Bayer CropScience

Commissioner John Dalli
Health and Consumer Policy
European Commission
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CC: Commissioner Antonio Tajani
Commissioner Janez Potocnik
Commissioner Máire Geoghegan-Quinn

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**Intention of the French Minister of Agriculture to suspend a highly effective and innovative seed treatment product and the political debate around it**

Dear Commissioner Dalli,

We are writing to you today to express our concerns about a new political debate about the effect of certain seed treatment compounds on bee health, which we believe is not at all based on scientific evidence.

Seed treatments are a standard technique today and the vast majority of commercially sown seeds are treated with products to protect them from early damage by both fungi and insects. Seed applied pesticides are the most targeted form of application which minimizes the area treated – by a factor of 100 - while contemporaneously providing highest protection of the sensitive crop seedlings against soil pests which are difficult to control by other types of applications. Thus seed treatment represents by far the environmentally safest and technologically most modern form of crop protection.

During the past years there have been a number of incidents which have had an effect on honey bees – but almost all of them were a result of inappropriate use and/or lack of application precaution. Such incidents have since been reduced to a minimum due to very strict stewardship measures, as introduced by the European Commission in 2010 and further elaborated between the industry and the European Seed Association.

As a result of this intensive stewardship program, seed treatment quality has improved year-by-year with record qualities in 2012. We would very much appreciate if the Commission could support these additional joint efforts to implement the strict stewardship directive swiftly and appropriately.

Please be reassured that for our company the safety of bees is a top priority. Since the unfortunate accident in the south-west of Germany a few years ago we are heavily investing into research, machinery development and stewardship measures in this regard.

Your own services have come to the conclusion (12/2010) that the bee health problems in Europe are a multifaceted issue with pesticides being only one of a number of potential causes.

The by far most important factor influencing bee health is the *Varroa* mite, a parasite affecting mainly the European honey bee. For many years Bayer has been investing into research to develop treatments for this and other destructive pests, and we have developed a number products and techniques for bee keepers now on the market or under official evaluation.

On the other hand there is no reliable data available from which one could conclude a serious threat to European bee populations – this was exactly the reason for which a pilot surveillance program and the EURL for bee health were initiated.

The EU parliament came to very similar conclusions in their latest related resolution (11/2011) as well as the Council (4/2011).

There have been huge amounts of data generated on the subject of neonicotinoid insecticides before and since; none has yet supported a significant threat to a honey bee population under practical use conditions. Most of them lack a reference to what would be the alternatives of these highly active seed treatments. In the end, for farmers to produce high quality affordable food, they need to control pests and diseases. The alternative to seed treatments is foliar or soil applications, which will cover a much greater surface and will sometimes require repeated applications. Seed treatment is hence the most targeted application.

We are committed to do the utmost to ensure the safe use of our products, by constantly improving the technology and by significantly increasing the stewardship and safe use measures in the market, together with the seed industry and the farmers. The creation of our new Bayer Bee Care Program as a platform for joint projects with scientists, beekeepers and farmers is a visible token of that.

We would very much appreciate to have the full support of the Commission to have all member states implementing those measures as soon as possible to reduce all environmental risks to a minimum.

Dear Commissioner Dalli, we trust that with regard to any regulatory actions you will take into account the broad scientific basis and the vast experience which farmers have gathered with these compounds over the years without any specific honey bee problem. We are committed, together with member states and the Commission, to develop and implement all necessary measures to prevent any avoidable negative impact on the environment and to have the best available solutions for the European farmers.

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