

LE/12/AM/21899  
13 June 2012

European Commission  
Commissioner John Dalli  
Rue de la Loi 200  
1049 Brussels



Subject: Possible suspension of certain insecticidal seed treatment applications

Dear Commissioner Dalli,

ECPA is following with great concern the recent developments regarding neonicotinoid (CNI) seed treatments at EU level, including the recent request by France for a suspension of certain seed treatment uses.

The recent EFSA and ANSES evaluations have confirmed that while recent studies have linked bee mortality to exposure to neonicotinoids, these studies have not been based on realistic scenarios. We fully support the principles set out in Regulation 1107/2009 that a plant protection product should be evaluated "*having regard to realistic conditions of use*" and we believe that any decision on the future use of plant protection products should be based on this principle.

Seed treatments, including neonicotinoids, represents one of the most efficient and environmentally friendly delivery systems for pesticides for certain crops and pests. Less than 1% of a given area is treated compared to a spray application, only insects that feed on the plants are exposed; and potential drift exposure to water bodies and beneficial insects is reduced. Water use, fossil fuels (and therefore greenhouse gas emissions), are reduced as the number of tractor operations is reduced. And furthermore, they form part of the toolbox in pest resistance management.

The loss of neonicotinoid seed treatments could have an impact on yields with potential losses of up to 10% in oilseed rape and cereals, 30% in sugarbeet and 50% in maize.

An immediate suspension would also have a serious impact for the coming sowing season and it could create unnecessary confusion between treated and untreated seeds as well as problems of seed availability. Furthermore, potential consequences in trade with non-EU countries should also be given consideration.

As an industry, we welcome the fact that EFSA is carrying out a detailed evaluation on the use of these seed treatments and we understand that this evaluation will be completed by the end of this year. We believe that it would be wise to await such an evaluation before taking any action. We believe it would also be helpful to carry out an impact assessment which would consider the availability of alternatives, the consequences in alternative scenarios to bee health and important issues such as pest resistance.

A clear distinction needs to be made between individual incidents of honey bee losses and general honey bee population decline. As the Commission stated in 2010, there is no scientifically proven causal link between pesticide use and a general honey bee population decline; other factors are known to be the main contributors of the decline of bee health,


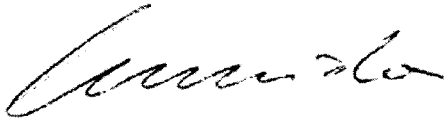
such as Varroa, Nosema and viruses. We appreciate that individual incidences have occurred due to inappropriate use of insecticides and the plant protection industry is conducting a number of stewardship campaigns to prevent such accidents in the future.

We understand the public and political pressure, as we are all concerned about bee health and understand that further research into understanding the impacts affecting bees is needed. But we hope that any decision will be based on EFSA's on-going review, to be based on "*realistic conditions of use*".

We know that you share the opinion that a regulatory framework needs to have consistency, predictability and legal certainty. Therefore we would appreciate if you can consider these suggestions which could avoid setting negative precedents for the future.

Should you require further information, please do not hesitate to contact us.

Yours sincerely,



CC: Commissioners Dacian Ciolos, Máire Geoghegan-Quinn, Karel De Gucht, Director General Paola Testori-Oggi