



House of Commons
Environmental Audit
Committee

**National Pollinator
Strategy: Government
Response to the
Committee's Second
Report of Session
2014–15**

**Seventh Special Report of Session
2014–15**

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Environmental Audit Committee

The Environmental Audit Committee is appointed by the House of Commons to consider to what extent the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development; to audit their performance against such targets as may be set for them by Her Majesty's Ministers; and to report thereon to the House.

All publications of the Committee (including press notices) and further details can be found on the Committee's web pages at www.parliament.uk/eacom

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Seventh Special Report

The Environmental Audit Committee reported to the House on 28 July 2014 on the *National Pollinator Strategy* (HC 213). The Government response to the Committee's Report was received on 29 September 2014, and is appended below.

Appendix—Government response

Introduction

Safeguarding our wild pollinator populations, as well as managed pollinators, is a priority for Government and the National Pollinator Strategy sets out our commitment to play a leading role. We welcome the Environmental Audit Committee's report on the Strategy, their close engagement with the issues, and their recommendations for action. We agree with the Committee that establishing a baseline through our monitoring project is vital to developing effective actions for wild pollinators.

Response to Conclusions of the Environmental Audit Committee

1. The 2013 decision to ban three neonicotinoid pesticides, introduced in Europe against the wishes of the Government, was the right approach given the requirements of the precautionary principle. The Government continues to interpret that principle as encompassing economic as well as environmental considerations. We do not agree. However, if the Government insists on doing so, it should follow its own argument by being able to clearly demonstrate not just the impact of neonicotinoids on pollinators, but also the benefits or otherwise of using them on crop yields and the possible cost of reduced pollination services. (Paragraph 11)

The Government has implemented the 2013 EU restrictions in full. For the 2015 review we will consider the available scientific evidence.

In line with Principle 15 of the 1992 Rio Declaration on Environment and Development, the Government takes the view that economic considerations are relevant to the application of the precautionary principle. Serious environmental threats—including unacceptable risks from pesticides—must be tackled. The way in which this is done should take account of costs.

2. We welcome Defra's commitment to establish a national pollinator monitoring framework. This is an area where a lack of universally accepted research has allowed a degree of uninformed assertion to mix unhelpfully with robust science. A clear and less disputed 'baseline' understanding of the plight of pollinators, what is putting pressure on their numbers and what is not, is a necessary first step in identifying practical measures to support pollinators. (Paragraph 21)

The Government welcomes the support of the Environmental Audit Committee for our national pollinator monitoring framework. We agree that a clear baseline establishing trends in wild pollinator populations and the threats they face is essential if we are to make effective policy decisions. Work is already underway through the Government co-funded Insect Pollinators Initiative (2010–2015), to understand the status of wild pollinators better.

We have now commissioned a two-year research project to develop and test a monitoring procedure to provide consistent measurements of the distribution and abundance of wild pollinators. When carried out over many years we expect this to be of sufficient quality to allow appropriate statistical measurement of the relative success of different interventions intended to build pollinator populations and ensure that pollination services are maintained. The early results from the project will inform our planned review of the Strategy's aims and policy actions by 2019 as far as possible, although the timescale needed to deliver a robust estimate of the direction of change in pollinator populations is likely to be a decade or longer. We will work with interested parties on the review from 2016 onwards.

3. Defra's reliance on industry to fund critically important research exposes it to excessive reliance on the commercial (rather than scientific) research priorities of these bodies and is symptomatic of a loss of Defra's capacity to deliver its environmental protection obligations. Defra's role as a "referee", as the Department put it, for evidence delivered from that research will not be of much use if the studies are designed according to priorities different than those the Department itself should be concerned with. (Paragraph 22)

Defra needs to understand the nature of environmental risks posed by pesticides and to develop ways to assess these risks. We have a continuing programme of work for this purpose. Studies on the impacts of particular pesticides are needed to inform the EU regulatory process. In the case of neonicotinoids, three of these are currently restricted by the EU with the aim of protecting pollinators. As part of these restrictions, a number of data requirements have been set for companies and the European Commission has undertaken to review the evidence, beginning next year.

EU rules require that it is for companies to provide the scientific work to support the authorisation of their products. They are not free to design whatever studies they wish. The studies they submit must be those required by the EU regime to meet high scientific standards of quality and integrity and to address the needs of the regulators. To meet these requirements, it is common for studies to be carried out by contract laboratories, rather than in-house by the pesticide companies. All studies submitted in support of the approval of active substances are carefully scrutinised by the European Food Safety Authority and by Member State experts.

4. Where the research is being funded by pesticide manufacturers, it is important that the design of the studies and how they are undertaken and reported is independent of its paymasters, and is transparent. This is particularly important because Defra has already declared its antipathy to the ban on neonicotinoid pesticides. Its ability to act as a "referee" requires not only that it is unbiased, but also that it is seen as such by the

public. We take some assurance from the fact that the Centre for Ecology and Hydrology will oversee the integrity of the work. (Paragraph 23)

The Government takes a view on the regulation of pesticides based on the scientific evidence. The Government accepts the benefits of transparency and independence in helping to ensure that scientific studies are well designed and in assisting public debate and confidence in decisions. We have discussed these issues with companies in the case of neonicotinoids and are pleased that the Centre for Ecology and Hydrology are carrying out the work. As explained in our response to conclusion 3 above, the requirements which companies must meet are set by the EU.

5. The CAP reforms were an opportunity for farming to lead the way in supporting pollinators. The way that Defra is structuring the environmental schemes within the CAP, however, risks that opportunity being lost. (Paragraph 31)

The Government takes the view that environmental benefits are best achieved through the rural development pillar (Pillar 2) of the CAP, which allows a targeted approach. The current Environmental Stewardship scheme already encourages farmland management which benefits pollinators. We will be announcing the details of the new scheme later this year.

6. While Integrated Pest Management does not mean an end to the use of pesticides, it offers a way to reduce their application and the risks they present to pollinators. (Paragraph 35)

The Government agrees that Integrated Pest Management can help, in the words of Directive 2009/128 on the sustainable use of pesticides, ‘ensure better targeted use of all available pest control measures’. This is an area we will continue to develop in line with the commitment in the UK National Action Plan for pesticides.

7. We welcome the Strategy’s emphasis on public engagement in protecting pollinators. It will tap an invaluable and committed resource, and help lock in continuing pressure on Government to maintain pro-pollinator initiatives. We welcome Defra’s declaration that the final National Pollinator Strategy will advise the public to consider alternative, non-pesticide, pest control methods. (Paragraph 37)

The Government welcomes this endorsement of its work to engage the public. Taking actions now to provide the right resources for pollinators is an early priority for the Strategy. On 18 July we launched our pollinator ‘Call to Action’ advice, which we have developed with our stakeholders. This included a simple message on pollinators’ essential needs—Bees’ needs: food and a home—and five simple actions for everyone to take to meet these needs. We are developing more tailored, detailed advice over the next 12–18 months in light of emerging results from the Insect Pollinators Initiative and other research work. We will continue to work with our stakeholders to develop this advice and to ensure it reaches the widest possible audience via traditional and social media channels.

Response to the Recommendations of the Environmental Audit Committee

8. While we were seeking clarification on its application to use an EU-based neonicotinoid seed-treatment, Syngenta withdrew it. The Government should make clear, either in its response to this report or in the final National Pollinator Strategy, that had it been obliged to rule on the application it would not have allowed it, or indeed any other of a similar kind in future. (Paragraph 18)

If the Government receives an application for emergency authorisation, we have to consider this according to the EU rules. The European Commission has confirmed that this remains the case for applications relating to the restricted uses of neonicotinoids. We take these applications extremely seriously and all relevant factors need to be considered very carefully. We had not concluded our assessment of the Syngenta application at the time of the withdrawal and therefore cannot comment on the eventual outcome had they not withdrawn.

9. Defra must ensure that independent controls remain in place throughout any commercially-funded research, and that when completed the results are peer reviewed and published in full and without delay. (Paragraph 23)

This research is carried out by commercial companies for consideration by the EU and in accordance with the rules for regulatory studies. The Government has emphasised to those companies considering large-scale field studies of effects on bees the benefits of independent design, transparency and publication in the peer-reviewed literature.

10. The Government must review the aspects of CAP environmental schemes which are open to national decision-making to ensure that pollinator protection is a priority driver rather than an optional rationale. It should also ensure that the European Commission's review of the implementation and efficacy of Ecological Focus Areas after their first year of operation applies a similar test. (Paragraph 31)

We will be announcing the details of the new scheme in due course.

11. Defra should present in the finalised Pollinator Strategy a clear view of what Integrated Pest Management includes and excludes, and ensure its interpretation of IPM reflects best practice elsewhere, including the UN guidance. The Strategy should also set out how potential targets for IPM, including for reduced pesticide use, could build on a research-led, evolving understanding of the factors affecting pollinators. (Paragraph 35)

The Government accepts the need for a clear definition of IPM and draws on that set out in the EU directive on the sustainable use of pesticides. We also agree that approaches in this area should develop in the light of research on effective and sustainable techniques, and should take account of knowledge and best practice from all sources.

Defra carries out a substantial amount of research to support sustainable farming and the development of integrated approaches. This includes work on alternatives to conventional chemical pesticides, on resistance management, on identification of genetic resistance, on tolerance to pests and diseases, and on the development of integrated control systems. Our

overall approach to IPM is set out in the National Action Plan for the sustainable use of pesticides. In line with the commitment given in that Plan and the specific action points in the National Pollinator Strategy, we will be developing our activities in this area. In doing so we will pay attention to the roles that different parties can take in developing and promoting IPM.

As explained in the Government's response to the Committee's inquiry into Pesticides and Pollinators in 2013, across-the-board targets to reduce the use of pesticides are not helpful. Reducing the risk of harm does not equate to reducing the quantity used (the choice of pesticide, the timing and location of use, weather patterns and a number of other factors all complicate the picture).

12. The finalised Strategy and the 'delivery package' to take it forward should set out the Government's intended approach in the areas we have examined in this report: ensuring agriculture plays a full part in protecting pollinators; the role of Integrated Pest Management; and how public engagement will be sustained. It should explain and justify the logic of the predominantly voluntary approach of the measures in the draft Strategy and identify the tests for judging if a mandatory or incentivised approach would be required. The final Strategy should provide a coherent narrative of how all relevant Government policies will contribute to pollinator protection—not just other environmental policies within Defra's remit but those of other departments such as the well-being agenda and development planning—and set out a process for the Strategy to be continually updated as further research is undertaken and policy developed. (Paragraph 38)

We will take these points into consideration.

13. Defra should use the final Strategy to draw a line under the neonicotinoid ban by making it clear that the UK accepts the European risk assessments underpinning the ban, that it supports the ban and will not seek to end it when a European review is possible in 2015, or otherwise to circumvent it. Defra should make it clear that applications to continue using neonicotinoids, like Syngenta's, would constitute an attempt to by-pass the precautionary principle rationale behind the ban and as such will not be contemplated. (Paragraph 39)

The Government has fully implemented the EU restrictions. When it comes to the 2015 review, we will take a view of all the scientific evidence.