



## **European Sugar Manufacturers (CEFS) oppose the Commission's proposal of an Implementing Regulation to extend the ban on the 3 neonicotinoids to non-flowering crops.**

### **I. CEFS POSITION ON THE PROPOSED EXTENSION OF THE BAN TO SUGAR BEET**

The EU beet sugar sector urges the **Members of the ENVI Committee of the EU Parliament** to take the following points into consideration to oppose the proposal of the Commission to extend the current partial ban on the use of neonicotinoids to non-flowering crops like **sugar beet**. **CEFS opposes** the Commission's proposals to **ban the use of neonicotinoids in seed treatments for non-flowering crops in particular sugar beet**.

This proposal is **unjustified**, based on **incomplete scientific evidence**, and **precedes the EFSA risk assessment expected in autumn 2017**.

### **II. JUSTIFICATION FOR OPPOSING A BAN ON THE USE OF NEONICOTINOIDS IN NON-FLOWERING CROPS INCLUDING SUGAR BEET**

**Neonicotinoids are currently the best products to protect sugar beet at its early stage of growth from the most damaging insects, especially aphids that carry yellow virus, while having the least impact on the environment.**

## 1. The risk to pollinators of the use of neonicotinoids in sugar beet is very low

- **EFSA** reports that for **sugar beet**, there are **no significant risks arising from the crop itself**, because it is a non-flowering crop which is not attractive to pollinators. Similarly, the risk from **guttation** (sap droplets) and flowering **weeds** is also concluded as being **very low**<sup>1</sup>.
- In the case of **soil residues**, it has been demonstrated that Thiamethoxam (TMX) will degrade to concentrations that are below 10% of the maximum within a year of application, and will not accumulate in soil after repeated applications<sup>2</sup>. According to the crop protection industry, the use of Clothianidin (CTD) or Imidacloprid (IMD) treated sugar beet does not present a risk to bees from the exposure to residues in succeeding crops.<sup>3</sup>
- In the case of **dust**, the seed planting ('drilling') technique and insecticide application method significantly affects the amount of dust drift. The sowing machinery used for sugar beet is mechanical in most European countries, which minimises the risk of dust emissions and ground deposition during drilling<sup>4</sup>. Dust risk is also lower for beet because the insecticide is micro-applied in a protective coating in the pellet which encloses the seed, which greatly reduces the amount of insecticide used and is more secure than the application on most other crops<sup>5</sup>.

## 2. Alternative insecticides would be much more damaging for the environment and bees

- In the absence of neonicotinoids, there are **no resistant sugar beet varieties** available, or in prospect, which could replace their crop protection function. Farmers would therefore be wholly dependent on alternative insecticides.
- **Alternative insecticides**, like pyrethroids and carbamates, would have to be sprayed onto the crop several times throughout the growing season. This would substantially increase the amount of insecticide used, as well as increasing the risk to pollinators and non-target organisms than neonicotinoids in seed treatments do.
- Repeated, sub-optimal pyrethroid and/or carbamate applications would also lead to increased resistance building up in the target pests<sup>6</sup> (mainly aphids<sup>7</sup> in sugar beet, which spread a damaging disease called virus yellows). This would further reduce the effectiveness of the treatments, leading to more insecticide having to be used, which would damage the environment and the surrounding biodiversity.

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<sup>1</sup> <https://www.efsa.europa.eu/en/efsajournal/pub/4607> ; <https://www.efsa.europa.eu/en/efsajournal/pub/4606>

<sup>2</sup> Hilton et al, 2015: The degradation rate of thiamethoxam in European field studies: <http://onlinelibrary.wiley.com/doi/10.1002/ps.4024/full>

<sup>3</sup> Garside, G.M, 2017: Bayer AG: Statement: Residues of imidacloprid and clothianidin in pollen and nectar of succeeding crops relevance to Sugar beet. Document no. : EnSa-17-0237

<sup>4</sup> Hauer et al, 2016: Neonicotinoids in sugar beet cultivation in Central and Northern Europe: Efficacy and environmental impact of neonicotinoid seed treatments and alternative measures.

<sup>5</sup> Nuyttens et al, 2012: Pesticide-laden dust emission and drift from treated seeds during seed drilling: a review:

[http://pure.ilvo.vlaanderen.be/portal/files/1160548/2013\\_Nuyttens\\_Lit\\_review\\_dust\\_drift\\_PMS.pdf](http://pure.ilvo.vlaanderen.be/portal/files/1160548/2013_Nuyttens_Lit_review_dust_drift_PMS.pdf)

<sup>6</sup> Hauer et al, 2016: Neonicotinoids in sugar beet cultivation in Central and Northern Europe: Efficacy and environmental impact of neonicotinoid seed treatments and alternative measures.

<sup>7</sup> ITB, 2015: Technical arguments regarding the use of neonicotinoid-based seed treatments in the cultivation of sugar beet.

### **3. A ban would reduce sugar beet yields and productivity**

- Neonicotinoids are extremely effective in controlling the aphid (greenfly) vector which spreads a damaging disease of sugar beet, called 'virus yellows'<sup>8</sup>. This is especially important as there is no correlation in the field between the number of aphids present and the severity of the beet yellow virus<sup>7</sup>. Neonicotinoids protect the sugar beet seedling before aphids appear making them indispensable.
- Without neonicotinoids, this disease would greatly increase, causing substantial sugar beet yield loss<sup>6</sup> which would damage the efficiency of the sector and increase costs.
- The disease is also extremely variable from year to year<sup>6, 7</sup>. A ban would therefore also jeopardize food supplies and security in an unpredictable way which the industry would not be able to adjust to or manage effectively.

### **4. A ban would have damaging consequences for the long term economic and sustainable prospects of the sector**

- The EU beet sugar industry is preparing for one of the biggest changes in its history: full deregulation and the end of production quotas from 1 October 2017. The loss of competitiveness caused by a ban would therefore occur at exactly the time the sector is most vulnerable as it prepares for this challenge.
- To prepare for these changes, the EU beet sugar industry has worked hard to increase its competitiveness while supporting some of the highest environmental and operating standards in the world. Introduction of a ban of neonicotinoids in sugar beet would damage these goals by making beet a less attractive 'break' crop in the arable rotation, thus jeopardizing a sustainable agri-food sector<sup>9</sup> that contributes positively to the EU agri-food and the development of the EU bioeconomy<sup>10</sup>.
- Such an extensive ban would also create an uneven level-playing field in EU trade with third countries as pesticides such as neonicotinoids will continue to be used without restrictions outside Europe.

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<sup>8</sup> <http://agriculture.gouv.fr/rapport-filiere-betterave-sucre-francaise-perspective-fin-des-quotas>

<sup>9</sup> <http://www.sustainablesugar.eu/about/>

<sup>10</sup> <http://bioeconomyalliance.eu/about-euba-bioeconomyalliance>

## BACKGROUND INFORMATION

### ***ABOUT THE BAN AND THE TIMELINE OF THE RESTRICTIONS ON NEONICOTINOIDS***

In **2013**, the European Commission took the decision to **restrict the use of the three neonicotinoids Clothianidin (CTD), Imidacloprid (IMD) and Thiamethoxam (TMX) for crops attractive to bees (Regulation 485/2013)**.

In **July 2015**, EFSA published its reports<sup>11</sup> on foliar uses for all three neonicotinoids.

**Regulation 485/2013** also states that, for the remaining uses, additional confirmatory data are to be required and evaluated. As a result, EFSA's confirmatory data reports for IMD and CTD which evaluate seed treatment uses were published in **November 2016**. EFSA did not provide a report for TMX.

Following informal discussions on potential further restrictions in the January meeting of the Standing Committee on Plants, Food and Feed (SCOPAFF), the Commission prepared draft proposals for Implementing Regulations to amend the conditions of use of all three neonicotinoids. These proposals were shared with the Member States the day before the SCOPAFF meeting for 22-23 March 2017. According to Article 2 of the draft Implementing Regulations for CTD and IMD:

*...seeds treated with plant protection products containing CTD/IMD may not be placed on the market or used, with the exception of seeds to be used in permanent greenhouses...*

In particular for CTD, sugar beet is mentioned in exposure via dust where a *"high risk cannot be excluded for most field uses"*. The same conditions apply to the Commission proposal for TMX.

The Commission appears to be pushing for an **early vote of this draft regulation at the SCOPAFF meeting taking place on 17-18 May 2017**.

### ***ABOUT CEFS***

*CEFS, founded in 1953, represents **61** sugar companies across **19** Member States (Austria, Belgium, Croatia, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Lithuania, Netherlands, Poland, Slovakia, Spain, Sweden, Romania and United Kingdom) as well as in Switzerland. Sugar beet is processed in the EU by **109 factories driving economic activity, especially in rural areas, and supporting around 140,000 European farm businesses and 180,000 direct and indirect jobs.***

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<sup>11</sup> <https://www.efsa.europa.eu/en/press/news/150826>