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Sent: Thu, 14 Apr 2011 18:12:53 +0100
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Subject: bijen imi

PRODUCTS: ADMIRE & ADMIRE O-TEQ

A cage study with flowering *Phacelia tanacetifolia* (5.1.2.e 2001, MO-01-022345 (KIIIA1 10.4.4 of dossier D-005083-01) submitted for Admire Pro) is available. We do not agree to the conclusion stated in the evaluation of Ctgb as the NOAER (No Observed Adverse Effect Rate) is 14 g a.i./ha.

The background of this conclusion can be found both in report MO-01-022345 and in M-386360-01-1 on page 73/73 (MIIIA1 Sec 6 of dossier D-005083-01) submitted for Admire Pro):
"**Risk posed to honeybees in off-field habitats**
To assess potential effects of spray drift deposits and off-crop contamination of flowering plants adjacent to the treated area, a multiple rate cage tests with Imidacloprid SL 200 was performed. In this study with small bee colonies kept in cages with flowering *Phacelia tanacetifolia* (5.1.2.e 2001, KIIIA 10.4.4/01) it was demonstrated that when Imidacloprid SL 200 is applied during bee flight, rates of 0.6 and 1.2 g a.s./ha had no effects on foraging activity. Rates of 2.0, 4.0 and 9.0 g a.s./ha reduced foraging activity for one day and a rate of 14 g a.s./ha reduced foraging activity for two days. None of the tested rates in this study had any effect on mortality. As such, it can be concluded that a drift rate of 14 g a.s./ha can be considered to be a NOAER (No Observed Adverse Effect Rate) for imidacloprid in honey bees."

Based on this information it is clear that the only effect that has been shown in the study is a repellency effect of imidacloprid to bees. Because the study is performed in a cage, the bees could not search for their food somewhere else and therefore there is some small decrease in flight movements.

Changing the maximum acceptable concentration from 1.2 g a.i./ha to 14 g a.i./ha will improve the situation for Admire/Admire O-TEQ significantly as is shown in the table below:

Use	Appl. Rate	Max. acceptable conc.	Required drift rate	Available drift reducing measure
	[g/ha]	[g/ha]	%	
Apple/pear	105	14	13	Several options available; we should check how we can combine drift reducing measures of water, with drift reducing measures of off-field
Flower bulbs/bulb flowers	70	14	>10	Not necessary
Floricultural crops, tree nursery & perennials	84	14	>10	Not necessary
Tree nursery, high plants	84	14	>5.6	Not necessary

Met vriendelijke groet, Best Regards

5.1.2.e
I am not available on friday. BE AWARE THAT MY E-MAIL ADDRESS CHANGED INTO:
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