

# The British Beekeepers Association

*BBKA – supporting bees and beekeepers*



F.A.O: BBKA Member Associations

4<sup>th</sup> March 2013.

Dear Secretary,

There continues to be substantial media coverage of honey bees and other pollinators which is to be welcomed. A number of campaigns have been launched recently, designed to 'help' bees. There is a risk that these campaigns may confuse the issue. The Government has a clearly articulated policy for honey bees in the form of the Healthy Bee Plan, launched by Defra in 2010. The BBKA contributed substantially to the development of this plan which has a ten year trajectory and continues to support it by our presence and contribution to the work of the Bee Health Advisory Forum and its sub-groups. Thus whilst sympathetic to many of the objects of current campaigns the BBKA does not feel it appropriate to align itself directly with them.

Specifically on the topic of neonicotinoids there is talk of European bans and lots of activity by the European Commission, the European Parliament, national governments, organisations claiming to represent beekeeping and various non-governmental organisations. A number of petitions have been circulating seeking signatures to 'save the bees'. In order to help inform members on developments in this area and to decide whether or not it is appropriate to support these petitions as individuals, I would like to take this opportunity to summarise the current situation in the UK, which of late has gained pace, and the BBKA's position on this topic.

In January 2013 the European Food Safety Agency (EFSA) published its findings of a risk assessment carried out on three neonicotinoids and their risk to honey bees, bumble bees and solitary bees. It seems many commentators rushed into print without checking to see if the press statement made by the EFSA actually reflected the content and conclusions of the report. Regrettably the English language press statement is not a true reflection of the reports.

The European Commission subsequently drew up plans to introduce a two year ban on the use of the three neonicotinoids and this was to have been voted on at a meeting of the European Council-Agriculture and Fisheries meeting earlier this week. In the event no vote was taken as there were differences in opinions between the Member States, the vote was postponed to the next Council meeting, later in March.

It should be noted that the EFSA report was a risk assessment report for the European Commission, whilst the responsibility for the risk management of the products is a national matter for each individual Member State.

In the UK, the Environmental Audit Committee (EAC) is conducting an inquiry into insects and insecticides with the subtext of neonicotinoids and the effectiveness of the regulatory control of the placing of these products on the market and their use. The UK position was described during the final oral evidence session at the EAC Hearing on 27<sup>th</sup> February 2013 (to hear the full text of the evidence and their response to questions from the EAC you can go the website; [www.parliament.uk](http://www.parliament.uk) and follow the links to the Environmental Audit Committee). Lord de Mauley (Defra Minister), Professor Ian Boyd (Chief Scientific Advisor to Defra) and Dave Bench (Director of Science, Analysis and Chemicals Regulation, Health and Safety Executive) were the witnesses at this final session. In terms of the UK, Professor Boyd was quite unequivocal that there was no evidence in the UK of harm

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to honey bees being caused by neonicotinoids and in terms of the 'evidence' brought forward in Europe there was no compelling evidence to support the proposed restrictions.

One aspect of the BBKA's position with regard to pesticides is to seek to ensure that all parties recognise the differences between honey, bumble and solitary bees and understand that their risk profiles differ. We are not convinced that it is possible to easily extrapolate data from bumble bees to honey bees and, this is of concern. Defra has several research projects in progress which are aimed at shedding further light on the situation in the UK. As previously stated, members should be in no doubt that if valid evidence is brought forward of harm caused by neonicotinoids to honey bees in the UK we will insist that the Government takes appropriate and adequate measures to mitigate the risk and we will continue to apply pressure to ensure the measures are effectively implemented. We expect the UK regulatory body, the Chemicals Regulations Directorate, to do its job effectively and transparently at all times.

The BBKA accepts, however reluctantly, that farmers will continue to use pesticides in maintaining sufficient supplies of quality food produce. As in the past, we seek to ensure that those agents used are properly applied and that the highest standards of stewardship are adopted. Any ban or suspension of existing approved pesticides must itself be subject to risk assessment to ensure that the pesticides used in place of forbidden substances are not more damaging than the banned products. In short, we do not wish to see older more dangerous chemistries substituted for banned products.

Whatever happens to neonicotinoids in the UK, we must still ensure that wherever pesticides are used, be it in agriculture or gardening, there is a justification for their use and that there is no harm to honey bees in their correct use. The recent publication of the UK National Action Plan on the Sustainable Use of Pesticides sets out the framework within which we will be able to represent the interests of honey bees (go to; <http://www.defra.gov.uk/publications/files/pb13894-nap-pesticides-20130226.pdf>)

Finally, I would like to deal with the continuing inaccurate, misleading and libellous comments made about the BBKA concerning the involvement of the Association with the crop protection industry. But, before I state the current position, I need to give a historical perspective. In the late 1980s there were unacceptable losses of honey bee colonies to crop spray damage and action had to be taken. Part of this action involved changes in legislation and the control of the use of pesticides. The BBKA was instrumental in including warnings and guidance in the Pesticide Handbook, still current to this day. By engaging with the manufacturers, the BBKA sought to direct farmers towards the use of alternative pesticide products which had improved profiles relating to human health and the environment. In order to help farmers to identify and promote use of these less damaging products, with good levels of stewardship support, the BBKA licensed the use of its logo on a selected group of four products, all synthetic pyrethroids. The BBKA reviewed technical information on the products, and then made recommendations regarding their use based on the BBKA's expertise in beekeeping. Considerable work was done by the BBKA to satisfy itself that products which were to carry the BBKA logo would indeed significantly reduce the incidence of spray damage to honey bees. This turned out to be the case and the numbers of spray incidents reduced significantly to today's minimal level. The time and costs incurred by the BBKA and its volunteer experts were considerable and it was decided that the companies whose products were to benefit from the use of the BBKA logo should pay a modest licence fee for its use. This scheme yielded clear

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and significant benefits to the honey bee and focussed the crop protection industry's attention to the need to effectively steward the use of their products.

Over time, new products were introduced and the four pyrethroid products were superseded largely by the neonicotinoid products. By 2010 it was clear to BBKA Trustees that, whilst the vast majority of the BBKA membership wished it to continue its engagement with the industry, a small but significant minority of the membership was unhappy that the BBKA, in receiving money from these companies, gave the wrong impression of its involvement with them. The licences for the use of the BBKA logo were therefore, revoked. Thus since 2010, the BBKA has not received any money from the crop protection industry for the use of its logo nor does it permit the use of its logo on crop protection products and this continues to be the case. For the sake of clarity, the BBKA has **never** endorsed the neonicotinoid products. Regrettably many of those who criticise the BBKA may be unaware of the history and equally so, of the benefit that has accrued to honey bees through its work to minimise the potential for harm that pesticides may inflict. There may also be those who choose not to be aware of these facts for their own devices.

I trust this letter updates you on the key aspects of the neonicotinoids situation and please be reassured the BBKA is very actively representing the interests of the honey bees and beekeepers. More updates and information will be posted on the BBKA website and included in the BBKA News in due course.

**I would be very grateful if you could circulate this letter to all your members.**

Yours sincerely,

Dr. David Aston NDB  
Chair BBKA Trustees