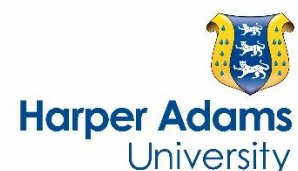


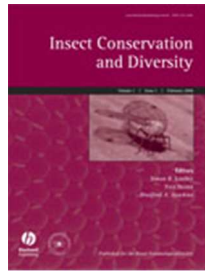
Neonicotinoids, bees and opportunity costs for conservation

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Neonicotinoids, bees and opportunity costs for conservation

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Abstract

1. Restrictions on the use of neonicotinoid insecticides in the European Union are widely debated in relation to bee decline, but their potential consequences at the interface between sustainable crop production and conservation are less frequently discussed.
2. This paper raises issues to be considered if we are to achieve a balanced consensus in this contentious area.
3. The common legal framework governing testing and environmental impact for all chemical crop protection products is highlighted, leading to concerns that the current focus on impact of neonicotinoids is diverting attention from other drivers of bee decline to the detriment of a balanced conservation strategy.
4. The evidence for the causal relationship between neonicotinoid use and bee decline is considered and information gaps requiring further work identified.
5. How research into the parallel use of pesticides and beneficial invertebrates in integrated pest management (IPM) can inform the pollinator debate is highlighted. The importance of the neonicotinoids in major IPM systems is illustrated, leading to discussion of potential consequences for conservation of biodiversity and sustainable crop protection if they were lost and we revert to reliance on other pest management tools.
6. Increasing agricultural production and conservation are sometimes viewed as being contradictory and the paper concludes by calling for a broadening of the debate to consider the complimentary objectives of bee conservation and sustainable crop production, so that advances in both fields can hasten consensus on the way forward, rather than perpetuating the current rather polarised debate.

32 Introduction

33 In a note to the 1884 edition of *Old Mortality*, Robert Louis Stevenson observes that “sooner or later
34 everybody sits down to a banquet of consequences”, a relevant warning when we consider the
35 wider impacts of the current debate on the effect of neonicotinoid insecticides on pollinators.

36
37 The decline of bee species during the last 60 years has been attributed to various stressors including
38 habitat loss, loss of floral diversity in key landscapes, predators, parasites, disease and pesticides
39 (Goulson *et al.*, 2015; Vanbergen *et al.*, 2013; Ollerton *et al.*, 2014). A key driver of public and
40 environmental concern relating to bee decline has centred around the loss of the ecosystem services
41 they provide, principally crop pollination, and conservation issues. It is, however, often not
42 recognised that although wild bees contribute significantly to production of insect pollinated crops,
43 this service delivery is limited to a small subset of known bee species (Kleijn *et al.*, 2015). As these do
44 not include many threatened species, the exposure to insecticides of those at-risk species is severely
45 limited. The importance of diversity, however, in providing resilience through species redundancy or
46 complementarity should be recognised (Brittain *et al.*, 2013; Hoehn *et al.*, 2008; Rader *et al.*, 2012,
47 2013). Although bee decline has been more fully documented in Europe and North America, it is
48 likely that common global drivers might be expected to produce similar outcomes in other
49 continents (Carvalho *et al.*, 2013; Koh *et al.*, 2015). The decline in Europe commenced long before
50 the introduction of neonicotinoids (Bonmarco *et al.*, 2011; Carvalho *et al.*, 2013) and they have
51 been subject to and met the same registration requirements as all other pesticides currently used in
52 EU crop production. Despite these observations, neonicotinoid insecticides have become a focus of
53 attention as a potential driver of the decline (Blacquiere, 2012; Godfray *et al.*, 2014; Goulson, 2013).
54 This led in 2013 to the European Union announcing a restriction on the use as seed treatments of
55 three active ingredients (Imidacloprid, Thiamethoxam and Clothianidin) in bee attractive crops (EC,
56 2013), which is now commonly referred to as a moratorium.

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56 58 **Registration testing and conservation**
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9 59 To obtain registration for use in the EU, candidate active ingredients/products are subject to
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11 60 harmonised registration requirements (EC, 2009a) that can only be met after environmental hazard
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13 61 and safety has been established by extensive laboratory and field research. This work has to be
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15 62 generated under Good Laboratory Practice (GLP) or other stringent auditable quality standards, and
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17 63 conform to detailed guidelines originally established by independent experts (EPPO, 2010; OECD,
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19 64 2013). The data are assessed by independent specialist scientists at national registration authorities,
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21 65 and use (subject to legally enforceable label restrictions) is allowed only after multiple criteria have
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23 66 been satisfied, including acceptably low risk of environmental damage. Unfortunately, such data are
24
25 67 rarely published due to commercial considerations, thus this large body of evidence is not available
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27 68 or discussed by academics or environmental interest groups. This may have contributed to an
28
29 69 imbalanced debate, with the strong focus on perceived impacts of a single class of insecticides
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31 70 drawing attention away from other key (perhaps more dominant) drivers of bee decline such as
32
33 71 landscape change reducing floral resources and nest sites for bees, pests and disease (Vanbergen *et*
34
35 72 *al.*, 2013). Critically this has also detracted from research into, and development of, agricultural
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37 73 techniques that mitigate pesticide effects (Matthews *et al.*, 2014). If such mitigation factors have
38
39 74 significant effects on resultant risk then conservation efforts will not be well served by a narrow
40
41 75 focus on neonicotinoids that draws attention away from achievable goals of improving landscapes to
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43 76 enhance botanical biodiversity.
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51 78 Given the common legal framework enforces equally high environmental standards for all chemical
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53 79 crop protection products, why are the neonicotinoids so prominent in the debate when many
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55 80 authors suggest that other stressors (particularly landscape change/habitat) are more dominant
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3 81 drivers of pollinator decline (Vanbergen *et al*, 2013)? Many other questions arise but key issues

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5 82 include:

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8 83 Is the evidence regarding hazards and risks posed by neonicotinoids conclusive?

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11 84 Is the moratorium, which in the UK is leading to use of older (arguably more hazardous) chemistries

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13 85 (Nicholls, 2015), itself inadvertently raising serious concerns for conservation of biodiversity and

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15 86 sustainable crop production?

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24 89 Such issues are of global, not just European importance as many countries are considering their

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26 90 future policy on neonicotinoid use.

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32 92 **Evidence and information gaps**

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35 93 If there is clear evidence that neonicotinoid insecticides on their own constitute a major factor in

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37 94 bee declines, then irrespective of the relative importance of other drivers the EU moratorium would

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39 95 be justified on conservation grounds.

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44 97 The use of the products as seed treatments leading to pollinator exposure through translocation into

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46 98 nectar and pollen has received most attention in the current debate. Very low levels of the three

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48 99 active ingredients subject to the moratorium have been reported in pollen and nectar in treated

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51 100 commercial fields (EFSA 2013a, b, c), and some of these records undoubtedly result from improved

52
53 101 analytical technology that has reduced detection limits (Walters, 2013). Exposure to low levels of

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55 102 these active ingredients does not necessarily result in significant risk as the dose delivered is often

56
57 103 too low to stimulate either acute or chronic lethal or sub-lethal responses (Carreck & Ratnieks,

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3 104 2014). This partly explains why predicted risks surrounding their use have not been confirmed in
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5 105 most field investigations (Cutler *et al.*, 2014; Godfray *et al.*, 2015; Rundlof *et al.*, 2015).
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7 106
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9 107 Another aspect of use of treated seed has, however, led to some well reported large scale incidents
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11 108 in Germany, Italy and Slovenia in which acute honeybee losses resulted from dust generated during
12
13 109 drilling of maize (Forster, 2012). If repeated across wider proportions of the agricultural landscape,
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15 110 such incidents would represent a serious challenge to conservation of biodiversity. Following
16
17 111 investigation of the causes (which included poorly/improperly treated seed), legislators responded
18
19 112 immediately to address the risk with extra registration requirements limiting dust generation and
20
21 113 requiring use of deflectors to reduce contamination of surrounding vegetation with airborne dust
22
23 114 (EU, 2010). These mitigation procedures were intended to prevent recurrence of similar incidents
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25 115 and contribute to the safeguarding of bee populations. The results of some widely discussed
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27 116 laboratory and field studies have, however, added to concerns fuelled by these incidents and some
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29 117 of these have been enhanced by sensationalist reporting in the media. Responses have also been
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31 118 demonstrated using a wide range of sub-lethal endpoints some of which have not been related to
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33 119 consequences at the colony or free-flying individual levels in either the laboratory or field but still
34
35 120 were used in arguments favouring the moratorium (IPBES, 2016). Thus discussion in the popular
36
37 121 press often conflates two issues, dust from drilling and sub-lethal effects that may result from oral
38
39 122 exposure, and assumes colony level effects where these have not been definitively demonstrated, a
40
41 123 point that is rarely recognised. None-the-less, if some of the resultant claims of neonicotinoid
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43 124 impacts on pollinators are correct then perhaps we should be worried, so how strong is the
44
45 125 published evidence supporting the EU moratorium?
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49 127 Worryingly, significant gaps in datasets used to defend the decision to introduce the moratorium
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51 128 have now been recognised. The research conducted has a narrow focus; most studies have
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53 129 investigated Imidacloprid (>70% laboratory studies and >85% field studies), but this active ingredient
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3 130 had to large extent been superseded in Europe as a seed treatment for relevant crops prior to the
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5 131 introduction of the moratorium (Walters, 2013). Reliable extrapolation of the effects reported for
6
7 132 imidacloprid to other neonicotinoids is prevented by variable characteristics of the active ingredients
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9 133 (Blacquiere *et al.*, 2012; Godfray *et al.*, 2014). For example, unlike thiamethoxam and clothianidin,
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11 134 imidacloprid displays wide variation in acute oral toxicity of (4-400 ng/bee). It also has several toxic
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13 135 plant metabolites in the pollen and nectar, differing again from thiamethoxam and clothianidin. In
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15 136 addition microsomal mono-oxygenase P450 enzymes do not appear as a major route of metabolism
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17 137 in bees, whereas P450 enzymes feature strongly in the metabolism of thiamethoxam and
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19 138 clothianidin, potentially reducing impact on bees (Thompson *et al.*, 2014a). These differences, and
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21 139 others, underline the importance of considering such active ingredients individually to maximise our
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23 140 understanding of their impact on conservation issues
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29 142 Additional gaps in the evidence-base presented in support of the moratorium are also evident; most
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31 143 studies investigate *Apis* species with few on other pollinators (including wild bees) despite the
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33 144 greater importance of wild pollinators as providers of ecosystem services (Blacquiere *et al.*, 2012;
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35 145 Garibaldi *et al.*, 2013; Godfray *et al.*, 2014). This is important as there is growing evidence for
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37 146 variable responses to neonicotinoid exposure between bee taxa (Rundlof *et al.*, 2015; Piironen &
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39 147 Goulson, 2016). For example, differential sensitivity of honeybees and bumblebees to a dietary
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41 148 insecticide (imidacloprid) have been reported, whereby following exposure bumblebees
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43 149 progressively developed a dose-dependent reduction in feeding rate, whereas honeybees did not
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45 150 (Cresswell, 2012). Further, the EFSA collations of data on neonicotinoid contamination of nectar and
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47 151 pollen under commercial field conditions demonstrate that bees showing effects in many laboratory
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49 152 experiments have been exposed to unrealistically high levels of pesticides when three key dosage
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51 153 characteristics (concentration, duration and choice) are taken into account (Carreck & Ratnieks,
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53 154 2014). Complications in replicating field exposure are also magnified by the range of application
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55 155 technology used by farmers, which target insecticides at pests whilst reducing the exposure of non-

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3 156 target organisms (Matthews *et al.*, 2014). This is a key but rarely discussed consideration if we are to
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5 157 simultaneously meet our essential conservation and sustainable food production targets.
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9 159 Legislation governing pesticide use has also been strengthened to reduce environmental risk,
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11 160 coupled with operator training (a legal requirement in the UK aimed at maintaining both
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13 161 environmental and operator safety), that compliment these technological advances (EC 2009b;
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15 162 Matthews *et al.*, 2014). Such rules governing pesticide use have not, however, been considered
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17 163 when interpreting the findings of many studies of pesticide impacts on pollinators. This exacerbates
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19 164 the problems associated with both extrapolation of experimental results to commercial field
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21 165 conditions, and drawing clear conclusions on conservation risk and mitigation.
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25 167 A sub-set of these problems, particularly usage characteristics and dose rates, have beset field and
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27 168 semi-field studies, possibly explaining very different responses reported following exposure to
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29 169 neonicotinoids in commercial crops, with some authors recording no impact at either individual or
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31 170 colony levels whilst others note detrimental effects (Cutler & Scott-Dupree, 2014; Cutler *et al.*, 2014;
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33 171 Gill, R. J., *et al.*, 2012; Rundlöf *et al.*, 2015). For example, high dose rates of two pesticides (a
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35 172 neonicotinoid and a pyrethroid) were used in a study investigating the effect of these active
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37 173 ingredients individually and in combination (Gill *et al.*, 2012). In this case the imidacloprid dose rate
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39 174 was nearly an order of magnitude greater than the highest residue reported in nectar in any
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41 175 European commercial crop (data on commercial field residues from EFSA, 2012). The correct full
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43 176 label rate dilution for the pyrethroid spray was used but the volume applied per unit area resulted in
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45 177 a greater than permitted (in the EU) dose rate, resulting in over-exposure. A second example is
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47 178 provided by a study of effects of clothianidin applied to spring oilseed rape (Rundlöf *et al.*, 2015). In
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49 179 this case the residues in pollen and nectar were again an order of magnitude higher than reported in
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51 180 any commercial fields in the EU, or in any previous field studies of this active ingredient (e.g. Cutler
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53 181 & Scott-Dupree, 2014). Although such investigations provide evidence of responses at very high
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3 182 exposure rates it is difficult to determine their significance within the more typical range
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5 183 encountered in commercial fields. Thus, if the outcomes are to be used in support of conservation
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7 184 decision making, it is essential that such studies be repeated at realistic exposure rates or scenarios.
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11 186 The difficulties of reaching an overall consensus on future neonicotinoid use are also exacerbated by
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13 187 the challenge of publishing studies showing no-effects in high impact factor journals, which prevents
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15 188 the full range of evidence being placed in the public arena. If balanced conclusions on hazards posed
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17 189 are to be arrived at, editors should counter the bias towards publishing results showing positive
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19 190 effects which can lead to a misleading overview of real-environment responses due to promotion of
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21 191 data generated using supra-field exposure rates.
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26 193 These problems with the evidence base, coupled with a failure to publish data generated for
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28 194 registration portfolios, may partly explain why an increasing number of studies appear to challenge
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30 195 the original decision to register the neonicotinoids for use. This is worrying as failure to accurately
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32 196 characterise and quantify hazards and risks posed by this class of insecticides, may give the
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34 197 appearance that the moratorium will have greater impact in halting bee decline than might
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36 198 ultimately occur. This would impede rather than support conservation efforts by diverting attention
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38 199 away from other critical drivers such as landscape change which require urgent and immediate
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40 200 research and action. Thus further well targeted, well designed and conclusive research is needed to
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42 201 fill the above data gaps. In addition, monitoring over time is required to understand the full
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44 202 consequences of either use or a ban on the use of neonicotinoids. Only then can the relative
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46 203 importance of neonicotinoid insecticides and other drivers be assessed and conservation responses
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48 204 properly reflect this balance. Failure to do so may result in our addressing the wrong problems.
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51 205 Currently, monitoring of the impact on crop production of the EU neonicotinoid ban in the UK is in
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53 206 its early stages and requires further time before clear conclusions emerge (Dewar & Walters, 2016).
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3 208 There is growing concern that the resultant loss of neonicotinoids following the EU ban, and the
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5 209 consequential increased reliance on alternative pest management products may lead to increased
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7 210 rather than decreased environmental impacts on non-target organisms. If it does, it could impede
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9 211 efforts to develop sustainable pest management practices. Is this the case and what can be learnt
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11 212 from the extensive research relating to integrated pest management (IPM) that could inform this
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13 213 debate?
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17 18 215 **Perspectives from Integrated Pest Management**

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22 217 With the approaching review of the EU moratorium Raine & Gill (2015) correctly concluded that we
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24 218 must balance the risks of neonicotinoid exposure for insect pollinators and the value these
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26 219 pesticides provide to ensure crop yield and quality; does it matter if we lose these products?
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31 221 As illustrated by the lack of publications, the highly focussed debate and large literature on the
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33 222 impact of this class of crop protection products on pollinators has hitherto not been matched by
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35 223 similar debate on their wider importance in crop production. The wide scale use of neonicotinoid
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37 224 pesticides in all major and many minor crops worldwide, and their importance in resistance
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39 225 management, illustrates their central role in agricultural production (Blacquiere *et al.*, 2012;
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41 226 Goulson, 2013). It is therefore worrying that the relative environmental impact of possible
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43 227 alternative pest management products is rarely raised. Whereas occasional calls for us to evaluate
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45 228 alternative options for pest control (including IPM) have been made (Goulson *et al.*, 2015), current
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47 229 use and importance of neonicotinoids in such systems is rarely highlighted (Budge *et al.*, 2015; North
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49 230 *et al.*, 2016). Further, the wider value of information on their impact on or compatibility with natural
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51 231 enemies is almost never considered when assessing impact on pollinators. With an increasing global
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53 232 population sustainable crop production is a priority concern which should complement not compete
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55 233 with conservation objectives, so what can be learnt from IPM research?
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5 235 *Transferable Biology*: Narrow interpretation of outcomes of pollinator research can in some cases be
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7 236 avoided by considering information generated by IPM research. A recent study by Kessler *et al*
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9 237 (2015) investigating the proposal that bumblebees could detect and avoid neonicotinoid treated
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11 238 crops, came to the apparently contradictory conclusions that for imidacloprid and thiamethoxam
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13 239 they could not detect the active ingredient, consumed less contaminated nectar, but none-the-less
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15 240 foraged preferentially on treated nectar. In this case, irrespective of whether the bees consumed
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17 241 treated nectar preferentially, long established natural enemy research has shown that detection of a
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19 242 pesticide is not always necessary for reduction of predator exposure to treated food (Singh, 2001;
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21 243 Singh *et al.*, 2004; Thornham *et al.*, 2007). For example in well controlled laboratory experiments
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23 244 *Coccinella septempunctata* consumed fewer pesticide resistant aphids that had been pre-treated
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25 245 with active ingredients from other pesticide groups than untreated aphids, but choice tests indicated
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27 246 that they were unable to detect the low residue (approximately 19 nL) deposited on the aphid
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29 247 cuticle (Thornham *et al.*, 2007). It was concluded that physiological processes resulted in the
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31 248 observed temporary reduction in feeding rate while metabolic detoxification takes place thus
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33 249 protecting the biological control agent. This response has been used to facilitate IPM strategies
34
35 250 when insecticides and *C. septempunctata* are used simultaneously. This is potentially important for
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37 251 interpretation of the bumblebee study (Kessler *et al.*, 2015), as a similar reversible reduction in
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39 252 consumption of imidacloprid and thiamethoxam treated nectar substitute to those noted for
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41 253 Coccinellids had been demonstrated previously in bumblebees, using bioassays that generated no
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43 254 evidence of behavioural avoidance (Thompson *et al.*, 2014b). Thus reference to the Coccinellid study
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45 255 may suggest a partial explanation of some of Kessler *et al.* findings without the need to invoke
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47 256 behavioural attraction or avoidance. Such work conducted on natural enemies for IPM can
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49 257 strategically inform work on pollinators in relation to responses to neonicotinoid (and other)
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51 258 insecticides. Similar improved integration of findings of IPM and pollinator research may support the
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3 259 avoidance of narrow interpretation, reducing the risk of misleading or incomplete information being
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5 260 used as a basis for conservation policy.

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9 262 *Compatibility with natural enemies and IPM*: Research into IPM is, however, more central to the
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11 263 debate over the impacts of this insecticide class on pollinators and our mitigation strategy, than the
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13 264 simple provision of transferable biology. A little discussed consideration is the many reports of
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15 265 compatibility of neonicotinoid active ingredients with a wide range of biological control agents.
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17 266 Many studies have been conducted on the lethal and sub-lethal effects of a wide range of natural
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19 267 enemies or bio-control agents, from a broad range of taxonomic groups, which consider impact on
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21 268 both individual species and the natural enemy complexes that occur on crops (e.g. Cuthbertson *et al.*
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23 269 2012; Roubos *et al.*, 2014a; Shah *et al.* 2007; Smith & Krischik 1999; Vincent *et al.* 2000). The findings
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25 270 of these studies record widespread compatibility with non-target beneficial organisms at field
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27 271 realistic exposure rates, as is the case for many insecticides that have passed through current
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29 272 registration processes. As a result the neonicotinoids have been found to be both suitable for, and
30
31 273 frequently are used as components of commercial IPM systems. The environmental impact of such
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33 274 compounds can also be further reduced by application methods that target the pest more closely,
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35 275 and availability in both spray and seed treatment formulations offers IPM specialists more options to
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37 276 reduce exposure of non-target organisms (Matthews, 2014), including pollinators. This should be
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39 277 taken into account when balancing conservation and crop production decision making.
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46 279 In addition there is extensive research on farming approaches, operating at different scales, that
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48 280 facilitate combined use of naturally occurring predators and parasitoids (and potentially pollinators)
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50 281 with conventional insecticides (Roubos *et al.* 2014b). For example, at the farm scale, techniques that
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52 282 can be used to reduce impact of pesticide applications on non-target invertebrates include low
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54 283 doses, application method, spatial and temporal targeting of applications, selection of formulation
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56 284 and creation of refugia, amongst many others (Oakley *et al.*, 1996; Roubos *et al.* 2014b). At the
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3 285 landscape scale, habitat quality and composition affect the magnitude of ecological services
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5 286 available, and also mitigate against the effects of pesticides on natural enemies. Current research is
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7 287 establishing the relative importance of local and landscape effects of pesticides on natural enemies
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9 288 and other ecosystem service provision to support government policy development and development
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11 289 of improved land management strategies (e.g. Kennedy *et al.* 2013; Roubos *et al.* 2014b). This work
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14 290 is yielding information of potential value to the pollinator debate.
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18 292 IPM is context sensitive and locally adapted; to tailor such dynamic systems to local needs requires
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20 293 the availability of a range of insecticide products/classes to facilitate their use, and neonicotinoids
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22 294 often feature. The loss of a significant sub-set of this class of insecticides may thus impair the
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24 295 development of sustainable pest control approaches at the time when they have never been more
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26 296 important in crop production.
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31 298 Such concerns would, of course, be lessened if key sustainable pest control systems for the major
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33 299 crops that rely on this class of insecticides did not currently exist. There are, however, multiple
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35 300 examples of key control systems that utilise these products. The concept of integrated control has
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37 301 been applied in Arizona (Naranjo and Ellsworth 2009); for example for more than 15 years *Bemisia*
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39 302 *tabaci* has been controlled on cotton using a strategy based on neonicotinoid insecticides. This has
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41 303 resulted in an estimated 70% reduction in foliar insecticide use, promoting both
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43 304 conservation/enhanced utilization of ecosystem services, with a saving to the industry of >\$200
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45 305 million (encouraging uptake). The system simultaneously promotes conservation of biodiversity and
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47 306 sustainable crop production and is thought to be so important that cross commodity guidelines for
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49 307 managing the use of the insecticide class are now in place to sustain efficacy (Palumbo *et al.* 2003).
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55 309 This is by no means the only example of the use of neonicotinoids in sustainable management
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57 310 systems. Control strategies aimed at temperate climate fruit crops in Michigan have been effective
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3 311 against aphids, leafhoppers, and true fruit flies (depending on active ingredient) and have driven
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5 312 grower transition from broad spectrum insecticides to reduced-risk classes. Neonicotinoids are key
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7 313 to sustainable strategies for cotton in Australia (fundamental to successful IPM especially for control
8
9 314 of secondary sucking pests such as mirids and *Aphis gossypii*, where emergence of neonicotinoid
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11 315 resistance resulted in substantial efforts to recover efficacy). Products based on this class of
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13 316 insecticides are central to sustainable pest management in cotton in India, grapes in Tunisia, invasive
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15 317 pests transported on world trade in plants and plant products, and many others (Chen et al. 2013;
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17 318 Cuthbertson et al., 2012; Daane et al., Herron & Wilson 2011; Mansour et al. 2010). Loss of
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19 319 neonicotinoids where no reduced-risk alternatives (tested for environmental hazard and registered
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21 320 for major commodities) are available will undermine continued use of such sustainable systems,
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23 321 progressive development of new ones, the ecosystem services they rely on, and drive the continued
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25 322 use of more broad-spectrum products. Such an eventuality would be to the detriment of efforts to
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27 323 conserve biodiversity in the agricultural landscape. We must consider that sustainable crop
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29 324 production and conservation of biodiversity should be complementary and not competitive, and
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31 325 management and conservation strategies must both be developed to reflect this principle if we are
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33 326 to make progress in solving the complex issues that we face.
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328 *Disruption of sustainable crop protection:* This is not a theoretical problem but one that we already
329 begin to encounter. Concerns are already being raised regarding the disruption of existing pest
330 management strategies following the EU moratorium (e.g. Bird, 2015; Pucci, 2015), due to both loss
331 of effective pest control and potential detrimental impact on natural enemy populations that exert
332 incidental background pest suppression.

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334 Nicholls (2013) reviewed the implications of the restriction of use of the neonicotinoids
335 imidacloprid, clothianidin and thiamethoxam on crop protection in oilseeds and cereals in the UK.

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3 336 Prior to the moratorium on their use UK crop production specialists recommended a single
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5 337 neonicotinoid seed treatment to control damage caused each year on oilseed rape by both cabbage
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7 338 stem flea beetle (CSFB; *Psylliodes chrysocephala*), and aphid vectors of turnip yellows virus (*Myzus*
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9 339 *persicae*). Both species display pyrethroid resistance, and aphids are resistant to pirimicarb, the
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11 340 alternative registered active substances available for use. Consequently in the first two years after
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13 341 the moratorium was introduced many crops have received multiple sprays of older (potentially more
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15 342 environmentally hazardous) products. Despite such multiple treatments, CSFB incidence in key
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17 343 oilseed growing areas has significantly increased leading to substantial establishment failure
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19 344 (Nicholls, 2015; Pucci, 2015, Walters & Dewar, 2016). For example, initial figures have shown that 5%
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21 345 of the national crop sown in 2014 was lost during the establishment phase due to CSFB damage,
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23 346 1.5% was replanted but 3.5% was abandoned (Nicholls, 2015). To this will be added any losses
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25 347 accrued from the impact of the aphid borne viruses transmitted in autumn (HGCA, 2013). Such
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27 348 losses vary between years dependent on a range of factors, important amongst which are aphid
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29 349 population size and weather at the time the crop is susceptible to infection. Yield depressions of up
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31 350 to 30% occur and result in farmers using insecticides to reduce transmission rates. The loss of
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33 351 neonicotinoid seed treatments has resulted in farmers now having to rely on more intensive use of
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35 352 older products despite the associated resistance problems noted above (HGCA, 2013).

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43 354 There are also concerns that the current situation in UK oilseed rape might present challenges to our
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45 355 ongoing efforts to conserve the wild pollinator populations we are attempting to protect?

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47 356 Discussions in the farming press indicate that the increase in crop failure described above, an
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49 357 expectation that significant yield losses have resulted from reduced pest control, and worries about
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51 358 the resistance status and environmental effects of alternatives to neonicotinoid seed treatments,
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53 359 may lead to a reduction in the OSR acreage sown in the UK and elsewhere. Although Kleijn *et al.*
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55 360 (2015) suggest that many at-risk pollinator species do not appear frequently in mass flowering crops,
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3 361 such crops have been shown to be beneficial to bees such as non-*Bombus* generalist pollinators
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5 362 (Riedinger *et al.*, 2015) thus loss of a proportion of the already restricted forage in the farming
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7 363 landscape may exacerbate conservation challenges.
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13 365 The impact of the moratorium on the use of these products or, as some start to call for, its'
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15 366 broadening to encompass other neonicotinoid insecticides, must also be considered against the
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17 367 ongoing trend of increasing loss of available plant protection products. The report of The Anderson
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19 368 Centre on "The effect of the loss of plant protection products on UK agriculture and horticulture and
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21 369 the wider economy" identifies three main policies that they conclude threaten their availability in
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23 370 Europe/the UK (The Anderson Centre 2014). These include the approval process leading to pesticide
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25 371 registration at EU level, the implementation of the Water Framework Directive at national level
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27 372 which will influence/restrict the use of pesticide products, and restrictions on neonicotinoid seed
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29 373 treatments. They identify 87 of the current approximately 250 active substances as being threatened
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31 374 but suggest this is probably an underestimate. Of these, 59% of insecticides were classified as being
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33 375 at high risk of loss, and 41% as medium; none were low risk (The Anderson Centre 2014). As
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35 376 environmentally sustainable crop management requires the availability of a range of modes of
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37 377 action, then serious consideration must be given to this report when scientific advice is provided to
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39 378 policy makers reviewing the moratorium. A reversion to a narrow range of older chemistries is likely
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41 379 to risk the emergence of wider challenges and threats to both the natural environment and
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43 380 conservation efforts, particularly in agroecosystems. This problem is significantly under-represented
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45 381 in discussions and planning of the conservation of biodiversity and as a result may lead to serious
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47 382 unintended consequences if it emerges as a threat to worldwide food security through yield
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49 383 reductions. Under such circumstances it might, for example, lead to pressure for increasing the
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51 384 proportion of land devoted to agriculture to the detriment of natural environments.
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3 386 **Broadening the debate; risks and consequences**
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6 387 In conclusion, UN estimates that to keep pace with growing demand there needs to be a 70%
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8 388 increase in global food production by 2050 are widely reported (Godfray, 2010). The agricultural
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10 389 industry currently, therefore, faces a complex of contradictory challenges. Production targets need
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12 390 to be increased but this is made more difficult by the limited availability of land. The problem is
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14 391 exacerbated by the essential need to devote large areas of suitable land for conservation of
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16 392 biodiversity. In addition the impact of climate change (e.g. energy crops competing for land), a
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18 393 decreasing number of pesticides leading to frequent resistance problems (and associated damage to
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20 394 some ecosystem services), and financial constraints on production research (Godfray, 2010) add to
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22 395 the issues. To achieve the overall aim without causing unacceptable environmental damage requires
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24 396 sustainable intensification without making the mistakes of the 1960s (when application of crop
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26 397 protection products that have since been superseded, using approaches that have been changed
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28 398 and improved, resulted in significant non-target impact). Thus the targets have to be achieved in
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30 399 conjunction with associated (complimentary) conservation and biodiversity objectives. These
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32 400 challenges can be met within the important constraints imposed by conservation principles and
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34 401 objectives, but sustainable combined strategies will require a broad focus and balanced judgements
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36 402 based (in some cases) on more robust scientific evidence, that take account of a wide range of
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38 403 factors. Against a background of issues illustrated above, however, conservation outcomes are
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40 404 currently not well served by a too narrow focus on a single class of insecticides, particularly as they
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42 405 are widely considered not to be the principle driver of bee decline (Vanbergen *et al.*, 2013).
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44 406 Broadening of the debate to consider the complimentary objectives of bee conservation and
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46 407 sustainable crop production would therefore enable advances in both fields to be more readily used
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48 408 to hasten consensus on the way forward, surely preferable to our current polarised debate that
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50 409 reduces the prospect of such consensus being achieved.
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3 411 If the narrowly focused European debate regarding the future of the neonicotinoids is not
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5 412 broadened to recognise the limitations of the current evidence base, take account of the full range
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7 413 of impinging issues, and adopt a balanced overview of the consequences accruing from the loss of a
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9 414 substantial proportion of a class of modern insecticides, then it will only add to the problems we
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11 415 face. If the evidence ultimately indicates that the risks identified outweigh the advantages of their
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13 416 use then the way forward is clear, but Raine and Gill (2015) are correct, we must “find the right
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15 417 balance between the risks of neonicotinoid exposure for insect pollinators and the value these
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17 418 pesticides provide to ensure crop yield and quality”. Otherwise we may be at risk of making
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19 419 decisions which have far reaching impacts without taking a sufficiently holistic overview. Let us heed
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21 420 the warning of Robert Louis Stevenson.
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