

RSPB position statement on neonicotinoids

Summary

Pesticides are currently an important tool for farmers and other land managers in managing unwanted insects, weeds and other pests, but should be viewed and used as just one part of a toolkit of sustainable pest management methods, and only as a last resort.

Neonicotinoids were intended to be safer for people and wildlife than earlier pesticides but there is mounting evidence that they contaminate the wider environment and can pose a threat to a range of wildlife.

The RSPB is calling for the EU moratorium on neonicotinoids to be expanded to cover all agricultural uses (not just flowering crops). The European Commission should publish a clear plan stating how evidence will be gathered to guide a decision on if or how neonicotinoids may be used in the future. The moratorium should be continued for as long as it takes to gather this evidence.

The withdrawal of neonicotinoids will pose significant challenges for some farmers who currently use them. Government, scientists and the farming sector must work together to support farmers in a transition to more wildlife-friendly methods of pest management.

The EU risk assessment process must be overhauled to take account of the latest evidence on potential impacts of pesticides. Monitoring of pesticides in the wider environment, including cumulative impacts, must be stepped up.

The RSPB will continue to work with government and the industry to reduce environmental harm from pesticides. We will do this through research, by demonstrating best practice on our own land, through advice to farmers and by working to influence Government policy.

The RSPB's views on pesticides

The RSPB recognises that pesticides can be useful to farmers and other land managers in controlling unwanted insects, weeds and other pests. Farmers need to manage pests so they can get decent returns from their businesses, through producing reliable good yields of high quality crops for food, fuel and fibre. Pesticides can be an effective tool to help them do this.

However, because pesticides can have damaging effects on other wildlife, water quality and human health, we believe that they should only be used as a last resort. The RSPB is a strong supporter of more sustainable, wildlife-friendly farming methods and we work with government and industry to reduce unintentional damage from pesticides.

We do this through research, by demonstrating best practice on our own land, through advice to farmers and by influencing Government policy.

What does the RSPB think about neonicotinoids?

When neonicotinoid seed treatments came onto the market about 20 years ago, they were presented as a safer, more targeted alternative to older pesticide sprays. They are very highly toxic to insects, but because they are applied directly to the seed it was believed that only pests eating the crop would be exposed to them. Many farmers have incorporated neonicotinoids into their pest management

programmes in the belief that they are better for wildlife than older sprays. The RSPB itself has occasionally used neonicotinoids in the past.

However, there is now a substantial body of evidence that suggests that neonicotinoids can harm non-pest insects, especially bees. Experiments have shown that extremely small doses of neonicotinoids can be enough to cause behavioural changes and death of insects. Evidence is beginning to emerge that neonicotinoids can contaminate soils, water and non-crop vegetation, where they may affect pollinators and other wildlife. An international group of independent scientists has recently reviewed the evidence on neonicotinoids and another insecticide called fipronil. In September 2014 they concluded that these systemic insecticides (neonicotinoids and fipronil) are present in the environment at levels that can potentially harm a wide range of species, and predict “substantial impacts on biodiversity and ecosystem functioning.” A more detailed briefing is available on the RSPB website.

The RSPB is extremely concerned by this emerging evidence, which comes from a broad suite of independent and scientifically rigorous studies. We believe urgent action is needed from all parties involved in agriculture including government, farming unions, pesticide manufacturers and the research community. We also believe that action on neonicotinoids must be accompanied by a wider plan to reduce pesticide use. Nature-friendly farmers across the UK seek to protect and encourage beneficial wildlife because they realise just how important these species are for our future food production capacity. We need to produce food today in ways that doesn't compromise our ability to produce food in the future, and that means protecting pollinators and other farmland wildlife.

What's our position on the EU measures to restrict neonicotinoid use?

The European Commission put in place restrictions on three of the major neonicotinoids, starting from December 2013. Under these rules, these chemicals can only be used on crops that do not attract pollinating insects, and may only be used by professionals (so, for example, gardening products sold to the public will no longer be allowed to contain these chemicals). These restrictions apply in all EU member states and will be reviewed when more information is available, and at latest by December 2015.

We welcomed this decision by the European Commission as an important first step towards safeguarding pollinators. However, we are concerned that there appears to be no co-ordinated activity to monitor the effects of the ban, nor a concerted research effort to fill the gaps in understanding of the risks posed by neonicotinoids. Furthermore, the restrictions reflect only the evidence that was available in early 2013, which was largely on pollinators, and do not take account of the significant research findings since then.

The RSPB recognises that restrictions on neonicotinoid use pose real challenges for some farmers. These farmers should be given support and advice to adopt methods of managing pests successfully without using neonicotinoids, in ways that are safe for wildlife and the environment. There is a wealth of experience to draw upon, from the organic sector and from conventional farmers who do not use neonicotinoids; including in countries such as France and Italy where there have been restrictions in place for some years. Over the last 15 years the RSPB itself has gained some experience of growing crops both with and without neonicotinoids on Hope Farm which has contributed to our understanding of the challenges facing farmers.

The RSPB is calling for the following actions:

- The EU restrictions should be broadened to include *all* agricultural uses of the 3 main neonicotinoids (i.e. to include use on cereals, not just on insect pollinated crops). We believe

this is a necessary precautionary measure to protect wildlife until the evidence gaps can be filled. Halting all agricultural use of neonics except for research purposes will also enable more sensitive field studies to be carried out by creating neonic-free control areas.

- The European Commission, working with Member States, should publish a clear plan for gathering and analysing the necessary evidence to make a decision on future use of neonicotinoids. As well as environmental impacts, questions include whether risk mitigation measures that were a condition of the original authorisation of neonicotinoids are actually being followed. For example, the risk to seed-eating birds was assumed to be small because farmers are required to bury treated seeds; but in reality it is nearly impossible to guarantee that no seeds are left lying on the soil surface.
- The moratorium should not be limited to 2 years but must be continued for as long as is needed to gather the data. Chemical companies, government scientists and independent researchers need to work together to identify and resolve the key points of disagreement around the impacts of neonicotinoids. This will require greater transparency and sharing of information.
- Research is also needed to establish whether neonicotinoids are cost-effective for farmers: does using neonicotinoids actually increase crop yields; would alternative measures achieve this more cheaply or effectively?
- The EU process for assessing risks of new pesticides must be urgently overhauled to take into account latest evidence on indirect, chronic and cumulative impacts of some pesticides.
- UK government should significantly increase monitoring of pesticides (including neonicotinoids in the absence of a complete ban) in water and soils, and in growing crops and field boundaries.
- Increased funding should be made available for wildlife-friendly farming and there should be more research into the full impacts of farming techniques on our wildlife populations.
- Government and industry must work together to reduce agriculture's reliance on pesticides and promote farming practices that do not cause loss of biodiversity. This should include specific advice to farmers on how to manage the transition away from neonicotinoids. A high priority should be placed on developing and promoting safe alternatives, both chemical and non-chemical, to neonicotinoids.

The RSPB pledges to:

- Continue to monitor and contribute to the emerging science.
- Continue to work with government and the industry to reduce unintentional damage from pesticides. We will do this through research, by demonstrating best practice on our own land, through advice to farmers and by working to influence Government policy.
- Continue our policy of not using of neonicotinoids on RSPB land (except for research purposes).
- Raise awareness of the concerns around neonicotinoids and other pesticides among our members and supporters, particularly through our advice on wildlife-friendly gardening.
- Continue to keep RSPB's policies on neonicotinoids under review as the evidence develops.