This needs clarification. **more.....**

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The assessments identified data gaps and because of these data gaps the evaluations could not be completed for some aspects. It should be recognised that as and when these data gaps are filled there may be no risk of exposure for the parameter being risk-assessed.

So what happens next at the EU level? The reports will be considered by the European Commission which will decide whether there needs to be a proposal to change aspects of the regulation of these substances at the EU level. The EFSA reports have identified data gaps and presumably new research work will need to be carried out. The EFSA reports contain much information which has been generated in European countries other than the UK.

The EFSA reports all comment on the difficulty of extrapolating data from monitoring work done in any one country because it may not reflect the practices and conditions in other countries.

So where does this leave us in the UK? Some studies, including field studies on the levels of exposure found in crops in field conditions have already been completed and some are due to be completed very soon. These results will be examined by the Advisory Committee on Pesticides (ACP) and their advice on the evidence will be considered by Ministers. If it is concluded that restrictions on the use of neonicotinoids are necessary we are assured by the Chemicals Regulation Directorate (CRD) that these restrictions will be introduced.

The reports indicate the following authorised uses of the three neonicotinoids in the UK. Note this does not include amateur (garden) uses.

Substance	Crops	Product Name
Clothianidin	Cereals (wheat, barley, oats, rye triticale , durum wheat)	Deter
	Maize	Poncho
	Sugar beet, fodder beet, beet seeds	Poncho Beta
Imidacloprid	Cereals (winter wheat, winter barley, oats)	Tripod Plus
	Sugar beet, fodder beet, beet, mangolds	Gaucho
Thiamethoxam	Mustard	Cruiser OSR
	Oil seed rape	Cruiser OSR
	Sugar beet, fodder beet, beet	Cruiser SB
	Fodder rape	Cruiser OSR

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Oil seed Rape is the most likely crop in the list above which has the greatest potential for honey bees to forage on in the UK and it is important that the data gap identified by the EFSA reports on the potential for exposure from the nectar or pollen of treated plants is filled as quickly as possible. This will help give beekeepers reassurance that there is little or no risk, or in the event that an unacceptable risk is identified risk mitigation measures are put into place as soon as possible.

The publication of the EFSA reports on the three neonicotinoids is an important milestone in the assessment of the risk that the substances may cause harm to bees but there is still much work to be done.

The BBKA is awaiting an official reaction from Defra and the CRD to the publication of these reports and will continue to press for urgency in dealing with these matters. The additional field research, shortly to be examined by the ACP, is an important part of this process. Work must be undertaken as soon as possible to fill the principal remaining gaps in our knowledge. It is necessary to fully understand the level of risk and put into place any further risk mitigation measures, however stringent, to protect our honey bees and other pollinators.

David Aston, NDB, Chairman BBKA

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