From: "5.1.2.e (5.1.2.e)"
Sent: Mon, 24 Sep 2012 15:02:58 +0100
To: "5.1.2.e (5.1.2.e)" <5.1.2.e>; "5.1.2.e (5.1.2.e)" <5.1.2.e>; "5.1.2.e (5.1.2.e)" <5.1.2.e>; 5.1.2.e (5.1.2.e)" <5.1.2.e>; 5.1.2.e (5.1.2.e)" <5.1.2.e>; "5.1.2.e (5.1.2.e)" <5.1.2.e>
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Subject: CRD (Fera, DEFRA) conclusies openbare literatuur bijen neonics in lijn met Ctgb conclusie
Attachments: pb13818-neonicotinoid-bees-20120918.pdf

Dag allen,

Ter info: DEFRA (Engelse toelatingsautoriteit) heeft vorige week een statement gepubliceerd waarin ze recente openbare literatuur over neonicotinoiden en bijen becommentarieren. Net als wij komen ze tot de conclusie dat ingrijpen in toelatingen momenteel niet gerechtvaardigd is en dat ze de ontwikkelingen in Europa (nieuwe guidance en Europese herbeoordeling van neonics) afwachten.

Hun onderzoeksinstituut FERA is bezig met een paar studies om bepaalde effecten nader te onderzoeken, resultaten worden half 2013 verwacht.

Groeten,
5.1.2.e

PS Hieronder een paar highlights (die Bayer natuurlijk meteen heeft doorgestuurd).

Van: 5.1.2.e [5.1.2.e@bayer.com]
Verzonden: 24 September 2012 08:40
Aan: 5.1.2.e (5.1.2.e) (MinEL&I); 5.1.2.e (5.1.2.e) (MinEL&I); 5.1.2.e (5.1.2.e)
Onderwerp: CRD (Fera, DEFRA) conclusies Henry, Whitehorn, Pettis, Lu publicaties in lijn met CTGB conclusie

Beste 5.1.2.e 5.1.2.e

Ter info de vorige week gepubliceerde conclusie van de Engelse overheid n.a.v. de bijen en hommel studies begin dit jaar.

Consideration by CRD and Fera

CRD and Fera views are outlined in **Annex 1**. On the papers listed in paragraph 6 above, the key observations are as follows:

The **Henry *et al*** study provides information regarding the potential adverse effects of thiamethoxam on the foraging behaviour and resulting survival of honey bees. Due to the artificiality of the test design and dosing regime, there are uncertainties regarding the risk in a more realistic field exposure situation. As part of the regulatory assessment, an extensive dataset on the potential effects of thiamethoxam on honey bees when used as a seed treatment on oilseed rape was considered. This included multi-year / multi-site field trials which indicated an acceptable risk.

As bumble bees are not considered under current EU pesticides law (see the future plans at paragraph 18 below), it is more difficult to assess the significance of the findings of the **Whitehorn *et al*** study. It may be significant that the control bees
consumed nectar and pollen whereas the treatment bees were given a different diet of treated pollen and sugar water. The key question for this study is how far it illuminates the likely real situation at field level - are the exposure and the resulting effects seen under normal conditions?

Taking the **Pettis *et al*** study at face value it can be concluded that exposure to imidacloprid may result in higher levels of Nosema. The following points require consideration in trying to interpret this study: whether factors such as exposure are in line with field situations; the significance at the colony level; the variability of *Nosema* spore count appears to be high; and the use of bulked and uneven samples. In order to determine if there is a real concern regarding the risk to honey bees that may be infected with *Nosema* from the consumption of pollen/nectar treated food, it would be necessary to carry out studies under more realistic conditions.

The **Lu *et al*** study does not raise new concerns in respect of the impact of neonicotinoids on bees. The doses chosen are unrealistically high for exposure of bees from treated flowering crops; the food source chosen is not in significant use in the UK and the residues used are not related to any assessment of those actually present; and it is not clear whether the effects seen are in fact similar to those of Colony Collapse Disorder (which is, in any case, not encountered in the UK).

CRD's overall conclusion was that the studies identify issues but do not justify the imposition of further restrictions on neonicotinoids at this stage. Rather, the findings to date call for continuing investigation and the development of the regulatory risk assessment process. CRD's analysis was fed into the subsequent examination by the ACP.

Met vriendelijke groeten / Best regards,

5.1.2.e
5.1.2.e

Bayer CropScience

Science For A Better Life

Bayer Crop Science SA-NV
Development & Registration
Energieweg 1
3641 RT Mijdrecht, Netherlands
Tel: + 5.1.2.e
Mobile: 5.1.2.e
Fax: + 5.1.2.e
E-mail: 5.1.2.e @bayer.com
Web: http://www.bayer.nl
