



European Association representing the trade in cereals, rice, feedstuffs,
oilseeds, olive oil, oils and fats and agrosupply
Comité du commerce des céréales, aliments du bétail,
oléagineux, huile d'olive, huiles et graisses et agrofouritures

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European Commission proposal to suspend for two years the use of neonicotinoid pesticides in crops attractive to bees

COCERAL views

The publication of EFSA risk assessment on the effects of three neonicotinoid pesticides on bees¹ caught the media's attention and led to prompt reactions from the EU authorities². The report concluded that there was a high acute risk for bees linked to their exposure to dust in several crops. Additionally, EFSA identified several data gaps and areas in which the risk could not be determined.

COCERAL recognises and acknowledges the important role of bees for the ecosystem and for the entire food chain and highlights that all COCERAL members are working to conserve and protect pollinators.

The bees' health is a multi-factorial issue, affected mainly by diseases and parasites, but impacted also by weather conditions, habitat availability and other problems, as acknowledged by the EU authorities and bee keepers³. Pesticides are only one of the problems. Additionally, a level of uncertainty on the assessment carried out by EFSA on the possible effects of neonicotinoids on bees was acknowledged, more field data being required before reaching a comprehensive conclusion.

The availability and accessibility of efficient plant protection products are very important for the COCERAL members as they ensure high quality and quantity of crops, thus avoiding shortages of supply. Their withdrawal would impact severely the ability of many farms to remain sustainable and have knock-on effects for EU agricultural production. Banning the neonicotinoid treatments would deprive operators from an important and effective tool for pest control, leaving in some cases no viable alternative treatments. Additionally, some alternative treatments are likely to have more deleterious effects on the environment, but as there is no data available on the possible negative effects of those alternatives, this brings additional uncertainty to the discussion.

Restricting the use of neonicotinoids would lead to problems at field level for farmers. Pest resistance management would become more difficult due to limited options to fight against them, thus reducing crops yields.

COCERAL would also like to point out that in case a restricted use of neonicotinoids is put in place, a transition period should be foreseen before its entry into force. This would allow operators and seed merchants to supply dressed stocks and farmers to use

¹ EFSA Journal 2013;11(1):3067 [68 pp.] / EFSA Journal 2013;11(1):3066 [58 pp.] / EFSA Journal 2013;11(1):3068 [55 pp.]

² The EC has submitted a proposal to ban the use of the three neonicotinoids under discussion on certain crops

³ EC presentation of 26th of February on the "Risk management for bee health" available at the following link
<http://www.ebcd.org/pdf/presentation/304-Laddomada.pdf>

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existing stocks in the supply chain rather than pay for disposal of viable seed stocks. A transitional period might also prove helpful in finding potential alternative solutions.

In summary, losing neonicotinoid treatments, without scientific justification would have a high impact on the availability of several crops within EU in the current context of increasing demand and would have economic implications on the entire supply chain.

COCERAL therefore recommends the European Commission and Members States to carefully reconsider the proposal to ban the use of neonicotinoids on certain crops considering that additional information is required by EFSA to complete its risk assessment.

COCERAL is the European association of cereals, rice, feedstuffs oilseeds, olive oil, oils and fats and agrosupply trade. It represents the interest of the European collectors, traders, importers, exporters and port silo storekeepers of the above mentioned agricultural products. COCERAL's full members are **31 national associations** in **19 countries** [Austria, Belgium, Bulgaria, Cyprus, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Luxemburg, Poland, Romania, Slovenia, Spain, Sweden, the Netherlands and the UK] and **1 European association** [Unistock] With about **2700 companies** as part of COCERAL national members, the sector trades agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses. COCERAL has an associated member in Switzerland.