

LANXESS Deutschland GmbH

**To who it may concern**

**Imidacloprid - EPA and PMRA preliminary pollinator risk assessments**

Neonicotinoids are a relatively new class of insecticides. Like most insecticides, these compounds are active against many insect pests, and some are also active on pollinators, including bees. Industrial and independent scientists have worked diligently to ensure that these efficient and highly beneficial insecticides can be used without causing adverse effects on bees. The active substance imidacloprid is one of the most heavily researched products in terms of bee safety assessment. With hundreds of studies conducted and a history of safe uses across the world, more is known about this Neonicotinoid and honey bees than for any other pesticide. The new field studies conducted as part of EPA and PMRA's current reviews may be the most comprehensive ever.

Regulatory agencies constantly review these products based on the latest scientific data to ensure they pose no undue risk to people or the environment. On January 6, 2016, the U.S. Environmental Protection Agency (EPA) and the Canadian Pest Management Regulatory Agency (PMRA) announced their respective preliminary pollinator risk assessments for imidacloprid. Both agencies followed a science based approach (the EPA-PMRA-CDPR 2014 Guidance for Assessing Pesticide Risks to Bees). In the assessments, the agencies determine if pesticides with these actives may pose a risk to honey bees.

For the first time, in the preliminary risk assessment the agencies identified a level where honey bee colonies can tolerate being exposed to the neonicotinoid without long-term adverse effects. The residue level for imidacloprid of 25 parts per billion, which sets a threshold above which effects on pollinator hives are likely to be seen, and at that level and below which effects are unlikely." ("01/06/2016: EPA Releases the First of Four Preliminary Risk Assessments for Insecticides Potentially Harmful to Bees.") Given that level of 25ppb, the agencies found that, by and large, using these neonicotinoids on crops did not pose long term risk to honey bee colonies.

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It is expected that bees are typically exposed to much lower amounts of imidacloprid from treated materials when material protection products are used responsibly and properly in accordance with the label instructions. In order to reduce the potential for environmental exposure the LANXESS EPA approved label for Preventol TM Insecticide (EPA Reg. No. 39967-17), Preventol TM Insecticide Preservative (EPA Reg. No. 39967-15) and Preventol TM-EPS (EPA Reg. No. 39967-80) all contain directions that require indoor manufacturing of the end products. Therefore, bees just aren't that likely to encounter amounts of imidacloprid that would come close to posing a threat to their colony. No restrictions are foreseen in the short term.

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March 11, 2016

Subject

Page 2 of 3

EPA and PMRA note that this assessment is still preliminary and similar assessments are on-going for other Neonicotinoids. A revised assessment to be published at the end of 2016 will also include all registered uses including non-agricultural uses.

In 2001 LANXESS Deutschland GmbH initiated a field study in Germany to assess possible side effects of wood preservatives containing neonicotinoids on honey bees (*Apis mellifera* L.).

The effects of wood preservatives - containing Imidacloprid in combination with a common fungicide - treated hives were tested on several colonies of honey bees under field conditions at an independent laboratory in Germany. Observations of bee brood and development of the colonies as well as flight activity at the entrance of the hives and the weight of the colonies were determined periodically during the 5 month test period.

Overall it can be concluded that wood preservatives containing Imidacloprid had no effect on brood development, the flight activity at the entrance of the hives and the weight of the colonies. All colonies of the treatments group (treated hives) showed similar development and activity compared to the control group (untreated hives).

LANXESS remains convinced that neonicotinoids are safe when used responsibly and properly in accordance with the label instructions. LANXESS distributes products which have been granted regulatory approvals by the authorities in several countries worldwide.



The information herein is based on our current knowledge. Therefore the information given herein is given in good faith and without binding effect and is open for necessary adjustments. Also our advice does not release you from the obligation to verify the information currently provided.

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Subject

Page 3 of 3

Yours sincerely,  
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