

April 2016

K.v.K. Leiden 40446002

IBAN: NL56 RABO 0388 1106 94

Subject: Information on use of neonicotinoids on flowering bulbs

Anthos have previously issued a statement explaining our approach to the issue of residues (see appendix). We are now providing some additional information in response to a number of specific queries concerning the use of neonicotinoids in the cultivation of flowering bulbs in connection with the health of bees.

Summary

Five crop protection agents from the neonicotinoid group are permitted for use in the cultivation of flowering bulbs in the Netherlands. Restrictions apply to the use of these agents, to prevent any risk to bees and bumblebees.

Research carried out on behalf of Anthos by Wageningen University shows that residues of neonicotinoids occur on flowering bulbs only in very low and non-hazardous concentrations, or not at all.

The use of neonicotinoids in the cultivation of flowering bulbs

The following five crop protection agents in the neonicotinoid group are legally permitted for use in the cultivation of flowering bulbs in the Netherlands ¹(the active ingredient is shown in brackets):

- WOPRO Imidacloprid 70 WG (imidacloprid)
- Admire (imidacloprid)
- Kohinor 700 WG (imidacloprid)
- Calypso (thiacloprid)
- Gazelle (acetamiprid)

These agents may be used on flowering bulbs during cultivation or in a dipping treatment. Calypso and Gazelle may only be sprayed on the crop while the agents based on imidacloprid can be used in a dipping treatment. The use of Admire has virtually ceased. The conditions for the use of the imidacloprid based agents are so restrictive that only applications presenting no risk to bees and bumblebees are permitted (for example they may not be used on crops in flower). Agents based on thiacloprid (Calypso) and acetamiprid (Gazelle) are safe for bees and bumblebees when used at the permitted dose rates, and there are therefore no restrictions on their use during the flowering period.

Residues of neonicotinoids on flowering bulbs

In 2015 Anthos asked the research institute at Wageningen University to carry out research into residues in flowering bulbs. The researchers investigated 107 batches of bulbs including tulips (35), narcissi (20), crocus (11), grape hyacinths (9), lilies (12), gladioli (10) and dahlias (10) at the time when each batch was ready for delivery.

¹The Crop Protection Agent Permissions Board (Ctgb) issues permits for crop protection agents at the national level, once the European Permissions Authority EFSA has permitted their use at the European level. The principle is that crop protection agents permitted in the Netherlands are safe for man, animals and the environment. The Dutch Food and Consumer Product Safety Authority (Voedsel- en Warenautoriteit (NVWA) monitor the application of crop protection agents to ensure compliance with the regulations. The NVWA and the Ctgb are government agencies.



Residues of neonicotinoids were found in 8 of these batches (7% of the total). In all cases the substance involved was imidacloprid at low levels². No neonicotinoids at all were found in the tulips, narcissi, grape hyacinths or dahlias.

In conclusion we would emphasise that we are hard at work here in the Netherlands on the reduction of the use of crop protection agents. Research is also being carried out into alternative, environmentally friendly crop protection agents and methods.

We will be happy to provide further detail on the content of this message on request.

ANTHOS

Mr H. Westerhof
Chairman

²Two batches of crocus (mean residue 0.03mg/kg), three batches of lilies (mean residue 2 mg/kg) and three batches of gladioli (mean residue 0.07 mg/kg).



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Subject: Requirements relating to residues on flower bulbs and tree nursery products

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Anthos is the organisation that represents the interests of the trading companies active in the flower bulb and tree nursery sector in the Netherlands. In doing so, we maintain contacts with a wide network in which we act on behalf of the aforementioned trading companies in respect of government bodies and public-law and private-law organisations, both nationally and abroad. A number of our member companies have asked us to assist in finding a solution for the debate regarding the effects of the neonicotinoids used in the cultivation of flower bulbs and tree nursery products on the health of bees. This letter briefly explains our view on this subject and describes our efforts to comply with purchaser requirements.

Evaluation and authorisation of plant protection products in the Netherlands

The use of plant protection products, including neonicotinoids, is only authorised after they have been evaluated as safe for 'humans, animals and the environment'. This process also analyses the health risks for bees. First of all, the active substances are subjected to extensive analysis at European level. Next, the separate plant protection products which contain these substances are evaluated nationally by the Board for the Authorisation of Plant Protection Products and Biocides (Ctgb). The Dutch Food and Consumer Product Safety Authority (Voedsel- en Warenautoriteit/NVWA) monitors correct use of products by businesses. In comparison to other countries, the authorisation procedure applied by the Netherlands for products used for floriculture is the strictest in Europe.

Authorisation of neonicotinoids in relation to the health of bees

The degree of harm caused by some crop protection products to the health of bees is the subject of intensive debate at European and national level. Research into this issue is still very much ongoing and new scientific information about the relationship between neonicotinoids and the health of bees is regularly made available. In anticipation of further studies, the European Commission has decided to temporarily suspend the use of a number of insecticides on crops that are attractive to bees. Furthermore, Secretary of State Dijkzma initiated the launch of the Bee Health Action Programme (Actieprogramma Bijengezondheid) in the Netherlands at the end of 2013. This is a multi-year bee health monitoring and surveillance programme. In 2015, the Ctgb, in collaboration with all the member states, shall once again assess the risks of all neonicotinoids relative to the health of bees in a review. At present, the Dutch government considers additional changes to the package of products to be neither necessary nor lawful and justified, and, furthermore, any such changes would have a major impact on a large number of floriculture products.

Greenpeace investigation into residues

We are aware that the Non-Governmental Organizations (NGOs) find this result to be inadequate. They have therefore decided to continue their protest actions in different ways, such as via market parties. In 2014, Greenpeace took samples from a broad range of flower bulbs (in pots, but mainly dried bulbs offered for sale) and garden plants in the Netherlands and other European countries and had them investigated for the presence of residues of crop protection products. The results were published in two reports, which attracted a great deal of media attention in various countries. These publications have wrongfully harmed the reputation of our sectors and the products that we produce and trade - a situation that we very much regret.





Analysis performed by Wageningen UR

In the case of a number of plants, residues of products were found whose use for the plants in question is forbidden in the Netherlands. We asked an independent research institute, Praktijkonderzoek Plant en Omgeving (PPO) of Wageningen UR, to analyse the origin of the residues that were found. Most of the residues that were found comply with the expected residue standards based on the authorised uses in the Netherlands. In the case of other residues, PPO indicates that cross-contamination caused by their use for other crops is a likely explanation, or that they involve imported material from other European countries where use of the product in question is authorised. A small number of residues could not be explained. Anthos strongly condemns the use of products that are not authorised for a particular crop.

Sustainability

Dutch flower bulbs and tree nursery products are among the best in the world, not only in terms of volume and diversity, but also in terms of quality and sustainability. The Netherlands is one of the first countries in which integrated crop protection has become a widespread practice. Partly due to the influence of various policy programmes implemented by the Dutch government, major progress has been made in the area of reducing the use, emissions and environmental effects of crop protection products. Continuous development is ongoing in the area of crop protection products. The industry focuses increasingly on crop protection products of natural origin, also referred to as green crop protection products.

Protecting crops against diseases and pests is necessary in order to produce an end-product of good quality. All efforts are focused on achieving this based on a clean start (healthy primary plant material), prevention, a biological approach and only correctively using chemicals when strictly necessary. That multiple residues are often found on the end-product can be explained by the fact that different products have to be used to combat the range of diseases and pests and the requirement for resistance management, which results in the use of products from different chemical groups.

Residue Indicator

In order to maintain our leading position, we strive to offer products of irreproachable quality to our trading partners. Consequently, Anthos maintains intensive contact with all parties in the value chain and enlists the support of knowledge institutes, including Wageningen UR, as required. Contrary to food crops, there are no standards for the maximum residues that may be present on floriculture products. This is one of the reasons why we are collaborating with Wageningen UR in investigating the possibility of developing a Residue Indicator. This indicator will specify the active substances and the maximum residues resulting from normal use for each crop group. The Residue Indicator is intended to be used as an aid by retailers and defines the standards that are acceptable for the products and that do not have any adverse effect on the health of bees

Finally, we wish to emphasise that we - like the retail trade - have clearly defined objectives in the area of sustainability. All of the efforts to introduce integrated crop protection and reduce the use of crop protection products will without doubt result in a reduction of the residue on the end-product. Together with the businesses active in the flower bulb and tree nursery sector, we will do our utmost to achieve that target reduction. However, we are unable to achieve the impossible, such as the extremely tough zero tolerance demanded by retailers for several types of residue. Therefore, we request your understanding in this area, particularly in view of all of the efforts that we have made.



Finally, we would like to once again emphasise that, in view of the stringent evaluation and authorisation policy and the checks performed by the Dutch Food and Consumer Product Safety Authority, the adverse effects of crop protection products, including neonicotinoids, on the bee mortality rate will be kept to a minimum. We also hope to offer greater transparency in this area by developing the Residue Indicator.

We trust that this information will help to maintain your current high level of confidence in the flower bulb and tree nursery sector and will gladly provide further explanations regarding the content of this letter if required.

ANTHOS

mr. H. Westerhof
Chairman