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1	Agrochemicals in the wild: identifying links between pesticide use and declines of non-target organisms
Z	declines of non-target organisms
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12	Agricultural pesticides are a key component of the toolbox of most agricultural systems and are
13	likely to continue to play a role in meeting the challenge of feeding a growing global population.
14	However, pesticide use has well documented and often significant consequences for populations of
15	native wildlife. Although rigorous, regulatory processes for the approval of new chemicals for
16	agronomic use do have limitations which may fail to identify real world negative effects of products.
17	Here, we describe a possible approach to complement the existing regulatory process, which is to
18	combine long-term and national-scale data sets on native wildlife with pesticide use data to
19	understand long-term and large-scale impacts of agrochemicals on wildlife populations.
20	
21	Keywords: Occupancy-detection models; pollinators; sustainable agriculture; biological recording;
22	pesticide surveillance

#### 24 1 Introduction

25 Agricultural pesticides have an important role in feeding a rapidly growing human population [1], but 26 their use has important consequences for the environment [2]. Pesticides can cause declines in 27 populations of non-target organisms exposed to them [2–7], with potential knock-on consequences 28 for the ecosystem services they provide, including pollination and natural pest control [8–10]. 29 Internationally, there is enormous variation in the approach to pesticide regulation, in standards of 30 implementation and extent of enforcement [11,12]. In most developed countries, laboratory and 31 field tests are conducted to ensure acceptable thresholds of risk are met based on chemical 32 toxicology, fate and behaviour in the environment [13] (Fig. 1). After approval from the regulatory authority, the chemical is licenced under specific limitations (e.g. approved concentrations) for the 33 duration of the licence, typically 10-15 years in Europe and the United States [11,14]. Whilst 34 35 rigorous, this process has limited potential to assess the impacts of large-scale use of chemicals on wildlife populations. The most significant limitations are: 1) a focus on time scales (days) much 36 37 shorter than population level processes responding to environmental drivers (years) [15,16]; 2) 38 failure to capture the fact that, as the pesticide becomes more common, its landscape-scale dose 39 increases and so does wildlife exposure, despite the application per unit area remaining the same [14,17]; 3) assays are performed on a small number of model species [15]; and 4) an absence of post 40 41 approval monitoring under real world conditions where species are exposed to a cocktail of agrochemicals that may interact in unexpected ways [8–10,14]. 42

Here, we assess the practicalities, limitations and best practices for linking long term wildlife
population changes to pesticide exposure risks at national scales. By making the most of available
large-scale datasets and sophisticated statistical methods it is possible to gain new insights to
augment the existing regulatory assessments in a manner not possible under current frameworks.
Specifically, we argue for systematic post-approval monitoring of real-world impacts of pesticide use
on wildlife populations (Fig. 1). We focus on terrestrial agroecosystems, which represent the direct

- 49 interface between agriculture and wildlife populations. Our goal is to provide a framework that can
- 50 be applied to link the use and regulation of agrochemicals to long term declines in populations of
- 51 non-target organisms.



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Figure 1. Proposed modification to the regulatory framework to evaluate large-scale and long-term 53 impacts of pesticides on non-target organisms. The three green boxes represent the main steps of the 54 approval procedure for a new pesticide [14]. First the substance is tested using both in vitro and in 55 56 vivo trials in the lab to determine its efficacy, safety and toxicology. Then lab and field trials are 57 conducted to determine the chemical's toxicology, fate and behaviour in the environment. The data 58 from these tests is submitted to the regulatory body, where the information is reviewed, and the 59 substance can be approved for use under licenced conditions. The last box in yellow represents the 60 missing step in this regulatory framework, a post-approval surveillance system that monitors real-61 world effects of the chemical's use on a commercial scale on non-target wildlife populations. The 62 results from this monitoring step can either provide reassurance that the chemical is safe to use or 63 early warning signs of impacts on wildlife, therefore providing important feedback for a review of 64 licencing conditions, which, as a result, could become more or less stringent.

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Figure 2. Modelled impact of neonicotinoid exposure to a) *Andrena chrysosceles* (species known to forage on treated crops) and b) Andrena fuscipes (species not known to forage on treated crop)
population, two of 62 considered wild bee species. Red line shows actual populations at a national



used. (from ref [15])

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#### 91 2 Limitations of the agricultural pesticide regulatory process

92 After a chemical has passed laboratory and field toxicity tests, it is certified to be safe for use given 93 specific restrictions. There are, however, numerous cases where unexpected and significant 94 environmental consequences have subsequently been identified, leading to the ban of that 95 chemical, for example neonicotinoids ([15] Box 1) and DDT [22]. Unexpected consequences from 96 commercial use of approved pesticides can occur for multiple reasons, including chronic/sub-lethal 97 effects [23], unexpected synergistic interactions with existing chemicals [24] or species-specific 98 toxicokinetic and toxicodynamic responses to chemical exposure [25]. As the majority of regulatory 99 approaches, for practical reasons, focus on a small number of model organisms [26], the 100 consequences of pesticide use on real world ecological communities are hard to predict. Behaviours rarely seen under laboratory conditions may also affect responses to chemicals when used in 101 102 spatially complex agricultural systems. Importantly, as the landscape-scale dose of a pesticide 103 increases with its use becoming more widespread [14], the exposure of organisms that are long-104 distance foragers (for example honeybees) also increases, despite the application rate per unit area 105 remaining largely the same [17]. Even when chronic effects of pesticide exposure are assessed, the 106 time scale of laboratory or semi-field experiments does not permit an assessment of the 107 consequences of chemical exposure on long term population dynamics.

For all these reasons, there is a strong argument for ongoing monitoring of agrochemical impacts after approval to ensure any emerging risks are identified [14]. Such monitoring has potential benefits both for wildlife as well as the agricultural and agrochemical industries: early warning of adverse impacts could be mitigated through control measures, thus avoiding more restrictive legislation such as an outright ban. The gold standard approach for monitoring such impacts is a Before-After-Control-Impact (BACI) design [27]. However, this may not be possible, especially if the goal is to make such assessments at large scale, where the cost would likely be prohibitive and

where replication would be challenging [16]. Moreover, the 'before' component of a BACI design is impossible for agrochemicals already in use. An alternative is to link large scale monitoring of wildlife populations to temporal and spatially explicit data on exposure risk to pesticides. This approach has considerable potential to complement the existing regulatory process, but there are significant issues that need to be addressed for its robust implementation. We discuss these below.

120

121 **3 Data** 

### 122 3.1 Wildlife data

123 Wild populations persist in highly variable systems, so the level of replication required to detect a 124 signal may be hard to achieve under a field experimental settings, especially when large-scale, long-125 term impacts need to be assessed [16]. Structured monitoring schemes that derive quantitative site specific data exist in many countries, e.g. there are more than ten national Butterfly Monitoring 126 127 Schemes in Europe. Opportunistic data, including occurrence records submitted by volunteer citizen 128 scientists, provide a vast source of information about biodiversity, but modelling change is 129 complicated due to the lack of formal protocols [28]. Both monitoring schemes and opportunistic datasets span long periods of time (potentially prior to chemical exposure) and are collected from 130 131 many sites exposed to different levels of pesticides, thus approximating a BACI design. Therefore, 132 observational data on wildlife populations can be used to link trends in biodiversity to the use of 133 chemicals, in spite of the fact that surveys were not designed specifically to detect such impacts.

134

#### 135 3.2 Pesticide data

To quantify the exposure to plant protection products, such as pesticides, spatiotemporal data ontheir use is needed. Because there is no global governance for the use of these products and

138 different countries have very different regulatory standards [11], data on their use remain scattered 139 and not necessarily publicly available. However, the European Union requires (Regulation (EC) No 140 1185/2009) that member countries collect data on pesticide use. For example, the United 141 Kingdom's Pesticide Usage Survey (PUS; [29]) collects data every two years from 1200 farms, 142 stratified by region and size. However, obtaining these data at fine spatial resolution is difficult, in 143 part due to legal protection of the identity of individual farmers. A snapshot of recent PUS data at 144 1km resolution has been recently published [30]; to date time-series have been available only at the 145 resolution of English regions [15]. Another example is California's Pesticide Use Reporting programme [31] which is accessible directly from the California Pesticide Information Portal for the 146 period 1974-2016 and at a spatial resolution of roughly 2.6 Km<sup>2</sup>. Both of these reporting schemes 147 148 collect information on the product used, the application rate and the area of crop treated. These 149 data, combined with published information about mechanisms of exposure (e.g. dietary - direct or 150 indirect through poisoned prey – or contact) provide an opportunity to estimate wildlife exposure 151 risk, although not as precisely as would be possible with experimental data. For example, large scale 152 data is not available on the mode of application or the fate of chemicals (and their metabolites) in the environment [26], therefore this kind of data described here will not provide a true measure of 153 exposure, but only an approximation. 154

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#### 156 3.3 Other relevant covariates

Because wild populations are exposed to multiple stressors simultaneously it is valuable, where data allows, to quantify other major environmental drivers of biodiversity change, including land use change, landscape structure, agricultural practices, and weather [8,10]. These factors can either account for unexplained variation, act as confounding variables or interact with pesticide exposure to produce unexpected effects [32–34]. As ever data limitation at the appropriate spatial and temporal scales can limit the capacity of studies to include such information.

163

#### 164 4 Statistical approaches

165 Spatiotemporal data of wildlife populations tends to include a number of significant biases. This is a 166 result of the fact that in most cases distribution or population data is not collected with the goal of 167 investigating the impact of pesticides on wildlife population. As such the selection of sites surveyed, 168 the frequency or timing of the site visits might not be optimal. Uneven sampling in space is common 169 to many biodiversity datasets, including structured monitoring schemes, however, it is possible to 170 account for such issues statistically, e.g. by the addition of terms to stratify the analysis spatially. 171 Having added such terms, it becomes possible to model biological parameters (e.g. population growth rates) as a function of pesticide exposure using standard statistical approaches (e.g. 172 173 Generalised Linear Models).

174 Due to their opportunistic nature, unstructured species records (e.g. most citizen science datasets) contain three additional biases: uneven recording intensity over time, uneven sampling effort per 175 176 visit and uneven detectability across time and space [28]. Without appropriate statistical approaches 177 there is a significant risk of both false positive or negative effects being detected. Occupancy-178 detection models derived from capture-recapture theory [35], are robust to many of the biases in 179 opportunistic data [36,37] because they explicitly model the detection process to correct for 180 observation, reporting and detection bias. Occupancy-detection models are so-called because they 181 incorporate both the occupancy process (presence/absence) and the detection process 182 (detected/non-detected) in two hierarchically coupled sub-models. Within this modelling 183 framework, covariates on pesticide use can be added to the occupancy sub-model described above. 184 When fitted in a Bayesian framework, it is possible to add variables providing mechanistic 185 explanations for chemical impact, such as species traits that predispose them to high or low risk, e.g. 186 species commonly found in a treated crop are considered to have high risk. This approach has been

used to link application of neonicotinoids to oilseed rape crops to population declines of wild beespecies across England (Box 1 [15]).

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190 5 Conclusions, challenges and limitations

191 Laboratory and field tests conducted under the current pesticide regulatory framework can achieve 192 high resolution assessments of the toxicity of a chemical by identifying causal effects of pesticide exposure on individuals and determining safe concentrations. However, current toxicology testing 193 194 regimes are unable to detect the entire range of toxicity effects that could emerge when the 195 chemical is used at large-scales and over long periods. Therefore, a post-approval monitoring of the 196 long-term population effects of large-scale pesticide use on non-target wildlife is necessary to make 197 the pesticide regulatory framework relevant to real world situations. Ultimately, evidence provided 198 by the current regulatory framework would be complemented by long-term assessments of wildlife 199 persistence linked to large scale pesticide exposure (Fig. 1). The approach would mirror the type of 200 ongoing post approval monitoring used in the regulation of pharmaceuticals [14].

201 When other major factors of environmental change have been accounted for in the models, as well 202 as potentially evidence on toxicity derived from controlled laboratory experiments, this type of 203 analysis is capable of providing strong correlative evidence of a link between pesticide use and 204 ongoing risks to wildlife populations. The main limitation of this approach is the complexity of the 205 system, as it will be impractical to measure all potentially confounding effects or covariates. Wildlife 206 monitoring schemes and citizen science programmes, however, produce big datasets characterised 207 by high spatial and temporal replication. This scale can help to minimise false positives, because the 208 larger the sample size the more representative it will be of the real population, and false negatives, 209 by increasing statistical power. The inclusion of other possible confounding variables (e.g. landscape 210 structure) would further reduce the chance of type I errors, although availability of this data may be

an issue. A further final point to consider is the strong temporal component of use for many
chemicals, which can rapidly go from zero, before approval, to almost complete usage for some
products after several years. This strong time signal and possible lags between pesticide application
and detectable impacts on wildlife, can influence our ability to identify a link between pesticide use
and declines in wildlife populations.

216 As with any modelling, data quality is crucial. There is an ethical argument at the heart of the issue 217 with pesticide data availability. On the one hand, pesticide use affects ecosystem goods and services 218 positively and negatively and agriculture receives a substantial amount of public subsidies. However, 219 data protection regulations require that individual farms and farmers should not be identifiable from 220 the data, leading to information on pesticide use being often only available at very coarse regional resolutions. Ethical considerations aside, the value of this approach can only be improved by open 221 access efforts to collect detailed information on pesticide use at an international level, following the 222 223 example of freshwater quality or pharmaceuticals monitoring programmes (e.g. World Health 224 Organization Programme for International Drug Monitoring [14]). For example, water quality is 225 monitored systematically by testing for the presence of different chemicals. In a similar way, a 226 pesticide monitoring scheme for terrestrial systems could be implemented, including collection of 227 soil and plant samples from farms to detect exact concentrations of chemicals in the field. These 228 data could then be linked to data from wildlife monitoring programmes through the modelling approaches described here. This would establish a post-approval pesticide surveillance system that 229 230 could provide either reassurance that the chemical is safe for the non-target organisms tested or 231 early warning signs of impacts on wildlife populations [14].

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- Agricultural pesticides can be harmful to non-target wildlife populations
- Current regulatory processes often fail to identify impacts on real world systems
- Large-scale long-term data can help identify these impacts
- Sophisticated statistical tools are necessary to deal with the biases in the data
- This approach can complement the regulatory process to prevent impacts on wildlife

Declarations of interest: none.