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The Scottish Parliament
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Our ref: 2018/0016278
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Dear Michael,

Thank you for your letter of the 16th May regarding the use of neonicotinoids and requesting a change to the forestry regulations in light of the recent EU action further restricting the use of some of these chemicals in the UK. I am very aware of the sensitivities in the local community on Mull to the use of these chemicals, and have been party to the ongoing correspondence on this issue to date.

The Scottish Government considers the impact of chemicals on public health and the environment to be a very serious issue. As you will be aware, I confirmed my support to the UK Government for increasing the restriction on the use of three neonicotinoids (clothianidin, imidacloprid and thiamethoxam) for which there was the recent vote in the EU. This was in response to evidence of their effect particularly on bees and pollinators.

In the case of acetamiprid and its use for forestry purposes, the Scottish Government follows the advice of the Chemicals Regulation Division of the Health and Safety Executive, whose primary focus is the protection of human health and the environment. They have judged that, if used according to the conditions they have specified, this chemical would not pose an unacceptable risk to consumer, operators, bystanders or the wider environment. This chemical is used across the UK where there are high populations of Hylobius and the evidence to date is that failure to use chemicals in these situations would have a serious impact on the overall site productivity resulting in a loss of up to 50% of the newly planted trees. I will of course continue to monitor for any changes in this advice.

In relation to your specific follow up question, my officials have been in touch with officials in DEFRA and they are not aware of increasing pressure for a ban on acetamiprid. They also clarified that the UK government position remains the same.

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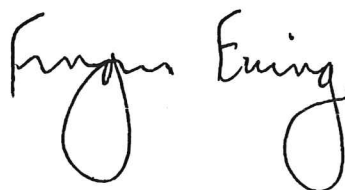
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I therefore continue to support the judicious use of this chemical on restock sites where necessary to control the Hylobius population. There is a high level of responsibility on contractors and managers to ensure strict adherence to these conditions and specifications, and ensure that it is applied in accordance with the product label and relevant operational and best practice guidance. The UK forestry Standard and the General Binding Rules for example, which cover pesticide use, specifically focus on avoiding any negative impacts on the water environment. For the majority of forestry operations in Scotland, you will also be aware that there is an additional level of third party scrutiny through certification under the UK Woodland Assurance Scheme which requires the appropriate and safe use of chemicals and the active consideration of non-chemical alternatives.

Given that a ban would be inappropriate, but recognising the desire to reduce chemical use, the Scottish Government has supported work by Forest Research on the use of chemicals in forestry for many years including: population dynamics of Hylobius, the development of the Hylobius Management Support System, the techniques for the application of chemicals to minimise use, alternative chemicals (particularly for cypermethin), and alternatives to chemicals such as barrier methods. We will continue to support this research and are also exploring the development of a number of other initiatives to look for additional funding to carry out further research.

In addition Scottish Government supports a collaborative initiative called 'Forest and Water Scotland' launched in 2016 and led by FCS, SEPA, FES and the forest industry. This initiative aims to increase awareness and promote best practice in relation to forest operations and water. There are plans in place to further develop this work in the future and as part of this we will look to renew our communications efforts to ensure that all forest companies and practitioners are aware of their responsibilities in relation to the application of chemicals for forestry purposes.

I also recognise that it is important that forestry managers and operators engage with the local communities to provide reassurance about forest management practices, and demonstrate clear compliance with the relevant environmental and Health and Safety requirements. My officials in Forestry Commission Scotland will continue to promote this aspect of good practice strongly with those who apply for felling licences and permissions.



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