

Somerset West and Taunton Council

Appeal to reverse UK Government emergency authorisation to use neonicotinoids on sugar beet

Proposed by: Cllr. Dixie Darch

Seconded by: Cllr. Nick Thwaites

Council notes:

1. The granting of emergency authorisation on January 2021 to use the pesticide *thiamethoxam* containing neonicotinoids as seed treatment for sugar beet, applied for by NFU and British Sugar as treatment for the virus yellows disease which is spread by aphids.
2. That this form of neonicotinoid is highly toxic to bees and other pollinators, remaining in the soil for some time after use.
3. That in our view the conditions for authorisation of emergency use, ie *the case for need, limited and controlled use of the product and special circumstances* have not been fully met.
4. That the impact of this short term measure is likely to worsen the long term problem of loss of insects and pollinators on which much of our food production relies, leading to sustained economic losses and a crisis in our ability to grow enough food.
5. That recent research published since January 8, 2021 revealing the alarming global loss of bee species, should prompt a review of this decision and withdrawal of authorisation.
6. That the following organisations, among others, are opposed to this decision: The Wildlife Trust, Friends of the Earth, The Soil Association, Client Earth and Pesticide Action Network.
7. We recognise the concerns of domestic sugar beet farmers who face the threat of newly tariff free imports of sugar cane to the UK market, which may have been produced without concern for environmental welfare.

This council resolves to:

- 1) **write to and lobby both our members of Parliament, urging them to consider repeal of this authorisation pointing out that the Government has stated through DEFRA that protecting pollinators is a priority.**
- 2) **Include in message to MPs a request that they urge government to support domestic sugar beet producers by ensuring all sugar imports are produced, at minimum, to the same environmental standards as apply to UK sugar producers.**

- 3) **Until this repeal is implemented a commitment is given that emergency authorisations will only be given in exceptional circumstances for proven need with tight controls to protect pollinators. Any licence needs to be monitored for compliance.**

SUPPORTING EVIDENCE

Neonicotinoid product as seed treatment for sugar beet: emergency application GRANTED January 8, 2021ⁱ

The National Farmers Union and British Sugar have applied to the UK Government for emergency authorisation to use the pesticide *thiamethoxam* on sugar beet crops in the east of England. Authorisation was approved in January 2021 on the grounds that the 2020 crop was seriously affected by a virus called yellows disease which is spread by aphids. The risk to the 2021 crop is considered to be an emergency.

Thiamethoxam contains neonicotinoids which were banned by the European Union in 2018 because of their toxicity to bees and other pollinators, but permitted for emergency use on application. ⁱⁱ

Why are neonicotinoids so harmful to pollinators?

Not all neonicotinoids are equally dangerous to bees but *Thiamethoxam* is one of the three that are particularly harmfulⁱⁱⁱ. According to Dave Goulson, Professor of Biological Sciences at Sussex University, even minute amounts of neonicotinoids impair bee navigation, reduce egg laying and learning and suppress the immune system. In a study of bumble bee nests, giving bees pollen with as little as 6 parts per billion neonicotinoid resulted in an 85% drop in the number of new queens produced in each nest.^{iv}

This pesticide remains in the soil, a fact acknowledged in the Government document, which states that “the applicant recognised that the persistence and mobility of neonicotinoids in soils could result in residues with the potential to cause unacceptable effects to bees in following crops”.

What are the conditions for emergency authorisation?

An emergency authorisation for the short-term use of a product may be granted if the following requirements are met:

- *the authorisation appears necessary because of a danger which cannot be contained by any other reasonable means (the case for need)*
- *use of the product will be limited and controlled*
- *there are special circumstances^v*

An evaluation of the extent to which these criteria are met

1. The case for need.

This is deemed to have been met on the grounds that the virus “cannot be contained by any other reasonable means” and that “sugar beet yields were significantly reduced in the 2020 season due to the incidence of virus, and similar conditions in 2021 would be likely to present similar dangers.”

It is worth considering the interpretation of “need” here. Clearly a successful crop is important to sugar beet farmers and the rural economy, but does one bad harvest and the prospect of another constitute emergency measures? Sugar is currently taxed because we consume too much with negative effects on our health and the attendant pressure on the NHS. Furthermore, we rely heavily on natural pollinators in our food production and their devastating decline is already impacting on the rural economy. A recent study on Gala and Cox apple production in the UK suggested a loss of £6 million in potential income because fruit quality is impaired by inadequate pollination.^{vi} In the USA, a study in 2020 found that a decline in bees was limiting the supply of some food crops.^{vii} The long term impact on food production as a result of neonicotinoid use for short term gain could lead, not just to more sustained economic losses, but a crisis in our ability to grow enough food.

2. Limited and controlled use

The Secretary of State considered this requirement has been met because of a “reduced application rate for the seed treatment to deliver less of the product to the soil”. However, the Wildlife Trust is not satisfied that this will protect wildlife, arguing that the method of “seed-dressing” which will be used “results in only 5% of the pesticide going where it is targeted, in the crop. The rest ends up accumulating in the soil, from where it can be absorbed by the roots of wildflowers and hedgerow plants, or can leach into rivers and streams where it could harm over 3,800 invertebrate species, which spend at least part of their life cycle in freshwater.”^{viii}

The Government document also cites the following as evidence of controlled use: “the applicant proposed a stewardship scheme which includes several measures to address risks to pollinating insects, underpinned by industry commercial contracting arrangements.” One of these is the spraying of weeds between the beet crop (which is non flowering) with a herbicide, to “protect” pollinators. The Secretary of State has deemed this “acceptable”. However, the Wildlife Trust argue that doing so would “seriously harm already-threatened populations of wildflowers and the insects that depend on them.”^{ix}

3. Special circumstances

This relates to action taken to ensure that emergency authorisation is not long term: a period of 3 years is cited in the document. Actions include “the development of resistant plant varieties, measures to improve seed germination and new practices for growers.” The document does not stipulate what these “new practices” are and

why at least some of these measures cannot be implemented sooner rather than later.

Given that pesticide use kills off natural predators as well as the pests, there is a risk that neonicotinoids may result in a long term reliance rather than a short term solution. Vicki Hird, head of the sustainable food and farming alliance *Sustain*, said, “This derogation to use bee-toxic neonicotinoid insecticide on sugar beet will not be encouraging the industry to develop alternative approaches – using all the tools in the integrated pest management toolkit.”^x

Conclusions

The Government report concludes that, “Evaluation of this application found that potential risks to birds and mammals from eating seedlings from treated seed, and risks to aquatic invertebrates were acceptable. Risks to birds from consuming treated seeds were not demonstrated to be acceptable, but the consumption of pelleted seeds is considered an unlikely route of exposure.” Having considered the evidence and the mitigation measures, the Secretary of State notes that “**aspects of the environmental risk assessment, and particularly the risk to bees, do not fully meet the normal requirements for standard authorisation.**” He concludes, however, that the potential benefit outweighs the environmental risks and permission was therefore granted.

We need to ask if this was the right decision. A series of scientific studies into global insect decline in January 2021 has shown insect decline at a rate of 10% to 20% a decade.^{xi} Scientists analysing data collated by the Global Biodiversity Information Facility found bee species down by 25% since 1990. The study showed a clear global trend of bee decline and, while more data is needed to establish the status of individual bee species, it warns that we cannot wait before acting. Eduardo Zattaro, lead author of the research study said, “The next step is prodding policy makers into action while we still have time – the bees cannot wait.”^{xii}

On the basis of this very recent research evidence there is surely a case for reviewing this government decision.

Dixie Darch, January 2021

ⁱ <https://www.gov.uk/government/publications/neonicotinoid-product-as-seed-treatment-for-sugar-beet-emergency-authorisation-application>

ⁱⁱ *ibid*

ⁱⁱⁱ Goulson, D (2019) *The Garden Jungle*. London: *Vintage*.

^{iv} *ibid*

^v ^v <https://www.gov.uk/government/publications/neonicotinoid-product-as-seed-treatment-for-sugar-beet-emergency-authorisation-application>

^{vi} Goulson, D (2019) *The Garden Jungle*. London: *Vintage*.

^{vii} <https://www.theguardian.com/environment/2021/jan/22/quarter-of-known-bee-species-have-not-been-recorded-since-1990>

^{viii} <https://www.wildlifetrusts.org/news/bad-news-bees-government-reverses-ban-bee-killing-neonicotinoids>

^{ix} **ibid**

^x <https://wickedleeks.riverford.co.uk/news/farming-biodiversity/neonics-back-menu>

^{xi} <https://www.theguardian.com/environment/2021/jan/22/quarter-of-known-bee-species-have-not-been-recorded-since-1990>

^{xii} **ibid**