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Suspension of the use of three neonicotinoid pesticides

Send a letter to your Minister

..... March 2013

Dear Minister,

I am writing to urgently request that the state of (xxx) at the very least supports the European Commission (EC) proposal for a two year suspension of the use of three neonicotinoid pesticides, when it is voted on in Brussels on 15th March 2013. You should be aware that in fact a total ban would be more appropriate and in line with European law, given the mounting scientific evidence of the damaging effects on pollinating insects, due to the widespread use of neonicotinoid pesticides in the EU.

In fact the EC's proposal is a bare minimum: indeed, experts are concerned that after a two year ban of the three specific pesticides, bee populations will not have recovered sufficiently. This is because of the persistence of the chemicals in the agro-ecosystems and the continued medium-term exposure of non-target insects such as bees to the chemicals: this is why only a full ban makes sense eco-toxicologically. Anything less than a full ban could lead to pesticide manufacturers claiming that the use of neonicotinoid pesticides is not at all related to bee mortality. By spreading uncertainty via apparently "science based" arguments [1], the agro-chemical companies are acting as "merchants of doubt" and are therefore blocking effective action by European policy makers.

As reflected in the common letter to commissioner Borg of January 30th, co-signed by 90 MEP's from five political groups, there is wide political and public support for the EC's proposal [2]. On 21 January a petition from a wide range of beekeepers' associations was heard in the Petitions Committee of the European Parliament, calling for a full ban on neonicotinoid pesticides. Furthermore, over 2.5 million citizens have signed the Avaaz petition [3] in support of this same demand.

European Greens fully recognise that the use of neonicotinoid pesticides is not the only factor of bee mortality, as reflected in their resolution (A7-0359/2011) of the European Parliament of November 2011. Banning the use of neonicotinoid pesticides on only honeybee-attractive crops would be a good step forward but would certainly not solve the problem of the loss of pollinators. Although policy makers can't combat for example climate change or other contributing factors in the short term, what they can do is halt the widespread use of these specific pesticides: this is currently the most practical and effective policy measure that politicians can take.

You will be aware that on 16th January 2013, the European Food Safety Authority (EFSA) published three reports on the toxicity risk to bees and other pollinator species of the neonicotinoid insecticides imidacloprid, thiamethoxam and clothianidin. The Authority's conclusions are clear: neonicotinoids pose a high risk to bees, either by the presence of these insecticides in nectar and pollen, by the dust produced when sowing coated seeds or by toxic exudates produced by treated plants. EFSA recommended that the three "highly toxic" actives in question be subjected to a much more rigorous regulatory assessment. In response, the EC has proposed to suspend the use of these three substances on crops attractive to bees, namely sunflowers, oil seed rape, maize and cotton, across the EU as a precautionary measure starting no later than 31st July 2013.

EFSA's report was followed by a report on 23 January from the European Environment Agency on precautionary principle [4], in which imidacloprid is said to "particularly fit to the precautionary principle". The report explains the failures of the European and national risk assessment and monitoring systems that have permitted neonicotinoids to harm bees for a long period (almost two decades).

Pesticide Regulation 1107/2009 states that no pesticide can be authorised if it has a harmful effect on bees (Art. 4 (2b)). The aim of this regulation is to ensure a high level of protection of the environment (Art. 1(3)) and the basis of this regulation is the application of the precautionary principle (Art. 1(4)). Nevertheless, today, neonicotinoids are still authorised and you have, until now, excluded a ban on these specific products. Art.1 (3) states that 'the purpose of this Regulation is to ensure a high level of protection of both human and animal health and the environment and to improve the functioning of the internal market through the harmonisation of the rules on the placing on the market of plant protection products, while improving agricultural production'. Art.4 (2). says that 'the residues of the plant protection products, consequent on application consistent with good plant protection practice and having regard to realistic conditions of use, shall not have any unacceptable effect on the environment'. Even with data gaps, it remains to be proven that there is no unacceptable effect: therefore following the precautionary approach, the ban is justified.

One reason the EC has not applied the precautionary principle so far, is the presumed economical cost that a ban on neonicotinoids would represent. These claims are based on a economic desk-study (the highly criticised "Humboldt study") which is being passed off as "science", although it has not undergone a peer review. Italy banned neonicotinoids seed-coating on maize in 2008. However, an Italian scientific study carried out in the Apenet project [5] was able to prove that productivity remained unchanged and that there was no increase in economic damage due to pests, while Italian beekeepers reported a decrease in yearly honeybee colony losses from 50% to around 15% (which is the natural background rate). Far from being a threat to farming, this suspension should stimulate agronomic innovation and encourage farmers to move towards more sustainable agricultural practices, for example crop rotation, which is in line with the aims of the CAP reform.

I believe that in order to safeguard our bees and other pollinators, which supply such a vital service (estimated at least 15 billion euro per year across EU [6], far outweighing the economic losses claimed by industry) and help ensure that we have a plentiful and diverse food supply, that this proposal is long overdue: it is both precautionary and a minimum response. I believe that as politicians we have the obligation to protect and therefore believe that approval for these products should end.

I am therefore asking that (xxx) supports the proposal when it is voted on at the meeting of the Standing Committee on Food Chain and Animal Health (SCoFCAH, section Phytopharmaceuticals) on March 15th.

Yours sincerely,

- [1] www.plightofthebees.com
- [2] <http://www.greens-efa.eu/total-ban-on-the-use-of-neonicotinoid-insecticides-needed-9097.html>
- [3] http://www.avaaz.org/en/hours_to_save_the_bees/?gpme
- [4] <http://www.eea.europa.eu/publications/late-lessons-2>, see part B Section 16
- [5] http://www.reterurale.it/downloads/APENET_2010_Report_EN%206_11.pdf
- [6] European Biodiversity Strategy -
<http://ec.europa.eu/environment/nature/info/pubs/docs/brochures/2020%20Biod%20brochure20final%20owres.pdf>

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