

Dear Honourable Members of the Environment Committee of the European Parliament,

I write to ask you to **vote FOR the 3 objections tabled by Julie Girling** pursuant to Rule 106(2) and (3) of the Rules of Procedure on the draft Commission Implementing Regulation amending Implementing Regulation (EU) 540/2011 as regards the conditions of approval of the active substances clothianidin, thiamethoxam and imidacloprid.

Please find attached the text of three Motions for Resolution addressing each individual active substance. The discussion for these objections will take place on 21st of June, while the vote will take place on the 22nd of June in the ENVI Committee.

As representatives of the European Crop Protection Association, we support these Motions for Resolution and ask you to vote in favour because:

- 1. The current draft proposal extends this ban to all crops grown outdoors including crops not attractive to bees and with the exception of permanent greenhouse crops, which means that exposure is very unlikely.*
- 2. Whilst the initial restrictions on the three neonicotinoids were based on a perceived notion that neonicotinoids have a negative effect on Bee Health, the restrictions have yet to yield any positive change to Bee Health in Europe.*
- 3. The basis for the Draft Commission proposals are attributed to a theoretical risk evaluation which is not representative of realistic field conditions and is based on an un-validated Guidance Document which has been repeatedly rejected by Member State experts in the Standing Committee, due to its impracticability.*
- 4. EFSA is currently reviewing newly provided data for the original ban of the 3 neonicotinoids in 2013 and is set to publish its findings by November 30, 2017, thus the new EC draft proposal precludes EFSA conclusions which could reverse the original ban.*
- 5. The draft proposal will have significant negative consequences for farmers producing crops such as sugar beet, cereals as well as fruits and vegetables, and for the environment. According to a recent study, due to the European restrictions on neonicotinoids, an increase of 1.3 billion m³ of water will be used globally, while within the EU it will require 1.4 million m³ more water.*
- 6. Despite extensive research, there has yet to be a study conducted which demonstrates the 3 abovementioned neonicotinoids are harmful to bee colonies under realistic field conditions.*
- 7. The European Commission has failed to conduct an impact assessment looking at the socio-economic effects of the draft proposal. The only relevant impact assessment conducted by the Commission's own JRC concerning the original restrictions on flowering crops in 2013 showed that:*
 - farmers faced significant challenges in pest management and subsequently were forced to apply more insecticide treatments*
 - they did not observe an increase in beneficial insects in the field since the restrictions were put in place*
 - the lack of effective and diverse insecticidal modes of action accelerate pest resistance, thereby rendering the limited tools ineffective.*

Furthermore, please note that In May 2017, 10 associations in the agri-food chain penned a letter to Commissioners Hogan and Andriukaitis requesting the retraction of the proposal due to the devastating consequences that such a ban would have. Additionally, in the same month, 15 MEPs from 7 countries in 4 political groups wrote to President Juncker also asking for the proposal to be retracted.

If you require further background information from Bayer or Syngenta, on these 3 substances, please do not hesitate to contact Felix Uedelhoven (felix.uedelhoven@bayer.com) or Alain-Dominique Quintart (Alain-Dominique.Quintart@syngenta.com)

Yours sincerely,

Graeme Taylor

Director of Public Affairs

